

*[Translation for informational purposes only]*

**Becle S. A. B. de C. V.**

Report on the Financial Statements and  
Report on the Review of the Financial Position of the Taxpayer  
December 31, 2023



## **Independent Auditor's Report**

To the Board of Directors and Shareholders of Becele, S. A. B. de C. V.  
To the Ministry of Finance and Public Credit  
To the Tax Administration Service (SAT)  
To the General Administration of Large Taxpayers.

### **Opinion**

We have audited the financial statements of Becele, S. A. B. de C. V. (the Company) including the statement of financial position as of December 31, 2023, and the statements of income, of changes in the stockholders' equity and of cash flows, for the year ended as of such date, as well as the summary of the significant accounting policies, other explanatory information and the exhibits of information exclusively required by SAT in Exhibit 16 of the Tax Miscellaneous Resolution for 2024 (RMF), included in the Tax Report Presentation System 2023 (SIPRED).

In my opinion, the attached financial statements and the complementary exhibits exclusively submitted to comply with the tax obligations of Becele, S. A. B. de C. V. as of December 31, 2023, have been prepared, in all material aspects, according to Articles 32-A of the Federal Tax Code (CFF), 58, Fractions I, IV and V, of the Regulations of the CFF (RCFF), Rules 2.10.6., 2.10.14., 2.10.15. of the RMF, and with the integration instructions and characteristics and guide forms to submit the report of financial statements for the tax purposes included in Exhibit 16 of RMF.

### **Basis to support the Opinion**

I have performed my audit according to the International Audit Standards (IAS). My responsibility according to such standards are described below in Section "Auditor's Responsibility in connection with the Audit of Financial Statements" of this report. I am independent member from the Company according to the provisions of the Code of Professional Ethics of the Instituto Mexicano de Contadores Públicos, A. C., fraction II of Article 52 of CFF, and Article 60 of RCFF, and I have complied with the other ethical responsibilities according to such legal and regulatory requirements. I think that the evidence of the audit I have obtained provides an appropriate basis to support my opinion.

### **Emphasis paragraph – Basis to submit the financial statements**

The Note 2 to the financial statements describes that such financial statements have been prepared to be used by the SAT and, therefore, they have been submitted and classified according to the forms and the instructions designed by the SAT for such purposes and they



may be not useful for other purposes. My opinion has not been modified in connection with such matter.

### **Other matters**

Becele, S. A. B. de C. V. has prepared other financial statements as of December 31, 2023, according to the International Financial Reporting Standards on which an opinion has been issued on a separate basis as of April 29, 2024, according to the ISA without exceptions.

### **Responsibilities of the Administration and officers in charge of the governance of the Company in connection with the financial statements**

The Company's Administration is responsible for preparing the financial statements and the complementary exhibits according to Articles 32-A of the CFF, 58, Fractions I, IV and V of RCFF, Rules 2.10.6., 2.10.14. of RMF, the integration instructions and characteristics and the guide forms to submit the report of financial statements for the tax purposes included in Exhibit 16 of RMF, and the internal control considered necessary to allow the preparation of these financial statements free from material mistakes, whether by fraud or error.

By preparing these financial statements, the Administration is responsible for assessing the capacity of the Company to continue as a going concern, disclosing, if applicable, the matters related to the going concern and using the accounting basis of the going concern, except if the Administration has the intent to liquidate the Company or cease operations or if there are no other more real alternatives to do so.

Officers in charge of the governance of the Company are responsible for supervising the financial reporting process of the Company.

### **Auditor's responsibility in connection with the audit of the financial statements**

My object is to obtain the reasonable assurance that the financial statements, as a whole, are free from material mistakes, whether by fraud or error, and to issue an audit report including my opinion. Reasonable assurance is a high level safety, but it does not guarantee that the audit performed according to the International Audit Standards are free from material mistakes, if any. The mistakes may be due to fraud or error and they are considered material if, individually or jointly, they may be reasonably prevented to have influence on the economic decisions adopted by the users based on the financial statements.

