

# INTEGRITY AND ETHICS

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At El Puerto we have a Code of Conduct and Integrity aligned with our vision, mission and values, which complements our current Code of Ethics.

These documents underscore the culture of compliance at El Puerto and establish the way we do business and conduct ourselves with customers, employees and commercial partners.

Our Code of Conduct and Integrity provides guidelines on the habitual conduct of each board member, officer or employee of El Puerto.

Strict observance of all legal ordinances is one of the pillars by which we respect the law and promote a culture of integrity.

## Organizational and Procedure Manual

**El Puerto has an Organizational Manual of Policies and Procedures, whose objectives are:**

- To define the duties, obligations and responsibilities of each administrative body and the employees belonging to it.
- To serve as an institutional system for employees which shows the structure of the organization and its corresponding chains of command.
- To maintain clarity and transparency, supporting the company in efficiently and properly meeting its goals.
- To prevent and combat corruption.

# Codes of Ethics and Conduct and Integrity

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El Puerto's Code of Ethics is based on corporate principles and standards such as teamwork, innovation, integrity and productivity.

Additionally, the Code of Conduct and Integrity describes the commitment necessary to comply with and enforce compliance of the laws and regulations the apply to all of us at El Puerto.

It is our intent to communicate the essential elements of our corporate culture to board members, officers, employees, suppliers, customers, investors and everyone else who makes up El Puerto, through key behaviors that very one of us should adopt.

## Control, Oversight and Audit Systems

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**We guarantee integrity through:**

- The Audit and Corporate Practices Committee;
- Internal Audit;
- Internal Controls;
- Annual reviews by independent auditors.

**In the same vein, the Compliance Office is responsible for proposing controls and assisting and monitoring integrity standards.**

# Línea Ética

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We have a whistleblower system that guarantees confidentiality to the extent permitted by law. Under this system, any person who has relationship with El Puerto, including employees as well as outside parties, may report violations of any of the codes, laws or regulations using this hotline.

**Reports may be filed through “Línea Ética” using the following channels:**



**Webpage: [www.lineaetica.org.mx](http://www.lineaetica.org.mx)**



**E-mail: [contactanos@lineaetica.org.mx](mailto:contactanos@lineaetica.org.mx)**



**Phone: 01 800 633 8133**



**WhatsApp: 55 3488 8895**

This system prohibits any reprisal against reporting parties.

## Training and Education Systems and Processes

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Training programs are held each year with the support of Human Resources staff, in order to reinforce the contents of El Puerto's Codes of Integrity, Conduct and Ethics.

We have an internal website providing official information by which we can build awareness, promote and communicate key policies to our personnel. The website is monitored and administered by the Compliance Office.

# Human Resources Policy

Our processes for recruiting, selecting and evaluating our employees are developed to ensure honesty, integrity, respect and equal opportunities. For this reason they prohibit any discrimination on the basis of ethnicity, gender, age, disability, social condition, health conditions, religion, sexual preference, marital status or any other form of discrimination that infringes on human dignity.

We conduct interviews and evaluations to ensure that each candidate has the qualifications required for the job.

We place special emphasis on processes for reducing the risk of hiring people with a tendency to commit acts of corruption, and we require medical examinations in



## Mechanisms for Transparency and Disclosure of Interests

El Puerto is listed on the Mexican Stock Exchange and complies with all disclosure and reporting requirements relating to the Securities Market Act. We publish quarterly and annual financial information and comply with requirements on disclosure of conflicts of interest by board members and/or officers of the company.

We conduct interviews and evaluations to ensure that each candidate has the qualifications required for the job.

# Social Responsibility

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El Puerto has a social commitment by which it contributes to sustainable human development through the generation of social, economic and environmental value. It carries out programs and actions to promote environmental improvement, complying with all applicable laws, in order to engage positively, transparently and proactively with stakeholders and thus to build positive relations with society at large. To this end we publish complete, timely and accurate information on matters that go beyond the strictly financial. We have a long-term vision that is supported by our history.

## Policy on Personal Data

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We have policies in place to regulate, control and monitor the lawful handling of personal data under our responsibility, in order to comply with the Federal Data Protection Law, its regulations and any other applicable standards, which give people control over the use of their own data. This includes personal data on employees, suppliers and customers.

If any person wishes to exercise any of the rights consigned in that law, they may use the contact channels mentioned in our various privacy notices.



# Compliance Office

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If you have any questions, comments or require advice regarding the documents described here, or about any of the laws and regulations governing us, you may contact the Compliance Office by the following channels:

**Contact: José Octavio Zúñiga Fayad**



**e-mail: [jozunigaf@liverpool.com.mx](mailto:jozunigaf@liverpool.com.mx)**



**Phone: 55 9156 1000**

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**Código de Ética**

**Código de Conducta e Integridad**

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