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| | Policy Name: PSM COM-007 Code of Conduct and Ethics | |
| Line of Business: Medicaid and Commercial: | | |
| Effective Date: 11/01/2018 | | Last Review Date: 07/15/2022 |
| Reviewed by: Astrid Figueroa García (Compliance Senior Director), William Ruiz Alejandro (Corporate Chief Compliance Officer) | | Approved by: Nanette Dumont López (Executive Vice-President) |

I. Purpose

Since its founding in 1979, the Mennonite Health Plan (PSM) has developed an honorable reputation and exceptional organizational culture through the hard work and integrity of its workforce members. We have achieved significant growth and success by maintaining this reputation and acting in accordance with the highest values and principles. We will continue to be successful if we all work to understand, apply, and abide by the values contained in this Code of Ethics and Conduct.

The Code of Ethics and Conduct is a guide that seeks to shape, illustrate, and defend the values that each PSM employee and contractor is expected to uphold. The purpose of this Code is to establish guidance for you to apply the correct principles and values when representing PSM and its subsidiaries both internally and before external entities. Every decision and action you take can affect employee morale, the perception of our company, and the sustainable results we achieve. Conducting ourselves ethically is the best practice for the group of employees, contractors, and business associates to help us be more efficient and work as one team to achieve our goals.

Each of us represents the company's excellent reputation, therefore, PSM expects and holds the members of its workforce responsible for always choosing the correct and ethical position and path. The success of our business depends on a reputation of integrity and high ethical standards in everything we do. All employees, contractors and business associates must read, understand, and adhere to the Code of Ethics and Conduct contained in this guide.

II. Scope

This Code applies to all directors, corporate officers, members of the workforce (full-time, part-time, temporary, trainees, volunteers, and students), agents and subcontractors or delegated entities of PSM always, anywhere in the world. Each one of us should read the Code of Ethics and Conduct, as well as the Compliance Program, along with any other policies, manuals or manuals that apply to our respective jobs. Participating agents, consultants, healthcare providers and subcontractors or delegated entities are not employees of PSM, but their compliance with this Code is important



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because integrity, ethical behavior and respect for each individual must permeate every activity in which we are involved.

Violations of this Code are subject to civil or legal disciplinary/corrective action, including, but not limited to, termination of employment or contract. In some cases, civil and criminal penalties may apply. Due to the significant legal and ethical consequences of non-compliance with this Code, disciplinary action may be taken not only with respect to those who violate the Code, but also those who, due to lack of diligence or supervision, fail to prevent or report violations.

This Code describes expectations for behavior and ethical standards for how we should conduct business. It is PSM's policy to discourage and prevent the occurrence of unethical or illegal behavior. Once the unethical conduct has been identified, PSM will apply disciplinary measures and/or sanction its directors, corporate officers, members of the workforce who violate the principles and standards contained in this Code; including the persons responsible for covering up said action, lack of detection of a violation or willful failure to report a violation. The healthcare industry is a significantly regulated one. As part of our ethical duty, we must know the regulations that govern our business, including Federal and State laws and regulations that apply to us.

III. Policy

Integrity and Professionalism

We are all responsible for knowing, understanding, and complying with this Code, as well as all PSM policies and procedures. The standards established in the Code must be used in conjunction with PSM's policies and procedures, including the Corporate Policies Manual, the General Standards of Conduct Manual, the Compliance Program and other departmental or administrative procedures. While there may be some overlap, the Code does not replace or substitute any part of the General Standards of Conduct Manual that is not addressed in the Code. The Compliance Program, as well as the previously mentioned manuals, are available in their entirety to all members of the workforce through the employee portal.

Any questions regarding specific employment-related policies can be directed to your manager, the Compliance Officer or Human Resources staff. PSM expects its independent contractors to act ethically, comply with applicable laws, and adhere to the applicable principles and standards set forth in this Code. Each subcontractor or delegated entity is encouraged to adopt and comply with a particular code of conduct for its organization, which reflects the commitment to detect, prevent and



correct non-compliance, fraud, waste and abuse in the administration and delivery of its products and services, as well as keeping confidential information secure. Independent consultants and contractors may request a copy of any applicable corporate policy from their contact in the plan. PSM has an open-door policy, so any employee, contractor, business associate or delegated entity can turn to the Compliance Officer for guidance and communicate any conduct in contravention of this Code of Ethics and Conduct.

