



<NOMBRE DEL DOCUMENTO>		
ANTICORRUPTION POLICY		
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ANTICORRUPTION POLICY

INSURCOL LTDA, is committed to combating bribery, extortion, fraud and corruption within its administrative, operational and financial processes that arise from daily operations and thus establishes:

- Elimination of corrupt practices as Bribery / Extortion: Through the Corporate Governance Code, Conduct Code, Audit and tax revisorías ensure transparency of all income and expenses also ensuring that resources are applied efficiently.
- Criteria for Issuing and receiving of gifts and attentions: No employee is authorized to make gifts on behalf of Insurcol Ltda, in cases where it is deemed necessary by business events will be properly controlled under the Resource Ordering procedure for activities of RSE.

Any illegal payments or against the principles and ethics of the company, made or received by employees or representatives of INSURCOL LTDA or any natural or juridical person, made in order to obtain some degree of influence in the initiation or maintenance of a business relationship that involved INSURCOL LTDA will be totally rejected and punished based on the provisions of our internal regulations.

All employees have the responsibility to maintain records of any transaction or business involving dispose of or transfer assets owned INSURCOL LTDA

- Gateways to detect and limit conflicts of interest: likewise, avoid situations that might present a conflict of personal interests and those of the company; in the event that a situation arises, we must inform our immediate boss to give an appropriate solution.
- Transparency versus relations with political parties: In the same way, we made it clear that INSURCOL LTDA does not own any distinction or political preference, for which we let our workers freedom of their own choice; thus prohibiting conducting electioneering within our company.
- Consultation mechanisms against dubious: To comply with the above, it has a management committee to promote, monitor and ensure the implementation of this policy and report to management or delegate any anomalies presented in compliance thereof.

ALVARO GONZALEZ RODRIGUEZ
Gerente General