

# CODE OF ETHICS FEMSA



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# INTRODUCTION

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- MESSAGE FROM OUR CHAIRMAN
  - PURPOSE
  - SCOPE
- 



# MESSAGE FROM OUR CHAIRMAN

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At FEMSA we know we must put our cultivated values into practice to achieve our mission of generating economic and social value. Acting with respect, honesty and integrity, and being governed by the laws and regulations of the countries in which we operate is an essential part of our corporate culture.

The Code of Ethics FEMSA is the basis of our corporate behavior and the foundation of our policies, procedures and guidelines. It has been approved by the Board of Directors, which has also authorized its issuance and continuous updating, which is necessary due to changes observed in the business environment.

Updating this code allows us to strengthen trust in our directors, employees, investors, customers, suppliers, authorities and communities. The FEMSA Code of Ethics formalizes in a single document our ethical principles, unifies criteria and establishes a common frame of reference that guides us to always act in a comprehensive manner.

It is a useful work tool that helps us make the right decisions in accordance with our values. I invite everyone who is part of the FEMSA family to read and continuously consult our FEMSA Code of Ethics. It is also very important to report any irregularities observed.

I know I can count on your support, enthusiasm and commitment to continue creating success stories and strengthening FEMSA's reputation.



With kind regards,

**José Antonio Fernández Carbajal**

Executive Chairman of the Board of Directors of FEMSA

# PURPOSE

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1. Establishing the fundamental principles and standards that are guidelines for our ethical behavior in our relations with our shareholders, customers, suppliers, authorities, civil organizations, environment, community and everyone who interacts with FEMSA.
2. Define the responsibilities of the company's directors and employees in order to comply with and enforce the a FEMSA Code of Ethics which, together with the Corporate Policies, form part of our corporate governance system.
3. Divulge the FEMSA Ethics Line, through which any behavior, breach or practice that does not comply with the provisions of the FEMSA Code of Ethics or Corporate Policies can be reported.

# SCOPE

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1. Our FEMSA Code of Ethics applies to members of the Board of Directors, employees and all persons acting on behalf of FEMSA and its subsidiaries.
2. The FEMSA Code of Ethics is not intended to be exhaustive. Therefore, unforeseen situations will be resolved in accordance with criteria of best management and corporate governance practices.
3. Additional matters arising from diverse situations of our business and the dynamics of the environment will be incorporated as necessary.

# OUR CULTURE

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- 
- OUR MISSION AND VISION
  - OUR VALUES
- 



# OUR MISSION AND VISION

*We have established a Mission, Vision and values that lead our path and set the guidelines for planning strategies and projects aimed for success to attract and satisfy consumer demand, consistently generate economic value and greater social development for our shareholders.*

## MISSION

Generate social and economic value through companies and institutions.

**We generate economic value** through designing, building and scaling mass business models, which enable us to meet our customers' daily needs in a distinguished and efficient manner.

**We generate social value** contributing to the improvement of the communities we serve through our actions, the comprehensive development of our employees, and with value proposals that generate well-being.

## VISION

Our focus towards accomplish our mission can only be compared with our passion to achieve our strategic goals:

- Be the best owner, partner and operator of our businesses in the long term.
- Aspire to double the value of our business every 5 years.
- Be leaders in the markets where we operate.
- Be the best employer and neighbor to the communities in which we operate.



# OUR VALUES

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*We live up our commitment with a sense of belonging and responsibility in our actions and through our values, which are relevant part of the organization and provide the foundation for the development of standards on which our decisions and actions are based.*

A FEMSA employee generates a great impact, always seeks to transcend, places the greater good of the organization above his or her own professional goals, and excels for his or her:

- **Integrity and Respect:** Is honest in his or her behavior and maintains a respectful and dignified treatment with all the people.
- **Sense of Responsibility:** Is committed. Measures, acknowledge and takes responsibility of his or her actions.
- **Humbleness and Service Attitude:** Perceives that everyone is valuable and important, is always willing to collaborate and serve for the organization's benefit.
- **Passion for Learning:** Is in constant pursuit of learning and new challenges that allows him or her to develop continuously in a dynamic environment.

