

Integrated policy

Quality – Anti-bribery – Security management

Silva Herzog Consorcio Aduanal, S.C., has the firm commitment to provide integral foreign trade customs services that comply with customer requirements, legal requirements and applicable anti-bribery laws, with respect to their merchandise orders, our commitment is to ensure the satisfaction of our customers, prohibit bribery, [supply chain security and Authorized Economic Operator Program to protect the flow of domestic and international trade from criminal activities](#), through continuous improvement and effectiveness of our integrated management system.

This policy is visibly endorsed by the director.

For a culture that prohibits bribery. Express your concerns or report without fear of reprisal, any unethical conduct by our staff at the following e-mail addresses: claudio@shca.com.mx or selene@shca.com.mx

Gift, hospitality, donation and similar benefits policies

It is not recommended to offer or accept any gift or offer from any person with whom **Silva Herzog Consorcio Aduanal S. C.** conducts business. If the gift or offer is of significant value, accepting it may create an apparent conflict of interest. It may suggest or lead to the inference that the gift giver will receive favorable or preferential treatment, such as purchase orders or better prices, terms or conditions of sale.

Under no circumstances shall any director or employee or third party of **Silva Herzog Consorcio Aduanal S. C.** offer, promise, give or authorize the giving of money or anything of value to any government official, in any of the jurisdictions where we operate, or to any third party while knowing or aware of the likelihood that the money or thing of value will be passed to a government official, with the intent to influence him in his official capacity for the purpose of obtaining or retaining business or obtaining a business advantage for Silva Herzog Consorcio Aduanal S. C.

This policy extends to vendors, suppliers and customers, as well as entities or individuals currently doing business with any **Silva Herzog Consorcio Aduanal S. C.** entity or seeking to do so.

Generally acceptable gifts are:

- ✓ Infrequent and of a value that is not excessive; and
- ✓ Small enough for you or the company to talk about without feeling awkward.

Gifts received from suppliers are raffled with personnel.

Never offer or receive gifts from a Mexican or foreign government official.

The gifts allowed by **Silva Herzog Consorcio Aduanal S. C.** to the client are promotional items that carry the **Silva Herzog Consorcio Aduanal S. C.** logo or you may give gifts to clients that do not carry advertising, for example, coffee cookies or a wine or tequila, maximum cost value **\$1000 mxn**.

Donations.

Silva Herzog Consorcio Aduanal S. C. personnel are prohibited from any contribution or donation to political parties or individuals for the purpose of securing political or commercial influence on behalf of the company.

Beware of bribes

Although **Silva Herzog Consorcio Aduanal S. C.** is careful with the companies with which it does business, there is always a risk that a business associate may try to “buy a favor”, a nice way of saying bribe. Any form of bribery or improper payment is prohibited. In addition to cash payments.

If during the performance of the services provided by **Silva Herzog Consorcio Aduanal S. C.** due to the nature of the personnel of the organization we are working with:

- ✓ Bribery allegations are received.
- ✓ Risks are identified that one of our anti-bribery controls may come ineffective.

- ✓ No control has been considered.
- ✓ Information security risk or leakage of organized crime in the organization.

Notifies **Management or General Manager** and continues as instructed. The management representative continues as established in **PR - SG - 11 Procedure for investigation and analysis of bribery**.

Business relations

It is important that all relationships with suppliers, customers and other parties are based on lawful, efficient and fair business practices. Reasonable business dealings that are in the best interest of the company are permitted. Such departures must always be conducted in an appropriate and lawful manner.

Silva Herzog Consorcio Aduanal S. C. personnel are not allowed to receive payments for services from the client, payments are only made electronically on behalf of **Silva Herzog Consorcio Aduanal S. C.**

During the execution of the services, the director, managers, assistant director, chiefs and the management representative will follow up on their personnel, verify that their conduct is in accordance with these policies for gifts, hospitality, donations and similar benefits. In case of detecting any non-compliance with the anti-bribery policies, the **PR - SG - 11 Procedure for investigation and analysis of bribery must be followed**.

Doing business with government organizations

Silva Herzog Consorcio Aduanal S. C. employees or suppliers involved in sales to government customers must take the necessary steps to ensure that government-related transactions and relationships comply with all applicable laws and regulations.

Among other things, this law prohibits employees from paying bribes to any public official, government or other person (regardless of nationality or local custom) for the purpose of obtaining grants, contracts or favorable treatment for **Silva Herzog Consorcio Aduanal S. C.** or the employee. Bribes include kickbacks or other illicit payments.

If it is detected that any employee or business partner or potential business partner is involved in bribery scandals, corruption, public disqualifications, complaints or lawsuits regarding corruption and bribery, **Silva Herzog Consorcio Aduanal S. C.** reserves the right to take the appropriate steps, which may result in the termination of employment or business relations.

Accepting gifts or courtesies.

Unless more restrictive local laws or policies apply, **Silva Herzog Consorcio Aduanal S. C.** personnel may be offered gifts or courtesies from third parties. Marketing items of nominal value bearing the third party's brand or logo (e.g., pens, mugs and mouse pads, etc.) may be accepted and need not be reported.

Gifts that are permitted to be received at **Silva Herzog Consorcio Aduanal S. C.** are promotional items only.

In addition, **Silva Herzog Consorcio Aduanal S. C.** personnel should never seek or demand a gift or courtesy from a third party.

Conflict of interest

A conflict of interest occurs when we seek to obtain a personal benefit or for a third party with whom we have some kind of relationship, regardless of its nature, derived from the participation, in any of its stages, whether internal or external, of the commercial relationship derived from the respective provision of services, which may or may not be at the expense of the company and carried out by its members, customers, suppliers, business partners, collaborators and in general by all those who directly or indirectly have a relationship, whether temporary or permanent with the company. It is also considered a conflict of interest when our judgment as its members, customers, suppliers, business partners, collaborators and in general by all those who directly or indirectly have a relationship, whether temporary or permanent

with it, could be compromised by personal interests, i.e. when personal interests conflict with the interests of **Silva Herzog Consorcio Aduanal S. C.**

Silva Herzog Consorcio Aduanal S. C. urges all its members, customers, suppliers, business partners, collaborators and in general all those who directly or indirectly have a relationship, whether temporary or permanent with it, to immediately report any possible conflict of interest, including but not limited to the following:

- a) Participate in another company or organization that requires time that is not compatible with working hours.
- b) Making investments or receiving shares in companies of business partners, suppliers or competitors.
- c) Interaction between collaborators who are relatives or who have any degree of affinity or affective relationship between them, in related activities, whether or not there is the same reporting line.
- d) Not declaring the existence of family or affinity ties, as well as affective relationships with persons in companies that are business partners, suppliers or competitors of Silva Herzog Consorcio Aduanal S. C.
- e) The conditioning of a client to break commercial relations with another, as a requirement for the contracting of the service, and any others that may arise.

These **policies** are made available to all employees, partners, suppliers and customers, being delivered to staff during training and business partners to the signing of their contracts.

In addition to being published on the website **www.shconsorcioaduanal.mx**

Please remember that failure to comply with these policies will be cause for termination of business relationships.