



Code of Ethics and Conduct 2026



Insuring cars,
caring about people.

“The Code of Ethics and Conduct represents the collective vision of Grupo Quálitas. The rules and behaviors that inspire our daily activities and promote a culture of responsibility and integrity, enabling us to provide excellent service and be an exemplary company.”

José Antonio Correa

Chairman of the Board
of Grupo Quálitas





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Letter from the Chairman of the Board

At **Grupo Quálitas**, we all share the same conviction that the success we have achieved is the result of the combination of our talent, our professional performance, and the responsibility behind our actions.

We are proud to be a Business Group that **respects human rights, is committed to society and the environment**, promotes equality, and operates within the framework of the law with strict adherence to ethics.

It is under this spirit that the Code of Ethics and Conduct was developed. It defines the rules of conduct and behaviors that guide our actions and decisions, while also encouraging us to strengthen our individual judgment, always grounded in the values upon which our organization is built.

It is the responsibility of each one of us to know and apply it at all times, as well as to report any action that contradicts it, ensuring that our behavior remains consistent with the ethical principles that have always distinguished us and that represent our strength in facing present and future challenges.

The genuine commitment of each of us to follow and respect this Code will allow us to reaffirm our company's philosophy and reinforce the trust of our clients, investors, business partners, and society as a whole, thereby strengthening the continuity and success of our Business Group.





It is the responsibility
of each of us to know
the Code of Ethics and
Conduct and to put it
into practice at all times.

.01

Our Commitments

Our Mission

To protect the assets and physical integrity of insured motor vehicle owners, as well as their liability to third parties, through quality service that complies with the agreed insurance contract and fully satisfies our clients' expectations.

Our Vision

To maintain our leadership in the auto insurance market, fully fulfilling our mission.

To remain at the forefront of innovation and technology in all aspects of our operation.

To be able to fully meet our sustainability commitments and strict adherence to ethics with all our stakeholders: policyholders, employees, agents, investors, suppliers, and the community.

To continue our internationalization process, leveraging our methodology, synergy, and competitive advantages.

To collaborate in promoting an insurance culture in our country and in addressing the growing complexity of road safety and mobility, as part of our social responsibility.



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

At Grupo Quálitas, we work to be leaders in the insurance sector, guided by solid principles and a clear vision for the future. Our Mission, Vision, and Values reflect our aspirations, we live them, share them, and apply them in all our activities and in the services we provide, always carrying out our activities under the highest professional and ethical standards.

Continuing the positioning and consolidation of Grupo Quálitas requires exemplary behavior to build productive and trusting relationships with all our stakeholders.

Our commitments and actions foster the creation of shared value and the sustained growth of the Business Group, fully respecting human rights, the regulatory environment, and our values. Furthermore, we promote environmental stewardship, the well-being of our employees, professionalism with suppliers, as well as gender equality and equity.



.02 Our Values

At Quálitas, we live our values consistently; they are the foundation that sustains our identity and guides the behavior of everyone who makes up the company. These principles guide our decisions, actions, and the way we relate to clients, employees, suppliers, and business partners.

For Quálitas, transparency and ethics are the driving force behind our culture. Together with our values, they constitute strategic tools to prevent risks, strengthen the organization, and ensure that every employee acts with integrity. **We embrace our values as a permanent commitment.**

1. Equity

Systematically recognize the efforts, achievements, and loyalty of the company's members.



5. Honesty

Honesty implies expressing oneself sincerely and behaving consistently with the truth, integrity, and all other values established in the Quálitas culture.



2. Solidarity

Quálitas accepts its responsibility to all groups of people within the company, establishing commitments with each of them and fully fulfilling them.



6. Responsibility

Fulfilling commitments on time and in the proper manner.



3. Loyalty and Personal Dedication

This should be the result of the daily practice and experience of the values listed above, fostering dedication, commitment, and a sense of belonging among employees.



7. Transparency

Providing the truthful and timely information required for efficient relationships with each stakeholder group.



4. Cordiality

We believe that in a company dedicated to providing service, it is essential to have an attitude of kindness, courtesy, and cheerfulness in the daily interactions of all its members.



8. Respect for the Dignity of Persons

Recognizing, accepting, and valuing the individual rights and qualities of the people who make up the company, considering them valuable in themselves and worthy of full respect. All forms of discrimination based on gender, ethnicity, origin, religion, age, social class, physical appearance, sexual orientation, marital status, or similar factors will be rejected.





.03 Our Team

Our employees are the heart of the company. Their knowledge, skills, and abilities allow us to build Grupo Quálitas' success together.

