

# TOGETHER WE ARE CBM

## Code of Ethics and Conduct

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## MESSAGE FROM THE DIRECTOR

**In more than a decade of activities we have managed to position the company as an organization that has staff with solid experience, extensive experience and offering high quality services. Now the challenge is to continue strengthening our organization as a company preferred by our customers, national and international.**

Competing and being among the best consulting companies in the sector challenges us and requires us to act with operational efficiency, quality and ethical responsibility. Therefore, to be up to the challenges that Mexico will face in the next few years in energy matters, we constantly review what we do and how we do it, in order to participate with our best talent and greater determination in the challenges that will come.

We are consolidating an organizational culture with solid principles and values to build a reputation that is based on the trust and loyalty of all our internal and external stakeholders.

This Code of Ethics and Conduct is the document in which our intention and obligation to act always in an integral manner, in all business activities that we execute, is clearly expressed.

In addition to our Code, we have Policies, Rules and Procedures that we must know and be very present in the areas in which we have responsibilities. I invite you to review each of these documents to know what the company expects from us.

The trust of our employees, clients, communities and related in general is very important for us and the mutual recognition of all is the key to join efforts for a common good, which is the work done with excellence. What we achieve in CBM depends on what each one of us does, how we act and put into practice the culture of the Company. Let's work together to continue achieving the goals we have set for ourselves. We are committed to continuing to build strong relationships with our customers; act with integrity and respect and promote excellence in all our activities.

As CBM's trusted professionals we have the responsibility to act ethically and we are together to fulfill this commitment. Is very important that we support each other

and trust each other to understand and comply with their guidelines and professional standards. It is necessary to develop the skills that help us to analyze with certainty the situation and make the right decisions. This Code of Ethics and Conduct is a guide for decision making and we hope that it becomes a tool for permanent consultation in our work.

If we are presented with a situation that is not aligned with the approaches presented here, it is necessary to consult with our supervisors before moving on. It is important to know that the investigations carried out by the Ethics Committee will be carried out discreetly and confidentially, seeking a solution that benefits all involved and the Company.

We hope that this Code is one more tool to consolidate our organizational and operational strength, working together in high performance teams, with a solid ethical culture and always responding with the professionalism, dedication and creativity that characterizes us. Let's move forward.

Managing Director

## Our way of being

**Each one of us has a role to play so that  
our Company continues to grow  
and contribute the best of its talent.  
We are all an important part of this effort.**

Building an identity with solid principles and values are the basis for the success of any company in a competitive environment. The market is constantly changing and professional and ethical demands are increasing.

We as CBM, want to be among the best consulting companies and be recognized as a company with international vision and experience, offering high quality professional services and having the ability to adapt to the highest demands of our customers anywhere in the world.

This commitment requires us to have a unique frame of reference, which serves as a guide so that our actions are always in tune with those values and principles. In this sense, our Code of Ethics and Conduct is a fundamental organizational tool in the management we develop and reinforces the importance for us to carry out our work in accordance with standards, laws, procedures and professional standards to distinguish us for our excellence and competitiveness.

What we are and what we achieve in CBM depends on how each one of us assumes the guidelines that we share in this Code, which constitutes a guide for action in our daily work. The purpose is to align all our efforts to work together, build trust, promote collaboration and act with integrity and ethics in accordance with what is established. If we have doubts, we consult with our supervisors or with the people that make up the Ethics Committee, who will guide us correctly to make the best decision. Together we will make it possible.

## A strong ethical culture

**We want to be recognized as an integral and responsible company, with a clear ethical conscience applied in all our actions and decisions.**

CBM Ingeniería Exploración y Producción is a Mexican company with more than ten years of experience, which develops strategic, tactical and operative solutions for the processes of the Value Chain of hydrocarbons. Always in the pursuit of excellence, we incorporate the best international practices for the creation of value.

