



## COMPLIANCE POLICY

In FRISA we are committed to high standards of integrity, acting to enforce compliance and avoid violations, to build trust and credibility within and outside our company.



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## Message from our CEO

FRISA is committed to clients, suppliers, our employees and their families, and to the community. The best way to ensure long-lasting and trusting relationships is through building sustainable relationships based on openness and trust.

Achieving this implies that those who are part of the organization or have a relationship with it, work in a fair and transparent way, in accordance with the laws, rules, regulations and according to the highest ethical standards.


Our Integrity Policies seek precisely to strengthen the activities that contribute to achieving transparency in our actions and inspire our employees to ethical performance. This behavior guide not only includes your responsibilities, but also provides guidance on how to act in any situation.

Understanding these policies and living them is essential to prevent risks, take care of the work environment that we all enjoy, as well as take care of our image and reputation, because although it takes years to forge a culture of integrity and ethics, it only takes a moment to destroy it. Therefore, we cannot underestimate it. We must invest in it consistently to earn the trust of co-workers, customers, investors and communities, helping us to be seen as a trusted partner in the markets in which we operate.

I invite you to adhere to our Integrity Policies, reporting your doubts or reporting when you observe any breach of these. Remember that it is FRISA's policy not to retaliate against anyone who reports in good faith.

I count on your support, enthusiasm and continuous commitment to strengthen in our actions all those aspects that contribute to guarantee the transparency of our activities.

**Carlos Garza | CEO**

A handwritten signature in black ink, appearing to be "Carlos Garza", written over a faint, circular watermark or background graphic.

# FRISA Code of Conduct

- 1** We comply with current laws and regulations to achieve our objective.
- 2** We promote fair benefits for our employees and treat them with dignity and respect
- 3** Our business practices are carried out with honesty and transparency, complying with the quality and reliability of the information.
- 4** Relationships with clients and suppliers are carried out with professionalism and integrity.
- 5** Every employee, client, supplier or third party must report any suspicion or violation of the Code of Conduct and Integrity Policies through our compliance channels.

# FRISA Integrity Policies

## OBJECTIVE:

FRISA's Integrity Policies establish rules and responsibilities that all FRISA employees, clients, suppliers and shareholders must comply with, in order to avoid any situation that may damage the image of our company in our business relationships. For this reason, we continually strengthen values and promote ethical conduct in risk management, in labor, commercial and information management practices, which contribute to guaranteeing the transparency of our activities.



# Leaders responsibilities



**In FRISA, leaders are responsible for creating a culture of compliance in which employees understand their responsibilities and feel comfortable expressing concerns without fear of retaliation, through the following actions:**

## PREVENT

- Set an example of integrity with actions and not just words.
- Verify that employees understand that ethical conduct and compliance with FRISA policies are more important than results as a business.
- Create a suitable work environment in which employees feel confident to raise concerns.
- Communicate the importance of honesty and integrity in every situation that arises.
- Define, participate and train the personnel responsible for compliance with FRISA's Integrity Policies.

## DETECT

- Lead compliance processes with the review and monitoring of dashboards.
- Evaluate periodically with Leaders of Internal Audit, Finance and Human Resources managers.
- Search continuous improvement in reporting, investigating, mitigating and implementing control processes to detect compliance risk.

## RESPOND

- Document and notify the reports or concerns received by any employee using the appropriate channels.
- Establish effective corrective measures to address and mitigate identified compliance weaknesses.
- Include employee integrity reports in evaluations and also in reward & recognition programs.

# Employee responsibilities

## Every employee must:

- Understand the FRISA Integrity Policies that apply to their job responsibility and work function or department.
- Keep up-to-date on developments in your area or in the industry, in order to comply with the laws and regulations applicable to activities at FRISA.
- Understand that FRISA can review, audit, monitor and disclose information processed in computer equipment provided by the FRISA Information Technology department.
- Immediately “must” report any suspected violation of FRISA policies or laws and honestly cooperate in any investigation.

