

# CODE OF ETHICS



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# Code of Ethics Manifesto

## To the UNIFIN Community\*,

Since 1993, at UNIFIN, our steadfast objective has been to empower our clients by promptly addressing their needs. Equipped with the necessary skills, resources, and knowledge, we aspire to achieve extraordinary feats, even amidst adversity and challenging environments.

Our work model has facilitated our progress, aligning with our Powers: "Live for the customer," "Believe in yourself," "Learn from everyone," "Do more with less," "Embrace diversity," "Promote sustainability," "Act with transparency," and "Be better than yesterday." These Powers define our transcendent purpose and imbue value into each of our endeavors..

We are defined by our collaborative spirit, working together as a team and as individuals capable of growth, development, and achieving remarkable results, propelling the advancement and progress of the entire UNIFIN Community. Today, we proudly attribute each of our accomplishments to the professionalism of the remarkable team that comprises the UNIFIN community.

Hence, we advocate for standards that safeguard the integrity of the entire UNIFIN Community, fostering honesty and transparency in all our interactions. Furthermore, we are dedicated to upholding social responsibility and contributing to environmental betterment.

This latest iteration of the Code of Ethics reaffirms the ethical principles and commitments that each member of the UNIFIN Community embraces to sustain our status as an exemplary company. Within this document, we consolidate criteria and establish a framework to guide our conduct, reflecting honesty, integrity, and transparency in every decision and interaction with our diverse stakeholders.

We urge you to thoroughly peruse our Code of Ethics because, as a UNIFIN community, it is incumbent upon us to acquaint ourselves with it, comprehend its tenets, and apply them consistently, promptly reporting any irregularities through the designated channels.

Each member of the UNIFIN community must exemplify our ethical dedication, as it constitutes a fundamental pillar for UNIFIN's enduring success.

\* We define the UNIFIN Community as comprising Employees, Executives, Directors, and Shareholders of the UNIFIN Group, as well as Stakeholder Groups.



# About the Code of Ethics

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## Aim

To establish ethical principles guiding the conduct of UNIFIN's employees, executives, shareholders, clients, and suppliers, ensuring our operations adhere to high standards of ethics and service quality.

## Scope

The Code of Ethics applies broadly to employees, executives, board members, and shareholders of UNIFIN-affiliated companies, as well as to their Stakeholders\*; ignorance of its contents does not exempt individuals from the obligation to comply with it.

This document is not exhaustive and does not encompass all situations that may entail ethical conflicts. Consequently, situations not explicitly addressed in this Code will be resolved based on criteria of best corporate practices; when in doubt, consultation with the Ethics Committee is advised.

As an integral component of UNIFIN's Integrity Policy, this Code of Ethics aligns with the principles outlined in the Integrity Policy and the Compliance Organization Manual of UNIFIN.



\* We define the UNIFIN Community as comprising Employees, Executives, Directors, and Shareholders of the UNFIN Group, as well as Stakeholder Groups.



# Mission and Vision

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## Mission

Empower Mexican SMEs, propelling them to achieve extraordinary results through our timely support, while also addressing the needs of our clients, employees, investors, and other stakeholders.

## Vision

Being the leading company in the Mexican market, recognized for fostering the success of our clients, employees, investors, and other stakeholders, accompanying them to transcend, improve, and continually grow, thereby achieving sustained long-term success.







# Organizational Culture

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**POWER**  
to transcend  
**TOGETHER**

## Our Purpose

- Power to transcend, as we contribute to driving the economy, development, and progress of our clients and the country.
- It's the ability to do and possess the skills to accomplish extraordinary feats.
- We finance dreams to transform them into realities, thereby positively impacting millions of people.
- Power is talent, and talent flourishes, evolves, and aids in achieving all established goals.



