collaborator handbook







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For the purposes of this handbook and all of the documents that comprise it, Evertec® refers to Evertec® Group, LLC. and its subsidiaries and affiliates. Evertec® reserves the right to amend this handbook in whole or in part at any time. This handbook does not constitute an express or implied contract between Evertec® and its collaborators, and does not grant any additional rights to those contemplated by applicable laws. No part of the contents of this handbook limits the ability of Evertec® to terminate the employment relationship at any time and without prior notice, or to modify or eliminate the benefits granted. If there is ambiguity in any provision of any policy or rule established by Evertec®, the Company reserves the right to interpret the same at its discretion.





Message from the President and Chief Executive Officer

Dear Colleague:

This Collaborator Handbook contains the policies, goals and values of Evertec®, as well as other important information you will need as a member of our team.

The success of Evertec® is defined by our ability to work as a team, focused on our organizational values, especially integrity. We must strive to work in an environment in which each of us is in compliance with applicable industry and government policies. This is part of our commitment to excellence and to have our customers as a number one priority, thus ensuring that they continue to choose Evertec as their technology service provider.

We promote diversity and inclusion as a formula for innovation. We value the diversity of thought, ideas, opinions and above all, we believe that each perspective adds a key element to be a leader in our industry. We embrace and promote inclusion in our people, products and services.

I urge you to take the time to read this handbook and become familiar with this important document. We count on you to continue making Evertec® the best technology company in Latin America and the Caribbean.

Morgan "Mac" Schuessler

President and Chief Executive Officer

mission, vision, and values

At Evertec® we are committed in maintaining the highest ethical standards, taking our business decisions responsibly, always. These are the pillars of our company.



mission

We aspire to be the most innovative and reliable technology provider for our clients, communities, and shareholders.



VISION

Technology that speaks your language.

our values



customer satisfaction

Our customers come first. They are the reason for this company's existence.



responsibility

We take responsibility for our actions and the actions of others.



integrity

We always do the right thing. We subscribe to the highest ethical standards.



proactivity

We anticipate. We prevent problems and take advantage of opportunities, before others.



community commitment

It is not always about us. We work for the good of our communities and our families.



innovation

We innovate. We celebrate change and look for ways to always improve.



passion

We are passionate in everything we do. We want to have fun and we want to win.



teamwork

We are a team with shared goals. We respect individual differences, believe in open communication, and leveraging the workload with our unique skills.

ethical principles

integrity

The value that describes the essence of **OUR** professional conduct.

honesty

The basis for the execution of **OUR** business transactions.

trust

The element that strengthens the trust of **OUR** colleagues and clients.

"Every time you do something, act as if everyone is watching." -Thomas Jefferson

ethical culture

Evertec®, Inc. and its subsidiaries (hereinafter, "Evertec®" or the "Company" are committed to act with integrity, honesty and good faith at all times. These principles define our corporate culture and are the foundation of all activity in which we participate. Our Code of Ethics (hereinafter, the "Code" defines and reasserts those standards. It is the responsibility of each collaborator, officer and Executive VP, to read and comply with this Code and with our corporate policies. Collaborators should read the Code as part of their Collaborator Handbook. The success of the Company depends on our actions. That is why every year you will be required to acknowledge having read and complied with our Collaborator Code and Handbook. If there is ambiguity in any provision of any policy, practice established by Evertec®, Company reserves the right to interpret them at its discretion.

The Code does not establish rules, nor does it have the answers for all ethical or unethical situations that may occur in our business relationships. Its purpose is to provide guiding principles to help us prevent, recognize and understand what constitutes ethical, unethical, illegal or inappropriate behavior. When questions or concerns arise, please seek guidance and advice from your leader, Executive VP, Legal Compliance , People and and Culture or the Compliance and Ethics Officer. If the question or concern is related audit, finance or accounting matters, you can also go to the Chief Financial Officer, Internal Auditor or the Audit Committee. You can also report a matter confidentially and anonymously through the Evertec® Ethics bv http:// accessing www.evertecethicsline.com.

There may be situations in which compliance with certain provisions of this Code may be waived. The exemption is a concession made to a collaborator, executive VP or director to excuse compliance with a provision or obligation imposed by the Code. If you are a collaborator and wish to request an exemption, please contact the Compliance and Ethics Officer. If you are an executive officer or Executive VP, please contact the Executive VP of Legal and Compliance, who will present the request to the members of the Evertec® Board of Directors or to the Audit Committee. If the exemption is approved, it will be disclosed according to the law.

It is our responsibility to comply with the standards and principles established in Evertec®. Therefore, the violation of a law, rule, regulation or policy could also constitute a violation of our Code. Depending on the country, part or portions of this Code may be supplemented or replaced by the laws and regulations of the jurisdictions in which the directors, officers and collaborators of Evertec® do business. The Code is part of our compliance program and is essential in the internal structure of the company.

We believe in applying our values of integrity, honesty, and trust in all our actions.

You should always strive to comply with all laws and regulations that apply to our local and international operations.

No retaliation will be exercised, nor direct or indirect disciplinary actions will be taken against any person who, in good faith, reports a complaint or assists in an investigation of unethical suspicious conduct or any violation or potential violation of this Code.

general obligations of ethics

The directors, officers and collaborators of Evertec® have the obligation to adhere to the ethical principles of integrity, honesty, and trust, and together, foster an ethical culture in our business transactions. The following general guidelines will help you fulfill this responsibility:

- Avoid conflicts of interest, whether real or apparent, in your personal and professional relationships.
- Always comply with all government laws, regulations and corporate policies.
- Act in good faith, responsibly, and with due care, competence and diligence in all business transactions in which you represent Evertec®.
- Protect confidentiality and prevent unauthorized disclosure of non-public information about Evertec®, its customers, suppliers, and other third parties.
- Share knowledge and keep the most important and relevant skills to the needs of our investors.
- Promote ethical behavior among your colleagues, in the work environment, and in the community.
- Report any conduct that is deemed to constitute a violation of law, or a conflict of interest or business ethics, including transactions or relationships that could reasonably have led to or result in a violation.

Consider the effect of your actions and seek direction. If you are not sure about a matter of ethical conduct, ask yourself the following questions:



- Is it legal?
- Is it ethical?
- · Is it consistent with the Code of Ethics?
- · Will it have a favorable impact on me?
- Will it have a favorable impact on the Company?

If your answer to any of these questions is NO, do not do it.

conflicts of interests

You should never use or attempt to use your position in Evertec® to obtain undue benefits for yourself, your family members or others. You have the obligation to avoid, and when it is not possible to avoid, you must disclose in the manner indicated in this Code, any activity, agreement, investment or interest or any other situation that exists or appears to exist that causes you to place your own interests or those from a third party above your obligations towards Evertec®.

¿when does a conflict of interest occur?

It occurs when the personal interests of an individual influence their impartiality or interfere or appear to interfere with the interests of Evertec®.

Because it is impossible to describe every possible conflict, you must exercise your sound judgement. We all have a duty of loyalty to our Company, and in connection with that duty, we must avoid conflicts of interest or the appearance of a conflict of interest related to Evertec®. If you become aware of a conflict of interest or think there is a material transaction or relationship that could reasonably result in a conflict, please communicate this information through any of our aforementioned communication ethics channels.

Conflicts of interest may arise when you are directly or indirectly related with a provider, supplier, or possible supplier or provider, The following are examples of the most common areas where conflicts of interest, real or perceived, may arise:

gifts and entertainment

With certain limited exceptions, gifts other items of value, from or to Evertec®'s suppliers or current or prospective customers may not be accepted or given. This applies especially if by doing SO. Evertec® collaborators create the can impression that the Evertec® business judgement has been or could be compromised. Similarly, Evertec® directors, officers and collaborators accept (except cannot authorized compensation), provide or allow close family members to accept or give gifts, services, loans or other items of value from or on behalf of towards customers, suppliers or others, in exchange for a past, present or future business relationship with Evertec®.

recognize that gifts little value of or thank-you details can be ways that business people use to show appreciation. Items of nominal value, reasonable meals and entertainment expenses promotional items of the company may allowed. You can refer to the Guidelines for the Declaration of Possible Conflicts Interest for information related to gifts entertainment. Other special and more restrictive rules apply with respect to gifts and entertainment to government officials, indicated later in the summary of the Foreign Corrupt Practices Act.

