



sánchez
devanny®

Business Continuity Policy





Índice

1. Overview	3
2. Roles and Responsibilities	4
3. Content	5
4. Annexes	9

■ Overview

1. Introduction

For Sánchez Devanny (“the Firm”) it is essential to ensure the continuity of our operation not only on a day-to-day basis, but also in extraordinary situations that may affect the normal exercise of our activities (“triggering events”).

This policy reflects our commitment to act quickly and effectively in any triggering event in order to guarantee the provision of our services and the fulfillment of the commitments undertaken with all our employees, suppliers, clients and business partners (“stakeholders”).

1.2 Purpose

The purpose of this policy is to establish the guidelines to determine the procedures and actions that will allow Sánchez Devanny, in the event of triggering events, to guarantee continuity in the provision of our services and in the exercise of our activities (“business continuity”), or its prompt reestablishment, as well as the mitigation of the effects of such triggering events.

Likewise, this policy refers to the tools that Sánchez Devanny has to ensure business continuity.

1.3 Scope / Applicability

This policy applies to all Sánchez Devanny employees in all of the firm’s offices (Mexico City, Monterrey and Querétaro).





Roles and Responsibilities

Board of Directors

- » Approve this policy and its updates.
- » Ensure the application of this policy and know its content and updates.

Chief Financial Officer (CFO)

- » Approve this policy and its updates.
- » Ensure the application of this policy and know its content and updates.
- » Guarantee business continuity through actions to ensure necessary cash flow.

Compliance Officer

- » Periodically review this policy and ensure its compliance and updating.
- » Obtain the necessary approvals from the Board of Directors and the CEO to comply with this policy.

Human resources manager

- » Provide support to employees on any issue related to this policy, in terms of human resources.
- » Ensure that this policy is communicated internally.
- » Request authorization from the Board of Directors and the CFO in order to take the necessary measures to ensure compliance with this policy by the employees of Sánchez Devanny.
- » Inform the Compliance Officer about any change that entails an update to this policy.

Chief Information Officer

- » Give support to employees in any aspect related to this policy for computer systems.
- » Request authorizations from the Administrative Board of Directors and the Administration and Finance Director to take the measures that guarantee compliance with this policy in those related to computer systems.
- » Inform the Internal Compliance Officer about any change that implies an update of this policy.