# Our Powers



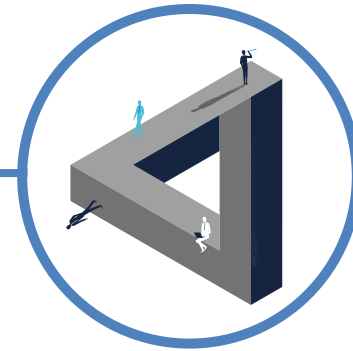
## Live for the Customer

You deliver value through your work because you possess what the customer needs, often before they even realize it themselves. The greatest challenge lies in maintaining customer satisfaction in each of our actions.



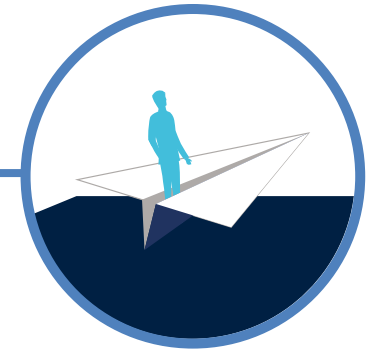
## Believe in Yourself

If you're here, it's because we've recognized your abilities and potential to overcome any obstacle. With every new challenge, you demonstrate creativity and innovation. Trust in yourself; we already do.



## Learn from Everyone

The most enriching knowledge arises from the amalgamation of everyone's experiences. We contribute our perspectives and knowledge to find the optimal solutions to any problem. No one knows everything, but everyone knows something.



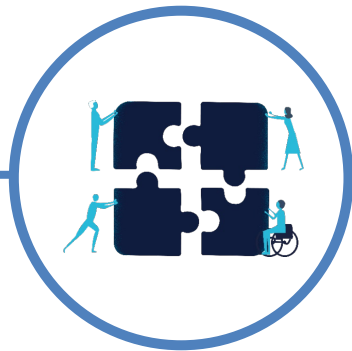
## Do More with Less

We consistently expand because we operate with speed and efficiency in our control processes. While adhering to the same rules as others, we enjoy more freedoms.



## Be Better than Yesterday

True growth and excellence stem from the actions we consistently take. Therefore, being the best is not the end of the journey but a habit we must practice every day.



## Embrace Diversity

Differences enrich us and offer new perspectives. Everyone, regardless of who they are or what they do, is treated with respect. We provide equal opportunities, irrespective of gender, age, religion, nationality, sexual orientation, race, or personal interests.



## Promote Sustainability

We utilize our resources efficiently, striving for a harmonious coexistence with our environment, minimizing negative environmental impacts, and adding value to our employees, clients, and society.



## Act with Transparency

All our actions are governed by the UNIFIN Code of Ethics; therefore, honesty, integrity, and transparency guide every decision and interaction with our diverse stakeholders.


# Our Commitment

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- At UNIFIN, we distinguish ourselves as a leading company in our segment. Since our inception, we have been committed to providing 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 the Mexican Center for Philanthropy.
- The Code of Ethics contains a set of principles that always govern the conduct of the UNIFIN Community and its Stakeholders.
- It is the responsibility of each member of the UNIFIN Community to know and understand the guidelines established in this Code.





# **Commitments and Standards of Ethics and Behavior**

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**At UNIFIN, we promote standards that contribute to protecting the integrity of our employees, executives, shareholders, clients, and suppliers, thereby ensuring honesty and transparency in all our interactions.**



# Commitment to Our People

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## Work Environment, Equity, Respect, and Inclusion

At UNIFIN, we recognize that people's talent transcends physical characteristics or preferences of any kind. We are committed to fostering a work environment based on respect for diversity and equity. Therefore, we establish guidelines that promote healthy interactions among all parties involved. Based on this premise, we declare the following as unacceptable within our institution:

- Any act of discrimination based on race, religion, nationality, ethnicity, gender, age, marital status, social class, political ideology, opinions, sexual orientation, health condition, disability, position, or title, or any other act that undermines human dignity and aims to nullify or diminish the rights and freedoms of individuals.
- Acts of abuse, sexual harassment, workplace harassment, verbal harassment, or physical harassment.
- Any form of harassment directed towards colleagues.
- Any type of workplace violence, including but not limited to physical or emotional/psychosocial violence.

