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The accurate point of reference
for your protection and
effective management of your risks

CODE OF ETHICS AND CONDUCT

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PROTECCIÓN DINÁMICA, AGENTE DE SEGUROS Y DE FIANZAS, S.A. DE C.V.
Periférico Sur 5452, Olímpica, Coyoacán, Mexico City, Zip 04710, Mexico
Phone: +52(55) 5549 3680, 5484 0900 y 5447 0400
info@protecciondinamica.com
www.protecciondinamica.com

Ethics and Conduct Code

OBJECTIVE

The Code of Ethics and Conduct contains the values and principles that are part of the Business Philosophy of **Protección Dinámica, Agente de Seguros y de Fianzas, S.A. de C.V.** (hereinafter, the Company, the Society or PRODISA), who have distinguished themselves throughout their history for their strict adherence to Business ethics standards, rules for doing business, for their full compliance with the Laws that are applicable to them and, above all, for offering the best service to their clients, for which they have earned an impeccable reputation within the Sector, being an example of integrity and reliability in the intermediation of insurance and bonds.

Through the issuance of this Code, it is intended to establish a directive that guides and gives full certainty about the desirable behavior that employees and other people who have any relationship with the Company must observe in carrying out their activities and in their dealings with other employees, clients, insurance and surety institutions, Supervisory Authorities and other persons of interest, to build and/or maintain relationships of respect, courtesy and trust, as well as to provide them with the necessary tools for decision-making in situations involving ethical dilemma that present in the performance of their activities.

AREA OF APPLICATION

This Code is mandatory for all people who provide their services in PRODISA, directly or indirectly, whether they are part of the Board of Directors, executive staff, officials, employees or advisors (hereinafter, **related subjects**), so its knowledge and understanding in order to ensure proper compliance is essential. For this purpose, the aforementioned persons must state in writing and under oath to tell the truth, that they know the content of this document, as well as that they are obliged to observe it through their signature, either when taking a job in the Company, or when making any modification to this Code.

It is important to remark that all subjects related to the Company will additionally have the duty to cooperate in investigations of possible breaches of this Code and other activities that, according to their powers, the Ethics Committee of the Company must carry out.

The content of this Code is disseminated extensively to our clients, Insurers, Surety Companies and the general public through the Company's website, to provide them certainty about the ethical treatment that they must receive from PRODISA employees, thereby complying with the principles of Corporate Governance established in the applicable Law on Insurance and Surety Institutions and the Single Insurance and Bonds Notice.

BUSINESS PHILOSOPHY

Protección Dinámica, Agente de Seguros y de Fianzas, S.A. de C.V., has the following Mission and Vision:

Mission

To provide our clients, both individual and entities, a wide range of integrated services that meet their needs and expectations, offering the best solutions and always seeking the best cost-benefit in the products offered without sacrificing quality, guaranteeing excellence in the service.

Vision

Being an efficient and effective advisor in risk management programs and in the placement of insurance and bonds, operating with high quality standards and continuous improvement in the provision of services for the benefit of our clients, as well as being an agent of change in the mechanisms of commercialization of insurance and bonds, in order to contribute to the modernization of the sector and in the promotion of the culture of Insurance and Bonds in Mexico.

The Values, Principles and Rules of Conduct that make up PRODISA's Business Philosophy are as follows:

VALUES

Integrity

It is the fundamental principle on which PRODISA's Business Ethics rests, which implies moral integrity, rectitude and honesty in the conduct of the subjects related to the Company; that is, a person of integrity is one who always does the right thing without affecting the interests of other individuals, or those of the Company.

Dignity

It is an ethical value and a Human Right, which consists of the quality of asserting oneself as a human being, behaving responsibly, seriously and respectfully towards oneself and towards others, as well as being respected by other people.

Honesty

It consists of having a congruent behavior between what is thought, said and done. It implies authenticity and builds trust.

Righteousness

It is to conduct oneself righteously without using their employment or position within the Company to obtain or try to obtain any benefit or personal advantage or in favor of third parties; nor require and/or accept compensation or economic benefits from any persons or organization with which they have dealings by virtue of matters that have been assigned to them, being fully aware that this compromises the objectivity of their functions.

Honorability

It is related to acting honestly, being the honorable person the one worthy of respect and admiration from other people.

