

CODE OF ETHICS AND CONDUCT

2022/2023



The Code of Ethics and Conduct represents the collective vision of Qualitas Group. The rules and conduct that inspire our daily activities and promote a culture of responsibility and integrity to provide an excellent service and to be an exemplary company”.

José Antonio Correa
Chairman of the Board and
Chief Executive Officer Grupo Qualitas



Letter from the Chairman of the Board

Those of us who are part of Qualitas Group share the same conviction that the success achieved is the result of the combination of the talent we have, our professional performance and the responsibility of our actions.

We are proud to be a business group that **respects human rights, is committed to society and the environment**, promotes equality and is capable of operating within the framework of legality with strict adherence to ethics.

It is in this spirit that the Code of Ethics and Conduct was developed and defines the rules of conduct and behavior that guide our actions and decisions, in addition to being an invitation to strengthen individual good judgment always based on the values on which our organization is founded.

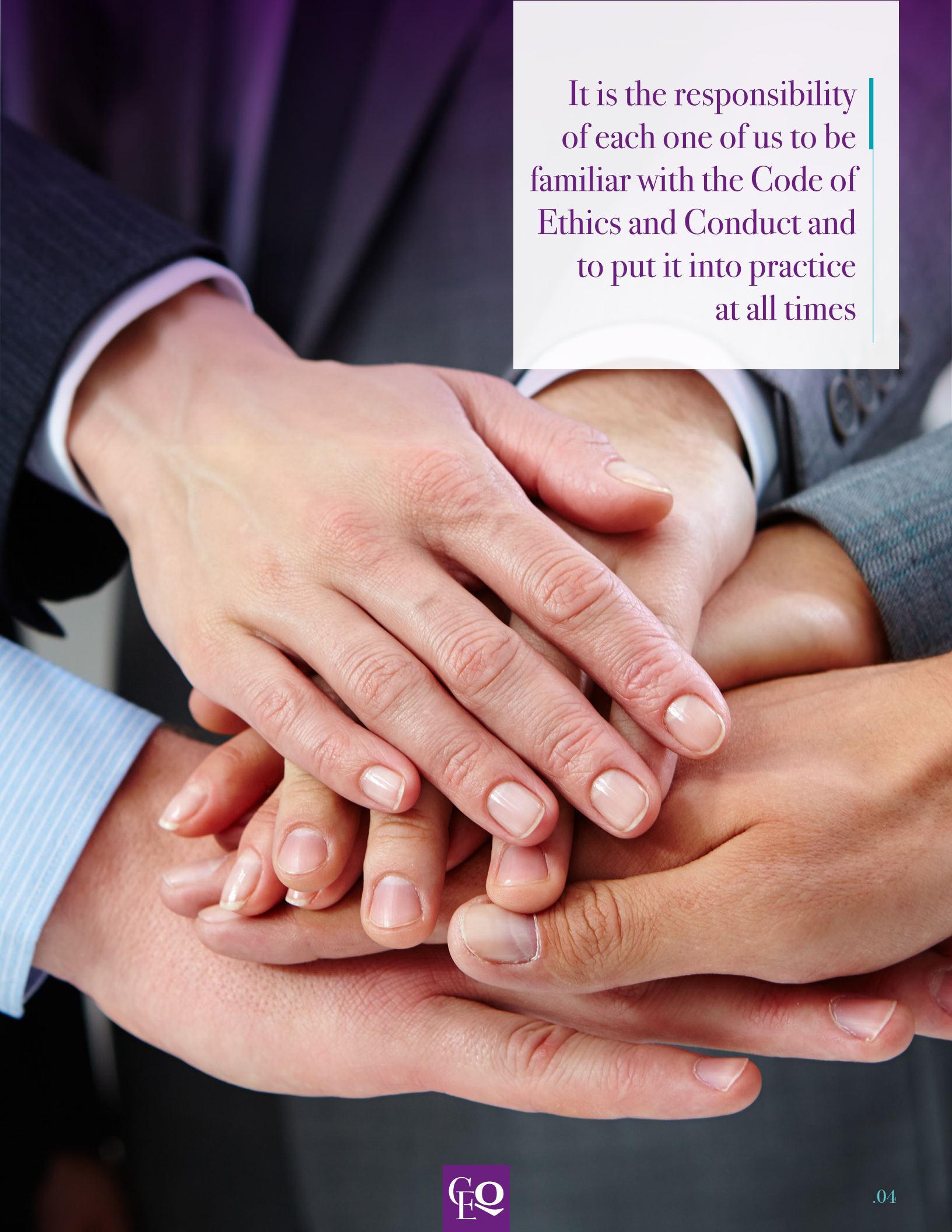
It is the responsibility of each one of us to know it and to put it into practice at all times, as well as to report any action that is contrary to it, and to ensure that our behavior is consistent with the ethical principles that have always distinguished us and are our strength in facing present and future challenges.