## What is Fraudulent Activity?

**Deceit, trickery, dishonest practice, or breach of confidence, intentionally perpetrated for profit or to gain some unfair or dishonest advantage.**

**FAILURE TO ADHERE TO INTEGRITY POLICIES WILL FACE DISCIPLINARY ACTION THAT MAY INCLUDE TERMINATION.**

## **SOME EXAMPLES OF BEHAVIORS THAT LEAD TO DISCIPLINARY ACTION ARE:**

- Violating FRISA Policies and requesting that others do the same.
- Retaliate against another employee for reporting an integrity concern.
- Failure to immediately report a violation (suspected or confirmed) of FRISA’s integrity policies.
- Failure to cooperate fully and honestly with FRISA in investigations of possible violations of integrity policies.
- Commit fraudulent acts to the detriment of FRISA; that is, a deliberate action to gain an illegitimate personal advantage. For example: falsifying documents, manipulating data, using insider information, extorting, stealing, etc.
- Engaging in fraudulent activity, this includes but is not limited to falsification of information, intentional omission, false pretenses, and deliberate misuse of qualified resources.



# Zero tolerance for retaliation

Anonymity and protection for those who report suspicious and/or dishonest act

Any Employee who retaliates against another for having reported a suspicious and/or dishonest act is subject to disciplinary measures that may lead to the termination of the employment contract in accordance with current laws.

Retaliation manifests itself in many ways:

- A poor performance Review.
- Denial of a promotion.
- Being hampered, for example, in invitations to important meetings.
- Be treated with disrespect, threats or intimidation.
- Negative perception on the part of the accused's colleagues.
- Segregation in social events.

## YOUR RESPONSIBILITIES

- If you're a victim of retaliation, you must report it to the Human Resources department, Internal Audit or through the compliance channels.
- Take care of the anonymity of the people who report or participate in the investigation of a suspicious act, whether confirmed or not.

### What is retaliation?

**It's the action that seeks to dissuade or punish someone for making a complaint or participating in the investigation of a possible ethical violation.**



# How to report a complaint?

## POLICY

FRISA offers various communication channels to present concerns or suspected non-compliance with the Integrity Policies, Values and Code of Ethics.

The complaint can be made directly or in writing to:

- Immediate supervisor
- Human Resources Leaders
- Internal Audit Leader

There is also a “Complaint Mailbox” in which the Employee can make their report confidentially or anonymously.

- Website: [www.FRISA.com](http://www.FRISA.com)
- WhatsApp: 81 2152 9114
- Email: [integridad@FRISA.com](mailto:integridad@FRISA.com)

## YOUR RESPONSIBILITY

- Report in a timely manner any suspicious act or breach of the FRISA Integrity Policies, Code of Ethics and Values.
- Use the communications channels described here to make the report and provide as much detail as possible for an effective investigation process.

### What can you report?

- Dishonest acts
- Harassment
- Indiscipline
- Bribes
- Theft
- Plagiarism
- Discrimination
- Unethical behavior
- Misuse of equipment
- Among others





# Conflicts of interest

Family business or employment relationships

## POLICY

- It is common for employees to have social and family relationships with other employees, suppliers and customers. Therefore, this policy promotes transparency and encourages reporting any conflict of interest that could be considered favoritism or that interferes with the exercise of independence of opinion regarding the best interest of FRISA.
- The foregoing will prevent the employee from benefiting from the relationship that unites him with a competing company, clients, suppliers of goods and services, or that provides essential or similar services to the operation of the business.

## Interest conflict

Refers to cases in which the employee has a family, sentimental relationship with a person who works for a client, direct competitor, supplier or any service provider of FRISA and whose position could affect the decisions of the FRISA employee or the company itself.

## YOUR RESPONSIBILITY

Reporting allows management to act with transparency by eliminating or mitigating the conflict of interest.

Therefore all employees must:

- Inform in case of contracting services or conducting business with individuals or companies that are owned by the same FRISA employee or their family members and that could interfere in the company's operations, personal benefit, economic or labor interests or affect the work day.
- Notify immediately and in writing to the direct manager, with a copy to the Manager of the area and the Director of Human Resources to proceed with the investigation and decision-making.
- Obtain authorization from FRISA's Human Resources and Legal Department before hiring, promoting or directly supervising a family member or close friend.
- Avoid any activity that constitutes a conflict between your personal interest and the interests of FRISA.