Responsibility

It is a value that implies the commitment to act correctly in all aspects of life and accept the consequences of one's actions.

Commitment

This value consists of the subjects related to the Company putting all their efforts and capacity to fulfill their activities, beyond what is expected of them, always trying to achieve excellence for the benefit of customers and the Company itself.

Loyalty

It is the act by which the subjects linked to the Company make the mission, vision and objectives of the organization their own. This value implies a sense of belonging to the company, as well as respect, loyalty and gratitude towards it.

Respect

It consists of the recognition of the value of the people with whom one interacts, of things and of one's own worth. It is a fundamental value for the daily performance of the subjects related to the Company, as well as for their interaction with other people, whether they are internal or external clients of the Company, which will allow the relationships in which they intervene to develop in a cordial and kind environment.

PRINCIPLES

Legality

It is strict compliance with internal regulations (Manuals, Policies, Procedures, etc.) and external regulations (Laws, Regulations, General Administrative Provisions, etc.) applicable to PRODISA.

Transparency

It consists of the dissemination of information to the general public about the organization and operation of the Company, in order to demonstrate that is acting is legal, honest, incorruptible and without conflicts of interest. It is also an obligation of the subjects related to PRODISA by virtue of which their daily behavior and the performance of their activities must be perceptible and clear.

Collaboration

It means working together with others, always promoting teamwork in an environment of cordiality, respect and trust, as well as supporting colleagues if they require it, with a spirit of solidarity and generosity regardless of the hierarchical level or area of ascription.

Impartiality

To act in the exercise of assigned activities with neutrality and equanimity without causing harm or granting undue preference or privileges to some people over others. That is, give equal treatment to all the people with whom you have interaction.

Gender Equality

It is based on the fact that both women and men are treated equally, as well as having access under equal conditions and opportunities to vacant positions in the Company and to the services they provide.

Equality, Non-Discrimination and Human Rights

It involves behaving towards all the people with whom they have contact in the performance of their activities without distinction on preference based on ethnic or racial origin, skin color, gender, age, disabilities, social, economic or health or legal status, religion, physical appearance, body art, genetic characteristics, immigration status, pregnancy, opinions, sexual preferences, political affiliation, marital status, language, criminal record, or for any other reasons that could generate discrimination or any other violation of the Human Rights of people who have any relationship with the Company.

Service Attitude

PRODISA's essential objective is to provide customers with excellent service that meets their needs and expectations. It should not go unnoticed that each employee also has internal clients and other external clients to whom they must provide an excellent service for the fulfillment of the Company's objectives, since the work that each collaborator carries out has an impact on that of the others, that is, each person is part of an indivisible whole, which is the Company, regardless of their area of ascription.

Confidentiality and Protection of Personal Data

Employees and other subjects related to PRODISA have the duty to act with confidentiality, prudence, care and secrecy in handling the information to which they have access by virtue of the position and activities under their responsibility. Likewise, they are responsible for the conservation, security and integrity of such information, according to the terms of the Law on the matter.

No conflict of interest

The subjects related to the Company must avoid participating in activities in which they have a conflict of interest. The aforementioned conflict arises when an individual has a direct labor, personal, professional, family or business interest that may affect the impartial, objective and legal performance of their duties. In these cases, the person who was a conflict of interest of any kind in any matter assigned to them, must communicate it in writing to their immediate boss, in accordance with the provisions of the **Policy to Prevent and Avoid Conflicts of Interest**.

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Responsible Use of Resources

PRODISA employees must use the resources provided by the Company sensibly, avoid waste or improper use, seeking saving with a vision of rationality and austerity. It also implies allocation the organization's resources exclusively to the fulfillment of its objectives and goals.

Resources Optimization

It lies in an efficient use of the resources available in the Company for the fulfillment of its objectives.

Efficiency

To act adhering to a culture of service aimed at achieving the Company's objectives with the minimum use of resources.

Health & Security

The subjected related to the Company must avoid putting their health or personal integrity or that of other people at risk, refraining from performing any dangerous, unsafe or harmful act, as well as complying with the provisions referring to Sanitary Security and Civil Protection established by the Company in observance of the applicable Law in such matters.

Conservation and Improvement of the Environment

The Company will carry out environmental education actions in favor the related subjects, so that they work in an eco-responsible manner. Likewise, PRODISA will fully comply with the legal provisions on Environmental Protection, always promoting activities aimed at the reuse, reduction and separation of waste, as well as the saving of the resources such as water, electricity and paper.

