

► OMNILIFE-CHIVAS GROUP CODE
OF ETHICS
AND CONDUCT

OMNILIFE
PEOPLE TAKING CARE OF PEOPLE

Chivas



Chivas®

OMNILIFE
PEOPLE TAKING CARE OF PEOPLE

educare+
ESCUELA PARA EL ÉXITO

SEYTU
TAKE CARE OF YOUR BEAUTY

KENYA
VERGARA

OMNI
HUMANA

OML®
AGENTE DE SEGUROS
Y DE FIANZAS

OMNIDATA

OMNIA
DE GUADALAJARA

► LETTER FROM THE PRESIDENCY

SINCE THE FOUNDING of our Purple World and up to now, we have tried and achieved long-term relationships on excellent terms with each of the stakeholders linked to our Company.

We have been dedicated to the task of forging and maintaining a **REPUTATION**, task that will follow us to each of the challenges and goals we set for ourselves. We captivate by mentioning the **OMNILIFE-CHIVAS**, name, by recognizing us as a globalized Company, with the capacity to offer world-class products and services. With a privileged place within the food, sports, goods, and services industry.

Strengthening our position entails our commitment to “*be*” what we “*want to be and should be*”. Acting day in and day out with high ethical standards, which govern us with values of legality, leadership, transparency, integrity, responsibility, loyalty and respect.

To all of us who are part of the **OMNILIFE-CHIVAS** family, we invite you to consult constantly our Code of Ethics and Conduct, which beyond being a guide, is an echo of the behaviors that have allowed us to generate the power of our brand, as well as the prestige for which we are all responsible.

Being aware that each of our individual actions has an effect on everyone, is precisely where our strength lies, which will give us the guideline to continue finding **the path to Transcend**.

Amaury Vergara Z

AMAURY VERGARA
OMNILIFE-CHIVAS Group President





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► 1. PROLOGUE

► PURPOSE:

OMNILIFE IN EVERY HOME

To build a Code of Ethics and Conduct that helps us to establish a framework of principles, values and rules that ensure ethical behavior and responsibility in the performance of their duties, in working relationships, and in interactions with the people to whom we provide products and services. Our Code is complemented by a set of policies, which provide more detail on how we deal with specific issues.

Our values constitute an essential part of our culture therefore; we take seriously any report about illegal practices or inappropriate conduct detected in the company.

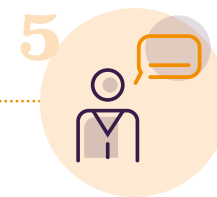
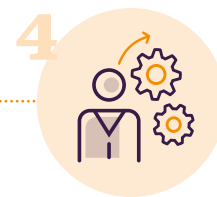
► SCOPE:

This applies to all employees of **OMNILIFE-CHIVAS Group** and companies it comprises, as well as shareholders in the different countries where we have a presence or carry out activities. All staff must understand and observe the Code. Partners, contractors, consultants, suppliers, temporary workers and trainee distributors are also expected to observe the Code.

► DEFINITIONS:

- 1 Code of Ethics and Conduct:** A set of norms and values intended to regulate the conduct of people within the context and environment of a work center, setting out mandatory compliance.
- 2 Ethics Committee:** A group of multidisciplinary people belonging to different departments that makes up the **OMNILIFE-CHIVAS Group**.
- 3 Staff with Personnel under their responsibility:** Held by Executive Management, Managements, Coordination, Supervisors, among others.
- 4 Bribery or Extortion:** An offer, promise, giving, acceptance or request of an unjustified advantage of any value (which may be of a financial or non-financial nature), directly or indirectly. And regardless of its location, in violation of applicable law, as an incentive or reward to a person to act or refrain from acting in connection with the performance of that person's duties.
- 5 Terrorism Financing:** The contribution or collection of resources of any nature with the knowledge that they will be used to finance or support activities intended to cause alarm, fear or terror in the population, to threaten national security and/or to pressure the authority or the population to take a decision.

- 6 Money Laundering:** Process through which a person or a criminal organization processes financial gains, resulting from illegal activities, to try to give them the appearance that they are resources obtained from licit activities and thereby introduce them into the financial market under the appearance of legality.
- 7 Conflict of Interest:** Situations in which a subject's judgment regarding his or her primary interest and the integrity of his or her actions are improperly influenced by a secondary interest, which is often economic or personal.
- 8 Embezzlement:** Misappropriation of money belonging to the State by persons in charge of its control or administration.
- 9 Staff:** The personnel or members that make up the organization.
- 10 OMNILIFE Distributor:** It is an Independent Commercial Distributor, whether an individual or a legal entity, who has a commercial relationship with OMNILIFE covered by the Contract.



