



GRUPO HERDEZ

GIFT POLICY

Company employees may receive legal business gifts in relation to their positions within Grupo Herdez, under the condition that such gifts are not excessive in value or cost, nor in their frequency. Such gifts may not be received under the intention of influencing the business decision of the receiver.

The term “business gift”, which includes entertainment as well as gift articles in kind, is a habitual manner of strengthening business relationships and, under certain restrictions, is a valid business practice.

There are specific laws related to gifts for government employees, and Grupo Herdez’s policy in that regard is to comply with such laws. The foregoing confirms that bribery is illegal and violates this policy, independently of any complaints that, as a consequence of those laws, must be reported.

This policy means that no Grupo Herdez employee may receive gifts that violate the law, this policy or reasonable and common business practices. Therefore, employees must ensure that any gift received is not reciprocal or, due to its amount or frequency, may be considered reciprocal and that such gift may stand up to public scrutiny without damaging the reputation of Grupo Herdez. Any gift received that may violate this policy must be reported to the local Human Resources department.

Products and promotions of Grupo Herdez are appropriate as business gifts. When deciding on the convenience of providing a gift, one must take into consideration the appropriateness of such gift, given the position of the grantee within Grupo Herdez and the impact of same on the development of any business relations, that is to say, evaluate if the gift may be considered as inappropriate.

Due to the foregoing the following must be avoided:

- Giving or receiving money, or equivalent, as business gifts.
- Giving gifts to government employees as compensation for their work and not due to their authority.
- Granting or receiving entertainment gifts, such as tickets to social, cultural or sporting events, where the representative of the Company offering the gift does not accompany the gift receiver.



Héctor Hernández-Pons Torres

CEO

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