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

Our commitment to our teams means having the best talent to provide the best service. Therefore, we promote the professional and personal development of each of our employees with training, growth opportunities, and fair compensation based on their position, responsibilities, and results achieved. We work as a team to foster collective growth, focusing on raising awareness and creating the best work environment for everyone, complying with regulations, and establishing reliable communication channels.



.04 Qualitazing: a way of being

At the Group, Qualitazing means acting in accordance with our values, committing to excellence in service, and relating responsibly and respectfully to 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 adopts as their own: it is a way of being, where we seek congruence between what we say and what we do.

To act accordingly, those of us who make up Grupo Quálitas are part of and align ourselves with a set of rules and expected behaviors defined in this document.

Be an example of integrity...

- Perform at all times with an ethical attitude, with high technical and professional standards.
- Act with integrity and congruence between what is said and 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...

- Evaluate, acknowledge, and take responsibility for your actions.
- Act within the limits of competence and authorized levels, adhering to integrity, diligence, and sound judgment in decision-making.
- Apply continuous improvement as a fundamental principle in your competencies, personal and professional skills.
- Seek learning and self-development to perform in a dynamic environment.
- Comply with the technical and professional standards that each position entails and align with the company's quality standards to meet our clients' expectations.
- Practice and promote an open-door work environment where doubts and concerns are expressed with complete confidence and freedom.

Respect as the definition of who we are...

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





.05

Our Corporate Responsibility

The Group's success is founded on the trust and preference of its customers and partners. To earn and maintain that trust, all actions and decisions must be guided by transparency, honesty, and integrity, while safeguarding their interests and protecting the Company's reputation.

Legality and Compliance



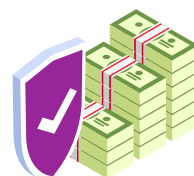
- Respect and act in accordance with current legislation and regulations related to our business in the countries in which we operate.
- Ensure that all our activities are carried out within the framework of the Law.
- Maintain open, transparent, and cooperative relationships with regulatory bodies and respond to any requests from the competent authorities.
- Inform the Group of any involvement in legal proceedings that could impact their functions and the company's reputation.

Anti-Corruption



- Reject any participation in activities that the law considers illegal, fraudulent, corrupt, or likely to be perceived as such.
- Do not participate in bribery, offer benefits to third parties, or accept external benefits in the performance of their duties.
- Do not give or receive gifts from clients, suppliers, or third parties, whether in money, goods, entertainment, loans, or any other benefit or special treatment, in accordance with the established policy.
- Refrain from giving any gift or providing any attention or service that could be understood as an act of corruption aimed at obtaining preferential treatment incompatible with the laws and the Code of Ethics and Conduct.





Financial Security

- Prioritize profitability, productivity, effectiveness, efficiency, and the achievement of our goals above any other interest in our activities and decision-making.
- In any activity, it is considered a conflict of interest if any member of the company, in the performance of their duties, acts or takes action for personal gain, the benefit of their spouse and relatives by blood in the direct ascending or descending line up to the fourth degree, or of a third party, to the possible detriment of the Group's productivity and assets.
- Avoid all conflicts of interest with individuals or legal entities; if any arise, declare them in accordance with the established policy.
- Maintain strict restrictions on business relationships with government entities and political parties to avoid any act or conduct that may be related to bribery, corruption, or conflicts of interest.
- Preserve and make appropriate use of the assets and property at our disposal and/or under our administration, as well as safeguard the company's material and financial resources.
- Commit to generating sufficient and reliable financial and operational information, maintaining supporting evidence, and communicating it clearly.
- Always seek efficiency in work processes and systems used in daily work.
- Operate with transparency and maintain the trust of our clients, suppliers, and shareholders.



Confidentiality

- Maintain complete confidentiality in the processing of personal data of our clients and partners, and use it exclusively within the framework of the services we provide. This information will only be disclosed when there is an express request from a competent authority, in accordance with the Federal Law on the Protection of Personal Data Held by Private Parties and our Privacy Notice.
- Making public Quálitas' confidential information to which one has access is an unfair practice and violates the Industrial Property Law.

Prioritize profitability, productivity, effectiveness, efficiency, and the achievement of our objectives above any other interest in all activities and decision-making processes.





.06

Diversity, Inclusion, and Gender Equity

At Grupo Quálitas, we foster and value diversity, prioritizing equal rights and opportunities for all people. We promote a space of respect where no type of discrimination based on disability, gender, sexual identity or orientation, or any act of exclusion or inequality by any of us who make up the Group is accepted.

