CODE OF ETHICS

WWW.FEMSA.COM
CONTENTS

Introduction

• Message from our Chairman 5
• Objectives 7
• Scope 8

Our culture 9

• Mission and Vision 10
• Values 11

Our people 12

• Human rights 13
• Diversity, inclusion and non-discrimination 14
• Assault, violence and harassment 15
• Fundamental principles and rights at work 16
• Safety and health at work 17

Our planet 18

• Community 19
• Environment 20

Our resources 21

• Information management 22
• Assets usage 23

Our relation with third parties 24

• Culture of lawfulness 25
• Anti-corruption 26
• Anti-money laundering 27
• Political contributions 27
• Clients 27
• Suppliers 28
• Competitors 29
• Authorities 30
• Marketing 31
• Conflict of interest 32

Our responsibilities 34
• Board of Directors 35
• Individual Directors 35
• Audit Committee and Corporate Practices Committee 36
• Secretary of the Board 36
• Officers 37
• Collaborators 37
• Human Resources 38
• Internal Audit 39

Our Whistleblower system 40
• Whistleblower system 41
• Report Methods 42
• Corrective Measures 43
At FEMSA, we know that in order to fulfill our mission of satisfy and please the beverage consumer through excellence, every day we must put into practice the values we have cultivated. Acting with respect, honesty and integrity, and being governed by the laws and regulations of the countries in which we operate, is an essential part of our corporate culture.

The Code of Ethics is the basis for FEMSA’s business conduct and the foundation of our policies, procedures and guidelines. It has been approved by the Board of Directors, which has also authorized its expedition and its permanent updating, necessary in view of the rapid and profound changes observed in the social environment.
Updating this code allows us to function optimally and transparently, to strengthen confidence in our directors, officers, collaborators, investors, customers, suppliers, competitors, authorities and communities. The Code of Ethics formalizes in a single document our ethical principles, unifies criteria and establishes a common frame of reference that gives us direction to act always in an integral manner. It is a very useful work tool, because it can guide us to make the right decisions in accordance with our values.

I invite everyone who is part of the FEMSA family to regularly read and consult our Code of Ethics. It is also very important that they report any irregularities they observe.

I count on your support, enthusiasm and commitment to continue building success stories and strengthening FEMSA’s reputation.

Kind regards,

José Antonio Fernández Carbajal

Executive Chairman of the Board of FEMSA
OBJECTIVES

1. Define organization directors’ officers’ and collaborators’ responsibilities, as well as the ethical rules towards FEMSA, as to its investors, customers, creditors, suppliers, competitors, authorities, civil society organizations, environment and the community.

2. Establish the rules that are the guides for the ethical behavior of people who work or interact with FEMSA.

3. To publicize the mechanisms to notify through Whistleblower System any breach, behavior or practice that do not comply with the provisions of this code.

4. Establish a framework to apply the corrective measures for those who incur infringements to our Ethics Code and internal regulation.
SCOPE

1 This Code of Ethics was prepared to be observed and complied by members of the Board of Directors, officers and managers (officers) and collaborators for FEMSA companies.

2 This code describes general situations regarding relations with investors, customers, suppliers, authorities, civil society organizations, the environment, the community, and any being interacting with FEMSA companies; taking into consideration those areas with higher risks of potential ethical conflict.

3 As needed, any new issue that arise from the general environment, as well as from various business circumstances, will be included in this code.

4 This document is not, and does not intend to be, exhaustive or include all situations where an ethical conflict might arise. Therefore, situations not foreseen in this Code of Ethics shall be resolved aligned with best practices criteria. In case of doubt, it shall be consulted with the Ethics Committee of the respective Business Unit and ultimately, with the Audit Committee of the Board of Directors.
OUR CULTURE
MISSION AND VISION

Mission
Create economic and social value through business enterprises and institutions.

Vision
- We satisfy the consumer of goods and services with excellence.
- We double the value of our businesses every five years.
- We are diversified in markets that privilege high growth potential.
- We are leaders in the markets where we operate.
- We positively transform the communities where we participate.
- We are the best place to work.
VALUES

At FEMSA, we live our commitment with a sense of belonging and responsibility in our actions through the values that form integral part of the organization and provide the foundation for the development of regulations on which we make decisions and execute actions with value.

