

CONFLICT OF INTEREST STATEMENT

1. Policy

It is the policy of VYNMSA Corporation to ensure that the execution of its operations is transparent and at no time affect judgment in decisions of any kind, whether financial, commercial, developmental or other, that could influence fair and ethical practice.

2. Objective

Prevent conflicts of interest or, in cases where they arise, manage them with due care and diligence.

This document is designed to assist Employees and Third Parties related to VYNMSA companies in:

Identify and prevent situations that may give rise to Conflicts of Interest,

- a) Defining the way in which Conflicts of Interest must be notified; and
- b) Establishing the way in which Conflicts of Interest should be managed and resolved.

3. Outreach

Applicable to all employees and third parties related to VYNMSA companies.

4. Definitions

Conflict of	Exists when directly or indirectly the personal interests
interest:	of employees or their relatives influence in a real,
	potential or apparent way in the decision-making
	process of operations or negotiations, opposing the
	interests of the Companies and the responsibility they
	must act for the benefit of the Companies. Conflicts of
	interest can occur at all organizational levels and can be
	of an economic or non-economic nature.
Potential Conflict of	This refers to situations in which conflicting
Interest:	interests may exist under certain
	circumstances, but the employee has not yet
	acquired a commitment or assumed a position



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	that puts him/her in conflict, but which may
	occur at any time.
Actual conflict of interest:	It is the conflict of interest that has
	materialized. For example, one in which the
	employee executes specific actions with the
	intention of obtaining a benefit that is contrary
	to the interests of VYNMSA.
Apparent conflict of	This is the situation in which, although there is
interest:	no real conflict of interest, but it could give the
	impression that it exists.
Third parties:	Are all stockholders, consultants, representatives,
	distributors, agents, dealers, licensees, general counsel,
	resellers, subcontractors, franchisees, accountants,
	attorneys, sales representatives, customs brokers,
	customs agents, intermediaries, similar intermediaries
	or any service providers with whom the Companies may
	have a relationship.
	or any similar service provider with whom the
	Companies may have a relationship.
	Likewise, this concept includes all Business Partners and
	Associations with whom the Companies do business, as
	well as any person who interacts with government
	entities or officials and whose activities are performed
	on behalf of the company they represent.

5. Guidelines

It is forbidden for employees and their family members to take advantage of VYNMSA's own opportunities for their direct or indirect benefit, so it is their responsibility to identify when a situation arises that may place them in a conflict of interest, whether real, potential or apparent, so that the corresponding measures can be analyzed and taken.

If you have any doubts about the circumstances that may generate a Conflict of Interest, you should consult with your immediate supervisor, contracting area, Human Resources or VYNMSA's legal department. This should be documented via e-mail to have a record of the notice.

To facilitate the identification of conflicts of interest, the following is a non-exhaustive list of the most common situations that, if not authorized, could lead to a Conflict of Interest:



- External appointments, such as holding additional positions or activities in businesses outside VYNMSA.
- Serving on boards of directors or councils of companies outside those described in the scope of this document.
- The Collaborator has influence in contract decision making (Contractor/Collaborator).
- Receive gifts, benefits and attentions from a supplier, customer, competitor or third party of VYNMSA.
- Maintaining a sentimental relationship in which there is a relationship of subordination between workers in the same area, without this having been duly reported at the time of its occurrence and the appropriate actions having been taken by the immediate supervisor.
- Performing a business function and a control function simultaneously (e.g. judge and party, approver and executor).
- Hiring public servants or former public servants to take advantage of privileged information or relationships.

6. Statement

I confirm that I have read and understood VYNMSA's Conflict of Interest Policy. I certify that I have complied with the provisions of this Policy. I attest that I have fully disclosed all information contained in this Statement in an honest and truthful manner.

I further acknowledge that I have an absolute duty to report misconduct. I am also responsible for reporting any instances where my independence or objectivity is impaired, and which are not specifically covered by this policy.

7. Annexes



Annex I. Format - Declaration of Conflict of Interest

Nicolás Olivares Alvarado Strategic Planning and Finance Manager

i orini Decidi atioi	of Conflict of Interest
Now I do NOT have any conflict of	interest. ()
Now I DO have a conflict of intere	st ()
In case of conflict of interest, if ye conflict:	s to the above, detail the origin of the
Name:	
Place:	Date:



Validate:		
Carlos García Human Capital Director	Juan Carlos González Administration Director	Roberto Martínez Legal Director
Authorizes:		
 Mario Chapa		

General Director