During my audit according to the IAS, I applied my professional opinion and I maintain a sceptic professional attitude. In addition:



- I identified and assessed the material error risks in the financial statements due to fraud or error, I designed and applied audit procedures to be liable to such risk and obtained enough and appropriate evidence of audit to support my opinion. The risk of not detecting a material mistake due to a fraud is higher than other, such as an unintentional error, as the fraud may imply collusion, falsification, forgery, deliberated omissions, deceitful intentional statements or elusion of internal controls.
- I obtained an understanding of the relevant internal control for the audit in order to design the audit procedures to be appropriate with respect to the circumstances and not in order to express an opinion on the effectiveness of the Company's internal control.
- I assessed if the applied accounting policies are appropriate and the reasonability of the accounting estimates and the related disclosures submitted by the Management.
- I assessed if it is appropriate that the Management uses the accounting basis of a going concern to prepare the financial statements and if based on the audit evidence obtained there is the material doubt based on the facts and conditions that may generate significant doubts on the capacity of the Company to continue as a going concern. If I determine that there is a material doubt, I should inform it in my audit report on the information disclosed in the financial statements or if such disclosures are inappropriate, I should state a changed opinion. My conclusions are based on the audit evidence obtained as of the date of my audit report. However, future facts and conditions may be a cause for the Company to cease and stop being considered a going concern.
- I jointly assessed the structure and contents of the financial statements, including the disclosed information, the summary of significant accounting policies, other explanatory information and the information exhibits required by the SAT in Exhibit 16 of RMF.

I informed the officers in charge of the governance of the Company, among other matters, the scope and the time to perform the audit and the significant findings of the audit, as well as any significant deficiency of the internal control identified during my audit.

(Signed)

L.C.P.C. José Luis Guzman Ortiz  
Entry No. 16322 in  
General Administration of  
Large Taxpayers

Mexico City, May 10, 2024



**Report on other legal and regulatory requirements**  
**Report on the review of the taxpayer's financial position**

To the Board of Directors and Shareholders of Becele, S. A. B. de C. V.  
To the Ministry of Finance and Public Credit  
To the Tax Administration Service (SAT)  
To the General Administration of Large Taxpayers.

1. I issue this report in connection with the audit I performed under the International Audit Standards of the financial statements prepared by the Management of BECLE, S. A. B. de C. V., according to Articles 32-A of the Federal Tax Code (CFF), 58, Fractions I, IV and V, of the Regulations of CFF (RCFF), Rules 2.10.6., 2.10.14., 2.10.15. of the Tax Miscellaneous Resolution for 2024 (RMF) and with the integration instructions and characteristics and the guide forms to submit the report of financial statements for the tax purposes included in Exhibit 16 of RMF. An audit conducted in accordance with ISA provides a reasonable level of assurance; however, it does not provide assurance that an audit will detect a possible omission, error or conduct that could constitute the commission of a tax offense because it is not designed to do so.

As a consequence of this audit, I issued a report dated May 10, 2024, without exceptions.

2. Exclusively for the provisions mentioned in this Section 2, I state under oath that based on Articles 52, Fraction III, of CFF, 57 and 58, Fraction III, of RCFF, and Rule 2.10.15. of RMF, that as part of my audit described in Section 1 above, I reviewed the information and additional documentation prepared and under the Company's responsibility, according to Articles 32-A of CFF, 58, Fractions I, IV and V, of RCFF, Rules 2.10.6, 2.10.7., 2.10.14. of RMF and the guide forms and the integration and the integration instructions and characteristics to submit the report of financial statements for the tax purposes included in Exhibit 16 of RMF, submitted in the 2023 Tax Report Submittal System (SIPRED) by internet to the SAT. I have audited this information and documentation with selective tests, using the audit procedures and scope that I considered appropriate in such circumstances based on my professional judgment. I consider that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion., according to the ISAs, on the financial statements taken as a whole. Such information is included for exclusive use and analysis by the General Administration of Large Taxpayers'. Based on my audit, I state the following:
  - i. Within the selective tests performed in compliance with the IAS, I reviewed the financial position of the taxpayer referred to in Article 58, Fraction V, of RCFF, for the period of the reported financial statements and within the scope of my selective tests, I reviewed that the goods and services acquired or disposed or granted in use or enjoyment to the Company were effectively received, provided or rendered, respectively. According to Fraction II of Rule



