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STATEMENT FROM OUR CEO

To the UNIFIN Community,

Since 1993, **Unifin Financiera, S.A. de C.V.** and its subsidiaries and affiliates (jointly, "Unifin") **UNIFIN** has been distinguished for supporting our clients with the highest quality in our financial services. Our accomplishments have been a result of the professionalism of our great team.

Over time, **UNIFIN** has maintained its values and principles strong, achieving to be a leader company in the market, focused on promoting a fair and equal development in Mexico through a strong business model.

In **UNIFIN** we foster guidelines that contribute to protect the integrity of our collaborators, directors, shareholders, clients and suppliers; thus, ensuring the honesty and transparency in each of our interactions.

UNIFIN's strength comes from our five powers: "Live for the client", "Believe in yourself", "Learn from everyone", "Be better than yesterday" and "Do more with less". These powers redefine our purpose of transcending and contribute additional value to our actions.

This new version of the Code of Ethics restates the ethical principles that guide all our actions and decisions, as well as the commitments that each member of the **UNIFIN Community** undertakes, to continue being a successful company.

This Code of Ethics unifies criteria and sets forth a framework of common reference that sets the path for the manner establishing how we shall behave and live our principles and values, which will distinguish the daily behavior of our collaborators, reflecting at all times the honesty, commitment, passion, and clarity in our service. It is our responsibility to have knowledge of its content, to understand it, and to implement it at all times, immediately reporting any irregularity through the corresponding channels.

When the Powers form part of everyday actions, they are manifested as a competitive advantage, that not only helps us be in a better position in the market, but that it also makes us honest and accountable, vis-à-vis, the community.

Sergio Camacho CEO







About

Purpose

Provide the ethical principles that guide the behavior of the collaborators, directors, shareholders, clients and suppliers of **UNIFIN**, with the purpose of ensuring that our operation is based on ethics and quality of service standards.

Scope

This Code of Ethics is generally applicable to our collaborators, directors, board mem-bers and shareholders of the companies comprising **UNIFIN**, and its Stakeholders; ignorantia juris non excusat.

This is a non-comprehensive document which does not includes all situations that may exist in which there could be ethics conflicts; thus, the situations set forth in this Code shall be solved in accordance with 'best practices criteria' and customer service; in the event of any doubt, the Ethics Committee shall be consulted.

The Code of Ethics us an integral part of the Integrity Policy of **UNIFIN**; thus, this Code of Ethics is consistent with, and complements, the Anticorruption Compliance Program and the Compliance Organizational Handbook of **UNIFIN**.

^{*} Stakeholders means investors, clients, consultants, suppliers, and all directly or indirectly related parties of UNIFIN.

ORGANIZATIONAL CULTURE

Our Purpose

- Power to Transcend inasmuch we help to boost the economy, the development and progress of our clients and the country.
- Is the capacity to use skills to do and control to achieve extraordinary milestones.
- We finance dreams to make it come true and, thus, positively impact millions of persons.
- Power is talent and talent growths, develops and helps to achieve all planned goals

POWER to transcend TOGETHER

Our Powers



LIVE FOR THE CLIENT

You deliver value with your work since you have what the client needs, even before they realize it. The biggest challenge is the client's satisfaction in each of our actions.



LEARN FROM EVERYONE

The most enriching knowledge comes from the mixture of everyone's experiences. We all contribute our perspective and knowledge to find the best solution to a problem. Nobody knows everything but everyone knows something.



BELIEVE IN YOURSELF

There is a reason of why you work here. We have seen your skills and potential to overcome any obstacle. You solve every challenge with creativity and innovation. Trust in yourself. We already have our trust in you.



BE BETTER THAN YESTERDAY

True knowledge and excellence are achieved through actions we continuously performed. Thus, being the best is not the end of the journey, is just a habit that we need to practice on a daily basis.



DO MORE WITH LESS

We keep growing since we are fast paced and efficient in our control processes. We have the same rules than others, yet we give more freedom.

Our Commitment With Our Values

- In **UNIFIN** we are distinguished for being a leading company in our sector. Since our incorporation, we undertook the commitment to provide excellent services, contributing to the development of our country. Our efforts have been recognized by national and international institutions such as **Global Banking & Financial Review, Great Place to Work and Mexican Center for Philanthropy (Centro Mexicano para la Filantropía).**
- The Code of Ethics contains a set of provisions governing, at all times, the conduct of the UNIFIN Community and its Stakeholders.
- Each member of the **UNIFIN Community** is responsible for knowing and understanding the values and principles set forth in this Code.



COMMITMENTS; ETHICS AND CONDUCT GUIDELINES



"In **UNIFIN** we foster guidelines that contribute to protect the integrity of our collaborators, directors, shareholders, clients and suppliers; thus, ensuring the honesty and tansparency in each of our interactions."