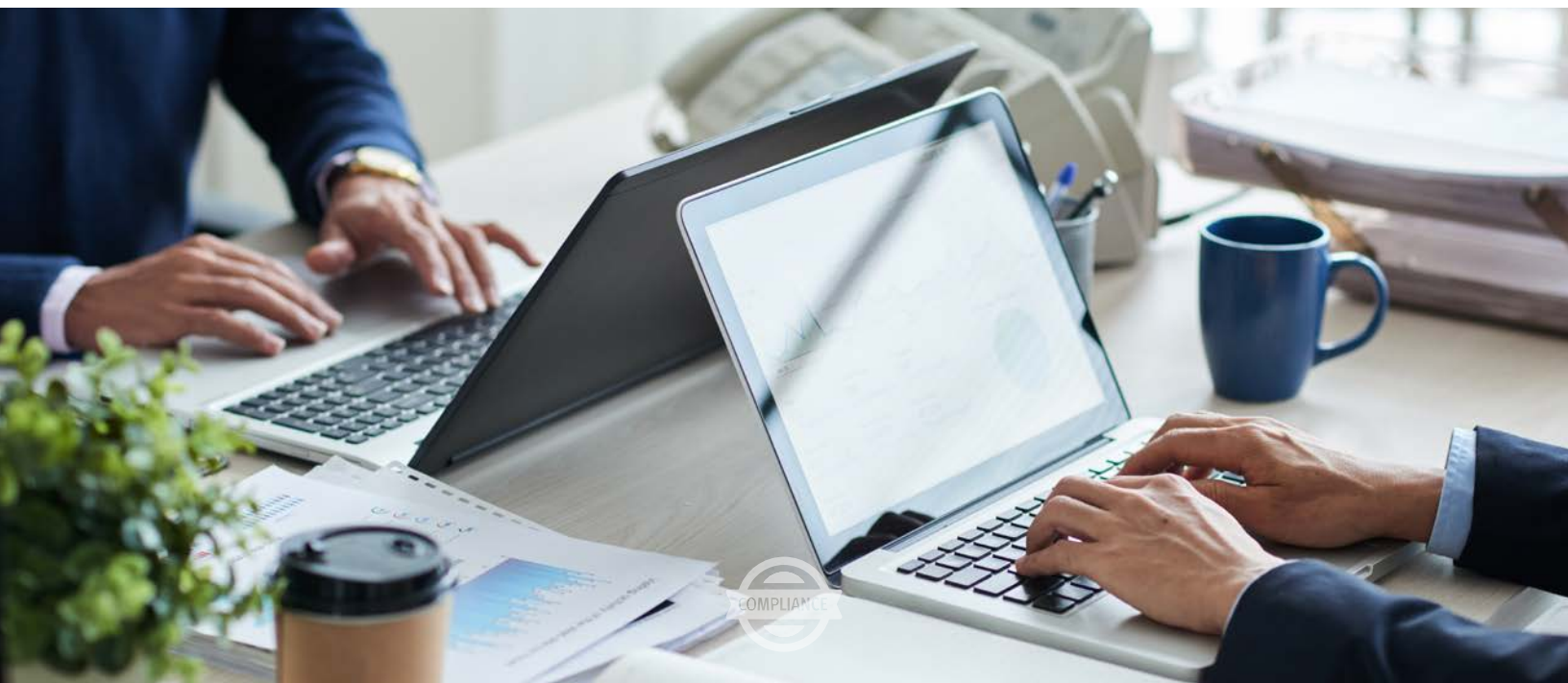
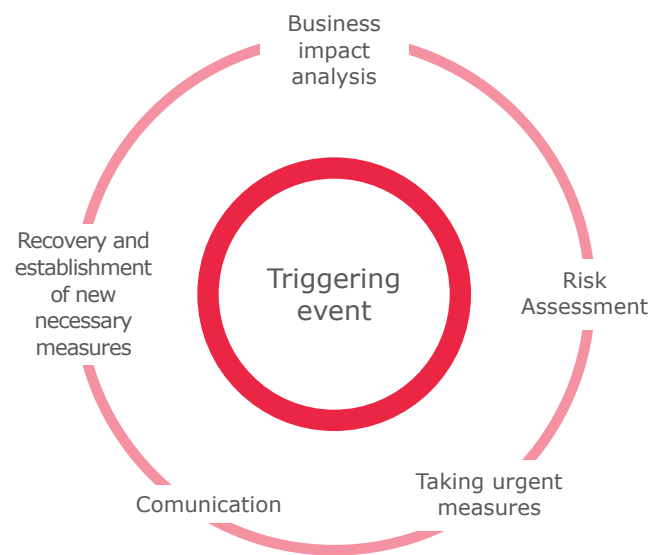
Content

3.1. Analysis in cases of triggering events

Before implementing measures for the continuity of services in the face of any triggering event, an expeditious analysis will be carried out in which:

- a. Critical risks for business continuity or situations that may arise in the event of the triggering event will be identified.
- b. The minimum necessary resources (human, logistical, material, technological and of any other nature) required to maintain and restore services will be determined in the event of a triggering event and its termination.
- c. The type of scenario related to the triggering event will be considered, for example:
 - » Natural disasters
 - » Pandemics
 - » Cyber attacks
 - » Acts of terrorism
 - » Defects or lack of availability of the technological infrastructure (functionality of applications, telecommunications and information processing and other networks)
 - » Acts of sabotage
 - » Unavailability of human, material or technical resources and,
 - » Failures in the services provided by third parties.
- d. The actions to be taken will be determined and priorities will be established in order to solve the situation derived from the triggering event as soon as possible.

The mentioned analysis will correspond to the following scheme:



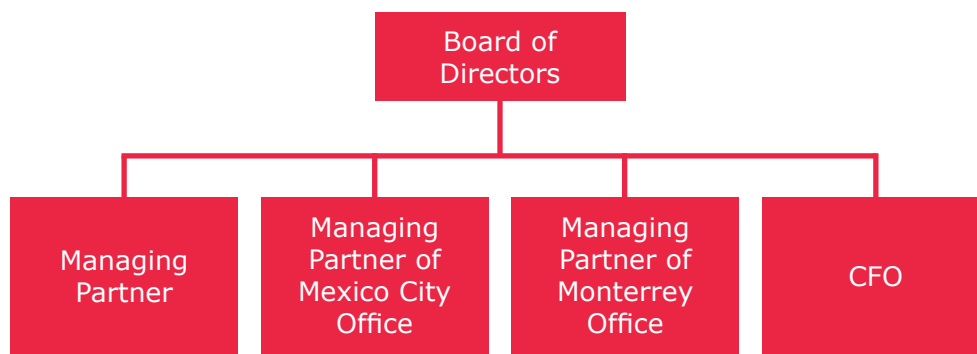
3.2. Existing tools to ensure business continuity

