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1. OBJECTIVE

The objective of this Policy is to reaffirm Quálitas' commitment regarding full respect of human rights, setting out principles to ensure and guaranty the freedom, integrity and dignity of all individuals.

2. SCOPE

This policy is applicable to all collaborators ascribed to the different subsidiaries of Quálitas Controladora S.A.B. de C.V., regardless of their activity or geographical location, including the relation between them and the rest of the interested parties.

3. TERMS

Discrimination

Any and all distinction, exclusion, limitation or preference that, due to act or omission, intentionally or not, is not objective, rational or proportional and has the purpose or result of obstructing, limiting, preventing, neglecting or voiding acknowledgment, use or exercise of the human rights and freedom, when based on one or more of the following reasons: ethnic origin or nationality, skin color, sex, gender, age, disabilities, social, economic, health o legal status, religion, physical appearance, genetic features, immigration status, pregnancy, opinions, sexual preferences, political identity or affiliation, civil status, family situation, language, criminal records or any other reason; discrimination also includes homophobia, misogyny, any xenophobia expression, racial segregation, antisemitism, as well as racial discrimination or other related intolerance forms.

Diversity

Makes reference to the difference, variety and abundance of different things or to dissimilarity. Diversity dissents distinction of classes, nationality, religion, sex, disability,

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pregnancy, sexual orientation and/or political affiliation.

Favorable Organizational Environment

An environment that promotes a sense of belonging from the collaborators towards the company, training for the proper performance of the tasks entrusted, the precise definition of responsibilities for workers in the workplace, proactive participation and communication between collaborators, the adequate distribution of workloads with regular working hours in accordance with the Federal Labor Law and performance evaluation and recognition.

Harassment To stalk, hound, bother, disturb.

Intimidation To instill fear towards a person or group of persons.

Freedom of Association

The right to unite or form part of social groups under a common objective.

Freedom of Speech The right to express opinions.

Freedom of Assembly The right to peacefully congregate with a purpose.

Labor Mobbing / Harassment

The International Labor Organization (ILO), defines mobbing as the verbal or psychological action of a systematic, repeated or persistent nature through which, at work or in connection with work, a person or a group or persons hurts a victim, humiliates, offends or intimates a person. In this document, mobbing and harassment are used indistinctly.

Forced Labor

Pursuant to the Forced Labor Convention, force labor means all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily

Child Labor

Pursuant to the ILO, child labor means any work which is likely to harm the health, safety or morals of children. Specifically, has the following characteristics:

- is dangerous and harms the child's physical, mental and moral wellbeing;
- interferes with the child's education since:
 - it prevents them from attending classes;
 - forces them to abandon school at an early age, or
 - requires them to combine education with hard labor which consumes much time.

Violence

The World Health Organization defines violence as the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm or deprivation.

Labor Violence

Harassment and mobbing acts or bad treatment against any person in the company. (Leader-collaborator, collaborator-leader, collaborator-collaborator) that can harm

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integrity or health.

4. GENERALPOLICIES

This Policy seeks to make human rights prevail in the operations of Quálitas Controladora, in accordance with the company values, which include Equity, Responsibility and Respect towards the dignity of individuals, in addition to being aligned with the Code of Ethics and Conduct. This Policy is developed based on the Universal Declaration of Human Rights and the United Nations Guiding Principles on Businesses and Human Rights.

Quálitas' collaborators shall comply with the no discrimination guidelines regarding personnel of the company's interested parties.

4.1. COLLABORATORS

- 4.1.1. Quálitas Controladora and its companies are committed to providing a work environment that guarantees the individual's integrity and free exercise of rights.
- 4.1.2. Quálitas Controladora and its companies, respect freedom of speech, association and assembly of all personnel and under no circumstance shall collaborators experience acts of injustice due to their opinion or association with groups, including unions or trade union committees.
- 4.1.3. Pursuant to the Diversity and Respect Policy, any form of discrimination is strictly prohibited. All collaborators shall be valued by their talent within the diversity.
- 4.1.4. The company provides tools to promote equal opportunities in career selection, acknowledgment and development. It fosters a transparency culture, recognizing the effort and collaboration of its members.
- 4.1.5. At Quálitas Controladora the collaborator's total compensation is crafted in accordance with the position's profile, responsibilities, competences and performance evaluation, without any difference due to gender or any other diversity characteristic of the individual. In addition, to ensure ongoing wage-related competition, there is an annual wage-related survey with the purpose of monitoring competitiveness of the collaborator's total compensation.
- 4.1.6. The Company is committed to provide fair and proper working conditions to all collaborators, including necessary work tools and equipment availability for adequate performance of their functions.