# Workplace harassment and forced labor

## Fair labor practices

### POLICY

At FRISA we are committed to fair labor practices promoting the well-being of our employees.

- We prohibit any type of harassment and bullying in all its forms, regardless of who the victim is or what their hierarchical level is.
- We do not discriminate people for any reason, including race, marital status, way of thinking, gender, social or economic class, religion, political conviction, pregnancy, sexual identity or preferences, illness or national origin.
- The selection and hiring of personnel is based on their competences, academic background, capacity, professional experience and level of identification that candidates have with the values of the company.
- We comply with the laws regarding freedom of association, privacy, collective bargaining, industrial safety, work hours, remuneration and fair benefits; also with the laws that prohibit harassment, forced or compulsory labor, hiring of minors, human trafficking and employment discrimination.

### YOUR RESPONSIBILITY

- Treat employees, clients, suppliers and third parties with respect and professionalism, avoiding incurring in any act of harassment.
- Let the harassing person know that their behavior annoys and offends you and that you want them to stop doing it.
- Notify your immediate supervisor, Human Resources or use the compliance mailbox system, to report any act of harassment, discrimination, harassment of forced labor of which you are a victim or if you have perceived in FRISA.
- Carry out the hiring and promotions based on skills, performance results and experience of the employees.

#### Behaviors that may constitute bullying and harassment

- Teasing, joking, comments and awkward questions about your sex life.
- Compliments or unwanted comments about their appearance.
- Morbid looks or suggestive gesture that annoy him/her.
- Unwanted phone calls, emails or whatsapp of a sexual nature.
- Threats that negatively affect your employment situation in case you do not accept sexual invitations or proposals.



# Protection of Assets

Proper use of equipment, materials and work tools

## POLICY

FRISA is committed to granting its employees the assets necessary for the execution of activities in accordance with their functions within the company.

Assets are the source and reflection of the innovation and growth of the company, which is why they must be cared for, as if they were their own and protected from abuse and theft.

**Assets are considered:  
Any space or physical object that FRISA provides to its employees to carry out activities, such as:**

- Facilities
- Vehicles
- Computers
- Computer equipment
- Machines
- Tools
- Cash
- Among others

## YOUR RESPONSIBILITY

- Caring for and properly using the assets granted by FRISA for the execution of your activities and not for personal gain.
- Review equipment, material and work tools before using them making sure they are functional for the operation.
- Provide the assets in physical verification processes or when required by FRISA.
- Report any damage or loss of equipment, materials and work tools promptly to your immediate supervisor, the Human Resources department or the Internal Audit department.
- Report immediately any suspicious behavior in which FRISA assets are at risk.
- Deliver the assets at the end of the employment relationship to FRISA or when changing function or moving among FRISA divisions.



# Information quality

Reports, documents, records, metric indicators

## POLICY

- The registration, conservation and preparation of financial reports for the different interest groups are subject to the corresponding legal provisions, with the current accounting standards and the control guidelines issued by FRISA.
- The operations that involve an accounting record must comply with the fiscal requirements in a total and complete manner and be registered in a timely manner.
- It is forbidden to modify or falsify documents, records, metric indicators and reports, as well as to conceal information that could alter financial records and affect or could affect FRISA.

## YOUR RESPONSIBILITY

- Carry out your work taking care of the controls that fully reflect the transactions and operations, as well as preventing or detecting inappropriate negotiations or movements.
- Avoid acts of manipulation or omission of information in any type of report that could affect FRISA's decision-making.
- Promptly notify the Internal Audit department, HR or Finance Department of any action, transaction, manipulation or falsification of records or documents.

### The reports include:

**Financial statements, tax returns, billing reports, metric indicators, travel expense reports, payments of any kind, overtime, safety, quality and production reports, among others.**



# Intellectual property

Licenses, trademarks patents and permits

## POLICY

At FRISA we take care of and protect the intellectual property of the company, clients and suppliers, which is the reason we:

We respect the patent rights of others, trade secrets and private information during our research and development processes.

- We abide by applicable intellectual property license agreements, trademarks, patents and permissions and other contractual terms, which govern the use and disclosure of the private information of others and their intellectual property rights.

