



BUSINESS CODE OF ETHICS

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Foreword

The Board of Directors and the General Management have approved the issuance of this Code of Ethics, which includes the values and principles on which the Company is governed.

Its purpose is to unify criteria and guide the actions of investors, directors, managers, suppliers, contractors and collaborators of JAVER towards clients, competitors and the general public; promoting an environment of reciprocity between everyone.

The Code has established a frame of reference based on the rationale of our organization (Mission) and the principles that inspire our daily behavior (Values), adhering to applicable laws and provisions.





Message from our CEO

JAVER has distinguished itself by its ability to adapt to changes, without a doubt this quality added to the value and enthusiasm that each of our collaborators contributes. It has become the largest housing development company in the country in recent years.

This achievement and satisfaction also implies a great responsibility, we must maintain the leadership achieved with ethical and respectful conduct with all stakeholders with those whom we relate: shareholders, investors, collaborators, suppliers, clients, authorities, society and the environment.

Therefore, we have given ourselves the task of disseminating our Code of Ethics, which must serve as a guide to conduct. In this document you will also find the new definition of the Vision and Mission of the Company that were approved by our Board of directors.

At JAVER we are committed to knowing and complying with the established principles in this Code of Ethics.

I invite you to read it and use it as a tool to guide our decisions and actions when necessary, so with the support and commitment of each of us we will continue consolidating and strengthening this great company JAVER.

Ing. René Martínez Martínez

OBJECTIVE

Establish the behavioral guidelines that we expect from our investors, directors, managers, collaborators, suppliers and contractors; with the purpose of informing them to the responsibilities and implications of working with the Company, which guides the way to establish business relationships with ethics and professionalism.

Indicate the sanctions to which those must adhere to who commit offenses against our Code of Ethics.

SCOPE

This Code is mandatory for all investors, directors, managers, suppliers, contractors and collaborators; therefore, they must know and understand this Code and sign the declaration as well as its updates indicating full knowledge and attachment to it. We make the Code of Ethics through official means for its observance and compliance.

The situations not provided for in this Code, must be resolved according to the sound criteria of the administration. In case of doubt, the Ethics Committee should be consulted or ultimately the Audit and Corporate Practices Committee of the Board of Directors.

The particular observance of some ethical conflicts is described in the "Policy Business Ethics and Conflict of Interest "which regulates the standards ethics for officers and collaborators of the Company; as well as the "Policy of Transactions with Related Parties "that establishes the rules of operation with Themselves.

CULTURE OF THE ORGANIZATION



CULTURE OF THE ORGANIZATION

MISSION:

Offer quality housing solutions to meet the housing and economic needs of our clients, based on our values and human resource.

VISION:

To be a leading company in its field, which adequately adapts to the changing needs of the market, maximizing the expectations of each of our stakeholders in a sustainable manner.

VALUES:

Values support us to choose decisions for the common good, the values that are lived in JAVER are:

Integrity: We are consistent with our principles and values, acting with transparency and honesty.

Sustainability: We manage the efficient use of resources generating social, economic and environmental value over time, building communities and setting the course of their development.

Passion: We make the ordinary something extraordinary, placing our seal of approval and executing things right the first time.

Innovation: We constantly evaluate what we do, keeping open to creative ideas that allow us to be agile in adapting to change and making decisions.

Identity: We generate a sense of belonging and commitment of human talent through the development of their capacities and aspirations, coordinating efforts and talents to achieve goals.

Respect: We promote a positive work and business environment with empathy and fairness.

OUR COMMITMENT



INVESTORS

We protect your assets, and are focused on obtaining the return and security of your investment.

We are profitable, maintaining a solid and competitive position in the national market.

We disclose the relevant financial information in accordance with the current provisions of the IFRS international financial reporting standards and their interpretations for consolidated information. Likewise, we adhere to the local provisions of the NIF financial reporting standards and their interpretations for subsidiaries, as standard in the internal procedure of "Accounting Closing and Issuance of Financial Statements".

THE ORGANIZATION

We seek that the entire value chain join forces to achieve the key objectives of the defined short and long term performance.

We work generating synergies with all involved in the organization to be the leading company in the market and maintain sustained growth.

GOVERNMENT RELATIONS

We maintain transparent, honest relationships and are in compliance with laws, regulations, and Company policies and procedures, as well as any applicable legal provision in the exercise of our functions. It is our responsibility to know and comply with them without exception.