Ethical Culture

The Codes of Ethics and Conduct contain general guidelines and do not address every potential situation or problem that we may face. It is important to understand the general principles that govern the Code and how to apply them. We must act honestly and ethically to safeguard the integrity of PSM. Employees, contractors, business associates, and representatives of delegated entities must never engage in dishonest or illegal acts, even if requested to do so by a director, corporate officer, supervisor, another employee, or an independent contractor. You should immediately report any request that encourages you to engage in a dishonest or illegal act to your supervisor, your Compliance Officer, or the Ethics and Compliance Helpline. Compliance with our Code, the Compliance Program and other policies is subject to audit. If you are unsure about a course of conduct, ask yourself the following regarding that behavior:

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Will it have a good reflection on me and PSM?
- Would I like to read about this in the newspaper?

If the answer is "NO" to one or more of these questions, do not do it. Stop.

Administrative staff (which includes PSM managers, directors, vice presidents, corporate officers, and directors) play a key role in the implementation of this Code and in creating and maintaining an ethical work environment. This includes:

- Understand, accept, and enforce the Code.
- Project the image of an ethical leader and maintain a work environment that supports the Code.



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- Educate members of the workforce on the meaning and application of the Code.
- When evaluating members of the workforce or independent contractors consider the conduct in relation to the Code and policies.

We have a duty to report any known or suspected violation of this Code. Reporting a known or suspected violation shows responsibility and fairness and helps protect PSM's reputation and assets. Everyone is encouraged to speak with their supervisor, manager, Compliance Officer, or other appropriate official regarding any observed illegal or unethical behavior, any suspected Code violation, or questions about the best course of action to take when faced with a situation where a legal or ethical issue is unclear.

To report acts or suspected violations of the Code or illegal activities, you can also contact the following personnel at PSM:

- Human Resources Director
- Compliance, Privacy and SIU Director
- Chief Administrative Officer (CAO)

The ethics helpline and website www.planmenonita.ethicspoint.com are available to individuals seeking guidance or wanting to report any known or suspected violation of the standards contained in the Code, in complete confidentiality and without fear of retaliation or intimidation. These resources are intended to complement existing internal communication channels and are not intended to replace the management team.

The Ethics Helpline is available 24 hours a day, seven days a week. The line is designed to function as follows:

- Each concern will be carefully evaluated before it is referred for investigation or resolution.
- The concern will be addressed quickly, in complete confidentiality and in a professional manner.
- The concern will be addressed by the appropriate staff, which may include representatives from Compliance and Ethics, Human Resources, Legal Affairs, and Security.
- A report is prepared for the evaluation of the Chief Administrative Officer for subsequent discussion with the corresponding executives of PSM.



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- A unique tracking number will be assigned so that you can receive electronic responses to your report.

Cooperation with Investigations Conducted by Federal and State Agencies

PSM expects full cooperation of all directors, corporate officers, members of the workforce, agents, participating healthcare providers, representatives of delegated entities, consultants, and independent contractors during and after internal or external investigations. This duty includes providing reasonable and honest information, discussing facts that can be validated with supporting documentation, and being available for questioning by internal or external investigative officers. Collaboration with these agencies in the investigation processes is a protected activity and, therefore, no employee, corporate officer or director may take or participate in acts of retaliation or intimidation against them.

No discrimination, no retaliation, no intimidation

PSM will not discriminate or allow retaliation or intimidation against you from PSM or others for reports or complaints made in good faith or for participating in an investigation of violations of this Code, the Compliance Program, or any internal policies or procedures, or any other unethical or illegal behavior.

Any director, corporate officer, employee, or independent contractor who harasses, threatens, or retaliates against another director, corporate officer, or employee or independent contractor for reporting compliance violations or engaging in other corporate compliance activities will be subject to disciplinary or corrective action.

If you believe you are the victim of retaliation or intimidation, we urge you to immediately inform the Human Resources Division.

False Accusations

PSM will protect any employee or independent contractor who raises a concern in good faith and honesty, however knowingly filing a false accusation will constitute a violation of this Code.

Confidentiality

Confidentiality, including maintaining the anonymous identity of the informant, will be protected, subject to applicable laws, regulations and/or legal procedures. Every employee, contractor, business associate or representative of a delegated entity is expected to fully cooperate during an internal, external and/or governmental investigation.



Investigation

PSM will initiate a reasonable investigation immediately after the date the alleged non-compliance was identified.