Since its creation, many have been the achievements. We are recognized for the use of practitioners, expert professionals with high levels of practical experience and solid knowledge to support the processes of the hydrocarbons chain, project execution, organizational and talent development and business strategies.

Also, as part of our management model, we develop projects with our clients, working with multidisciplinary teams that facilitate the transfer of knowledge with concepts of "learning-doing".

For more than a decade of management, our human resources base has been increasing in quantity and quality, with professionals that add more than 5,000 years of experience, which we make available to the Exploration and Production companies that require our services.

The achievements made are the result of the commitment and loyalty that each of the CBM employees have and show. The compliance of standards and procedures, as well as the laws of the country are key factors so that our ethically responsible performance is recognized and valued by our clients in each of the projects we execute.

### **Our Guiding Principles that govern business ethics are:**

- **Integrity:** We act correctly, with honesty and valuing truth and rectitude at all times.
- **Loyalty:** we comply faithfully and fully with the commitments we establish with any of our stakeholders.
- **Ethics and responsibility:** our activities are carried out by guaranteeing the highest quality standards, in the established times and respecting and complying with the agreements and laws in force.
- **Right and dignified treatment:** we are respectful of all the people who are part of the company or who maintain labor, economic, administrative, industrial or social relations with our company.

- **Respect for the social environment:** we identify with the history, culture and customs of Mexico, so we establish relationships of respect with our customers and related to any company operating in Mexican society.

## **Vision**

To be an integral company of technical assistance, consultancy and professional support in strategic, technical, organizational processes and development of talent for the Mexican oil industry.

## **Mission**

Support our clients in processes associated with the hydrocarbons value chain in

## **Our Values**

### **Ethics, credibility and respect**

Perform with principles and responsibility.

### **Commitment**

Deliver our products on time expectation and needs.

### **Excellence and Integrity**

Best of our capabilities and intellectual honesty.

### **Social Responsibility**

We are committed to the oil education of Mexico through the Chapopote Foundation

## **We are all responsible**

**Our Code of Ethics and Conduct CBM guarantees that both within the Company and outside of it, we act in an integral and respectful manner, practicing our values and principles among ourselves and with our stakeholders.**

Maintaining an ethical, professional and responsible behavior and complying with our Code of Ethics and Conduct is the commitment we assume, regardless of the position or function we perform. We also share its guidelines with our related parties, our stakeholders such as shareholders, business partners, associates, customers and suppliers.

Our Code of Ethics and Conduct is complemented by other guidelines, policies and procedures that offer us fundamental information for the proper performance of our functions.

The recognition and mutual respect towards our co-workers and towards the people external to the Company with whom we interact, helps us to work in harmony and be more productive. Our principles and values guide the performance of the company and each of its collaborators with all its stakeholders:

### **CBM with its employees:**

- The remuneration received by CBM employees and professionals is in accordance with the function they perform.
- We guarantee that your workplaces are safe and healthy.
- We comply with the laws that regulate the employment relationship, guaranteeing that the weekly work hours and overtime hours will not exceed the legally established limit.
- We do not allow discrimination based on religion, sexual orientation, age or political opinion.
- We do not tolerate any form of physical, sexual, psychological or verbal harassment, either between employees or supervisors.
- We promote the development of the abilities and skills of our collaborators, based on intellectual honesty and promoting a collaborative environment encouraging self-development.

**CBM with our shareholders:**

- Based on the shareholders' interest in the long-term sustainability of the company, we develop our activities with a clear orientation towards that purpose, always seeking viability and maximizing value in all the projects we develop.

**CBM with its partners and business associates:**

- We maintain a relationship of respect, loyalty and transparency where teamwork is promoted and information and competencies are shared to achieve the objectives we propose together.

**CBM with its customers:**

- We offer a high standard of excellence and professional quality in all the services we develop. It is very important for us to communicate with clients in a clear and transparent manner in order to maintain an honest and complete relationship.