Sergio Camacho CEO

COMMITMENTS WITH OUR PEOPLE

Work Environment, Equality, Respect and Inclusion

In **UNIFIN** we acknowledge that the talent of persons goes beyond the physical characteristics or preferences of any type; we are focused on promoting a work environment based on respecting our diversity and equality. Consequently, we have established guidelines providing a healthy coexistence between the parties involved. In such respect, we set forth that in the institution the following are unacceptable:

- Any discriminatory act related to race, religion, nationality, ethnics, gender, age, marital status, social class, sexual orientation, disability, or title, or any other attacking human dignity and aiming to step-on or impair the rights and freedom of persons.
- Sexual, labor, verbal or physical abuse or harassment behavior.
- Harassment to collaborators.
- Any type of violence at the workplace, including, without limitation, emotional or physical/psychosocial.

Equality of Professional Opportunities

UNIFIN supports the talent of the collaborators, promoting their professional training and development. The leaders of the institution encourage the members of their teams, ensuring equal opportunities and relying on clear measurement criteria and scope of objectives.

Safety and Health in the Workplace

In order to achieve a safe and physical, psychological and emotional well-being workplace, **UNIFIN** promotes and fosters a work culture with the highest safety and hygiene standards, adhering to the Civil Protection guidelines, in order to prevent and minimize labor risks.









OUR COMMITMENT WITH OUR ORGANIZATION

Safeguard of UNIFIN's Assets

The **UNIFIN Community** and its **Stakeholders** protect and safeguard the assets owned by the company by using them efficiently and responsibly at all times.

The **UNIFIN Community** promotes the proper use of email, internet, software, digital files, and its technological assets for the performance of its activities.

The information generated in **UNIFIN** is deemed to be intellectual property to be exclusively used by the company.

All the information and documentation included in the assets or work tools provided by **UNIFIN** are only owned by **UNIFIN**; thus, **UNIFIN** may, whether directly or through any third-party elected by the sole discretion of **UNIFIN**, review and/or audit such information without requiring a previous notice delivered to, or authorization from, the respective Collaborator.

All the information, documentation and communications generated and/or included in such means may be used by **UNIFIN**, by its Ethics Committee to conduct any investigation, and for any investigation or judicial proceeding of any type, including criminal, administrative, civil, commercial, as well as for any other purpose the Ethics Committee deems convenient.

"UNIFIN" Image and Brand Preservation

Inasmuch it is a registered trademark, no person shall use the logos, slogans, trade names, advertising campaigns, related trademarks, images or the name of **UNIFIN**; consequently, any use of the intellectual property of **UNIFIN** shall have the express and written approval of the CEO and/or the Business Innovation Executive Director.

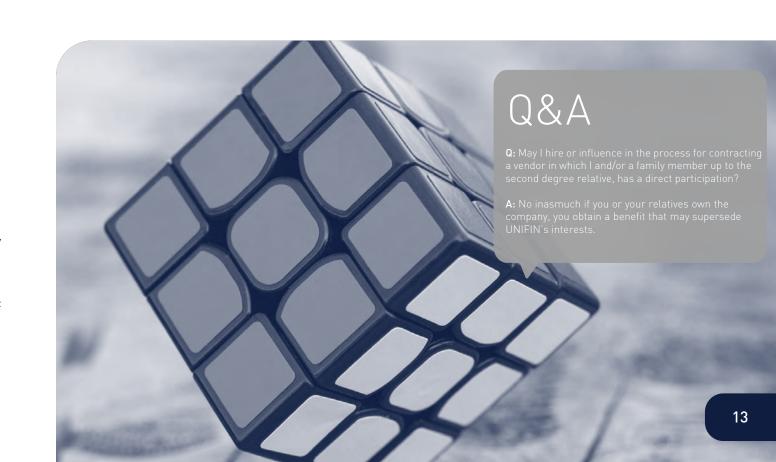
Conflicts of Interest

To avoid any potential conflict of interest in Related Parties Transactions or transactions of Material Amounts, the **UNIFIN Community** shall comply with the Related Parties Transaction Policy of **UNIFIN**. The board members, directors, and collaborators:

- 1) Shall refrain to participate and influence in decisions regarding the engagement of companies owned by their direct family members (up to second degree).
- 2) Shall refrain from having interests and/or investments in companies competing with UNIFIN, in which they may have a material influence.
- 3) If they participate in Boards of companies other than **UNIFIN**, they shall so notify it to the Compliance Office which shall, in turn, notify the Board of Directors.
- The directors and collaborators:
 - 1) Are prohibited from hiring family members whether direct, politics, or in-laws to be supervised by them, unless in those cases authorized by the Ethics Committee.
 - 2) In case of carrying out supervision, control or audit activities to departments of **UNIFIN** which are under the direction of a family member, they shall notify this to the director of the department for them to be replaced in such responsibility.

