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1. PURPOSE

The main purpose of these Policies centers on:

- 1) Ensuring transparency in the interactions and relationship development of Quálitas executives and personnel with insurance agents and brokers, suppliers, shareholders, regulatory and oversight bodies, or others.
- 2) Identifying all situations that could potentially generate Conflicts of Interest for Quálitas.
- 3) Specifying the procedures to follow and measures to adopt for the prevention, management, or disclosure of Conflicts of Interest.

2. SCOPE

To all personnel (workers, fee-based/contract personnel, Officers, or Board Members) assigned to Quálitas Compañía de Seguros, S.A. de C.V. (hereinafter, Quálitas) or any of its subsidiaries, Office Directors, and service office personnel.

3. CONCEPTS

Shareholder	A person or group of people who hold a stake in the capital stock of the company and/or an institution.
Worker/Employee	Personnel who render their services to Quálitas, which may include: workers, fee-based/contract personnel, interns, or social service personnel.
Conflict of Interest	Any situation in which it may be perceived that a personal or private benefit and interest could influence the professional judgment or decision of an entity member regarding the compliance of their duties.
Clients	Insured parties or affected Third Parties derived from an automobile claim.
Related Party Transactions	Those carried out between Quálitas and another Entity, or internally between a supervisor and a subordinate, with which an equity, family, and/or professional tie exists.
Financial Interest	Ownership stake in the capital stock of a company or institution. Being a partner and/or shareholder of Quálitas as well as of another company (competitor or supplier) with which Quálitas conducts an operation. It can also be understood as any relationship entered into by a Quálitas worker with a partner and/or shareholder of another company with which Quálitas conducts an operation.

Family Ties	Kinship (whether direct or collateral line, ascending or descending) or individuals related by blood, affinity, or civil law up to the fourth degree with someone from the Entity with which an operation is conducted. Up to the fourth degree refers to the relationship held with: parents, children, grandchildren, grandparents, great-grandparents, great-grandchildren, siblings, parents-in-law, son-in-law, daughter-in-law, siblings-in-law, aunts/uncles-in-law, nieces/nephews-in-law, children's parents-in-law (<i>consuegros</i>), spouses of siblings-in-law (<i>concuños</i>), spouse, or domestic partner.
Professional Relationship	Being a board member, worker, power of attorney holder, executive, or professional contracted for advisory or professional services with the Entity or person with whom Quálitas conducts an operation.

4. POLICY

4.1. GENERAL POLICIES

The Officer or worker/employee:

- 4.1.1. Must not allow their personal interests to conflict with their obligations to Clients and Quálitas.
- 4.1.2. Must refrain from providing private services to Clients when these services are or can be presumed to be aimed at generating business relationships with Quálitas.
- 4.1.3. Must avoid behaviors and situations that generate conflicts between the interests of the Insurance Company and its Clients, Agents, Brokers, Suppliers, Regulatory or Oversight Bodies. Therefore, they must not allow decisions corresponding to their work to be influenced by relationships with their family members, friends, or related individuals.
- 4.1.4. A conflict of interest exists when Officers or personnel carry out any of the following transactions, or when, having knowledge of them, they fail to report them to the Personnel Administration Management:
 - I. Own shares in any Quálitas company, competing company, client, or supplier, except in cases where they are acquired through the stock market.
 - II. Maintain financial interests in transactions carried out with Quálitas companies and subsidiaries directly or indirectly (for example: through a family member). Such interest must be approved by the General Directorate before the transaction takes place.
 - III. Serve as a board member, secretary, director, or officer in any company outside of Quálitas without the express authorization of the General Directorate.
 - IV. Grant loans to their officers using resources from Quálitas companies and subsidiaries without adhering to the established authorization policies.
 - V. Hire or influence the hiring of personnel who are family members of personnel, clients, suppliers, or

members of the Board of Directors without the respective authorization. (See Family Hiring Policy).

VI. Rehire personnel who previously worked at any of the Quálitas companies and subsidiaries, as well as contract goods or services from former personnel, without authorization from the General Directorate (see Personnel Recruitment and Selection Policy and Procedure).

