

LATINUS MEDIA GROUP LLC
INTEGRITY POLICY DURING THE 2023-2024 ELECTORAL PROCESS: A TRANSPARENT APPROACH TO
COMMUNICATION

CONSIDERING

FIRST. OUR STANCE ON THE 2024 MEXICAN ELECTORAL PROCESS. As we approach the electoral process and voting days in Mexico during 2024, the responsibility and role of LATINUS MEDIA GROUP LLC in the national and international narrative become even more critical. This electoral process is undoubtedly one of the most significant in recent Mexican history, with an unprecedented number of elective positions at stake. The magnitude of this election, combined with the rapid developments in the field of communication, presents unique challenges that require our immediate attention and full commitment.

Our duty as a media organization is not simply to inform but to ensure that every piece of information we convey is done with integrity, accuracy, and, above all, impartiality. In this amplified scenario, any deviation, however minimal, can have wide-ranging implications, affecting the electorate's perception and, ultimately, the integrity of the electoral process. Mexican society observes us and trusts us to be a beacon of truth in a sea of potential distortions.

Beyond our commitment to the audience, it is imperative to acknowledge and comply with the current electoral legislation. The legal framework sets clear guidelines and expectations for how media organizations should operate during this period. Having a robust policy to prevent corrupt practices is, therefore, not only a matter of journalistic integrity but also of legal compliance. Neglecting this aspect or being negligent can have legal, financial, and reputational consequences for our company.

For all the reasons mentioned, we have designed and are implementing a comprehensive policy focused on preventing corrupt practices during the Mexican electoral process. This policy is not just a document; it is a statement of our mission and values in action. It is a guarantee to our stakeholders, Mexican society, and ourselves that our company will act with the highest degree of integrity and professionalism during this crucial period for the nation.

SECOND. INTEGRITY AND CORPORATE REPUTATION IN THE 21ST CENTURY: THE PILLAR OF OUR SUSTAINABILITY AND PROJECTION. The digital age and the globalized economy have drastically redefined the concept of corporate reputation. It is no longer just about how we are perceived in a local market but how we are seen and valued in a global arena. For LATINUS MEDIA GROUP LLC, our reputation is the tangible reflection of several years of effort, dedication, and commitment to excellence. It is the most valuable and fragile asset we possess, meticulously built over time but susceptible to threats in an instant in our age of instant information.

In the media sector, this asset is even more critical. Our core value does not lie in equipment or infrastructure but in the public's trust. Integrity is the core of that trust. Every decision we make, every story we cover, and every partnership we form must be imbued with this unwavering integrity. Without it, we not only risk losing our audience but also erode the fundamental pillar upon which our organization is built.

However, there is an additional dimension to consider: Reputation is not only a defensive matter but also a strategic opportunity. A strong reputation opens doors to deeper collaborations, attracts top talent, and positions us favorably in negotiations and market opportunities. In a saturated media ecosystem, reputation becomes our most powerful differentiator, a competitive advantage that allows us to stand out and lead.

For all the reasons mentioned, it is essential that senior management understands and prioritizes the preservation and strengthening of our reputation. It is an investment in our future, insurance against market volatilities, and, most importantly, a commitment to our audience, our collaborators, and the very history of LATINUS MEDIA GROUP LLC.

THIRD. LEGAL COMPLIANCE IN A GLOBALIZED SCENARIO: AN UNAVOIDABLE IMPERATIVE. In the complex fabric of the global economy and cross-border commercial interactions, anti-corruption laws and regulations are not mere recommendations but essential mandates that dictate our ability to operate, grow, and compete in the market. These laws, both national and international, are being reinforced, and their enforcement has intensified, demonstrating an irreversible trend toward transparency and corporate integrity.

As LATINUS MEDIA GROUP LLC seeks to expand its influence, strengthen alliances, and enter new markets, it is imperative to understand that legal compliance is not just a line item in our responsibility balance. It is a clear statement of our ethical stance and a tangible display of our commitment to integrity and transparency values. Organizations that

fail to comply with these mandates not only face significant financial penalties but also reputational damage that can be irreparable, affecting the trust of investors, partners, and the general public.