¿what is a gift?

Anything of value that you give or receive without a payment, or without receiving a discount greater than that received by another person in a similar situation.

activities outside of business

Evertec® encourages your participation in unaffiliated non-profit companies and in some companies or for-profit organizations. However, in order to avoid even the appearance of a conflict of interest with Evertec®, you must notify your participation to the Compliance and Ethics Officer, and disclose it in the Declaration of Possible Conflicts of Interest. If the entity is a competitor, supplier or potential supplier of Evertec®, you must request the approval of the Compliance and Ethics Officer before participating or collaborating with any of said entities. If, in compliance with this requirement, you accept an invitation or appointment for an unaffiliated entity, you must ensure that you do not share confidential information with that entity.

additional jobs, other businesses, and political appointments

If you want to keep another job in addition to the one that you have at Evertec® or operate a business or perform professional services outside Evertec®, except work agreement or internal rules prohibits it you must request the prior approval of the Compliance and Ethics Officer. The additional employment or business cannot create a conflict of interest with your duties and responsibilities as a collaborator at Evertec®, nor affect your performance or efficiency and you must report it in the Declaration of Possible Conflict of Interest. After the additional employment or event is disclosed and notified, People and Culture and / or the Compliance and Ethics Officer will notify you of any possible conflict of interest.

You can accept jobs or contracts as a professor or for teaching and retain any compensation you earn, as long as it does not interfere with your employment or the Evertec® business line. However, you cannot accept political appointments or positions unless you have written authorization from the Executive VP of People and Culture

stating that the appointment does not interfere with your responsibilities in Evertec®, does not affect or endanger the image or reputation of the Company, or identify the Company with a political party, candidate or political organization. An exception will be applied to collaborators from Evertec subsidiaries where statutory dispositions conflict with this prohibition. For additional information, please refer to the Political Activities, For additional information, please refer to the Political Activities, Contributions and Lobbying section of this Code.

corporate opportunities

Sometimes, it is difficult to draw the line between what is a personal benefit and a corporate benefit, and there may be activities that result in both personal and corporate benefits. Before using the property, services or benefits of E vertec®, you must obtain the approval of our Compliance and Ethics Officer.

In addition, except as provided in the certificate of incorporation of Evertec®, you must comply with the following obligations, responsibilities and limitations in relation to corporate opportunities:

- Promote the commercial interests of Evertec® when the opportunity to do so arises.
- Avoid taking or directing to a third party any business opportunity you discover through the use of corporate property, information or position, unless Evertec® has already been offered the opportunity and has rejected it in writing.
- Abstain from using corporate property, information or your position to compete with Evertec® or for your personal benefit.

If there is a conflict between the provisions of the Code and the certificate of incorporation of Evertec®, the provisions of the certificate of incorporation prevail.

business relationships with related parties

As part of your commitment to the corporate standards of honesty and loyalty, you are responsible for notifying the Compliance and Ethics Officer of a ny b usiness r elationship or proposed business transaction that Evertec® may have with any company in which you or a family member of yours may have a direct or indirect interest.

In addition, you must notify any of the following situations: (1 if you or a relative of yours derives a benefit from this company, or (2) if the family member is a collaborator of the company and the relationship or transaction with the company can give the appearance of a conflict of interest. You must be familiar with and comply with our Transaction with Related Parties Policy which requires the prior approval of the Board of Directors or the committee authorized by the Board for such transactions, before Evertec® participates in these transactions.



we must negotiate fairly with our customers, service providers, suppliers, competitors, and with our fellow collaborators.

report ethics and compliance issues

You are responsible for enforcing our ethical standards. If you observe or become aware of any behavior that concerns you, or that you suspect may be a violation of our Code, you should notify the matter promptly, even if you are not sure that it constitutes a violation of the Code. By reporting suspicious acts or behavior when they occur, you give the Company the opportunity to address the situation and correct it; ideally before a violation of the law occurs, or the health or safety of a fellow collaborator is jeopardized. A violation of our Code, including the failure to report any potential violations of this Code that may be committed by others, may be subject to severe disciplinary action including, but not limited to, termination of employment or termination of a contract, as applicable. We encourage you to inform your leader, Manager, Executive VP of Legal and Compliance, People and Culture, the Compliance Ethics Officer or through the Ethics Line if you understand that a deviation has occurred to the norms of the Code, or if you observe an illegal or unethical behavior or act.

We urge you to act ethically and honestly. We guarantee that there will be no retaliation and we will not exercise adverse disciplinary actions if you inform in good faith any real or potential violation of our Code or if you collaborate in an investigation about an act that is unethical or suspicious.

help in investigations

Your cooperation in identifying and reporting existing or potential ethical problems is crucial for us. Our Company does not take or tolerate retaliation, harassment or discrimination against those individuals who provide information in good faith, or assist in any legitimate investigation of any agency responsible for compliance with the law, such as regulatory agencies or governmental entities.

if you have questions or concerns related to ethical or compliance issues, please request help and assistance through the mechanisms available to you at evertec[®].

You must cooperate with all internal and external investigations related, but not limited to, the following areas: accounting, auditing, compliance, ethics and labor issues. You cannot withhold or avoid communicating information related to these matters. Making false accusations withholding knowingly false. information relevant to the investigations, and interfering or refusing to cooperate with an investigation may result in the imposition of disciplinary actions, including termination of employment. In certain circumstances this may constitute a criminal act that may result in the imposition of severe penalties not only for the Company, but also for you in your personal character.

cooperation with government investigations

From time to time, we may be required to participate or cooperate with a government investigation, or respond to a request for information about our business from a government agency. The petition can arrive from the government entity through the official c hannels e stablished to the management of Evertec®, or you can be contacted individually by an official of a law and order agency, such as the Department of Justice or the Federal Bureau of Investigation (FBI, by its acronym in English. To ensure that this process is carried out properly, you must notify Legal and Compliance immediately.

The decision to cooperate or not with government authorities during an investigation is yours and you will not be disciplined, sanctioned or reprimanded if you decide to cooperate.

Although you are free to cooperate with a

government investigation in your personal character, unless a Federal or State statute requires it (e.g. Whistleblower, you cannot provide documents or information that pertain to, or are in the custody or control of Evertec®, in response to a request for information from a governmental agency or instrumentality, without obtaining the prior approval of the Executive VP of Legal and Compliance. The foregoing does not affect or interfere with your right to participate, cooperate or assist in investigations or proceedings within a governmental agency, examining board, commission, or other governmental regulatory or investigative body.

by reporting suspicious acts or behavior when they occur, you give the company the opportunity to address the situation and correct it; ideally before a violation of the law occurs, or the health or safety of a fellow collaborator is jeopardized.

relationship with our investors

financial responsibility

We have a responsibility towards our shareholders. Our shareholders are people who have an interest in our Company and who are affected or may be affected by our actions. Therefore, it is crucial that we comply with all rules and regulations applicable to the financial and a ccounting reports of the Company, so that we can disclose the results of our operations and our financial condition accurately and on time.

This responsibility is not only required by law, but is also the central axis of our commitment to our shareholders. A fundamental part of this responsibility is to keep our books and accounting records with the most detailed and accurate information that appropriately reflects all our business transactions. Our financial reports must be prepared in accordance with generally accepted accounting principles and reflect the financial condition and results of Evertec® in all relevant and substantial aspects. Furthermore, we must prepare and maintain accurate tax records, file tax reports, and pay taxes on time and in compliance with all applicable laws.

For the functions that correspond to them, the Chief Executive Officer, the Chief Financial Officer and the members of the Finance are particularly obliged to provide accurate, complete, objective, relevant, timely comprehensible information. These characteristics ensure the fair and complete disclosure of the information contained in the reports and documents that our Company Securities submits to the Exchange Commission, as well as to the authorities. You must address any concerns or complaints related to the financial and accounting information to the Chief Executive Officer, the

Financial Officer, a member of the Audit Committee, or anonymously through: www.evertecethicsline.com.

who do we consider an interested party?

