

ANTICORRUPTION POLICY		
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ANTICORRUPTION POLICY

INSURCOL, is committed to fighting bribery, extortion, fraud and corruption within its administrative, operational and financial processes that arise from its daily operations, for which it establishes:

- **Eradication of Corrupt Practices such as Bribery / Extortion:** Through the Code of Good Governance, Code of Conduct, Audits and fiscal audits that ensure the transparency of all income and expenses, also ensuring that resources are applied efficiently.
- **Criteria for issuing and receiving gifts and hospitality:** No worker is authorized to give gifts on behalf of Insurcol., In case it is considered necessary due to commercial events, it will be duly controlled under the procedure Request for resources for CSR activities.

Any improper payment or against the principles and ethics of the company, made or received by workers or representatives of INSURCOL or any natural or legal person, made in order to obtain some degree of influence in the initiation or conservation of a business relationship in which INSURCOL intervenes, will be totally rejected and sanctioned based on the provisions of our internal work regulations.

All workers have the responsibility of keeping records on any transaction or business that involves disposing or transferring assets owned by INSURCOL.

- **Ways to detect and limit conflicts of interest:** likewise, situations that may present conflicts of person's interests and those of the company should be avoided; In the event that a situation arises, we must inform our immediate boss in order to provide an appropriate solution.
- **Mechanisms for consultation against doubtful actions:** To comply with the foregoing, there is a management committee in charge of promoting, monitoring and guaranteeing the application of this policy and of informing Management or its delegate of any anomaly presented in the compliance with it.



OMAIRA CARDENAS RODRIGUEZ
General Manager

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