Social Responsibility

It is the commitment assumed by the Company to benefit its social environment through job creation. Likewise, PRODISA will contribute to the strengthening of the Insurance and Bond culture in Mexico through the expansion of the offer of products and services in these matters among different sectors of the population.

RULES OF CONDUCT

All PRODISA **employees** must conduct their daily activities in accordance with the values and principles mentioned above, as well as observing the following rules of conduct, which are listed in an expository but non-limiting manner, since human behavior and interpersonal relationships are highly complex, which is why any ethical conflict that is not provided for in the following rules must be submitted for consideration to the Ethics Committee:

- ✓ To comply with internal regulations (Manuals, Policies, Announcements, Instructions, Memoranda, etc., issued by the Company) and external regulations (Laws, Regulations, General Provisions, etc.) applicable to the Company.
- ✓ To conduct themselves with dignity towards their person and respect their colleagues and other people with whom they have contact by virtue of their work, treating them with kindness and cordiality.
- ✓ To respect and enforce the lines of command established by the Company.
- ✓ To provide effective cooperation, as well as to promote adequate communication between the different levels and areas of the Company.
- ✓ To build work relationships on mutual respect and professional collaboration, avoiding offensive behaviors and attitudes, coarse, arrogant or abusive language.
- ✓ To respect the free expression of the ideas of other co-workers.

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- ✓ To recognize the merits obtained and the contributions of other employees, without appropriating their ideas or initiatives.
- ✓ To avoid making malicious comments regarding other PRODISA employees that could endanger their reputation, as well as creating or spreading gossip or rumors within the Company.
- ✓ To recognize and encourage outstanding performance from other employees.
- ✓ To observe honest conduct towards the people and assets of the Company, as well as the personal belongings of others.
- ✓ To provide information, advice or guidance requested by the collaborators to carry out the work under their responsibility.
- ✓ To perform the duties and obligations of the position held effectively and efficiently, with a sense of responsibility and dedication to service for the benefit of customers, which will increase the good reputation and credibility of the Company.
- ✓ To avoid carrying out any action that distracts or disturbs the Company's employees.
- ✓ To respect the Company Dress Code.
- ✓ To report to the Ethics Committee any act contrary to the internal and external regulations applicable to the Company.
- ✓ To refrain from unnecessarily delaying the tasks assigned to them or from using work time to attend to matters that are not related to the functions under their responsibility.
- ✓ To avoid using any form of aggression, harassment, bullying, intimidation, threats and discrimination towards employees and other people with whom they have dealings by virtue of their work, as well as taking advantage of their hierarchical position or abusively exercising it.
- ✓ To keep the due confidentiality of the information obtained or to which they have access due to the exercise of their functions, which should only be used for the strict fulfillment of it, refraining from using such information for their own benefit or that of third parties, as well as disclose or transmit it, unless required by the competent Authority.
- ✓ To keep their workplace tidy and clean, safeguarding the information under their responsibility in the appropriate places for it.
- ✓ To avoid disseminating information regarding the Company on social networks or mass media that could cause any detriment to the prestige of PRODISA.
- ✓ To be trained on the performance of their functions in a constant and permanent manner.

Now, the **MEMBERS OF THE BOARD OF DIRECTOR**, in addition to the values, principles and rules of conduct already mentioned, in the exercise of their functions must act with:

- ⇒ Full knowledge
- ⇒ Good faith
- ⇒ Due diligence and Care

The **values, principles and rules of conduct** contained in this Code are mandatory for the subjects related to the Company, whatever their nature (directors, managers, officers, employees or advisors), with the **ETHICS COMMITTEE** being the body collegiate in charge of monitoring its application and due observance.

ETHICS COMMITTEE

Integration

It is a Collegiate Body of an advisory nature, which will be made up of three members of the Company appointed by its Board of Directors due to their impeccable reputation, professional experience and honorability.