► RESPONSIBILITIES:

ETHICS COMMITTEE

- Promote ethics and integrity in the organization; promoting, monitoring and enforcing compliance with the Code of Ethics and Conduct, carrying out strategies and specific actions for dissemination, training and evaluation of results, risk prevention of acts of corruption and/or non-ethical behavior.
- It is the responsibility of all areas to promote compliance with the Code of Ethics and Conduct.

CONTROLLER GENERAL'S OFFICE

- The presence of the Comptroller General's Office within the institution strengthens the Group's ethical image with its staff and shareholders, as it denotes a sense of fairness and transparency.
- Oversees ethical compliance within the company, following up on reported cases and establishes sanctions for failures against the Code of Ethics and Conduct.
- Manage cases with strict confidentiality regardless of the impact to the company or the complexity involved in the investigation process.
 - Review the guidelines, policies and procedures that ensure the conduct of our activities in accordance with the Code of Ethics and Conduct.
 - Promote the work within an Institutional Culture.

BOARD OF DIRECTORS, EXECUTIVE PERSONNEL AND STAFF WITH PERSONNEL UNDER THEIR RESPONSIBILITY

In **OMNILIFE-CHIVAS Group** we conceive that key positions imply greater responsibilities, therefore, those who occupy these positions must be a role model, being those who have greater responsibility in compliance with the codes and standards established in this policy. Likewise, they must exercise leadership and congruence in their words and actions, thus leaving an ethical and coherent testimony.

STAFF

All **OMNILIFE-CHIVAS Group** members have the obligation to comply with and abide by, as well as to ensure, to the extent of our reach, compliance and observance of this Code, being a positive influence on society.

INTERESTED PARTIES

In **OMNILIFE-CHIVAS Group** we seek strategic alliances that help us achieve success in our objectives, so we seek and ensure that our business partners (suppliers and / or customers) and related third parties comply with the measures set forth in this Code, their respective policies and that within the same include a vision with a perspective of integrity.

DAC

The Document Administration Center is the department where **OMNILIFE-CHIVAS Group** advises, concentrates and safeguards its manuals, codes, policies, procedures, among others, which are supported by the organization and senior management, which may be consulted at any time. In order to observe the information established in order to carry out the activities corresponding to your area, these must be aligned to the strategies and objectives of the group.

▲ **IT IS THE RESPONSIBILITY AOF THIS AREA TO CONFIRM THEIR VALIDITY, ENSURING THAT THE OWNERS OF THESE DOCUMENTS ARE UPDATED IN ACCORDANCE WITH THE NEW MARKET REQUIREMENTS AND THE GROWTH OF OUR *KNOW-HOW* WITHIN THE INDUSTRY TO WHICH WE BELONG.**