In no event a member of the **UNIFIN Community** may simultaneously hold a governmental official or political office, nor be a political candidate.

For such purpose, each member of the **UNIFIN** Community shall comply with the conflict of interest guidelines set forth in the Anticorruption Compliance Program of **UNIFIN** and shall sign the "declaration of no conflict of interest" or a "declaration of conflict of interest", as applicable, using the forms included in the aforementioned Anticorruption Compliance Program for such purposes.





Compliance

The **UNIFIN Community** and its **Stakeholders** are committed to comply with laws, regulations, and external and internal standards, providing guidance on the form in which the objectives of the company shall be met, under a trustworthy and institutionalization framework.

Recruiting Family Members

It is strictly prohibited to recruit direct family members, by blood or in-laws, up to the second degree, mainly for positions reporting to a person, unless otherwise authorized by the Ethics Committee.

Corruption, Extortion, and Bribery

In **UNIFIN**, corruption, extortion and bribery conducts are prohibited and severely sanctioned in considering the circumstances and the applicable criminal, administrative, civil or labor responsibilities.

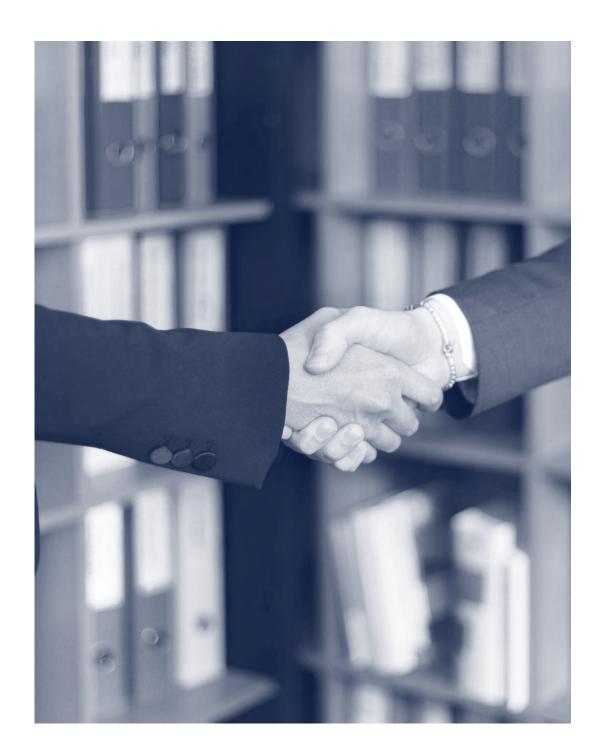
Each and all members of the **UNIFIN Community** and its **Stakeholders** shall comply with the Anticorruption Compliance Program of **UNIFIN**.

Pursuant to the above, the following is prohibited:

- Directly or indirectly request or accept gifts of excessive amounts.
- Offer any benefits and/or personal consideration in favor of public officers or employees of authorities (national or foreign) for obtaining or retaining business, benefits and resolutions in favor of **UNIFIN.**
- Receive unlawful payments or pay bribes to entities, persons, authorities or governmental authorities to ensure any agreement, concession or approval for personal benefit or for the benefit of UNIFIN.
- Extend invitations or any social act for public officers (national or foreign) that may raise misinterpretations, risking the ethics and integrity of **UNIFIN**.







Professional Ethics

All persons of the **UNIFIN Community** and its **Stakeholders** are expected to:

- Have a professional and honest behavior in the facilities of **UNIFIN** and outside its facilities.
- Refrain from participating, on behalf of **UNIFIN**, in transactions associated or related in any manner, with personal or familiar interest or in those having an unlawful source.
- Refrain from having influence in the approval of credit facilities or services in which they have such interest.
- Refrain from having relationships with clients, other than those strictly related to the financial products offered by **UNIFIN**.

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Fraudulent Information

Fraudulent information is information that is altered or misleading, with the purpose of distorting real information; thus, it is prohibited in **UNIFIN** to:

- Misrepresent or fabricate information of **UNIFIN**.
- Accept false or altered information of a client, its suppliers and/or its related persons, as well as to register them in the computer systems of **UNIFIN** with differences in their information.
- Carry out internal fictitious transactions.
- All the financial transactions shall be clearly and precisely recorded in the accounting registers which shall be available to the Board of Directors and the Internal and External Auditors.

Q&A

Q: I requested an advance for my travel expenses and when I review the tickets, I registered invoices of expenses I did not incur into. Is this deemed to be fraudulent information?

A: Yes, providing false information or altering registries is deemed to be fraudulen information.



Right to freely participate in Political Activities

In **UNIFIN** we respect the political preferences of the **UNIFIN Community**, without influencing or inhibiting the freedom of choice or freedom to participate in political acts or activities, to the extent persons act on their own name and not on behalf of **UNIFIN**.