2.10.15 of RMF, the procedures I applied failed to include the examination with respect to the compliance with the provisions in customs and foreign trade matters regulations.

In my workpapers there is evidence of the audit procedures applied to the items selected by sampling supporting the findings.

- ii. I verified, based on selective tests and ISAs, the calculation and payment of federal taxes incurred in the year, included in connection with the taxes by the taxpayer as direct subject or as withholder. The Company will be audited for purposes of the Mexican Social Security Institute (IMSS) and INFONAVIT, for the year ended December 31, 2023, by another Registered Public Accountant and the respective work is currently being performed. The scope of such report may differ from this one, and if differences are found, they will be corrected; likewise, any difference applicable to the contributions corresponding to INFONAVIT and SAR must be paid.
- iii. I reviewed, based on selective evidence and the ISAs, that the taxpayer has the right to the credit balances requested in the refunds (or) applied in compensations that were carried out during the year subject to my audit and that the amounts pending to be returned or refund to the Company by the tax authority derive from said balance.
- iv. I reviewed with respect to the nature and method of application, if applicable, in previous years, the concepts and amounts corresponding to the year ended December 31, 2023, showed in the following exhibits:
  - Conciliation between the accounting and tax income for the Income Tax purposes, and
  - Conciliation among the income reported according to the statement of comprehensive income, accruable for the income tax purposes and the total sum of acts or activities for the value-added tax purposes (VAT).
- v. During the year I did not notice that the taxpayer submitted complementary returns amending the previous years. Likewise, I reviewed the complementary returns of which I was aware submitted by the taxpayer for the tax differences of the fiscal year, verifying that they were presented in accordance with the tax laws.
- vi. I reviewed, based on its nature and application mechanism used in previous fiscal years, the determination of the Employees' Statutory Profit Sharing (ESPS) corresponding to the year ended December 31, 2023; likewise, I reviewed the payment of the ESPS by selective tests.



- vii. I reviewed, by selective tests, the balances of the accounts corresponding to the year ending on December 31, 2023, which are indicated in the exhibits related to the comparative analysis of the expenses subaccounts, the comparative analysis of subaccounts of the comprehensive financing income, reconciling, where appropriate: a) the differences with basic financial statements, derived from classifications for presentation, and b) the determination of deductible and non-deductible amounts for income tax purposes.
- viii. I did not notice that the Company had resolutions by the tax or jurisdictional authorities (the Federal Administrative Justice Court (formerly, the Federal Tax and Administrative Justice Court) or the Supreme Court of Justice of Mexico, the District and Collegiate Circuit Courts) or that it received tax incentives, exemptions, subsidies and tax credits, during the year ended as of December 31, 2023.
- ix. During the year based on my audit tests, I did not observe that the Company was jointly responsible as withholder in the sale of shares made by residents abroad.
- x. I reviewed the exchange gains and losses accrued from foreign currency fluctuations during the year. Said review was carried out on a selective basis through substantive tests of detail due to exchange fluctuations and substantive analyses.
- xi. The balances of the Company with its main related parties, as of December 31, 2023, are disclosed in Note 8 to the financial statements, included in the Exhibit "Notes to the Financial Statements" of SIPRED. The operations with related parties made during the year are disclosed in exhibit 16 "Operations with Related Parties" of SIPRED.

Within the scope of my selective tests, I reviewed the compliance with the obligations related to operations with related parties according to the following provisions: Articles 11, 27, Fraction XIII, 28, Fractions XVII, paragraph fourth, paragraph b), XVIII, XXVII, XXIX, 76, Fractions IX, X and XII, of the Income Tax Law.