### Note:

- **Intellectual property includes patents, trade secrets, trademarks, copyrights and design, manufacturing processes, drawings, plans, marketing documents, among others.**
- **All this applicable for all means of information extraction, be it verbal, written, photographic, video recording, USB memory, hard disk or email, among others.**

## YOUR RESPONSIBILITY

As a employee, you have the responsibility to safeguard the Intellectual Property of FRISA or of our clients, business partners, suppliers or third parties through:

- Identify, classify, label and report the confidential information of FRISA, in order to apply the necessary controls for the use and protection of private information.
- Do not obtain, access, share access or use the information from FRISA or other internet address (IP) without authorization when leaving FRISA.
- Consult with the Information Technology, Legal, HR or Internal Audit department in case of doubt to identify, manage and protect FRISA's intellectual property.
- Do not provide confidential information of FRISA without the authorization of the Engineering Director or Legal department, who will verify that there is no conflict or breach of confidentiality agreements.



# Data privacy

Employees, clients and suppliers

## POLICY

FRISA is responsible for safeguarding the confidential information of its employees, received at each stage of the hiring process or in research and development processes.

- We do not request, accept, use or disclose private information of our employees or candidates for recruitment, or of visitors, external personnel who participate in research or other third parties without authorization.
- We protect the personal data of our employees and information of clients and suppliers and, it is only used with legal or business purposes.
- In application processes, we comply with the guidelines established on the Data Protection Law for protection and disclosure of information.

All this is applicable for all means of information extraction in verbal, written, photographic, video recordings, USB memory, hard disk and email, among others.

## YOUR RESPONSIBILITY

- Do not provide confidential information of personnel or third parties, collected by FRISA, without the authorization of the Legal department.
- In case of requesting information from external personnel for the investigation or development process, notify the Internal Auditor, HR or Legal department for the application of internal controls and compliance with the Data Protection Laws.
- Obtain confidentiality agreements for collaborators, clients and suppliers when starting the business relationship with FRISA and share them with the Legal Department for review.
- In case of identifying the extraction, theft or misuse of the information collected by FRISA, from employees or third parties, report it to the Internal Audit department.

### Private information is considered:

- **Personal data such as full name, address, marital status, date of birth, nationality, blood type or medical examinations.**
- **Curriculum information: place of education, previous employment, references, professional experience.**



# Supplier relationships

Anti-corruption, improper payments, false invoices, labor practices.

## POLICY

- Employees must not directly request or accept “things of value” from a supplier or a relative, as this may mean using their position or power to favor the supplier by giving it an undue advantage.
- Bribery and corruption are not tolerated, regardless of level of officials or individuals.
- Payments to suppliers must be made solely based on the services, products or materials received and verified by the requesting users, who will authorize the supplier’s invoices.
- At FRISA we make sure that we only do business with suppliers that comply with the laws, internal controls and policies of our company.

### “Valuable things”

Refers to money, gifts (objects or favors with a value greater than \$50 US dollars), personal favors, meals, entertainment, shares and discounts on products, among others.

## YOUR RESPONSIBILITY

- Do not accept gift with a value greater than \$ 50 USD, sponsorships or favors from suppliers, as it could be interpreted as an act of corruption.
- Report to your immediate supervisor or the Internal Audit department, any suspicion or knowledge of an act of corruption or bribery between employees.
- Verify that the issuance and collection of invoices from suppliers correspond to the services and/ or products purchased based on the prices previously negotiated when making the request and authorization of payment.
- Report to the immediate supervisor any invitation to have breakfast, lunch or dinner for business.
- Verify prior to contracting suppliers, who are not on the list for allegedly non- existent operations, in accordance with article 69-B of the Federal Tax Code (CFF), through the website of the Tax Administration Service (SAT).



# Clients relationships

Improper payments, labor practices

## POLICY

- Employees must not give, offer, request or promise clients, “anything of value” with the intention of inducing them to use their position to obtain an apparent and undue advantage for the company or for the employee himself.
- Bribery and corruption are not tolerated, regardless of the level of officials or employees.
- In FRISA we ensure that we only do business with clients who comply with the law, internal controls and policies of our company.
- Before starting the commercial relationship with our clients, we carry out the process of “Know your client”

### “Valuable things”

Refers to money, gifts (objects or favors with a value greater than \$50 US dollars), personal favors, meals, entertainment, shares and discounts on products, among others.

