



CODE OF ETHICS

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CG&A Oficinas Principales:

Av. Centenario 66, Del Carmen, Coyoacán.

04100. Ciudad de México.

T. (5255) 4437-3936 / 7599-8631

www.cgcia.com

contacto@cgcia.com



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GLOSSARY

- I. **Conflict of interest:** A conflict of interest situation arises when, in professional performance, especially in decision making, the client's and/or CG&A conflicts or is influenced by one's own or personal interest, compromising criteria and objectivity.
- II. **Unfair practices:** Business behaviors that can distort the prices of goods and services in internal or external markets.
- III. **Privacy Notice:** Document through which the responsible person must inform people which personal data must be provide and with which purpose. It can be made available in physical, electronic formats, verbal media or any other technology, but always prior to obtaining and/or using the data.



OUR DECALOGUE

1. Maintain our Mission and Vision as a guide for action.
2. Promote and respect our values and ethical principles.
3. Carry out our activities in accordance with our principles.
4. Ensure customer satisfaction with our services.
5. Maintain a professional and respectful relationship with our members, partners, clients, authorities, or any third party, taking decisions based on the merits of the service offered and guaranteeing compliance with our code and any laws and/or other legal provisions.
6. Take care of and properly use assets and resources.
7. Respect laws, rules, regulations and policies.
8. Avoid establishing relationships that imply conflict of interest.
9. Protect confidential information of our members, partners, clients, authorities, or any third party.
10. Actively participate in the dissemination and compliance of the Code of Ethics and all provisions and policies regarding anti-corruption, interaction with third parties and similar.

PRINCIPLES

CG&A interactions are based on principles as:

- **Honesty.** Our actions must align to rectitude, justice and honesty, including moral integrity as a guide.
- **Integrity.** Congruence at all times between being and doing.
- **Probity.** Based on Law respect, social norms and an individual concept of morality.
- **Diligence.** Promptness, care and opportunity in acting.
- **Impartiality.** Criterion of justice that is based on decisions made objectively.
- **Good faith.** Certainty and truthfulness in acting, with good intention, without altering or damaging the rights of third parties in our relationships.

VALUES

- Job.
- Growth.
- Sustainability.
- Social responsibility.
- Efficiency.
- Knowledge.
- Experience.

STRATEGIC PURPOSE

- Help Mexico achieve an integral, transparent and attentive to avoiding any unfair practice health industry, in order to guarantee the well-being of society and responsible development with the environment, placing the patient at the center of all decisions.



PRIORITIES

- Promote an ethical culture among our members, partners, clients; authorities, or any third party.
- Consolidate our compliance and due diligence procedures with this Code of Ethics by affiliates; members; partners; customers; authorities, or any third party.
- Strengthen accountability and transparency.

BEHAVIORS TO BE OBSERVED

- CG&A must guarantee that its members, partners, clients, authorities, or any third party, comply with business ethics standards, for this reason, it may request that they comply with the necessary measures to guarantee full compliance with this Code, as well as the applicable legal provisions.
- Distinguish in business must be exemplary performance, demonstrating the highest level of professionalism, honesty and transparency in all actions and operations.
- Maintain free and impartial judgment when expressing opinions regarding any query, and maintain the confidentiality of it and of information to which have access.
- Promote growth and development of Mexico, with transparency and equity, promptly fulfilling its obligations, as well as acting with social responsibility.

MEMBERS RESPONSABILITIES

- Allow correct decision-making based on knowledge and multiplicity of options based on information's transparency.
- All members acquire the obligation to adjust their conduct and activities to the provisions contained in this Code, committing to fully comply with them and guarantee that clients, authorities or any third party, where applicable, are subject to the corporate clauses of contracts.
- Distinguish by exemplary performance, demonstrating the highest level of professionalism, honesty and transparency in all actions.
- Avoid promotion, performance or any activity tending to commit acts of corruption, and any act or omission that implies abuse of any power position, whether public or private, that generates a particular benefit, detriment of due well-being, it should be prohibited collective or individual.

CONDUCT GUIDELINES

1. Act in accordance with CG&A values, demonstrating the highest level of professionalism, honesty and transparency in all operations.
2. Respect physical and moral integrity of collaborators, as well as all people, without committing harassment and without discriminating or abusing human rights for reasons of race, nationality, sex, age, sexual preference, religious or political beliefs or because social stratum.
3. Refrain from committing fraud or stealing for any reason or situation: opportunity, pressure or apparent justification.
4. Avoid any act of bribery or corruption such as gifts, bonuses, gifts, commissions or any other tangible benefit to a person or public or private entity, national or

international, that is against law, in exchange for favoring businesses or have a personal benefit.