The way our employees work, reinforces / develops FEMSA's distinctive capabilities and enables our strategy.

- **Customer Focus:** Is always in the search of improve our value proposition and the experience of our customers.
- **Commitment to Excellence:** Is focused on continuous improvements to reach excellence and create value.
- **Innovation-Oriented:** Constantly questions the *status quo* to positively transform our business model.
- **Collaborative Aptitude and Willingness:** Develops the best working teams and generates coordinated efforts through systemic thinking to enable our customers.

# OUR PEOPLE

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- 
- **HUMAN RIGHTS**
    - o Respect for human dignity
  - o Diversity and inclusion
  - **FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK**
    - o Safety and health at work
- 



# HUMAN RIGHTS

*At FEMSA, we acknowledge that Human Rights are the set of principles based on human dignity, which are essential to the holistic development of the person.*

## Respect for human dignity

1. We display loyal, respectful, diligent and honest behavior.
2. We respect the dignity of people, their freedom and their privacy.
3. We do not allow verbal, visual or physical behavior that threatens dignity and respect.
4. We are committed to promoting and maintaining a work environment in which all kinds of harassment, violence and bullying or any other threatening activity against the dignity and respect of our employees is prohibited and reported.

## Diversity and inclusion

5. We promote diversity and inclusion, seeking to attract talent that is diverse and giving them the same rights and obligations, based on their position.
6. We do not discriminate against anyone for any reason, including origin, race, marital status, age, opinions, gender, creed, tribe, association or affiliation to a union, ethnicity, social or economic class, pregnancy, sexual identity, disability or nationality.

# FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

*At FEMSA, we are committed to growth as a high-performing organization where talent, culture and leadership are the main drivers of our people's development and for the fulfillment of our strategic objectives. Therefore, we seek to promote the professional development of our employees and provide them with the necessary training and resources to foster their safety and success at work.*

1. We value, respect and protect the people who work at FEMSA.
2. We do not allow forced labor and we comply with the applicable laws regarding the hiring of minors.
3. We report cases in which we can not fulfill our responsibilities objectively due to third party pressure who use their position, authority or influence at FEMSA.



## Safety and health at work

4. We believe that the physical integrity, safety and health of our employees in the workplace are as important as any other function and objective of FEMSA.
5. We take the necessary actions to ensure that the following occupational safety and health objectives are met:
  - a) Provide and maintain safe and healthy workplaces.
  - b) Provide and maintain a suitable work environment.
  - c) Develop a safety culture among the employees.



# OUR PLANET

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- 
- COMMITMENT TO OUR COMMUNITY
  - ENVIRONMENT
- 



# COMMITMENT TO OUR COMMUNITY

*We acknowledge our commitment to contribute to the development of communities through our business management, which is a display of the principles and values that we have practiced since our beginning.*

1. We establish strategic alliances with civil organizations and other entities that aim to boost the social impact of our community actions.
2. We exercise an active citizenship by participating in community and public affairs, which allows us to have an impact on the human and economic development of the communities in which we operate.





# ENVIRONMENT



*We understand, deal with and mitigate the risks associated to the environmental impact caused by the use of energy and water and waste management throughout the value chain of all our operations.*

1. We acknowledge as part of our social commitment the protection and conservation of the environment.
2. In our operations, we encourage the development and diffusion of environmentally friendly technologies.



3. At FEMSA, we take the necessary actions to ensure:
  - a) That effective procedures in response to potential emergencies are placed to minimize the impact of unpredictable incidents.