**CBM with its suppliers:**

- We share our Code of Ethics and Conduct with our suppliers of goods and services to achieve the best quality, the best costs and delivery times adjusted to the requirements of the operations.

**CBM with neighboring communities:**

- We maintain a relationship of respect for the ideas and customs of Mexicans and promote in our staff the cultural values of society.

## Commitments of conduct and responsible practices

**This Code is a guide that helps us incorporate our principles and values in everyday decisions.**

**Knowing, understanding and working according to its guidelines is a fundamental part of who we are, of our business culture.**

The Code of Ethics and Conduct is a document that reflects the values and basic principles of our way of acting, our shared values, and presents a common framework that guides us in our actions and behavior as CBM collaborators. As trusted professionals we have the responsibility to act ethically and we are together to fulfill this commitment. It is very important that we support each other and trust each other to understand and comply with these guidelines and professional standards.

If we are presented with a situation that is not aligned with our principles and values, it is necessary to report the situation to our supervisors or members of the Ethics Committee and consult the doubts. The investigations that are carried out will be totally confidential to guarantee that everything is resolved in a fair and responsible manner. Next, the key elements that it covers are presented:

### Compliance with Applicable Legislation and Internal Regulations

- Corruption issues
- Compliance with Agreements and Agreements
- Relationship with and between employees
- Harassment and Sexual Harassment
- Drugs and alcohol
- Customer Relations
- Practices in the Market
- Relations with Suppliers
- Relationship with Government Authorities and Officials
- Conflicts of interest
- Exercise of Other Professional Activities
- Participation in Political Activities
- Use of Company Goods and Services
- Confidentiality of Information and Protection of Personal Data
- Protection of Intellectual and Industrial Property
- Operations Registry
- The Company's Voice

- Social Commitment
- Health, security and environment

## **Compliance with Applicable Legislation and Internal Regulations**

All CBM employees must comply with current legislation in each of the places where they carry out their activities.

The application of the Code in no case may imply non-compliance with the legal provisions in force where CBM operates.

All CBM employees must comply with the company's rules and procedures, as well as any instructions that may be approved in its development.

To facilitate due internal control, the decisions of the CBM collaborators will be auditable from the point of view of regulatory compliance, so that the adequacy of the decisions to internal and external standards is justifiable, verifiable and verifiable, in the case of review by competent third parties or the company itself.

CBM is committed to providing the necessary means so that its employees know and understand the internal and external regulations necessary for the exercise of their responsibilities.

In the event of any situation that we consider to be contrary to our Code of Ethics and Conduct, the Company has necessary communication channels and the advice of the Ethics Committee so that the collaborator consults in a confidential way their concerns.

## **Anti-corruption**

The integrity of each of the CBM employees is reflected in our way of acting and interacting with our stakeholders. Our employees will conduct themselves in accordance with the principles of transparency, honesty and impartiality; they will comply with the provisions of anti-corruption legislation, undertaking to act in accordance with the principles set forth in national and international instruments.

In this sense, we do not offer, do not grant, promise, or solicit or accept, directly or indirectly, gifts or gifts, favors or compensations, in cash or in kind, whatever their nature, taking into account the transparency we must have. in the decision-making process or the influence that may have on our related.

If we receive a gift or gift that we believe is not in accordance with our code of ethics, we will return it and communicate this circumstance to the Ethics Committee. If we can not make the refund it will go to the social interest. In no way do we receive gifts in cash.

## **Compliance with Agreements and deals**

CBM assumes, as part of its internal regulations, the content of the agreements, national or international, to which it has adhered, committing to its promotion and fulfillment.

## **Relationship with and between employees**

The work welfare of our employees is a priority, so we defend and promote compliance with human and labor rights. We comply fully with the application of regulations and good practices in terms of employment, health and safety conditions in the workplace.

