

ANTI-CORRUPTION POLICY of StructurA and its component companies

1. At StructurA, the ethical behavior of partners, consultants, employees and all those who maintain a working relationship with the company is a fundamental asset that upholds its good reputation.
2. The ***StructurA Code of Ethics*** is mandatory for partners, consultants and employees. Failure to comply, depending on the nature and severity of the action, can lead to reprimands, deductions to professional fees, fines or even dismissal.
3. All those who work in or for the companies that make up StructurA are responsible for making the Managing Partner or the Board of Directors of the company aware of any breach of the Code of Ethics by any member of any of the companies of which they have knowledge.
4. It is the obligation of the partners and members of the governing body of StructurA companies to read and understand the *General Law of the National Anticorruption System* and the *General Law of Administrative Responsibilities* of the United Mexican States, as well as to recognize the provisions of the *Foreign Corrupt Practices Act* (FCPA) of the United States of America, the *UK Bribery Act 2010* of the United Kingdom and any other applicable legislation.
5. StructurA does not tolerate and prohibits all its members from engaging in any practices of corruption or bribery to obtain any kind of advantage or influence in any sense in relationships with third parties. In particular:

- a. It is forbidden to promise, authorize, gift or offer any payment, either in cash or in kind, or provide any other benefit directly or indirectly to officials of any government, or to executives or employees of any company, in order to inappropriately influence the person receiving it and thereby obtain benefits due to their position.
- b. No type of “facilitation payments” are permitted, understood to mean any payment, however small, to any government official or private executive or employee, for the purpose of accelerating a routine task, even if it does not alter any decision made.

“Government official” refers to any employee of any government agency, from any country and at any level, as well as candidates to public office. This term includes all employees, managers or collaborators of state companies, political parties and international public organizations. “Private executive or employee” refers to any employee of any company, at any level, in any country, who works in a company in the private sector.

6. Payments made to a third party by any of the companies that make up StructurA, for the purpose of purchasing a product or hiring a service, must in no way be used to engage in any of the practices described above.
7. The partners, consultants and employees of StructurA companies are obliged to comply with all laws and regulations regarding corruption and bribery, both domestic and international, that apply to any of the company’s activities.
8. StructurA applies a “zero tolerance” policy to any act of corruption and bribery engaged in by its partners, consultants, employees or third parties linked to any of its member companies.
9. To resolve any possible violation of the provisions set forth herein or those contained in the Code of Ethics, the Board of Partners of StructurA companies will establish a committee not related to the case

in question so that they can analyze it and determine the measures to be taken.

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Date of update
to the StructurA Anti-Corruption Policy.
Mexico City, December 2018.