- b) Significant changes in operating units and processes are evaluated in advance, to prevent adverse impacts on the environment.
- c) The generation of waste, drainage discharges and air emissions are reduced to ensure they do not cause an adverse environmental impact.
- d) Promote the use of clean energy sources, make efficient use of energy and monitor consumption.
- e) The necessary measures are taken to prevent environmental accidents which could be caused by our operations.
- f) Promote the efficient use of water, as well as activities that encourage its care and conservation.
- g) Promote a culture of reforestation and urban forestry.
- h) Promote recycling and reuse of waste from our operations, as well as waste related to our products and services.



# OUR RESOURCES

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- 
- FEMSA USE OF ASSETS
  - INFORMATION MANAGEMENT
    - Privileged and confidential information
    - Accounting and financial records
    - Intellectual property
    - Personal data
    - Information technology security
- 



# FEMSA USE OF ASSETS

*We have the responsibility to protect and properly use FEMSA's assets, as well as to seek the best use of assigned resources.*

1. We protect and preserve FEMSA's assets and those that we use on behalf of FEMSA.
2. We use FEMSA's assets efficiently to contribute to the achievement of its objectives.
3. We use FEMSA's name and resources responsibly, always looking out for the sole benefit of the company.



# INFORMATION MANAGEMENT

*Through the systems authorized by the administration, we generate, obtain, treat, protect and preserve information as a company asset responsibly, ethically, and in accordance with the applicable laws in each country where we operate.*

## Privileged and confidential information

1. In compliance with the laws that regulate the securities markets where FEMSA is listed, we do not disclose, and avoid the leakage of, privileged and confidential information to unauthorized persons.
2. We do not carry out transactions for our own benefit or that of third parties with any kind of securities issued by FEMSA, whose price could be influenced by the privileged information that we possess.
3. Those who perform activities as lecturers, exhibitors or students only use FEMSA's public information to perform their activities.
4. We do not make any comments, including in family and friend environments or on social networks, about activities that we carry out at FEMSA which could be harmful to the company or to those who form part of it.
5. FEMSA's official spokespersons are the only people authorized to give information about the company to the media.





## Accounting and financial records

6. We record accounting and financial information in a comprehensive, proper and timely manner, in accordance with current accounting regulations and as established by applicable laws and securities regulators, ensuring the truthfulness of the indicators we are responsible for.

## Intellectual property

7. We do not disclose any type of confidential information, including that related to trade secrets, processes, methods, strategies, plans, projects, technical or market data or any other type of information. We maintain the confidentiality of such information even when our working relationship with FEMSA has concluded, and we do as well with the confidential information of the companies with whom we have previously worked.

## Personal data

8. We obtain and process personal data responsibly, ethically and in accordance with applicable laws in each country where we operate.

## Information technology security

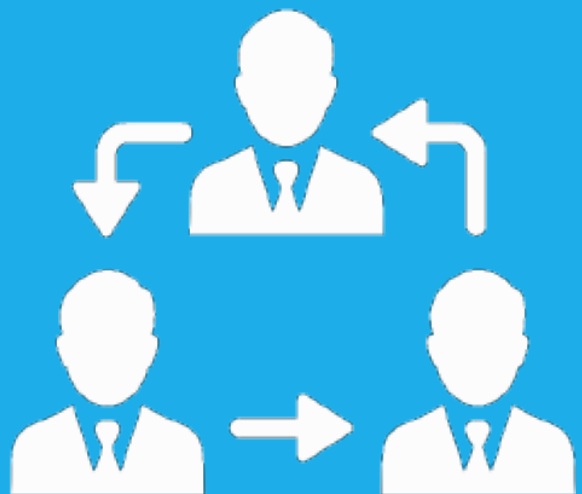
9. We are aware of the responsibility shared by all in the protection and preservation of the security of the information that is administered through FEMSA's technological resources.
10. We responsibly use and protect access to accounts and passwords assigned to technological resources.