Q&A

Q: If I attend to an event organized by the political party of my choice and I wear clothes with the LINIFIN logo is this a conduct infringing the Code of Ethics?

A: Yes, the aforementioned conduct is subject to sanction. By wearing clothes wit



Use of Confidential Information

Confidential information: is such information that, if known, could give advantages to competitors or that may affect third parties, where those situations are in detriment of **UNIFIN**, its clients and employees. **The UNIFIN Community** and its **Stakeholders** shall refrain from disclosing such information (including but not limited) related to:



- Plans with new partners and shareholders.
- Changes in Management of **UNIFIN**.
- Handbooks, policies, authorities, and operational procedures.
- Identity of the clients, as well as the type and extent of the business **UNIFIN** has with them.
- Any information included in the documents marked as confidential and/or personal information.
- Results of financial, accounting, anti-money laundering and anti-terrorism, marketing, legal, and any other type of analysis, exclusively prepared for **UNIFIN**.
- Notice of persons in Anti-Money laundering and Anti-terrorism lists.
- Information of clients, suppliers, collaborators, directors, board members, investors, and shareholders.
- Projects, technological and informative systems, as well as drafts developed or created in **UNIFIN** as a result of its professional activity or a third party's professional activity.
- Organizational changes.
- Personal data of the UNIFIN Community.

The **UNIFIN** Community and its **Stakeholders** agree to safeguard all type of information related to **UNIFIN**, abiding themselves by professional secrecy thereof.

The confidential information shall only be disclosed upon an express, reasonable, and legal requirement issued by authorities.

It is prohibited to use the confidential information of **UNIFIN** for personal purposes or for the benefit of a third party. The confidential information shall only and exclusively be used for the performance of their professional activities at **UNIFIN**.

Q&A

Q: I have access to the Strategic Plan of the company as a director of UNIFIN. May share this information with third parties?

A: No, the information of the company is owned by UNIFIN and by disclosing the information to third parties, our competitors may have advantages.

The information owned by UNIFIN can solely be disclosed to authorities upon a written request; a non-disclosure agreement shall be signed when sharing information with third parties.





Anti-Money Laundering (AML)

In **UNIFIN** we are committed to comply with the current Anti-Money Laundering and Anti-Terrorism provisions.

The Board members, directors, and collaborators of **UNIFIN** shall comply with the Operative Handbook to prevent, detect, and report transactions from unlawful sources and financing terrorism, which describe the criteria, mechanisms, procedures, and policies on this topic.

Prohibition to make contributions with political purposes

The UNIFIN Community cannot and shall not receive contributions or donations, in cash or in- kind, in relation to political and/or electoral activities for and to UNIFIN.

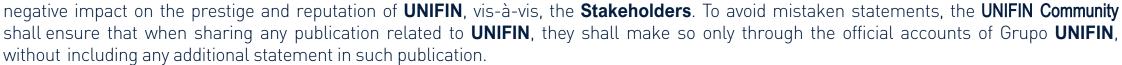
UNIFIN neither promotes the participation in political campaigns nor grants gifts, contributions or political donations, whether directly or indirectly, to any government, candidate or political party.

Social Media

The **UNIFIN Community** shall neither disclose, through personal social media profiles, information related to **UNIFIN** nor of its corporate or commercial matters, including advertisement, news, or communications.

The marketing, promotional, product campaigns and information related to **UNIFIN**, are published through the website, social media profile of **UNIFIN** (official accounts) and other channels authorized for such purposes; additionally, the corresponding approval from the CEO or the Business Innovation Executive Director shall be obtained for their distribution.

The **UNIFIN Community** shall handle with special care their personal social media to refrain from making false or mistaken statements, disclosure of information or comments that may have a



The collaborators, directors, shareholders, or board members of any of the companies comprising **UNIFIN**, shall not make a reference to their positions, responsibilities and institutional matters, so that their opinions, recommendations or decisions are deemed to be only and strictly of personal nature.



Q&A

Q: I work in the business department and I use several social media in which I have a lot of contacts. Can I use my accounts to promote UNIFIN's products?

A: No, the information you post on your social media accounts are on a personal basis and the information of UNIFIN can only be posted in the official social media accounts of the company.

