1. Objective

The objective of this document is to establish the guidelines for the operation and use of the Ethics Line, as well as the reporting and investigation protocols.

2. Scope

This Program is applicable to RAGHSA, its subsidiaries, affiliates and/or companies under its control, its Directors, employees and contracted third parties.

3. General definitions

Ethics Line: It is a free and independent service that guarantees anonymity and confidentiality so that employees and third parties can report irregularities detected in the workplace.

Ethics Line Administrator: Independent person in charge of receiving complaints through the Ethics Line.

Ethics Committee: Responsible for receiving and analyzing the complaints received. It is composed of 3 (three) members, who may be directors of RAGHSA, as well as senior officers of the company, indistinctly. Its operation is regulated by the Audit Committee.

Audit Committee: Committee appointed by RAGHSA's Board of Directors.

Complaint: Report of situations such as those described in this Protocol, under section B)

B) TYPE OF COMPLAINTS

All employees may use the Ethics Hotline to report situations such as:
- Misappropriation or abuse of Company assets;
- Corruption or bribery;
- Money Laundering/Terrorist Financing;
- Workplace harassment or other forms of abuse of power or authority;
- Discrimination, racism, sexual harassment;
- Violation of applicable policies and laws;
- Violation of Company regulations;
- Falsification of documentation and information;
- Conflicts of interest;
- Other matters related to irregularities in ethical, legal, accounting, auditing and internal control issues.

C) PROTECTION AGAINST ALLEGATIONS OF CORRUPTION

The Company may provide protection to the whistleblower of acts of corruption, as the case warrants and as defined by the Ethics Committee.

D) NON-RETALIATION

Employees who file complaints in accordance with this Protocol shall be protected as soon as they disclose information in good faith, i.e., on the basis of a reasonable belief.

CONFIDENTIALITY AND ANONYMITY

The confidentiality of all complaints will be respected, therefore, the analysis, investigation and results will be kept confidential and will not be communicated to third parties other than those involved in the procedure described in this document.
The Ethics Line system gives anyone the possibility to file a complaint or concern while maintaining anonymity, so it is possible to choose not to share personal data.

4. PROCEDURE

A) RECEPTION OF COMPLAINTS

The Administrator of the Ethics Line will be responsible for receiving all those complaints made through the Ethics Line. They can be done by telephone or via email or through the website.
Reporting channels provided by the Ethics Line Administrator (Resguarda):

Email: integridad.raghsa@resguarda.com

Website: www.resguarda.com/integridad.raghsa

Telephonically:

Argentina: 0-800-999-4636 / 0-800-122-7374

United States: 1-800-921-2240

Other available reporting channels: direct contact with the Compliance Management.

B) REPORTING OF COMPLAINTS

Within 48 hours of receiving the complaint, the Administrator of the Ethics Line will send a report to the Compliance Management, detailing the code, content and details of the irregularity reported through the line.

In the event that the complaint involves any of the members of the Ethics Committee, and/or the Compliance Manager, such complaint will be forwarded by the Administrator of the Ethics Line directly to *the CEO of the Company.*

C) RESEARCH

Preliminary Review

The Compliance area will communicate each of the complaints received to the Ethics Committee in order to establish whether they require an investigation process, or the taking of relevant actions.

Research & Recommendations

In the event that, according to the preliminary analysis above, the complaint requires an investigation process, it may be carried out with internal personnel or with contracted/outsourced personnel, as determined by the Ethics Committee.

Once the investigation has been carried out, the Compliance area will share the results with the Ethics Committee, including recommendations, corrective actions and sanctions if applicable, for review and analysis.

The Ethics Committee will issue a decision on the case in question, which will be communicated to the complainant through the Ethics Hotline.

Finally, the Ethics Committee may suggest plans or improvements in processes so that they can be implemented internally in the Company.

Internal Reports

On a quarterly basis, the Compliance area will send the Ethics Committee a report on the status of the Ethics Line.

On a quarterly basis, the Compliance area will send a summary of the situation of the Ethics Line to the Audit Committee, safeguarding confidential data.

5. LIABILITY

The Company's Compliance Manager and Ethics Committee are authorized to modify and update the Compliance Program, as necessary, to maintain compliance with all applicable laws and treaties.

REFERENCES

Code of Ethics
Ethics Line Protocol
Anti-Bribery
Gifts, Sponsorships, Donations, and Contributions