



Anti-Corruption Policy
Rev March 2020



Goal

To reiterate the commitment of AMV Global Group and subsidiaries (AMVGG) to strict compliance with the rules for the prevention and fight against corruption (Glossary 1), developing the principles set out in the Code of Ethical Conduct, and extending compliance not only to all employees of companies in which AMV Global Group exercises direct or indirect control of management but also to our business partners (glossary 2).

Commitments

AMVGG rejects all forms of corruption by applying zero-tolerance criteria with respect to any breach of this policy.

To prevent corruption, AMVGG will carry out all its activities in accordance with the legislation in force in all areas of action and in all the countries in which it operates, in accordance with its spirit and purpose, and undertakes to:

- Not to influence the will or objectivity of persons outside the Group to obtain any benefit or advantage using unethical practices and/or contrary to applicable law.
- Not to give, promise or offer, directly or indirectly, any goods of value (glossary 3) to any natural or legal person, to obtain undue advantages for the Company.
- Not to finance or show support, or support of any other kind, directly or indirectly to any political party, its representatives or candidates.
- Not to solicit or improperly receive, directly or indirectly, commissions, payments or benefits from third parties on the occasion of, or caused by, the investment, closing, financing or expense carried out by the Group.
- Pay special attention to those cases in which there are indications of lack of integrity of the persons or entities with whom business is carried out, to ensure that AMVGG establishes and maintains commercial relationships only with qualified and reputable persons and entities.
- To accurately and adequately reflect all the actions, operations and transactions of AMVGG in the books and records.
- To promote internal training in the prevention and fight against corruption.

If employees have any knowledge, doubts or suspicions regarding any form of corruption, they must immediately report it to a Hierarchical Superior, to Legal Counsel or to a Member of the Board of Directors of AMVGG. Both employees of AMVGG and any third party may also



transmit their doubts or concerns through the AMVGG Compliance and Ethics Channels (glossary 4).

AMVGG will not tolerate any retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this policy.

Employees who violate these provisions will be subject to the corresponding disciplinary measures, including the termination of the contract, as well as other possible legal actions and/or sanctions. Likewise, AMVGG reserves the right to adopt the measures it deems appropriate against business partners who fail to comply with it.

AMVGG considers compliance with this policy to be the responsibility of all of its employees.

This policy was approved by the AMVGG Board of Directors on March 5, 2020.



Glossary

1 Corruption: offering, promising, granting, receiving, soliciting, or accepting an unjustified benefit, for oneself or for a third party, to unduly favor another in the acquisition or sale of goods, in the contracting of services, or in commercial relations.

2 Business partners: partners, contractors, suppliers, agents, distributors, non-operated joint-ventures and other collaborating companies.

3 Asset of value: cash or cash equivalent, gifts, loans, gratuities, advantages or benefits of any kind.

4 The Compliance and Ethics Channels allow you to make inquiries and report possible breaches of the Code of Conduct and Ethics confidentially and without fear of retaliation. It is available 24 hours a day, 7 days a week, by phone +58-412-7713649 and/or through amvglobal.operations@gmail.com mail