- We are committed to gender equity and diversity, ensuring equal opportunities, fair compensation, and an inclusive work environment, creating informative spaces with training, talks, and awareness campaigns for all members of the Group.
- We value diversity in gender, age, and thought, placing talent in various leadership positions within the company.
- We seek to consolidate a safe, inclusive, and equitable work environment where each person is valued and respected, promoting collaboration, transparency, and a genuine commitment to collective well-being.
- We prioritize respect for human rights and work continuously to implement improvements that allow us to be a benchmark of integrity, ethics, and responsibility.





.07

Our Clients

“Total
satisfaction
of each of our
clients”

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

- To serve our clients with a true vocation and attitude of service.
- To provide excellent service that exceeds their expectations through respectful, cordial, timely, accessible treatment and personalized attention at reasonable costs.
- To provide honest advice with reliable, accurate, and understandable information.
- To show openness and empathy to know and understand the specific needs of each client and satisfy them.
- To differentiate our services from the rest of the market.
- To specialize in our lines of business to anticipate their needs
- To operate with transparency, operational excellence, and compliance with what was agreed upon in the services provided.
- To always seek to earn and maintain their trust.
- To provide innovative technological solutions.



.08 Service Providers and Business Partners



The companies and individuals who provide us with their products and services strengthen operational efficiency and are an essential part of our customers' total satisfaction. Establishing productive and trusting relationships with each of them is a fundamental link in building our value chain.

At Grupo Quálitas, transparency and integrity are fundamental principles that guide all the activities we carry out with our Service Providers and Business Partners. Therefore, each business relationship is rigorously reviewed and approved in accordance with our contracting policies and procedures, guaranteeing compliance with regulations and avoiding conflicts of interest, unfair practices, or anti-competitive conduct.

We also encourage all our partners to know and adopt the Code of Ethics and Conduct, the institutional values, and the commitment to legality. This allows us to establish clear expectations about the responsible behavior we expect from them and from us, ensuring business relationships based on integrity, professionalism, and strict regulatory compliance. In this regard, we focus on:

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- Create win-win relationships, always respecting established agreements and commitments.
 - Establish supplier selection processes based on equality, transparency, and fairness.
 - Promote free competition, avoiding bias or preference for certain service providers.
 - Know, understand, and comply with the Code of Ethics and Conduct, ensuring it is accepted, understood, and signed by suppliers before formalizing any business relationship.
 - Share business objectives and an interest in Social Responsibility and the environment, as well as respect for labor rights and transparency in operations.
 - Emphasize and raise awareness about the importance of Quálitas' reputation and its business relationships.
 - Seek high standards of quality, consistency, reliability, and trustworthy processes in its services.





.09 Our Relationship with Society

As a service-oriented business group, we seek to have a positive impact on society through our products, service excellence, and actions that contribute to improving the environment in which we operate. We assume our ethical commitment to society and the responsibility to contribute to the common good, respecting human rights. We promote a culture of prevention in insurance and financial education, prioritizing safety training and road safety education.

- We generate a positive impact in communities by creating decent jobs and offering fair and safe working conditions.
- We support local economic development, fostering sustainable growth and helping to improve the quality of life and prosperity of the communities in which we operate.
- We operate in a socially responsible manner in the countries and communities where we have a presence.
- Contribute to the social and economic development of our environment.





.10

Our responsibility to the environment

We understand and take responsibility for the positive changes we can implement to benefit the environment, protect the future, and improve people's quality of life. We are committed to taking actions that contribute to improving the environment in which we operate.

These actions include reforestation initiatives, incorporating hybrid and electric vehicles into our fleets, implementing digital tuning, using solar panels, sustainability courses, and responsible and efficient consumption of fuel, electricity, and water.

Our operations include monitoring and inventorying greenhouse gas emissions. We support civil society organizations specializing in environmental issues.

Our main guidelines are:

- Protect and respect the environment.
- Promote a culture of sustainability.
- Implement measures to reduce environmental impact.
- Encourage the efficient use of resources.





.11 Use of Social Networks and Digital Media

We invite our employees and suppliers to participate in social networks and digital media responsibly, with common sense and respect”

At Grupo Quálitas, we understand the importance of using social networks responsibly. Therefore, we invite our employees and suppliers to participate in social networks and digital media responsibly, with common sense, respect, and professionalism, protecting our reputation and considering the following:

- Avoid disclosing confidential information.
- Refrain from making comments that could harm the image of Quálitas, its employees, and suppliers.
- Posts related to Quálitas must be positive and reflect the company's values.
- Quálitas corporate social networks must be managed and used exclusively by authorized departments. It is prohibited to speak on behalf of Quálitas, use its image, or use corporate accounts to handle personal matters or make comments on social networks without authorization.