Our shareholders, creditors, customers, suppliers and our community.

records, and reports

The accuracy and analysis of our financial reports are very important aspects for our business and our operations. The files, data and information that we generate, retain, use and manage must be correct and complete. Business documents and business records that have to be kept by Evertec®, or that will be addressed to third parties, must comply with a reliable language and content that demonstrates professionalism. We must be aware that both the Company and third parties may in the future trust and interpret this information that we generate in business management. Everyone at Evertec® must comply with our Document Retention Policy at all times. In doing so, we must keep in mind our obligation to retain documents that are potentially relevant to any litigation, governmental investigation or administrative proceeding expected or in process. We are all responsible for the integrity of our records, books, records, and reports.

media, publications, and public appearances

The ability to communicate with the investment community is paramount to our success as a business. You must be familiar with our Disclosure Policy and with the Social Media Participation Guide and with any other relevant policy or guidance. Only official spokespersons appointed by Evertec® may provide comments to the media, or materials



for publication to the stock market participants in the name of Evertec®. All media or investor questions that request official information or Evertec® standing on the matter, should be referred to Product, Marketing, Communication and Innovation or to our Investor Relations Officer. To validate who these officers are, you can access the Evertec® website under the Investor Relations section.

Before publishing any material in written or electronic format, make speeches, give interviews, make similar appearances or answer questions from media related to Company, its operations, clients collaborators. vour capacity or in as a collaborator of Evertec®, you must first notify the manager of vour business area and obtain the approval of Legal and Compliance and Product. Marketing, Communication and Innovation. Any written, electronic material or media consultation includes the following:

- Internet
- · Multi-media and social networking sites
- Blogs
- Microblogs
- Podcasts
- Forums
- · Content communities
- Wikis

When using social media in a personal capacity, you must comply with the Code, and with all applicable corporate policies, guidelines, laws and regulations. This includes, but is not limited to, copyright, confidentiality, privacy, fair use, and financial disclosure laws. You are personally responsible for the content of what you post on Internet sites. Therefore, before using electronic means, consider the risks and rewards involved. Keep in mind that any conduct that you assume that adversely affects your performance on the job, the performance of other employees, or otherwise affects members, customers, suppliers, consultants working on behalf of Evertec® or the legitimate interests of Evertec®, could result in disciplinary actions that could include dismissal. Inappropriate publications such as discriminatory comments, harassment, threats of violence, or similar misconducts, including unlawful conduct, will not be tolerated and may be subject to disciplinary action that could lead to dismissal.

¿who are authorized people?

The persons authorized to speak on behalf of Evertec® are the Chief Executive Officer, the Chief Financial Officer, the Product, Marketing and Communication Innovation Director, and the Investor Relations Officer.

What happens if I am in the cafeteria and overhear other collaborators talking about some confidential information? Is the fact that this information was not directed to me make any difference? No. As long as you are working at Evertec, you should restrain from acquiring any benefit from the information heard.

Make sure to always be honest and accurate when you post information or news, and if you make a mistake, correct it quickly. Remember that the Internet archives almost everything; therefore, even deleted publications can be found. Be frank about the publications that you have altered. Never post information or rumors that you know are false about Evertec®, its subsidiaries, collaborators, customers, suppliers, consultants or competitors.

value trading with non-public material information (insider trading) The use of

nonpublic material information occurs when individuals with access to non public information about a public company, buy or sell shares or securities of that corporation, based on the information they hold. This conduct is not ethical, precisely for the benefit of having confidential and material information, not public, which creates a disadvantage for other investors who do not have the same

The Evertec® Non-Public Material Information Trafficking Policy prohibits any person who possesses material, non-public information about customers, partners, competitors, suppliers or any other company, from: (1) buying or selling

Company stock while in possession of such information, (2) share the information with third parties outside of Evertec®, including but not limited to family members, clients, colleagues and friends, through any advice, recommendation or opinion, until such information is public or no longer considered relevant. The information is relevant if it could influence the determination of an investor to buy, sell or retain that value or share of the Company. The information is considered confidential non-public if it has not been disclosed to the public.



whom you have shared non-public material information obtain a profit for the use of it. The use of non-public material information about other public companies is also prohibited. Any inappropriate use or disclosure of this nonpublic material information may expose you, or it may expose the Company or any person with whom the information is shared to severe penalties, both criminal and civil, under applicable laws. These penalties may also be imposed on our directors, officers, collaborators if they fail to take reasonable measures to prevent inappropriate use of this information. You are responsible for reviewing and complying with our Securities Traffic Policy with Non-Public Material Information, its respective procedure and the Disclosure Policy, among others, as include additional these requirements, restrictions and other applicable procedures.

asset protection

protection and use of our assets

The tangible and intangible assets of Evertec® are part of our economic resources and we have a duty to protect them. Evertec® assets, which include cash, securities, business plans, intellectual property, physical property, and services, can only be used for legitimate business purposes. The unauthorized use of Evertec® assets constitutes a violation of the duties we have towards the Company and may constitute an act sanctioned by law and subject to disciplinary action. The neglect and waste of our assets are also considered a violation of our responsibilities.

The property in the name of Evertec®, or under the control of the Company, may be registered at any time, including that property used or in the possession of the collaborators, agents, officers, directors, consultants and independent contractors. All messages stored in Evertec® electronic systems, sent and / or received by a collaborator or non-collaborator, are the property of Company. For these reasons, to protect the confidentiality of our customers. collaborators and / or Evertec®'s own business, the Company reserves the right to monitor, review and / or disclose any and / or all messages created. received or sent through Evertec® electronic systems. addition, Evertec® reserves the right to modify, block and / or re-direct the receipt and / or sending of any electronic message. The Company will also take the necessary measures to legally register collaborators, directors, consultants, agents. and independent contractors or their properties in the facilities occupied, controlled by, or belonging to the Company.

how may i use the assets of the company?









The telephone, email, voicemail, or any other computerized system or equipment are primarily for corporate or business purposes. Therefore, the use of these for personal benefit should be kept to a minimum. They should never be used in a way that is harmful or detrimental to the Company.



The facilities and offices of evertec®: Physical facilities can only be used for business matters. The use of these for any other activity that does not relate to Evertec®'s regular operations must be approved by the Compliance and Ethics Officer.

protection of intellectual property

We must respect intellectual property rights at all times. The unauthorized or illegal use of intellectual property is an act sanctioned by law. Any violation of the intellectual property rights of an author may expose our Company to economic litigation or sanctions. At the same time, we take the protection of intellectual property belonging to Evertec® very seriously. This includes making sure that our programs, patents, service marks or symbols are used appropriately, both by our collaborators and by third parties.

If you have any questions related to the intellectual property symbol that applies to a particular case, or you suspect a violation of these rights, please consult Legal and Compliance. Before copying or distributing any printed or electronic publication for internal use, make sure you do not incur in a violation of copyright or intellectual property rights. You must refer all questions related to the validation process to Legal and Compliance.

In addition, it is your duty as our collaborator to inform us of any possible interest in any invention, improvement, or innovation of a product of your responsibility (hereinafter, "innovation" created or made during your employment with Evertec®. If your contract or employment with Evertec® terminates, all rights to intellectual and information property generated or obtained as part of employment or contractual relationship with the Company will remain the exclusive property of Evertec®. All innovations created or invented by a collaborator will be considered created during the employment relationship with Evertec®, unless the innovation: (1 has been developed in their private time, (2 is not part of their responsibilities or tasks with Evertec®, and (3 has not been generated using the physical facilities or Evertec® equipment.

what is "intellectual property"?