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- 4.1.7. The Company seeks providing conditions to its personnel that foster wellbeing and contribute to self-care through education and formation of its well-being program addressing 5 dimensions of the individual: physical, intellectual, family, spiritual and professional.
- 4.1.8. Quálitas meets the legal labor framework in force in the jurisdictions it performs operations, prohibiting any practice contrary to the legislation and standards, therefore such legislation and standards are included within its internal policies and guidelines.
- 4.1.9. Pursuant to the Respect and Diversity Policy, all collaborators shall treat each other with respect and kindness, disrespectful conducts (aggravating or humiliating) are prohibited.
- 4.1.10. Quálitas Controladora, through diverse practices and organizational documents (code of ethics, policies and procedures, communication campaigns, complaints line, organizational environment survey, performance evaluation system, etc.) oversees performance of an environment free from labor violence or any other act that humiliates or threatens the individual's human rights.
- 4.1.11. Quálitas is committed to providing a favorable organizational environment between collaborators and leaders of the company through prevention of psychosocial risk factors, established in NOM-035-STPS-2018.
- 4.1.12. The Company has established protocols to assist collaborators that have suffered severe trauma in connection with work, set forth in the "psychosocial risk factors" policy.
- 4.1.13. Quálitas Controladora places the "adjust your emotions" program at the collaborators and their families disposal for purposes of receiving psychological support all year round 24 hours a day, by calling 800.800.9010 or through in-person consults, if required. Likewise, it provides guidance regarding financial, legal, food, leadership, governance and integral management matters.

4.2. AGENTS, OFFICE MANAGERS AND POLICYHOLDERS

- 4.2.1. The services provided by Quálitas are governed under the no discrimination principle.
- 4.2.2. Quálitas, at all times, addresses agents and policyholders with honesty, to build trust and respect between the company and the client.
- 4.2.3. Quálitas is committed to a solid operation management, including risks' prevention, in response to the trust provided by the agents and the policyholders.
- 4.2.4. As part of its trust commitment with the policyholders and observance of the legislation, the Company guarantees protection and proper use of the personal information provided by its clients, as well as information derived from operations.

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- 4.2.5. Quálitas is committed to access to insurance and development of a prevention culture, placing different assistance mechanisms at the policyholders' disposal, that include a vast agent network, services office and Quálitas Development Offices (ODQs).
- 4.2.6. Quálitas fosters the inclusive development of the society, which goes far beyond the policyholders. Likewise, it is committed to a responsible road safety conduct and healthy coexistence on the roads.

4.3. PROVIDERS

- 4.3.1. Quálitas provides a fair and equitable treatment to its providers under the mutual development principle and observance of the conditions set forth in the different agreements and contracts.
- 4.3.2. Quálitas oversees that the providers' performance complies with the regulations and observes this policy. This is practiced since the selection of provider stage, in order to extend the human rights commitment and compliance of its obligations to all persons that form part of the supply chain.
- 4.3.3. In addition, Quálitas seeks comprehensive respect towards humans, including no discrimination, throughout the whole experience of the policyholder. Therefore, providers dealing with the policyholder shall guaranty respect of integrity and diversity.

4.4. COMPANY

- 4.4.1. Road safety, through responsible use, are key in the integrity of individuals. Quálitas promotes adoption thereof by the Company, through its operation as part of its social responsibility. The Company encourages that its collaborators and members of the value chain, including agents, office managers and providers, perform their duties as promoters of a safe and respectful road conduct.
- 4.4.2. Quálitas considers road safety as the pillar of civic coexistence, regarding everybody sharing roads. The Company expands its commitment towards respect practices far beyond its policyholders and rest of the drivers, implementing a comprehensive approach that includes adults, young adults and kids.
- 4.4.3. Human rights commitment forms part of the principles with which Quálitas addresses social investment, seeking to work on determined problems of the communities in which it is present. For purposes of establishing solid bases, respect of diversity and the educational component comes first in both the selection of organizations as well as in the matters to be addressed.
- 4.4.4. Quálitas performs alliances with civil society organizations that promote social development in the health, education and environment fields.
- 4.4.5. The relation of Quálitas with the society, including its different stakeholders, always observes and practices transparency.

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4.5. IMPLEMENTATION MECHANISMS

Caring and fostering respect of human rights in the operations, forms part of the Company's different control, surveillance and audit mechanisms for development of personnel. It is also included in the evaluation of the relation with providers, agents and other business allies.

All collaborators are required to observe and comply with this policy, the Code of Ethics and Conduct and further policies and guidelines. Any noncompliance shall be informed to the Company. In the event of any noncompliance, collaborators or any other interested party, have access to a Complaint Line in order to anonymously perform a report.

- Web Form: www.resguarda.com/qualitas

- Phone line: 01-800-123-3312

- Email: q-transparencia@resguarda.com

5. SANCTIONS

Infringement of the provisions included herein shall result in, depending of the severity of the breach, sanctions provided for in the Internal Work Regulations and, if necessary, the sanctions established in the applicable laws.

6. AUTHORIZATIONS

| Version | Government Body | Meeting |
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| 1 | Board of Directors | April 21, 2020. |

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