In case of doubts about the practical applicability and /or compliance with any legal provision to make the corresponding query, prior to making any decision that could lead to non-compliance with the applicable provisions, we must also report any anomaly or deviation that we identify.

INDUSTRY

We work and cooperate with the common objectives of the sector through participation in the different chambers and associations that promote housing in the country.

We contribute to the development of the industry through new projects that keep the economy of the sector active.

COMPETITORS

We promote healthy and fair competition among participants in the real estate sector, respecting the principles and regulations of fair competition and good practice of business.

We do not participate in agreements that seek to limit the free play of market forces and we do not use inappropriate means, to improve our competitive position in those markets.

We avoid making false comparisons or misleading with equivalent products and / or services offered by competitors. When it is necessary to make statements about the competition, they must be fair, objective and complete.

CUSTOMERS

We offer a fair and honest treatment, providing the goods and services with an adequate relationship between price and product in each segment of the market and place in which we participate.

We adhere at all times to official regulations and internal regulations of the company.

We promote our product following current legal regulations and the principles that derive from this Code, as well as what is established in the "Brand Use Manual".

COLLABORATORS

We promote tolerance towards the diversity and differences of our human resource, generating a harmonious work environment that capitalizes on individual talents in a collective way.

We offer an excellent quality of life at work, with wide possibilities of development and income commensurate with responsibilities and results.

We respect the rights of our employees through fair performance evaluations and equal opportunities, avoiding discrimination and granting the right to a trial just before sanctions or dismissals.

We drive job promotion decisions based on knowledge, talents and skills. Granting equal opportunities and wages between gender, attached to the principle "equal jobs, equal wages".

We provide training and safety equipment as well as tools required by the type of work performed, since we are committed to the safety of our collaborators.

SUPPLIERS AND CONTRACTORS

We seek long-term relationships of trust and mutual benefit based on service, quality and price.

We always act with transparency, ensuring equal opportunities, respect and integrity, as well as the safeguarding of privileged information that derives from our business relationship.

We promote our values and ethical guidelines by initiating all our business relationships with the delivery of the Code of Ethics to the supplier or service provider, Obtaining the signature commitment of your legal representative or the person with whom you formalize the business relationship.

SOCIETY

We are committed to the growth of the country, so we work to facilitate the development of the communities in which we operate.

We seek to be a socially responsible company participating with organizations and community support associations.

We carry out activities that benefit the quality of life of the communities in which we are present, promoting programs that do so in a sustainable way.

ANTI CORRUPTION / ANTI BRIBERY

We are responsible for establishing the necessary conditions that allow ethical and responsible interaction with each public servant with whom we interact as part of our responsibilities, therefore it is essential to know, understand and adhere to applicable anti-corruption laws and the current regulatory framework.

We guide our actions in accordance with the highest ethical standards, so we refuse to engage in acts that violate the integrity of our actions and we put before any benefit the fulfillment and adherence to the applicable legal provisions.

We are committed to integrity and adherence to legality, so we refrain from participating in activities such as requesting, receiving or offering any gift, payment or gratification in exchange for personal benefits, to obtain or maintain some negotiation, or to receive preferential treatment by third parties related to the company.

Giving or receiving bribes violates our values and policies and involves an illegal act, with serious repercussions for the organization.

HUMAN RIGHTS

We act in accordance with the Universal Declaration of Human Rights, recognizing the dignity of people, respecting their freedom and privacy in accordance with the applicable laws.

Likewise, we adhere to the Declaration of Principles of the Global Pact of United Nations, where guidelines are established in labor matters,

environmental and anti-corruption.

We refrain from discriminating on the basis of race, age, gender, marital status, religion, political affiliation, nationality, physical or social condition, among others.

HARASSMENT

The well-being of our collaborators is a priority, therefore we undertake necessary measures to prevent any type of harassment, whether sexual, or work related and / or intimidation that degrades the integrity of our collaborators, in the same way we reject all conduct of this nature by collaborators towards any person related to the organization, avoiding humiliations, transgressions or acts that violate their integrity, regardless of whether there is a hierarchical relationship between those involved.

ENVIRONMENT

We promote respect for the environment by adapting sustainable practices that comply with the environmental regulations applicable in our country.

We develop our activities within a global framework of environmental protection, promoting the emission prevention and control principle.

We promote environmental awareness of all staff, emphasizing the reuse and recycling of materials. We manifest our commitment to the Environment through compliance with our "Environmental Policy", seeking to maintain balance with the flora and fauna of each region.