Last but not least, robust legal compliance translates into a competitive advantage in the current corporate climate. In a market where ethics and corporate responsibility are increasingly valued, our proactivity on this front will position us as leaders, not only in the media industry but also in the realm of global corporate engagement. Indeed, it is imperative that from the highest levels of leadership, we recognize, support, and prioritize this stance, thus solidifying our position in the future of the global market.

FOURTH. COMMITMENT TO DEMOCRACY AND SOCIAL RESPONSIBILITY: A MISSION BEYOND BUSINESS. In the epicenter of the contemporary business landscape, where companies not only generate economic value but also social value, LATINUS MEDIA GROUP LLC has an intrinsic duty to go beyond mere profitability. We are the custodians of one of the most fundamental pillars of our society: Information. In this role, our Corporate Social Responsibility (CSR) and commitment to democracy are not marginal aspects but essential parts of our identity and purpose.

In our sector, the media industry, we possess unique power and responsibility. We are influencers, educators, and, in many cases, the primary source of knowledge for millions. In this context, any act of corruption or ethical deviation not only tarnishes our reputation but can also compromise the very fabric of democracy. Therefore, a steadfast commitment to ethics and integrity is not an option; it is a duty.

As we progress into the 21st century, democracy globally faces unprecedented challenges. Fake news, misinformation, and polarization threaten its stability. LATINUS MEDIA GROUP LLC has the opportunity and, indeed, the obligation to be a beacon of trust, objectivity, and transparency. Our CSR must reflect this by ensuring that we promote quality journalism and uphold democratic values in every action we undertake.

Additionally, our responsibility to democracy provides us with a competitive advantage. In an era of skepticism and distrust of the media, our ethical stance and unwavering commitment to the truth set us apart. This translates into audience loyalty, brand strength, and, ultimately, business sustainability.

It is essential that from the highest levels of our organization, we recognize that our commitment to democracy and CSR is not a mere accessory to our business strategy. It is the very essence of who we are, the legacy we leave, and the lasting impact we will have on society.

FIFTH. FINANCIAL AND OPERATIONAL SUSTAINABILITY: THE NEXT FRONTIER IN BUSINESS EXCELLENCE. We live in a world where adaptability and resilience are more than virtues; they are imperatives. In LATINUS MEDIA GROUP LLC, our past achievements do not guarantee our future success. It is anticipation, foresight, and preparation that keep us at the forefront. In this equation, financial and operational sustainability emerges as a critical factor, intrinsically linked to our ethical performance.

Ethics is not simply a matter of morality; it has tangible and quantifiable ramifications in our daily operation. A corporate environment that embraces and promotes ethical practices significantly reduces the risks of sanctions, fines, and litigation. These not only have direct financial costs but can also divert valuable resources, time, and attention from our primary objectives. In an industry as competitive as ours, we cannot afford to be reactive; we must be proactive.

Beyond the tangible risks, financial and operational sustainability is also enhanced by market and stakeholder perception. A clean, transparent, and ethical track record strengthens the trust of investors, shareholders, and business partners. This trust is essential to maintain and expand our access to capital, negotiate favorable terms, and explore new business opportunities.

Moreover, an ethical corporate culture also enhances our operational efficiency. Teams working in a transparent and fair environment feel more motivated and engaged. Productivity, innovation, and collaboration flourish in an environment where each individual knows they are playing on a level playing field, and their contributions are valued.

It is essential to understand that financial and operational sustainability is not a destination but a journey. It requires constant vigilance, adaptation, and, above all, leadership. The vision and commitment to this journey will not only determine the course of LATINUS MEDIA GROUP LLC but also its legacy in the industry. Our future in terms of profitability, growth, and reputation is intrinsically linked to how we navigate this path and is placed at the top of our corporate priorities.

SIXTH. OUR VITAL ROLE IN ELECTORAL PROCESSES: CUSTODIANS OF DEMOCRACY AND A NATION'S CONSCIENCE. In the global landscape of influences, few institutions possess the power and responsibility that falls upon media organizations, especially during election seasons. In LATINUS MEDIA GROUP LLC, we are much more

than mere conveyors of information; we are a crucial link in the chain of trust, transparency, and civic responsibility that underpins each vote.

