



July 18, 2016

For more than four decades, ALFA has conducted its business strategy based on a philosophy of highly ethical and moral values, and honesty in all of its business endeavors.

Nevertheless, facing the increasing threat of corruption, which jeopardizes society's own foundations, attacks human dignity and hinders economic growth, it is necessary that all of us, as a corporation, reinforce our commitment to continue honoring our values so that we do not compromise our long-lasting reliable relationships with the people and organizations we interact with.

With that in mind, and in addition to our Ethics and Behavior Code, we have decided to issue and release an Anticorruption Policy, which ratifies the commitment of each and every individual who is part of ALFA, of conducting our work activities honestly and always abide by the law.

This Policy clearly and concisely describes the behavior that ALFA expects from each and every one of its employees in their daily work, pursuant to any aspect related with corruption.

It is also applicable to all of us that represent or are part of ALFA, starting from the President, title that I hold, and throughout all the levels, roles and areas of our organization, without any exception whatsoever.

I am confident that, as always, I can count on your full support for this joint effort, so that ALFA continues to stand high through its standards of reliability, honesty and transparency.

A handwritten signature in black ink, appearing to read "Álvaro Fernández Garza".

Álvaro Fernández Garza  
President of ALFA



# ANTICORRUPTION POLICY

## OBJECTIVES

Reaffirm to all employees and directors of ALFA company the mandate of conducting all their activities in abidance of the company's ethical and integrity standards, and at the same time comply with the anticorruption laws and policies applicable in the countries where ALFA operates, including the U.S. Foreign Corrupt Practices Act, FCPA.

Establish the basic rules and framework for preventing, detecting, investigating, remedying and, if applicable, penalizing any individual, who works or represents ALFA and had committed an act of corruption under any circumstance, form or manner.

## SCOPE

This policy is applicable to:

- ALFA, its subsidiaries and organizations under its control, in all countries where it holds operations.
- Every employee, executive, director or board member of the company, notwithstanding hierarchical levels or roles (duties).
- Every individual that either directly or indirectly acts on behalf of the company, such as representatives, agents, consultants, advisors, distributors, etc.
- Suppliers, contractors, subcontractors and individuals that do not represent the company but provide a service to it will be notified of the existence of this Policy and will be encouraged to observe it.

## GUIDELINES AND PROCEDURES

### Definitions

#### **Corruption or bribery acts:**

Offer or promise, pay or receive money or valuables to any individual or entity, to improperly influence their acts or decisions in order to obtain an unfair or unlawful benefit or advantage either at as a personal favor or for the company.



The mere act of offering or promising any kind of wrongful compensation, even if the act had not been completed, it is itself an act of corruption.

**Valuables:**

Gifts, invitations to entertainment events, travel expenses, employment opportunities and other perks or benefits.

## Guidelines

All anti-corruption laws or regulations applicable in all countries where the company operates shall be observed promptly and at all times, always honoring the moral value of honesty.

It is strictly prohibited that employees, contractors or representatives of the company perform, order, authorize, promise, conspire, or induce corruption acts, whether directly or through third parties.

## Relationships with other companies or institutions

It is strictly prohibited to offer, solicit, pay or receive any kind of economic compensation or valuables from or to customers, suppliers, companies or other organizations or entities in order to obtain an unfair or improper business advantage.

## Relationship with authorities

It is strictly prohibited to perform acts of bribery towards any kind of authority including government officers, company employees or government-owned entities, as well as members of political parties, candidates for public offices, with the purpose of inducing or causing an action or inaction to obtain a benefit, either personal or for the company.

## Gifts and hospitalities

It is strictly prohibited to offer or give valuables, either directly or indirectly, when these valuables exceed reasonable business practices, are inappropriate, or have not been entered into the accounting records of the company

All gifts received by ALFA personnel shall comply with the provisions of policy PO-AL-AU-02 Conflict of Interests.

## Accounting records

Company's accounting records will be kept in compliance with corresponding guidelines and



legislations, including the anti-corruption laws.

ALFA Companies will keep accounting records in such a manner that they reflect every transaction with precision and with reasonable detail.

## Use of assets

The use of the company's assets or resource for any illegal purpose or against the company moral values is strictly prohibited.

## Disciplinary measures

Compliance with this Policy is a requisite for employment in ALFA and its affiliate companies.

Any director or employee of the company that infringes or fails to comply with this anti-corruption policy shall be subject to applicable disciplinary measures, including termination of the work contract or even reporting complaint before corresponding authorities.

## Reporting

Any director or employee of ALFA having information of any act of corruption or any indication that such acts are occurring, will immediately report it anonymously through the Transparency Mailbox, or in person before his/her superiors, provided that they are not involved.

ALFA Transparency Mailbox <http://www.alfa.com.mx/transparency.html>