Consequences of Non-compliance

Anyone who violates any provision of this Code, the Compliance Program or other internal PSM policies and procedures is subject to disciplinary or corrective measures that will be applied in a timely, consistent, and effective manner. This includes those instances where corporate officers and members of the workforce deliberately fail to report a compliance violation or detect a compliance violation due to gross negligence or reckless conduct of the corporate officer or employee; or, when acting as supervisors, they do not adequately monitor compliance by those supervised by the corporate officer or employee. The degree of corrective action will depend on the nature and circumstances of the violation.

Some violations may be so serious that they justify immediate notification to government authorities before or simultaneously with the initiation of an internal investigation.

Ensuring Compliance

Distribution of the Code of Ethics and Conduct.

PSM's Compliance Director and Chief Administrative Officer will take the necessary measures to guarantee the compliance described in this Code and its amendments are available to all directors, corporate officers, members of the workforce, contractors, and delegated entities. All are expected to strictly comply with the applicable provisions of this Code and the PSM Compliance Program.

As a condition of retaining a position or employment at PSM, each corporate officer or employee must certify that the corporate officer or employee has received, read, and will comply with this Code and all other company standards of conduct. Distribution of the code to third-party vendors should generally be done by including standard descriptive language that references the Code in the applicable contract or purchase order agreement.

Training

Trainings on this Code and the principles of the Compliance Program will be available on a regular basis to directors, corporate officers, members of the workforce, and delegated entities. Directors, corporate officers, or members of the workforce who need additional assistance in understanding this



Code or the principles of the Compliance Program should contact the Compliance Director and /or Chief Administrative Officer. All directors, corporate officers and members of the workforce are required to attend periodic compliance training as a condition of employment or have an office at PSM. Any corporate officer or employee who does not attend designated compliance trainings may be subject to disciplinary action up to and including termination.

Annually, all employees, contractors, business associates and representatives of the delegated entities, will sign the PSM 007-01 Certification Code of Ethics and Conduct-Compliance Program (Annex 1) in which they commit to comply with this code and will evidence compliance with training on the Code of Ethics and Conduct.

Open-door Policy

If you have any suspicions or concerns regarding compliance with this Code, we recommend that you report them directly to management. It is important that you speak up immediately so that your concerns can be addressed. You can contact either your Human Resources Representative and/or the Compliance Officer for guidance if you think your supervisor cannot address your concern or if you believe that your supervisor is part of the problem.

Equal employment opportunities, without discrimination and harassment.

Our policy is to foster a positive and productive work environment that promotes equal employment opportunities and prohibits discriminatory practices. PSM is an equal opportunity employer. PSM prohibits all forms of discrimination and bases its employment decisions on an individual's qualifications, abilities, and performance, without regard to race, color, sex, age, disability, veteran status, religion, national origin, ancestry, sexual orientation, gender identity or any characteristic protected by applicable law. Retaliation based on your report or complaint of discrimination is prohibited. You should immediately inform your Human Resources representative if you understand that she has been the victim of retaliation. PSM will take appropriate disciplinary action against any individual who has been shown to have taken adverse action against them due to their complaint or report of alleged discrimination.

Alcohol and drug-free workplace

We are committed to providing an alcohol and drug-free workplace, which helps facilitate a safe and healthy work environment. None of us should report to work under the influence of alcohol and/or



illegal drugs. In addition, you must not manufacture, distribute, sell, or possess illegal drugs or prohibited substances.

Illegal substances should not be stored in your vehicle while it is on premises owned or controlled by PSM. Searches for properties owned or controlled by PSM may be conducted at any time, including those used or in the possession of any employee, agent, officer, director, consultant, and independent contractor. PSM may also take all reasonable and legal steps to search for members of the workforce, agents, officers, directors, consultants and independent contractors and their properties within facilities owned and controlled by PSM.

Workplace and domestic violence

PSM will not tolerate acts of violence, threats, harassment, intimidation, willful or reckless destruction of property, or other disruptive behavior in its workplace, facilities, or any other location where an event hosted or sponsored by PSM takes place. If you witness, are subject to, or have knowledge of threatening behavior toward yourself or a member of the PSM workforce, you should immediately report it to your supervisor, Compliance Officer, or the Human Resources Division. Support for the victim is important for the proper functioning of the established security plan.

