

Guidelines for identifying and responding to potential conflicts of interest

This document is designed to ensure that the use of resources and decision-making always seeks institutional benefit and development above personal benefits. In other words, that all our actions and decisions made in our roles as members of the board, executives, faculty, medical staff, collaborators, or suppliers of Tecnológico de Monterrey, TecSalud, and Tecmilenio are aligned with our values and Code of Ethics, and in particular with the fifth guideline, which states:

"We avoid all types of conflicts of interest, and should any arise, we keep the corresponding authorities informed".

A conflict of interest (COI) is any situation in which financial, business, personal, or family interests may unduly influence the objectivity and impartiality of an employee's or faculty's decision-making, affecting or favoring certain individuals to the detriment of the benefits or interests of the Institution.

In the professional sphere and in the performance of our duties, it is natural to encounter situations involving conflicts of interest, arising from our personal, family, or business relationships.


The existence of a conflict of interest does not necessarily imply a violation of our Code of Ethics. However, when they occur, they must be identified, declared, and properly managed.

For this reason, it is important that, as members of our institutions, we are aware of situations that may represent a conflict of interest and have a clear understanding of what this definition entails.

In case you detect or have doubts about being in a potential conflict of interest, remember that you must declare it through the email: conflictosdeinteres@servicios.tec.mx

Below are some recommendations you should keep in mind to avoid behaviors that may give rise to a conflict of interest:

1. Remember that disclosing a potential conflict of interest helps us manage it appropriately. Therefore, you must do so through the course *"my Commitment to integrity"*, or at any time during the year by emailing conflictosdeinteres@servicios.tec.mx

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2. Board members, faculty members, doctors, and employees of Tecnológico de Monterrey must avoid situations that lead or seem to lead to conflicts of interest, where personal and Institutional interests are in conflict, so we do not accept or offer gifts in money, in-kind, services, benefits, or hospitalities for family, or affinity, or for third parties who have professional relationships, or for partners or societies with whom the employee or the people aforementioned take part, and which could compromise the objectivity in current and future negotiations and administrative or academic decision-making.
 3. Regarding family members working in the Institution, it is possible as long as:
 - a. They meet the requirements to occupy the position
 - b. They are not direct subordinates
 - c. They, preferably, do not work in the same department.
 - d. In case there is indirect subordination, neither one can interfere or participate in the decisions that affect the other in the Institution.
 4. When the decision of a teacher or employee on behalf of Tecnológico de Monterrey, TecSalud and Tecmilenio leads to a possible conflict of interest, before making the decision, a consult must be sent to the following e-mail: conflictosdeinteres@servicios.tec.mx
 5. In processes related to acquisitions or commercial relationships, board members and immediate family, as well as organizations of their ownership, can participate without preference over other value partners in competitive processes.
 6. No member of the Tecnológico de Monterrey, TecSalud or Tecmilenio community must participate, authorize, or induce corruption practices, either directly or through third parties. The federal anti-corruption law must be applied as our own.
 7. No member of the Tecnológico de Monterrey, TecSalud or Tecmilenio community must make decisions regarding operations with business deals, where he/she or his/her family or by affinity, have personal interests.
 8. A board member, faculty member, doctor, or employee cannot provide services to other people or institutions to obtain personal benefit using Institutional material resources, tools, employees, information, or personal data as of their position, nor industrial or intellectual property.
 9. Accepting legitimate promotional articles, or hospitality, is not a conflict of interest, when their value does not exceed \$500 pesos (MXN), thanking and stating that it was not necessary.



Handling of exceptions

In line with our Empowerment with responsibility culture, you as a leader, are entitled to make the best decisions, always in favor of the Institution. Any situation not covered in this document must be documented as an exception, requesting authorization from the Institutional Integrity area of the Vice Presidency of Integrity and Compliance.

We are here for you!

If you need advice or support with this guide, contact Institutional Integrity at the email conflictosdeinteres@servicios.tec.mx, and they will gladly help you out.

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Institutional Integrity – Ahiram Barbosa