

1. Objective

1.1. This policy about the use of Confidential Information (the “Policy”), has the objective of establishing specific guidelines, derived from the Genomma Code of Ethics and Conduct, to maintain confidentiality of the information of Genomma Lab Internacional S.A.B. de C.V and its direct and indirect subsidiaries (together as “Genomma” or the “company”) have, to ensure that its use is only for Genomma, keeping its confidentiality.

2. Scope

2.1. This Policy applies to all Genomma counselors and employees, independent of the place they reside or where they operate the business, as well as Genomma’s direct and indirect subsidiaries, agents, consultants, suppliers, customers, business partners and any other third party that has access to Confidential Information (the “Obligated Entities”).

2.2. This also applies to desk computers, laptops, servers, printers, cellphones, mobile devices and other equipment, as well as applications, software in which information is stored, and/or through which Confidential Information is managed, including internal users, temporary employees or visitors.

3. Definitions

3.1. The following terms, used with an initial capital letter in this Policy, have the following meanings (all terms that are used in a singular form in this Policy will have the same meaning when they are used in plural form and vice versa):

A. **Confidential Information:** Include but is not limited to data, notes, analysis, compilations, documents, videos and any information property or in the possession of Genomma, including but not limited to research projects, industrial property projects, formulas, knowhow, trade secrets, raw material, technical knowledge, marketing, commercial information, distribution data, logistics data, purchasing data, legal information, financial information, business information, supplier and customer information, price calculations, sales systems, potential customers or partners, strategic projects and new past, present and future businesses in Mexico as well as abroad.

B. **Obligated Entities:** The meaning is attributed in the first paragraph of section 2 of this Policy.

4. Roles and Responsibilities

4.1. Global Legal Management: Provide legal advice to Genomma and the Obligated Entities that require it in relation to matters of Confidential Information under this Policy.

4.2. Obligated Entities: Meet (i) the confidentiality, protection and management obligations of the Confidential Information established in the Policy, (ii) the existing confidentiality obligations in the confidentiality agreements or contracts signed by the Obligated Entities and (ii) the other obligations regarding confidentiality, trade secrets, privileged information, technical, commercial and manufacturing secrets, professional secrets and other aspects in applicable laws of the countries where Genomma operates.

5. General Aspects

5.1. All Obligated Entities must maintain and assure confidentiality of all Confidential Information to which they might have access to in a verbal, visual, printed, saved in magnetic storage, microfilmed or provided through any other form, without the need of the Confidential Information disclosure. The Confidential Information that is delivered to an Obligated Entity makes up a valuable, special and unique good for Genomma that represents or may represent an advantage for the company when competing in the corresponding markets and/or projects and/or businesses.

5.2. Without limiting and in addition to the Confidential Information definition established in section 2 of this Policy, Confidential Information also considers information that is published to employees as an effort to keep them informed and updated with work activities. Confidential Information also includes information that is collected, acquired or developed during the end of the contracting period of Genomma’s employees, including the information that is originated by employees acting alone or in combination with another Genomma employee or third party, such as trade secrets.

5.3. Any request for the dissemination of Confidential Information must be managed by authorized trained people and must be immediately reported to the Global Legal Management.

5.4. Any noncompliance to this Policy on behalf of the Obligated Entities, may result as a consequence, among others, (i) in the immediate and justified termination of the work relation among the Obligated Entity and the Genomma entity, corresponding to the employer of such Obligated Entity, and (ii) in the commercial or legal termination with the Obligated Entity that is a customer or supplier of Genomma.

All previously mentioned, regardless of, and in addition to other civil, administrative and penal actions that Genomma could appeal to for the restoration of damages caused to Genomma by the noncompliance of the Obligated Entities to this Policy or any other of their obligations with regards to Confidential Information.

5.5. In addition and without limiting the obligations that originate from this Policy, any Obligated Entity that has access, by any means, to Confidential Information, must sign, previous to the transferring of Confidential Information, a document, agreement or contract, through which, the Obligated Entity is obliged to keep confidentiality of all received Confidential Information and meet the other obligations regarding such Confidential Information.

These confidentiality agreements or contracts must be reviewed and authorized by the Management or the head of the area of the Global Legal Leadership.

Due to the confidentiality of the Genomma processes, when visits are required at any of the Genomma facilities (plants, distribution centers, etc.), the plant visitor rules must always be complied with.

In each and all of the visits previously described, the confidential information accessible to the visitors regarding raw materials and production processes, must be managed closely. This is why visitors may only visit and receive information of basic systems and equipment.

It is strictly forbidden that any visitor to the Genomma facilities enters with cameras, video, recording equipment or any other device that serves to register images and information, unless authorization is granted by the Global Legal Management.

Once the (i) sharing purpose of Confidential Information to Obligated Entities is over, and/or (ii) the work or commercial relation has ended with the Obligated Entity who has had access to Confidential Information; the Obligated Entity will have, as chosen by Genomma, to return all Confidential Information, including the means in which Confidential Information is stored or oath to say such Confidential Information has been destroyed.

6. Compliance

6.1 Obligatory nature: Compliance to this Policy is mandatory. All employees must sign the Confidential Information Acknowledgment of Receipt, which states that the knowledge and scopes of this policy are known and understood, (Annex 1).

6.2 Noncompliance: The noncompliance of this Policy may result in the training, disciplinary punishments and/or legal actions, depending on the magnitude and nature of the violation or noncompliance. Any violation to this policy must be immediately reported to the Global Legal Management to assess the reported violations.



Jorge Luis Brake Valderrama
CEO
June, 2020

CONFIDENTIAL INFORMATION POLICY ACKNOWLEDGMENT OF RECEIPT

Through this I confirm of having plenty of knowledge about the Confidential Information Policy emitted by Genomma Lab Internacional, S.A.B. de C.V., understanding all its content and scope.

I commit to comply with all that is established in this Policy and in case more information is required regarding this, I will contact the Human Resources Department.

Name: _____

Department and position: _____

Company: _____

Date: _____

Place: _____

Signature: _____

Print and turn in to Human Resources, when filled out.