We are all obliged to act with respect, dignity and justice, valuing the culture of each person and not allowing any form of violence, harassment or abuse at work, or any type of discrimination based on race, religion, age, nationality, gender or any other personal or social condition other than their conditions of merit and ability, with special consideration for the care and employment integration of people with disabilities or disabilities.

The employees of CBM promote a collaborative environment among themselves where each one applies their skills and competencies to seek the best possible result, but always practicing intellectual honesty and the pursuit of excellence.

Supervisors exercise their roles by practicing equal treatment and without taking advantage of their leadership to offend, to prevent or delay the processes, always taking into account the respect for human dignity of their supervised and peers.

As part of the company, we are aware of the importance of taking care of the image we transmit, because it significantly influences the image of the company; therefore, we try to preserve the decorum, both in the dress or appearance that we reflect, and in the language used and social behavior. This behavior will be exercised, whether it is in the presence of colleagues, customers and related, or if the representation of the company is exercised in events or other instances associated with the exercise of their functions.

## **Harassment and Sexual Harassment**

CBM prohibits any form of harassment or physical, sexual, psychological or verbal abuse to its employees and professionals, as well as any other conduct that could generate an intimidating, offensive or hostile work environment.

## **Drugs and alcohol**

The consumption of substances that could affect the proper fulfillment of professional obligations is forbidden, therefore its use, possession, sale, sale attempt, while activities are carried out within the CBM facilities, partners, suppliers and our customers.

No person who employees with CBM will be subject to discrimination based on race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality or gender.

## **Customer Relations**

Our relationships with clients are based on consideration, respect and transparency, and we do not allow discrimination based on race, religion, age, nationality, gender or any other personal or social condition different to their abilities. We have special consideration with people with disabilities or disabilities.

Honesty and transparency guide our commercial activities with customers, so we promote the services in a clear way, avoiding false or misleading information that may lead to errors to customers or third parties. In the same way, our services are developed based on respect to our personal and business clients and our promotions and advertising messages are respectful of the society where we interact, so we contribute to positively promote their traditions and customs.

## **Practices in the Market**

CBM competes in the market in a loyal way and does not admit in any case deceptive, fraudulent or malicious behavior.

The search for commercial or market information is developed without violating the rules that could protect it. We reject information about competitors obtained in an irrelevant manner or violating the confidentiality under which they maintain their legitimate owners.

We are careful in the cases of incorporation to CBM of professionals from other companies in the sector in order not to violate the secrets of other companies and avoid spreading malicious or false information about competitors of the Company.

As part of the transparency that we apply in our processes, we subject to special control and supervision the unforeseen payments made to, or by third parties not mentioned in the contracts, those made in accounts that are not the usual in relations with a certain organization or person, payments made to or by persons,

companies, entities or accounts opened in territories qualified as tax havens and those made to organizations in which it is not possible to identify the partner, owner or ultimate beneficiary.

We demand compliance with regulations regarding registration processes or declarations of origin of the service, overseeing compliance with the standards and processes established by the company in this area.

### **Relations with Suppliers**

We interact with our suppliers of goods and services in an ethical and respectful manner. We select our suppliers by criteria of objectivity and transparency always looking for a profitable relationship for both, representing the interest to obtain the best conditions for the Company and promoting sustainable relationships with them.

In the same way, we expect all our suppliers to commit themselves to respect the human and labor rights of their employees, as well as to share our principles and values with their stakeholders.

Our purchasing and procurement processes are developed according to the rules and procedures established by our Company. The decisions we make are always accredited, that is, they are justifiable, verifiable and verifiable by those responsible for review and control of CBM and / or by third parties.

We protect the commercially sensitive information of our employees related to the conditions established by the company in relation to its chain of services. Likewise, we do not request or accept from suppliers information on the conditions set for other companies that compete with CBM.

### **Relationship with Government Authorities and Officials**

Our relations with the authorities and public institutions are governed by ethics and respect and at all times we comply with the legal provisions of the countries where we execute our actions, avoiding fundamentally facts related to corruption and bribery.