# OUR RELATION WITH THIRD PARTIES

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- 
- CLIENTS
  - SUPPLIERS
  - COMPETITION
  - GOVERNMENT AND AUTHORITIES
  - MARKETING
- 



# CLIENTS

*At FEMSA, we seek to improve the value proposition and experience of our clients.*

1. We serve our clients by providing them with fair and honest treatment in each transaction, adhering to the FEMSA principles and values, providing products and services with the highest quality and punctuality.
2. We do not make false comparisons with equivalent products or services offered by competitors.
3. We understand the needs of our customers and we are committed to innovate our processes and products to satisfy them.



# SUPPLIERS

*We contribute to the improvement of the labor, social and environmental performance of our suppliers and we look for those who work based on policies, principles and responsible business practices.*

1. Our portfolio of suppliers only includes those who share our ethics and values.
2. Those of us who negotiate the acquisition of the goods and services that FEMSA requires, offer and demand professional treatment from our suppliers in each transaction, always seeking the best interests of the company.
3. We ensure the equal participation of suppliers based on the criteria of quality, profitability and service.
4. We consider as a illicit conduct to request or receive any kind of incentive from suppliers for their selection, which does not benefit the company.





# COMPETITION

*We do business fairly, based on our ethical principles and in compliance with fair competition laws in the countries in which we operate.*

1. We do not participate in any agreement with customers, suppliers or competitors that seeks to limit the market forces in the places where we operate.
2. Those of us who are in contact with competitor representatives display a professional attitude, following the principles and values of the company we represent, protecting our personal image and that of FEMSA.
3. When interacting with competitors, either individually or in forums and business or professional associations, we do not comment on issues that could create risk or potential liabilities for FEMSA in terms of compliance with competition laws.



# GOVERNMENT AND AUTHORITIES

*At FEMSA, our values are the basis of our relationships with the government and the authorities of the countries where we operate, and we provide them with an open and respectful treatment.*

1. We comply with the laws, regulations and other applicable guidelines established by the governments of the countries in which we operate.
2. We collaborate at all times with government and competent authorities so that they can fully exercise their powers, and we act in accordance with the law in defense of the legitimate interests of FEMSA.
3. We respect the government and authorities, to whom we offer polite treatment, and we seek an atmosphere of openness and trust that facilitates the discussion of issues and the establishment of agreements.
4. We attend to the requirements and observations of governments and authorities, seeking to collaborate effectively and politely in the fulfillment of their mission, within the powers granted by laws or regulations.
5. The relationships between FEMSA and government agencies or officials are conducted in compliance with applicable laws and this FEMSA Code of Ethics.
6. Prior to having contact with the government and/or authorities on behalf of FEMSA, we verify, with the Institutional Relations areas of our Business Unit, that said interaction is within our powers.

# MARKETING

Communication through FEMSA's advertising and marketing is:

1. Legal, decent, honest, truthful and in accordance with principles of fair competition and good business practices.
2. Prepared with a sense of social responsibility and based on principles of honesty and good faith.
3. Verifiable and free of elements that could lead to a misinterpretation of the characteristics of the products and services offered.
4. Respectful of moral values, avoiding unethical circumstances that violate integrity and human dignity or use culturally offensive symbols.



# CULTUR OF LAWFULNESS

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- 
- COMPLIANCE WITH THE REGULATORY FRAMEWORK
  - ANTI-CORRUPTION
    - Anti-bribery
  - ANTI-MONEY LAUNDERING
  - POLITICAL CONTRIBUTIONS
  - CONFLICTS OF INTEREST
    - Financial interests
    - Family and others
    - Gifts, travel and attention
    - Other activities
- 



# COMPLIANCE WITH THE REGULATORY FRAMEWORK

*At FEMSA, lawfulness is part of our culture and we work to ensure our employees practice this notion. We firmly believe that our world requires organizations and individuals committed to our society.*

1. We comply with the laws, regulations and codes of the countries in which we operate, as well as with this FEMSA Code of Ethics, and the policies, rules and procedures established by the FEMSA Administration.