CURRENT COMPOSITION



Faculties

- 1) Dissemination among employees and other subjects related to the Company of the values, principles and rules of conduct established in the Code, in the Anti-Bribery and Anticorruption Policy (ABC), as well as in the Policy to Prevent and Avoid Conflicts of Interest.
- 2) To resolve queries regarding the interpretation or scope of the values, principle and rules of conduct contained in this Code, as well as regarding the content and application of the ABC Policy and the Policy to Prevent and Avoid Conflicts of Interest.
- 3) To advise on the manner in which subjects related to the Company should act in cases not provided for in this Code, in the ABC Policy or in the Policy to Prevent and Avoid Conflicts of Interest.
- 4) To monitor compliance with the Code of Ethics and Conduct, the ABC Policy, as well as the Policy to Prevent and Avoid Conflicts of Interest.
- 5) To determine the existence or non-existence of a conflict of interest.
- 6) To determine the pertinence of the opening of an investigation with the elements provided by the informant when presenting their complaint and with which the Committee itself is gathered.

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- 7) To analyze and to resolve alleged breaches of any of the provisions contained in this Code, in the ABC Policy, in the Policy to Prevent and Avoid Conflicts of Interest, in the Policy in matters of Appointment of Officials and Integration of Files, as well as in the Policy for Contracting Services with Third Parties.
- 8) To apply the pertinent disciplinary actions to the transgressors of the Company's internal regulations, according to the seriousness of the non-compliance.
- 9) To give notice to the Legal Representative of the Company, in the event of the presumption of the commission of any crime, of the existence of a patrimonial or moral damage to the Company or of any infraction or administrative fault, so that the corresponding complaints, denunciations or demands are presented before the competent Authorities.
- 10) To carry out the annual review of the content of this Code and submit to the Audit Committee the updates that are necessary to adjust it to the changes that occur in the Company, in the market, in the society, in the legislation, the International Treaties or in the Jurisprudence. If updated, the modifications must be approved by the Board of Directors. Additionally, the recipients must be made aware of the changes made, as well as re-collect their signature under oath to tell the truth regarding their knowledge and commitment to comply.
- 11) To carry out the annual review of the Anti-Bribery and Anticorruption Policy (ABC) and submit to the Audit Committee the updates that are necessary to adjust it to the changes that occur in the Company, in the Legislation, the International Treaties or in the Jurisprudence. If it is updated, the modifications must be approved by the Board of Directors. Additionally, the recipients must be made aware of the changes made, as well as re-collect their signature under oath to tell the truth regarding their knowledge and commitment to comply.
- 12) To carry out the annual review of the Policy to Prevent and Avoid Conflicts of Interest and submit to the Audit Committee the updates that are necessary to adjust it to the changes that occur in the Company, in the Legislation, the International Treaties or in the Jurisprudence. If it is updated, the modifications must be approved by the Board of Directors. Additionally, the recipients must be made aware of the changes made, as well as re-collect their signature under oath to tell the truth regarding their knowledge and commitment to comply.
- 13) To project the Committee's Annual Work Program.
- 14) To render an Annual Report regarding the development and results obtained in the exercise of their functions to the Board of Directors and the Audit Committee of the Company.
- 15) Other tasks as assigned.

Functioning

- a) The Committee will meet quarterly.
- b) For the validity of the sessions, the attendance of the majority of its members will be required.
- c) The calls will be issued at least three business days in advance of the date on which the session will be held, except in urgent cases when it may be issued with one business day in advance. The calls must establish the day, time and place in which the session will be held, as well as contain the Agenda.
- d) Minutes of the sessions will be drawn up, which must include at least the place, date and time of the session, attendance list, deliberations, agreements and, if applicable, the results of the voting, as well as being autographed by each one of the members of the Committee who have participated in the

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meeting. The aforementioned minutes will be duly filed for inspection and surveillance purposes by the National Insurance and Surety Commission.

- e) The agreements or resolutions that are issued will be taken by majority vote of the members present, with the President having the casting vote in the event of a tie.
- f) The members of the Committee will act guaranteeing the confidentiality of the matters of which they have knowledge, as well as with full respect for the Human Rights of the alleged transgressors, recusing themselves from participating in those matters in which they have any direct interest (conflict of interest), in order to guarantee that the decisions are impartial and objective.
- g) The decisions of the Committee will be mandatory for the Company and for the related subject in question.
- h) The Committee will submit for the approval of the Board of Directors during the last quarter of the current year, its Annual Work Program for the following fiscal year, which must include at least the next points:
 - ⇒ Training on issues related to ethics, integrity and prevention of conflicts of interest.
 - ⇒ Annual review of the Code of Ethics and Conduct, the Anti-Bribery and Anticorruption Policy (ABC), as well as the Policy to Prevent and Avoid Conflicts of Interest.
 - ⇒ Measurements of the degree of compliance within the Company with the Code of Ethics and Conduct, the Anti-Bribery and Anticorruption Policy (ABC), as well as the Policy to Prevent and Avoid Conflicts of Interest.
 - ⇒ Attention to queries, as well as complaints or claims filed.
- i) The Committee shall submit an annual report to the Board of Directors and the Audit Committee regarding the development and results obtained in the exercise of their functions during the first month of the following fiscal year.

