



ANTI-CORRUPTION POLICY

OBJECTIVE:

In GRUPO JCV HOLDINGS, we carry out commercial practices based on compliance with the laws; We are also committed to carrying out our activities with adherence to values such as legality, integrity, loyalty, respect, honesty, honesty and responsibility.

Likewise, we have the commitment that any activity we carry out has a support based on the values that characterize us; thus condemning corruption, bribery, fraud or any other illegal act that may arise, derived from the provision of our services.

The particular objective of this Policy is to establish guidelines and obligations to prevent and combat any type of act of corruption.

DEFINITIONS:

Acts of corruption¹: Based on the Inter-American Convention against Corruption:

- a) The solicitation or acceptance, directly or indirectly, by a public official or a person exercising public functions, of any object of monetary value or other benefits such as gifts, favours, promises or advantages for himself or for another person or entity in exchange for the performance or omission of any act in the exercise of his public functions;
- b) The offering or giving, directly or indirectly, to a public official or a person exercising public functions, of any object of monetary value or other benefits such as gifts, favours, promises or advantages for that public official or for another person or entity in exchange for the performance or omission of any act in the exercise of his or her public functions;
- c) The performance by a public official or a person exercising public functions of any act or omission in the exercise of his functions, with the aim of illicitly obtaining benefits for himself or for a third party;
- d) The fraudulent use or concealment of assets derived from any of the acts referred to in this article; and
- e) Participation as author, co-author, instigator, accomplice, accessory or in any other way in the commission, attempted commission, association or conspiracy for the commission of any of the acts referred to in this article.

Collaborator: Any employee of GRUPO JCV HOLDINGS.

Conflict of Interest: When directly or indirectly the personal interests of the Collaborators or their Relatives influence in a real, potential or apparent way in the decision making of operations or negotiations

Corruption: It is an act by which a person is driven to act differently from the normative standards of the system to favor particular interests in exchange for a reward.

¹ Inter-American Convention against Corruption



Public Official: Is a servant of the State, appointed by provision of the Law, by popular election or by appointment of competent authority, to occupy higher grades of the organic structure and to assume functions of representativeness, initiative, decision and command.

Gratuity: Also called a "gift," includes any payment made in cash, in kind, or by discount, such as Bribery to obtain an Undue Advantage.

Bribery: It is offering, promising or giving away, as well as demanding or accepting, any Undue Advantage or gain, whether directly or indirectly, to obtain, retain or carry on a business for a particular company or secure any other Undue Advantage to achieve it.

COMMITMENT

- 1.-** Comply with international laws and conventions on combating corruption.
- 2.-** Comply with all financial reporting standards applicable to GRUPO JCV HOLDINGS, since the falsification of our books and accounting records is strictly prohibited and constitutes a crime.
- 3.-** Reject and refrain from offering, any type of bribe or gift, to any authority or person with whom you have a commercial dealing.
- 4.-** The obtaining of authorizations, permits, licenses or any procedure required for the provision of services, will be processed directly by the Collaborators or through Managers authorized by GRUPO JCV HOLDINGS, obliging us that the procedures will be carried out in a lawful, ethical manner and in accordance with the regulations that regulate it.
- 5.-** Zero tolerance against acts of corruption, committing ourselves to communicate and report, if necessary, to the corresponding authorities those cases in which an employee or third party incurs in an act of corruption.
- 6.-** To enter into contracts in which we establish anti-corruption clauses to prohibit acts of corruption and illegal practices, as well as to demand compliance with all laws applicable to our clients.