

Code of Ethics FEMSA

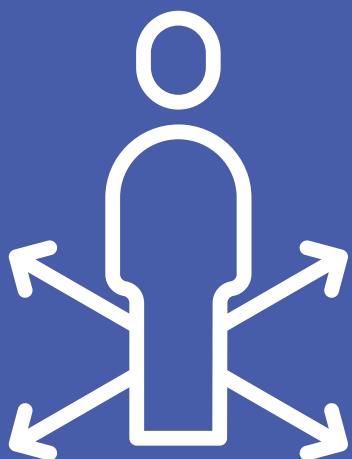


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INTRODUCTION



- MESSAGE FROM OUR CHAIRMAN
- PURPOSE
- SCOPE

MESSAGE FROM OUR CHAIRMAN



At FEMSA we know we must put our cultivated values into practice to generating economic and social value everyday and leave a positive mark on the world. Acting with integrity, humbleness and accountability, 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 FEMSA is the basis of our corporate behavior and the foundation of our policies, procedures, and guidelines. It has been approved by the Board of Directors, which has also authorized its issuance and continuous updating, which is necessary due to changes observed in the business environment.

Updating this code allows us to strengthen trust in our directors, employees, investors, customers, suppliers, authorities, and communities. The FEMSA Code of Ethics formalizes in a single document our ethical principles, unifies criteria, and establishes a common frame of reference that guides us to always act in a comprehensive manner.

It is a useful work tool that helps us make the right decisions in accordance with our values. I invite everyone who is part of the FEMSA family to read and continuously consult our FEMSA Code of Ethics. It is also very important to report any irregularities observed.

I know I can count on your support, enthusiasm, and commitment to continue creating success stories and strengthening FEMSA's reputation.

Kind regards,
José Antonio Fernández Carbalj
Executive Chairman of the Board of Directors of FEMSA

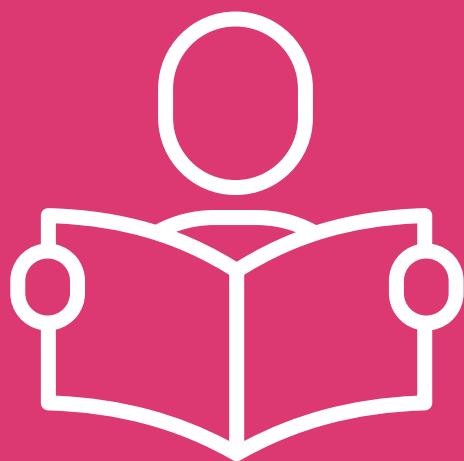
PURPOSE

1. Establishing the fundamental principles and standards that are guidelines for our ethical behavior in our relations with shareholders, customers, suppliers, authorities, civil organizations, environment, community, and everyone who interacts with FEMSA.
2. Define the responsibilities of the company's directors and employees to comply with and enforce the FEMSA Code of Ethics which, together with the other Internal Regulations, form part of our corporate governance system.
3. Divulge the FEMSA Ethics Line, through which any behavior, breach or practice that does not comply with the provisions of the FEMSA Code of Ethics or the other Internal Regulations can be reported.

SCOPE

1. Our FEMSA Code of Ethics applies to members of the Board of Directors, employees and all persons acting on behalf of FEMSA and its subsidiaries.
2. This FEMSA Code of Ethics is not, and does not pretend to be exhaustive. Therefore, unforeseen situations will be resolved in accordance with our internal guidelines, best management and corporate governance practices. This Code is complemented by the rest of our Internal Guidelines, including, but not limited to, our Corporate Policies on Human and Labor Rights, Occupational Health and Safety, Environment, Sustainability, Community Commitment and Anti-Corruption, which can be consulted on our official website.
3. Additional matters arising from diverse situations of our business and the dynamics of the environment will be incorporated as necessary.

FEMSA CULTURE



- FEMSA CULTURE

FEMSA CULTURE

The evolution that we have recently experienced at FEMSA, since the announcement and implementation of our FEMSA Forward strategy, has led us to make relevant changes in our business strategy, and at the same time, evolve our Organizational Culture, which is now made up of six elements.



WHO WE ARE

We are a group of companies with more than 130 years, evolving and shaping a continuous and enduring positive legacy in society.

Our leading businesses in retail, beverages and digital services move forward towards the future, driven by our winning spirit and commitment to excellence, with a deep focus on integrity and placing people at the heart of everything we do



OUR BELIEF

We believe that by generating economic and social value every day, we leave a positive footprint on the world.



OUR VISION

With our companies together, we aspire to be part of everyone's life at every opportunity, wherever we are, being the best in each of our businesses.



OUR PURPOSE

Our purpose is to enhance people's lives, transforming the everyday into well-being and growth.