Intellectual property is the result of the creation of the mind, and includes ideas, formulas, works of authorship, business secrets and trademarks protected by the laws of patents, trademarks or copyrights.

privacy of collaborator information

Certain information about you as a collaborator can be private and confidential and we are committed to protecting it. You may not share or discuss confidential information of collaborators outside of Evertec®, unless you have been authorized by the collaborator who owns the information or is required by law, rule, regulation, subpoena or order issued by a court of competent jurisdiction; or as requested by a judicial, administrative or legislative authority. As an example, this type of confidential information could include medical information or personal data, such as residential addresses, social security, among others.

confidential and privileged information

During the performance of your Evertec® functions, you will often know or have access to confidential information. The proper handling of this information is one of our main responsibilities and is essential for the success of our business. Our customers, suppliers, and business partners trust us to protect their confidential information. You may use the confidential information only for the use for which it was shared, except when its disclosure is authorized or required by law, regulation, legal procedures or authorized by the owner of the information. Here are some examples of confidential information:

- Proprietary or non-publice information
- · Current or potential clients
- Suppliers or groups of joint ventures
- Prices
- Products
- Business plans
- Techniques

- Data
- Programs
- · Ideas
- Documentation
- Negotiations
- Processes
- Methodology and financial information
- · Information that is not of general knowledge
- Information that is not available to the general public
- · Product of collaborators' work

how can I know what information is confidential?

* The best practice is to presume that all information you have about clients and the business is confidential, unless it is clearly stated that it is not confidential or that you are authorized to disclose it.

Share this confidential information with others (inside or outside of Evertec® only when strictly necessary. You have the duty to protect confidential information as if it were your own and to take the necessary precautions before sharing it, inside or outside Evertec®. Do not share confidential information with your friends or family, and do not discuss it in places where others can hear you. Do not reveal confidential information and do not share it with collaborators who are not involved in providing services to the owners of the information, unless you are authorized and legally allowed to share it. You are responsible for protecting the confidentiality of non-public information obtained in connection with Evertec® activities. This duty continues even after termination of employment or association with Evertec®.

when do we meet the criteria of the need to know the information?

When the person needs the information to be able to perform the tasks or duties assigned to their position.

privacy of customer information and data protection

We are committed to maintaining the information of our customers and that of their customers. Since our main clients are financial institutions, their clients can be individuals whose information privacy is protected by numerous laws, regulations and industry rules or practices. The confidential information that must be protected varies, depending on the rules of the countries in which the individuals are located, but as a general rule they include:

- Personal information
- · Accounts balance
- Investment reports
- Credit history
- Social Security
- Other personal identification numbers

We must comply with our Privacy and Information Security Policies, and with their respective procedures, which detail the commitment we have with our clients and the processes that define, document, monitor and manage the security of information. It is for this reason why there are areas at Evertec that because of the information and data managed, collaborators assigned to such areas will required to store their cellphones in lockers provided by Evertec or any other area identified for this purpose. Leaders managers of the areas protected by this rule will be responsible of communicating this instruction to their collaborators. The omission of complying with the instructions provided by management regarding this rule, will be sufficient basis to apply progressive discipline, including possible employment dismissal. lt is also vital our collaborators comply with the securities laws of the United States when they or develop confidential handle. acquire customer information.

Any fraudulent or improper use of this type of information is strictly prohibited. Any violation of these policies may be grounds for immediate termination of employment or any other appropriate disciplinary action.

customers, suppliers and business partners

suppliers and service providers

We acquire all goods, and services based on price, quality, availability, terms and services in order to make the best use of their assets and offer value to their customers and investors. As part of this effort, we have adopted a Code of Ethics for Suppliers and Service Providers following the same principles of our Code. It establishes the general standards of ethics and compliance that must be followed by Suppliers and Service Providers (collectively, "Service Providers" when the work is done, including: (1 the protection of tangible and intangible values, (2 avoid real and potential conflicts of interest, (3 fair treatment of competitors, (4 proper management of confidential i nformation o r i ntellectual property rights, (5 compliance with all laws, rules and applicable regulations, and (6 the reporting of unethical behavior.

The Service Providers must comply with our corporate policies and maintain the confidentiality of any relationship with our Company. Those Service Providers that participate in purchasing decisions must at all times ensure the best interests of Evertec®, act without undue influence and avoid real or perceived conflicts of interest, or the appearance of acting inappropriately.

Our model contract for Service Providers includes provisions related to the obligation of Service Providers to comply with our ethical principles. However, when using the contract provided by the Service Provider, every effort must be made to incorporate by reference the Code of Ethics for Suppliers and Service Providers. The reason for this is because any collaborator who contracts or negotiates with Service Providers on behalf of Evertec® must communicate to

them that they must comply with our ethical principles. The requirement to include the Code of Ethics for Suppliers and Service Providers as an integral part of the contract depends on the nature of the service. If you have doubts about its applicability, you should consult with Legal and Compliance.

fair treatment

As a Company, we have a history of success and enjoy a good reputation because we compete honestly and do not pursue competitive advantages through illegal or unethical business practices. We must fairly treat our customers, service providers, suppliers, competitors and collaborators, and we cannot take advantage of anyone through manipulation, concealment, insider trading, misrepresentation of material facts, or any unfair or unfair practice or illegal treatment.

To preserve our relationship with our customers, service providers and suppliers, you must:

- Clearly and accurately describe our services or products in any sale or promotional effort.
- Communicate clearly the terms of our business relationship, including agreements, contracts, schedules, prices, performance criteria and responsibilities.
- Promise our clients only those things that you understand that Evertec® can fulfill.

Unless preferential treatment is available on the same terms to people in similar situations within the same industry and in similar situations or positions, you should not receive preferential treatment from suppliers, service providers or customers without prior approval of the Executive VP of the business area and the Compliance and Ethics Officer.

job application

Evertec® values business relationships with its service providers. Therefore, you must be prudent and respect those business relationships when considering or applying for employment to others, whether or not that person is a temporary, permanent, part-time or full-time collaborator, and whether or not there is the possibility of a contract job. Our collaborators must honor any obligation and responsibility that they or others have with their respective employers, including not requesting other jobs in violation of the contractual obligations that the collaborator or Evertec® has.

legal and compliance issues

laws, regulations, and corporate policies

Our goal is to continue distinguishing ourselves as an ethical, secure and solid company, thus protecting the reputation of Evertec®, its collaborators, customers, shareholders and other investors. Evertec® and most of its clients are regulated by laws, rules and regulations of the financial industry. Therefore, we must know and adhere to the standards, rules and laws under which we operate. This is a critical aspect for our business. Violating the law or engaging in deceptive practices can damage our reputation in the market or affect the confidentiality of our clients, as well as result in the application of civil and / or criminal sanctions.

If you believe that you are in a situation where compliance with the Code and corporate policies results in violation of local law, you are required to immediately consult with Legal and Compliance.

anti-money laundering policy and against the financing of terrorism

As part of our ethical commitment, we support governments, international organizations and other members of the financial services industry in the effort to combat money laundering, terrorists and drug trafficking. Therefore, we effective money laundering require that programs that comply with applicable laws and that safeguard the Company from being used as a money laundering facility be implemented as part of our business. To fulfill this objective, you must comply with the policies, programs procedures adopted against money laundering. Remember that it is not worth overcoming any business opportunity that affects our commitment to combat money laundering. If you detect any unusual

activity or have any concern related to money laundering or terrorist financing, you must report it immediately through any of our established processes for ethical communications, www.evertecethicsline.com.

economic sanctions

You must comply with our Policies and Procedures to abide with the provisions of the Office of Foreign Assets Control ("OFAC" as well as with any related procedure applicable to a particular jurisdiction in which the Company does business. To comply with the OFAC Policies, we must not process financial or commercial transactions involving a country, person, business or government entity sanctioned by OFAC. Failure to comply with these policies and procedures constitutes a serious violation and may result in disciplinary action, up to and including termination of employment.

law of foreign corrupt practices

At Evertec®, we must comply with the Foreign Corrupt Practices Act, the Anti-Corruption Policy of Evertec® as well as with all anti-bribery and corruption laws applicable in the countries where we do business. In compliance with these policies

what is OFAC?