5. Refrain from carrying out operations in which are any conflict of interest, are against the law or company's interest.
6. Avoid falsifying information about work, including confidential and privileged information, as well as information on provided services. Likewise, refrain from providing any type of false information.
7. Refrain from using or disclosing, directly or indirectly, Confidential Information to which may have access, including personal data, or any other information to third parties, nor use it for their direct benefit or indirect, even when they stop providing their services for the contracting company for any reason.

PREVALENCE OF CUSTOMER INTEREST

We are firmly committed to maintain the highest quality standards in our services. Therefore, we strive to please our clients, with careful attention, being kind and reliable with the firm purpose of maintaining loyalty through continuous improvement of our services.

Clients are our strategic allies, on whom we support our growth and development. Maintaining a firm commitment to provide them with exemplary services contributes to our success as a Firm.

ANTIBRIBERY

CG&A rejects any corrupt practice inside and outside the Firm, so it is our obligation to avoid acts of corruption, bribery and influence peddling.

Therefore, it is prohibited for any collaborator or third party who has a relationship with CG&A, by themselves or through an intermediary, to carry out any of the following conduct, with the aim of carrying out or refraining from carrying out an act, in order to obtain or retain any unfair benefit or advantage:

- Promise, offer or deliver an incentive to a third party.
- Make use of personal, commercial and/or institutional relationships.
- Exercise any type of economic or political power.

It will be considered that there is a violation of this section, if any third party receives an incentive to alter an expected result.

CG&A has no preference or political affiliation, so the company's collaborators are committed to acting in accordance to the law, conducting with values and the highest ethical standards in our relationships with government authorities.

CONFIDENTIALITY

All CG&A collaborators have the obligation to keep any company information and documentation confidential, so they must not disclose non-public information to any third party.

Confidential information of CG&A may only be disclosed when there is a business relationship with a third party and they have a reasonable reason to know it, for which there must be a written commitment from said third party, in which they are obliged to maintain confidentiality. of the same, in accordance with the guidelines established by the CG&A Privacy Notice.

We must take the necessary measures to classify and save the information, our own and third parties, according to its importance or confidentiality, to avoid its disclosure or misuse. It is the obligation of both collaborators and all third parties who have some type of relationship with CG&A, to keep any information and documentation generated by our confidential activities, and even preserve it in this way even when our employment or commercial relationship has ended.

All the information that we generate and develop as a result of our activities is CG&A's property, so it is prohibited to make personal use of it as collaborators of the Firm.

We have the obligation as CG&A collaborators to protect confidential information of third parties that has been entrusted to us, since its disclosure could cause conflicts and affect the company's image.

COMPLIANCE WITH LAW AND REGULATIONS

CG&A is committed to conducting business with all government representatives, with scrupulous adherence to applicable laws and regulations, and with the highest ethical standards, wherever we do business.

All people who work in and for CG&A, who have a relationship with authorities, must offer them friendly and respectful treatment, recognizing their quality as such, and seeking an atmosphere of openness and trust that facilitates the discussion of matters and the establishment of agreements.

It is a primary concern to ensure that our actions at all times are in accordance, in addition to this Code of Ethics, to the principles of the applicable laws and regulations.

COMPLIANCE WITH THE CODE OF ETHICS

This Code of Ethics contains the principles that serve as a general guide for our actions in the CG&A. We must always keep them in mind, accept them as ours and apply them constantly and without exception in daily development of our work.

The application and adherence to the principles established in this code represent both a right and an obligation. Therefore, all CG&A members must review its content and scope to be clear about what must be done to fully comply with what is stipulated therein.

Strict compliance with this code is the responsibility of all CG&A members.

The Code of Ethics was created as a tool for daily decision-making, so we will contribute to its success by complying with its provisions and providing ideas for its constant improvement.

Every member of CG&A, especially those who perform management, leadership or supervisory functions, has the obligation to be an example of compliance with this Code of



Ethics and not allow violations of ethical standards, practices and behaviors established here and in other associated or complementary policies.

Those who perform management, leadership or supervisory functions have the obligation to make the content of the Code of Ethics known to all their staff, promote it and ensure that everyone reads it and makes it a daily practice in their activities, in their conduct. and behavior towards different interest groups.