The genuine commitment of each one of us to follow and respect it will allow us to reaffirm the philosophy of our company and to endorse the trust of our customers, investors, business partners and society, which will strengthen the continuation and success of our Business Group.



José Antonio Correa

Chairman of the Board and
Chief Executive Officer Grupo Qualitas



It is the responsibility
of each one of us to be
familiar with the Code of
Ethics and Conduct and
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.01



OUR COMMITMENTS

Grupo Qualitas is successful thanks to the people who make it up, to the values that inspire us and to the goals we set out to achieve every day in order to fulfill our commitment to excellence in service.

Our **Mission, Vision and Values** are a reflection of our aspirations; we live, share and apply them in all our activities and in the services we provide, always exercising our activities with the highest professional and ethical standards.

Continuing with the positioning and consolidation of Grupo Qualitas requires exemplary behaviors to build productive and trustworthy relationships with all our stakeholders.

Our commitments and actions promote the creation of shared value and the sustained growth of the Business Group with full respect for human rights, the regulatory environment and care for the environment.



.02

OUR TEAM

Our employees are the heart of the company; their knowledge, skills and abilities allow us to build together the success of Grupo Qualitas.

Counting on the trust of our employees requires the best practices to offer them a safe and healthy work environment, **a work climate in which their fundamental rights are respected**; they are guaranteed equal treatment, free from any type of discrimination and harassment; and they can express themselves openly and be heard.

Our commitment to our customers entails having the best talent to provide the best service. For this reason, we promote the professional and personal development of each of our employees with training, growth opportunities and fair compensation based on their position, responsibility and results obtained.

.03 QUALITAZING: A WAY OF BEING

At the Group, **Qualitazing** means acting consistently with our values, making a commitment to excellence in service and relating responsibly and respectfully with each of our stakeholders. It is much more than a statement of intent, it is an individual and collective reality that each of our employees makes their own: it is a way of being.

In order to act accordingly, those of us who are part of Grupo Qualitas are part of and align ourselves with a set of rules and expected behaviors defined in this document.

Be an example of integrity...

- Always act in an ethical way, with high technical and professional standards.
- Act with integrity and consistency between what is said and what is done.
- Always respect the laws and external and internal regulations in all activities, operations and negotiations.

What you do and how you do it matters...

- Assess, recognize and take responsibility for your actions.
- Act within the limits of competence and permitted authorization levels, with integrity, diligence and good judgment in decision making.
- Apply continuous improvement as a must in your competencies, personal and professional skills.
- Seek learning and self-development in order to perform in a dynamic environment.
- Comply with the technical and professional standards that each position entails and align with the quality standards of the company to meet the expectations of our customers.
- Practice and promote an open door work environment in which the doubts and concerns are expressed with full confidence and freedom.

Respect as a definition of who we are...

- Carry out our activities with full **respect for human rights and the environment**.
- **Avoid any practice of discrimination, intimidation or harassment**, as well as reject and denounce it.
- Know and **respect the culture and traditions of the country** in which we operate in order to generate a value proposition in the service we offer to our customers.



.04 OUR CORPORATE RESPONSIBILITY

The Group's success lies in the **ability to gain and maintain the preference of our customers and partners**. To earn their trust, it is paramount to protect their interests and the company's reputation by always acting with transparency and honesty.



Legality and compliance

- Respect and act in accordance with applicable laws and regulations related to our business in the countries in which we operate.
- Ensure that all our activities are carried out within the legal framework.
- Maintain open, transparent, and cooperative relations with regulatory bodies and respond to any request from the relevant authorities.
- Communicate to the group any involvement in legal proceedings that could impact its functions and the company's reputation.

Anticorruption



- **Reject** any participation in **activities considered unlawful, fraudulent, corrupt**, or susceptible of being perceived as such by law.
- **Not participate in bribes**, offer benefits to third parties, or accept external benefits in the performance of our duties.
- **Refrain from giving or receiving gifts from customers**, suppliers or third parties, whether in the form of money, objects, entertainment, loans or any other benefit or special treatment.
- **Refrain from giving any gift or providing any attention or service that could be understood as an act of corruption** or aimed at obtaining preferential treatment incompatible with the laws and this Code of Ethics and Conduct.



Financial security

- Put **profitability, productivity, efficiency, effectiveness, efficacy, and the fulfillment of our goals** before any other interest in our activities and decision making.
- **Avoid any conflict of interest** with individuals or companies; in the event of any, declare it in accordance with the established policy.
- In any activity, it is considered a **conflict of interest** if any member of the company, in the performance of his or her duties, acts or takes actions for his or her personal benefit, for the benefit of his or her spouse and relatives by blood in the ascending or descending straight line up to the fourth degree, or for the benefit of a third party, to the possible detriment of the Group's productivity and assets.
- Preserve and make **appropriate use of the goods and assets** available and/or under management, as well as take care of the company's material and financial resources.
- Undertake the **commitment to generate sufficient and reliable financial and operating information**, to have evidence and to communicate it clearly.
- Always seek the efficiency of **work processes** and systems used in daily work.