OFAC is the Office appointed to the Department of the Treasury of the United States that administers, and enforces economic sanctions programs against foreign countries, terrorists and those involved in activities that threaten national security and the foreign or economic policies of the United States.

and regulations, you cannot give, promise or offer anything of value to any client, government collaborator or any other person for the purpose of improperly influencing a decision, securing an advantage, avoiding a disadvantage situation or obtaining or retaining business. Performing this behavior exposes our company to civil and / or criminal liability and significant damage to its reputation, and undermines the trust of customers, investors and communities. Any similar behavior of an office or collaborator could result in termination of employment.

permitted business activities

We provide our clients only those products or services that are allowed under the U.S. Bank Holding Company Act and other applicable banking laws. In order to guarantee compliance with this provision, you must consult with Legal and Compliance in the case of acquisitions, proposals, and investments, or discuss any interest in the provision of new products or services.

work environment



fair labor practices

We believe in equality and impartiality among the individuals of our Company and we provide equality in all employment opportunities. Therefore, we must all comply with fair employment practices and nondiscrimination laws, as well as with affirmative action programs.

discrimination and harassment

Our Company values and respects the diversity among our collaborators and expects our workplace to be representative of this. Therefore, we do not tolerate discrimination, harassment, intimidation, whether for reasons of race, color, religion, sex, sexual orientation, gender identity, age, national origin, political affiliation or beliefs, social status, marital status, information. disability, genetic eligible veteran's condition or as a victim of domestic violence, or any other classification protected by law, committed by or against any colleague, candidate, customer, supplier or visitor.

relationship with colleagues

We strive to maintain a respectful and professional work environment. To maintain this ideal work you should avoid obscene

obscene or disrespectful behavior. Also avoid inappropriate language and jokes or comments, such as those of racial, sexual, political or religious content or in reference to a person's age, national origin or disability, or any other classification protected by law. Personal relationships between colleagues should not create a conflict with your duties and job performance.

In addition, in order to avoid any potential conflict of interest, if you are a family member of, or maintain a personal relationship with a colleague, the relationship should be notified to your leader and Ethics & Compliance Officer to determine how the situation should be handled.

substance abuse

We are committed in maintaining a work environment free of alcohol and illicit drugs therefore promoting a healthy and productive work environment. The misuse of controlled substances or selling, manufacturing, distributing, possessing, use or being under the influence of illegal drugs at work is prohibited.

We must all be familiar with and comply with the Substance Abuse Guide available in the Collaborator Handbook and with any other internal policy on this matter.

It is forbidden to use alcohol or drugs during work hours or while doing your work or driving a vehicle, machinery, tool or equipment of our Company. If you occupy a position which requires you to participate any activity related to sales and / or customers of the company, and you decide to consume alcoholic beverages, it is voluntarily and should be in moderation. Always keep in mind the rules contained in this Handbook and our corporate image.

You are part of our Company and our success. Therefore, when you participate in activities or meetings on behalf of Evertec®, you cannot compromise the performance of the company or corporate image, or risk your safety or the safety of others for excessive consumption of alcohol.

Except in those cases in which prior approval is obtained from People and Culture, the celebration of activities, whether in or around the Company's facilities, where alcohol is served, is prohibited. In the event that alcoholic beverages are authorized in any activity on or off Evertec® facilities, the consumption in any case is voluntary, should always be in moderation and never in a way that could affect our reputation, the reputation of Evertec® or compromise our ethical principles.

health and safety at work

We are committed to improving the welfare, health, and safety of our collaborators, customers, contractors and service providers. Health and safety are the reasons why we constantly strive to maintain a risk-free work environment. For this reason, it is important that you familiarize yourself with and comply with applicable laws and regulations regarding health and safety, as well as with internal regulations or policies related to your work area. Our commitment to health and safety at work is as follows:

- We are responsible for the identification and control of Occupational Safety and Health risks, ensuring the best working conditions.
- We are committed to complying with applicable regulations, laws and regulations associated with Occupational Safety and Health, to protect the health and physical integrity of our collaborators and visitors.
- We integrate Occupational Safety & Health practices as a business strategy for the

- continuous improvement of performance in this area.
- We promote awareness and education for occupational safety and health, applying training programs for our collaborators.
- We are committed to providing the conditions and environment of a suitable work environment, to prevent risks in the operations of the company.
- We will promote continuous improvement in occupational safety and health.

community

social responsibility

As part of our corporate culture of social responsibility, we encourage our collaborators to actively participate in organizations that promote the well-being of the communities where we are present. Therefore, philanthropic initiatives such as volunteering activities are generally supported by the Company. The community perceives our directors, officers, and collaborators as representatives of Evertec®. Your behavior outside of work can positively or negatively impact the image of our Company and the trust of our existing or potential customers. Therefore, it is part of our social responsibility to help our community.

environmental protection

We are committed to conducting our business in a way that protects the environment. Our commitment includes promoting those programs that promote environmental conservation, such as the Orange Revolution, alternative renewable energy and recycling. All of us who are part of Evertec® are in turn responsible for protecting the environment.





political activities, contributions, and lobbying

If you wish to participate in any political process, you have the right to do so but only on an individual basis, and not as a representative of the Company. However, you cannot work in any of these activities during work hours, because any open, visible and partisan political activity can lead someone to believe that your actions reflect the opinion or position of the Company. Furthermore, if you decide to make an economic contribution to a group or political candidate, you must comply with the laws and regulations applicable to political contributions. For example, if you have a friend who is applying for a political position and you want to help them with their campaign, you can do it if the support is personal and you do it without using the resources of the Company, including working hours, email, equipment, articles or the name of Evertec® to promote the campaign.

Before accepting a nomination to hold a position as a public official, in a public corporation or government agency, while you are collaborator, you must notify your nomination Executive VP of Legal Compliance, who will determine if there is a conflict of interest. If the determination is that there is no conflict, then the request will be submitted for authorization to Evertec® Board of **Directors** the committee of the Board of Directors designated by them. However, except on those cases where the law from Evertec subsidiaries is located at provides specific dispositions that conflict with what is establish in this handbook, you cannot occupy an elected position while you are employed by the Company.

The Company may hire public officials to perform services that have a legitimate business purpose and are not found in conflict with the duties of a public official, such as hiring a police officer outside working hours to provide security at an event. Any hiring decision must be previously authorized by People and Culture and by Legal and Compliance.

charitable contributions

Petitions or requests for donations or charitable contributions must be referred to Product, Marketing and Communication Innovation. Under no circumstances can you use Evertec® funds or resources to make a contribution or donation on behalf of the Company.

conclusion

Annually, the directors. officers, and collaborators of Evertec® must read the Code and certify that they have read, understood and will comply with it. This Code replaces any previous version. We trust that you will be an integral part of our ethical growth. With vour help and cooperation, we can avoid unethical behavior and promote environment of respect and integrity at all times.

contact information

Legal and Compliance Executive VP

787.759.9999 ext. 4807

Compliance and Ethics Officer

787.759.9999 ext. 4808

Evertec®

compliance@Evertecinc.com

or ethicsofficer@Evertecinc.com

People and Culture

787.759.9999 ext. 3244

Ethics Line

www.evertecethicsline.com

relevant documents

Amended and Restated Related Party Transaction Policy

Evertec® Intranet / Policies and Procedures / Approval and Corporate Authorizations

Anti-Corruption Policy

Evertec®Intranet / Policies and Procedures / Anticorruption, Export Management and OFAC

Code of Ethics for Suppliers and Service Providers

Evertec® Website (www.Evertecinc.com / Relations with Investors / Corporate Information / Governance Documents Evertec® Intranet / Policies and Procedures / Code of Ethics

Conflict of Interest Declaration Guidelines

Evertec® Intranet / Policies and Procedures / Code of Ethics

Statement of Possible Conflicts of Interest (Collaborator Acknowledgment for Possible Conflicts of Interest)

Disclosure Policy

Evertec® Intranet / Policies and Procedures / S.E.C.

Document Retention Policy

Evertec® Intranet / Policies and Procedures / Retention of Documents

Collaborator Handbook

Conduct and Performance Guidelines (Puerto Rico and Compensation and Benefits Guide for Puerto Rico

Guidelines for Participation in Social Media

Evertec® Intranet / Policies and Procedures / Communications and Marketing

Information Security Policy

Evertec® Intranet / Policies and Procedures / Privacy and Information Security

Policy and Procedures - Securities Traffic with Non-Public Material Information (Insider Trading) Policy and Operational Instructions - OFAC

Office of Foreign Assets Control Evertec® Intranet / Policies and Procedures / Anticorruption, Export Management and OFAC

Privacy Policy

Evertec® Intranet / Policies and Procedures / Privacy and Information Security

protected informant

what is a protected informant?