.12 Compliance with the Code of Ethics

- The principles and criteria for action contained in this Code of Ethics and Conduct are mandatory for all employees of Grupo Quálitas.
- 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.
- In case of doubts about the scope of our ethical or legal responsibilities related to the Code of Ethics and Conduct, it is recommended that you contact the Integrity, Internal Control, and Labor Relations areas.
- It is mandatory to report any violation or suspected non-compliance with the Code of Ethics and Conduct, internal and external regulations through the Q-Transparency portal, which is an electronic communication channel where complaints and grievances involving employees, suppliers, policyholders, or any person involved in any irregularity related to Quálitas can be reported.
- The report is anonymous, confidential, and without any retaliation.
- Employees or suppliers must support the investigation process when necessary.
- This Code of Ethics and Conduct should be considered a primary basis; any breach may result in disciplinary action or sanctions, which may even include termination of employment or business relationship.





.13

Ethics Committee

The Ethics Committee is appointed by the Board of Directors.

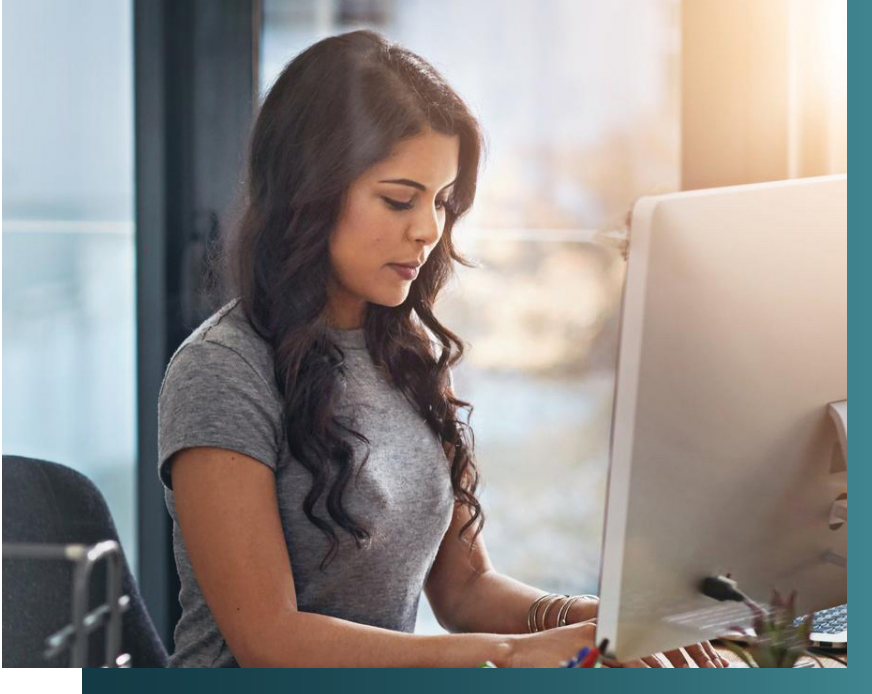
1. Review and Update

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

2. Training and Dissemination

- The Code of Ethics and Conduct will be disseminated through publication on the internal portal of each company that is part of the Business Group, training courses, and acceptance through Universidad Quálitas, on the public website and the Agent Portal.
- For service providers, it will be disseminated through the “Operating Standards that Govern Our Business Practice,” which will be signed at the time of contracting the service.
- It is the Supplier’s responsibility to ensure that all its employees and service providers act in accordance with the established guidelines.





3. Reporting Channels

- All members of Grupo Quálitas must report any suspicion or violation of the Code of Ethics and Conduct, internal and external regulations through the Q-Transparency portal or the means established by each of the companies that are part of the Group.
 - ▶ Web Form: www.resguarda.com/qualitas
 - ▶ Telephone line: 800-123-3312
 - ▶ Email: q-transparencia@resguarda.com
- Reports are anonymous and confidential, always protecting the whistleblower. No type of retaliation will be permitted.

4. Consequences of Non-compliance

- Failure to comply with the rules and behaviors established in the Code of Ethics and Conduct may result in corrective action against the responsible party. This could even lead to the imposition of the sanctions provided for in Federal Labor Law.
- Any employee or business partner who violates the Code of Ethics and Conduct or who engages in business practices different from those established herein may be subject to various administrative and/or legal liabilities.





Quálitas®