



ANTI-CORRUPTION

Objective

At **Coca-Cola FEMSA**, we conduct business practices in accordance with the law, in an honest and ethical manner, with zero tolerance for Bribery, rejecting, reporting, and fighting any act of corruption and extortion.

General guidelines

1. To ensure compliance with local laws and regulations in the countries where we operate, we carry out fair and transparent business practices and prevent and discourage Bribery and extortion.
2. We reject any kind of Bribery of Public Officials.
3. As Employees, in our activities inside and outside Coca-Cola FEMSA or on behalf of FEMSA, either directly or through a third party, we do not participate in acts of corruption, therefore:
 - a) We do not order, authorize, or promise to engage in corrupt practices,
 - b) We do not induce anyone to engage in corrupt practices, and
 - c) We do not conspire in their performance.
4. We ensure that relations with external agents, suppliers, consultants, Public Officials and other Intermediaries are always justified in terms of business and are conducted exclusively based on respect, honesty, integrity, transparency and professionalism.
5. In our Contracts we set forth anti-corruption clauses to prohibit corrupt acts and illegal practices, as well as to require compliance with all applicable laws to our Third Parties with whom we interact. We may conduct more detailed audits/reviews of external agents, suppliers, consultants and other Intermediaries with whom we interact, and who are considered high risk according to the Internal Guidelines. In case of any suspicion of non-compliance with the law, including acts of corruption, the relevant Coca-Cola FEMSA Compliance Officer is immediately notified.



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General guidelines

6. We do not authorize compensations to Third parties if there are signs or the appearance that a Bribe will be paid to a Third party, or by such Third party.
7. We establish controls so that no money, Gifts, advantageous conditions, salaries, trips, commissions, or Anything of Value is directly or indirectly, received, given, paid, offered, promised or authorized in the name of Coca-Cola FEMSA or in a personal basis to obtain any Undue Advantage or Benefit of any kind. All Gifts, hospitality, travels, or Entertainment must comply with the Global Standard established for that purpose.
8. We do not make donations (including sponsorships), either in a personal basis or on behalf of Coca-Cola FEMSA to obtain or retain business or to gain an Undue Advantage or Benefit to the company. Any contribution that Coca-Cola FEMSA makes must be permitted under applicable law, made to a community or organization acting in good faith and in accordance with the Internal Regulations established to make Donations. A detailed review must be carried out by Coca-Cola FEMSA Corporate Legal Department or the Legal Department of the corresponding Operation to confirm that the donation complies with the laws and criteria established for the granting of donations and does not directly or Indirectly benefit a Public Official.
9. Political contributions made by us must not be made in exchange for obtaining an Undue Advantage or Benefit and must be made in accordance with the requirements established by local laws in the countries in which we operate, as well as with established internal procedures.
10. We maintain control systems and accounting and administrative recording procedures to prevent and detect illicit payments or payments of a corrupt nature. All payments and transactions are recorded in a complete, correct, and timely manner.
11. Prior the acquisition of an interest in a Third party, by means of a partnership, merger or acquisition, we ensure and document that the Third party generally complies with this policy prior to its acquisition.
12. We establish and carry out training and communication plans, under the responsibility of the corresponding Coca-Cola FEMSA Compliance Officer and with the support of Coca-Cola FEMSA Corporate Human Resources and/or its corresponding Operations, aimed at preventing and raising awareness of acts of corruption to guarantee a culture of compliance with the law.



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Definitions

For the purposes of this Coca-Cola FEMSA Policy, the following terms will have the meanings established herein, both when used in singular or plural.

Anything of Value, includes any type of tangible or intangible benefit that has value for the individual, the Public Official, including his relatives, companies, affiliates, friends or other entities linked to him/her, for example: cash, contributions in kind, product, cash equivalents (gift cards, etc.), advantageous conditions, gratuities, bonuses, discounts, favors, benefits, salaries, commissions, loans, gifts, prizes, food and beverages, political contributions, donations (institutional or charitable), offers of employment, promises of future employment, any type of concession in a contract, product or service, or any other form of compensation.