If we have to interact with representatives of public administrations we must have the authorization of the Company to act on their behalf. In case of having working relationships with public administrations, we must document the decisions we make and support that they comply with applicable internal and external regulations, in order to guarantee transparency in all the actions we take and

facilitate the review of the processes and compliance with rules and procedures by third parties or authorized control entities.

Keeping relationships intact is very important to us, so we do not offer, grant, request or accept gifts, favors, incentives or compensation from authorities or officials. We must know and value the customs and practices of each place where we have activities, to always act correctly and maintain the good reputation of the company. If we have doubts or concerns about the correct way to act, we should consult our supervisors or the Ethics Committee.

At all times we avoid obtaining undue advantages in fiscal matters for CBM and we make sure that the information declared to the authorities is true and faithfully reflects the reality of the Company.

### **Interest Conflict**

As employees of CBM we know how to differentiate and separate our personal interests and those of the Company, always avoiding a situation that is considered an interest conflict. For this reason, we refrain from representing it and intervening or influencing the decision-making process in which, directly or indirectly, we are related to the decision, or any person related to us participates in the process. We're aware that we will not use our position in the company to obtain personal or personal advantages or own business opportunities.

Loyalty to our Company prevents us from providing services as a consultant, counselor, manager, employee or adviser, to another competing company, except for services that may be provided at the request of CBM or with the authorization of the Ethics Committee.

CBM respects the privacy of its employees and their personal decisions. In case of conflicts of personal interest or family environment that may compromise the objectivity or professionalism of its function, it is very important that we communicate this information to the Ethics Committee, so that, with due respect for the confidentiality and privacy of the people, it is possible to proceed to the adoption of the pertinent measures for the benefit of both the Company and the persons involved.

Specifically, there are potential situations of conflict and should be reported to the Ethics Committee, the following:

- The performance by the employee or by persons linked to him, directly or indirectly, by himself or through any company or institution, of activities that constitute the same, analogous or complementary kind of activity as the one developed by CBM.
- The performance by the employee or by persons linked to him, directly or indirectly, by himself or through any company or institution, of activities that generate exchange of goods and / or services with CBM, whatever the agreed remuneration regime may be.

### **Exercise of Other Professional Activities**

Employees may only develop work and professional activities different from those performed in our Company, when they do not represent a decrease in performance efficiency as a CBM employee.

If we carry out a work or professional activity that is not directly related to CBM and that may influence the fulfillment of our working day in the Company, we must previously have the authorization of the Ethics Committee.

### **Participation in Political Activities**

Any relationship of our Company with governments, authorities, institutions and political parties will always be supported by the principles of legality and neutrality. CBM will not participate in any political activity or make political contributions, either in cash or in kind, or in Mexican territory, or in other countries.

CBM employees have the right to participate in legally recognized political activities, provided they are carried out in a personal capacity, do not interfere with the proper performance of our activity in the Company and take place outside of working hours and any CBM facility, that can not be attributed to the Company.

### **Use of property of the company**

Caring and keeping the goods and services of the Company in excellent condition is part of our commitment to CBM, therefore, we make an efficient use of them and we will not use them for our own benefit at any time.

Likewise, in no case shall we make use of the equipment that CBM places at our disposal to install or download programs, applications or contents whose use is illegal, that contravene the company's regulations or that may damage its

reputation. Nor will we use funds or company cards to support actions that are not specific to their professional activity.

It is very important to be aware that the documents and data contained in the company's information technology systems and equipment can be reviewed by authorized representatives of CBM or by third parties designated by CBM, when deemed necessary and permitted by the regulations established for these purposes, always within the framework of respect we have assumed as part of this company.

### **Confidentiality of Information and Personal Data Protection**

CBM employees have an obligation to protect the information and knowledge generated within the organization, their property or one that custody.