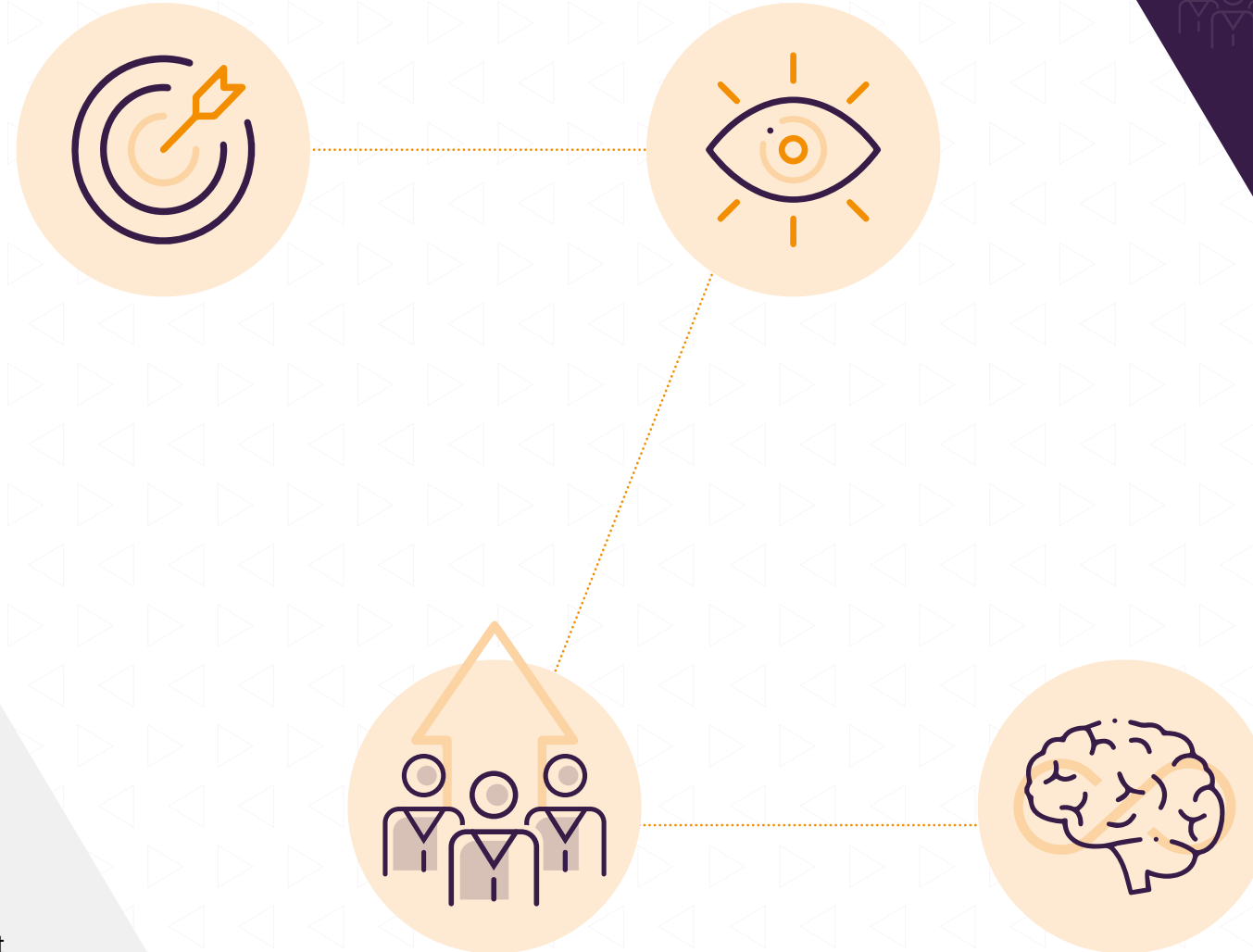
► 2. CORPORATE IDENTITY

► MISSION

We are a company with a network of sustainable, dynamic and institutional businesses dedicated to health, sports, goods and services, which seeks to connect with customers, partners, staff, suppliers, community and government, to meet the needs of each of them. We work hard to grow our business internationally, based on our values and the philosophy we have earned with effort and perseverance.

► VISION

To be the most innovative company in all its operating models, exceeding the expectations of quality and service, we want to offer our audience the best experience achieving a great connection with each of them. Our focus is to have a significant impact with our people, planet and communities at an international level, projecting ourselves to be a role model for our competitors.



► VALUES

- **Legality:** To know and fully comply with the applicable regulations.
- **Leadership:** To guide business practices towards excellence in service and competitiveness.
- **Transparency:** To act in a clear manner, with no room for doubt regarding the intention, means, purpose or results of such actions.
- **Integrity:** Act with rectitude, honesty and congruence.
- **Responsibility:** To work in a timely, efficient and effective manner in all the company's tasks.
- **Loyalty:** It is the expression of our ability to be faithful to ourselves, to another person or to the institution to which we belong.
- **Respect:** Dialogue with consideration and tolerance to the differences between people.

► OUR PHILOSOPHY

We have established the essence that indicates the course and creates the precedents to develop and implement.

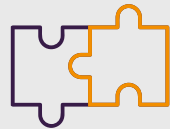
Our business is to promote the integral well-being of every person who relates to **OMNILIFE-CHIVAS**. Therefore, we make sure to positively influence their health and emotions in harmony with their environment. We are a family that grows and evolves day by day, where we believe that all dreams are important and, together, we are the bridge to achieve them, creating opportunities, challenges and, above all, individual and collective growth through our products and services.

We like to talk about how well we are doing and spread our abundance, we like to commit ourselves to go beyond the standard, trusting in each one of us to achieve each goal, aware that we are.... *People Taking Care of People.*



CONNECTION

Our expansion is through the formation of strong bonds among our collaborators. Here each person is organically motivated to create networks of trust and share knowledge, always taking care of others in pursuit of the common good.



INTEGRATION

We take into account the opinion of our people always amalgamated in unity, truth, seeking the good and beauty in personal and collective fulfillment. Without distinction of gender, age, orientation, or beliefs.



EVOLUTION

We value new ideas, nurture them and encourage their generation, because our vision leads us to innovation and, without fear, to their execution. We expand rapidly around the world in every dream we touch. Always learning and improving in what we do, where mistakes are transformed into catalysts for excellence.



TRANSCENDENCE

It is our Burning Desire to transform lives. We promote, with our conduct, the values of order, cleanliness and transparency in our actions. We are inspired to make a better world and to paint more lives in purple, day in and day out.