- *We contribute to people's well-being, staying close and available, providing solutions and experiences that allow them to enjoy each day to the fullest.*

- *We foster growth, since our actions contribute to the social and economic development of the communities we take part in, our collaborators, and our company, sustaining our commitment to planet care.*



OUR STRATEGY

FEMSA Forward: A focused leader in Retail and Beverages, leveraged and connected by a Digital customer-centric ecosystem to maximize value creation. Always guided by our strategic priorities.

OUR PRINCIPLES

Our 7 principles are our guide of behaviors and actions, allowing us to grow and adapt to the changes in the world while keeping our essence.

Living our values

We act with integrity, transparency, humbleness and accountability, being ambassadors of our culture.

Playing to win

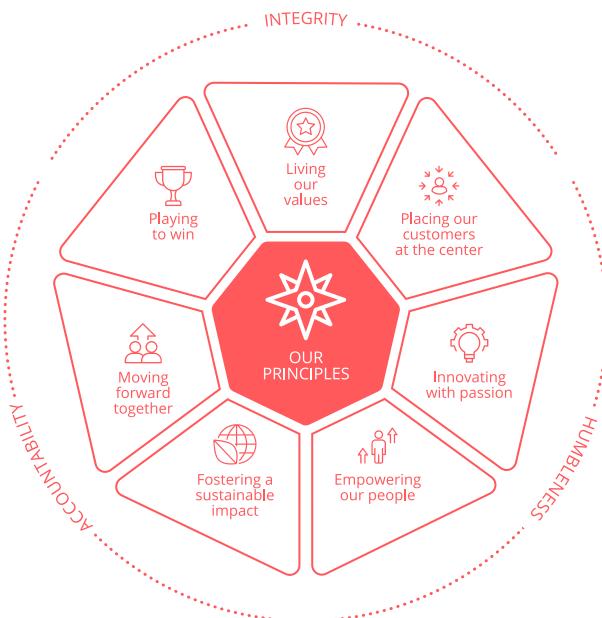
We act like a founder, we choose to win, creating opportunities with a focus on generating long-term value.

Moving forward together

We collaborate effectively with diverse people and audiences, achieving results that exceed expectations.

Placing our customer at the center

We turn the daily needs of our customers and consumers into challenges that motivate us to deliver exceptional solutions that build trust.



Innovating with passion

We develop cutting-edge ideas to strengthen our present through digital solutions that anticipate the future in an agile way.

Empowering our people

We are committed to the well-being and professional development of our talent, strengthening their abilities to face challenges successfully and inspiring by example.

Fostering a sustainable impact

We are committed to create inclusive and sustainable solutions that generate a positive social impact in our communities and our planet, keeping a global perspective in our decision-making process.

Our values are the heart of our culture; they reflect our legacy and our way of being leaders:

Integrity

We do the right thing in any circumstance, taking care of the impact of our actions.

Humbleness

We recognize the value of each person, we accept our limitations, willing to learn and grow.

Accountability

We work to keep our promises and we take responsibility for what we do.

Everyone that is part of FEMSA must be an ambassador and example of living our Organizational Culture.

OUR PEOPLE



- **HUMAN RIGHTS**
 - Respect for human dignity
 - Justice, equity, diversity and inclusion
- **FUNDAMENTAL PRINCIPLES
AND RIGHTS AT WORK**
 - Safety and health at work

HUMAN RIGHTS

At FEMSA, we acknowledge that Human Rights are the set of principles based on human dignity, which are essential to the holistic development of the person.

RESPECT FOR HUMAN DIGNITY

JUSTICE, EQUITY, DIVERSITY AND INCLUSION

1. We display loyal, respectful, diligent, and honest behavior.
2. We respect the dignity of people, their freedom, and their privacy.
3. We do not allow verbal, visual, or physical behavior that threatens dignity and respect.
4. We are committed to promoting and maintaining a work environment in which all forms of harassment, abuse, violence and bullying or any other conduct threatens the dignity and respect of our employees are strictly prohibited and sanctioned.
5. We are committed to promoting equitable and fair access to opportunities for the integration, growth and development of our employees adding value based on their unique characteristics and diversities.
6. We do not discriminate against anyone by making any distinction, exclusion, restriction, or preference that is not objective, rational nor proportional, and which has as a purpose the obstruction, restriction, reduction, or nullification of the acknowledge and exercise of the human rights and freedom for any reason, including origin, race, marital status, age, opinions, gender, creed, tribe, association or affiliation to a union, ethnicity, social or economic class, pregnancy, gender identity, sexual orientation, health condition, disability, or nationality.

FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

At FEMSA, we are committed to growth as a high performing organization where talent, culture and leadership are the main drivers of our people's development and for the fulfillment of our strategic objectives. Therefore, we seek to promote the professional development of our employees and provide them with the necessary training and resources to foster their safety and success at work.