Bribery, is any payment, delivery, offer, promise or authorization, directly or indirectly, of any amount of money, Gifts, services, travel, commissions or Anything of Value, to any private individual, Public Official or equivalent (including Relatives), to obtain an Undue Advantage or Benefit.

Coca-Cola FEMSA, Coca-Cola FEMSA, S.A.B. de C.V., including all its Subsidiaries.

Coca-Cola FEMSA Code of Ethics, a document that contains Coca-Cola FEMSA's ethical principles, unifies criteria and establishes a common reference framework that gives direction for acting in an integral manner, it is also a useful work tool that guides correct and value-driven decision-making.

Coca-Cola FEMSA Corporate Policies, documents that contain the general principles that govern the conduct of Coca-Cola FEMSA and its Employees in a relevant topic or area, keep order and consistency between Operations and / or mitigate critical or high-impact risks that affect the Operations, and which are authorized by the Coca-Cola FEMSA Chief Executive Officer, or by the Board of Directors, as applicable.

Coca-Cola FEMSA Ethics Committee, a body formed by a representative of Human Resources, Internal Audit, Legal, Finance and the Compliance Officer, which ensures compliance with Coca-Cola FEMSA Code of Ethics, ensures the dissemination, understanding and use of both the Coca-Cola FEMSA Code of Ethics and KOF Ethics Line and guidance in dealing with reports, questions and concerns received in the KOF Ethics Line.



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Employees, unionized and non-unionized workers in Coca-Cola FEMSA's companies.

Entertainment, artistic, cultural, recreational, sporting, and musical events, including, but not limited to, passes and tickets, among others.

Gift, is Anything of Value, tangible or intangible, that is given free of charge to one or more people or organizations.

Indirectly, the use of any means, mechanism or person to carry out a conduct, including through outside agents, consultants, advisers or any other type of intermediary.

Internal Regulations, Coca-Cola FEMSA Code of Ethics, Coca-Cola FEMSA Corporate Policies, Global Standards, processes, procedures, work regulations, and any other internal document authorized by management to have such effects.

KOF Ethics Line, is the formal mechanism that is used by Directors and Employees, as well as by Third Parties with whom Coca-Cola FEMSA has any relationship in the development of its operations, to report any non-compliance and/or possible risk of non-compliance of Coca-Cola FEMSA Code of Ethics, Coca-Cola FEMSA Corporate Policies, and other Internal Regulations, as well as to address any doubts or concerns.

Operation, each of Coca-Cola FEMSA's business units, considered by country or by group of countries according to Coca-Cola FEMSA's organizational management, and which are led by a Director; except when the Internal Regulations refer to the person responsible for compliance (Compliance Officer), the Coca-Cola FEMSA Ethics Committee or any functional area of an Operation, in which cases the term "Operation" will be understood as the business units of Coca-Cola FEMSA considered by country. The countries in which we operate are Mexico, Costa Rica, Panama, Guatemala, Nicaragua, Colombia, Venezuela, Brazil, Argentina and Uruguay.



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Public Official, includes, but is not limited to, any person who holds a job, position or commission in: (i) any branch, level or constituency of government (including the legislative, executive or judicial branches, whether at the municipal, state, federal or national level); (ii) an autonomous public body; a company with state participation; (iv) a public international organization; or (v) a political party. Said term also includes any candidate for public office.

Third Parties, it means any natural or legal person who is not part of Coca-Cola FEMSA and who has or intends to have a commercial or contractual relationship with Coca-Cola FEMSA, excluding final consumers and candidates for Employees.

Undue Advantage or Benefit, any benefit or favorable situation improperly sought, obtained or withheld through the action, intervention or omission of a private individual or Public Official.