A protected informant refers to any individual who reports illegal or unethical behavior that occurs in their workplace. This complaint can help the company prevent or stop a breach of a law, or a violation of a procedure or regulation, health and safety regulations, or any of the corporate policies.

purpose of our policy of protection of the informant

Our Informant Protection Policy was created to protect any individual in our Company against retaliation or discrimination against them for reporting or wishing to report illegal or unethical behavior, as well as any wrong or unfair act that occurs in the Company. Collaborators should not fear suffering negative consequences for reporting situations related to unethical behavior, as long as they report them in good faith. Evertec® does not tolerate discrimination or retaliation against a protected informant that reported or alerted the company of any inappropriate, legal or unethical conduct. However, we need your help to be able to prevent those types of unethical situations.

report unethical situations

We want all of our collaborators to feel comfortable communicating and reporting unethical situations that occur in Evertec®. This is why we have designed a special procedure to inform, receive, retain and treat such situations in a confidential, and anonymous manner, provided they are related to some of the following areas:

- Accounting
- Audit
- Fund management
- · Collaborator related issues
- Violations of compliance or ethics
- · Suspicious, fraudulent or illegal acts

To report confidentially and anonymously, visit our Evertec® Ethics Line at www.evertecethicsline.com. If you have a complaint or concern related to any of the aforementioned areas, or any other unethical or illegal matter, you can follow the disclosure procedure established in our Code of Ethics.

We encourage you to report any situation that you think violates our ethical standards or that seems



illegal to any of our communication channels. This way we can:

- · Guarantee the satisfaction of our customers
- Achieve the expected results
- · Establish a positive work environment
- Save time
- · Develop good relationships with our co-workers
- · Take care of our resources
- Protect the reputation of Evertec®
- Promote an atmosphere of confidentiality and honesty
- · Improve the efficiency of our businesses

conclusion

Each of our collaborators represents Evertec®. Therefore, if you have reason to believe that within Evertec® a violation of a law, rule, regulation, or policy is taking place; an abuse of authority, a possible threat or danger to public safety, or a clear disregard for the funds and resources of the Company, it is your responsibility to inform in a timely manner through the Evertec® Ethics Line or other communication channel.

Evertec® prohibits all types of retaliation and discrimination against directors, officers and collaborators who report such actions in good faith. Help us to prevent unethical or illegal practices that harm our work environment.

For more information regarding our different communication channels, please consult our Code of Ethics. And remember, maintaining an ethical workplace depends on all of us.

conflict of interest

A conflict of interest occurs when the personal interests of an individual influence their impartiality or interfere or appear to interfere with the interests of Evertec®. Collaborators who have questions about whether or not a conduct represents a conflict of interest should contact the Ethics Officer or People and Culture of Evertec®, Also, the collaborator can send an email to ethicsofficer@ evertecinc.com. In the communication, the collaborator must include a brief description of the situation that they want to be evaluated, the position they hold in Evertec® and a breakdown of their duties and responsibilities. The Ethics Officer and / or People and Culture of Evertec® will analyze the situation presented to determine whether or not there is a conflict of interest, in accordance with the Guidelines for Declaring Conflict of Interest.

to avoid conflict of interest

- No officer or collaborator will participate in business with clients or suppliers that they directly or indirectly work with as part of their responsibilities, except those of a civic or non-profit nature. Any exception to this must have the prior approval of the Ethics Officer or People and Culture.
- No officer or collaborator may intervene or influence any business or transaction with Evertec® in which their interests are involved, those of their family, relatives or the businesses or organizations in which they have an interest or participation. In addition, no collaborator may participate in the hiring of a relative, either as a supplier, collaborator, contractor, etc. Neither may intervene in matters related to orders that are made for goods or services related to such hiring or in evaluating compliance with the contract.

- · Both the hiring of relatives and people with whom a romantic relationship is carried out, as well as their transactions or business, must be handled by an office where the collaborator does not work and which the latter does not directly or indirectly supervise. Hiring family members to work in the same office is prohibited. In addition, if at any time it is not possible to refer a transaction or business from a family member to another office or unit, the collaborator will refrain from participating and will refer the matter to another collaborator of hierarchy. On the other hand. whoever is attending to the contract, business or transaction, will not give preferential treatment to the collaborator, relative, close friend, business or organization in which the collaborator has interest or participation, and will evaluate the situation exclusively on merits. They must ensure that the relationship does not interfere or seems to interfere with the ability to act in the best interest of Evertec®.
- Counseling to clients will always be offered within the framework of responsibility, authority and expertise of the collaborator.
- Evertec® encourages the participation of its collaborators in organizations that promote the welfare of the community. However, before accepting a position on the board of directors or other position in organizations with profit or not for profit, even when said position does not involve remuneration, the collaborator will ensure that this does not cause a conflict with the best interests of Evertec® or affect its image in the community. Therefore, they must immediately inform the Ethics Officer or the Executive VP of Legal and Compliance of their intention to occupy a position of such nature and comply

with the requirement of Evertec® to occupy a management position on a Board. In addition, the collaborator will not solicit donations or assistance for such organization or other clients or Evertec® suppliers, except with written authorization from the Ethics Officer. In those civic campaigns that Evertec® promotes, special instructions will be issued and the persons in charge will be identified. Any particular situation related to the acceptance of quotas or remuneration must be governed in accordance with the provisions of the Guidelines for the Declaration of Conflict of Interest.

- No collaborator is authorized to contribute on behalf of Evertec®, money, securities, use of property or the provision of Evertec® collaborators for the benefit of a party, organization or political candidacy. The collaborators, however, are free to exercise their right to vote, and contribute in their personal character to their party, candidate or political organization of their preference, outside working hours.
- When we interact with federal or local government agencies as Evertec® clients, we must apply the same excellence in service, integrity and equity that is employed with other Evertec® clients.
- In relations with suppliers, there will be no favoritism. Purchases from suppliers and the terms of the service contracts will be based on merit and always safeguard the best interests of Evertec®.
- No collaborator may, directly or indirectly, request or borrow money from a colleague, supplier, customer or potential client, except for a request for credit or formal financing as a client of a financial institution.
- It is likely that in the course of their employment, the collaborator will come in contact with information and products that are the exclusive

- property of Evertec®, including, without being understood as a limitation, information about our clients (hereinafter, the confidential material. All confidential material, including the aforementioned, and any other material that Evertec® determines from time to time that the collaborator obtains or uses in the exercise of its functions or as a result thereof, will be confidential and is and will be the exclusive property of Evertec®, even when the collaborator ceases their functions in the company. The confidential material cannot be used for any purpose other than in relation to its use and for the benefit of the client, nor may it be disclosed without the express written authorization of the Executive VP to which the collaborator is assigned.
- No collaborator will bribe or offer favors to a person or organization to obtain business for Evertec®, or for any other reason. This practice will also govern our relationship with collaborators of other financial institutions.
- No collaborator will accept or request favors, benefits or assets, including commissions, for business or transactions from a client, potential client or Evertec® supplier. No collaborator shall receive compensation, benefit or any other from a client or from third parties because of the functions performed for Evertec®, except as provided in the Conflict of Interest Declaration Guide and with the prior approval of the Evertec® Ethics Officer.
- Any official or collaborator will notify the Ethics
 Officer or People and Culture, by means of the
 declaration of conflict of interest, of any
 designation of executor, trustee or
 legal representative, in their personal character,
 even in relation to assets or persons of their
 family. It will be understood that the collaborator
 has an affiliation representative of a possible
 conflict of interest when: they have a position