## Equal Professional Opportunities

UNIFIN supports the talent of its employees by promoting their training and professional development. Our leaders encourage team members, ensuring equal opportunities based on clear criteria for measurement and achievement of objectives.

## Work Health and Safety

To achieve a safe working environment and promote physical, psychological, and emotional well-being, at UNIFIN, we promote and cultivate a work culture with the highest standards of safety and health. We adhere to guidelines on Civil Protection to prevent and minimize occupational hazards.

# Commitment to Our Organization

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## Care of UNIFIN Assets

The UNIFIN Community and Stakeholders protect and safeguard the company's assets, utilizing them efficiently, responsibly, and confidentially.

The UNIFIN Community promotes the proper use of email, internet, software, digital files, and any technological assets provided for the performance of their duties.

Information generated in UNIFIN is considered intellectual property for the exclusive use of the company. All information and documentation contained in assets or tools provided by UNIFIN are the exclusive property of UNIFIN. Therefore, UNIFIN may review and/or audit such information, directly or through any third party determined by UNIFIN at its sole and exclusive discretion, at any time, without the need for prior notice or authorization from the respective Collaborator.

All information, documentation, and communications generated and/or contained in such media may be used by UNIFIN for any investigation by the Ethics Committee and for any judicial investigation or proceeding of any kind, including criminal, administrative, civil, commercial, as well as any other purpose that the Ethics Committee deems appropriate.

## Care of the "UNIFIN" Image and Brand

As a registered trademark, no person may use logos, slogans, advertisements, advertising campaigns, related trademarks, images, or the name of UNIFIN for personal matters. Any use of UNIFIN's intellectual property must have the express written approval of the General Management.

### Q&A

**Q:** Can I download music, movies, or software on the computer provided by UNIFIN?

**A:** No, the computer equipment assigned to you by UNIFIN is for the performance of your duties. It is prohibited to download music, videos, or software without licensing or authorization from UNIFIN.



# Conflict of Interest

To prevent conflicts of interest related to transactions involving Related Parties and transactions of Relevant Amounts, the UNIFIN Community must comply with UNIFIN's Related Party Transactions Policies. **Directors, executives, and employees:**

1. Cannot participate in or influence decisions regarding the hiring of companies owned by direct relatives up to the second degree.
2. Cannot have interests and/or investments in companies that compete with UNIFIN, in which they may have significant influence.
3. If participating on the Boards of companies not affiliated with UNIFIN, they must inform the Ethics Committee, which will then notify the Board of Directors.

## **Additionally, executives and employees::**

1. **Cannot hire direct, collateral, or political relatives under their supervision, except in cases authorized by the Ethics Committee.**
2. **If assigned supervisory, control, or auditing tasks in areas of UNIFIN overseen by a relative, they must notify the area Director to be replaced from that responsibility.**

Members of the UNIFIN Community are prohibited from holding a concurrent position as a government official, politician, or political candidate..

To ensure compliance, each member must adhere to UNIFIN's Integrity Policy and conflict of interest guidelines, and sign either the "conflict of interest declaration" or a "declaration of absence of conflicts of interest," using the provided formats..

## **Q&A**

**Q:** Can I hire or influence the hiring of a service provider in which I and/or a second-degree relative have ownership participation?

**A:** No, because as you or your relatives are owners of the company, you gain a benefit that may supersede UNIFIN's interests.



## **Normative Compliance**

The he UNIFIN Community and Stakeholders are committed to complying with external and internal laws, regulations, and standards that provide guidance on achieving the company's objectives, within a framework of trust and institutionalization.