Election processes are not just democratic exercises; they are decisive moments in a nation's narrative. During these times, the masses seek not only news but also clarity, direction, and reliability. The integrity with which we approach our work during these times not only reflects our professional ethics but also our contribution to strengthening democracy. Every story we tell, every piece of data we verify, and every voice we elevate has a direct impact on the quality of decisions made by our audience at the ballot box.

The world is watching, and the digital age has amplified the lens through which we operate. The risks of compromising our neutrality, yielding to external pressures, or failing in our due diligence could not only tarnish our reputation but could have geopolitical repercussions. However, beyond the risk, there is the reward: unwavering respect from a grateful nation and global recognition for upholding the gold standard in journalism during critical times.

The responsibility that comes with our position during electoral processes is immense. But so is the opportunity. By standing firm in our values and principles, we not only strengthen faith in the democratic process but also solidify our position as leaders and pioneers in the media industry.

At LATINUS MEDIA GROUP LLC, we will not underestimate the magnitude of our role in these crucial moments. We are custodians of the truth, guides in the storm of information, and bulwarks against misinformation. This is a responsibility that must be embraced, protected, and promoted from the top, ensuring that every member of our team understands and aligns with our transcendent mission.

SEVENTH. CORPORATE INSTRUCTION. In this context, the company, through the Operating Agreement issued on the 18th day of September 2023, by Mr. Christian González Guadarrama, in his capacity as Chief Executive Manager of LatinUs Media Group LLC, with the powers stated in points (4.3) and (4.4) of the initial agreement of incorporation of the aforementioned company, dated January 13, 2020, in the State of Delaware, United States of America, under registration number 7797248, issued the respective agreement that will govern the company's operations in the present and future unless modified by agreement of the partners, regarding the establishment of an INTEGRITY POLICY DURING THE 2023-2024 MEXICAN ELECTORAL PROCESS, which will be directed to the company's workers, as well as anyone working with them or representing the company directly or indirectly, the general public, and individuals without appointments such as individuals providing social service, contracted personnel, and subcontracted individuals.

EIGHTH. LEGAL FRAMEWORK. This document is in accordance with the applicable regulatory framework in Mexico, in compliance with Articles 1, 4, and 41 of the Political Constitution of the United Mexican States, as well as the General Law of Electoral Institutions and Procedures (LGIPE) and the General Law of Political Parties.

NINTH. GENERAL OBJECTIVE. This document has the general objective of establishing the guidelines to prevent, detect, and address acts contrary to the applicable legal framework within LATINUS MEDIA GROUP LLC during the 2023-2024 Mexican electoral process. It recognizes the responsibility to operate with integrity and transparency in all our businesses and activities.

As a result, the following INTEGRITY POLICY DURING THE 2023-2024 ELECTORAL PROCESS is issued, which will be strictly applicable to the company's workers, as well as anyone working with them or representing the company directly or indirectly, the general public, and individuals without appointments such as individuals providing social service, contracted personnel, and subcontracted individuals.

CHAPTER I GENERAL PROVISIONS FIRST SECTION GENERALITIES

1. Definitions. For the purposes of these policies, the following terms shall be understood as:

- **Corruption:** The act of offering, giving, receiving, or requesting, either directly or indirectly, tangible or intangible benefits, money, or any object of value, including but not limited to favors, economic benefits, exclusive access, preferential coverage, or promises of future actions, with the intent to influence, manipulate, alter, or bias the content, tone, frequency, or nature of interviews, reports, advertising, analysis, opinions, or any other form of communication of a similar nature, with the purpose of benefiting or harming a political entity, candidate, precandidate, or party at the expense of fair, equitable, and objective information, thereby affecting the citizens' right to be adequately informed and undermining the integrity and credibility of the company.

- **Candidate(s):** Citizen(s) who obtain, from the respective electoral authorities, the registration agreement as such for a position and/or elected office, whether independently, through political parties, coalitions, or similar figures provided for in the applicable electoral legislation.

- **Precandidate(s):** Citizen(s) in the deliberative process of their political party, coalition, or similar figures provided for in the applicable electoral legislation, to obtain their nomination for a position and/or elected office.

