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GENOMMA LAB  
ANTI-CORRUPTION  
POLICY

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**Genomma Lab**<sup>®</sup>  
*Internacional*

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# 1

# OBJECTIVE

- 1.1 Establish guidelines to prevent and/or avoid any corruption practice and influence peddling exercised by employees and /or third parties in connection with Genomma Lab, in order to protect the image and reputation of the Company.

# 2 SCOPE

- 2.1 This policy is directed to all employees of Genomma Lab Internacional S.A.B. de C.V. and its subsidiaries and/or affiliates.

# 3

# DEFINITIONS

- 3.1. **Acts of Corruption:** Any act whereby a person, directly or through an intermediary, promises, offers or gives an incentive with economic value to any third party, to get them to perform or refrain from performing an act, in order to obtain or retain a benefit or unfair advantage, regardless of the acceptance or reception of the incentive or the result.
- 3.2. **Code of conduct:** Guidelines of ethical behavior that promote our organizational values and our corporate social responsibility. It describes the conduct to be observed by all partners, without exception, towards our colleagues, clients, consumers, suppliers, shareholders, authorities and the environment.
- 3.3. **Associates:** All the employees of Television Products Retail, S.A. de C.V. and/or its subsidiaries.
- 3.4. **Ethics Committee:** The body that ensures and monitors the correct implementation of the *Anti-Corruption Policy*.
- 3.5. **Genomma Lab:** Genomma Lab Internacional, S.A.B. de C.V.
- 3.6. **Group:** Genomma Lab and its subsidiaries.
- 3.7. **Subsidiaries:** Legal entity, domestic or foreign, in which Genomma Lab has direct or indirect control of the assets and/or operations.
- 3.8. **Third parties:** Any individual or legal entity that has a commercial and/or contractual relationship, for services, or any kind, with the group.
- 3.9. **Influence Peddling:** Any act arising from of the use of personal, commercial, or institutional relations, economic or political power, being real or fictitious, with the goal that a third party performs or refrain from performing an act in order to obtain or retain a benefit or unfair advantage.

# 4

# OPERATING POLICY

4.1 All the associates should act in accordance with the guidelines and ethical principles defined in the *Code of Conduct*.

## 4.2 **Acts of Corruption**

4.2.1. It is forbidden to any associate and third parties, to perform an Act of Corruption.

4.2.2. In the case that an associate is a victim or has knowledge of an Act of Corruption, must not do so, and must notify the Ethics Committee to determine the way the group will proceed.

4.2.3. The group will seek to maintain commercial or business relationships with third parties that promote the values described in this policy, and those that refrain from performing acts of corruption. Any company in the group that maintains commercial relations with that third party must make sure the latter knows and agrees to the terms of this policy in writing.

4.2.4. Associates and third parties are required to notify any knowledge of an Act of Corruption, with the understanding that the omission of this notice shall be deemed as a breach of this policy.

4.2.5. Where an associate or third party has made use of resources of the group to commit an Act of Corruption, he/she should restore completely these resources to the group, regardless of the sanctions or procedures that the group could exercise against that associate or third party.

### 4.3 **Influence Peddling**

- 4.3.1. It is forbidden to any associate and third parties to make use of Influence Peddling.
- 4.3.2. In the case that an associate is a victim or has knowledge of influence peddling, he/she must notify the Ethics Committee to determine the way the group will proceed.
- 4.3.3. Associates and third parties are required to notify any knowledge of influence peddling, with the understanding that the omission of this notice shall be deemed as a breach of this policy.

### 4.4 **Incentives and Gifts**

- 4.4.1. It is forbidden to any associates to accept any amount of money or equivalent by a third party, and that should be notified to the Ethics Committee.
- 4.4.2. It is forbidden to give or offer to any third party, economic incentive that is not expressly stated in the respective contract.
- 4.4.3. In case that an associate receives a gift from a third party, in order to be accepted, it must be notified and approved in writing by the Vice-President of the department and, if the value exceeds the amount of \$1,000.00 (one thousand Mexican Pesos) that should be notified for approval of the Ethics Committee.
- 4.4.4. In case you want to give a gift to a third party, you must obtain the approval of the Vice President of the department and, if the value of the gift exceeds the amount of \$1,000.00 (one thousand Mexican pesos), it must obtain the approval of the Ethics Committee. Since any gift must be fully aligned with the image and reputation of the Company, this gift should not exceed, under any circumstances, the amount of \$10,000.00 (ten thousand Mexican pesos).

#### 4.5 **Donations**

4.5.1. Donations to political parties are forbidden.

#### 4.6 **Notification**

4.6.1. All notifications should be sent to the Ethics Committee at the following email address: [comitedeetica@genommalab.com](mailto:comitedeetica@genommalab.com).

#### 4.7 **Sanctions**

4.7.1. A policy breach by an associate may result in the dismissal and further legal action through labor, civil, commercial or criminal process, to be determined by the Ethics Committee.

4.7.2. A policy breach by a third party may result in the termination of the commercial relationship, and legal action through civil, commercial or criminal process.

#### 4.8 **Knowledge and Acceptance Policy**

4.8.1. All the employees must sign the *Acknowledgement of Receipt and Commitment of the Anti-Corruption Policy*, which certifies that they know and understand the scope of this policy.

4.8.2. The Vice-President of Business Development is the responsible person for communicating this policy, as well as collecting and safeguarding the *Acknowledgement of Receipt and Commitment of the Anti-Corruption Policy*.

4.8.3. Those associates who are the contact with a third party should show this policy for its acknowledgement, and proceed in accordance with the provisions in the item 4.2.3.

4.8.4. The group will implement training and information programs to promote the knowledge and application of this policy.

4.8.5. Anything that is not directly covered by this policy and / or any dispute about it will be resolved by the Ethics Committee.



# ACKNOWLEDGEMENT OF RECEIPT & COMMITMENT ANTI-CORRUPTION POLICY

Hereby I confirm that I have full knowledge of the *Anti-Corruption Policy* issued by Genomma Lab Internacional S.A.B. de C.V., and that I understand all of its content and scope.

I agree to comply with all provisions of this policy, and in case I need more information, I will contact the Department of Human Resources.

**Name:** \_\_\_\_\_

**Department  
& Role:** \_\_\_\_\_

**Company:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Location:** \_\_\_\_\_

**Signature:** \_\_\_\_\_



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