



Professional Practices Policy
Client Protection Policy
Personal Data Protection Policy

Mission

Render integral legal services with the highest professional and ethical standards, aiming to work with the highest efficiency, in the less possible time and with minimum stress for our clients

Vision

Being a law firm leader in the Mexican market and a reference for international law firms

Values

Professionalism

Loyalty

Ethics

Responsibility

Transparency

Honesty

Confidentiality

It's not about how many years of experience you have, it's about the quality of your years of experience

—Jacob Cass.

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Professional Practices Policy

PURPOSE: Partners, associates and law clerks have the obligation of protecting the interests of the client, and of rendering the best possible service thereto, in terms of our mission.

This obligation is not exclusive to the partner, attorney or law clerk, but also of anyone who participates in the works regarding the provision of legal services to the client. Common sense and professional maturity must, at all time, direct the acts and serve as reference of any aspect that could not be contemplated in this document.

All personnel must consult with the partners any doubt or comment it may have regarding any of the firm's activities, and observe the following principles:

1.- Confidentiality

The personnel shall abstain from disclosing confidential information that has been shared by the client, unless it obtains the prior written authorization of the client and it is exclusively used for the provision of the service.

In the daily practice of law not only the work of the attorney is involved, but of all the assistants and administrative personnel. In the ordinary course of such activities there is the need to communicate the confidential information to said individuals, therefore, any person involved, whether assistants or administrative personnel, in the inquiries made to the attorney, are equally bound to keep confidential the information to which it has had access, and not to comment any work being performed for the client with family, friends or third parties.

2.- Conflict of Interests

Each attorney or law clerk has the responsibility of identifying any conflict of interest with the matters in which it is or may be involved, and commence with the responsible partner an analysis and resolution of those conflicts of interest in accordance with the following:

- I. Any client representation must be approved by the responsible partner.
- II. To achieve the maximum efficiency and consistency, the responsible partner must constantly consult and coordinate any aspects regarding a conflict of interest with the other partners and associates.
- III. Any conflict regarding a certain matter shall be referred to and considered by the responsible partner, who shall gather enough information to make an analysis, identifying the conflicts of interest, if any, and making the corresponding decision. If the responsible partner determines there is no conflict, its decision of accepting or rejecting the representation shall be sufficient. If the responsible partner determines the existence of a conflict, the matter shall be analyzed by the Partners' Meeting.
- IV. If an attorney or law clerk involved in a certain matter, considers there is a personal conflict of interest, it shall immediately inform such conflict to the responsible partner and shall immediately abstain from having direct contact with the client and/or matter until a determination is made pursuant to the above paragraph.

3.- Quality

A feature of the quality of the services rendered by Kroy Abogabos S.C. is to place close attention in all details of its activities. Orthographic errors, erroneous quotes, errors in the addressee's information, omission of words or signs and wrong or confusing drafting, among others, reflect deficiencies in the quality of the activities entrusted to the attorney, to the law clerk or to the administrative personnel thus affecting the firm in general.

Negligence reflected by actions such as the above is not allowed, and lack of honesty towards the firm, the client and/or its members is in no way tolerated.

It is necessary to review any document that is sent to a client to avoid any mistakes of any nature. This responsibility lies in all those involved in the drafting, preparation, review and final authorization of the document.

Any final document that is sent to a client must have been carefully reviewed, thus avoiding any errors therein that may affect the quality of the opinions and other documentation prepared.

4.- Timing

The requests and the needs of our clients often require answers and solutions within a short timeframe, and may even be subject to mandatory deadlines that must inevitably be observed and met, therefore, the nature itself of our practice requires both lawyers and law clerks to be always willing to perform their activities within the necessary timeframes, with the purpose of responsibly complying with the obligations and commitments undertaken before the client.

The client expects quality in the services of the attorneys, law clerks and of the personnel involved in the rendering of the services, and also expects the timely performance of the accepted commitments and of the given word.

The need to complete the entrusted activities within a certain timeframe in no way justifies sacrificing quality, completeness, clarity and precision of the task at hand.

5. Responsibilities

Clients choose the firm based on the group of talents of specialized lawyers, therefore, only partners and associate attorneys may render opinions and adopt the final responsibility for any type of work performed by the firm. Law clerks and administrative personnel complement the important function of the attorneys with their support, so that they may respond to the requested inquiries. Therefore, only the responsible partners or the associate attorneys appointed by the responsible partner, are authorized to respond directly to inquiries of clients regarding legal consultations.

6. Client Relationships

The relationship kept by attorneys and law clerks with clients shall be supervised by the responsible partner, taking into account the service entrusted by the client. Nevertheless, all personnel of Kroy Abogados S.C. must act at all times with the highest level of professionalism and respect.