- as officer, executive VP, executor, trustee, partner (general or limited), owner, collaborator, agent in an organization, business or unrelated officer to Evertec®.
- · When an collaborator wishes to have their own business or additional employment to the one they have at Evertec®, they must request prior approval from the Ethics Officer or from People and Culture. This additional employment or own business may not cause a conflict of interest with the Evertec® businesses, their duties and responsibilities as a collaborator in Evertec®, or diminish their capacity, and efficiency. At all times, the employee's priority will be their work at Evertec®. Remember that the management of your own business or additional employment cannot interfere with our tasks and responsibilities within business hours at Evertec®. When the circumstances in the additional employment or own business point towards a possible conflict, the officer or collaborator is responsible for reporting this event to the Ethics Officer prior to the acceptance of the additional employment or the establishment of the business in the declaration of conflict of interest.
- No collaborator will accept, directly or indirectly, goods, gifts or personal benefits of value, or that is not a common practice of the client, potential client or supplier. If an collaborator receives something of that nature, they should report it immediately to the Ethics Office or People and Culture.
- As a general rule, collaborators or officers are not authorized to accept gifts, meals, entertainment or any gift that may interfere, compromise or give the appearance of committing Evertec®. In the absence of a situation indicating a possible conflict of interest, the following services will not be considered as personal benefits derived from customers:

- Gifts, gratuities, entertainment or favors for reasons of family ties or relationships whether of spouses, children or parents of the collaborator, as long as it is clearly established that such offering arises from the family relationship and not as a result of doing business with Evertec®.
- Some traditional courtesy in business, such as lunches, dinners, golf games and others, as long as they are not frequent.
- Gifts that are not in money or securities, provided that their value does not exceed \$150 for regular collaborators and \$500 for officers, executives and that are due to a special holiday, such as Christmas, nuptials, among others, as long as they are not frequent. Collaborators holding any license issued by FINRA must declare any gift exceeding \$100.
- In the event that the customer or potential customer or supplier is a government entity or office in or outside the United States or Puerto Rico, the officer or collaborator shall be bound by the provisions of applicable laws and regulations, including but not limited to the Foreign Corrupt Practices Act (FCPA).
- If not accepting a gift could affect Evertec®'s relationship with the client, the gift or its equivalent in money will be donated to charity. The collaborator must declare the acceptance of the gift in the Declaration of Possible Conflicts of Interest.
- Allowances, fees or other compensation received by the collaborator for performing any work outside of Evertec®, as long as this work has been previously approved as disclosed in the Guidelines to Declare Conflict of Interest.
- If a client, potential client or supplier sells goods or services to a collaborator, they will not accept discounts on the price if they are not available to the public or to all collaborators of the company for which they work.
- If a collaborator identifies a situation that appears to be a pattern of gifts in a particular unit, they should immediately notify the Ethics Officer or Legal and Compliance.

privacy

Evertec® will not disclose any non-public personal information (such as name, address, age, social security, date of entry, telephone numbers, date of birth and marital status about its clients, clients of its clients or others, including employment applicants, to third parties, without an official business purpose as specified in this guide. Third parties are companies outside Evertec®, such as insurance companies, charities, and financial institutions, among others.

Evertec® may share the aforementioned personal information, as permitted by law, among its companies, in order to design and provide the client with higher quality products. Evertec® and its subsidiaries allow access to information only for those collaborators who need it to provide services and products, or those who need access to comply with federal and local regulations of the financial industry.

Our collaborators have the responsibility of complying with our Privacy Policy and its principles, and we take the appropriate disciplinary measures to impose the responsibilities of our collaborators, as specified in our Code of Ethics and Standards of Conduct, which express that deviation from these guidelines may involve disciplinary measures, including termination of employment.

declaration of possible conflicts of interest

We must complete and keep the Declaration of Possible Conflicts of Interest updated at all times. In this document we must declare affiliations, additional jobs, family, and sentimental relationships, own businesses, additional income, receipt of gifts, and any other relationship that does not comply with the parameters detailed in this handbook.

conflict management

Our organization is characterized for valuing its

collaborators as one of its most important assets. Therefore, when conflicts arise, we want them to be dealt with promptness and professionally. The purpose of this section is to guide collaborators and leaders on the internal procedure for the management of conflicts that arise in the work areas.

Procedure to file an internal claim

- Evertec® promotes open and direct communication between collaborator and leader. For this reason, if a collaborator feels dissatisfied with a situation or wishes to file an internal claim, they should do so directly with their immediate leader.
- If the collaborator is not satisfied with the action taken by their leader, or if the situation directly involves their leader, they should contact the manager of their unit.
- If the collaborator feels that the claim is not addressed or is not satisfied with the action taken by the unit manager, they should channel it through their Executive VP.
- If the collaborator feels that the claim is not addressed or is not satisfied with the action taken by the Executive VP, they must channel it through People and Culture.
- Collaborators must use the described mechanism to file internal claims. If these alternatives are not viable for some valid reason, the collaborator may resort to report their claim through the ethical line at the following electronic address: http:// www.evertecethicsline.com.
- If the collaborator is interested in filing a harassment complaint, any type of discrimination, fraudulent activity or mismanagement of funds granted by the federal government, they must do so directly with People and Culture, the Ethics Officer and the Executive VP of Legal and Compliance.
- Evertec® will not retaliate against any collaborator who files a good faith claim before any internal or external troubleshooting forum, or against collaborators who serve as witnesses to such claim.

Procedure for Conflict Management

- Identify the situation and persons involved, collect and analyze the information obtained, identify the faults and the seriousness thereof, and refer to the documents contained in this handbook and operational procedures. If necessary, leaders should request advice from the People and Culture Manager of their country.
- Meet with the collaborators involved to explain how the situation affects their performance or that of others, as well as the good and normal functioning of an Evertec® unit. Explain the corrective or disciplinary actions that will be taken, exhort those involved to correct their behavior and explain the possible consequences of not doing so.
- If the situation merits disciplinary action, the leader must: share it with the People and Culture Manager of the country where the collaborator works, then deliver it and discuss it with the collaborator, obtaining the acknowledgment of receipt. All disciplinary action must be recorded in the system.
- Follow up on the employee's performance after applying the disciplinary action. If the behavior does not improve, the disciplinary process should continue progressively. The leader should consult with People and Culture if the disciplinary action to be taken requires termination of employment.
- When the situation cannot be resolved in the unit, the leader must refer it to the next level of supervision or to People and Culture. Claims related to discrimination or harassment will be referred immediately to People and Culture. In these cases, no leader or manager has the authority to conduct investigations on their own.

Responsibilities of People and Culture in Conflict Management

 Advise leaders in the administration of Evertec® rules, policies and procedures,

- compliance with laws and regulations related to employment and in the effective handling of investigations.
- Carry out an objective, sensitive and fair investigation process, maintaining confidentiality in appropriate cases, of internal complaints related to discrimination, harassment or any other claim.
- Keep the claimant collaborator informed of the progress of the investigation and the overall results of the investigation.
- Document the relevant findings of the investigation and recommend the actions to be taken based on the data collected.
- Communicate, analyze and / or apply corrective actions and findings to the claimant and the alleged harasser.
- Discipline any collaborator or witness who provides false information during the filing or investigation of a complaint. This could include termination of employment.

labor relations

standards of conduct

Evertec® has established a series of rules that promote a safe and effective work environment to ensure equity and consistency in the management of internal practices. This way, we guarantee an excellent service to all our customers.

These rules define the Standards of Conduct, which provide a guide to the behavior expected of all Evertec® collaborators. In addition to a series of basic standards, several examples of what could constitute violations of these standards have been included. These examples are provided only illustratively and in no way constitute all possible scenarios of infractions of these standards.

The disciplinary actions to be applied in each case should be consulted with the People and Culture Manager of the corresponding country, to ensure the correct application of the legal provisions that apply where we have operations.

Evertec® may take the disciplinary action it deems necessary depending on the severity of the employee's conduct, or the facts of the particular case before its consideration, which verbal reprimands, include reprimands, or suspension or termination of employment. It is important to mention that a written disciplinary measure does entail necessarily granting particular а document or format entitled "Warning" and / or "Disciplinary Measure". As an example, an email sent by a leader in which the collaborator is notified of deficiencies in their work and / or violations of the Evertec® rules and policies constitute a written disciplinary measure without requiring a specific language.These rules do not include, encompass and / or include all situations that

could negatively affect the good and normal functioning of Evertec®, so that when a fault is committed that is not contained in this handbook, corrective measures will be applied in accordance with the severity of the case. There are particular cases of collaborators who, because of the importance repercussions of the functions they perform, the application of these norms or the progressive discipline to be applied may vary, either by virtue of the provisions of their employment contracts and / or by the Importance of the role within Evertec®. When the application of a standard is in conflict with the employment contract of the collaborator, Evertec® will be governed by the provisions of the employment contract of the person in question.