PSM has a legal responsibility to protect any employee who reports being the victim of a pattern of domestic violence. In fact, PSM is required to apply for an employer domestic violence protection order and establish a security program to protect you while you are at your workplace. Employees facing this situation are expected to immediately notify the Compliance Program, who will coordinate any subsequent management to protect them. Annually, PSM will offer compulsory training about Domestic Violence.

Weapons

PSM prohibits anyone from keeping weapons on property owned or controlled by PSM. Additionally, weapons cannot be stored in vehicles parked in company-owned or controlled parking lots. Weapons include, but are not limited to, pistols, bladed weapons such as blades and/or ammunition, among others.

Anti-Fraud Policy

PSM has a zero-tolerance policy for fraudulent or illegal acts. Fraud is any willful conduct carried out with the intention of misrepresenting facts to obtain a benefit to which an individual is not entitled. PSM is firmly committed to complying with federal and local anti-fraud statutes. Consequently, for all



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business lines, PSM has a comprehensive program to control, monitor, detect, investigate, and refer any fraudulent or illegal activity to public agencies. Therefore, it is the duty of employees, contractors, business associates and representatives of the delegated entities to report any false claims, illegal activity, or violation of the Code to appropriate personnel.

Conflict of Interest

PSM corporate policy prohibits any conflict of interest. Conflict of Interest is defined as "a series of circumstances that create the risk that professional judgment or actions about a primary interest are influenced by a secondary interest." It occurs when the private interest of an individual interferes in some way or appears to influence the interests of the organization. By way of example, an employee, contractor, business associate or delegated entity could be directly or indirectly related to a current or potential supplier, competitor, or client of PSM and, therefore, derive some gain either in goods or money as a consequence of this relationship.

External financial or business relationships with members of your immediate family, or individuals with whom you have a close personal relationship, may create a potential conflict of interest and are subject to the requirements of this policy. Contractors have a duty to avoid conflicts of interest as specified in their contracts and by laws governing fair treatment in business relationships. This duty includes the protection and limitations on the use and disclosure of corporate intellectual property, trade secrets, technology, customer/member/supplier data, and other confidential and proprietary information. PSM expects contractors to faithfully fulfill these duties.

The conflict of interest must be fully disclosed by any employee, contractor, business associate or delegated entity, regardless of whether it is determined to exist at the time of notification.

Conflicts of interest may not always be clear. Therefore, any questions should be consulted with higher management levels or with the Compliance Director and/or Chief Administrative Officer. If you observe, find, or discover a conflict or potential conflict, you should report it to your supervisor, manager, or the Compliance Officer.

Annual Disclosure of Financial Conflicts of Interest or others that Create Potential or Current Conflict of Interest

PSM requires that each year, employees, contractors, business partners and representatives of delegated entities must disclose the following:

- All interests that may create or potentially create a conflict of interest.



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- Whenever applicable, provide a statement suggesting how the conflict of interest can be avoided or mitigated.
- If there is no conflict-of-interest information that must be disclosed, it will certify that there is no such conflict.

To facilitate this annual disclosure, the Disclosure Form on Financial or Other Interests that create Potential or Current Conflict of Interest must be completed annually (Annex 2).

Confidential information

We cannot disclose confidential information entrusted to us by PSM, its providers, customers, or anyone else, except when authorized or required by law to do so by the PSM Office of Legal Affairs. The foregoing, in compliance with regulations or legal procedures. If you understand that there is a legal obligation to disclose such information, you should consult the Office of Legal Affairs. It is PSM's policy to protect the privacy of customers, members, plan participants, policyholders, and their employees and other similar former, present, and prospective parties, in accordance with applicable law. All individually identifiable personal information will be collected only as reasonably necessary for the conduct of PSM's business. In addition, it is PSM's policy to protect your information assets from accidental or unauthorized modification, destruction and/or disclosure. We must protect corporate information assets and we must follow the requirements provided by PSM. Protecting confidential information requires our compliance with all related policies and procedures, protecting paper documents and individual workstations; manage passwords correctly, use secure software, backup critical data; and use PSM networks safely and responsibly.

It is expected that if a consultant, business associate or representative of a delegated entity experiences a security breach in which confidential information is exposed, a process will be put in place to mitigate, to the extent possible, any detrimental effects. This includes the duty to immediately notify PSM and each affected individual and to cover all costs incurred by PSM if it must notify its clients of such exposure.