- **Due Diligence:** It involves reasonable prevention, thorough investigation, and collaboration with federal and local electoral authorities within Mexican territory regarding any act of corruption referred to in this policy, concerning candidates and/or precandidates.

- **Company:** BGC LIMITED CONSULTING S.A. DE C.V.

- **Personnel:** The company's workers, as well as anyone working with them or representing the company directly or indirectly, the general public, and individuals without appointments such as individuals providing social service, contracted personnel, and subcontracted individuals.

- **Policy:** This Integrity Policy during the 2023-2024 electoral process.

2. Objectives. The purpose of these policies is to establish the general guidelines for preventing, detecting, and addressing acts contrary to the applicable legal framework in the company during the 2023-2024 Mexican electoral process, recognizing the responsibility to operate with integrity and transparency in all our businesses and activities.

3. The specific objectives of these policies are as follows:

- Establish specific measures to prevent corrupt behavior referred to in this policy.
- Promote awareness of existing regulations related to corrupt acts referred to in this policy.

The application of these policies shall be carried out without prejudice to compliance with the national legal order, as well as internal provisions and procedures for imposing labor or, where appropriate, criminal sanctions.

4. Scope: These policies shall be mandatory for the company's personnel, including its workers, as well as anyone working with them or representing the company directly or indirectly, the general public, and individuals without appointments, such as individuals providing social service, contracted personnel, and subcontracted individuals.

5. The department responsible for business and labor relations within the company shall be in charge of implementing these policies and promoting compliance with them. It shall also implement and monitor compliance with these policies among the company's personnel and shall be competent to investigate and sanction or report possible breaches to the competent authority.

In all matters not covered by these policies, the provisions, rules, and guidelines contained in the national and international legal framework applicable shall be observed, including, but not limited to, the Federal Labor Law, the General Law of Electoral Institutions and Procedures, as well as the General Law of Political Parties, and other applicable legislation in the field.

SECOND SECTION PRINCIPLES AND POSTULATES

6. Principles and Postulates: In the interpretation and application of the policies, the following principles and postulates must be considered:

- **Zero Tolerance:** Do not admit or tolerate the corrupt behaviors referred to in these policies.

- **Integrity:** Act with honesty and transparency in all our relationships and interactions with candidates and/or precandidates, as well as the leadership of political parties, coalitions, or similar figures provided for in the applicable electoral legislation.

- **Transparency:** Be clear in our actions and decisions, avoiding conflicts of interest in all our relationships and interactions with candidates and/or precandidates, as well as the leadership of political parties, coalitions, or similar figures provided for in the applicable electoral legislation.

- **Absolute Impartiality:** Ensure that all coverage, reports, or electoral analyses do not favor any candidate and/or precandidate, as well as the leadership of political parties, coalitions, similar figures, or political entities over others.
- **Source Transparency:** Ensure that information sources are transparent, avoiding the dissemination of unfounded or questionable origin news.
- **Equity in Coverage:** Provide equal space to all candidates and/or precandidates, as well as the leadership of political parties, coalitions, political entities, or similar figures in coverage, ensuring that all have fair access to the public.
- **Objectivity in Analysis:** Editorial analyses or comments should be based on verifiable facts and presented objectively, avoiding biases.
- **Social Responsibility:** Recognize the vital role of the media in shaping public opinion and always act for the benefit of society, avoiding any practice that could harm democracy.
- **Right of Reply Access:** Ensure that, in case of misinformation or incorrect information, affected parties have a space to rectify or clarify the situation.
- **Avoid Commercial Influence:** Ensure that editorial decisions are not influenced by commercial interests, sponsors, or advertising, especially those directly or indirectly linked to political entities.
- **Promotion of Informed Voting:** Promote electoral education and awareness by providing tools and content that enable citizens to make informed decisions.
- **Compliance with Regulations and Laws:** Strictly adhere to electoral regulations and laws, ensuring that all content and practices comply fully with the current regulations.
- **Promotion of Constructive Debates:** Promote and facilitate debate spaces between candidates and/or precandidates, as well as the leadership of political parties, coalitions, political entities, or similar figures, ensuring an environment of respect, equity, and objectivity. These debates should be designed to allow a deep discussion of each candidate's proposals and visions, fostering the exchange of ideas and constructive confrontation of viewpoints, enabling citizens to gain a clearer and more complete view of the available electoral options.
- **Free and Equitable Access:** Ensure that access to the company's controlled media for interviews, opinions, right of reply, and similar acts related to the electoral process is completely free. This guarantee aims to prevent economic interests from prevailing over the right to information and ensures that all candidates and/or precandidates, as well as the leadership of political parties, coalitions, political entities, or similar figures, regardless of their financial capacity, can convey their messages, defend their positions, or correct misinformation on equal terms. This measure reinforces the company's commitment to electoral justice and the democratic principle of equity among participants in the electoral contest.
- **Zero Hiring with Political Entities Policy:** Establish and maintain a strict policy of not hiring or engaging in economic transactions with candidates and/or precandidates, as well as the leadership of political parties, coalitions, political entities, or similar figures, regarding the dissemination of electoral platforms, political messages, interviews, opinions, right of reply, and other similar acts. This position ensures that the company is not influenced by financial incentives that could compromise its objectivity and fairness during the electoral process. It reaffirms the company's commitment to editorial independence and ensures that the information and coverage provided is based solely on journalistic criteria and not on commercial agreements or financial interests.