The main values at FEMSA are the following:

Respect and integral development of collaborators. We encourage respect and integral development of the collaborators and their family, for them to have access to better opportunities, fostering with it his/her economic, professional, and social growth.

Integrity and austerity. We act in an honest and responsible manner, adhering to the ethical principles, being aware of the impact of our actions and decisions. We are judicious in our behavior and the use of company resources.

Passion for customer service. We are focused on identifying and meeting the needs of our customers, always seeking their preference through innovating solutions.

Social value creation. We contribute to positively transform our communities through the simultaneous creation of economic, social, and environmental value.
OUR PEOPLE
HUMAN RIGHTS

1. We recognize that Human Rights are a set of prerogatives based on human dignity, their effective deliverance is crucial for a person's complete development.

2. We have a loyal, respectful, diligent and honest conduct.

3. We recognize human dignity and we respect personal freedom and privacy.

4. We do not make groundless or ill intended allegations to an innocent person.

5. Those who are involved in political activities of any kind shall not involve FEMSA while performing those activities by clearly stating that they are acting as individuals and not as a representative of FEMSA.
We promote diversity and inclusion always striving to attract diverse talent who will all have the same rights and opportunities.

We do not discriminate against people for any reason including origin, race, marital status, age, opinions, gender, creed, tribal association, union membership, social or economic status, health condition, family situation, pregnancy, sexual identity, disability, illness, nationality, or immigration status.
ASSAULT, VIOLENCE AND HARASSMENT

We are committed to promoting and upholding a work environment in which our collaborators are treated respectfully and with dignity; rejecting, condemning, forbidding, and reporting all forms of assault, violence and harassment or any other activity that threatens the dignity and respect of our collaborators and third parties in and out of our workplace.
FUNDAMENTAL WORK PRINCIPLES AND RIGHTS

1. We respect and protect our personnel who are in our area of responsibility.

2. We do not permit forced labor, and we comply with the applicable laws regarding the hiring of minors.

3. Under no circumstance we fire, suspend, humiliate, threaten, harass, interfere their right of employment or discriminate in any way any person who provides information, helps to provide information, or collaborates in an investigation where breach of the provisions of FEMSA’s Corporate Policies or violations to this code are presumed.
SAFETY AND HEALTH IN THE WORKPLACE

1. We believe that safety and health in the workplace are as important as any other action or purpose of FEMSA.

2. We take actions to guarantee that the following safety and health in the workplace objectives are met:

   A. Provide and maintain workplaces safe and healthy.

   B. Provide and maintain a suitable work environment.

   C. Promote security awareness among our collaborators.
OUR PLANET
COMMUNITY

1. We recognize our commitment to contribute to the development of our communities through our business management that generates economic and social value and is an example of the principles and values that we have always practiced.

2. We establish strategic alliances with civil society organizations and other entities, aimed at promoting the social impact of our community actions.

3. We are actively involved in our community and public issues that allow us to have an impact on local, regional, national and international economic development.
1. We recognize that protecting and defending the environment is our social commitment. This is a responsibility shared by everyone in FEMSA and no one assumes it corresponds to somebody else.

2. We foster the development, and spreading, of environmentally oriented technologies in our operation.

3. We perform the necessary actions to guarantee that in:
   - A. Effective procedures are implemented in response to possible emergencies, to minimize the impact of unpredictable incidents.
   - B. Any significant changes in its business units and their processes to prevent adverse changes in the environment are evaluated.
   - C. Waste, wastewater discharges, air emissions, solid waste management, and confinement not cause adverse environmental impacts.
   - D. Its energy sources are used efficiently and its consumption is monitored.
   - E. The necessary actions are taken to prevent environmental accidents that may be caused by our operations.
OUR

RESOURCES
INFORMATION MANAGEMENT

1. We obtain, secure, treat, protect and safeguard information as a company asset; we do this responsibly, and in accordance to the methods established by the management of the company and to the applicable laws in each country where we operate.