The collaborators will refrain from using for their own benefit any information, information or document obtained during the exercise of their professional activity. Neither will they communicate information to third parties, except in compliance with applicable regulations, company rules or when they are expressly authorized to do so. Likewise, they will not use data, information or confidential documents from a third company without their written authorization.

CBM collaborators undertake to maintain confidentiality and to make use according to the internal rules governing the matter, any data, information or documents obtained during the exercise of their responsibilities in the company. In general, and unless told otherwise, the information to which access should be considered confidential and may only be used for the purpose for which it was obtained.

Likewise, they shall not duplicate, reproduce or make more use of the information than is necessary for the performance of their tasks and shall not store it in information systems that are not property of CBM, except in the cases and purposes expressly authorized.

The obligation of confidentiality will remain once the activity in CBM is completed and will include the obligation to return any material related to the company that the employee has in his possession at the moment of the cessation of his relationship with the company.

The CBM collaborators must respect the personal and family privacy of all those persons, whether they are employees or others, to whose data they have access. Authorizations for the use of data must respond to specific and justified requests. CBM employees must strictly comply with internal and external regulations

established to ensure the correct and correct treatment of information and data provided to the company by third parties.

In the collection of personal data of clients, employees, contractors or any person or entity with which a contractual or other relationship is held, all CBM employees undertake to use the data in accordance with the authorized purpose by the grantor of said consent. Likewise, CBM employees must know and respect all the internal procedures implemented with respect to the storage, custody and access to said data and that are intended to guarantee the different security levels required according to the nature of the same.

The collaborators will inform the department or corresponding area of any incident they detect related to the confidentiality of the information or the protection of personal data.

### **Protection of Intellectual and Industrial Property**

CBM is committed to the protection of its own and others' intellectual and industrial property. This includes, among others, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction and specialized technical rights.

The employees do not use works, creations or distinctive signs of intellectual or industrial property of third parties without the proof that the Company has the corresponding rights and / or licenses.

To protect our own and others' intellectual and industrial property, we adopt the necessary measures, ensuring that the processes and decisions are documented and justifiable and verifiable, especially through the titles of the works themselves, creations or distinctive signs and the application of the contractual clauses that guarantee the originality and appropriate use of those of third parties.

The intellectual and industrial property resulting from the work of the consultants and associates during their stay in the Company and that is related to their present and future business will be considered property of CBM.

We guarantee that all operations with economic importance that are carried out in the Company, appear clearly and accurately in the appropriate accounting records that represent the true image of the transactions made and are available to internal and external auditors.

To maintain the reliability of the records, those responsible for the processes enter the financial information in the systems of the company in a complete, clear and precise manner, so that they reflect, at the corresponding date, their rights and

obligations in accordance with the regulations applicable. Additionally, it is very important to ensure the rigor and integrity of the financial information that must be communicated to the market.

### **Operations Registry**

All operations with economic importance that the company performs will appear clearly and accurately in appropriate accounting records that represent the true image of the transactions made and will be available to internal and external auditors.

The employees of CBM will reflect the financial information in the systems of the company in a complete, clear and precise manner, so that they reflect, at the corresponding date, their rights and obligations in accordance with the applicable regulations. Additionally, the rigor and integrity of the financial information that, in accordance with the regulations in force, must be communicated to the market will be ensured.

CBM is committed to implement and maintain an adequate system of internal control over the preparation of financial information, guaranteeing periodic supervision of its effectiveness. The accounting records will be available at all times to internal and external auditors. To this end, CBM is committed to making available to its employees the information that is necessary for them to know, understand and comply with the commitments established by the company in terms of internal control.

### **The spokesperson role in the Company**

Like every company that exercises corporate actions, CBM expresses or expresses public opinions about issues related to its activities and performance.

No employee of the company is authorized to publicly transmit information about the company without having been designated and authorized for such purposes, for which purpose it must submit previously to validation the information to be disseminated.

