

# Code of Ethics

The governing and guiding principle of our work

CITY CENTRO CITY EXPRESS SUITES CITY EXPRESS PLUS

cityexpress  
hotels

cityexpress  
Junior

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## To all the staff of Hoteles City Express:

From its beginning, Hoteles City Express, S.A.B. de C.V. (“Hoteles City Express”) has promised to operate with work values based on respect for the person and his or her comprehensive development, professionalism, commitment, inclusion, teamwork and meritocracy. Likewise, Hoteles City Express operates under principles of trust and loyalty that we have established over time with our employees, collaborators, suppliers, shareholders, investors, customers, guests and other members of our community. It is integrating part of our vision to make of Hoteles City Express one of the best companies of Mexico and Latin America, always being distinguished by our approach in human development, sustainability, safety, transparency and high corporate government standards.

We all must accept the responsibility that we have upon being part of Hoteles City Express and acting in accordance with our main work values and protecting our company's reputation. In this regard, it is essential that all of us at Hoteles City Express work together as a team, putting the interest of Hoteles City Express before any personal or professional motivation. Therefore, individualistic conducts or those that tend to affect others in pursuit of personal benefit are not acceptable. On a daily basis, we must focus our work on achieving the purposes set for the company within the framework of the granted responsibilities, as well as the lines of authorization and controls established by our organization chart and internal policies.

It is everyone's obligation at Hoteles City Express to provide a quality and service excellence to our guests and customers so that the prestige of our brand continues growing. In our daily relations, we must act with respect, honesty, responsibility, transparency, consistency, truthfulness, personal and professional integrity and inclusion. To continue operating under said premises, we have created this Code of Ethics, that we hope be a guide for all of us.

Abiding by the principles of Hoteles City Express that are contained in this document will promote a working environment with high professional and human standards. For the above, we consider that this Code of Ethics will reaffirm our commitment of adopting these values and conducting ourselves day by day in order to attain that us and our company responsible comply with our purposes and commitments, in harmony with our own aspirations and those of our community.

This Code of Ethics does not intend to replace our good judgment, or intends to intimidate or judge; however, it tries to focus our attention on the conducts related to each of the governing values of Hoteles City Express, allowing us this way to conduct effectively both our business and our professional relation. We hope that compliance with this Code of Ethics gives an example on the bases that must be built to attain our purposes as members of Hoteles City Express.

Sincerely,

**Luis E. Barrios Sánchez**

Chairman of the Board of Directors and CEO

## I. Introduction

This Code of Ethics describes the values and principles of behavior that we must observe and carry out upon performing our duties, identifies and recognizes the correct conducts and establishes how we must act in case of situations of conflict. Likewise, this Code of Ethics aims to serve as a guide to make the best decisions in our work, totally abiding by the principles governing the development of this company. Due to the above, it is essential to understand the content of this document.

Our daily actions and behavior show who we are as individuals and representatives of Hoteles City Express, for this reason and to reflect correctly how we wish to be seen by our collaborators, suppliers, shareholders, investors, customers, guests and other persons with whom we relate or coincide in the performance of our daily work, we must abide by the values and ethical lines of conduct provided for in this Code. However, this Ethics Code is not intended to be exhaustive, or include all the situations in which an ethical conflict may arise. The situations not provided for in this document must be resolved in accordance with a sound criterion of administration and good judgment.

Any question or comment that may arise in connection with this Code of Ethics must be consulted with the Ethics Committee of City Express or, in the last resort, with the Corporate Practices Committee of the Board of Directors of Hoteles City Express.

## II. Purposes

The Code of Ethics of Hoteles City Express has as purpose:

- Establish the principles to which the behavior of individuals working or interacting with Hoteles City Express must be subject.
- Inform the employees, collaborators<sup>1</sup>, suppliers and directors of Hoteles City Express, among others, the behavior obligations governing the relations with Hoteles City Express.
- Establish the procedures to be followed and the persons that should be contacted in case of situations of conflict.