**CHAPTER II
PREVENTION OF BEHAVIORS CONTRARY TO POLICY
FIRST SECTION
SPECIFIC PREVENTION ACTIONS BY THE COMPANY**

7. Company Actions: The company will take preventive actions to deter through the following actions:

- **Continuous Dissemination:** Implement regular dissemination to all personnel on the importance and application of the basic principles, with an emphasis on non-compliant behaviors, ensuring that each individual fully understands their responsibilities.
- **Reporting Mechanisms:** Establish confidential and secure channels where employees can report any suspicion or evidence of policy violations without fear of reprisals.

- **Active Monitoring:** Regularly supervise and audit the production of content and activities related to electoral coverage to ensure adherence to the established principles.
 - **Content Review:** Implement, when conditions allow, a pre-publication review process for any content related to the electoral process, ensuring adherence to basic principles.
 - **Continuous Feedback:** Establish mechanisms for regular feedback with the personnel, allowing them to express concerns, ask questions, and receive clarifications regarding the application of the policies.
 - **Transparency with the Public:** Regularly communicate the company's policies and principles to the public, reaffirming the commitment to impartial and equitable coverage. Also, be transparent about any potential conflict of interest.
 - **Relations with Political Entities:** Establish clear protocols for interaction with political parties, candidates, and their representatives, ensuring that all communications and dealings are conducted transparently and in accordance with the policies.
 - **Periodic Review and Update:** Conduct annual reviews of the policies and procedures to identify areas for improvement, adapt to new challenges, and ensure their relevance and effectiveness in the current context.
8. The area responsible for business and/or labor relations within the company will plan, execute, and evaluate the specific actions contained herein.

SECOND SECTION SPECIFIC PREVENTION ACTIONS BY PERSONNEL

9. Among other similar actions, the company's personnel, as well as anyone holding positions, commissions, or functions on behalf of the company, must refrain from, in relation to these policies:
- Exerting Political Violence on Any Candidate and/or Precandidate;
 - Conditioning the dissemination of electoral platforms, political messages, interviews, opinions, right of reply, and other similar acts, through any act or deed of corruption referred to in this policy;
 - Showing preference, favoritism, or bias toward any candidate and/or precandidate, as well as the leadership of political parties, coalitions, political entities, or similar figures in their public communications and daily work;
 - Using or disseminating information from an unknown, unverifiable, or dubious source;
 - Providing disproportionate or inequitable coverage to any candidate and/or precandidate, as well as the leadership of political parties, coalitions, political entities, or similar figures, to the detriment of others;
 - Refraining from making or disseminating comments that incite hatred, violence, or division among any candidate and/or precandidate, as well as the leadership of political parties, coalitions, political entities, or similar figures;
 - Engaging in acts that undermine the social purpose and commitment of the company, including defamation or misinformation;
 - Obstructing or intentionally delaying the right of reply of a candidate and/or precandidate, as well as the leadership of political parties, coalitions, political entities, or similar figures, who request corrections of incorrect information;
 - Allowing commercial or advertising agreements to influence editorial decisions or decisions regarding electoral coverage;
 - Discouraging voting or promoting abstention without a clear and truthful informative basis;
 - Engaging in practices that violate electoral regulations or encouraging or collaborating with third parties who do so;
 - Avoiding or obstructing the organization of debates between candidates and/or precandidates, as well as the leadership of political parties, coalitions, political entities, or similar figures, or favoring some over others in these spaces;