COMMITMENT WITH STAKEHOLDERS

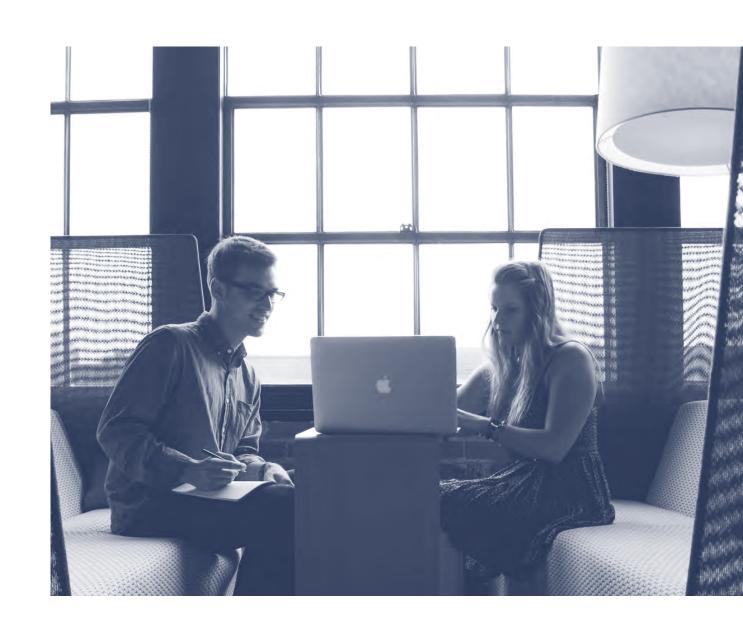
Relationship with Clients

The collaborators and directors of **UNIFIN** are committed to high quality and excellent services to its clients, ensuring equal, honest and respectful treatment.

Except with the written authorization of the CEO of **UNIFIN**, no collaborator or officer may accept, in a personal capacity, fiduciary duties, mandates or powers of attorney of clients, except for those resulting of a contractual relationship with **UNIFIN** derived from the provision of services rendered by **UNIFIN**.

The **UNIFIN** Community shall refrain from providing false information or making misleading comparisons of our services, vis-à-vis, our competitors.

In no event, an anticompetitive act/unfair competition is promoted through conducing transactions with a client with the purpose of benefiting a third person, unless both parties understand their different positions and expressly accept carrying out the transaction and, if any, must inform the client of the economical or any other type of relations that could imply a conflict of interest with and among them.



Relationship with Suppliers and Advisors

The **UNIFIN Community** and, especially those involved in services or supply procurement decision-making process, and for establishing economic conditions, shall avoid any type of interference that could affect their impartiality or objectivity. They shall neither request nor receive gifts or economic considerations in exchange for securing an agreement.

Those having a sound reputation of equality and integrity compliant with social and environmental criteria are considered in the suppliers and consultants' portfolio.

The selection of suppliers and advisors is made impartially, based on quality, profitability and service criteria.

Exclusivity relations are avoided to the extent possible.



Relationship with Investors

The **UNIFIN Community** tries to offer a sustained profitability to our investors; while undertaking a commitment to advice with honesty and integrity, and to protect the interests of **UNIFIN**.





Relationship with Competitors

The **UNIFIN Community** and, especially those involved in the promotion of products and services, agree to carry out a loyal and honest competition.

No advisor, competitor or member of **UNIFIN** shall slander the competition, based on false or unsupported information, generating confusion among clients with respect to the products and services of our competitors. It is prohibited for advisors to render services to UNIFIN's competition.

Relationship with Insurance Companies

The **UNIFIN Community** and, especially those involved in transactions with insurance companies, agree to provide an honest and respectful treatment in each application, consultation or transaction.



Relationship with Authorities and Regulators

UNIFIN adheres to all applicable laws and regulations; consequently, the **UNIFIN Community** acts with respect and in full cooperation with the representatives of the authorities within the framework of their jurisdictions.

The information requirements or execution orders are recorded as soon as they are received and, shortly thereafter, they shall be forwarded to the CEO to expedite the corresponding procedure.

In accordance with the terms of the Integrity Policy of **UNIFIN**, to the extent there is a requirement from the authorities, the collaborators and directors of **UNIFIN** collaborate with competent authorities in the exercise of their duties and defend the legal interests of **UNIFIN**.

COMMITMENT WITH OUR ORGANIZATION

UNIFIN Association and Donations

UNIFIN is committed to help and support those in need. For purposes of creating new opportunities, **UNIFIN** has been involved in solidarity efforts with our society, through **FUNDACIÓN UNIFIN, A.C.**, actively participating with its volunteer work.

For transparency purpose of the donations it receives, **UNIFIN** complies with internal policies, laws and provisions in force in order to make such donations, investments, or similar activities.

Environment

As part of our social responsibility commitment, we recognize the protection and conservation of the environment, and we focus our efforts in fostering an environmental care and preservation culture, while adhering to applicable programs and regulations.

UNIFIN has a commitment to safeguard the environmental footprint and supports pro-environmental initiatives.



ETHICS COMMITTEE





"When the Powers form part of everyday actions, they are manifested as a competitive advantage, not only helping us to be in a better position in the market, but also making us honest and accountable, vis-à-vis, the community."

Sergio Camacho CEO

Ethics Commitee

UNIFIN has created an **Ethics Committee** to strictly comply and supervise the items set forth in this code. The main duties and responsibilities of such committee are:

• Implement conduct and ethics rules.