## III. Scope of the Code of Ethics of Hoteles City Express

This Code of Ethics must have a

<sup>1</sup> For purposes of this Code, the term "collaborator" or "collaborators" means those strategic suppliers of services or inputs actively participating in the economic and business activities of Hoteles City Express and which are third parties independent from the organization.

general observance, that is, will apply to any person working and collaborating with Hoteles City Express, either as employee, collaborator, supplier, adviser, as well as to any other form of relation held with this company.

## IV. Governing Principles

### 1. With our guests

At Hoteles City Express we treat our guests with hospitality, honesty and respect, we have the obligation that, through our attention and courtesy, their stay at our facilities turns out to be a comfortable experience. We have implemented operation protocols in all the hotels to guarantee service quality and provide the highest security standards. Hoteles City Express does not discriminate against its guests on the basis of age, religion, sex, race, sexual preference, having suffered or be suffering any disease, including Covid 19, or any other condition.

As a hotel chain we seek to distinguish ourselves from competition, not only for the quality of our service at a reasonable price, but for the experience in the stay that we offer to the guest, the quality of the rooms and of the hotels in general. Our guests are entitled to receive what was promised to them, at the promised price. Misrepresentation of the truth or an interpretation of dishonesty

may endanger the trust and loyalty of our guests, damage our reputation and, in a given time, become liable to a legal penalty. In virtue of the above, we should always be honest and avoid confusing our guests in relation to the characteristics of any service that they will not receive.

### 2. With our suppliers and collaborators.

The relations that, as staff of Hoteles City Express, we have with suppliers of goods and services, must be carried out with transparency, competition, efficiency and in accordance with the established policies, since a good relation between suppliers and customers improves the quality of the final product and, as consequence, a better quality service is rendered to the guests.

At Hoteles City Express, we have the obligation to inform our suppliers in a clear, truthful and explicit manner, about the needs and characteristics of the products and services that we require, choosing the supplier providing the best conditions in relation to the quality, capacity, specifications of the product or service, as well as of delivery and price, among others. Suppliers must share the ethical values and commitments of Hoteles City Express, as well as meet the specific needs established in the applicable internal policies and have a solid

reputation of equity and integrity in their dealings.

At Hoteles City Express, we must inform our suppliers the results of contests and bids, so that these processes are transparent and fair.

Under no circumstances should we request, receive or offer gifts or money from suppliers we work with or from those suppliers who are competing to render services to Hoteles City Express. We have the obligation to explain to the supplier in a clear, kind and appreciate manner, that we cannot accept gifts or money, unless it is a symbolic gift that promotes its company, such as caps, pencils, mugs, etc. In case of being obligated to accept any gift as a gesture of kindness, we must give immediate notice to the competent division or management, as appropriate, and turn the object over to the Human Capital area.

The relations of our staff with suppliers should be free from any type of corruption. We must immediately report any doubtful situation to the applicable direct boss.

If a supplier is identified as being involved

in illegal acts or infringement to this Code, we will take the necessary actions, including, as the case may, terminating the business relationship.

### 3. With our investors and shareholders

Our investors and/or shareholders are essential for the existence of Hoteles City Express. With them, a relationship based on trust, honesty, ethics and transparency is developed. Due to the above, at all times our actions and daily work must contribute to the preservation of their patrimony and to the correct application of resources, seeking to create value from them.

All of us who work at Hoteles City Express must perform our duties efficiently. Furthermore, we must process and generate the precise and timely information allowing the investors to analyze the value of their investment. With the above, we will promote the investors' trust to continue investing or to invest for the first time, so that Hoteles City Express has a greater growth and eventually, better employment opportunities for its staff. At Hoteles City Express we are committed to manage the company in accordance with the best practices



in business management and corporate governance, as well as the highest quality standards in our industry.

#### 4. With our competitors

At Hoteles City Express, we compete showing the quality of our products and services; therefore, we must not make false comments or testimonies on our competitors having as a purpose to unfairly demerit them or interfere with their business relationships.