VII. Execute administrative procedures or any other service for "insured parties" or affected parties with whom there is a Family Tie or emotional bond.

4.1.5. Each Officer or worker/employee will be responsible for declaring during the year the existence of any potential conflict(s) of interest regarding themselves or their relatives (whether in a direct or collateral line, ascending or descending, up to the fourth degree, or persons with whom they have a relationship by affinity or civil law, hereinafter referred to as family members), at any time a conflict of interest might arise, even if it happens after the annual declaration. For this purpose, Quálitas will provide the "Conflict of Interest Declaration" form, which will be available on the Universidad Quálitas webpage.

4.1.6. Based on the declared information, Quálitas, through the Personnel Administration Management, will determine whether or not the situation constitutes a conflict of interest; if it is deemed as such, it will inform the Officer or worker/employee so that necessary preventive measures can be jointly determined.

4.1.7. Any personnel who do not complete their "Conflict of Interest Declaration," or who omit or provide false information, will be considered in serious breach of these policies and, therefore, corresponding administrative sanctions may apply, which could lead to contract termination if the severity warrants it.

4.1.8. Any worker/employee who discovers situations involving a conflict of interest, or situations that could potentially represent one, must bring it to the attention of the Personnel Administration Management, either in writing, verbally, or through the communication channels established for this purpose.

4.2. SPECIFIC POLICIES

4.2.1. Every Officer or worker/employee linked: equity-wise, personally, or professionally to Quálitas, and who participates in the interaction with:

- Suppliers (Hiring, selection, recommendation, compliance evaluation, payments, among others);
- Insurance Agents and Brokers (Quotes, business contracting, commission payments, among others);
- Insured Parties (Policy issuance, renewals, claims payments, among others);
- Regulatory or Oversight Bodies (Audits, etc.); or
- Who participates in any of Quálitas' processes.

4.2.2. Must observe the following ethical aspects:

Personnel are prohibited from:

- 4.2.2.1. Receiving money, loans, discounts, bonuses, or favors that establish commitments that could influence their decisions, compromise their workplace or professional behavior, or seek to obtain a potential concession from Quálitas or personal advantage.
- 4.2.2.2. Under no circumstances accepting valuable gifts, advantageous conditions, salaries, trips, meetings or entertainment shows, commissions, or any other form of compensation from clients, suppliers, financial institutions, concessionaires, contractors, companies, or individuals with whom operations are conducted. (See Policy on Receiving Gifts from Suppliers).
- 4.2.2.3. Offering money or any financial benefit directly or indirectly through others for the illicit obtaining of a business, concession, or operation for Quálitas.
- 4.2.2.4. Making use of information regarding operations and transactions carried out by Quálitas, whether this is business information, contracts, reports, or confidential documents, which imply the risk of harming the company.
- 4.2.2.5. Taking for themselves or channeling to the competition any business opportunity in which Quálitas might be interested.
- 4.2.3. Personnel who violate the policy described above will be subject to the termination of their contract with no liability whatsoever for Quálitas.
 - a) Participating in businesses or performing additional activities that are incompatible with their duties or that may cause a conflict of interest or detriment to their work.
 - b) Hiring, without authorization from the General Directorate, services of any nature from:
 - Personnel who previously rendered services to Quálitas or Foreign and Local Offices.
 - A person who has a family relationship with any worker/employee or personnel who previously rendered services to Quálitas, or any other person who represents a Conflict of Interest with Quálitas.
- 4.2.4. If the worker/employee, Office Director, Office Director's personnel, or Board Member has a shareholding stake in any supplier, agent, insured party, or regulatory entity, they must adhere to the following:
 - a) Notify the Personnel Administration Management and the Auto Valuation Sub-directorate / Agreements Management in writing of the shareholding stake and the organizational structure of the supplier company.
 - b) Report the current role performed within Quálitas, indicating their upward and downward reporting line, to ensure that the worker/employee, Board Member, or Office Director cannot be involved in the information exchange process or in the purchase or sale process of the good or service related to the company in which they participate.
- 4.2.5. All personnel must observe the following:

4.2.5.1. In the event that 2 (two) workers/employees decide to establish a conjugal relationship, a domestic partnership, or any other relationship that could be considered a potential conflict of interest, they must notify the Personnel Administration Management to jointly determine:

- a) If they belong to the same area as a subordinate, the People Directorate will suggest who must relocate within a maximum period of 30 calendar days; otherwise, the worker/employee's termination will proceed.
- b) If they are in different areas, the best alternative for Quálitas will be defined, which may include determining the separation from the Institution of one of the two.

4.2.6. If at any time a worker/employee receives a proposal from a superior to work with a supplier in a way that implies deviating from any established policy or procedure, they must report it immediately to the Personnel Administration Management, indicating at least the following:

- a) Name of the person forcing them;
- b) Date the instruction was received;
- c) Specific explanation of the facts through which they establish that they were instructed to deviate from the policy; and
- d) Name of the supplier.

4.2.7. If at any time a worker/employee receives a proposal from a supplier, agent, client, or regulatory body to receive financial compensation or compensation in kind in exchange for influencing their preference for the provision of services, they must notify the Personnel Administration Management immediately in writing, indicating at least the following:

- a) Name of the person making the proposal;
- b) Date on which it was made; and
- c) A description of the facts.

4.2.8. No worker/employee may omit compliance with this policy, whether by order of an Officer or due to any other type of Conflict of Interest. If this is the case, they must report said situation to the Personnel Administration Management, indicating at least the following:

- a) Name of the person forcing them;
- b) Date the instruction was received;
- c) Specific explanation of the facts through which they establish that they were instructed to deviate from the policy; and
- d) Name of the supplier or Officer, among other points deemed important.

4.3. REGARDING THE COLLECTION OF THE CONFLICT OF INTEREST DECLARATION.

- 4.3.1. During the hiring of new personnel, the "Conflict of Interest Declaration" must be signed; however, it is mandatory to update it again as part of the corresponding mandatory courses for compliance month, once these are enabled on the Universidad Quálitas platform, upon completion of their 3-month probationary period.
- 4.3.2. In the month of June of each year, personnel will be requested to complete the compliance month courses, and the "Conflict of Interest Declaration" is included within this regulatory compendium (*"Declaración de conflicto de interés"*).
- 4.3.3. It is the responsibility of each Officer and/or worker/employee to fill out the "Conflict of Interest Declaration." To do so, they must log in with their username and password on the Universidad Quálitas platform. The Training Management will be responsible for safeguarding it digitally on said platform for consultation at any time.
- 4.3.4. It is the responsibility of each area that hires a supplier to request them to fill out the "Conflict of Interest Declaration for Suppliers and Service Providers" in physical form for integration into their file, and in digital and/or handwritten form as indicated below (*"Declaración de Conflicto de Interés Proveedores y Prestadores de Servicio"*):
- a) Auto Valuation Sub-directorate / Agreements Management for claims suppliers or service providers.
 - b) Grúas Q Sub-directorate for towing and roadside assistance suppliers or service providers.
 - c) Information Security Director for IT Systems suppliers or service providers (only in cases of maintenance, annual support, licensing, and consulting).
 - d) Administrative Management for administrative suppliers or service providers.
 - e) Labor Legal Management for suppliers or service providers, regarding the registry of specialized service providers or specialized works (REPSE)
 - f) Training Management for suppliers or service providers of the People area.
 - g) Bajío, North, and South Office Relations Sub-directorate for office relations suppliers or service providers.
- 4.3.5. In the event that the supplier is hired by another area, that area will be responsible for what is indicated in section 4.2.8.

4.4. REGARDING THE REGISTER OF CONFLICTS OF INTEREST.

- 4.4.1. It will be the responsibility of the Personnel Administration Management to validate whether a conflict of interest exists when an Officer and/or worker/employee reports it during the annual completion of the form in compliance month; however, a second form will be available on the Universidad Quálitas platform, which must be used by the officer or worker/employee to immediately declare any conflict that arises at any time of the year, following the steps detailed in the corresponding procedure in **Annex 1**.