The role of transmitting the information of the company in various instances beyond the company corresponds to the General Directorate, or to the spokesperson specifically designated by it for the fulfillment of that role.

The spokesperson must always be aligned with the General Directorate about the information or opinions that it transmits and that involves data about projects, clients, patents, results, achievements and / or goals of the company.

## **Social Commitment**

The Corporate Social Responsibility of CBM, understood as its social commitment for the benefit of all its stakeholders, is an inseparable part of its business model.

CBM's social commitment is based on the development of sponsorship and social action activities, carried out by the organization or channeled through collaboration with social organizations.

Likewise, CBM will encourage and promote the collaboration of its employees with organizations of social interest in those places where it provides its services, through, among others, corporate volunteer programs.

## **Health, security and environment**

All employees are responsible for rigorously complying with health and safety regulations at work, and for ensuring their own safety and that of the people affected by their activities. They are committed to minimize the impact on the environment throughout the life cycle of their services, developing at each stage of the process, measures to reduce and compensate for that impact.

## **Code Compliance and the Ethics Committee**

### **Code of Ethics and Conduct Purpose**

The Code of Ethics and Conduct is a document that reflects our way of being, our shared values, and presents a common framework that guides us in our actions and behavior as collaborators of CBM.

Knowing, understanding and working in accordance with its guidelines is a fundamental part of who we are as CBM professionals, and its purpose is that we incorporate our principles and values in everyday decisions.

If we are presented with a situation that is not aligned with the approaches presented here, it is necessary to inform about the situation and consult the doubts before making a decision. The investigations will be conducted discreetly and confidentially and with the weight and common sense that this type of circumstance requires.

### **Ethics Committee**

There is a committee that also regulates the application and compliance with the provisions of the Ethics and Conduct codes.

## Objectives of the Ethics Committee

- Promote corporate strategies to generate the ethical environment that drives the fulfillment of CBM objectives.
- Promote the knowledge and practice of the Ethics and Conduct codes to improve the level of ethical culture of the CBM staff.
- Establish measuring mechanisms on the correct execution of the ethical principles enunciated in this Code, through the application of climate and service surveys, or other means that it deems appropriate. These surveys will help detect behaviors that may affect the healthy development of CBM activities and will serve to implement, where appropriate, strategies that strengthen compliance with the provisions of this Code.

Know and analyze the possible infractions to the codes of Ethics and Conduct that are reported.

- Know, think, analyze and instruct the corresponding areas, about the relevant cases of possible infractions to the Ethics and Conduct codes, that are reported.
- Verify the attention or execution of the sanction that is dictated for the relevant cases.

## Integration of the Ethics Committee.

The Committee is integrated as follows:

Position	Headline
President	General Manager
Vocal	Person designated by the General Manager
Secretary	Head of the Legal Area
Member	Head of the Administrative area

In the exercise of its functions, the Ethics Committee guarantees:

- a) The confidentiality of all data and records handled and the actions carried out, unless by law or judicial requirement the information is sent. The members of the Committee will sign confidentiality agreements on the topics discussed and the persons involved.
- b) The exhaustive analysis of any data, information or document on the basis of which its action is promoted.

The instruction of a procedure appropriate to the circumstances of the case, which will always act with independence and full respect of the right to a hearing and the presumption of innocence of any person affected.

d) The immunity of any complainant as a consequence of the presentation of specific complaints of good faith to the Committee.

The Ethics Committee shall have the necessary means to guarantee the application of this Code.

### **Advertising and Code Update**

It is very important that we all know the information of this Code, understand it and assume it as part of our commitment to CBM. For dissemination, it will be sent to all collaborators, and will remain posted on the CBM website: [www.cbmex.com.mx](http://www.cbmex.com.mx)

Likewise, the necessary actions will be carried out to communicate and sensitize all the stakeholders involved, internal and external, for their timely understanding and implementation.