At Hoteles City Express, we emphasize our strengths in an honest and transparent manner. Otherwise, we may lose credibility on our products or services and be qualified as dishonest with our guests and other third parties with whom we interact. At Hoteles City Express, we have the obligation to use the information of our competitors in a legal and equitable manner, allowing us to show our competitive advantage, based on the practices of an open, free and fair competition.

#### 5. With society

##### a) Commitment with the environment

At Hoteles City Express, we take the steps

to protect the environment and the natural resources that we use, for example: (i) we recycle, reuse and separate waste, (ii) the components of our inputs have sustainability characteristics and specifications, and (iii) most of our suppliers are certified by the applicable agencies. All of us who work at Hoteles City Express have the commitment to use water, paper and electric power efficiently and to supervise that they are consumed without misusing them.

At Hoteles City Express, we have the obligation to comply with the sustainability principles, which contribute to the optimization of resources and watch that our operation does not produce pollution.

Our facilities have Avant-guard technology in order to preserve the environment. In addition, measures have been implemented for the saving and optimization of the resources that we use for our operation.

At Hoteles City Express, we distinguish ourselves for acting in a socially responsible manner, upon contributing with the communities in which we operate and minimize our impact into the environment.



Any failure, inconsistency or anomaly that we observe must be immediately notified to the Human Capital area for its immediate attention.

## b) Commitment with the communities where we operate

One of our priorities at Hoteles City Express is to contribute to improving the quality of life of the people of the communities where we operate, respecting at all times their customs and culture, as well their fundamental rights. At Hoteles City Express, we do not condone practices that constitute abuse or exploitation of minors, human trafficking or any other kind of illegal practices. If we observe, suspect or know that any of our properties is being used with illegal purposes or in a way that human dignity is not respected, or that any of our colleges is carrying out inadequate conducts out of the framework of this Code, we should notify the above through any of the means established in this document.

## 6. With the government

### a) Respect for the law

At Hoteles City Express, we have the obligation to observe and comply with the

applicable local laws and regulations and that regulate our duties at the places where we operate, in addition to the federal laws of the country in question. We are responsible for knowing the laws, regulations and other general provisions in order to perform our activities correctly. For the aforementioned purposes, we have the support of the Legal Management of the company, to which we can resort in case of doubts or of ignoring the laws that we must comply with. Ignoring the laws that we must comply with does not release us from undertaking the responsibilities resulting from any noncompliance; therefore, at Hoteles City Express we undertake the commitment of knowing and complying with them.

### b) Anti-corruption

Part of the daily activities of the staff of Hoteles City Express consists of interacting with officers of public institutions and government authorities of the places where we operate, thus, we should interact honestly, complying at all times with the established specific laws or regulations. It is strictly prohibited to give or commit to giving something of value to a public officer in exchange for influencing his or her decision in accordance with the performance of his or her

official duties or to commit an illegal act, including to provide an “appreciation” gift for performing regular activities of his or her position.

The person incurring corruption and/or bribery may become liable to onerous penalties by the bodies supervising this type of practices; as well as to legal and criminal actions against those having promoted them.

Care must be taken because using a third party to give a bribe is as wrong as doing it directly. Therefore, at Hoteles City Express, we have the obligation to carefully select contractors and suppliers who, working for the company, may interact with public officers.

## 7. With our staff

### a) Respect for the person

Each person possesses a unique value and at Hoteles City Express we recognize that the individual contribution by each of its employees is essential for the success of the company. At Hoteles City Express, we promote the development of each employee so that he or she may aspire to better opportunities and we propitiate his or her professional, economic and social growth.

All of us the employees of Hoteles City Express are entitled to be treated with respect, justice and trust, to work in a healthy and safe environment, allowing us to perform our daily activities.

At Hoteles City Express, we consider that respect for the person is essential to have a dignified, safe and equitable working place.

