

# **Conflicts of Interest Policy**

**FIBRA DANHOS** 

ADMINISTRADORA FIBRA DANHOS



# INTRODUCTION

Fibra Danhos (FD) is a Mexican Real Estate Investment Trust (REIT) established primarily to develop, own, lease, operate and acquire iconic and premier quality real estate assets in Mexico.

Administradora Fibra Danhos (AFD) is a subsidiary company of Fibra Danhos (FD), which, through a Management Agreement, and in accordance with the instructions of the Trust Technical Committee, is empowered to carry out all the necessary or convenient acts for the fulfillment of the Trust's purposes, including the hiring of personnel and contractual relationships with suppliers and service providers.

#### OBJECTIVE

Establish the action guidelines that AFD personnel, relevant executives and directors must follow in their activities and decision-making in situations that may generate a conflict of interest.

# IDENTIFICATION AND TREATMENT OF THE CONFLICT OF INTEREST

#### Situations in which a conflict of interest may arise

A conflict of interest rises when a collaborator has, in a private capacity, situations that could unduly influence the correct way of exercising their functions and responsibilities.

#### Situations in which a conflict of interest may arise (expository and non-limiting)

- a. When a person uses their position to influence a decision providing funding or contracts to another with whom they have an interest.
- b. When a person uses their position to employ an acquaintance or family member outside of the established hiring process.
- c. When a person requests or accepts some type of benefit in exchange of influencing the activities, decisions or contracts of FD and AFD or promoting the interest of someone else.
- d. When a person uses information or intellectual property to which that person has access within their workplace or remotely, for personal gain.



- e. When the activities of collaborators outside the workplace are inappropriate and conflict with the interests of FD/AFD.
- f. The acceptance of improper benefits such as significant gifts that compromise or force the return of said action.
- g. Situations in which AFD, through its personnel, has access to non-public information about clients or suppliers that places it in an advantageous position with respect to other market participants.
- h. When a collaborator uses confidential or privileged information of FD/AFD for their own benefit or that of a family member or it is transferred to another entity with which there is a participatory link.
- i. When a collaborator manages his own business and maintains relations of any kind with FD and AFD seeking to obtain a personal benefit.
- j. When an employee is involved in an outside activity that is so time-consuming that it affects their ability to devote time and attention to their current job responsibilities.
- k. When a collaborator or relative of the same has some participation or relationship with a competitor, supplier, contractor, service provider of AFD and FD, or even FD lessee seeking to obtain a personal benefit.
- I. When a relative of a collaborator works with a government or regulatory authority seeking through it to obtain some personal benefit for FD and/or AFD.
- m. When a collaborator receives or offers gifts that are outside the established guidelines.

# PREVENTION OF CONFLICT OF INTERESTS

Measures will be designed and implemented to:

• Disseminate this Policy to FD/AFD collaborators and ensure that the content has been understood.



- Provide training on how to identify and what to do in situations where a conflict of interest exists or may arise.
- Make known the channels through which a situation that is not aligned with the provisions of this Policy can be reported.
- In the event that a family member presents themselves as a candidate for a position, the AFD collaborator with whom they maintain a relationship may not intervene in the hiring or internal promotion process. The selection or promotion of people will always be carried out under strict terms of objectivity and the most suitable candidate will always be selected in accordance with the personnel selection and integration policy.

# Communication regarding conflicts of interest

It is the responsibility and obligation of FD/AFD collaborators to report if there is any type of conflict of interest in current or potential business relationships with tenants, suppliers, contractors, service providers or any other agent with which FD/AFD establishes any kind of commercial, economic, or social relationship.

The corresponding internal areas must analyze the information, investigate the situation and determine and implement the most appropriate action regarding the potential conflict of interest; where appropriate, with the approval of the AFD management areas.

#### Treatment or management of situations in conflicts of interest

There will be situations in which it is necessary to establish a commercial or business relationship despite presenting a conflict of interest. Said situations must be declared to the management areas of AFD and it is necessary to ensure transparency through the declaration and documentation thereof.