1. We value, respect, and protect the people who work at FEMSA.
2. We do not allow forced labor or human trafficking. We prohibit child labor and actively support its eradication, and we also ensure compliance with all relevant laws regarding the employment of minors.
3. We report cases in which we cannot fulfill our responsibilities objectively due to third party pressure who use their position, authority, or influence at FEMSA.



SAFETY AND HEALTH AT WORK

4. We believe that the physical integrity, safety, and health of our employees in the workplace are as important as any other function and objective of FEMSA.
5. We take the necessary actions to ensure that the following occupational safety and health objectives are met:
 - a) Promote and preserve safe and healthy workplaces and conditions.
 - b) Provide and maintain a suitable work environment.
 - c) Develop a safety culture among the employees.



OUR PLANET



- COMMITMENT TO THE COMMUNITY
- ENVIRONMENT

COMMITMENT TO THE COMMUNITY

We acknowledge our commitment to contribute to the development of communities through our business management, which is a display of the principles and values that we have practiced since our beginning.



1. We establish strategic alliances with civil organizations and other entities that aim to boost the social impact of our community actions.
2. We actively engage in citizenship by participating in community and public affairs, and encourage our employees to participate as well, aiming to make a positive impact on the human, environmental and economic development in the communities where we operate.



ENVIRONMENT

We manage the risk and opportunities associated with the environmental impact of energy and water use, and waste management throughout the value chain of all our operations.

1. We acknowledge, as part of our commitment to generate social value, the protection and conservation of the environment.
2. We promote the development, diffusion and use of environmentally friendly technologies in our operations.





3. At FEMSA, we take the necessary actions to ensure that our operational growth is committed to minimizing our environmental impact, which is why we ensure:

- a) That effective procedures are implemented to respond and adapt to possible environmental risks.
- b) Significant changes in operating units and processes are evaluated in advance.
- c) Necessary measures are taken to prevent environmental accidents that may be caused by our operations.
- d) To reduce the generation of drainage discharges and air emissions, and soil contamination.
- e) Promote the use of clean energy sources, make efficient use of energy and monitor consumption.
- f) Promote the efficient use of water, as well as activities that encourage its care and conservation.
- g) Promote the protection of biodiversity and ecosystems.
- h) Implement programs for the reduction, reuse and recycling of waste from our operations, as well as waste related to our products and services.

OUR RESOURCES



- **FEMSA USE OF ASSETS**
- **INFORMATION MANAGEMENT**
 - Privileged and confidential information
 - Accounting and financial records
 - Intellectual property
 - Personal data
 - Information security

FEMSA USE OF ASSETS

We have the responsibility to protect and properly use FEMSA's assets, as well as to seek the best use of assigned resources.



1. We protect and preserve FEMSA's assets and those that we use on behalf of FEMSA.
2. We use FEMSA's assets efficiently to contribute to the achievement of its objectives.
3. We use FEMSA's name and resources responsibly, always looking out for the sole benefit of the company.

INFORMATION MANAGEMENT

Through the systems authorized by the administration, we protect and preserve all the information that we generate, obtain, and treat, whether it is ours or of third parties, as a company asset responsibly, ethically, and in accordance with the applicable laws to our operation.

PRIVILEGED AND CONFIDENTIAL INFORMATION



1. In compliance with the laws that regulate the securities markets where FEMSA is listed, we protect, do not disclose, and avoid the leakage of, privileged and/or confidential information to unauthorized persons.
2. We do not carry out transactions for our own benefit or that of third parties with any kind of securities issued by FEMSA, whose price could be influenced by the privileged information that we possess.
3. Those who perform activities as lecturers, exhibitors or students only use FEMSA's public information to perform their activities.
4. We do not make any comments, including in family and friend environments or on social networks, about activities that we carry out at FEMSA which could be harmful to the company or to those who form part of it.
5. FEMSA's official spokespersons are the only people authorized to give information about the company to the media.



ACCOUNTING AND FINANCIAL RECORDS

6. We record accounting and financial information in a comprehensive, proper, and timely manner, in accordance with current accounting regulations and as established by applicable laws to our operation and securities regulators, ensuring the truthfulness of the indicators we are responsible for.

INTELLECTUAL PROPERTY

7. We do not disclose any type of confidential information, including that related to trade secrets, processes, methods, strategies, plans, projects, technical or market data or any other type of information. We maintain the confidentiality of such information even when our working relationship with FEMSA has concluded, and we do as well with the confidential information of the companies with whom we have previously worked.