Under no circumstances at Hoteles City Express we shall tolerate discrimination (on the basis of age, religion, sex, race, sexual preference, having suffered or suffering any disease, including Covid 19, or any other condition), harassment (whether physical or psychological), the use of insults, mistreatment, abuse of authority towards the staff and/or any discriminatory treatment that puts at risk their integrity as a person and creates a hostile, unsafe, intimidating, offensive or uncomfortable working environment.

As staff of Hoteles City Express, we should follow the rules of behavior that are established in this Code in order to encourage and foster positive working relations.

### b) Equal opportunities

The results, the responsibility, the capacity, the availability, the commitment, as well as the loyalty and attitude that we show as

staff of Hoteles City Express in our daily work, will be those determining the labor growth of each of us. Consequently, any acts of favoritism are prohibited.

The aspects to consider during the processes of recruitment, selection, hiring, promotions, and recognition, will have their bases on equity and transparency, through the use of methodologies supporting and documenting the objectivity of said processes.

At Hoteles City Express, we are committed to providing employment and professional development opportunities to the best-qualified persons who have performed well in their jobs and who observe a conduct that respects and follows internal and external rules, without making any distinction based on personal characteristics.

### c) Safety and Security

At Hoteles City Express, we strive for protecting the health and security of our staff (as well as of the persons who visit us), since their physical integrity is our priority.

We have the responsibility to be vigilant

and to comply at all times with the safety and security rules established in the hotels and at our workplace for the rendering of our services.

Inside the facilities of Hoteles City Express and during the work schedule, employees, collaborators and suppliers are not allowed to drink alcoholic beverages or consume any kind of drug that is not under adequate medical supervision. Drinking alcoholic beverages with potential suppliers or customers must be moderate and with good judgment, which must be previously authorized by the respective area director or manager, as appropriate.

### d) Conflict of interests

As employees of Hoteles City Express, we are committed to fulfilling our daily obligations and executing our responsibilities in such a way that we achieve the purpose entrusted to us, always to the benefit of the company.

If during the performance of our duties, we face situations in which we obtain a personal benefit or for a third party with whom we have any kind of personal or working relationship, we are facing a "conflict of interest".

As employees of Hoteles City Express we are committed to avoiding personal and business investment decisions that could affect our ability to make decisions in favor of our company.

We should declare any interest that may start a conflict with the company, since otherwise, we may be liable to the penalties established below or to those that are imputed by the applicable area director and penalized by the Ethics Committee.

#### e) Work of family members

At Hoteles City Express we are not allowed to work with family members, whether of direct or indirect line or by marriage, in the same area or department; or in different areas but that due to their nature may have direct communication. In case this situation arises or if there is a romantic relationship between employees, we must immediately notify the Human Capital area in order to make the necessary reassignments or separations, that will prevent any type of conflict of interest.

#### f) Respect for internal regulations

This Code of Ethics, the regulations,

the policies, procedures, instruction sheets, and other internal regulations were established at Hoteles City Express to perform our work in an efficient, respectful, and orderly manner, which contributes to the attainment of the goals and purposes of the company.

Therefore, at Hoteles City Express, all of us without exception have the obligation to comply with the internal regulations in the performance of our daily activities; if we do not know it, we have the responsibility to consult about said regulations with the applicable area managers.

#### g) Free services and/or discounts

At Hoteles City Express, we are not allowed to offer free or discounted services to third parties, unless the above is expressly permitted for the benefit of employees and directors by the applicable policy.

#### h) Care of the assets of Hoteles City Express and of the work tools

All the real estate, facilities, furniture, equipment, technology and tools owned by Hoteles City Express are to perform our work comfortably, with the

necessary conditions and elements for its performance, thus, we have the commitment and the obligation to preserve them. Due to the above, it is forbidden to use them for personal benefit or for purposes not related to work.

At Hoteles City Express, we have the obligation and responsibility to avoid putting at risk of abuse or misuse, loss, theft, damage, destruction, misappropriation, alteration, all the objects that we have within our reach within this company.