## **Hiring of Relatives**

The hiring of direct relatives up to the second degree by blood or marriage is prohibited, especially in positions under their supervision or in activities under their oversight, unless authorized by the Ethics Committee.





#### Q&A

**Q:** The process for authorizing a new company is currently ongoing with the authorities. Is it permissible for me to offer money or gifts to expedite their response?

**A:** No, offering money or gifts to government officials to obtain benefits that favor UNIFIN is considered bribery, a behavior not allowed in the company.

## Corruption, Extortion, and Bribery

At UNIFIN, behaviors of corruption, extortion, and bribery are deemed unacceptable and subject to severe penalties based on the circumstances of the harm and the corresponding criminal, administrative, civil, or labor responsibilities.

Members of the UNIFIN Community and Stakeholders are required to adhere to the Integrity Policy and its guidelines, as well as to this Code.

Accordingly, the following actions are prohibited:

- Demanding or accepting excessively large gifts, whether directly or indirectly.
- Offering personal benefits and/or compensations to public officials or employees of authorities (national or foreign) with the aim of obtaining or retaining business, benefits, and resolutions in favor of UNIFIN.
- Receiving unlawful payments or bribes from entities, individuals, or government authorities to secure a contract, concession, or approval for the benefit of oneself or UNIFIN.
- Invitations or any social acts targeting public officials (national or foreign) should never give rise to interpretations that question the ethics and integrity of UNIFIN.





## Professional Ethics

Individuals within the UNIFIN Community and Stakeholders are expected to:

- Maintain honest professional conduct in their activities within and outside UNIFIN facilities.
- Refrain from participating, on behalf of UNIFIN, in transactions linked or related in any way to personal, family, or illicitly obtained interests.
- Avoid influencing the approval of credit facilities or services in which they have such interests.
- Abstain from engaging in relationships with clients beyond those strictly associated with the products UNIFIN offers .



## Fraudulent Information

Fraudulent information is any data that has been altered or misrepresented in an attempt to distort the actual facts. Therefore, at UNIFIN, the following actions are prohibited:

- Distorting or falsifying UNIFIN information.
- Accepting altered or falsified documentation from clients, suppliers, and/or related individuals, as well as inputting such information into UNIFIN's computer systems with discrepancies in their data.
- Conducting in internal fictitious operations.
- All transactions must be accurately and clearly recorded in the accounting records, which will be accessible to the Board of Directors and both Internal and External Auditors.

### Q&A

**Q:** requested an advance for travel expenses and when providing the justification, I submitted invoices for expenses that I did not incur. Is this considered fraudulent information?

**A:** Yes, providing false information or altering records is considered fraudulent information.





## Freedom of Political Participation

At UNIFIN, we respect the political preferences of the UNIFIN Community without influencing or restricting their freedom to make decisions or participate in political acts or activities. This is allowed as long as such actions are undertaken independently and not on behalf of UNIFIN.

### Q&A

**Q:** If I attend an event organized by the political party of my preference and wear clothing that contains the UNIFIN logo, could this be considered a violation of the Code of Ethics?

**A:** Yes, the described behavior is punishable because by wearing clothing with the UNIFIN logo, it could be interpreted that UNIFIN supports that political party.



## Treatment of Confidential Information

Confidential information refers to data that, if disclosed, could provide competitors with advantages or negatively impact third parties, thereby causing harm to UNIFIN, its clients, and employees. Both the UNIFIN Community and Stakeholder Groups are committed to refraining from disclosing any information, which includes but is not limited to:

- Plans involving new partners and shareholders.
- Changes in UNIFIN's administration.
- Manuals, policies, authorities, and operational procedures.
- Client identities, along with the type and extent of business conducted with them.
- Any information found in documents marked as confidential and/or personal.
- Results of analyses in financial, accounting, anti-money laundering, counterterrorism, marketing, legal, or any other field, exclusively generated for UNIFIN's use.
- Notifications regarding individuals listed in anti-money laundering and counterterrorism financing databases.
- Information regarding clients, suppliers, collaborators, executives, directors, investors, and shareholders.
- Projects, computer and technological systems, and other initiatives developed or created within UNIFIN because of its professional activities or those of third parties.
- Organizational changes.
- Personal data concerning members of the UNIFIN Community.