# ANTI-CORRUPTION

*We conduct business practices in accordance with the law, in an honest and ethical manner, with zero tolerance for bribery, rejecting and fighting any act of corruption.*

1. In our activities inside and outside FEMSA or on behalf of it, either directly or through a third party, we do not participate in acts of corruption, therefore;

- we do not order, authorize or promise to carry out corrupt practices,
- we do not induce any person to carry out corrupt practices, and
- we do not conspire to conduct said behavior.

2. We comply with the anti-corruption laws in the countries in which we operate.

## Anti-bribery

3. We reject any kind of bribe to government officials.





# ANTI-MONEY LAUNDERING

1. We comply with the applicable laws on the prevention of money laundering, and we promote its knowledge and compliance among our employees.
2. We develop processes and mechanisms to comply with the prevention of money laundering applicable laws, which contribute building security and confidence in the sectors of the economy and in the countries in which we operate.

# POLITICAL CONTRIBUTIONS

1. Those of us who participate in political activities, in any jurisdiction, do not involve FEMSA, and we clearly establish that we act in a personal capacity and not on behalf of the company.
2. We comply with the requirements established by local laws regarding political contributions in the countries in which we operate.



# CONFLICTS OF INTEREST

*At FEMSA, we carry out all our activities with integrity and professional ethics, always seeking FEMSA's benefits and not personals.*

## Financial interests

1. Companies that intend to buy, sell or provide services to FEMSA, in which we have direct and indirect financial interests, can only carry out these operations once they have been analyzed and approved according to the internal regulations established by FEMSA.
2. We have no interests or investments that allow us to have an influence on competing businesses.
4. We avoid having family members reporting to us, except in cases authorized in writing by the Corporate Practices Committee of the Board of Directors.
5. Those of us who perform monitoring, supervision, auditing or control over an area under the responsibility of a relative, must report this situation to a superior so that this duty can be replaced.
6. We do not intervene or satisfy the requirements of superiors, subordinates, co-workers, family or friends, if it may harm FEMSA.

## Family and others

3. We do not participate or directly or indirectly influence the requests, negotiations and decision processes with customers or suppliers with whom we have a family relationship, or any other interest different to those of FEMSA, for which we can obtain personal benefits.





### Gifts, travels and attentions

7. We do not receive, give, pay, offer, promise, or authorize, on behalf of FEMSA or on a personal basis, in a direct or indirect way, money, gifts, advantageous conditions, salaries, travel, commissions or any other form of compensation to influence a business decision or to obtain any undue advantage or benefit of any kind.
8. We only accept, give or offer gifts and hospitality of a nature that is promotional, occasional or of symbolic value.
9. When a client or a supplier offers an invitation, which implies a trip outside the city or to attend a sporting event or any other entertainment, we must obtain prior approval from the senior management level and the corresponding Ethics Committee in order to evaluate the commercial justification for said attendance.

### Other activities

10. We do not carry out any external activity that could affect our capacity and availability towards our obligations with FEMSA.

# OUR RESPONSIBILITIES

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- 
- BOARD OF DIRECTORS
  - DIRECTORS
  - AUDIT AND CORPORATE PRACTICES COMMITTEES
  - SECRETARY OF THE BOARD
  - FEMSA REGULATIONS AND CORPORATE GOVERNANCE
  - ETHICS COMMITTEES
  - GENERAL DIRECTORS OF THE BUSINESS DIVISIONS
  - EMPLOYEES
  - HUMAN RESOURCES
  - INTERNAL AUDITING
- 



# BOARD OF DIRECTORS

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1. Approve the content and adjustments to the FEMSA Code of Ethics, as well as its issuance.
2. Ensure, in coordination with General Management, the diffusion of the FEMSA Code of Ethics.