► MANIFESTO REACT

We are in a moment of change. We have entered a new stage of deep reflection and reconnection with our values and tradition, but above all with our reason to exist: **To inspire Mexico.**

Change begins with oneself, confronting and questioning the ideas and ways we are used to, without ever losing sight of the essence of Chivas, as well as the four new pillars that will support our home and our cause, which are: **Connection, Integration, Evolution and Transcendence.**

Let's put into action all those ideas we have and propose solutions to identified problems, always working as a team and optimizing processes to bring our institution to standards never before seen.

Actions and Re-Actions Let's act as a team, integrating and evolving, transcending Chivas to the place it deserves.

With you we write this great history.
Let's inspire Mexico.



CONNECTION

Let's form strong bonds and networks of trust, always working together.



INTEGRATION

Let's build a single team that deserves to win.



EVOLUTION

Let us always propose new ideas to transform and improve our institution.



TRANSCENDENCE

Let's leave our mark, let's challenge the established without limits. Let us inspire Mexico.



► 3. A SAFE AND RESPECTFUL COMPANY

► HUMAN INTEGRITY, EQUITY AND DIVERSITY

In **OMNILIFE-CHIVAS Group** we know that talent is different, therefore, we respect the identity and living conditions of each person and promote equal treatment and opportunities. In our Company no employee will be discriminated against for reasons of race, sex, sexual orientation, gender identity or expression, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic origin, social status, disability, age, union membership or any other reason contemplated by law in the countries where we operate.

We do not permit retaliation against anyone who reports discrimination, harassment or labor and employment practices. Therefore, we invite you to report any situation contrary to what is described in this code and the Diversity, Equality and Inclusion in the Workplace policy.

Any employee of our Company will be respected and his or her human rights must be guaranteed; in no way will be forced to suffer psychologically any kind of aggravation on account of his/her work.

We do not employ child, forced, bonded or indentured labor. We respect the minimum age requirement for employment; we observe applicable wage and hour laws; we provide staff with all minimum benefits required by law.

We recognize the rights of workers to self-organization and believe that sincere dialogue and direct communication between employees and management is the most effective way to resolve labor issues.

We like to promote diversity, so we want you to feel confident in who you are and that different experiences, values and perspectives are appreciated, without being judged, resulting in unique and happy people in the workplace.

We are committed to respecting the human rights of all people involved in our operations and value chain, aligning ourselves with and respecting the Universal Declaration of Human Rights.

In **OMNILIFE-CHIVAS Group** we promote open communication to facilitate the detection of illegal practices and inappropriate behaviors and we establish formal mechanisms according to the code for their attention. We promote a cordial relationship between managers and staff, always seeking a cordial atmosphere that allows any concern to be expressed.

► NEPOTISM

Granting different or favorable treatment to relatives or close friends within our Group is considered a conflict of interest; therefore, no member of our immediate family may work directly or in the same department as our immediate family.

It is strictly forbidden for directors, managers, legal representatives, key positions, to use their position to influence, intimidate pressure and/or in any way sustain sentimental relationships of any character with the staff dependent on them, voluntarily or forced.

► MULTICULTURAL COMPANY

We are located in different countries with different cultures, beliefs and regulations, so we are respectful of the environment, customs and local practices, likewise we conduct all our business under schemes that do not violate the law or are contradictory to our philosophy and beliefs.

In this way, cultural diversity makes us a source of new knowledge that allows us to achieve success in today's world.

► WORKPLACE CLIMATE

It is the intention of **OMNILIFE-CHIVAS Group** to guarantee that the productive and administrative processes are developed under humane working conditions. The Company's hiring model is in accordance with current regulations, the remuneration system is fair and equitable, disciplinary measures and working hours are applied according to the laws of each jurisdiction. Staff is free to exercise their right to associate and bargain collectively. A balance between work responsibilities and personal and family life is promoted. Talent is developed, creativity is stimulated, passion is encouraged, and good management is celebrated and recognized.

The **OMNILIFE-CHIVAS Group** expects its suppliers and customers to also guarantee adequate working conditions for its staff, in compliance with the legal requirements applicable according to the jurisdiction in which they carry out their activities, and in any case, respectful of human rights.

At **OMNILIFE-CHIVAS Group** we promote joy, optimism, commitment, passion, respect and cordiality as guiding principles that allow us to make our Company an excellent place to work and bring us closer to our strategic objectives.

► OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL IMPACT

In **OMNILIFE-CHIVAS Group** the main objective of occupational health and safety is the application of the appropriate measures to avoid and/or minimize as much as possible the risks at work, as well as to promote an integral state of health among workers.

Prevention is achieved through the training and awareness of workers on the need to follow to the strictest detail all the protocols, standards and safety measures that exist in the different business units.

All business conducted by the company must be done in a sustainable and environmentally responsible manner.