2. Those individuals who, as a result of their responsibilities in FEMSA (such as directors, officers, or collaborators) have access to privileged, and confidential, information, pursuant to the Securities Law Regulations and other related provisions, comply with such regulations and provisions and also with the policy “Transactions with FEMSA’s Securities”; and, they take any necessary actions to prevent the disclosure or leaking of such information to unauthorized people.

3. Directors, Officers, Representatives and Consultants of the Company shall not carry out operations for personal gain or any third party gain, involving any kind of securities issued by FEMSA where price may be influenced by the privileged information they possess, until such information is not made public.

4. Those who carry out activities as teachers, speakers or students, may use only public information of the company in the performance of these activities.

5. We legitimately obtain personal data and manage it responsibly, ethically and in accordance to the privacy laws applicable in each country where we operate.

6. We do not disclose any type of confidential information including that relating to industrial and intellectual secrets, processes, methods, strategies, plans, projects, technical or market data, or information of any other kind.

7. We do not any comment, including in social media or on social networks, about the activities we perform within the company or making any comments that may be detriment the company or its personnel.

8. We are aware of the responsibility shared by all in the protection and preservation of the security of the information that is administered through the company’s technological resources.
ASSETS USAGE

1. We protect and preserve the assets of the company, and we make an efficient use to contribute to the achievement of the business goals.

2. We use FEMSA’s name or resources responsibly, always for the benefit of the company.
OUR RELATION WITH THIRD PARTIES
COMPLIANCE CULTURE

1. We comply with laws, regulations and mandates in the countries where we operate, as well as with this code, policies, rules and procedures set by FEMSA's general management and we prohibit, condemn, punish and report the practices of bribery and extortion practices, setting a law-abiding culture example.

2. We not participate in any activity with the intention of restricting trade and we respect the applicable laws in this regard.

3. We do business with clients or suppliers that share the ethical values and have a solid reputation.

4. We do not carry out activities outside the company that may affect our capacity and willingness to meet the obligations we have in FEMSA.

5. We do not grant loans or finance the Members of our Board of Directors or any Senior Officers.
ANTI-CORRUPTION

1. We do not interact with dishonest people who may damage or attempt to damage to FEMSA.

2. In our activities within and outside the company or in those performed on its behalf, we do not get engage, order, authorize, promise, conspire or induce corruption practices, either directly or through third parties.

3. We follow the laws concerning corrupt practices forbidding bribing government officials in the countries where we do business.
ANTI-MONEY LAUNDERING

We comply with the applicable laws for the prevention of money laundering.

POLITICAL CONTRIBUTIONS

We comply with the requirements set under local laws regarding political contributions held in the countries we operate in.

CLIENTS

1. We serve our clients by giving them an equal and honest treatment in each transaction. We provide the products and services they acquire with the highest quality and in a timely manner, abiding, at all times, with the official regulations and FEMSA’s internal rules.

2. We do not make false or misleading comparisons to similar products or services provided by our competitors.
SUPPLIERS

1. To create the FEMSA suppliers’ portfolio, we take into consideration those suppliers who have proven to share the same ethical values and those who have a solid reputation of integrity and fairness in their treatment.

2. Those who negotiate the acquisition of goods and services required by FEMSA offer to and demand from the suppliers a fair and honest treatment in each transaction, always looking for the best interests of the company.

3. We assure fair participation and impartial selection of suppliers, based on quality, profitability and service criteria.

4. We do not comment with suppliers or people outside the company, the problems or weaknesses we found in another supplier.

5. We consider illegal to ask for or receive personal incentives from suppliers in order to promote their selection.

6. We encourage in our suppliers the best practices regarding human rights, the environment, the community, ethics and values, through our Suppliers Guiding Principles.

7. Every year we request suppliers to sign a letter corroborating their knowledge and compliance with the provisions of the Suppliers Guiding Principles in all of their operations with FEMSA and the observance thereof by the personnel with which they may interact.
COMPETITORS

1. We compete vigorously but always complying with all laws and regulations regarding fair competition in the countries where we operate.

2. We do not engage in any agreement which intends to limit the free interaction in the markets where we operate our business and we do not use inappropriate means to improve our competitive position in such markets.