- 4.4.2. It will be the responsibility of the areas indicated in point 4.3.4 that collect the "Conflict of Interest Declaration for Suppliers and Service Providers" (*"Declaración de Conflicto de Interés Proveedores y Prestadores de Servicio"*) form to validate whether or not a Conflict of Interest exists; if any case is reported, they must notify the Directorate to which they are assigned via email.
- 4.4.3. It will be the responsibility of the areas indicated in point 4.3.4 that collect the "Conflict of Interest Declaration for Suppliers and Service Providers" form to validate whether or not a Conflict of Interest exists; if any case is reported, they must notify the Directorate to which they are assigned via email (*"Declaración de Conflicto de Interés Proveedores y Prestadores de Servicio"*).
- 4.4.4. The Personnel Administration Management will classify the type of notice received and inform the People Directorate to determine the area to which it should be channeled, with the purpose of determining whether or not a Conflict of Interest exists.
- 4.4.5. The People Directorate must report annually to the General Directorate all cases that have been determined to have a high risk of conflict of interest.
- 4.4.6. The areas indicated in point 4.3.4 will inform the Directorate to which they are attached, which will be the only entity authorized to approve or decline establishing or continuing the service provision relationship if it is identified that elements lacking consistency and transparency exist.

4.5. REGARDING THE MAINTENANCE AND UPDATE OF THE CONFLICT OF INTEREST REGISTER.

- 4.5.1. Information regarding reported or potential conflict of interest cases will be managed by the Personnel Administration Management, or by the Auto Valuation Sub-directorate / Agreements Management, Grúas Q Sub-directorate, Information Security Director, Administrative Management, Labor Legal Management, Training Management, and Bajío, North, and South Office Relations Sub-directorate, which will monitor compliance with this policy and follow up on reported cases at least on an annual basis.
- 4.5.2. It is the responsibility of the Personnel Administration Management to carry out the annual update campaign for the personnel's "Declaración de Conflicto de Interés" (Conflict of Interest Declaration) and it is the responsibility of the Auto Valuation Sub-directorate / Agreements Management, Grúas Q Sub-directorate, Information Security Director, Administrative Management, Labor Legal Management, Training Management, and Bajío, North, and South Office Relations Sub-directorate to carry out the update campaign for the *"Declaración de Conflicto de Interés Proveedores y Prestadores de Servicio"* (Conflict of Interest Declaration for Suppliers and Service Providers), in collaboration with the responsible areas.
- 4.5.3. In the case of suppliers or service providers, an update of the *"Declaración de Conflicto de Interés Proveedores y Prestadores de Servicio"* (Conflict of Interest Declaration for Suppliers and Service Providers) form will only be requested when a change in their status is reported—that is, if initially no conflict was reported but one currently exists, or if a conflict of interest had previously been reported.

5. INVOLVED POLICIES

- Family Hiring Policy.
- Personnel Hiring Policy for Foreign and Local Offices.
- Policy on Receiving Gifts from Suppliers.
- Personnel Recruitment and Hiring Policy and Procedure.

6. SANCTIONS

Any violation of the rules contained in this document will result, depending on the severity of the case, in the imposition of the sanctions provided for in the Internal Labor Regulations and, if necessary, those established by applicable laws.

Suppliers, as well as the personnel of all entities that offer a specialized service to Quálitas who fail to comply, will be sanctioned with contract termination, and, in the event of financial damage, Quálitas reserves the right to take any legal actions it deems appropriate.

In strict compliance with the applicable regulatory framework, the Company recognizes the strategic importance of integrating Environmental, Social, and Governance (ESG) criteria into its control processes and decision-making.

Consequently, this document incorporates these criteria into corporate operations, aligning with current regulations, organizational maturity levels, and insurance sector best practices. This initiative promotes a culture of responsibility and transparency in synergy with our continuous improvement principle.