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Anti-Bribery and Anticorruption policy
(ABC)

Date of update: December 9th, 2019

PROTECCIÓN DINÁMICA AGENTE DE SEGUROS Y DE FIANZAS, S.A. DE C.V.
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Scope

The Anti-Bribery and Anticorruption policy is applicable to all employees (full-time and part-time) and temporary workers, as well as consultants, advisors and short-term or stable workers, collaborators and directors of Protección Dinámica Agente de Seguros y de Fianzas, S.A. de C.V. (hereinafter PRODISA), who must follow at all times what is established therein, regardless of the country where they are located. It is also applicable to suppliers, representatives or third parties acting on behalf of PRODISA.

As part of this commitment, PRODISA has a zero-tolerance policy for bribery and corruption of any kind. This includes complying with all applicable anti-bribery and anticorruption (ABC) laws in Mexico, including the Foreign Corrupt Practices Act, as we are committed to working and partnering only with those who share this commitment.

Performance Guidelines

In the development of the principle of integrity, established as a pillar of behavior in our Code of Ethics and Conduct, we have adopted the Anticorruption Policy as a general guide for action and decision making that helps to avoid materializing in our business any act that, directly or indirectly, may constitute bribery, corruption or contrary to the applicable regulations for interaction with national or foreign authorities or public officials (hereinafter Authorities)¹.

Based on the foregoing, we expect the recipients of this policy to act at all times in accordance with the following Guidelines:

Relationship with Authorities

Our interactions with Authorities on behalf of PRODISA are cordial and respectful. In the event that their decisions are contrary to the interests of the company, they will be questioned through the legal mechanisms defined by the regulations applicable in each country and refraining from exercising any undue pressure.

Before entering into agreements or contracts with Authorities, we review the applicable regulations and request support from the company's legal team in order to fully comply with all applicable requirements.

We do not hire or offer work to representatives of Authorities who have or have recently had a relevant role in matters that directly affect the interests of PRODISA. In any case, the hiring of employees or former officials of the Authorities must comply with the regime of disabilities, incompatibilities or impediments that may be applicable.

¹ For the purposes of this policy, the term Authorities shall be understood as any entity or public official acting on behalf of any State, department or territorial entity and/or performing public functions.

Prohibition of bribery and facilitation payments

We do not offer, promise, agree or grant, directly or through intermediaries, favors, payments, attentions or gifts to national or foreign authorities, their relatives or third parties related to them, with the intention of influencing their actions, decisions, omissions or functions of their official positions or to obtain undue advantages. Likewise, we refrain from making facilitation payments, understood as those that seek to ensure or expedite the administrative actions or routine discretionary procedures of any authority.

Meals or symbolic or institutional gifts or attentions to Authorities may be granted occasionally if they have the sole objective of strengthening relations with the company, provided they are reasonable in terms of their value and frequency and are in accordance with the applicable regulations. We never grant cash or equivalent gifts or attentions that can be interpreted as a way of unduly influencing the objectivity of the Authorities.

We prohibit the use of employees' own funds to circumvent the prohibition of bribery established in this policy. In addition, under no circumstances do we grant bribes through third parties outside PRODISA, such as insurers, surety companies, service providers, advisors, consultants, partners, representatives, suppliers or other intermediaries acting on behalf of the company.

Contribution to charities

The contributions and donations that PRODISA makes to charities, foundations, associations, non-governmental organizations or non-profit institutions will always have a lawful purpose and will never serve to cover acts of corruption or bribery up.

Business Partners

PRODISA is committed to promoting compliance with anti-bribery laws and policies with its business partners (insurers, surety companies, service providers, advisors, consultants, partners, representatives, suppliers, or others) who are strictly prohibited from participating in, or committing bribery, since all agreements and contracts with business partners must be subject to clear contractual terms, including specific provisions that require them to comply with the minimum standards and procedures regarding acts of bribery and corruption.

Books, accounting records and internal controls

In the event that we make any of the contributions, inputs or attentions allowed in this policy, the accounting record thereof must be clear, correct, accurate and reliable since all our transactions are transparent, fully documented and codified in accounts that reflect exactly its nature. We do not conduct behaviors tending to hide, change or omit accounting records to hide improper activities. Likewise, we have an adequate accounting and internal monitoring and control system for these records in order to keep the books and records fair and accurate.

Audit

The systems, processes, policies and controls implemented to ensure compliance and execution of this and other policies are subject to periodic internal audits that may include a general assessment and evaluation, including their suitability of local systems, processes, policies and practices.

Breach

Failure to comply with the Anti-Bribery and Anticorruption Policy (ABC) will constitute a violation of the employment or commercial contract with PRODISA and lead to the application of sanctions that may imply termination of the labor or commercial relationship, as well as fines, administrative or criminal sanctions. “Ignorance or inadequate understanding of this policy does not entitle its recipients to breach it”.

Related policies, documents and forms

All employees, including new ones, must periodically sign the acknowledgement confirming that they have read the Anti-Bribery and Anticorruption Policy (ABC) and agree to comply with its provisions.

The Anti-Bribery and Anticorruption Policy (ABC) does not consider all the behaviors of the work environment since Protección Dinámica has additional policies, manuals and procedures that consider behaviors not contemplated by this policy:

- Disclosure and Access to Information Policy.
- Confidentiality for Employees Policy.
- Training Policy.

Glossary

ABC Policy: for its acronym in English: Anti-Bribery and Corruption, is this Policy, its appendices and any of its procedures or implementation guidelines.

Bribery: is the offer, promise or delivery of anything of value to any person or entity with the intention of inducing or rewarding him/her to obtain or retain a commercial advantage in a corrupt or inappropriate manner.

Business Partners: include any business partner such as insurers, surety companies, service providers, advisors, consultants, partners, representatives, suppliers or other intermediaries acting on behalf of the company.

Donations: anything of value (monetary or material) delivered to an entity recognized as a charity under the Mexican law or that is otherwise qualified to receive a charitable donation for the purpose of helping non-profit, with a lawful purpose and without ever obtaining commercial advantage.

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Note: The English translation of the Anti-Bribery and Corruption uploaded in Prodisa's website is a courtesy only. In any case, the terms of the Spanish versions will prevail.