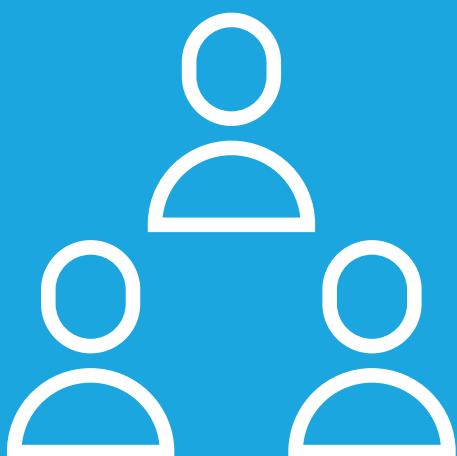
PERSONAL DATA

8. We value and respect the data of our employees, customers, candidates and business partners. Therefore, we collect and process personal data responsibly and with integrity, ensuring its security and confidentiality, and in accordance with legal principles, in compliance with our internal guidelines, laws and other legal provisions applicable to our operation.
9. We establish and maintain strong security measures to prevent unauthorized use, access, modification or disclosure of personal data.

INFORMATION SECURITY

10. We are aware of the responsibility shared by all in the protection and preservation of the security of the information that we manage and the technologies and initiatives we implement, involving the Information Security area from their design.
11. We responsibly use and protect access to accounts and passwords assigned to technological resources.

OUR RELATIONSHIP WITH THIRD PARTIES



- CLIENTS
- SUPPLIERS
- COMPETITION
- GOVERNMENT AND AUTHORITIES
- MARKETING

CLIENTS

At FEMSA, we seek to improve the value proposition and experience of our clients.



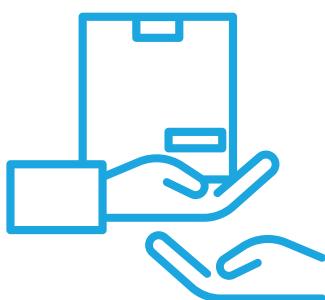
1. We serve our clients by providing them with fair and honest treatment in each transaction, adhering to the FEMSA principles and values, providing products and services with the highest quality and punctuality.
2. We do not make false comparisons with equivalent products or services offered by competitors.
3. We understand the needs of our customers and we are committed to innovate our processes and products to satisfy them.
4. We disclose through our official communication channels, our Code of Ethics to our value chain.



SUPPLIERS

We contribute to the improvement of the labor, social and environmental performance of our suppliers and we look for those who work based on policies, principles, and responsible business practices.

1. Our portfolio of suppliers only includes those who share our ethics and Values in accordance with this Code of Ethics and the Supplier Guiding Principles. We recognize that corporate ethics is a shared responsibility between FEMSA and its suppliers, and we expect them to implement, in proportion to their size and capabilities, practices aligned with these principles in their operations and business conduct.
2. Those of us who negotiate the acquisition of the goods and services that FEMSA requires, offer and demand professional treatment from our suppliers in each transaction, always seeking the best interests of the company.
3. We ensure the equitable participation of suppliers in the selection processes based on quality, profitability and service criteria, and considering, among others, the ethical, environmental and information security standards established by FEMSA. We require our suppliers to know and comply with the Supplier Guiding Principles, as well as to respect human rights in accordance with international principles and standards, applying them consistently in their operations and business relationships.
4. We consider as an illicit conduct to request or receive any kind of incentive from suppliers for their selection or promotion, which does not benefit the company.



COMPETITION

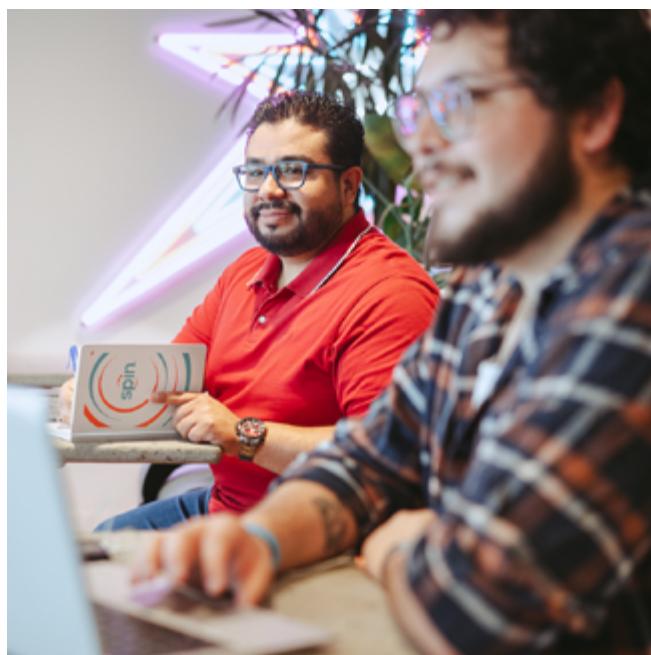
We do business fairly, based on our ethical principles and in compliance with competition laws applicable to our operation.