Antitrust and other Competition Laws

Antitrust laws are designed to ensure a fair and competitive free market system in which no company has a monopoly on providing a service or product. While PSM competes vigorously in the marketplace, it complies with applicable antitrust and competition laws wherever it does business. This means that PSM competes on the merits of its services, prices, and customer loyalty. PSM



independently determines the price structure of its products and supplier contracts, subject to the applicable regulatory review. Our actions in the market define who we are as a corporation. We are committed to avoiding conduct that is or creates the appearance of illegal anti-competitive activity.

Gifts

No employee, contractor, business associate or delegated entity may request or accept gifts, tips, favors or any object of monetary value from current or potential beneficiaries, vendors, contractors of PSM. Any employee, contractor, business associate or delegated entity that has a direct relationship with PSM, will reject or return any gift and will notify the Compliance Director Program of such gift.

A "gift" is defined as anything of monetary value offered either directly to or on behalf of a current or prospective recipient, vendor, or contractor, except promotional material of nominal value such as pens, calendars, mugs, and others which have intended for mass distribution and may not be resold. Gifts include but are not limited to personal gifts such as sporting goods, home furnishings, and liquor; lockers for social or sports events, personal loans or privileges to obtain merchandise, among others.

Political Activities

PSM employees will not participate or intervene in any political campaign in favor of or in opposition to any candidate for public elections, while it is within working hours or when acting in their official capacity/position at PSM. Employees, contractors, business associates or delegated entities may not use the name, logo, or any other means by which PSM, its facilities or other PSM resources are recognized to carry out political activities.

Lobbying

Lobbying is generally defined as those written and/or verbal communications that are aimed at influencing (for or against) some specific legislation. Any lobbying activity by an employee, contractor, business associate or representative of a delegated entity, must have the authorization of the PSM Administrator.

Cooperation and Honest Deal with Government Officials

Transactions with the government are covered by special legal rules and are not the same as doing business with private parties. In general, do not offer payment of money, gifts, services, entertainment, or anything of value to a local, federal, or foreign political candidate, official, or public service agent, directly or indirectly, in exchange for favorable treatment. To be responsible members of our business community, we must comply with the law wherever we do business, regardless of



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local law or custom. Bribes, kickbacks, or payments are prohibited under any circumstances. A bribe is giving or offering something of value to a public service official or agent to influence a discretionary decision. Examples of a bribe include paying a public service official or agent to encourage a decision to grant or continue a business relationship, to influence the outcome of a government audit or inspection, or to influence a tax ruling or any other legislation. PSM expects members of its workforce to exercise caution in preparing and submitting documentation to the government. Cost and price data provided in connection with government contracts and proposals must be current, complete, and accurate.

Cooperation with investigations conducted by Federal or State government agencies

From time to time, PSM may be asked to cooperate with a government investigation or respond to a government request for information about how we conduct our business. The petition may reach the PSM administration through official government channels or a member of a law enforcement agency, such as the Department of Justice, the Federal Bureau of Investigation (FBI), the Office of the Inspector General of the Department of Health and Human Resources (HHS-OIG), the Center for Medicare and Medicaid Services (CMS), the Health Services Administration, among others. Any of these entities may contact you individually.

It is PSM's policy to fully cooperate and honestly in all these matters. To ensure that this process is carried out efficiently, any employee, contractor, business associate, or delegated entity must immediately notify PSM's General Counsel and inform them that a government representative has contacted you. The decision whether to cooperate with your investigation is up to you alone and you will not be disciplined, punished, or retaliated against if you choose to do so. Although you are free to cooperate individually with government investigators, you may not provide documents or data belonging to PSM or under its custody and control in response to a government request for information without first obtaining permission from PSM's legal counsel.

Contractors and Federal Agencies

Contractors must be in good standing and comply with the federal and local government. They should also conduct periodic background checks on their existing hires, as well as those in the process of initiating, to avoid hiring entities or individuals sanctioned by the federal government. To the extent required by law, PSM is responsible for and will supervise its delegated entities within its contracting chain that perform functions or activities related to its business.



Failure of a delegated entity to comply with the principles and standards described in this Code, or with its contract with PSM or a PSM tier-one, merged or related entity, may result in financial penalties, or the cancellation or termination of functions or activities hired. Healthcare providers and delegated entities are expected to:

- Check the federal lists of the Office of Foreign Assets Control (OFAC), Health and Human Services-Office of Inspector General (HHS-OIG), System for Award Management (SAMs) and the General Services Administration (GSA) to verify that employees do not appear in these lists before hiring or signing the contract, and once a month thereafter.
- Remove any person or entity that appears in any of these lists from any work related to PSM.
- Notify PSM of these removals and actions that were taken in a timely manner.