# DIRECTORS

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1. Know the FEMSA Code of Ethics and annually sign the Commitment Letter to comply with its provisions.
2. Inform the Chairman of the Board of Directors of any part of this FEMSA Code of Ethics which considers that its interpretation or applicability is not clear enough, in order to find a proper solution.
3. Report any possible violation of the FEMSA Code of Ethics.



## AUDIT COMMITTEE AND CORPORATE PRACTICES COMMITTEE



1. Supervise the compliance with the FEMSA Code of Ethics.
2. Submit proposals to modify the FEMSA Code of Ethics for approval of the Board of Directors.

## SECRETARY OF THE BOARD



1. Disseminate the FEMSA Code of Ethics among the members of the Board of Directors.
2. Ensure that the members of the Board of Directors annually sign the Commitment Letter to comply with the FEMSA Code of Ethics.
3. Disseminate the Compendium of Regulations, Guidelines and Policies of the Board of Directors, among its members.

# FEMSA REGULATIONS AND CORPORATE GOVERNANCE



1. Monitor diverse business situations, as well as the dynamics of the environment and the requirements of the Business Units to propose, and, where appropriate, modify the content of the FEMSA Code of Ethics and Corporate Policies.
2. Ensure that all directors and managers annually sign the Commitment Letter to comply with the FEMSA Code of Ethics and Corporate Policies.
3. Address doubts regarding the interpretation and content of the FEMSA Code of Ethics and Corporate Policies.
4. Monitor the compliance with the FEMSA Code of Ethics and Corporate Policies.

# ETHICS COMMITTEES



1. Ensure that the Business Units comply with the FEMSA Code of Ethics to promote the FEMSA Culture.
2. Ensure dissemination, understanding and use of the FEMSA Code of Ethics and the FEMSA Ethics Line.
3. Provide guidance for reports received through FEMSA Ethics Line and respond to any doubts and concerns related to possible violations of the FEMSA Code of Ethics and Corporate Policies.

# GENERAL DIRECTORS OF THE BUSINESS DIVISIONS



1. Disseminate the FEMSA Code of Ethics and Corporate Policies among employees.
2. Ensure that the business divisions comply with the rules established in the FEMSA Code of Ethics and Corporate Policies.

# EMPLOYEES

1. Know and comply with the FEMSA Code of Ethics and Corporate Policies.
2. Report any possible violation of the FEMSA Code of Ethics and Corporate Policies.
3. Know and use the FEMSA Ethics Line, if necessary.
4. Sign in accordance with the periodicity indicated by the company, the Commitment Letter to comply with the FEMSA Code of Ethics and Corporate Policies.





## HUMAN RESOURCES



1. Disseminate the FEMSA Code of Ethics and Corporate Policies among employees through the delivery of copies, collecting signed acknowledgments of receipt.
2. Include the topics contained in the FEMSA Code of Ethics and Corporate Policies in induction and training programs.
3. Disseminate among employees the procedure for the FEMSA Ethics Line.

## INTERNAL AUDIT



1. Evaluate the compliance with the provisions contained in the FEMSA Code of Ethics.
2. Inform to the Audit and Corporate Practices Committees of the Board of Directors of any breach of the FEMSA Code of Ethics.
3. Follow up on the measures adopted by the management for violations reported through the FEMSA Ethics Line.

# ETHICAL COMPLIANCE SYSTEM

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- 
- REPORTS
  - FEMSA ETHICS LINE
  - QUESTIONS AND CONCERNS
  - CORRECTIVE MEASURES
- 



# REPORTS

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*At FEMSA, our values are an essential and indispensable part of our life and culture. Therefore, we take any report about illegal practices or inappropriate behaviors detected in our company seriously.*

1. We keep all reports received by FEMSA executives from their employees and third parties, or those collected through the FEMSA Ethics Line or through any other means completely confidential.
2. We do not tolerate reports that are unfounded and made in bad faith against an innocent person.
3. We do not take any kind of reprisal against people who report and/or cooperate in good faith in investigations that presume the breach of any provision established in the FEMSA Code of Ethics or the Corporate Policies.
4. Failure to report any known violation of the FEMSA Code of Ethics and/or the Corporate Policies, implies being jointly responsible and deserving of a corrective measure.
5. We attend all reports received and we document them in the FEMSA Ethics Line.

