



Quálitas

Responsible Investment Policy

1. Purpose

To integrate Environmental, Social, and Governance (ESG) criteria into the investment process and assess the alignment of Quálitas Compañía de Seguros' investment strategy with Mexico's Sustainable Taxonomy.

2. Mexico's Sustainable Taxonomy and ESG Criteria

Quálitas Compañía de Seguros, as an institutional investor and with the goal of maximizing long-term returns, aligns its investments with selected elements of Mexico's Sustainable Taxonomy and ESG criteria, which are reflected in its processes and risk management framework.

3. Responsible Investment Policies

Quálitas Compañía de Seguros, through its team members and decision-making bodies, will strive to:

- a. Provide training to all individuals involved in the investment process, regarding literature and best practices related to the incorporation of ESG criteria into investment analysis and decision-making.
- b. Incorporate ESG criteria in internal processes and policies.
- c. Be an active investor and incorporate ESG criteria into ownership practices and policies.
- d. Promote exemplary environmental and social practices, uphold strong corporate governance, and ensure transparency among the issuers in which investments are made.
- e. Promote our Responsible Investment Policy internally, among the entities in which we invest, and within the insurance industry.
- f. Foster the efficient integration of ESG principles in the insurance industry.
- g. Report on policy compliance, progress in the incorporation of ESG criteria, and the alignment of the investment strategy with Mexico's Sustainable Taxonomy.

4. Scope of the Responsible Investment Policy

Quálitas Compañía de Seguros' investment area shall consider the following ESG-related factors when analyzing investment opportunities:

ENVIRONMENTAL:

- Resource use efficiency;
- Mitigation and adaptation to climate change;
- Circular economy practices;
- Greenhouse gas emissions;
- Resource depletion; and
- Biodiversity.

SOCIAL:

- Respect for human rights;
- Labor conditions;
- Relation with communities;
- Occupational health and safety;
- Diversity and inclusion; and
- Antitrust practices.

CORPORATE GOVERNANCE:

- Compliance of accounting standards;
- Audit Records;
- Financial and operative transparency;
- Diversity, experience and structure of the Board of Directors;
- Rights of the investors;
- Prevention of Conflict of interests; and
- Prevention of illegal activities, including acts of terrorism, violence, corruption, and/or money laundering.

To ensure the robustness of the information used to evaluate these factors, QUALITAS will only use reliable sources that are aligned with methodologies backed or developed by international frameworks and/or standards of transparency and reporting.

This policy applies to all debt and equity securities listed in public markets, as well as to FIBRAS of any kind and to Structured Instruments; all of them as defined in QUALITAS' Investment Manual authorized by the Investment Committee.

Additionally, we have defined a series of sectors and activities excluded from QUALITAS' investment policy and, therefore, from the ESG evaluation. These excluded investments are those that do not align with our values and/or have a particular social and/or environmental impact. As part of our investment analysis, we try to identify investments that may have a negative impact on this sustainable approach.

List of sectors and activities that are excluded from investment:

- a. Gambling, casinos and/or similar activities.
- b. Manufacturing and/or sale of firearms.
- c. Production and/or sale of tobacco, alcoholic beverages and/or illegal drugs.
- d. Pornography.

5. Implementation of the Responsible Investment Policy

ROLES AND RESPONSIBILITIES

- **BOARD OF DIRECTORS.** The Board is responsible for authorizing the investment guidelines to strengthen the integration of ESG criteria in to the analysis and decision-making process, as well as for the assessment of the alignment between QUALITAS' investment strategy and the Mexican Sustainable Taxonomy.
- **INVESTMENT COMMITTEE.** For investment decisions and related matters, the members of the investment committee shall exercise their vote based on ESG considerations and analysis. Furthermore, they shall monitor the reports and assessments prepared by either QUALITAS' Investment Area or a third party regarding the incorporation of ESG criteria to the investment strategy and its alignment with the Mexican Sustainable Taxonomy.
- **INVESTMENT AREA OF QUÁLITAS COMPAÑÍA DE SEGUROS.** Comply with the highest standards in investment decision-making, operating in a transparent and efficient manner.