Document Retention

Directors, corporate officers, and members of the workforce may dispose and destroy corporate records and files only in accordance with corporate policies. Legal and regulatory practices require the retention of certain corporate records and files for various periods, particularly with respect to taxes, personnel, health and safety, government health programs, contracts, and corporate actions. When litigation or a government investigation or audit is pending, relevant corporate records and files should not be destroyed until the matter is officially closed. Destruction of records or files to avoid disclosure in legal or administrative proceedings may constitute a civil or criminal offense. Corporate officers and members of the workforce should consult the Office of Legal Affairs or Compliance Officers for information on record retention periods and destruction restriction.

IV. Definitions

Include, in alphabetical order, the meanings of technical terms, abbreviations, and other terms that are not used frequently.

- **Administration:** Any employee of the company with the title of manager or higher.
- **Anything of value:** This phrase literally means any object of value to a public service official, including cash, gifts, meals, entertainment, business opportunities, corporate items, job offers, and tickets to recreational activities, among others.
- **Confidential Information:** in general, it is any information that has not been disclosed to third parties, or any information that may be beneficial to competitors or that may cause harm to



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PSM or its customers if disclosed. The term includes protected health information, strategic or commercial plans, prices, financial data, proprietary corporate information, among others.

- **Conflict of Interest:** refers to a series of circumstances that create the risk that professional judgment or actions approach a primary interest, being influenced by a secondary interest. It occurs when the private interest of an individual interferes in some way or appears to influence the interests of the organization.
- **Corporate Officers:** PSM officers appointed by the Executive Vice President.
- **Gift:** refers to any object of monetary value offered either directly from or in favor of a beneficiary, vendor, or current or potential contractor, except promotional material of nominal value such as pens, calendars, mugs, and others which have intended for mass distribution and cannot be resold. Gifts include, but are not limited to, personal gifts such as sporting goods, home furnishings, and spirits; lockers for social or sporting events, personal loans, or privileges to obtain merchandise, among others.
- **Good faith:** In the context of the report, it means that the individual believes that the information he provides is true and correct, and reasonable evidence can be provided.
- **Independent Contractor:** Means any entity or individual that is not an employee of PSM. For the purposes of this Code, the term independent contractor includes a delegated entity, which includes first-tier, intermediate, and related entities, subcontractors, healthcare providers, vendors, brokers, agents, and participating consultants.
- **Workforce Member:** Employees, consultants, volunteers, apprentices, and others whose conduct, in the performance of work for a covered entity, is under the direct control of that entity, whether they are paid by the covered entity.

V. Compliance

Failure to comply with this or any other privacy or security policy will result in the imposition of disciplinary actions according to the Sanction Policy and Procedures, and as established by the PSM Employee Manual. The foregoing includes and is not limited to legal action being taken for violations of applicable regulations and standards, such as HIPAA, HITECH, the Office for Civil Rights, and other applicable legislation.



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VI. Procedures

Include the operational processes and the steps to follow to implement a policy decision. These operating procedures interpret the policy and define the activities that must be carried out to comply with the directives and objectives established by the policy.

VII. Forms and Related Documents (if applicable))

Include all corporate forms, related policies or procedures, and other documentation.

1. Certification of Commitment to Compliance with the Code of Ethics and Conduct and the Compliance Program Form (Annex 1)
2. Disclosure Form on Financial Conflict of Interest or Others that create Potential or Current Conflict of Interest (Annex 2)

VIII. References

- www.cms.hhs.gov/hipaa
- www.healthir.gov

IX. History of Changes

| Number | Revision Date | Modified and Approved | Section Modified and Justification |
|--------|---------------|---|--|
| 01 | 7/31/2019 | Modified by: Victor Milán Integrity Officer Approved by: William Ruiz Alejandro Chief Compliance Officer | Change of design |
| 02 | 07/15/2021 | Modified by: Victor Milán Compliance Director Approved by: William Ruiz Alejandro Chief Administrative Officer | Annual review and incorporation of forms |
| 03 | 05/02/2022 | Modified by: Victor Milán Compliance Director Approved by: Pablo Almodóvar Executive Vice President | Update Gift Section |



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| 04 | 07/15/2022 | Modified by: Astrid Figueroa Senior Compliance Director Approved by: Nanette Dumont Executive Vice President | Annual review. |