



Construcciones El Condor S.A.'s Board of Directors, at its regular session 272 of December 19, 2016, and modified at its regular session 287 of October 31, 2017, exercising its legal and statutory powers, approves the following policy:

### **Construcciones El Condor S.A. Ethics Hotline Policy**

By adopting this policy, in accordance with the best corporate governance practices, and the commitment of Construcciones El Condor S.A. Group (hereinafter the "Group") to integrity, the Group undertakes to implement an Ethics Hotline, which is a channel through which employees, suppliers, customers, contractors, managers, investors and the general public (hereinafter the "User" or "Users") may inform, free of charge and anonymously (if desired by the User), any conduct deemed to be contrary to the law or the rules and principles of good governance that govern the Group and which may affect its interests and good name (hereinafter, the "Ethics Hotline").

Channels means, Resguarda system, telephonic channel, [etica.elcondor@resguarda.com](mailto:etica.elcondor@resguarda.com) email or fax number which can be either accessed or consulted in the following link [www.resguarda.com/eticaelcondor](http://www.resguarda.com/eticaelcondor).

#### **I. Characteristics of the Ethics Hotline**

- Operated by external personnel, thus guaranteeing independence of the mechanism.
- The telephonic channel is available Monday through Friday, 8 am to 6 pm.
- Identity of the individuals who supply the information will be kept under strict confidentiality.
- Toll free.
- Different from the customer service line.
- Not a tool for complaints and claims, but for reporting conduct that is contrary to the law or the rules and principles of good governance that govern the Group.
- Not a tool for suggestions or dealing with personal issues.

#### **II. Conduct reported through the Ethics Hotline**

The following is a list that compiles the main behaviors that can be reported through the Ethics Hotline.

However, this list is illustrative and not exhaustive, and any other conduct that, in the opinion of the user, contravenes the law or the rules and principles applicable to the Group may also be informed by the user.

- Appropriation or improper use of resources or assets of the Group;
- Any irregular or fraudulent conduct that may threaten the Group and affect its principles and values;
- Any conduct contrary to the values that should guide the activities of the Group and its employees;
- Any irregularity in the allocation of the Group's assets;
- Failure by the Group's employees to comply with the obligations and prohibitions of the Employment Contract, the Internal Labor Regulations, the Code of Ethics and the procedures associated with their positions;
- Any abuse of the status of manager, officer or employee of the Group for their own benefit;
- Any conduct that facilitates or permits irregular or illicit operations;
- Any suspicion about the performance of wrong business practices;
- Acceptance of gifts, favors, donations, invitations, travel or payments by the Group's managers and employees that may influence their business decisions or operations for their own benefit in breach of the Code of Business Ethics;
- Omissions or lack of controls in processes or procedures regarding MLFT Risk Management Procedure;
- Any suspected activity of money laundering and terrorism financing;
- Any omission of the duty to prevent and control money laundering and terrorism financing in breach of the Code of Business Ethics;
- Any breach of confidentiality regarding the Information Disclosure Manual;
- Any non-observance of the duty to avoid conflicts of interest regarding the Conflicts of Interest Policy
- Any fraud within organizational processes;
- Any type of conduct that is contrary to labor relations policies (legal and organizational), employee quality of life policies, organizational climate in different working groups, occupational health policies and any form of workplace harassment;
- Any type of irregularity in the selection of employees.

### **III. Reporting obligation**

All employees, managers and shareholders of the Group are required to report any of the above conducts and, generally, any other behavior contrary to the law or the rules and principles applicable to the Group to the detriment of its interests.

#### **IV. Report management**

Reports will be handled by the Receiving Officials , which will carry out an investigation to verify if there is any conduct contrary to the law or the applicable rules and principles or, in its absence, if there is any unethical conduct that is contrary to the interests and good reputation of the Group, its policies or stakeholders.

Once the results of the investigation are obtained, the Group shall take the necessary corrective measures according to the situation. All reports received shall be received and managed in a reserved manner.

#### **V. Protection of information and complainants**

No director, employee, manager or the Group will perform hostile or harassing acts or conduct against any external person, customer, supplier, contractor, employee or manager who uses the Ethics Hotline, files a complaint or report, or makes a statement that affects an employee or any other person.

Any act of revenge, harassment or discrimination will be considered as a serious violation of the Code of Ethics and will be just cause for termination of the employment contract.

No action shall be taken against individuals who in good faith have reported events or irregularities that are subsequently dismissed by verification and investigation.

#### **VI. Officers responsible for control and approval**

This policy may be updated as recommended by the Audit and Risks Committee and shall be approved by the Board of Directors. Whenever it deems it necessary, the Audit , and Risks Committee will review this policy and propose such modifications as it deems appropriate.

Considering that this policy has a special impact on third parties and shareholders, once approved by the Board of Directors it must be published on the parent company and subordinates website.

Any changes made thereto must have the same level of dissemination.