Procedures

I. Consulting

Any employee who has doubts about the application or scope of the Code, the ABC Policy or the Policy to Prevent and Avoid Conflicts of Interest should send their query via email to comitedeetica@protecciondinamica.com, so that the Committee instructs to whom it may concern so that the pertinent response is issued, under their supervision, within five business days following receipt of the request.

II. Complaints and Reports

In the event that any employee observes a situation that could be presumed to be a breach of any of the values, principles and rules of conduct established in this document, in the ABC Policy, or in the Policy to Prevent and Avoid Conflicts of Interest, they must communicate it in writing to the Ethics Committee, through the email address indicated in the previous section, attaching the evidence regarding the reported violation. Complaints or reports will be analyzed in the following quarterly session of the Committee, unless, for the nature of the alleged breach, it requires immediate attention, a situation in which it will be issued at the next business day the corresponding call setting a date to analyze and resolve the matter within 10 business days following the date of receipt of the complaint or report. The Committee will treat the name(s) of the complainant(s) with complete confidentiality.

III. Determination and application of disciplinary actions

In determining disciplinary actions carried out by the Committee, it must take into consideration:

- The evidence that exists on the commission of the alleged breach
- The background of the subject who committed the breach
- Hierarchical level of the subject who committed the breach
- Impact of non-compliance on the Company
- Risks related to non-compliance
- Severity of non-compliance
- Granting the presumed transgressors their guarantee of a hearing that is, allowing them to express what is convenient for them and to provide the evidence that they deem pertinent, prior written notification of the investigation initiated against them.

The Committee will meet and analyze the aforementioned factors as well as any other element of conviction that they gather to base their decision on the existence of non-compliance and on the disciplinary action to be applied, which must be taken by majority vote of the members present.

In the event that it is decided to apply any disciplinary action, the Committee will issue a document informing the transgressors the cause for which they are being sanctioned, as well as the applicable disciplinary action, with copies for their personnel file and for their immediate superior.

DISCIPLINARY ACTIONS FOR BREACHES OF THE CODE OF ETHICS AND CONDUCT

It is important to mention that actions contrary to the Code of Ethics and Conduct, as well as non-compliance with the Company's internal regulations, including the Anti-Bribery and Anticorruption Policy (ABC), and the Policy to Prevent and Avoid Conflicts of Interest, will constitute **breaches of a labor nature**, which may result in the application, at the discretion of the Committee, of any of the following **disciplinary actions**:

- Verbal admonition
- Written admonition
- Temporary suspension without pay
- Termination of the employment relationship

Serious breaches will be considered those related to the **Protection of Personal Data, Confidentiality, Conflicts of Interest** and violations to the **Anti-Bribery and Anticorruption Policy (ABC)**.

Likewise, those who violate external legal, regulatory and/or administrative provisions will be placed at the disposal of the competent Authorities for the legal effects that may arise.

ENTRY INTO FORCE

This Code will entry into force from the day after its publication on the Company's intranet and website.

APPROVAL BY THE BOARD OF DIRECTORS

This Policy as **unanimously** approved by the Board of Directors of Protección Dinámica, Agente de Seguros y de Fianzas, S.A. de C.V., on December 30, 2020 as recorded in the minutes of the meeting held for this purpose, which is kept in the files of the Company.

KNOWLEDGE OF THE CODE AND COMMITMENT TO COMPLIANCE

I declare, under oath to tell the truth, that I know and understand the content of this Code of Ethics and Conduct, as well as that I will comply with the provisions set forth therein, in my capacity as _____.

Mexico City, on _____ de 202__.

Full name

Employee number
(if any)

Signature

Last review and update: May, 2022.

This translation is a courtesy only. Should any controversy arise, only the terms of the Spanish version will be legally valid.