Place
profitability,
productivity,
effectiveness,
efficiency and the
fulfillment of our
goals before any
other interest in
our activities and
decision making.



Confidentiality

- Maintain **total confidentiality in the handling of our clients' and partners' information**, as well as the appropriate use of information obtained from the services we provide, which will only be disclosed when requested by the relevant authority, in compliance with the **Ley Federal de Protección de Datos Personales** and our privacy notice.
- Making public **Qualitas' confidential information** to which we have access is an unfair practice and a violation of the Ley de Propiedad Industrial.



Total satisfaction of each of
our customers

.05 OUR CUSTOMERS

Our primary commitment as Grupo Qualitas is the total satisfaction of each of our customers in order to maintain a long-term relationship with them. The way to achieve this is based on the specialization of our business and excellence in service.

- Attend our clients with a true vocation and attitude of service.
- Provide a service of excellence that exceeds their expectations through a respectful, cordial, timely, accessible, and personalized attention at reasonable costs.
- To provide honest advice with reliable, correct, and understandable information.
- Show openness and empathy to know and understand the specific needs of each client and satisfy them.
- Differentiate our services from the rest of the market.
- Specialize in our branches of business to anticipate their needs.
- Exercise with transparency, operational excellence and compliance with the agreed in the services provided.
- Seek at all times to gain and maintain your trust.
- Provide innovative technological solutions.



.06

OUR SERVICE PROVIDERS AND BUSINESS PARTNERS

The companies and people who provide us with their products and services strengthen our operational efficiency and are an essential part of our quest for total customer satisfaction. Establishing **productive and trusting relationships** with each of them is a fundamental link in the construction of our value chain.

- Create win-win relationships, always respecting the established agreements and commitments.
- Establish supplier selection processes based on equality, transparency, and equity.
- Promote free competition avoiding biases or preferences for certain service providers.
- Prioritize commercial exchange with service providers that share our vision, ethics, and values.



.07 OUR RELATIONSHIP WITH SOCIETY AND THE ENVIRONMENT

As a service Business Group, we seek to have a positive impact on society through our products and actions that contribute to improving the environment in which we operate.

- Respect human rights.
- Operate in a socially responsible manner in the countries and communities where we have a presence.
- Protect and respect the environment.
- Contribute to the social and economic development of our neighboring areas.
- Promote a culture of sustainability.
- Act fairly, promote inclusion, and reject any discriminatory practices.



.08 COMPLIANCE WITH THE CODE

- The principles and criteria contained in this Code of Conduct are **mandatory** for all employees of Grupo Qualitas.
- All members of the Group are responsible for **knowing, practicing, and monitoring** compliance with the Code of Ethics and Conduct, as well as the policies, procedures, authorization matrices, risk and control matrices, and applicable regulations.
- If there are any doubts about the scope of our ethical or legal responsibilities regarding the Code of Ethics and Conduct, please consult the Labor Relations or Internal Control areas.
- It is mandatory to **report any violation or suspected violation of the Code of Ethics and Conduct**, internal and external regulations through the **Q-Transparencia** portal, which is a means of electronic communication where you can report complaints and non-conformities involving employees, suppliers, insured or any affected person. The report is anonymous and confidential.



.09 ETHICS COMMITTEE

The Ethics Committee is appointed by the Board of Directors.

1. Revision and update

- It is the responsibility of the Board of Directors to authorize and/or ratify the Code of Ethics and Conduct, as well as its annual updates.
- The Internal Audit area will include in its reviews the compliance with this Code in the different companies of Grupo Qualitas.

2. Training and dissemination media

- The Code of Ethics and Conduct will be made known through the publication in the internal portal of each company that is part of the Business Group, a knowledge course and acceptance through **Universidad Qualitas**, in the public site and the Agents' Portal.
- For service providers, this will be made known through the "Operating Rules that govern our business practice", which will be signed at the time of contracting the service provision.

3. Reporting Channels

- All members of Grupo Qualitas must report any suspicion or violation of the Code of Ethics and Conduct, internal and external regulations through the Q-Transparencia portal or the means established by each of the companies that are part of the Group.
- Web form: **www.resguarda.com/qualitas**
- Línea telefónica: **800-123-3312**
- E-mail: **q-transparencia@resguarda.com**
- The complaint is anonymous and always taking care of the complainant. No retaliation will be allowed.

4. Consequences of noncompliance

- Failure to comply with the rules and behaviors of the Code of Ethics and Conduct may result in corrective action against whoever is responsible.
- Any employee who breaches the Code of Ethics and Conduct or who carries out business practices in terms different from those established in the Code may be subject to different administrative and/or legal liabilities.



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Quálitas®