1. Our business relationships are based on legality, ethics and respect for free competition.
2. We refrain from entering into any formal or informal agreement with customers, suppliers or competitors that have the purpose or effect of restricting, distorting or impeding the free functioning of the market in which we operate.
3. We act with integrity in all our interactions with customers, suppliers, and competitors, showing a professional attitude, complying with FEMSA's principles and values, and with our Internal Guidelines, taking care of our personal image and that of FEMSA.
4. When interacting with competitors, either individually or through forums, chambers, business or professional associations, we do not comment on issues that could represent a risk or possible liabilities for FEMSA in terms of market competition.

GOVERNMENT AND AUTHORITIES

At FEMSA, our Values are the basis of our relationships with the government and the authorities of the countries where we operate, and we provide them with an open and respectful treatment.



1. We comply with the laws, regulations and other applicable guidelines established by the governments of the countries in which we operate.
2. We collaborate at all times with government and competent authorities so that they can fully exercise their powers, and we act in accordance with the law in defense of the legitimate interests of FEMSA.
3. We respect the government and authorities, to whom we offer polite treatment, and we seek an atmosphere of openness and trust that facilitates the discussion of issues and the establishment of agreements.
4. We attend to the requirements and observations of governments and authorities in the exercise of their powers granted by applicable laws or regulations, seeking to collaborate effectively and politely in the fulfillment of their mission.
5. The relationships between FEMSA and government agencies or officials are conducted in compliance with applicable laws to our operation and this FEMSA Code of Ethics.
6. Prior to having contact with the government and/or authorities on behalf of FEMSA, we verify, with the Institutional Relations areas of our Business Unit, that said interaction is within our powers.

MARKETING

Communication through FEMSA's advertising and marketing is:



1. Legal, decent, honest, truthful and in accordance with principles of fair competition and good business practices.
2. Prepared with a sense of social responsibility and based on principles of honesty and good faith.
3. Verifiable and free of elements that could lead to a misinterpretation of the characteristics of the products and services offered.
4. Respectful of moral values, avoiding unethical circumstances that violate integrity and human dignity or use culturally offensive symbols.



CULTURE OF LAWFULNESS



- REGULATORY COMPLIANCE
- ANTI-CORRUPTION
 - Anti-bribery
- ANTI-MONEY LAUNDERING
- POLITICAL CONTRIBUTIONS
- CONFLICT OF INTEREST
 - Financial Interests
 - Family and others
 - Gifts, hospitalities and entertainment
 - Other activities

REGULATORY COMPLIANCE

At FEMSA, lawfulness is part of our culture and we work to ensure our employees practice this notion. We firmly believe that our world requires organizations and individuals committed to our society.



1. We comply with the laws, regulations, and codes applicable to our operation, as well as with this FEMSA Code of Ethics, and other Internal Regulations established by the FEMSA Administration.



ANTI-CORRUPTION

We conduct business practices in accordance with the law, in an honest and ethical manner, with zero tolerance for bribery, rejecting, denouncing, and fighting any act of corruption and extortion.

- 1.** We act with integrity in our activities inside and outside FEMSA, and we reject any form of corruption, whether it is carried out directly or through a third party, therefore;
 - we do not order, authorize, or promise to engage in acts of corruption,
 - we do not induce others to engage in acts of corruption, and
 - we do not participate in schemes or agreements involving acts of corruption.
- 2.** We comply with the anti-corruption laws and regulations applicable to our operation, including those that prohibit bribery of public officials and among private individuals.

ANTI-BRIBERY

- 3.** We strictly reject any form of bribery whether directed at government officials or any other individual or entity.



ANTI-MONEY LAUNDERING

1. We comply with all applicable laws on the prevention of money laundering and the financing of terrorism, and we promote its knowledge and compliance among our employees.
2. We develop and implement processes and mechanisms to identify, evaluate and mitigate risk arising from illicit activities, including those related to money laundering and other emerging threats that may affect our business and the security and confidence in the economic sectors in which we operate.



POLITICAL CONTRIBUTIONS

1. Those of us who participate in political activities, in any jurisdiction, do not involve FEMSA, and we clearly establish that we act in a personal capacity and not on behalf of the company.
2. We comply with the requirements established by local laws regarding political contributions in the countries in which we operate and with the Internal Regulations established by the FEMSA Administration.

CONFLICT OF INTEREST

At FEMSA, we carry out all our activities with integrity and professional ethics, avoiding that the interest of our own or those of third parties, influence or affect our judgement, objectivity, loyalty, decision-making, duties and/or responsibilities as FEMSA's employees.

FINANCIAL INTERESTS

1. Those who have or intend to have a commercial or business relationship with, or an investment in companies or other business that have or seek to have a commercial or business relationship with FEMSA, shall only have these relationships or investments, once they have been previously analyzed and approved in accordance with the Internal Regulations established by FEMSA.
2. We have no interests or investments that allow us to have an influence on, or participate in commercial activities of, competing businesses.