- Address, follow-up and solve all denouncement claims related to the Code of Ethics.
- Review and, if applicable, update the Ethics Code.

- Jointly with the Human Resources and Compliance departments, promote the distribution and training plans ensuring that this Ethics Code and the other policies related to the Integrity Policy of UNIFIN are not mere documents but, rather, for them to become an institutional culture and philosophy.
- Establish and enforce the sanctions for the breach of this Ethics Code.
- Promote an enterprise culture based on ethics principles.

The Ethics Committee is integrated by directors having extensive professional experience and moral etiquette, who shall maintain full discretion of all the cases received and managed by the committee.

The following email is established for purposes of having communications with the Ethics Committee, to solve queries and address suggestions to this code: **comite.etica@unifin.com.mx**.



Corporate Governance

To support the confidence of our investors, **UNIFIN** has adopted the best administrative and corporate governance practices to achieve an effective communication among the Board of Directors, the Committees, Management, the Shareholders and its Stakeholders, which results in operational accountability, equality and transparency. As a public company, **UNIFIN** sets forth and adheres to a series of guidelines:

- We protect the rights of all our shareholders.
- Our Audit and Corporate Practices Committee is exclusively integrated by independent members to ensure objectivity and impartiality.
- The other corporate governance bodies have different level of independent supervision.

Did you know?

Did you know that since that UNIFIN is a public company, UNIFIN is committed to adopt the best Corporat Governance practices?

Yes, on the annual report submitted to the Mexican Stock Exchange we report our adherence to the best corporate practices policies which identifies us as a company ensuring accountability, equality and transparency, vis-à-vis, all our stakeholders.





RESPONSIBILITIES

Board Members

• Execute the "Letter of Acceptance of Integrity Policy".

Ethics Committee

- Approve the Code of Ethics and its revisions.
- Supervise the compliance of the provisions of this Code of Ethics, Integrity Policy and other policies relates.
- Establish the applicable sanctions upon breaches to the guidelines set forth in the Code of Ethics.
- Establish a communication program to make this Code of Ethics known to all and to ensure the compliance of its policies, and to enforce the sanctions upon a breach.
- Verify with the Audit Committee the appropriate operation of the complaints systems
- Ensure the training and reinforcement plans on business ethics matters are carried out.

Directors and Collaborators

- Execute the "Letter of Acceptance of Integrity Policy".
- Have knowledge and comply with the guidelines of the Code of Ethics, Integrity Policy and other policies relates.
- Promote the Code of Ethics and its compliance.



Human Resources

- Inform about the existence of the Code of Ethics ensuring a proper knowledge of its principles and values.
- Ensure that the Board members and Directors execute the 'Acceptance Letter of Integrity Policy'.
- Include topics covered in the Code of Ethics in the induction program.
- Inform the changes made to the Code of Ethics.
- Inform the Denouncement System procedure.

Chief Compliance Office

- Prepare and design amendments to the Code of Ethics allowing UNIFIN to be up to date considering the values and principles of the Institution.
- Follow-up the corrective measures adopted by, or sanctions issued by, the Ethics Committee when solving denouncements.
- Review and update the Ethics Code.





REPORTING MECHANISMS AND SANCTIONS

Reporting Mechanisms

In the event that any collaborator, officer, supplier or client has knowledge of unlawful actions or is aware of signs of oversights to this code, he/she shall immediately report such situation through the different anonymous reporting channels.