Client Protection Policy

PURPOSE: Establish fair practices for our client relationships based on the Political Constitution of the United Mexican States, Standard ISO 26000 of Corporate Responsibility, Principle One of the World Pact of the United Nations Organization, Universal Declaration of Human Rights, American Convention on Human Rights, Federal Consumer Protection Law (*Ley Federal de Protección al Consumidor*), United Nations' Consumer Protection Guidelines, Personal Data Protection Law (*Ley de Protección de Datos Personales en Posesión de Particulares - LFPDPPP*) and its guidelines, International Standards of the United Nations, the European Parliament and the European Board on Personal Data Protection.

- 1.- Provide our clients with access to adequate, truthful and pertinent information that allows them to have sufficient elements according to their needs, to engage the legal services of our firm.
- 2.- Kroy Abogados S.C., prevents the use of practices that damage the financial interests of our clients, guaranteeing that our services comply with the applicable Mexican and international laws and regulations in force.
- 3.- Kroy Abogados S.C. directs its efforts towards a sustainable service, taking into account at all times the satisfaction of the basic needs of all members of society, the reduction of inequality and the eradication of all types of discrimination.

4.- Respect of data privacy:

4.1. The processing of client data shall be used for the following purposes:

- 4.1.1. For contact purposes by virtue of the rendering of the engaged services.
- 4.1.2. Being informed and invited, if the case may be, to participate in different training courses or events organized by the firm.
- 4.1.3. Performing quality assessments of the services we offer.

4.2. If the registration of such information is required, the one responsible for the registration shall also be responsible for the information contained therein.

4.3. Responsible partners must verify from time to time the use and processing of the information.

4.4. Contracts and agreements executed with our clients shall clearly specify the protection of personal data, based on our privacy notice.

4.5. Sensible personal data that must be obtained for the rendering of professional services must be handled with responsibility.

5.- Rights of the client:

5.1. Right to choose the legal services based on a fair and loyal competition with our competitors.

5.2. Right to be heard and to share its needs, expectations, as well as its nonconformities.

5.3. Right to receive professional services of excellence.

5.4. Right to terminate in advance the provision of professional services pursuant to the contract or agreement executed between the parties.



6.- Communication with clients. The responsible partners or associate attorneys who intervene in the provision of services, shall:

- 6.1. Keep our clients informed of the status of their matters.
- 6.2. Respond to all concerns submitted by our clients, regarding their matter.
- 6.3. Fully disclose prices, taxes, total expenses, terms and conditions of the contracted services.
- 6.4. Provide a solution to the differences or disagreements of our clients with regards to the provision of our services.

7.- Quality:

- 7.1. All personnel of Kroy Abogados S.C. must render their services and perform their duties with the highest quality, based on the clients' requirements.
- 7.2. Kroy Abogados S.C., has a Quality Management System; implemented into the Client Attention procedure to strengthen its competitive advantages and to be able to render a service of excellence.



Personal Data Protection Policy

PURPOSE: Based on the provisions in the Federal Data Protection Law in force, Kroy Abogados S.C. agrees to comply with all applicable safety measures, from the collection of the information until its disposal. To such end, Kroy Abogados S.C. uses safety mechanisms and standards that guarantee the confidentiality of the information of our clients.

1. Establishing a contact implies that all personal information supplied by the clients to Kroy Abogados S.C. may be filed, stored, processed and used for internal and quality purposes as means of contact for the different purposes set forth below:
2. The scope of this Personal Data Protection Policy applies to the information of clients and users who establish communication with Kroy Abogados S.C. and to the use of such information, whether verbal, electronical and/or in writing.
3. Processing of our clients' data shall be used for the following purposes:
 - Being contacted in connection with the provision of the contracted services.
 - Being informed and invited, if the case may be, to participate in the different training courses or events organized by the firm.
 - Performing quality assessments on the services we offer, if the client accepts.

4. If a register of the information of the clients exists, the person responsible for the register is equally responsible for the information therein contained and shall treat it as **CONFIDENTIAL**, so that it will not share it with third parties at any time, unless if ordered by any authority prior knowledge of and/or authorization from the responsible partner.
5. Responsible partners must verify from time to time the use and processing of the information of the clients.
6. The contracts and agreements executed with our clients shall clearly specify the protection of personal data.

7. Application for a job offer

When applying for a job in Kroy Abogados S.C., the request shall be directly submitted to the company and it shall be treated as confidential information.

8. Data Quality

All information is relevant, and it is therefore possible that after a certain time, any member of Kroy Abogados S.C. may make phone calls to verify and/or update data, the foregoing, in order to have effective and quality communication with our users and clients regarding the processing of the information.

9. Insofar as Kroy Abogados S.C. is governed by a Quality Management System, data has first and foremost an informational nature, in order to provide evidence of the activities or processes performed, therefore, the time of its safeguard shall be in accordance with its use.





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