3. Our personnel who have contact with representatives of our competitors show a professional attitude, complying with the principles and values of the company. We take care of our personal image and the image of FEMSA.

4. In our interactions with our competitors, individually or in forums, and in commercial or professional associations, we avoid discussing topics that could represent risks or contingencies for FEMSA regarding compliance with economic competition laws or regulations.

5. We avoid making comments or statements about our competitors, but when necessary, we do so impartially and objectively.

6. In no event, we attempt to obtain trade secrets or any other confidential information of our competitors through improper means.
We collaborate at all times with the competent authorities for the full exercise of their powers and we act according to law, in defense of the legitimate interests of FEMSA.

We respect the authorities, to whom we offer a polite treatment, and we try to provide an atmosphere of sincerity and trust that may facilitate the discussion of issues and the establishment of agreements.

We comply with the requirements and recommendations of the authorities, trying to collaborate effectively in the fulfillment of their objectives, within the powers granted to them by the laws or regulations.

All Agreements, proceedings and relationships held with the government or its officials on behalf of the company, are conducted in accordance with the applicable laws.
MARKETING

The communication through advertising and marketing of FEMSA is:

A. Legal, decent, honest, truthful and according to the principles of fair competition and good business practice.

B. Prepared with an appropriate sense of social responsibility and based on the principles of honesty and good faith.

C. Verifiable and exempt of elements that might induce an erroneous interpretation of the features of products and services provided.

D. Respectful of moral values, avoiding unethical circumstances that challenge the human dignity and integrity, or using symbols which are culturally offensive to a gender, race, religion, social class or political preference.
CONFLICT OF INTEREST

It arises when personal interests, family, private or interest of any other nature, that affect or could affect the ethical development of directors, officers and collaborators, or be directly or indirectly benefited by such interests.

1. Those who hold an economic interest in the companies which attempt to buy or sell goods or provide services to FEMSA, can carry out such transactions, provided that relevant transactions have to be previously analyzed and approved by the Board of Directors through the Corporate Practices Committee, and minor transactions have to be reviewed and approved by the Legal Department and the Internal Audit Department. For any of those types of transactions, we review the terms and conditions, and we make sure that in the process of negotiation of such transactions the director, officer or collaborator involved does not influence them.

2. The transactions executed by FEMSA with these entities or individuals are competitive in terms of price, quality, and market. In the event that these transactions involve products or services which are not comparable to others on the market, the terms and prices should be reasonable and convenient for the interests of FEMSA.

3. We do not participate in or influence any decision process regarding the engagement of any business or companies owned by any relative or friends.

4. We have no interests or investments that will allow us to have a significant influence on competing businesses.
4. Those who participate in Boards of Directors of different companies other than FEMSA, give notice of our participation to the Legal Department and the Internal Audit.

5. We prevent that any relative work under their supervision, except for those cases authorized in writing by the Corporate Practices Committee of the Board of Directors.

6. Those who perform surveillance, supervision, auditing or control activities over an area under the supervisions of a relative we inform this situation to their supervisor so that they may be substituted from such responsibilities.

7. We report, through institutional means, the cases where we are unable to perform our duties and responsibilities objectively as a result of pressure exercised by any third party using its title, position of authority or influence.

8. We will not intercede or meet any request from superiors, subordinates, peers, relative or friends if by doing this they would damage FEMSA.

9. We do not receive, pay, offer, promise, or authorize on behalf of FEMSA or personally, money, gifts, advantageous conditions, salaries, trips, entertainment, fees or any other form of compensation to influence a business decision or obtain any advantage or benefit of any kind.

10. We only accept or offer promotional gifts, as well as representation expenses, as long as their value is symbolic.

11. When a client or a supplier invites us to travel outside the city or to attend a sporting event or any other entertainment activity, we shall consult with the top management level and the Ethics Committee to evaluate the commercial justification for our attendance.
OUR RESPONSIBILITIES
BOARD OF DIRECTORS

1. Approve the content of the Code of Ethics.

2. Authorize any amendments.

3. Issue the Code of Ethics.

4. Assure, in coordination with the Chief Executive Officer, the disclosure of this code or any of its amendments, including its publication in the appropriate official format and in the company’s website.