UNIFIN Mailbox unifin@tipsanonimos.com



Website www.tipsanonimos.com/unifin



Toll-free number **800 717 1196**

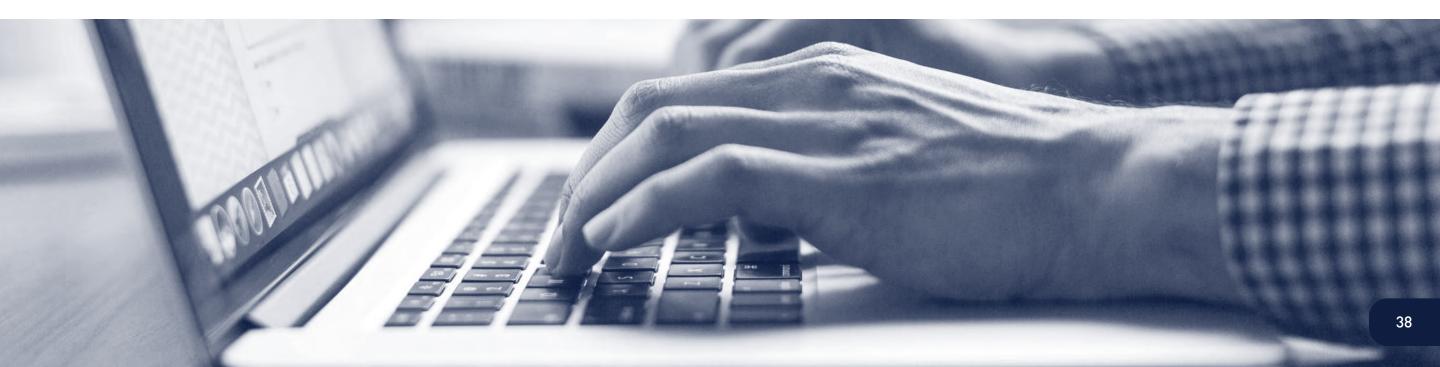


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Reporting Mechanisms

- Such communication channels seek to foster the honesty, integrity and commitment of the collaborators and directors **UNIFIN** and allow the **UNIFIN Community** and its Stakeholders to make report any event which violates this Code.
- The denouncements shall be addressed externally by a third party with sound experience in these types of services, which constitutes an objective, safe, impartial and confidential means for denouncements to be made.
- The reporting channels are available and are served 24 hours, year-round (365 days).
- Full confidentially of the whistleblower is guaranteed. The person providing information or collaborating with any investigation where a presumption of a violation of the provisions set forth in this code or of any corporate governance is analyzed, cannot be subject to dismissal, suspension, or retaliation for this cause, unless there is bad faith when providing such information or if he/she has the intention to affect an innocent person.



Sanctions

- The Ethics Committee evaluates the violation to determine the type of sanction in light, at all times, of the then-current Interior Labor Regulations and the Disciplinary Guidelines for Breach of the Integrity Policy.
- The sanction will vary from an administrative minute up to termination of the employment agreement, without prejudice that such event shall be directed to the corresponding authorities with whom **UNIFIN** will establish collaboration and cooperation mechanisms, in accordance with the **UNIFIN** Integrity Policy.



DEFINITIONS



Definitions

Below are some conducts and/or situations that may be subject to denouncement through the channels indicated in this documents. Those situations not indicated below but that are subject to a denouncement report, will be analyzed by the Ethics Committee:

Breach of confidence: When a person or group of persons misuses the trust deposited by the company on them when granting them certain privileges or decision-making authorities, using those for a personal, professional or economic, benefit without being authorized to do so, and, thus, causing damages or loss of profits.

Sexual Harassment: Refers to any sexual verbal or physical behavior, with the purpose of undermining the sexual freedom of a person, creating an intimidating, hostile, degrading, humiliating or offensive environment within of labor relationship or the rendering of services.

Unethical benefits or dealings with suppliers and contractors: Any type of negotiation in which a board member, director, or collaborator of UNFIN is involved with a supplier which includes the acceptance of any benefit for any of the parties to favor or speed-up a process or contract. Likewise, when a supplier reports that an inadequate service is being provided to it in connection with the services rendered by the supplier to the company.

Unfair competition: Any practice intended to obtain market advantages through activities such as: false or misleading advertisement,

establishing sales contracts exclusivity with distributors, or adopting any other means taking advantage, unfairly and in bad faith, of the situation of a competitor.

Risky safety conditions: Refers to the poor condition of, both, the work equipment and the facilities (connections, machines, fire extinguishers, etc.) or the failure to have them. Likewise, it refers to the workplace conditions or to omissions risking the physical integrity of the collaborators.

Conflict of interest: Events in which the judgment and objectivity of one or more persons tends to be influenced by a secondary interest, generally of an economic or personal nature. Specifically, a conflict of interest exists when in the exercise of duties, a personal benefit overlaps the interest of **UNIFIN**.

Discrimination: Any act which, directly or indirectly, entails a distinction, exclusion, or restriction against a person, based on race, color, gender, ethnicity, age, disability, religious beliefs, sexual orientation or any other condition, having as a purpose to limit their freedom and human rights, altering equal opportunities or treatment.

Disclosure of personal data of clients, suppliers, and collaborators: Provide non-public personal information of clients, suppliers or collaborators to third parties, without their express authorization to do so or for failing to have knowledge of applicable laws.

Lack of social commitment: Damage caused to the community or part thereof, derived from actions or omissions of a person or a group of persons, which may cause a negative impact on the reputation or image of UNIFIN.

Fraud: Any illegal act involving deception, concealment of information or improper use of authorities, committed by one or more persons, taking advantage of detected control weaknesses and for their own economic benefit.

Harassment to collaborators: When a person or group of persons exercise to another person or group of persons, verbal or physical violence, in a systematic way in the workplace, causing psychological damage to them.

Breach of laws or regulations: When certain action or behavior violates any regulation issued by authorities, including a local, state or federal law, as well as internal policies.

Accounting irregularities: Any distortion or omission in the accounting document of a company, including accounting records, financial reports, corporate books and records, and/or information produced by an accounting system.

Improper use of confidential information: Refers to the disclosure of confidential information of **UNIFIN**, whether caused by an error, a careless act or whether made intentionally.