- Requesting or accepting any type of compensation or benefit for providing or ensuring space or time in the company's informative spaces for a candidate and/or precandidate, as well as the leadership of political parties, coalitions, political entities, or similar figures;
- Establishing financial agreements or receiving benefits from candidates and/or precandidates, as well as the leadership of political parties, coalitions, political entities, or similar figures, in relation to electoral coverage;
- Making verbal expressions such as insults or threats about any candidate and/or precandidate, as well as the leadership of political parties, coalitions, political entities, or similar figures; and
- Displaying or disseminating through any means: posters, calendars, messages, photos, posters, illustrations, or objects with sexual images or structures about any candidate and/or precandidate.

CHAPTER III PLANNING, EXECUTION, EVALUATION, AND FOLLOW-UP

- 10.** Any person may report any non-compliance by company personnel to the company's human resources department, in case they identify any member of the company's personnel as a potential offender.
- 11.** Reports will be received through the email address designated by the company, directly at its offices, or through the external reporting hotline that is established, ensuring the confidentiality of information and the protection of the reporter.
- 12.** Reports must contain details regarding the mode, time, and place, as well as data that allows the identification of the potential offender.
- 13.** The department responsible for business and/or labor relations within the company will carry out the planning, execution, evaluation, and follow-up of the specific actions contained herein.
- 14.** For internal purposes of the company and the handling of cases not foreseen in these policies, interpretation and attention will be the responsibility of the company's management.

CHAPTER IV PERIODIC REVIEW AND UPDATE

- 15.** The department responsible for planning, execution, evaluation, and follow-up within the company of the policies must periodically carry out the following actions:
 - **Review Calendar:** Establish a fixed annual calendar for policy reviews, ensuring that sufficient time and resources are devoted to a comprehensive and thorough evaluation.
 - **Multidisciplinary Review Team:** Assemble a team composed of professionals from different areas of the company (legal, editorial, ethics, among others) to ensure a diverse and holistic perspective in the review process.
 - **Active Feedback:** Create mechanisms to collect opinions and experiences from employees at all levels about the implementation and effectiveness of the policies and use these insights as a basis for improvements.
 - **Benchmarking:** Research and compare policies and practices with leading media outlets at the national and international levels, identifying opportunities to adopt best practices and stay at the forefront of electoral integrity.
 - **External Consultation:** Consider the periodic inclusion of external experts in the field of elections and media to provide a fresh and expert perspective in policy review and updates.
 - **Legislative Updates:** Stay informed about any changes in Mexican electoral legislation and adjust policies accordingly to ensure ongoing compliance.
 - **Proactive Communication:** When implementing any changes, communicate them clearly and effectively throughout the organization, ensuring that every employee is aware and understands the reasons and benefits behind the updates.
 - **Archiving and Versions:** Maintain an organized record of all previous versions of policies, ensuring transparency and traceability.

- **Institutional Dissemination:** Publish an excerpt of these policies through the electronic media available to the company for the general public.

Note: Mr. Christian González Guadarrama designates Mr. Enrique Pons Franco as a special delegate to obtain, within the current year, the respective data preservation and document digitization certificate in accordance with applicable legislation; the Commercial Code; the Federal Civil Code, as well as NOM-151-SCFI-2016, "Requirements to be observed for the preservation of data messages and document digitization (replaces NOM-151-SCFI-2002), published on March 30, 2017, in the Official Federal Gazette, under the understanding that said digital document will be a faithful and exact copy of the one that will be presented to the aforementioned Certification Service Provider authorized by the Ministry of Economy in the aforementioned terms, that is, to obtain the respective data preservation certificate and/or the respective digital timestamp, and/or the corresponding digitization of this document.