- xii. During the year ended as of December 31, 2023, in the General Data Exhibit of SIPRED, the Company incorporated the information related to the application of some different criteria than those known by the tax authority under Article 33, Fraction I, paragraph h), of CFF, in force as of December 31, 2023. The taxpayer stated in such exhibit that during the year ended as of December 31, 2023, such criteria were not applied.



- xiii. Within the scope of my selective tests, I reviewed the information that the taxpayer stated in the returns submitted in compliance with its obligations to the following tax provisions without any omission:
- a. Article 76, Fraction VI, of LISR "Information on foreign residents" (Exhibit 4 of DIM).

The Company does not submit the following informative returns, as during this year, it did not perform operations, therefore, such information should not be submitted:

- a. Article 76, Fraction XIII, of LISR "Return of operations made through trusts (Exhibit 10 of DIM).
- b. Article 178 of LISR, official form 63 "Informative return of preferential tax systems".
- c. Article Nine of Transitory Provisions of LISR for 2014, Fraction X, "Information of payments and withholdings of income tax, VAT and IEPS" (Exhibit 2 of DIM), and "Report of residents abroad (Exhibit 4 of DIM)", this with respect to withholding to residents abroad. Article 76, Fraction III, of LISR, and 32, Fraction V, of the VAT Law, "Information of withholdings to residents abroad stated in CFDI".

It is important to note that a public accountant does not have the professional training, nor the legal powers, to determine and/or legally qualify which conduct could constitute the commission of a tax crime, which is why it will be up to the competent authorities in any case to legally determine the existence or not of the alleged conduct that could constitute a tax crime.

#### ***Other matters***

3. My answers to the questions of the interrogatories of tax diagnosis and transfer prices matters, part of the information included in SIPRED, are based on the result of my audit to the basic financial statements taken as a whole of the Company as of December 31, 2023, and for the year ended as of such date, which was prepared according to IAS; consequently, the answers stating the compliance with the tax provisions by the taxpayer are supported with: a) the result of the audit I performed according to IAS, or b) the fact that during the audit that I performed according to the IAS, I reviewed it and it did not notice any noncompliance by the taxpayer with the tax obligations.

Some answers to the questions of the tax diagnosis questionnaire and the transfer price questionnaire were left in blank, as: 1) they do not apply to the Company, 2) there is no potential answer, or 3) the information was not reviewed, as it is not part of my review, which is not a noncompliance with the tax provisions.



Tax diagnosis exhibit (Review by the Public Accountant)

01260005000000

Exhibit of the Transfer Price Questionnaire (Review by the Public Accountant):

01270006000000, 01270045000000, 01270052000000, 01270054000000,  
01270058000000, 01270059000000.

4. In connection with the answers of the Company on tax diagnosis interrogatories of the taxpayer and with respect to the transfer prices questionnaire included in Exhibits "General Data" and "Taxpayer Information on Operations with Related Parties", respectively, that are part of the information included in SIPRED, I have analyzed and reviewed that such answers are consistent with the result of my audit that I performed according to IAS.

Therefore, the answers stating the compliance with the tax provisions by the taxpayer are supported on the fact that during the audit I performed I reviewed it and I did not notice any noncompliance with the tax obligations referred to in such interrogatories.

Likewise, some questions require information that is not part of the basic financial statements, as such answers were provided by the Company and are not part of my audit.

**Non-material breaches identified and/or without effect on federal taxes and contributions**

5. As of December 31, 2023, no differences were identified that should be disclosed in the column "Nonmaterial differences not investigated by the audit" of the Exhibit "List of Contributions by Taxpayer as Direct Subject or as Withholder".

(Signed)

L.C.C. José Luis Guzmán Ortiz

Entry Number 16322

In the General Administration of Federal Tax Audit

Mexico City, May 10, 2024