The UNIFIN Community and Stakeholder Groups commit to safeguarding all types of information related to UNIFIN, while respecting professional secrecy.

Confidential information may only be provided in cases where there is an explicit, justified, and/or motivated request by authorities.

**It is prohibited to use UNIFIN's confidential information for personal purposes or for a third party; it may only be used exclusively for the performance of professional activities within UNIFIN.**

### Preguntas y Respuestas

**P:** As an executive of UNIFIN, I have access to the company's Strategic Plan.

Can I share this information with third parties?

**R:** No, company information is considered the property of UNIFIN, and disclosing it to a third party may provide advantages to our competitors.

UNIFIN's proprietary information can only be shared with authorities upon an explicit and justified request. In cases where information must be shared with a third party, a confidentiality agreement must be signed.







## **Anti-Money Laundering**

At UNIFIN, we are committed to complying with current regulations regarding Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT).

Directors, executives, and employees of UNIFIN must adhere to the Compliance Manual to prevent, detect, and report operations involving illicit funds and terrorist financing. This manual outlines the criteria, mechanisms, procedures, and policies related to this issue

## **Prohibition of Political Contributions**

The UNIFIN Community cannot and should not receive contributions or donations, whether in money or in kind, related to political and/or electoral activities for or towards UNIFIN.

UNIFIN neither promotes nor participates in political campaigns, nor provides donations, contributions, or political support, directly or indirectly, to any government, candidate, or political party.



## Social Media Policy

The UNIFIN Community must refrain from sharing, through personal social media profiles, any information pertaining to UNIFIN, its corporate or commercial matters, including advertising material, news, or announcements...

Marketing campaigns, promotional activities, products, and information related to UNIFIN are disseminated through the UNIFIN website, UNIFIN's official social media profiles, and authorized channels. Additionally, they must obtain corresponding authorization from General Management for dissemination.

The UNIFIN Community must take special care in managing personal social media accounts to avoid making false or erroneous statements, leaking information, or posting comments that could negatively impact UNIFIN's prestige and reputation among our Stakeholder Groups. To prevent misinformation, the UNIFIN Community must ensure that if they share any posts related to UNIFIN, they do so only from official UNIFIN Group profiles without adding any additional statements in their post.

Employees, executives, shareholders, or directors of any of the companies comprising UNIFIN must avoid referencing their positions, responsibilities, and institutional matters, ensuring that their opinions, recommendations, or statements remain solely personal in nature.

### Q&A

**Q:** I work in the commercial department and am an active user of various social media platforms where I have a large network of contacts. Am I allowed to use my accounts to promote UNIFIN's products?

**A:** No, the information you post on your social media accounts is on a personal basis, and information related to UNIFIN can only be published on the company's official accounts.



# Commitment to Stakeholder Groups

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## Customer Relations

Employees and executives of UNIFIN are dedicated to delivering quality services and excellence to clients, ensuring fair, honest, and respectful treatment.

No employee or official may accept, on a personal basis, fiduciary commitments, mandates, or powers from clients unless authorized in writing by the Director General of UNIFIN, except those resulting from the contractual relationship with UNIFIN for the provision of professional services.

The UNIFIN Community must avoid providing false information or making misleading comparisons about our services in relation to our competitors. Unfair competition is never endorsed, and operations with one client to benefit another are prohibited unless both parties are fully aware of their differing positions and expressly agree to the transaction. If applicable, clients should be informed of any economic or other ties that may imply conflicts of interest between them.







