

Anti-corruption Policy of Hoteles City Express, S.A.B. de C.V.

As part of the activities of the staff of Hoteles City Express, S.A.B. de C.V. and its subsidiaries ("Hoteles City"), they interact with officers of public institutions and government authorities, both local and federal, of the cities where Hoteles City operates. Hoteles City intends that this interaction takes place in an honest manner, complying at all times with the applicable laws and regulations, and with the highest ethical standards.

General Guidelines

These policies and guidelines will be applicable to regulate the activities that the staff of Hoteles City carry out as part of their daily activities, whether directly or indirectly with any public officer, government employee, national or international public organization, or with a member of a political party, or a candidate for public office, any government department or agency or any officer or employee of a government-owned enterprise ("Public Officials").

"Corruption" means all those acts of offering, delivering, receiving or requesting, whether directly or indirectly, anything with monetary value or in kind with the sole intention of obtaining a gain or influencing the decision of a Public Official.

"Fraud" means any action or omission, including the misrepresentation of facts that, knowingly or recklessly deceive, or intend to deceive, anyone to obtain a financial gain or of any other kind or to evade an obligation.

"Coercive Practice" means the damage or threat with the sole purpose of harming or causing damage, directly or indirectly, to persons or to the person's property, in order to unduly influence their actions and/or decisions.

"Corrupt Practice" means an agreement between two or more persons intended to achieve an improper purpose, including influencing the actions and/or decisions of a third party.

For purposes of these Anti-corruption Policies, Corruption, Fraud, Coercive Practices and Corrupt Practices will jointly mean ("Corrupt Acts").

Prohibitions

With the sole purpose of preventing Corrupt Acts within the daily activities of the staff of Hoteles City, it is expressly forbidden:

- That staff of Hoteles City, directly or through third parties, give or promise to give something of value to a Public Official in exchange for influencing his or her decision in accordance with the performance of his or her official duties or for engaging in an illegal act, including giving an "appreciation" gift such as trips, entertainment and gifts, for carrying out the regular or extraordinary activities of his or her position.
- All the practices that by fact or by appearance may presume the existence of a bribe to any Public Official, since they are unethical practices that may affect the image and reputation of Hoteles City.
- Obtain (or offer to third parties) free or discounted services unless the above is expressly permitted by these Anti-corruption Policies.

- The use of funds or assets of Hoteles City for any illegal purpose that is improper or contrary to good practices.
- Facilitation payments to any Public Official. "Facilitation Payment" means those payments made in cash or in kind, including trips, with the sole purpose of obtaining a gain or document from the competent authority.
- The performance of any Corrupt Conduct, either with Public Official or of any other nature.
- Actual threats or illegal actions, such as personal injuries or kidnapping, property damage or injuries to the legally recognized interests, in order to obtain an improper gain or to evade an obligation.
- The manipulation of bids or in relation to the hiring of any Public Official.
- The deliberate destruction, forgery, alteration or concealment of material evidence in relation to a research or making of misstatements to researchers, in order to materially prevent a research on the accusations of a Corrupt Conduct.
- The threat, persecution or intimidation of anyone to prevent such person from disclosing his or her knowledge of matters relevant to the research or from carrying out the investigation of an infringement to these Anti-corruption Policies.

It should be noted that using a third party to perform any of the aforementioned activities is as incorrect as doing so directly.

For the above, in Hoteles City, there is the obligation to carefully select contractors and suppliers who, working for the company, may interact with Public Official.

Anti-corruption Program

In order to comply with these Anti-corruption Policies, Hoteles City has created the following program, that is applicable for all areas and positions, regardless of the hierarchic level.

1) *Contracting Clauses*

The agreements or documents entered into between Hoteles City and any of the Public Official must include at least the following clauses:

- The compliance requirement with these Anti-corruption Policies.
- The right of Hoteles City to rescind the agreement and withhold the payment if the supplier pays bribes or infringes any of the terms of the agreement, including the right to conduct an audit.
- The requirement that the payment is deposited in a bank account in the name of the supplier and in the country where such supplier is located, and not abroad or in a jurisdiction that is a tax haven.

2) *Special Payments*



In case of having suppliers with extremely high risks, it will be necessary to perform the review and previous approval of the payments.

Therefore, it will be necessary that Public Officials submit the documentation required by Hoteles City, with a specification of the project summarizing the provided services, review and analysis of the invoice entries compared with the agreement, as well as several authorization levels depending on the sum of the payments and the perceived risk.

3) *Donations*

In order to prevent that charitable donations are granted to companies acting as vehicles for the bribes with Public Officials, all charitable donations must be submitted to the Ethics Committee, for their consideration, and approval, having to verify the purpose of the gift and the good faith of Hoteles City.

4) *Inspections*

Hoteles City will randomly conduct reviews of (i) the places where Hoteles City operates; (ii) the accounting books and records; (iii) the petty cash and other strategic areas in charge of accounting.

Infringements and Complaints

The person infringing these Anti-corruption Policies may become liable to onerous penalties by the supervisory bodies of Hoteles City; as well as to legal and criminal actions against those having promoted them.

Hoteles City makes the following email available to its employees to anonymously report any unethical acts and conducts constituting an infringement to these Anti-corruption Policies:

denuncias.hotelescity@resguarda.com
Subject: Anti-corruption Policies

As well as the following means of telephone contact:

Mexico: 01-800-1223-3312 / Colombia: 01-800-752-2222 / Costa Rica: 0-800-054-1046

Employees reporting an alleged infringement to these Anti-corruption Policies will not be subject to disciplinary action or punishment for making the report, except that such employee is the one who has performed the improper conduct or act in accordance with them.

Notwithstanding the provisions already established in these Anti-corruption Policies, Hoteles City will train executives, associates and others in relation to these Anti-corruption Policies and on modifications to them, whether due to legal or industry changes, as well as on new applicable procedures.

For all those matters not provided for in these Anti-corruption Policies, the Code of Ethics will be applicable, and the Ethics Committee will be in charge of their supervision and compliance.





This policy will be published in the adequate internal media and will be disclosed to each of the employees, suppliers, collaborators, third parties and related parties of Hoteles City Express, S.A.B. de C.V., who shall have a 10-day term of to accept it in conformity or to present their comments to the Ethics Committee of the Company through the aforementioned means, the mere fact of the continuity of the daily operation shall be enough evidence of its acceptance and shall make its compliance enforceable.

The establishment of these guidelines is authorized through the power invested by the Board of Directors of Hoteles City Express through the Corporate Practices Committee in the Ethics Committee of Hoteles City Express, S.A.B. de C.V. and subsidiaries, being this document signed by the Chairperson of the Ethics Committee of the Company.

Marco Saccucci Merolle

Chairperson of the Ethics Committee
Hoteles City Express, S.A.B. de C.V.

