

## **POLICY FOR REPORTING ILLEGAL ACTS AND PREVENTING RETALIATION.**

### **OBJECT:**

Establish policy to prevent and protect against retaliation and establish a framework and procedure to protect individuals who are part of the organization against retaliation.

### **DEFINITIONS:**

Prohibited practices: refers to corrupt, fraudulent, collusive, coercive, obstructive and immoral practices.

Retaliation: Any direct or indirect harmful action recommended, threatened, or taken because an individual reported wrongdoing in good faith or cooperated with an authorized fact-finding activity.

Denunciation: is the act by which a person informs another person and / or the authority about the possible commission of facts that may be contrary to the law.

### **POLICIES:**

1.- All the personnel of GRUPO JCV HOLDINGS, have the right and duty to report any suspicion of irregularity.

People who report such cases will be protected from retaliation.

2.- Any employee of GRUPO JCV HOLDINGS may inform the Human Resources department, the General Management, the General Management, or any authority that the employee considers competent regarding the existence of any conduct that is contrary to the law, to the values as a company or any act that violates their human dignity.

3.- Such acts may be formally denounced by means of a simple writing, in which they narrate in detail, the conducts that in their opinion could be a prohibited practice; Or, they may be reported directly to the authorities, if the collaborator considers it so.

4.- All complaints received will be admitted for processing and the possible existence of prohibited or illegal practices will be evaluated.

5.- If the existence of a prohibited or illegal practice is considered, an internal investigation will be initiated in order to obtain as much information as possible and combat the situation; so that, if necessary, the competent authorities are heard.



6.- From the moment the complaint is received, any type of reprisals will be watched over and prohibited.

7.- Retaliation committed by staff members constitutes misconduct that will lead to disciplinary measures, dismissal and even giving them a view to the competent authorities depending on the type of retaliation.