Over time, Sánchez Devanny has equipped itself with tools, both infrastructure and technological as well as human resources, to provide services efficiently, on time and without interruptions in all the fundamental aspects of our operation, as described below:

3.2.1. Corporate structure

The firm has a corporate structure in which powers of attorney and responsibilities have been delegated to different partners, which ensures that there are always people with sufficient legal capacity to assume obligations and commitments on behalf of the firm and thus guarantee business continuity and the uninterrupted exercise of operations.

Likewise, the internal areas of the firm are duly established and the responsibilities of its members are clearly defined, especially the Board of Directors, which is in charge of ensuring the timely taking of any decision that may be related to this policy. The Board of Directors is elected for periods of two years and is made up of three partners and the Director of Administration and Finance:



In relation to the provision of services to our clients, the firm has different practice areas, each one directed by an expert partner in charge of compliance and supervision of such matters, and in turn made up of lawyers of different levels, interns, paralegals and assistants, who as a whole, guarantee the uninterrupted provision of services.



3.2.2. Minimum cash flow guarantee and insurance policies

The Administration and Finance Office contributes to guaranteeing business continuity through the execution of actions and the design of strategies that ensure a previously defined cash flow as necessary for the operation of the firm.

These actions are also aimed at protecting the firm's resources and aimed at the timely fulfillment of our commitments in all aspects of the operation.

Additionally, Sánchez Devanny has business liability insurance that covers events related to its operations, including the provision of services to clients.

3.2.3. Information systems

- » We have an information technologies policy that includes not only the description of the tools that we have, but also a detailed description for handling crisis situations, with the support of specialized providers and with high standards of technical capacity and quality of service (Annex 1).
- » Our computer servers are hosted in a cloud of a specialized provider, which guarantees both the security and backup of the information of the firm and of our clients, as well as uninterrupted availability.
- » At all our offices, the telecommunications systems have independent inputs and outputs that guarantee the continuity of services.
- » Our employees have been equipped with tools such as laptops and cell phones, which allow them to perform their tasks efficiently.
- » We have a virtual private network ("VPN") that allows our employees to carry out their tasks remotely.
- » All our cell phone lines are hosted on a private network and for the exclusive use of Sánchez Devanny.
- » We have the possibility of 4-digit dialing through cell phones, which allows us to communicate through our internal extension numbers.
- » All members of our information technologies team have been and are continuously trained to respond to any situation in a technical and efficient way.
- » We have policies and operating technical manuals for our systems, which allow us to be clear about our corresponding internal processes.
- » We keep the agreements with our suppliers in force and updated and make sure to hire only those who meet the best service and security standards.





3.2.4. Security of our clients' information

In addition to technological tools (computer systems), we have physical files in which we store part of the information of some of our clients. These files are completely protected, since there is a specialized area in Customer and Business Information Control, which controls the file, organization and physical protection of the information, and ensures access to it only by authorized persons.

Likewise, all of our contracts, whether to provide labor or services, contain very robust confidentiality obligations, as well as consequences for eventual violations of these obligations.

Likewise, we have a Code of Ethics and Conduct that establishes the duties of all employees in relation to the protection of information, as well as internal data protection policies in accordance with current laws and under constant review to guarantee their updating.

3.2.5. Human Resources

- » We have an up-to-date record of our employees' data, including contact information in case of emergency.
- » We have internal policies, resources and programs to guarantee the physical and mental wellbeing of our employees.
- » We guarantee full compliance with labor and health and safety regulations at work.
- » We have role descriptions that allow us to continually evaluate the performance of our employees.
- » We efficiently manage the provision of tools and resources necessary for the performance of tasks by our employees.
- » All our employees have signed employment contracts that establish clear obligations not only in relation to their role, but also in relation to compliance with internal regulations that, in turn, are related to ensuring our performance and protection guarantee to our customers and suppliers.





■ Annexes

ANNEX 1: Sánchez Devanny Systems Policy

ANNEX 2: Measures taken to guarantee the health and safety of Sánchez Devanny's employees and visitors at Mexico City, Monterrey and Querétaro headquarters



Contact

Gabriela Cárdenas-Hernández – *Compliance Officer*
gcardenas@sanchezdevanny.com

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