The Directors' Offices, Assistant Directors' Offices, Managements, as well as the supervisors, as the case may be, have the obligation to confirm that the staff under subordinated to them have the necessary elements and tools perform their work. Also, as employees, we must report to our immediate boss about any need that we have for the adequate performance of our duties.

### i) Use and management of the confidential information

All of us who work at Hoteles City Express, during the daily performance of our activities and duties, have the responsibility and obligation to make good use of the information

of the company and its subsidiaries with which we work (commercial, business, labor, among others), also including the information of employees, suppliers, shareholders, investors, customers, guests and the information that we receive due to the nature of our operations.

Besides safeguarding the information that we work with, we have the obligation to take greater care in case it is confidential information, which is non-public information and that, in the event of being disclosed, could give the company a disadvantage. It is strictly prohibited to share such information with staff of Hoteles City Express not related to their respective duties and much less with persons external to the company, unless it has been duly authorized in writing by the director of the corresponding area, establishing the purpose or need, or when it may be required by law.

The disclosure of confidential information either carelessly or intentionally; as well as using it for personal benefit or of any third party, will produce internal or even legal penalties (civil and/or criminal).

Any public statement on any aspect of Hoteles City Express must be coordinated, approved and issued through the

area in charge of the public relations of the company or investor relations. The purpose is to guarantee that any public or internal communication is objective, is in favor of our interests and those of our shareholders and/or investors, does not contain any false or deceitful information and meets all the legal provisions and the established internal regulations.

In case there is any doubt about the handling of confidential information, the employee should consult with his or her immediate superior or the Legal Department of the Company.

#### j) Use of information technology

Our technological resources at Hoteles City Express (internet, intranet, wireless networks, email, telephone, fax, etc.) are exclusively for the performance of our duties as employees; consequently, it is forbidden to use them in such a manner that may generate abuse and distraction in the performance of our duties and responsibilities.

Use will only be made of the authorized systems and of those having the respective use licenses. It is strictly prohibited to install, use or distribute any kind of non-authorized software

that may affect the security of our systems and that may allow the entry of viruses or cyber-intruders. It is strictly prohibited to make copies that are not duly authorized.

At Hoteles City Express, it is strictly forbidden to use technological resources to distribute communications that could contain offensive or defamatory messages, damaging the reputation of other employees, collaborators, suppliers, shareholders, investors, customers, guests, competitors and persons or companies with which we have business relations, which directly has an impact on the reputation of Hoteles City Express; therefore, we must always avoid it.

#### k) Issuance of truthful and timely information

At Hoteles City Express, we act with honesty and integrity upon issuing the reports related to the results of the operation, financial activity, quality and safety reports, as well as any report derived from our business operation, our daily activities, abiding by the applicable laws, internal rules and regulations.

All of us that work at Hoteles City Express

have the commitment and the responsibility to contribute accurately to the information that we generate, mainly the one that is sent to the public entities that by law we have the obligation to submit on a regular basis.

The inaccuracy or lack of transparency of our financial information can generate that we become liable to legal penalties, besides affecting the trust of our guests, customers, shareholders and/or investors; as well as seriously damage our reputation.

At Hoteles City Express, it is forbidden to falsify or distort records, information or documents related to the daily duties or responsibilities, regardless of their nature; the recorded information must be accurate.

The recording of non-existent matters, regardless of their nature, the forgery, manipulation or misuse of false information will be considered fraud.

## V. Disclosure and Compliance

It is responsibility of Hoteles City Express to make sure that the rules of conduct and ethical principles contained in this Code of

Ethics are duly and timely disclosed to its employees, through the delivery of a copy of this Code to each employee, obtaining acknowledgment of receipt. Hoteles City Express must, in turn, timely disclose to its employees the modifications to be made to this Code.

Likewise, Hoteles City Express agrees to provide the means to report actions of infringement, in such a manner that those who report them do not suffer the consequences of doing so.

