



## MRV'S GROUP WHISTLEBLOWER NON-RETALIATION POLICY

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### 1. OBJETIVES

Establish rules to protect those involved in internal investigations and whistleblowers who, in good faith, report conduct or facts that violate the guidelines of the MRV Group Code of Conduct or applicable laws.

### 2. COVERAGE

This whistleblowers non-retaliatory policy covers all MRV Group, its employees, partners, suppliers and other relationship groups (shareholders, investors, clients, real estate agents, accredited brokers, public authorities, representatives of regulatory agencies, municipalities, , Representatives of private entities, etc.).

No employee, partner or supplier can claim, in any case, ignorance of the guidelines provided herein.

### 3. SPECIFIC CONTENT

#### 3.1. Guidelines

- Those involved in internal investigations and complainants who, in good faith, contribute with information regarding any fact or posture that violates MRV



Group Code of Conduct or the laws in force, shall not be subjected to any type of retaliation, punishment, persecution and/or any form of embarrassment;

- The whistleblower identity, if informed by him, must be strictly protected;
- MRV Group will not tolerate any act that directly or indirectly impairs the whistleblower who, by reason of suspicion or certainty, denounces actual or potential facts and/or conduct that violates the rules provided for in laws or the guidelines contained in the Code of Conduct.

### **3.2. Possible Punitions to be applied**

Failure to comply with this policy will result in disciplinary action. These are punishable by:

- Written warning (personal and legal department should be involved);
- Suspension (must involve the Legal department);
- Dismissal without due cause;
- Dismissal for just cause (personal and legal department must be involved);
- Exclusion of the supplier, partner or contractor of MRV Group;
- Assessment of appropriate legal actions (must involve the Legal department).