FAMILY AND OTHERS

- 3.** We do not participate or directly or indirectly influence the requests, negotiations, hiring and decision processes, respect to any customer, supplier, or business partner with whom we have or in whom we have:
 - A family relationship, or
 - A family member, as partner, investor, or agent, or
 - A relationship (including friendship) which is likely to create us a conflict with the interest of FEMSA, or any personal benefits (including if such relationship is with a partner, investor, agent, or employee of such customer, supplier, or business partner).
- 4.** We avoid having family members reporting to us, except in cases authorized in accordance with our Internal Regulations.
- 5.** Those of us who perform monitoring, supervision, auditing, or control over the activities carried out by a relative, must report this situation to a superior so that this duty can be replaced, and in the case of the Chief Executive Officer of FEMSA, he or she must inform it to the Board of Directors.
- 6.** We do not intervene or satisfy the requirements of superiors, subordinates, co-workers, family, or friends, if it may harm FEMSA.

GIFTS, HOSPITALITIES AND ENTERTAINMENT

- 7.** We do not receive, give, pay, offer, promise, or authorize, on behalf of FEMSA or on a personal basis, in a direct or indirect way, money, gifts, advantageous conditions, salaries, travel, commissions or anything else of value to obtain any undue advantage or benefit of any kind.
- 8.** We do not give or offer gifts to government officials.
- 9.** We only accept, give, or offer gifts of a promotional nature, occasional and of symbolic value.
- 10.** We only provide hospitalities in accordance with the provisions of our Internal Guidelines that regulate gifts, entertainment and invitations to entertainment events, as well as applicable legal provisions.
- 11.** When a client or a supplier offers an invitation, which implies a trip outside the city or to attend a sporting event or any other entertainment, we shall comply with this Code of Ethics and other Internal Regulations, and must obtain prior necessary approval to attend such invitation.

OTHER ACTIVITIES

- 12.** We do not carry out any external activity that could affect our capacity and availability towards our obligations with FEMSA.

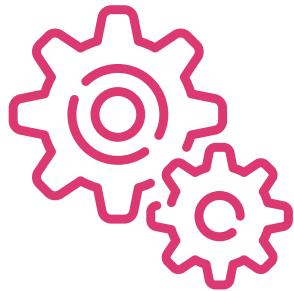
OUR RESPONSABILITIES



- BOARD OF DIRECTORS
- DIRECTORS
- AUDIT COMMITTEE AND
CORPORATE PRACTICES AND
NOMINATIONS COMMITTEE
- SECRETARY OF THE BOARD
- FEMSA REGULATIONS AND
CORPORATE GOVERNANCE
- ETHICS COMMITTEES
- CEO's BUSINESS DIVISIONS
- EMPLOYEES
- HUMAN RESOURCES
- INTERNAL AUDIT

BOARD OF DIRECTORS

1. Approve the content and adjustments to the FEMSA Code of Ethics, as well as its issuance.
2. Ensure, in coordination with General Management, the diffusion of the FEMSA Code of Ethics.



DIRECTORS

1. Know the FEMSA Code of Ethics and annually sign the Commitment Letter to comply with its provisions.
2. Inform the Chairman of the Board of Directors of any part of this FEMSA Code of Ethics which considers that its interpretation or applicability is not clear enough, to find a proper solution.
3. Report any possible violation of the FEMSA Code of Ethics.

AUDIT COMMITTEE AND CORPORATE PRACTICES AND NOMINATIONS COMMITTEE

1. Supervise the compliance with the FEMSA Code of Ethics.
2. Summit proposals to modify the FEMSA Code of Ethics for approval of the Board of Directors.



SECRETARY OF THE BOARD

1. Disseminate the FEMSA Code of Ethics among the members of the Board of Directors.
2. Ensure that the members of the Board of Directors annually sign the Commitment Letter to comply with the FEMSA Code of Ethics.



FEMSA REGULATIONS AND CORPORATE GOVERNANCE

1. Monitor diverse business situations, and business units requirements as well as the dynamics of the environment to propose, and, where appropriate, modify the content of FEMSA Code of Ethics and other Corporate Regulations.
2. Ensure that all directors and managers annually sign the Commitment Letter to comply with FEMSA Code of Ethics and other Corporate Regulations.
3. Address doubts regarding the interpretation and content of the FEMSA's Code of Ethics and other Corporate Regulations.
4. Monitor the compliance with FEMSA's Code of Ethics and other Corporate Regulations.

ETHICS COMMITTEES



1. Ensure that the Business Units comply with the FEMSA Code of Ethics to promote the FEMSA Culture.
2. Ensure dissemination, understanding and use of the FEMSA Code of Ethics and the FEMSA Ethics Line.
3. Provide guidance for reports received through FEMSA Ethics Line and respond to any doubts and concerns related to possible violations of FEMSA's Code of Ethics and other Internal Regulations.
4. Promote and ensure that the investigations of the reports received through FEMSA Ethics Line are conducted objectively, impartially, confidentially and without retaliation.
5. Discuss and determine the corrective measures that are applicable, in accordance with FEMSA Sanctions Guidelines, for acts or omissions that violate the Code of Ethics and other Internal Regulations, ensuring zero tolerance for retaliation.