# FEMSA ETHICS LINE

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*We promote and facilitate the detection of illegal practices and inappropriate behaviors through open communication and formal mechanisms implemented in accordance with the provisions established in the FEMSA Code of Ethics, and we provide timely information about any violations.*

1. The FEMSA Ethics Line is a formal mechanism used by directors and employees, as well as by third parties with which FEMSA has some relationship in the development of its operations, for reporting any breach of the FEMSA Code of Ethics and Corporate Policies.
2. The FEMSA Ethics Line is available 24 hours a day, every day of the year and is managed confidentially by a specialized company outside of FEMSA.
3. The FEMSA Ethics Line is supervised by the Audit Committee of the FEMSA Board of Directors, composed of independent directors.
4. In addition, we have an open communication to be able to report any concern regarding compliance with the FEMSA Code of Ethics and Corporate Policies to the immediate manager.

We have the following means to facilitate the reception of reports:

**Internet:** <http://www.femsaethics.com>

**E-mail:** [femsaethics@femsaethics.com](mailto:femsaethics@femsaethics.com)

**Telephone:**

ARGENTINA	0 800 122 0596
BRAZIL	0 800 891 7686 0 800 892 3425
CHILE	0 800 835 491
COLOMBIA	01 800 952 0815
COSTA RICA	0 800 052 1330
USA	1 855 246 6642
GUATEMALA	01 800 835 0468 +502 2375 3945
MEXICO	800 500 1271 800 500 1272 800 500 1274 800 500 1276 800 500 1278
NICARAGUA	+52 55 6266 7198
PANAMA	0 800 052 1253 +507 83 65 888
PERU	0 800 78424
URUGUAY	000 416 205 6395
VENEZUELA	01 800 100 5376 Caracas +58 212 72 02 560

# QUESTIONS AND CONCERNS



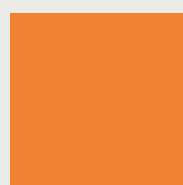
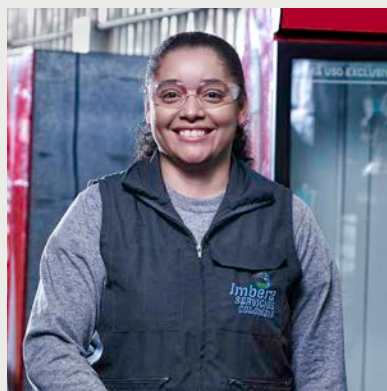
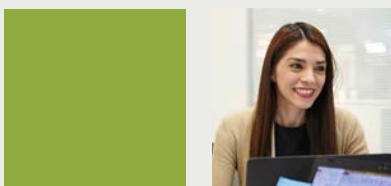
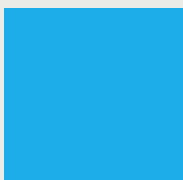
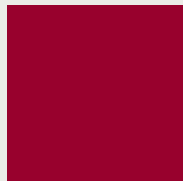
We promote a culture of prevention, so we receive questions and concerns regarding compliance with our FEMSA Code of Ethics and Corporate Policies through the FEMSA Ethics Line.

# CORRECTIVE MEASURES



1. Breaches of the FEMSA Code of Ethics and Corporate Policies will be subject to corrective measures.
2. The severity of the corrective measures will depend on the severity of the faults committed.
3. Corrective measures range from written reprimands and dismissals to criminal prosecution before the competent authorities.
4. We consider the failure to apply corrective measures to violations to itself be a violation.
5. We respect the rights of the people involved in the reports received and validate and document all available evidence before taking any corrective action.





# CODE OF ETHICS FEMSA



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