It is responsibility of Hoteles City Express that the areas of development and operations disclose this Code and its modifications to its collaborators, obtaining acknowledgment of receipt.

## VI. Ethics Committee

The Ethics Committee of Hoteles City Express is the body in charge of supervising compliance with our Code of Ethics, and its main duties and responsibilities are the following:

- Supervise and evaluate the adequate compliance with the Code of Ethics.
- Receive, analyze and investigate all the reports related to infringements to the Code



of Ethics that are received through the means of complaint established in this document.

- Provide the means of complaint that are necessary and suitable so that employees may report any infringement to the Code of Ethics.
- Take the steps necessary to protect the confidentiality and the security of the complainants encouraging that they express themselves freely without any fear of reprisals, dismissals or discriminatory treatment.
- Identify and determine the applicable actions due to: (a) noncompliance with the Code of Ethics; (b) failure to report observed infringements; or (c) the lack of cooperation or the obstruction of the related investigations.
- Inform the Board of Directors as well as the CEO of Hoteles City Express about any noncompliance with the Code of Ethics and on any conflict of interest, as it may deem it relevant or convenient.

The Ethics Committee will be made up by, at least five (5) members designated by the majority of the members of the Board of Directors of Hoteles City Express,

preferably among officers of each of the following areas: legal, internal audit, human capital, operations, development, marketing and franchise, administration and general management. Said committee will also have a secretary who may be or not one of its members.

## VII. Consequences of noncompliance

Failure to comply with the principles and obligations provided for in this Code of Ethics or request that third parties fail to comply with them; as well as failure to report observed infringements and failure to cooperate or obstruct the related investigations, will be subject to the applicable penalties as appropriate.

The Ethics Committee may impose, among others, the following disciplinary penalties for infringements to the Code of Ethics, which will depend on the seriousness of the behavior or omission:

- **Written Warning**

If the Ethics Committee concludes that the conduct or omission represents a minor fault, this will send a warning in writing to the employee. If an employee receives three (3) warnings of this kind, Hoteles City Express may terminate the contract with just cause.

- **Termination of the Agreement**

Notwithstanding the foregoing, the Ethics Committee may terminate immediately and without any previous notice, with just cause, any contract with an employee in those cases in which the conduct or omission of said employee is qualified as serious by the committee, regardless of the applicable legal consequences.

## VIII. Means to report infringements to the Ethics Committee

Hoteles City Express makes available to its employees and to those persons interacting with Hoteles City Express, an independent communication channel to make complaints due to irregularities and any infringement to this Code of Ethics in an anonymous and confidential way through the following means:

### TELEPHONE CHANNEL

Mexico: 01-800-123-3312  
Colombia: 01-800-752-2222  
Costa Rica: 0-800-054-1046  
Chile: 800-835-133

### WEB

Enter [www.resguarda.com](http://www.resguarda.com)  
and then click on

**REPORT HERE**

### MAIL

[denuncias.hotelescity@resguarda.com](mailto:denuncias.hotelescity@resguarda.com)

Hoteles City Express has a conscience that the values constitute an essential and indispensable part of the life and the culture of the company; therefore, it takes seriously any notice about inadequate conducts detected inside the organization. The members of the Ethics Committee will take care at all times of the anonymity and the security of the complainants.

Under no circumstances anyone will be fired, suspended, threatened, harassed, his or her right to employment will be interfered, or otherwise discriminated against for providing information, assisting in providing information, or collaborating in an investigation where there is alleged noncompliance with any provision of this Code.

## IX. Special Considerations

Besides regulating our labor conduct, this Code has as purpose to reach a culture of business ethics that may be an example in our country.

It should be mentioned that this document does not contemplate all the situations that may arise in our labor environment; thus, its content may be considered similar to the requirements of the laws in force.

Lastly, we must have in mind that if any situation that we face in our daily work may lack of a specific ethical guideline, we expect that all of us at Hoteles City Express apply to such circumstance a criterion based on universal ethical principles.

**Date of issuance:  
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