We work with governments and society to have effective impacts that support environmental improvement, maintain open communication with our staff, contractors, communities and related parties to disseminate our improvements.

► SUBSTANCE ABUSE

Persons who are under the influence of alcohol or illicit drugs may be impaired in their ability to perform their work and put the safety of themselves and others at risk. Working in an impaired state is prohibited and harmful substances are not allowed to interfere with the safety or productivity of yourself and/or others.

In **OMNILIFE-CHIVAS Group**, the manufacture, supply, possession or use of illicit drugs and alcoholic beverages is prohibited.

Maintaining integral health is an important issue for us, which leads us to carry out programs of various kinds for young people, who will be the drivers for the development of a better future.

► COMMUNITY

Our way of operating as a responsible Company is fundamental to our business model, as it allow us to create positive brands that generate core impacts for **OMNILIFE-CHIVAS**, followed by our society. We seek to build a better future by knowing the expectations of our shareholders, and managing the impacts they have on the company, as well as working with third parties and other shareholders on initiatives that meet this perspective.

In **OMNILIFE-CHIVAS Group**, we have the **Jorge Vergara Foundation**, which promotes support programs and links with the community through:

- 1 In-kind or financial donations
- 2 Corporate volunteering

- 3 Promotion of social welfare and quality of life for vulnerable sectors

- 4 Social responsibility and environmental care through practices such as:
 - Tree planting
 - Water treatment
 - Recycling programs

► **AMONG OTHERS, WHICH CONTRIBUTE TO THE CARE AND PRESERVATION OF OUR PLANET.**

► 4. GOODS AND WORK TOOLS PROTECTION

► PHYSICAL RESOURCES

All staff is responsible for the protection and proper care of Company property, including infrastructure, equipment, machinery and vehicles, which must be used for the purposes designated by the Company. Any instructions, guidelines and/or operating manuals must be known and followed for proper use and to extend their useful life.

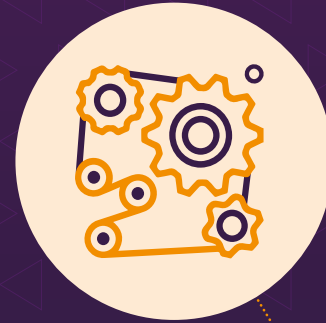
Supplies and resources used to manufacture finished products, provide service to internal or external customers, or to adequately develop our work, must be used efficiently and without waste. We must comply with the policies that regulate the use of the company's economic resources.

► INTELLECTUAL PROPERTY

All the people who are part of the company assume the commitment to care for and responsibly use the information to which they have access, protecting industrial secrets, patents, designs, company trademarks and strategic and financial information, essentially consisting of: manufacturing processes, information systems and the commercialization model.

In the event that an employee leaves the **OMNILIFE-CHIVAS Group**, he/she shall maintain the commitment to which he/she is bound by professional ethics not to disclose any information that may affect the company.

When required to share information owned by the Group, all necessary security measures established in our policies and procedures for such purposes must be taken.



► WORK TOOLS AND MEANS OF COMMUNICATION

Electronic means such as computer equipment, telephones, furniture, software, e-mail, as well as the institutional page on the Internet and social networks must be used for purposes established by the company.

Avoid using them for personal, political, religious or business purposes outside the organization.

OMNILIFE-CHIVAS Group employees are committed to prevent the waste or loss of goods, resources, materials and work tools, as well as to prevent third parties from using their materials, fixtures, furniture, equipment and office utensils, and in general the furniture and real estate owned or at the service or benefit of the same.

▲ These commitments involve, among other things:

- To protect and care for the company's assets that are available or to which one has access, thereby preventing theft or damage to equipment.
- They must be used in a manner consistent with the purpose of the defined job functions.
- Protect the computer systems, maximizing their security measures.
- Use the company's resources rationally to contribute to environmental protection practices.

► 5. SHAREHOLDER RELATIONSHIPS

► CUSTOMERS

Because of our essence and purpose, we seek to maintain long-term relationships with our customers and suppliers by conducting our activities fairly, professionally and with integrity. It is important to avoid discriminating against our customers or markets.

We encourage our customers to comply with the laws, standards and Code of Ethics and Conduct. In the event that our customers are violating any of the points mentioned in this code, it should be reported through the company's internal channels.

In our company, we trade our products in an honest way, we conduct our business in a respectful manner with our customers, which includes respecting the local customs and traditions of each of them.

Maintaining strictly business relationships with our customers without fraternization would avoid a conflict of interest.

The company's staff maintains an appropriately ethical behavior when interacting with our customers, access to their information is protected in accordance with the privacy notice in force and customer proprietary information will only be shared when the owner in writing authorizes or gives instructions to do so.