In matters of responsible investment, ESG-related factors must be considered when designing investment proposals to be submitted to the Investment Committee and when analyzing investment opportunities. In addition, reports should be generated to enable the competent bodies to monitor the implementation of the responsible investment policy and the alignment of the investment strategy with the Mexican Sustainable Taxonomy.

For the public securities in which QUALITAS invests, the Investment Area shall exercise the corporate rights with an ESG-minded voting through the individuals designated to represent the company.

Promote the adoption of the necessary mechanisms to strengthen the integration of responsible investment policies into the investment process.

5.2 Implementation of the Responsible Investment Policy

The Investment Area shall conduct an analysis to support the planning and definition of the tools to incorporate ESG criteria within the investment process. This implementation shall be carried out on a continuous and ongoing basis. Below is a detailed description of the activities and initiatives to be developed.

INITIATIVE	DESCRIPTION	ALIGNMENT WITH THE RESPONSIBLE INVESTMENT POLICY
Responsible Investment Methodology Based on ESG Criteria	The Investment Area shall implement a responsible investment methodology that incorporates ESG criteria into the investment process. This methodology shall be supported using a due diligence questionnaire and ESG analysis of each initial public offering, including FIBRAs, credit instruments, and structured products. The questionnaire should be designed and applied by the Investment Area. The Investment Area shall also monitor the ESG ratings assigned to the securities in which QUALITAS invests.	Incorporation, transparency and promotion
ESG-minded corporate voting.	This proposal is applicable to both the Investment Committee and the Investment Area in the exercise of QUALITAS' corporate rights in the securities in which the company invests. Accordingly, designated Committee members and appointed representatives in these corporate actions are required to cast their votes considering: 1) the economic value and viability of the investments; and 2) the principles of responsible investment, when applicable.	Incorporation, involvement and promotion
Measurements and report on ESG performance	The Investment Area shall produce reports that provide a clear understanding of the implementation of the responsible investment principles and the ESG performance of the portfolio.	Transparency and Report
Methodology to Measure Alignment of the Responsible Investment Policy with the Mexican Sustainable Taxonomy	The Investment Area shall have a methodology to measure the alignment of the investment strategy with the Mexican Sustainable Taxonomy. Activities, assets, and established criteria must be identified and defined once the Sustainable Taxonomy provides specific evaluation criteria.	Incorporation and Transparency

6. Review and control of the Responsible Investment Policy

The Investment Area shall attend information requests; submit the relevant reports to the appropriate bodies; and promote the dissemination of ESG investment results.

7. Definitions

1. Sustainable Mexican Taxonomy: A classification system that enables the identification and definition of activities, assets, or investment projects with positive environmental and social impacts, based on established goals and criteria.
2. Institutional Investor: Institutions with significantly more resources to invest than the general public. Examples: banks, investment companies and insurance companies, among others.
3. FIBRAs: Mexican Real Estate Investment Trusts. Financial vehicles designed to fund the acquisition and/or construction of real estate properties intended for leasing, or to acquire the right to receive income generated from the leasing of such properties.
4. Structured Instruments: Securities typically documented through stock certificates, with or without an obligation to pay principal or interest. They are issued by trusts, financial entities, or any other company authorized under applicable laws. Their returns, and where applicable, principal payments, are linked to the performance of one or more underlying assets, regardless of the nature of the certificates or documents on which they are evidenced.

1. https://www.gob.mx/cms/uploads/attachment/file/809773/Taxonomia_Sostenible_de_Mexico.pdf
2. https://www.banxico.org.mx/elib/mercado-valores-gub/OEBPS/Text/iii.html#_ftn5
3. https://www.bmv.com.mx/docs-pub/MI_EMPRESA_EN_BOLSA/CTEN_MINGE/Fibras.pdf
4. <https://www.cnbv.gob.mx/SECTORES-SUPERVISADOS/BURS%C3%81TIL/Descripci%C3%B3n/Paginas/Instrumentos.aspx>