

# ANTI-CORRUPTION

## Politic

### Goal

At **Coca-Cola 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.

## General guidelines

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 Officers.
3. As Employees, in our activities inside and outside **Coca-Cola FEMSA** or on behalf of **Coca-Cola 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 Officers 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 carry out more detailed audits/reviews of external agents, suppliers, consultants, and other intermediaries with whom we interact, and who are considered to be high risk. In the event of any suspected breach of law, including acts of corruption, the corresponding **Coca-Cola FEMSA** Legal Compliance Officer is notified immediately.
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 **Coca-Cola FEMSA** or in a personal basis to obtain any Advantage or Undue Benefit of any kind. All Gifts, hospitality, travels, or Entertainment must comply with the global standard established for that purpose.
8. We do not make donations (including sponsorships), either in a personal basis or on behalf of **Coca-Cola FEMSA** to obtain or retain business or to gain an Advantage or Undue Benefit to the company. Any contribution that **Coca-Cola FEMSA** makes must be permitted under applicable law, made to a community or organization acting in good faith and in accordance with the Internal Guidelines established to make Donations. A detailed review must be carried out by **Coca-Cola FEMSA's** Legal Department or the Legal Department of the corresponding Operation 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 Officer.
9. Political contributions made by us must not be made in exchange for obtaining an Advantage or Undue 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.
12. We establish and carry out training and communication plans, under the responsibility of the Legal Compliance Officer **Coca-Cola FEMSA** corresponding and with the support of Corporate Human Resources **Coca-Cola FEMSA** or from the corresponding Operation, aimed at preventing and raising awareness of acts of corruption to guarantee a culture of compliance with the law.



For purposes of this policy, the following terms shall have the meanings set forth herein, when used in both the singular and plural form:



**Coca-Cola FEMSA, Coca-Cola FEMSA, S.A.B.**  
de C.V. including all its Subsidiaries.



**Coca-Cola FEMSA Code of Ethics**, a document that contains **Coca-Cola 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.



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



**KOF Ethics Line**, is a formal mechanism that is used by Directors and Employees, as well as by Third Parties with whom **Coca-Cola FEMSA** has a relationship in the development of its operations, to report any breach and/or possible risk of breach of **Coca-Cola FEMSA's** Code of Ethics, **Coca-Cola FEMSA** Corporate Policies, and other Internal Guidelines as well as to address any doubts or concerns.



**Internal Guidelines**, FEMSA Code of Ethics, **Coca-Cola FEMSA** Corporate Policies, global standards, processes, procedures, work regulations, and any other internal document authorized by management to have such effect.



**Operation**, each of **Coca-Cola FEMSA's** business units, considered by country or by group of countries according to **Coca-Cola FEMSA's** organizational management, and which is led by a Chief Operating Officer; except when the Internal Guidelines refer to the Legal Compliance Officer (LCO- Legal Compliance Officer), the **Coca-Cola FEMSA** Ethics Committee or any functional area of an Operation, in which case the term "Operation" will be understood as the business units of **Coca-Cola FEMSA** considered by country.



**Coca-Cola FEMSA Corporate Policies**, documents that contain the general principles that govern the conduct of **Coca-Cola FEMSA** and its Employees in a relevant topic or area, keep order and consistency between Operations and / or mitigate critical or high-impact risks that affect the Operations, and which are authorized by the **Coca-Cola FEMSA** Chief Executive Officer, or by the Board of Directors, as applicable.