CEO'S OF THE BUSINESS DIVISIONS

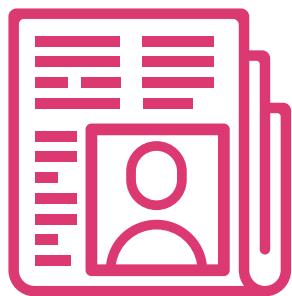
1. Disseminate FEMSA's Code of Ethics and other Internal Regulations among employees.
2. Ensure that the business divisions comply with the established in FEMSA's Code of Ethics and other Internal Regulations.

EMPLOYEES

1. Know and comply with the FEMSA Code of Ethics and other Internal Regulations.
2. Report any violation and/or risk of violation of the FEMSA Code of Ethics and other Internal Regulations.
3. Know and use the FEMSA Ethics Line, if necessary.
4. Sign in accordance with the periodicity indicated by the company, the Commitment Letter to comply with FEMSA's Code of Ethics and other Internal Regulations.
5. Immediately report any real, potential, or apparent Conflict of Interest



HUMAN RESOURCES



1. Disseminate among employees the FEMSA Code of Ethics and other Internal Regulations, including the procedure to report through FEMSA's Ethics Line and the actualizations of such documents.
2. Include the topics contained in FEMSA's Code of Ethics and other Internal Regulations in induction and training programs.
3. Integrate into the organization employees who share our ethics and Values in accordance with this FEMSA Code of Ethics.

INTERNAL AUDIT

1. Evaluate the compliance with the provisions contained in the FEMSA Code of Ethics.
2. Inform to the Audit Committee and the Corporate Practices and Nominations Committee of the Board of Directors of any breach of the FEMSA Code of Ethics.
3. Follow up on the measures adopted by the management for violations reported through the FEMSA Ethics Line.



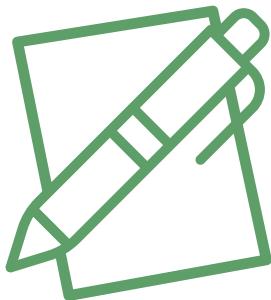
ETHICAL COMPLIANCE SYSTEM



- REPORTS
- FEMSA ETHICS LINE
- QUESTIONS AND CONCERN
- CORRECTIVE MEASURES

REPORTS

At FEMSA, our Values are an essential and indispensable part of our life and culture. Therefore, we take any report about illegal practices or inappropriate behaviors detected in our company seriously.



1. We keep as confidential all reports received by FEMSA executives from their employees and third parties, or those collected through the FEMSA Ethics Line or through any other means, except if there is an obligation in the applicable law, to disclose part or the entire report and its corresponding investigation.
2. We do not tolerate reports made baselessly and in bad faith.
3. To determine whether any reported act or omission violates the Code of Ethics and other FEMSA's Internal Regulations, we conduct a confidential, impartial and well-founded investigation, in line with our guidelines and applying the appropriate preventive and/or corrective measures.
4. We prohibit any type of retaliation against people who report and/or cooperate in good faith in investigations that presume the breach of any provision established in FEMSA's Code of Ethics or other Internal Regulations.
5. Failure to report any known violation of the FEMSA Code of Ethics and/or other Internal Regulations, implies being jointly responsible and deserving of a corrective measure.
6. We attend and document all reports received in the FEMSA Ethics Line.



FEMSA ETHICS LINE

We promote a culture of integrity and transparency in order to facilitate the timely detection of illegal practices and inappropriate behaviors.

We have an Ethics Line, a communication channel independent from the company's management, available to report conduct or practices that do not comply with our Internal Guidelines, current legislation or the regulatory framework applicable in the countries where we operate.

1. The FEMSA Ethics Line is a formal mechanism used by directors and employees, as well as by third parties with which FEMSA has some relationship in the development of its operations, for reporting any breach of the FEMSA Code of Ethics and other Internal Regulations.
2. The FEMSA Ethics Line is available 24 hours a day, every day of the year and is managed confidentially by a specialized company outside of FEMSA.
3. The FEMSA Ethics Line is supervised by the Audit Committee of the FEMSA Board of Directors, composed of independent directors.
4. Any breach of FEMSA's Code of Ethics and other Internal Regulations, or suspicion of non-compliance, must be reported. In addition to the FEMSA Ethics Line, Employees have other instances to which they can turn, in the following order: (i) direct manager, (ii) second-level manager, (iii) Human Resources, (iv) Ethics System, and (v) Ethics Committee.