INDIVIDUAL DIRECTORS

1. Know the Code of Ethics and sign the Commitment Letter of Compliance annually with its provisions.

2. Inform the Chairman of the Board any aspects of this code whose interpretation or application is not clear enough to provide a solution.

AUDIT COMMITTEE
AND CORPORATE
PRACTICES
COMMITTEE

1. Supervise compliance with the Code of Ethics.

2. Submit to the Board of Directors proposals for modifications for their approval.

SECRETARY OF
THE BOARD

1. Communicate the Ethics Code among the members of the Board of Directors.

2. Ensure that the members of the Board of Directors sign the Commitment Letter of Compliance with the Code of Ethics annually.

OFFICERS

1. Know the Code of Ethics and the Corporate Policy Manual, as well as sign the Commitment Letter of Compliance with the Code of Ethics annually.

2. Ensure that their collaborators know and comply with the Code of Ethics and the Corporate Policies Manual.

3. Support their direct collaborators to clarify questions and to comment and resolve any issues that arise from the interpretation of this code or its enforcement.

4. Report any possible violation of this Code of Ethics.

5. Know and use the Whistleblower System when necessary.

COLLABORATORS


2. Report any possible violation of this Code of Ethics.

3. Know and use the Whistleblower System when necessary.
HUMAN RESOURCES

1. Promote the Code of Ethics among the personnel by delivering a copy to each collaborator, and requesting a receipt acknowledgement.

2. Include in any orientation and training programs the provisions contained in the Code of Ethics.

3. Promote the Whistleblowing System between the personnel.

4. Disseminate the policy Transactions with FEMSA’s Securities”, among the officers and collaborators who have privileged information, by delivering a copy to each and retrieving their acknowledgement.
INTERNAL AUDIT

1. Ensure that the members of the Board of Directors sign the Commitment Letter of Compliance with the Code of Ethics annually.

2. Ensure that the officers sign the Commitment Letter of Compliance with the Code of Ethics and Corporate Policies Manual annually.

3. Evaluate the compliance with the provisions of the Code of Ethics.

4. Inform to the Audit Committee and the Corporate Practices Committee of the Board of Directors about any noncompliance with the Ethics Code.

5. Inform to the Audit Committee and the Secretary of the Board the result of the Commitment Letter of Compliance with the Code of Ethics and Corporate Policies Manual.

6. Follow-up on any actions taken by the management regarding the observed violations of the Ethics Code.
OUR WHISTLEBLOWER SYSTEM
WHISTLEBLOWER SYSTEM

At FEMSA we believe that values are an essential and vital part of the life and culture of the corporation, therefore we take seriously any reports regarding illegal practices or inappropriate conducts observed within our organization.

Through open communication and proper mechanisms implemented in accordance with the provisions set forth in this Code of Ethics, we promote and facilitate the detection of illegal practices and/or inappropriate conduct and we report promptly any violations to this code.

1 The Whistleblower System is a formal mechanism used by the directors, officers and collaborators, as well as by third parties with whom FEMSA has some relationship in the development of its operations.

2 The Whistleblowing System is available all the year on a 24 hour basis, and it is confidentiality managed by a specialized company independent from FEMSA.

3 The claims received by FEMSA officers, from its collaborators and third parties, or gathered through the whistleblowing system or by any other means, will be kept completely confidential.

4 Not reporting any known infringement to this code implies complicity with the infringement and is worthy of a corrective measure.

5 The Whistleblower System is monitored by the Audit Committee of the Board of Directors, made up of independent directors.
# REPORT METHODS

We have the following means to facilitate the reception of complaints:

Internet: [https://www.sel-denuncias.com](https://www.sel-denuncias.com)

E-mail: sel-denuncias@sel-denuncias.com

Telephone:

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<tr>
<td>Venezuela</td>
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CORRECTIVE MEASURES

1. Violations received will be subject of a corrective measure.

2. The severity of a corrective measure will depend on the seriousness of the violation committed.

3. Corrective measures range from a written warning, dismissal or to criminal prosecution by the appropriate authorities, if required.

4. We consider a violation of this code not to apply a corrective measure to any breaches thereof.
CODE OF ETHICS