## **Supplier and Consultant Relations**

The UNIFIN Community, particularly those engaged in procurement decisions for supplies or services and in determining their economic terms, refrain from any interference that could compromise their impartiality or objectivity. They are prohibited from soliciting or accepting gifts or financial compensation in exchange for securing a contract.

Suppliers and consultants included in the portfolio are those with a reputable track record of fairness and integrity in their dealings, and who adhere to social and environmental responsibility standards.

The selection of suppliers and consultants is conducted impartially, based on criteria such as quality, profitability, and service.

Exclusive relationships are to be avoided.

## Investor Relations

The UNIFIN Community is dedicated to delivering sustained profitability to our investors, committed to providing advice with honesty and integrity, while safeguarding UNIFIN's interests.

## Competitor Relations

The UNIFIN Community, especially those involved in promoting products and services, is committed to conducting fair and honest competition.

No advisor, collaborator, or member of UNIFIN can defame competitors based on false or poorly substantiated information or create confusion among customers regarding the products and services of our competitors. It is prohibited for advisors to provide services to UNIFIN's competitors.







## **Insurance Carrier Relations**

The UNIFIN Community, especially those involved in dealings with insurers, is committed to providing honest and respectful treatment in every request, inquiry, or transaction.

## **Authorities and Regulatory Entities Relations**

UNIFIN conducts its business in compliance with all applicable laws and regulations. Therefore, the UNIFIN Community acts with respect and full cooperation with representatives of authorities within the scope of their competencies.

Information requests or execution orders are promptly recorded upon receipt, and the Director General must be informed to facilitate the appropriate procedure.

In accordance with UNIFIN's Integrity Policy and guidelines, UNIFIN employees and executives collaborate with competent authorities for the full exercise of their powers, provided there is a request from them, and act in accordance with the law to defend the legitimate interests of UNIFIN.



# Commitment to Society and the Environment

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## Donations

UNIFIN is committed to helping and supporting those who need it most. By virtue of creating new opportunities, UNIFIN has joined the solidarity efforts with our Society by actively participating with its volunteerism.

To make the receipt of donations transparent, UNIFIN adheres to compliance with the internal policies, laws and provisions in force to carry out said donations, investments or equivalent activities.

## Environment

As part of our commitment to social responsibility, we acknowledge the importance of protecting and conserving the environment. We prioritize efforts to promote a culture of environmental care and preservation, while adhering to relevant programs and regulations.


UNIFIN is dedicated to managing our environmental footprint and supporting initiatives that benefit the environment.





# Ethics Committee

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**When Powers are part of your daily actions, they manifest as a competitive advantage.**



# Ethics Committee

UNIFIN has instituted the Ethics Committee to ensure thorough compliance with and oversight of the provisions outlined in this code. Its primary functions and responsibilities include:

**Implement standards of conduct and ethics.**

**Addressing, monitoring, and resolving all complaints received related to the Code of Ethics**

**Reviewing and, if necessary, updating the Code of Ethics.**

**Promote dissemination and training plans together with designated people from the Human Resources and Compliance areas.**

**Establishing and imposing sanctions for non-compliance with the provisions of this Code of Ethics.**

**Promoting a corporate culture based on ethical principles**

The Ethics Committee consists of executives with extensive professional experience and proven moral integrity, who will maintain complete discretion regarding all cases received and addressed.

The email address [transparencia@unifin.com.mx](mailto:transparencia@unifin.com.mx) has been established as a means of communication with the Ethics Committee to address any questions and suggestions regarding the provisions of our code.



# Corporate Governance

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## Corporate Governance

To support the trust of our investors, at UNIFIN, we have adopted the best administrative and corporate governance practices to achieve effective communication among the Board of Directors, Committees, Management, Shareholders, and Stakeholder Groups. This commitment translates into operations characterized by accountability, equality, and transparency. As a public company, UNIFIN establishes and adheres to the following guidelines:

- We safeguard the rights of all our shareholders.
- Our Audit and Corporate Practices Committee is composed exclusively of independent members to ensure their objectivity and impartiality.
- Other corporate governance bodies have varying degrees of independent oversight.