## YOUR RESPONSIBILITY

- Do not give gifts, sponsorships or special discounts to clients, as this could be interpreted as an act of corruption.
- Report to the immediate supervisor, area director or Internal Audit department, any suspicion or knowledge of an act of corruption or bribery between employees and clients.
- Before starting the commercial relationship with the client, make sure to exercise due diligence through the “Know your client” process, in order to avoid doing business with companies involved in illegal acts.
- Be attentive to the warning signs in the prevention of money laundering and terrorism, and in case if they are identified, immediately notify your supervisor or the Internal Audit department.
- Inform the direct manager and the Human Resources department of gifts with a value greater than \$50 US dollars; also in case of receiving an invitation to have breakfast, lunch or dinner for business.





# International Trade Controls-Imports & Exports

International trade practice

## POLICY

Being a world leader company in the sector in which it participates, FRISA carries out a large number of imports and exports of tangible products, technical and intangible data such as software and services, therefore:

We comply with current international trade laws and regulations, which include export and import controls to safeguard confidential information.

- We use the export / import classification correctly according to the type of product.
- We verify that all required licenses or authorizations are in force, prior to export / import.

## YOUR RESPONSIBILITY

- Use only customs agents authorized by FRISA.
- Report in a total, complete and timely manner the import declarations, description and classification of products, technical data or services.
- Previously verify documentation and permits when exporting and/ or importing products or materials, technical data or services.
- Request advice from the Foreign Trade department in case of having any doubt about the export or import handling of any tangible product, technical and intangible data, such as software or services, prior to making the move.

### International Trade Compliance:

**Failure to comply with the laws and regulations on international trade can damage the national security of the countries, foreign policy, terminate business, as well as destroy the reputation of FRISA, without prejudice to civil and criminal responsibilities that may result.**



# Cybersecurity

Protection of digital information

## POLICY

At FRISA we safeguard the rights of privacy and data protection from cyber risks of company information and networks, therefore:

- FRISA makes sure to protect its networks, systems, devices and information through the Information Technology department, which performs tests & processes to monitor vulnerabilities and threats to cybersecurity.

### Information technologies:

It refers to all computer equipment (hardware) and / or communications, systems (software) and / or applications that they contain; as well as the services associated or delivered with them.

## YOUR RESPONSIBILITY

- Grant access to FRISA information only to authorized persons who require it for business, commercial and legitimate purposes.
- Avoid unauthorized access, loss, disclosure or destruction of FRISA information.
- Generate strong passwords and do not share them.
- Identify and report the signs of *phishing* to Information Technology department and recognize the intentions of outsiders to obtain information from FRISA in an inappropriate way.
- Use only systems and tools authorized by the company for the storage, transmission and backup of FRISA information.
- Make sure to make backups on a regular basis.
- Consult with the Information Technology leader before implementing or using any system that could put FRISA information at risk.



# Government relationships and authorities

Negotiations with ethics and adherence to current laws

## POLICY

At FRISA we comply with the applicable laws and regulations of each country in the commercial and manufacturing procedures with governments. Our conduct of business is governed by the highest ethical standards.

### Government official:

**He is a servant of the State, appointed by provision of the Law, by popular election or by appointment of competent authority, to occupy higher degrees of the organic structure and to assume functions of representation, initiative, decision and command.**

## YOUR RESPONSIBILITY

- Consult with the Leader of the Legal department before attempting or carrying out any business or procedure with the Government.
- When initiating or requesting a procedure in any government agency, you must first review the requirements with the interested parties and accept only the conditions that FRISA can meet.
- Safeguard the supporting documentation of procedures carried out with the Government that proves adherence and compliance with current regulations.
- Do not give, offer or promise, directly or through third parties, anything of value to a government official or an individual, or to their relatives, since this may imply inducing him to use his position or power to help the company to gain an undue advantage.



**FRISA**