



CODE OF ETHICS AND BUSINESS CONDUCT

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Message from the Chairman of the Board and Chief Executive Officer

At CORPOVAEL S.A.B. de C.V. (CADU) we understand that our business philosophy determines the Company's strategic direction and that, within this philosophy, it is our values that guide the decisions we make day by day.

As stakeholders may see throughout this Code, quality, respect, honesty, commitment, communication, discipline and sustainability are the defining qualities at CADU, and they are the foundations on which the future of this great company is being built.

The Board of Directors and the Executive Management in CADU are committed to promoting the company's ethical culture at all levels. Thus, in CADU, we are constantly working to align ourselves with the highest standards of good corporate governance and transparency, environmental protection and social responsibility.

I am certain that this Code of Ethics will help all who work at CADU to continue living the culture that is part of who we are and will guide us to continue seeking excellence as a socially responsible company.

I wish to thank everyone who is part of CADU, but with a special mention to our workers for bringing to life the values described here. We would not be here without the efforts and drive of each one of you.

I invite all the interest groups we interact with to use the anonymous reporting mechanisms available to us to report any breaches of this Code.

It is an honor to present this document as the first step towards ensuring implementation.

Pedro Vaca Elguero

*Presidente del Consejo de Administración y
Director General de CADU*

PURPOSE OF THE CODE OF ETHICS

CADU's Code of Ethics aims to underline the principles and values that distinguish the Company and govern the daily work of all who are part of it. Keeping each of these principles in mind means evaluating how we act and live our culture both as people and as an organization.

Corporate Philosophy



VISION

To be a company recognized for its high quality standards in real estate development in Mexico, as well as for its dedication to providing the best shopping experience in the market and its commitment to corporate sustainability.

MISSION STATEMENT

To develop and market competitive and affordable housing solutions that surpass the expectations of our customers.

VALUES

At CADU we value the ability of leading fulfilling lives in every aspect. We have therefore identified a group of values that characterize the members of the CADU family and are promoted in our day-to-day dealings with each other within the Company.

VALUES

QUALITY

We seek to offer all our customers the best materials, services and products. This value is the basis of our entire planning and business strategy.

RESPECT

We recognize the dignity of each person we interact with and act in a correct, friendly and attentive manner with customers, suppliers and members of our Company.

HONESTY

We always seek to know the truth in order to act accordingly and build trust in the Company.

COOPERATION

We show genuine willingness to work with others in a respectful, kind and assertive manner to achieve common goals.

COMMITMENT

We have a moral obligation to offer our customers the best of our products and services.

COMMUNICATION

We build and use working relationships to create a network for exchanging ideas, so that there are no inconsistencies in the information that reaches our investors and to achieve satisfactory agreements for CADU.

DISCIPLINE

At CADU we perform our work in an orderly manner and seek to adhere to established processes in line with the country's and the organization's regulations.

SUSTAINABILITY

We believe in the importance of good corporate governance, corporate social responsibility and environmental protection in our operations.

Business Principles

The following principles are of great importance to CADU as they are derived from the values outlined in this section.



Co-responsibility

CADU is a company committed to social responsibility. We are therefore fully aware that through our actions we help improve the environment we all share.



Quality of our products and services

CADU works to ensure that the products and services we offer meet the highest possible quality standards.



Customer Service

Our customers are the raison d'être of our activities, so attending them well is essential if we want to have their preference. Our customers must be treated courteously and impeccably to ensure their full satisfaction.



Environmental responsibility

CADU's priority is to perform all its activities with the least possible impact on the environment. This means we not only seek to comply with the applicable legislation in this field, but also strive to be a proactive company in this area and set the example of following best practices.

SCOPE



This Code needs to be known, applied and respected by our directors, officers, workers, contractors, shareholders, investors, suppliers and anyone who has a professional relationship with CADU.

BUILDING THE CODE

At CADU we know we cannot foresee all the scenarios in which the values of our Code could be overlooked. However, we have built it based on best practices, which suggests that the Code acts as a guide for our decisions and actions. Furthermore, it is more a preventive Code than a corrective one.