► SUPPLIERS, PARTNERS AND THIRD PARTIES

OMNILIFE-CHIVAS Group suppliers, partners and other third parties must demonstrate their commitment to the points described in this Code. Any supplier must conduct its activities in compliance with applicable laws, regulations or industry guidelines.

Our purchasing process must be consistent, respectful and confidential. Our criteria for supplier selection are:

- ✓ **Competitive pricing**
- ✓ **Quality**
- ✓ **Delivery times**
- ✓ **Functionality**
- ✓ **Adherence to practices**

Agreements generated with suppliers, partners and third parties must be formalized in writing and must clearly specify the goods and services to be supplied, as well as the prices and contractual legal conditions, such agreements must be related to reasonable market and competition practices.

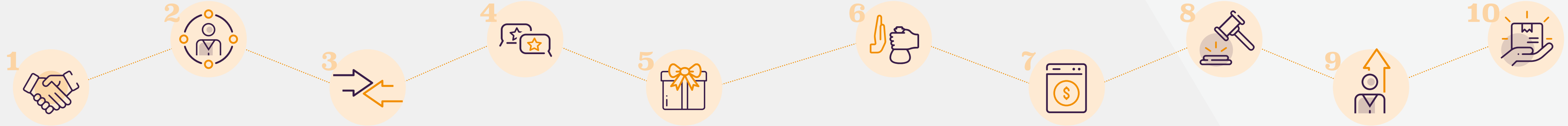
Conflict of interest with suppliers and those acting on their behalf must be avoided in their private activities and in entities in which they, their relatives or close associates have an interest, their business activities with third parties and in the business relationship with **OMNILIFE-CHIVAS**. Suppliers, partners or interested parties must inform **OMNILIFE-CHIVAS** of the existence of conflicts of interest as soon as they become aware of them.

► CONFLICT OF INTEREST

Doing business with other companies involves dealing with other people, so it is expected that our business decisions are based on the best interests of the **OMNILIFE-CHIVAS Group** and not on personal interests. Conflict of interest refers to situations where our interests may influence the decision making process, hindering the interests of the Institution. Exercising a position free of personal interests will avoid any conflict of interest. Identifying situations that create, favor or may favor a conflict is considered a risk, which must be properly managed.

Maintaining long-term relationships with our customers, suppliers and other interested parties is essential for our company; sustaining personal relationships could generate a conflict of interest, which is why it is suggested that the communication that exists between both parties be carried out in a professional manner.

Interested party transactions: it refers to those between an employee and a natural or legal person between whom there is a patrimonial, family and/or professional link; related party relationships are not prohibited, however, they can be interpreted in this way or lend themselves to favoritism, therefore, internal recruitment and purchasing procedures must be followed. Avoid participating or attempting to influence business decisions or negotiations with the **OMNILIFE-CHIVAS Group** that may benefit or appear to benefit a family member, partner or a business venture in which a family member or partner is involved, or direct or indirect financial interests and which go against the interests of the institution.



Any director or employee who believes that he or she may have a conflict of interest is required to make a prompt and full disclosure to the Ethics and Conduct Committee to determine whether such a conflict exists and, if so, whether the Board will waive the conflict.

► COMPETITION

OMNILIFE-CHIVAS Group staff belongs to a large company where we are able to compete in a legal and professional manner.

In **OMNILIFE-CHIVAS Group** we are committed to compliance with applicable regulations, so we seek that our staff and related parties act ethically, preventing unfair practices, so it is forbidden to use unethical or illegal strategies to gain an advantage over our competitors.

Our company does not enter into agreements or arrangements with competitors to gain competitive advantages.

Suppliers and staff may not exchange sensitive information and disclose it within a bidding or tendering process, such as market information, work strategies, prices or issues that may disadvantage free competition.

Any supplier or company participating in a bidding or tendering process must strictly follow the company's internal protocols.

► RECEIVING GIFTS

Executives and staff of the Group's companies must refuse to accept valuable gifts of more than 500 pesos (or the equivalent in other countries), whether in kind or in cash, advantageous conditions, salaries, travel, commissions or any other form of compensation from suppliers, financial institutions, concessionaires, contractors, companies or individuals with whom they do business or plan to do business.

If, for courtesy reasons, you decide to receive a valuable gift due to the business relationship, it must be submitted to the Human Capital Area of your work center. If there is any doubt about the value of the gift they are offered, they should consult with their boss or management. Complying with the above has distinguished us as an honest group.

► ANTI-CORRUPTION AND ANTI-BRIBERY PRACTICES

Corruption and bribery perpetuate poverty and hinder economic development by distorting competition. **OMNILIFE-CHIVAS** is part of the international fight against corruption and bribery

and is part of the United Nations Global Compact, which brings together an important group of organizations that are willing to make changes in their value chain to generate sustainable business.