### **DID YOU KNOW...**

**As a public company, UNIFIN is committed to adopting best practices in Corporate Governance?**

Yes, every year, in the information reported to the Mexican Stock Exchange, adherence to the best practices of Corporate Governance is disclosed. This identifies us as a company that ensures accountability, equity, and transparency in our relationship with all stakeholders.



# Responsibilities

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## **Board Members**

- Sign the "Adherence Letter" to the Integrity Policy and its guidelines.

## **Ethics Committee**

- Approve the Code of Ethics and its adjustments.
- Supervise compliance with the provisions of the Code of Ethics, Integrity Policy, and other related policies.
- Define appropriate sanctions in case of violations of the Code of Ethics guidelines.
- Establish a communication program to disseminate and ensure compliance with policies and the consequences of non-compliance.
- Verify, together with the Audit Committee, the proper functioning of the reporting system.
- Ensure that training and reinforcement plans on business ethics matters are carried out..

## **Managers and Employees**

- Sign the "Adherence Letter" to the Integrity Policy and its guidelines.
- Understand and comply with the Code of Ethics, Integrity Policy, its guidelines, and other related policies.
- Promote the Code of Ethics and its compliance.



## Vice Presidency of Talent and Culture

- Disseminate the Code of Ethics to ensure a thorough understanding of the established principles and Powers.
- Ensure that Advisors and Directors sign the "Adherence Letter to the Integrity Policy."
- Include topics from the Code of Ethics, Integrity Policy, and its guidelines in the induction program.
- Communicate any changes made to the Code of Ethics.
- Publicize the Reporting System procedure

## Vice Presidency of Government, Risks and Control

- Develop and design modifications to the Code of Ethics to ensure they are updated according to the organizational culture of the Institution.
- Monitor corrective actions or the application of sanctions established by the Ethics Committee regarding the resolution of reports.
- Review and/or update the Code of Ethics, Integrity Policy, and its guidelines.







# Complaint Channels and Sanctions

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## Complaint Channels

Should any employee, official, supplier, or customer become aware of illicit activities or indications of non-compliance with this code, it is imperative to report it promptly through our anonymous reporting channels, which have been diligently implemented for this purpose:

Al correo electrónico:

[transparencia@unifin.com.mx](mailto:transparencia@unifin.com.mx)

Página web:

[Soluciones financieras | UNIFIN Poder Para tu Negocio](#)





## **Complaint Channels**

- These communication channels are designed to foster honesty, integrity, and commitment among UNIFIN employees and executives, enabling the UNIFIN Community and Stakeholder Groups to report any situation that may violate this Code.
- Reports will be managed by an external firm with extensive experience in providing professional services of this nature, ensuring an objective, secure, impartial, and confidential reporting process.
- Reports will be addressed 24 hours a day, 365 days a year.
- Total confidentiality of the reporter is guaranteed. Individuals providing information or cooperating with any investigation where non-compliance with the provisions established in this code or any corporate policy is suspected cannot be dismissed, suspended, or demoted for this reason unless the information they provide is malicious or their actions are intended to harm an innocent party.

## **Sanctions**

- The Ethics Committee evaluates the offense committed to determine the type of sanction, always adhering to the current Internal Work Regulations and the Disciplinary Guidelines for Non-Compliance with the Integrity Policy and its guidelines.
- Sanctions can range from an administrative warning to the termination of the employment contract, regardless of whether the case may be referred to the relevant authorities. UNIFIN will establish mechanisms of collaboration and cooperation with these authorities, in accordance with UNIFIN's Integrity Guidelines and Integrity Policy.