CONDUCT **POLICIES**

Conduct Policies are the practical expression of CADU's values. In this section we specifically look at how.

COMPLIANCE WITH THE LAW

AT CADU we are aware of the laws that govern us in tax and labor matters, the environment, construction standards, health, safety, and anti-corruption measures, among other things. But not only do we seek to comply with the applicable laws, we are also committed to voluntarily following best practices, such as the ones contained in this Code of Ethics.





COMMITMENT TO HUMAN RIGHTS

At CADU we respect freedom of association and freedom of belief for all our workers. In addition, we declare our opposition to all forms of forced labor, discrimination and child labor.



RESPECT FOR INDIVIDUALITY

At CADU we believe that everyone deserves to be treated with dignity and respect. That is why at CADU we oppose all kinds of discrimination, regardless of whether it is based on physical features, gender, age, hierarchical level, socioeconomic level, pregnancy, disability, nationality, ethnicity, race, customs, religious beliefs, political affinities, personal convictions or any other circumstance or characteristic.



COMMITMENT TO PERSONAL DEVELOPMENT

CADU employees are entitled to: (i) perform their activities in an environment that encourages respect and promotes healthy competition for professional growth; (ii) participate in ongoing training in their field of work in order to develop their skills and competencies; (iii) express their opinions and ideas, concerns and/or comments to their immediate superiors; (iv) be recognized for their performance at work; (v) receive constructive feedback on the activities they perform; (vi) defend themselves against accusations and/or situations that threaten their physical and emotional integrity in any way; and (vii) report breaches of this Code anonymously and without retaliation.



PROMOTING A HEALTHY WORKING ENVIRONMENT

The Company strictly forbids its employees from consuming, possessing, selling, attempting to sell, transporting, distributing, or manufacturing drugs, alcoholic beverages, narcotics, or any other controlled substance, regardless of its quantity or form, during work hours and/or within the Company's facilities or vehicles.



RESPECT FOR THE DIGNITY OF EACH PERSON

CADU prohibits any form of sexual, emotional, physical or psychological harassment. It also prohibits physical violence or threats in the workplace.



GOOD DEALINGS WITH CUSTOMERS

We seek to provide each customer with friendly treatment and exemplary service, comply with the undertakings we make, provide customers with the information they need and request, and attend any requests they have and which are within our possibilities.



HONESTY AS PART OF WHAT WE DO

We are committed at all times to providing the customer with the fullest information reflecting the reality of the products and services we offer.



APPROPRIATE RELATIONSHIP WITH SUPPLIERS

Suppliers are an important part of our business model. We would therefore like to share our Code of Ethics with them. We are also committed to making timely payment for any work or services provided to CADU.



GOOD USE OF INFORMATION

Unauthorized disclosure of the Company's internal information by any means other than as may be required by the authorities is prohibited. Such information may only be provided by the areas and persons authorized by each Director.



PROTECTION OF EMPLOYEES' PERSONAL DATA

The Company retains data of people working in and for the Company for corporate, legal or contractual reasons, but restricts access to such information to authorized persons only.



PRIVACY OF CUSTOMER AND SUPPLIER INFORMATION

Business dealings with customers and suppliers and information about their past, present or future operations and/or transactions may only be used by persons authorized by the Area Director.

SAFEGUARDING OF INFORMATION, SYSTEMS AND PROCEDURES CONSIDERED PROPERTY OF CADU

All information and documents contained in software packages and in general in the systems and processes developed by people working for CADU are the exclusive property of the Company and are therefore deemed reserved and confidential information. Such information shall be treated with the utmost secrecy. CADU's employees shall not make any comments about the Company or its business activities to the media, investors, financial or industrial analysts, external consultants, or through Internet platforms or in any other public forum, without the consent of a Director or an authorized official spokesperson of the Company.