RESPONSIBILITIES



BOARD OF DIRECTORS

Authorize the issuance of this Code, as well as the approval of its updates.

Instruct the Secretary of the Board to disseminate the Code of Ethics among shareholders and members of the Board of Directors seeking their signature of acceptance on the Charter Commitment of said Code.

COUNSELORS

Adopt this Code of Ethics assuming the responsibility of its compliance by signing acceptance in the Letter of Commitment and its updates.

AUDIT AND CORPORATE PRACTICES COMMITTEE (CAPS)

Monitor compliance with the Code of Ethics.

Evaluate possible ethical conflicts that could have a considerable impact on the Company.

Present the proposals for the adaptation of this Code to the Board of Directors for their approval.

MANAGERS

Know and promote compliance with the Code of Ethics and internal policies at all levels of the Company.

Ensure that your direct collaborators work within the established framework in the Code of Ethics and the internal policies of the Company.

Renew the commitment to the Code of Ethics by signing the Charter Engagement and its updates.

ETHICS COMMITTEE

Guide staff in the correct interpretation of the provisions of the Code of Ethics and resolve any questions regarding it.

Resolve any conflict regarding an ethical incident.

Report periodically to the Audit and Corporate Practices Committee (CAPS) ethical conflicts received from the complainants; as well as its status of attention.

COLLABORATORS

Know and comply with the Code of Ethics and ratify their commitment in each update signing of acceptance the Letter of Commitment of the same.

Incorporate into the work culture the ethical conduct described in the Code of Ethics.

Report any ethical conflict through the anonymous reporting means arranged by the Company.

Know and comply with all applicable laws and regulations governing your area of responsibility; as well as the regulations, policies and procedures of internal control established by the administration.

Assume the commitment to provide competent services while maintaining a loyal, respectful and honest conduct, avoiding any conflict of interest of in accordance with the provisions of the Company's internal policies.

HUMAN RESOURCES

Disseminate the Code of Ethics among staff by physical and / or electronic means and request the signing of the Letter of Commitment, as well as request its publication in the official means provided by the Company.

Carry out the dissemination of the anonymous reporting means provided by the Company.

INTERNAL AUDIT

Notify the Audit and Corporate Practices Committee of any non-compliance to the Code of Ethics and /or internal policies of the Company, which are known to you.

Monitor that corrective measures are carried out as determined by the Company to proven cases of violations of the internal Code of Ethics and policies.

MANAGEMENT OF
INFORMATION AND
PRESERVATION OF
DOCUMENTS AND ACCESS
TO PRIVILEGED
INFORMATION



MANAGEMENT OF INFORMATION AND PRESERVATION OF DOCUMENTS AND ACCESS TO PRIVILEGED INFORMATION

Investors, directors, managers and collaborators who have access to privileged information and / or relevant part of the Company must keep absolute confidentiality of the information to which they have access in accordance with the laws issued on the market value and according to the provisions of the internal policy of "Operations with Values".

PERSONAL DATA PROTECTION

We collect and process personal data derived from business relationships with responsibility and security, complying with the Federal Data Protection Law Personal in Possession of Private Parties and our "Data Protection Policy".

INFORMATION PROTECTION

The information collected from the Company's own activities is protected from either physical or electronic form in accordance with the security measures and the terms stipulated the fiscal, financial and legal laws that regulate us in the country.

ETHICAL CONFLICTS COMPLAINT SYSTEM

We are aware of the importance of maintaining an environment of values and principles that is reflected in an adequate behavior on the part of our investors, directors, managers, suppliers, contractors and collaborators.

For this reason, we have established a confidential reporting system in order to offer an adequate and secure communication channel so that they can report personally or anonymously, any irregular act or violation of the guidelines contained in the Code of Ethics and / or applicable regulations, whether internal or external, without fear of retaliation.

The reporting system is available to the general public 24 hours a day, all the days of the year and is administered by a third party who receives the complaints through the following means:

- 1.** Toll-free telephone line: 01 800 062 2646
- 2.** Website: <https://www.lineadedenuncia.com/eticajaver>
- 3.** E-mail: eticajaver@lineadedenuncia.com

**INFORMATION MANAGEMENT AND PRESERVATION OF DOCUMENTS
PROTECTION SYSTEM TO COMPLAINANTS**

Complaints received through any of the established channels must be treated as strictly confidential.