In the **OMNILIFE-CHIVAS Group** it is strictly forbidden to conceal or carry out activities that lead to acts of bribery, corruption or any activity involving payments of money or in kind, advantages or privileges in order to evade legal, administrative or judicial compliance that aims to take advantage of a negotiation or decision in our favor. The **OMNILIFE-CHIVAS Group** requires that all its suppliers, distributors and third parties acting on its behalf do so with integrity and comply with all anti-bribery laws.

The staff must adhere to what is established within the company's philosophy and this Code of Ethics and Conduct, so they may not intervene in committing acts that go against our essence. Staff may not participate in or cover up negotiations that may result in an illegal act; therefore, they must not receive extraordinary remuneration for participating, negotiating or purchasing products that affect the interests of the company.

In **OMNILIFE-CHIVAS Group**, every person in charge of handling money or securities must conduct himself/herself with the utmost honesty in order to control his/her activities. Any type of deviation of revenues or expenditures on the handling of money or securities by a collaborator must be reported immediately to the different means according to point 9 of this code.

Any asset that is provided to the staff to carry out their activities must be used and returned in the terms and conditions established by the company, obliging them to use it appropriately and to keep it in the best conditions.

The use of funds or assets of the **OMNILIFE-CHIVAS Group** for any illegal, improper or unethical purpose is strictly prohibited. The **OMNILIFE-CHIVAS Group**, through the **Jorge Vergara Foundation**, may offer scholarships, support, charitable contributions or non-commercial sponsorships to improve and advance society in the areas of health, nutrition, sports activities and the formation of values in vulnerable populations. They should never seek to obtain an improper advantage, nor should they be conditioned as part of an agreement with any individual or organization to recommend or promote the Group's products.

► MONEY LAUNDERING AND TERRORISM FINANCING PREVENTION

In the **OMNILIFE-CHIVAS Group** we are committed to society, so all our employees must avoid, with the means available to them, that the resources, elements, goods and assets of **OMNILIFE-CHIVAS** are used for illicit purposes, and must report any situation of suspicion or attempt of bribery, money laundering and/or financing of terrorism, using the means of communication and/or reporting provided in this Code and/or company policies.

In the **OMNILIFE-CHIVAS Group** the resources used to carry out our commercial objective come from lawful activities, our collaborators, business partners, directors, managers and related parties must adopt measures to mitigate the possibility that **OMNILIFE-**

CHIVAS is used as a means for committing operational offenses with resources of illicit origin, financing of terrorism, bribery, embezzlement, corruption and in general all those crimes that are aimed at harming or undermining the preservation of the common good.

► ANTI-TRUST

In the **OMNILIFE-CHIVAS Group** we are committed to comply with all laws and regulations applicable to the business. It is the responsibility of any person to go to his or her immediate supervisor or to the Ethics Committee to seek appropriate advice on legal requirements and other related aspects.

It is strictly forbidden to defame competitors or their products and/or services, as well as to manipulate or distort information for illicit gain, and to engage in practices or conduct that restrict legal and free competition. Special attention must be paid to international business and anti-trust or anti-competition laws. Failure to comply with these laws may have a negative impact on the reputation of the organization and cause legal problems for both the company and our customers.

► EXTERNAL ACTIVITIES

Staff is expected to devote all their time and effort to the interests of the **OMNILIFE-CHIVAS Group** during their regular working hours and any additional time that may be appropriately requested. They are not encouraged to work as officers, staff or consultants for other companies or organizations. Staff should be alert to potential conflicts of interest that may arise from outside activities and be aware that they may be asked to discontinue any outside activities should a conflict of interest occur.

An officer, director, staff or advisor must obtain written permission before accepting a directorship in a publicly traded company.

► RESPONSIBLE SALES AND MARKETING PRACTICES

We are responsible for ensuring that marketing, sales and promotional materials contain truthful and honest information about the **OMNILIFE-CHIVAS Group**, our services and products.

► 6. DATA PRIVACY AND INFORMATION PROTECTION

IN ACCORDANCE WITH THE OMNILIFE-CHIVAS Group's BUSINESS ETHICS, we are committed to comply with international data protection laws to protect the information of internal personnel as well as third parties.

All the information that the organization has is treated correctly and legally, which has a great confidence impact in the organization and therefore, helps to have successful business operations. Safeguarding the confidentiality and integrity of information is a great responsibility, which lays the foundation for reliable long-term business relationships.

Therefore, we must process personal data fairly and lawfully, providing access to it within our organization only when strictly necessary.

When we have to share personal data with third parties as a result of a contractual need, we must ensure that the same strict confidentiality terms and obligations that we comply with are met.