# Definitions

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# Definitions

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**Below are some behaviors and situations that may be reported through the established channels in this document. Cases not listed below and reported will be analyzed by the Ethics Committee:**

**Misuse of trust:** Occurs when an individual or group misuses the trust granted by the company by utilizing certain privileges or decision-making power for personal, professional, or economic gain without authorization, resulting in financial harm or damage.

**Sexual harassment:** Defined as any verbal or physical behavior of a sexual nature aimed at violating a person's sexual freedom, creating an intimidating, hostile, degrading, humiliating, or offensive environment within the work or service relationship.

**Unethical benefits or dealings with suppliers and contractors:** Involves any negotiation between a UNIFIN advisor, executive, or employee and a supplier, including the acceptance of any benefit from any party through an agreement or arrangement. Similarly, when a supplier reports inadequate attention regarding the service they provide to the company.

**Unfair competition:** Encompasses practices aimed at gaining advantages in the market, such as false or misleading advertising, exclusive establishment of sales contracts with distributors, or the adoption of any other means that unfairly and in bad faith take advantage of a competitor's situation.

**Unsafe security conditions:** Refers to the lack or poor condition of both work equipment and facilities (e.g., connections, machinery, fire extinguishers). Also includes workplace conditions or omissions that endanger the physical integrity of employees.

**Conflict of interest:** Arises when someone's judgment and objectivity tend to be influenced by a secondary interest, generally of an economic or personal nature. Specifically, it occurs when personal benefit is prioritized over that of UNIFIN in the performance of duties within the institution.

**Discrimination:** Any act that directly or indirectly involves distinction, exclusion, or restriction against a person based on race, color, gender, ethnic origin, age, disability, religious beliefs, sexual orientation, or any other condition, aimed at limiting the recognition or exercise of their freedom and human rights, thereby altering equality of opportunities or treatment.

**Disclosure of personal data of clients, suppliers, and collaborators:** Providing third parties with non-public personal information of clients, suppliers, or collaborators without express authorization to do so, or due to ignorance of applicable legislation.

**Violations of social commitments:** Harm caused to society or a part thereof resulting from actions or omissions of an individual or group, which may negatively impact UNIFIN's reputation or image.

# Definitions

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**Fraud:** Any illegal act characterized by deception, concealment of information, or misuse of powers committed by one or more persons, taking advantage of detected control weaknesses and benefiting from obtaining some economic benefit.

**Harassment of collaborators:** When a person or group engages in behaviors characterized by verbal or physical violence systematically in the workplace, causing psychological harm to another person or group.

**Non-compliance with laws or regulations:** When a particular action or behavior violates any regulation issued by the authorities, it may involve local, state, or federal laws, as well as internal policies.

**Accounting irregularities:** Any distortion or omission in a company's accounting documents, such as accounting records, financial reports, books, and social records, and/or information generated by the accounting system.

**Misuse of confidential information:** Refers to the disclosure of UNIFIN's confidential information, whether intentional, by mistake, or through negligence.

**Manipulation or falsification of company records:** Unauthorized alteration or reproduction of company documents such as attendance records, productivity records, reports, travel expense alterations, etc.

**Work negligence:** Refers to the carelessness, lack of effort, or application demonstrated by an employee in carrying out the responsibilities of their position.

**Retaliation against complaints:** Any repressive or vengeful act against a complainant or person associated with them as a result of a complaint made.

**Theft:** Appropriation or extraction of UNIFIN's property without express authorization and with the intention of taking possession of it.

**Bribery:** Any act involving a natural or legal person accepting or soliciting a bribe in exchange for performing or not performing a certain act. This includes promising, offering, requesting, giving, or receiving anything of value or benefit that may influence decisions during the bidding process or execution of a contract.

**Misuse of assets:** Using UNIFIN's assets for a purpose other than that for which they were acquired or for personal benefit; likewise, when established policies for their use are not followed.

**Workplace violence:** Behaviors ranging from physical abuse to psychological abuse among employees, which can occur at the same or different hierarchical levels.





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