

OBJECTIVE

1.1 The main objective of our Anti-Corruption Policy (hereinafter, this "Anti-Corruption Policy" or the "Policy") of Genomma Lab Internacional, S.A.B. de C.V. and its direct and indirect subsidiaries ("Genomma"), is to ensure that Genomma complies with:

- The General Law of Administrative Responsibilities (the "LGRA"), of the United Mexican States.
- The U.S. Foreign Corrupt Practices Act ("FCPA").
- The criminal liability regime applicable to private legal entities in the Republic of Argentina.
- Other local anti-corruption and anti-bribery legislation in the countries where Genomma operates.

Unless otherwise specified, all references to "Anti-Corruption Laws" refer to both the LGRA, the FCPA and the anti-corruption laws of the countries in which we operate.

1.2 This Anti-Corruption Policy strictly prohibits:

- Pursuant to the Anti-Corruption Laws, any direct and/or indirect form of corruption, bribery and/or similar or analogous acts contemplated in said Anti-Corruption Laws, in the public sector and/or in the interactions that Genomma has with Public Officials.
- Corruption and other similar or analogous acts, such as, but not limited to, influence peddling in the private (commercial) sector where we operate and conduct business.
- Soliciting, requesting, accepting, receiving or accepting a bribe, payment for influence or any other improper or illegal inducement, benefit or advantage. All of the above prohibitions shall be interpreted broadly and generically.

In Genomma Lab Internacional, we have a Zero Tolerance Policy towards any practice or act of corruption, in any form, so it is our obligation to comply with the Anti-Corruption Laws, as well as to avoid and report acts of corruption, influence peddling and all similar and/or analogous acts.

SCOPE

This Policy applies to all directors, officers and employees of Genomma Lab Internacional, regardless of where they reside or where they conduct their business, as well as to our direct or indirect subsidiaries, and to third parties over which Genomma has control under IFRS 10 (which includes any other rule that replaces it), including joint ventures, as well as to all agents, consultants, business partners and other third party representatives when acting on behalf of and/or in the name, interest or benefit of our Company.

This Anti-Corruption Policy is global and supersedes any local policy or practice inconsistent with its terms or with anti-corruption laws.

DEFINITIONS

CONCEPT	DEFINITION
CODE OF CONDUCT AND ETHICS	The Code of Conduct and Ethics of Genomma Lab Internacional, S.A.B. de C.V. in force.
ETHICS COMMITTEE	Team in charge of guaranteeing and overseeing proper compliance with the Anti-Corruption Policy.
CIVIL SERVANT	(a) any officer or employee of a governmental body, whether elected or appointed, acting in such capacity, representing any level of government, federal, local or municipal, and any branch of such government, whether executive, legislative or judicial; (b) any political party, political party official or candidate for any elective office; (c) any official or employee of public international organizations, such as, but not limited to, the United Nations and the World Trade Organization; (d) the spouses, blood relatives and/or civil relatives of any of the persons listed in subsections (a) through (c) of this section. 3.1.4. as well as third parties with whom any person has professional, labor, corporate or business relationships, including companies of which the aforementioned persons or entities are part.

GENOMMA	Genomma Lab Internacional, S.A.B. de C.V. and its direct and indirect subsidiaries.
IFRS	International Financial Reporting Standards, which are the accounting and financial reporting rules applicable to Genomma, including their modifications, updates, as well as any other financial reporting and accounting rules that may replace them.
THIRD PARTIES RELATED TO GENOMMA	Any individual or legal entity that has a contractual, service and/or any other type of commercial relationship with Genomma.
INFLUENCE PEDDLING	Any act derived from the use of personal, commercial and/or institutional relationships, economic and/or political power, position and/or commission with the intention of making a Public Official and/or a third party perform or refrain from performing an act with the purpose of obtaining or keeping, for himself or for a third party, some benefit or unfair advantage; regardless of the acceptance of the public servant or servants or the result obtained.
JOINT VENTURES	Also known as joint venture is an agreement between two or more parties to work together toward a shared goal. It is often used as a business strategy, but can also serve personal goals.