Through internal procedures, we counteract any incident where personal data may be at risk from unauthorized access or disclosure or loss of information.

The information we obtain or use on a daily basis may contain sensitive and/or confidential information, so it is important to avoid disclosing it to people who are not authorized to access it.

▼ Some types of information that exist and are not limiting and must be protected are:

- | | | | | | | | |
|---|--|---|--|--|--|--|---|
| 1

Patents | 2

Formulations | 3

Trade Secrets | 4

Financial Statements | 5

Investment Plans | 6

Accounting Information | 7

Organizational Changes | 8

Customer and Supplier Information |
| 9

Cost Information, Pricing | 10

Research Development and New Products | 11

Salaries and Wages | 12

Business Practices | 13

Financial Forecasting | 14

Business Model | 15

Medical Staff Information | |

Likewise, it is important to protect our systems and networks by being careful not to disclose passwords or accidentally allow access to any of these resources.

OMNILIFE-CHIVAS staff, third parties, legal and quality auditors, internal and external, must keep such information confidential.

Requests for access to information by a governmental authority must be requested in writing and comply with the corresponding legal requirements. Authoriza-

tion for release must be from the corresponding management and the legal area.

Proprietary information and proprietary information of other companies. Proprietary or copyrighted material or documents must be respected. Likewise, the company's confidential information must be protected even after leaving the company.

If you have any doubts about how to handle the issue of confidential information or data protection, ask your immediate supervisor and the Ethics Committee for help through the established means.

7. CORPORATE IMAGE AND REPUTATION

IN OUR COMPANY, THE IMAGE HAS BEEN DESIGNED to have a great impact on society, to generate interest among consumers, to create an organization's identity with the consumer by being *"People Taking Care of People"*; with this we generate the global idea about our products, activity and conduct.

For us, corporate reputation is a fundamental pillar because, by having a favorable perception by our customers and stakeholders, as a result of building products and services in accordance with laws and regulatory compliance, encourages us to achieve success and the objectives proposed by our company.

For us, reputation is an intangible asset that sustains the organization and maintains our functions on a daily basis.

The basic tools and guidelines for the correct use and graphic application of **OMNILIFE** and **CHIVAS** brands must be followed in all their possible expressions, which can be found on the Intranet.

8. COMPLIANCE AND DISCIPLINARY SYSTEM

WE HAVE A DISCIPLINARY SYSTEM that will be applied in the event of non-compliance. Any violation of this Code of Ethics and Conduct by those involved in the **OMNILIFE-CHIVAS Group** will be treated as serious misconduct and will have the consequences described for that purpose in the applicable provisions in force in the jurisdiction in which the offending act occurs.

By virtue of the fact that this instrument applies to shareholders, suppliers, clients, directors and staff of the **OMNILIFE-**

CHIVAS Group and any of its affiliates and/or subsidiaries, as well as its temporary staff, trainees and apprentices, compliance with the same shall be applied in accordance with the various regulations, policies and internal rules of the Company, as well as the legislation in force in each jurisdiction.

Unexpected situations shall be addressed in accordance with the criteria of best management and corporate governance practices.

▲ **ANY VIOLATION OF THIS CODE OF ETHICS AND CONDUCT BY THOSE INVOLVED IN THE OMNILIFE-CHIVAS GROUP WILL BE TREATED AS SERIOUS MISCONDUCT AND WILL HAVE THE CONSEQUENCES DESCRIBED FOR THAT PURPOSE IN THE CURRENT APPLICABLE PROVISIONS IN THE JURISDICTION IN WHICH THE OFFENDING ACT IS COMMITTED.**

► 9. REPORTS OF FAILURE TO COMPLY WITH THE CODE OF ETHICS AND CONDUCT

COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT is the responsibility of all the staff working in the **OMNILIFE-CHIVAS Group**, as well as of the interested parties. It is also our commitment to take the initiative and ask for advice in case we have doubts about how to act in certain situations or report any case that goes against this code. Reports can be made as follows:



1 Reporting to the immediate supervisor



2 With the Corporate Comptroller General area or with the person in charge at Human Capital. Check the directory on the intranet at the following link:
<https://adminrh.omnilife.com/directorio>



3 E-mail: tudenuncia@omnilife.com

▲ **In none of the cases will retaliation be taken**, since the complaint system is designed so that you can make any inquiry or report without affecting your integrity as a person. There is no tolerance, and there will be sanctions for unfounded or bad faith reports, and there will be co-responsibility for the lack of conscious reporting of any violation of the code.

Chivas.

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PEOPLE TAKING CARE OF PEOPLE

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ESCUELA PARA EL ÉXITO

SEYTÚ
TAKE CARE OF YOUR BEAUTY

KENYA
VERGARA

OMNI
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