It is forbidden to fire, suspend, threaten, harass, degrade or in any other way discriminate for providing information or participating in research that presumes the breach of any provision established in the internal policies of the Company and / or the provisions of this Code.

In order to give the necessary seriousness to all the comments received, these are analyzed and evaluated by our Ethics Committee and communicated to the Audit Committee and Corporate Practices and the General Management.

SANCTIONS

Failure to comply with this Code, whether due to ignorance, distraction or negligence, will lead to the application of reprimands and administrative sanctions, labor and / or criminal, as stipulated in the "Procedure for Reprimands and Sanctions".

The Ethics Committee will be competent and must be aware of irregular acts or violations of the guidelines contained in the Code of Ethics or violations of applicable regulations, and whether internal or external, as well as the lack of observance of internal controls and will have the powers for its attention, follow-up and solution. It will be your responsibility to communicate to the competent areas of the breaches that have been identified for their investigation.

Once the solution has been defined, the Ethics Committee must notify the Management responsible for the actions to be taken by virtue of the seriousness of the fault; as well as the General Management and to the Audit and Corporate Practices Committee for their knowledge.

Lack of application of sanctions for breaches identified to any guideline of this Code, will be considered a serious violation of it.

EMPLOYEE COMMITMENT LETTER

PLACE AND DATE:

I _____

As a Javer worker I commit myself and assume my obligation to know, spread, comply with and enforce this Code of Ethics and that I understand in all its terms my obligations regarding compliance with the principles, policies and everything that describes the same.

I declare that I have not carried out any activity that goes against the provisions of the this Code, the related Policies and Procedures. In case of having knowledge of any situation that is contrary to what is described in the present, I promise to report it by the means implemented for that purpose.

I adopt this Code as a daily guide for each of the activities inherent to my position, assuming it is part of my job responsibility; However, does not constitute and should not be construed as establishing an employment contract for indefinite time, nor a guarantee of continuity with JAVER.

By means of this manifest I have received a copy of the Code of Ethics and I understand that it is published on the official website of JAVER Internet <http://javer.com.mx>

NAME AND SIGNATURE

EXTERNAL COMMITMENT LETTER

PLACE AND DATE:

LETTER OF COMMITMENT FROM SUPPLIERS, CONTRACTORS AND / OR EXTERNAL PERSONNEL WHO PROVIDE THEIR SERVICES IN THE FACILITIES OR DURING THE OPERATIONS WITH JAVER AND THEIR CODE OF ETHICS

I _____
_____ As a worker and / or Legal Representative of _____ (name of the provider that provides services to JAVER), according with the provisions of the clause "Adherence to the Code of Ethics" of the service contract of services between my employer on the one hand and JAVER on the other, dated _____ (dd of Month of Year), I undertake and manifest my obligation to know, disseminate, comply with and enforce the JAVER Code of Ethics, and that I understand in all its terms my obligations regarding compliance with the principles, policies and everything that describes the same.

Likewise, I express my commitment to adopt and live it as a daily guide to each of the activities inherent to my position and job responsibility, while my employer _____ (name of the provider that provides services to JAVER) keeps me assigned to provide services to this Company, however, this does not constitute nor should it be construed as establishing an employment contract with JAVER.

I declare that I was given a printed or electronic copy of the Code of Ethics and I also understand that this is published and I can consult it on the page JAVER Internet official <http://javer.com.mx> and that any fault related to itself, will be sanctioned as stipulated in the employment relationship contract.

NAME AND SIGNATURE

COMMITMENT LETTER BOARD OF DIRECTORS

PLACE AND DATE:

JAVER BOARD OF DIRECTORS COMMITMENT TO THE CODE OF ETHICS

I _____

As a member of the Javer Board of Directors, I commit myself and assume my obligation to know, disseminate, comply with and enforce this Code of Ethics that I understand in all its terms my obligations regarding the fulfillment of the principles, policies and everything that describes it.

I declare that I have not carried out any activity that goes against the provisions of the this Code, the related Policies and Procedures. In case of having knowledge of any situation that is contrary to what is described in the present, I promise to Report it by the means implemented for that purpose.

I adopt this Code as a daily guide for each of the activities inherent to my position, assuming it is part of my responsibility.

By means of this manifest I have received a copy of the Code of Ethics and I understand that it is published on the official website of JAVER <http://javer.com.mx>

NAME AND SIGNATURE



www.javer.com.mx/en