COMPLIANCE WITH RULES ON CONFLICTS OF INTEREST

A conflict of interest is any situation in which a person puts his or her interests before those of the organization (whether personal or financial). Therefore, the following actions are not permitted:

- Offering benefits to third parties or subordinates who are not authorized;
- Taking advantage of one's position within the organization to request that a rule be overlooked;
- Participating in or developing business that directly or indirectly competes or interferes with the Company;
- Accepting benefits from customers, suppliers or competitors that are not formally set forth in a contract;
- Taking advantage of one's post or position in the company to obtain personal benefits, including family members or third parties;
- Being a supplier or contractor of CADU if you or any of your relatives in the second degree of consanguinity or in the first degree of affinity are a worker.

Employees who have a family member linked to the Company after this Code of Ethics becomes effective must inform the Ethics Committee.

COMPLIANCE WITH RULES ON GIFTS

CADU personnel shall neither accept nor offer any gifts, economic or non-economic benefits, refunds, or entertainment to/by third parties that may constitute a violation of the law or affect the performance of work relevant to the Company or a third party.

1 These actions are given as examples and are not limitative.



COMBATING CORRUPTION AND BRIBERY

CADU personnel shall not request, offer or accept (directly or indirectly) any kind of economic, social, material or other incentives to/from representatives inside or outside the Company in order to obtain a benefit for themselves, for someone close to them or for the Company itself.



TRUTHFUL FINANCIAL REPORTING

CADU personnel responsible for financial reporting must report accurately and truthfully. Any act or omission resulting in misinterpretation of financial information shall be avoided.



CARE OF THE COMPANY'S ASSETS

Any person with access, use, authority or express authorization to dispose of the Company's assets, as well as its records, merchandise, cash, securities and material of restricted use, is personally responsible for their custody. The Company's assets shall not be used for personal benefit or for any unauthorized purposes. When an employee ends their employment relationship with CADU, they must return all the Company assets that were provided to them to help them with their work, including documentation and any other formats containing Company information.



OPERATION FREE OF POLITICAL AFFINITIES

It is expressly forbidden to proselytize in any manner in and around the places of work, both during and outside Company working hours. CADU does not have exclusive affinities with any political party; it operates for the country's benefit only.



MANAGEMENT OF INFORMATION SYSTEMS AND COMPUTER EQUIPMENT

It is essential for equipment, software and systems, as well as data access, processing and storage, to be adequately safeguarded and used exclusively for authorized purposes.



ENVIRONMENTAL PROTECTION

At CADU we are committed to working actively to minimize damage to the environment, reduce pollution by our products, comply with legal requirements in this field and promote environmental awareness in the communities we operate in.

What should a CADU worker do?

All CADU workers must:



Be familiar with this Code of Ethics.

Note: Failure to read or sign this Code shall not release employees from the obligation to comply with it.



Comply with this Code of Ethics.



Foster the implementation of the Code.



Request clarification (in case of doubt) regarding possible situations that breach or could breach the Code.

Note: Workers may go to their immediate superior or send an e-mail to CADU's Ethics Committee.



Use the CADU-DENUNCIA System

To report any conduct, irregularity or indication that could result in a breach of this Code.



Assist Investigations

Conducted by the Ethics Committee and/or the people in charge of resolving a case.



Be role models

And project the Company's image by providing a good example both on and off the premises.

Ethics System

CADU-DENUNCIA System – A whistle-blower mechanism

The CADU-DENUNCIA System is a confidential channel of communication through which any breach of CADU's Code of Ethics can be reported. **CADU-DENUNCIA's** aim is to resolve any complaints received with the help of the Company's Ethics Committee.

Confidentiality and non-retaliation

Anonymous reports will be received and the confidentiality of each report will be respected. CADU will follow a non-retaliation standard for all complainants reporting a breach of the Code in good faith.

Ethics Committee

The Ethics Committee is a body appointed by the Company's Board of Directors. It will be in charge of:

- Promoting awareness and the implementation of the Code of Ethics in the company;
- Acting as an advisory body on situations or circumstances that could affect business ethics;
- Analyzing and resolving complaints received in the **CADU-DENUNCIA System**;
- Guiding and assisting any necessary internal or external investigations;
- Reporting on the development of the Ethics System to the Board of Directors quarterly.





CORPORATE GOVERNANCE
CORPOVAEL S.A.B. DE C.V.
CODE OF ETHICS
www.caduinmobiliaria.com