1. POLICY

1.1 IMPROPER PAYMENTS

Consistent with the provisions of the Anti-Corruption Laws, and without prejudice to the generality of the prohibitions set forth in Section 1.2 of this Anti-Corruption Policy, this Policy prohibits paying, offering to pay or authorizing to pay, directly or indirectly, anything of value to any Public Official for the purpose of obtaining or securing business, sending business to any person or for the purpose of obtaining an improper business advantage. It is not necessary for a thing of value to actually change hands to violate the Anti-Corruption Laws. An offer, scheme or promise to pay or give anything of value may constitute a violation. Specifically, the elements of improper payments under this Policy are as follows:

- a.** Offering, promising or authorizing a payment of money or anything of value (including payments in kind) directly or indirectly to any Public Official; for the purpose of:
 - a. To obtain or retain business.
 - b. Sending business to a person.
 - c. Obtaining an undue business advantage.

1.2 ACCOUNTING BOOKS AND RECORDS

A. Pursuant to the provisions of the FCPA, and without prejudice to the generality of the prohibitions set forth in Section 1.2 of this Anti-Corruption Policy, this Policy prohibits the falsification of accounting books and records and requires compliance with certain accounting provisions, in accordance with the Anti-Corruption Laws.

The purpose of the books and records provisions of the Anti-Corruption Laws is to prevent companies from concealing bribes, improper payments or engaging in fraudulent accounting practices.

- B.** The provisions on accounting books and records require, among other things, the following:
 - a.** Maintain books, accounts and records that reflect the operation and disposition of cash in the Company.
 - b.** Maintain an internal control accounting system that can detect and prevent illicit payments to public officials.
 - c.** That the operations conform to generally accepted accounting principles or IFRS, as applicable.

1.3 INFLUENCE PEDDLING

A. Pursuant to the provisions of the Anti-Corruption Laws, and without prejudice to the generality of the prohibitions set forth in section 1.2 of this Anti-Corruption Policy, the use of Trading in Influence is prohibited.

1.4 TRAVEL EXPENSES AND PROMOTIONAL VISITS

A. Payment or reimbursement by Genomma of travel expenses of Government Officials is strictly prohibited.

1.5 BUSINESS LUNCHES

A. Accepting special meals from customers, suppliers or third parties related to the Company, for personal benefit or with the purpose of influencing a business decision, is prohibited.

B. Offering meals of any kind or amount to Public Officials, suppliers or individuals, with the intent to influence or induce the recipient to do anything that would help Genomma secure or maintain any improper benefit or advantage, is prohibited.

C. It is prohibited to order meals from Public Officials or private individuals, knowing or assuming that, in return, the Public Official or private individual expects to receive any undue benefit or advantage.

1.6 "FACILITATION", "KICKBACK" OR "KICKBACK" PAYMENTS

A. Payments (of any nature, whether in cash or in kind) of "facilitation", "kickbacks" or "kickbacks" to Public Officials, for the purpose of expediting, facilitating, accelerating, obtaining and/or securing, are strictly prohibited:

a. Any governmental functions, even if they are non-discretionary or routine; and **C.** Any procedure and/or management before any authority.

b. A favorable treatment by a Public Official, in exchange for an improper payment using Genomma funds. This is known as "Kickback".

1.7 INCENTIVES AND GIFTS

A. It is prohibited to accept cash and/or anything of value from a Genomma Related Party for personal benefit or for the benefit of family members if accepting such thing of value would lead to, or give the appearance of losing or impairing objectivity, independence, freedom and ability in the performance of activities, and/or in decision making, related to Genomma's operations. In the event of any such occurrence, the Ethics Committee must be notified.

B. It is forbidden to grant or offer to any Third Party Related to Genomma, an economic incentive that is not expressly established and/or contemplated in the respective contract and/or in the commercial and/or service conditions agreed upon.

C. In the event that a Genomma employee receives a gift from a Genomma-Related Third Party and provided that such gift has not been given for the purposes set forth in section 4.7.1 of this Policy, for its acceptance, the Vice President of the corresponding area must be notified and obtain written approval and, in the event that the value of such gift exceeds the amount of \$1,000.00 (one thousand pesos 00/100 M.N.), the Ethics Committee must be notified and obtain approval.