Manipulation or falsification of company records: Unauthorized modification or reproduction of company documents, such as: list of attendance, productivity registries, reports, alterations of travel expenses, etc.

Labor negligence: Careless, lack of effort or lack of work by a collaborator when carrying out his/her duties.

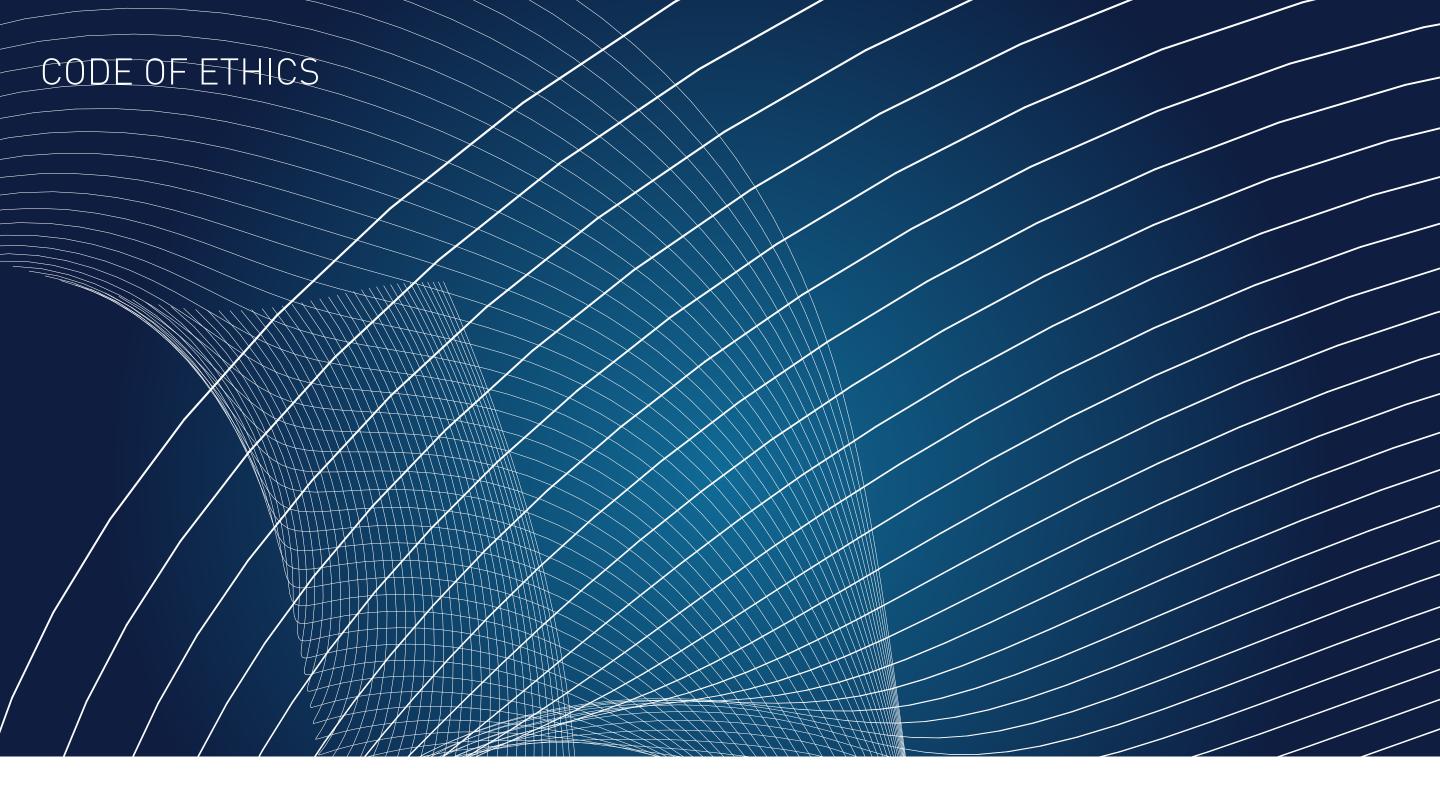
Retaliation: Any suppressive or vindictive act against a whistleblower or person related to the whistleblower, based on the denouncement made by him/her.

Robbery: Seizure or extraction of assets owned by UNIFIN, without having the express authorization to do so and with the intention of holding or owning it.

Bribe: Act implying any person or entity accepting or requesting a gift in exchange for performing or not performing certain action; i.e., a promise, offer, request, delivery or reception of anything of value or a benefit that may influence decisions during a bid process or for the execution of an agreement.

Misuse of assets: Using the assets owned by UNIFIN for a purpose other than for which those assets were acquired or for personal benefit, or when the policies of use are not complied with.

Violence in the workplace: Behaviors, ranging from physical to psychological abuse among employees, which may be exercised by persons at the same or at different hierarchical level.





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