

TRANSPARENCY LINE POLICY



GRUPO ARGOS

Investments that transform

1. OVERVIEW

Based on the commitment of Grupo Argos to integrity and transparency, the company has implemented a Transparency Line, which is a toll-free and confidential channel through which all employees, clients and the public in general can report any incorrect acts or any non-compliance with the Code of Conduct.

2. OBJECTIVE

The main objective of this policy is to regulate the operation of the Transparency Line of Grupo Argos and to provide all Employees, Managers, Shareholders, Related Third Parties and the public in general the conditions they require to submit anonymous reports on acts or events that represent or appear to represent irregular, fraudulent or illegal conducts.

3. POLICY

All Employees, Managers, Shareholders, Directors and Related Third Parties have the obligation of reporting any Incorrect Acts¹ they become aware of, in order to contribute to the transparency of the company and to prevent the violation of applicable internal and external rules. With the objective of fulfilling the above, Grupo Argos:

1. Has established a Transparency Line that can be accessed by telephone² or by email³.
2. Has delegated the operation of the Transparency Line to an independent third party, which is under the obligation of maintaining strict confidentiality over the identity of the reporting person, if he/she requests it.
3. Has a Corporate Conduct Officer who is responsible for carrying confidential records on the reports, complaints and inquiries that are submitted and for forwarding them to the Investigation Officers for appropriate processing.
4. Has Investigation Officers in charge of investigating the complaints or reports forwarded to them by the Corporate Conduct Officer and for taking appropriate measures according to the general parameters established by the Corporate Conduct Committee.
5. Does not take reprisals in the case of reports submitted in good faith, and will protect those who have submitted reports, even if they prove to be mistaken.
6. Has implemented a detailed procedure on the operation of the Transparency Line.

4. SCOPE

This policy applies to all Employees, Managers, Directors and Related Third Parties of Grupo Empresarial Argos.

5. KEY STAKEHOLDERS

The following are the persons who are directly involved and through whom the activities required to full the policy should be implemented:

¹ Including incorrect acts related to Fraud, Bribery, Corruption, Asset Laundering and Financing of Terrorism.

² Telephone line 01-8000-126-166, available Monday through Saturday from 6:00 a.m. to 10:00 p.m.

³ E-mail grupoargos@lineatransparencia.com, available 24 hours a day, 7 days a week.

Transparency Line:

01-8000-126-166

grupoargos@lineatransparencia.com

- Compliance Director
- Compliance Officer
- Vice-Presidents
- President
- Internal Auditing
- Conduct, Finance and Risk Committee
- Board of Directors

6. CONTROL AND APPROVAL RESPONSIBILITIES

This policy may be updated upon recommendation of the Audit, Finance and Risk Committee and must be approved by the Board of Directors.

The Audit, Finance and Risk Committee, with support of the Conduct Committee, shall review this policy and propose any changes it deems appropriate.

Given that this policy has special impact on third parties and shareholders, once it is approved by the Board of Directors it shall be published on the website. Any changes made shall be published with the same level of exposure.

6.1. VERSION AND UPDATES:

No.	Chapter	Date	Description of Version / Changes
V001	All	July 28, 2015	

6.2. REVIEW AND APPROVAL:

Approval	Approval Date
Audit, Finance and Risk Committee – Minute No. 45	July 28, 2015
Board of Directors – Minute No. 2645	July 28, 2015

Transparency Line:

01-8000-126-166

grupoargos@lineatransparencia.com