D. In the event that a gift is to be given to a Genomma-Related Third Party, the prior written approval of the Vice President of the area must be obtained and, in the event that the value of such gift exceeds the amount of \$1,000.00 (one thousand pesos 00/100 M.N.), the approval of the Ethics Committee must be obtained. It is understood that any such gift to a Genomma-Related Third Party must be fully identified with the Genomma image and/or logo and such gift to such Genomma-Related Third Party may not for any reason exceed the amount of \$10,000.00 (ten thousand pesos 00/100 M.N.).

1.8 DONATIONS

A. Donations to political parties made on behalf of, and/or in the name, directly or indirectly, of Genomma are prohibited. Notwithstanding the foregoing, employees may participate in political activities, provided they do so in a personal capacity, using their own financial resources and personal time. In these cases, they are prohibited from making any reference to Genomma, and under no circumstances will Genomma reimburse expenses related to political activities or any type of contribution made by the employees in their personal capacity.

1.9 CHARITABLE, CHARITABLE DONATIONS OR CHARITABLE DONATIONS

A. In the case of charitable or charitable donations that are intended to provide financial support and in kind through agreements with legal entities authorized to receive deductible donations under the terms of applicable laws, in order to promote and/or strengthen their activities, each of the

contributions, donations and sponsorship, if any, must be verified before they are granted, in order to ensure that they are carried out in a transparent manner, always with a disinterested purpose and without entailing an advantage in favor of Genomma.

1.10 NOTIFICATIONS AND OTHER PROVISIONS

- A.** Genomma shall endeavor to maintain commercial and/or business relationships with third parties that promote the guidelines and parameters established in this Policy.
- B.** Employees and Related Third Parties are obliged to notify any knowledge of an Act of Corruption, in the understanding that the omission of this notification will be considered a breach of this policy.
- C.** In the event that an employee or Third Party uses Group resources to commit an Act of Corruption, the employee or Third Party shall fully reimburse the Group for such resources, regardless of any sanctions or procedures that the Group may exercise against such employee or Third Party.
- D.** All notifications related to this policy should be made through the "GEN- Te Escucha" ethics hotline channels corresponding to each country.
- E.** In the event that an employee is a victim or has knowledge of an Act of Corruption, he/she must refrain from doing so and notify the Ethics Committee so that it may determine the Group's course of action.
- F.** The Group shall endeavor to maintain commercial and/or business relationships with Third Parties that promote among its employees the values described in this policy, and shall refrain from engaging in acts of corruption.

Any Genomma Company that maintains business relations with such Third Party shall ensure that the latter knows and accepts in writing the terms of this policy.

1.11 PENALTIES

- A.** In the event of non-compliance by an employee, the employment relationship may be terminated and legal action may be taken in labor, civil, commercial and/or criminal proceedings, which will be determined by the Ethics Committee.
- B.** In case of non-compliance by a Third Party, the termination of the commercial relationship and the exercise of legal actions by commercial, civil and/or criminal means may be determined.

1.12 KNOWLEDGE AND ACCEPTANCE OF THE POLICY

- A.** All employees must sign the Acknowledgement of Receipt and Commitment of the Anti-Corruption Policy, in which they acknowledge that they know and understand the scope of this policy.
- B.** The Global Human Resources Department will be responsible for communicating this policy, as well as for collecting and safeguarding the "Acknowledgement of Receipt and Commitment to the Anti-Corruption Policy".
- C.** Employees who are the Group's contact with a Third Party shall make them aware of this policy and shall make it known in terms of the provisions.
- D.** The Group, in order to promote the knowledge and application of this policy, will conduct training and/or information campaigns.

Anything not provided for in this Policy and/or any dispute about this Policy shall be resolved by the Ethics Committee and, if applicable, the Board of Directors. Additional anti-corruption policies may be implemented in the countries where Genomma operates, but only to the extent that they are consistent and harmonious with the provisions of this Policy.



Marco Sparvieri
CEO
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