



Interseguro

SANCTIONS POLICY

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1. INTRODUCTION

Seeking proper communication and transparency in order to identify improper actions and behaviors and their corresponding consequences, Interseguro's Compliance Area has implemented a sanctions policy which establishes various types of disciplinary measures applied to the failure to comply with the Anti-corruption Compliance Program and its associated policies, which are detailed in the following documents:

- a) Corporate Compliance Policies.
- b) Corporate Anti-Corruption Policies and Guidelines.
- c) Code of Ethics.

All the aforementioned documents are available on the intranet.

2. OBJECTIVE

The objective of this Policy is to establish and clarify the consequences and sanctions for failure to comply with the Anti-Corruption Compliance Program and all its associated policies mentioned in the Corporate Compliance Policy. Disciplinary measures are educational rather than punitive in nature; thus, the main objective of disciplinary measures is to prevent violations.

3. SCOPE

This document applies to all directors, managers, employees, temporary or contract personnel (collectively called "employees") as well as to all Third Parties acting for and on behalf of Interseguro. Likewise, Interseguro expects its shareholders, investors or other large stakeholders, when acting on behalf of, in representation of, or for the benefit of Interseguro, to comply with this Policy.

4. DEFINITIONS

4.1. Employees

People linked to any of the Interseguro areas, including the members of the Board of Directors.

4.2. Willful blindness:

For the purposes of this document, this occurs when an Employee or Third Party of Interseguro intentionally avoids seeing, listening to or reporting inappropriate behaviors or failures to comply with the Policies mentioned in this document.

4.3 Third Parties

The term "Third Parties" refers to any natural or legal person, whether national or foreign, public or private, with whom Interseguro has established an agreement of any kind to:

- i. Provide Interseguro with a product or service.
- ii. Rent, lease, assign or utilize real or personal property.
- iii. Establish a consortium, conduct a joint business or joint operations.
- iv. Provide service as a correspondent agent.
- v. Interact with public or private officials on behalf of Interseguro.
- vi. Act for or on behalf of Interseguro for any other purpose.

Any other circumstance not indicated in the preceding paragraphs in which there are doubts about the qualification as a "Third-Party" must be evaluated by the PLAFT [Prevention of Money Laundering and Financing of Terrorism] Compliance Officer, who will determine if this policy is applicable to the case.

5. RELATED POLICIES

The Anti-Corruption Compliance Program is detailed in the following documents:

- d) Corporate Compliance Policies.
- e) Corporate Anti-Corruption Policies and Guidelines.
- f) Code of Ethics.

All the aforementioned documents are available on the intranet.

6. VIOLATIONS AND SANCTIONS

6.1 TYPES OF SANCTIONS

There are three types of sanctions, depending on the offense committed:

- A ADMINISTRATIVE SANCTION:** From the application of a verbal or written warning up to the termination of employees or the termination of Third-Party contracts. The warning must be signed by the VP of Management and Human Development and the resolution of the contract must be coordinated with the Legal Department.
- B ECONOMIC SANCTION:** The possibility of employees not receiving variable income (for example: performance bonuses, sales bonuses, among others) or the application of sanctions to Third Parties in accordance with the terms of the applicable contract that governs Interseguro's relationship with said supplier, contractor or external employee. The PLAFT Compliance Officer will be responsible for handling the process with the support of the Coordinating Office for Compensation and Labor Matters in the case of employees. With regard to Third-Party sanctions, these shall be handled with the support of the Legal Department.

- C LEGAL SANCTIONS:** The possibility of taking civil and criminal actions, if necessary. The PLAFT Compliance Officer will handle these with the support of the Legal Department.

6.2 SANTIIONS FOR FAILURE TO COMPLY

If there is a failure to comply with the policies related to the Anti-Corruption Compliance Program, the employee will be sanctioned according to the offense committed:

VIOLATION	TYPE OF SANCTION	CORRESPONDING POLICY
1. Failure to comply with the Code of Ethics and Standards of Conduct on the part of managers, employees and/or third parties.	A/B/C	Code of Ethics
2. Misleading and/or hindering investigations into potential breaches of the Anti-Corruption Compliance Program.	A/B	Corporate Compliance Policy and Corporate Anti-Corruption Policies and Guidelines
3. Incurring in willful blindness and not reporting through the appropriate channels.	A	
4. Failing to comply with Policies pertaining to the Anti-Corruption Compliance Program.	A/B/C	
5. Unexcused absence to mandatory Compliance Program training.	A/B	
6. Taking any type of retaliation against those who provide information regarding acts that violate the Anti-Corruption Compliance Program.	A/B	
7. Failure to comply with applicable laws in Policies pertaining to the Anti-Corruption Compliance Program.	A/B/C	

7. POLICY COMPLIANCE

In the event of a conflict between the provisions of this policy and applicable law, the applicable law shall prevail.

8. DOCUMENT REVIEW

This Policy must be approved by General Management. Likewise, the PLAFT Compliance Officer must review this document annually and, if applicable, carry out the corresponding update.

The update will follow the line of approval described above.

TABLE OF CHANGES

Item	Page	Description
-	-	Document created