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

Internet:

CAFFENIO, DOÑA TOTA, FARMACIAS YZA, FEMSA SERVICIOS, O'SABOR, OXXO, OXXO GAS, SPIN, SPIN BY OXXO, SUPER BARA, XPERTAL	lineaeticafemsa.ethicspoint.com
CESFAR	cesfar.sistemaetico.ethicspoint.com
COCA-COLA FEMSA	lineaeticadilo.ethicspoint.com
CORPORACIÓN GPF	gpf.sistemaetico.ethicspoint.com
CRUZ VERDE	cruzverde.sistemaetico.ethicspoint.com
FARMACIAS CRUZ VERDE	farmaciascruzverde.sistemaetico.ethicspoint.com
FEMSA SALUD	femsasalud.sistemaetico.ethicspoint.com
FL COLOMBIA	lineaeticaflcolombia.ethicspoint.com
INTERCARRY	intercarry.sistemaetico.ethicspoint.com
INTERCOB	intercob.sistemaetico.ethicspoint.com
MAICAO	maicao.sistemaetico.ethicspoint.com
MEDICARTE	medicarte.sistemaetico.ethicspoint.com
MILAB	milab.sistemaetico.ethicspoint.com
MUNNICH PHARMA MEDICAL	munnichpharma.sistemaetico.ethicspoint.com
SATILIS	satilis.sistemaetico.ethicspoint.com
SOCOFAR	socofar.sistemaetico.ethicspoint.com
SOLVENTA	solventa.sistemaetico.ethicspoint.com
SOLVENTA CRÉDITOS	solventacreditos.sistemaetico.ethicspoint.com
VALORA	valora.integrityline.org

Telephone:

COUNTRY	BUSINESS	PHONE NUMBER
ARGENTINA		0 800 345 1571
BRAZIL		0 800 721 8529
CHILE	OXOXO	800 914 451
	CESFAR	800 914 458
	FARMACIAS CRUZ VERDE	800 914 438
	FEMSA SALUD	800 914 029
	INTERCARRY	800 914 439
	INTERCOB	800 914 445
	MAICAO	800 914 448
	MILAB	800 914 442
	MUNNICH PHARMA MEDICAL	800 914 625
	SATILIS	800 914 419
	SOLVENTA	800 914 443
	SOLVENTA TARJETAS	800 914 427

COUNTRY	BUSINESS	COUNTRY CODE (DIAL BEFORE THE PHONE NUMBER)	PHONE NUMBER
COLOMBIA	COCA-COLA FEMSA		01 800 518 9439
	OXOXO		
	DROGUERÍAS CRUZ VERDE		01 800 518 5330
	FL COLOMBIA		01 800 519 0934
	MEDICARTE		01 800 518 9936
COSTA RICA			0 800 032 0075
ECUADOR	CORPORACIÓN GPF		096 316 1201
UNITED STATES OF AMERICA	SOUTHWEST CONVENIENCE STORE		1 844 951 5233
GUATEMALA			2277 2618
MEXICO			800 681 8061
NICARAGUA		1 800 0164 o 1 800 0174	833 573 1744
PANAMA			835 5559
PERU			0800 78184
URUGUAY	COCA-COLA FEMSA SOCOFAR		000 413 598 3945
VENEZUELA		Español 0 800 552 6288 Inglés 0 800 225 5288	833 573 1744

QUESTIONS AND CONCERNS



We promote a culture of prevention, oversight, detection and feedback, so we receive questions and concerns regarding compliance with our Code of Ethics and other Internal Regulations through the FEMSA Ethics Line and the e-mail lineaeticafemsa@femsa.com.

CORRECTIVE MEASURES



1. Breaches of the FEMSA Code of Ethics and FEMSA other Internal Regulations will be subject to corrective and/or preventive measures as appropriate.
2. The severity of the corrective measures will depend on the severity of the faults committed and their recurrence.
3. Corrective measures range from written reprimands, dismissals to criminal prosecution before the competent authorities, and the exercise of any other corresponding legal action, in accordance with FEMSA Sanction Guidelines.
4. We consider the failure to apply corrective measures to violations to itself be a violation.
5. We respect the rights of the people involved in the reports received and validate and document all available evidence before taking any corrective action.

REFERENCES

ILO Conventions

[normlex.ilo.org/dyn/nrmlx_en/
f?p=1000:12000:0::NO:](http://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:12000:0::NO:)

UN Universal Declaration of Human Rights

un.org/en/about-us/universal-declaration-of-human-rights

UN Global Compact

unglobalcompact.org

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html

Suppliers Guiding Principles

femsa.com/en/press-room/documents/suppliers-guiding-principles

Corporate Policies

Human and Labor Rights Corporate Policy

Occupational Health and Safety Corporate Policy

Environment Corporate Policy

Sustainability Corporate Policy

Community Commitment Corporate Policy

Anti-corruption Corporate Policy

femsa.com/en/press-room/documents/corporate-policies



CODE OF ETHICS FEMSA
Monterrey, Nuevo León, México
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