The history of violations of Evertec® rules and / or disciplinary actions may be used to impose disciplinary sanctions that could lead to dismissal, regardless of the date when the collaborator incurred the aforementioned violation and / or if said violations are not related.

These rules do not limit Evertec's faculty of ending any employment agreement at any moment and without previous notice, or to modify, eliminate or change a disciplinary procedure established in this handbook given the circumstances. If ambiguity results from the dispositions of any policy or rule established by Evertec, the Company will reserve its right to interpret those rules and policies.

standard

1. Be present performing duties in the workplace according to the assigned schedule. Record daily attendance correctly.

examples of deviations from the standard

- a. Absences, tardiness or early dismissals, whether excused or not, having a certain pattern of absences, such as before or after a holiday, certain days a week or certain periods during the year.
- b. Not informing the leader, before starting the shift, of any absence or delay.
- c. Being absent for three consecutive days without communication or authorization from the leader.
- d. Leaving the work area without giving prior notice to the immediate leader
- e. Not registering daily attendance correctly using the mechanism provided by Evertec®.
- f. Recording the attendance of another collaborator or allowing another collaborator to do it for you.
- g. Incurring overtime or accessing systems outside working hours without prior authorization.
- h. Refusal to work overtime without just cause, provided it is reasonable and necessary for Evertec®.
- i. Sleeping or performing other activities unrelated to work in the workplace. This includes the use of personal cell phones and prolonged outings to the smoking area, among other non-tolerated behaviors.
- j. Not providing a medical excuse, when being absent from work alleging a health issue, according to the requisites established at each of Evertec's subsidiaries.
- 2. Work efficiently, according to the quality standards and instructions given by the immediate superior. Demonstrate interest, and a sense of responsibility in the performance of work.
- a. Not performing the functions with the greatest interest, agility, promptness, responsibility or efficiency.
- b. Not following the verbal or written instructions given by the superior.
- c. Demonstrating poor performance.
- d. Not cooperating fully in any intervention or investigation authorized by the levels of supervision indicated, People and Culture and / or carried out by external auditors, government researchers or regulators.
- e. Deviations from Evertec® procedures.

standard

3. Observe correct behavior, respect, and courtesy towards customers, suppliers, colleagues or any other person. Avoid obscene language or jokes, disrespectful or improper comments whose nature or content is sexual, racial, political, religious, age-related, national origin (Nationality), color, social status, marriage, sexual preference, gender identity, genetic information, eligible veteran, disability or any other classification protected by law.

examples of deviations from the standard

- a. Encouraging or advising another collaborator to insubordinate or disobey instructions given by the leader, not performing their tasks or duties, or not complying with operational instructions, among others.
- b. Engaging in violent, disorderly conduct, malicious gossip, hand games, use of abusive, threatening, provocative or obscene language against a co-worker, leader, supplier or any other person, among others.
- c. Disrespecting or not observing correct conduct towards the leader, co-workers, customers, suppliers or any other person, among others.
- d. Engaging in threatening acts, fights, skirmishes, indecent or obscene acts, aggression, or provocation for any reason in the vicinity of Evertec® or outside of it, if the situation arises for reasons related to employment, among others.
- 4. Strict confidentiality of all non-public Evertec® matters will be maintained. This includes information related to customers, products, business creations, private collaborator information, among others.
- a. Disclosing or offering official or confidential non-public information to clients, collaborators or persons outside of Evertec®, without being duly authorized.
- b. Using the information systems for personal purposes or sharing content with other collaborators or people outside of Evertec®. This includes the use of personal passwords other than those assigned to you.

- 5. Comply with Evertec® safety rules and ensuring compliance with them.
- a. Not observing applicable safety and health rules. Contributing, through action or omission, towards creating a dangerous situation or that threatens the health and safety of another collaborator. Not using safety equipment, including shoes or "Bluetooth" while driving. Evertec® is a text-free zone. Collaborators who drive official or private vehicles while on official business will not be able to send text messages while driving. In addition, collaborators may not refuse to perform required tests such as audio metrics and /or any other required by the corporation to perform the essential functions of their position, as part of their Health and Safety Program.

standard examples of deviations from the standard b. Smoking outside designated areas or non-authorized areas of Evertec®. c. Failure to comply with the internal safety rules of Evertec®. Failure to comply with the rules of transit and parking of vehicles, while they are on official company business. d. Failure to comply with control access rules including, but not limited to, having a good and visible identification card, and making good use of it. e. Allowing non-collaborators, children, or persons not authorized by Evertec®, to remain in the work areas, including family members, without the express authorization of your immediate leader. 6. Present an appearance that reflects the a. Not caring for personal appearance, or dressing professional image that is expected of all Evertec® improperly according to the Personal Appearance and Dress Code. collaborators. a. Carrying, using or storing weapons or other 7. Do not carry, use or store weapons or other objects at Evertec® without proper authorization that objects, without the proper authorization of represent a danger to safety or human life. Evertec®, during or after working hours. b. Arrest and conviction for possessing, distributing, transporting or selling controlled substances. In the case of arrest, and conviction for cases that could affect and / or adversely impact the work environment, welfare and / or safety of the company, the collaborator may be suspended from employment until the legal process ends. a. Using, possessing, selling, administering or 8. The use, distribution, possession, transport or transporting controlled substances without a medical selling of controlled substances (except use of personal medical prescription) is not allowed. prescription. a. Attending work under the influence of alcoholic beverages 9. Attending work under the influence of alcoholic beverages is not allowed. and / or controlled substances. b. Selling, possessing or ingesting alcoholic beverages and / or controlled substances during working hours or in official activities, without prior authorization from People and Culture. c.The ingestion, possession or sale of alcoholic beverages at Evertec® facilities is not permitted, except with prior authorization from People and Culture.

standard

10. Placing or distributing notices or printed material, except with prior authorization from People and Culture.

examples of deviations from the standard

- a. Requesting funds for any purpose, without the proper authorization of People and Culture.
- b. Distributing or placing notices or printed material, or administering surveys / questionnaires, without the due authorization of People and Culture.
- 11. Ensure that any activity carried out, including the provision of services inside and outside of Evertec®, does not cause a conflict of interest, in accordance with the code of ethics.
- a. Having affiliations, business or working jobs that create a conflict with their work or with the interests of Evertec®, or carrying out activities against Evertec®.
- b. Receiving or procuring commissions or other unauthorized compensation, in relation to any Evertec® transaction or business. Requesting or accepting goods, gifts, concessions or rewards from customers, suppliers or related, when they are done in an exaggerated manner.
- c. Requesting or borrowing money from customers, suppliers or collaborators.
- d. Carrying out your own business during work hours.
- e. Making statements that can reasonably be considered false, malicious, intimidating or harmful to Evertec®, clients or collaborators, knowing their falsehood.
- f. Obtaining personal benefits from the relationship with customers and suppliers.
- g. Carrying out activities that identify Evertec®, without the proper authorization, with candidates or political parties; placing propaganda of political parties in the work areas.
- h. Performing or promoting social, recreational, political, religious, civic or sports activities within Evertec®, without the due authorization of People and Culture.

standard

12. Perform with integrity and honesty. Avoid committing fraud, embezzlement or other public crime, or attempt to do so against Evertec®, customers, suppliers, collaborators, family members or any other entity.

examples of deviations from the standard

- a. Using Evertec® accounts, with or without intention, to obtain personal benefit through the management of deposits, withdrawals, payments or reimbursements.
- b. Committing fraud or attempting to commit fraud, embezzlement or other crime against any collaborator, customer, related party, supplier, family member or any other person.
- c. Requesting and profiting from reimbursements that are not official or authorized. The fact that a refund has been approved by a leader does not exempt the collaborator from compliance with this standard, if after an investigation it is determined that the request for reimbursement was unreasonable and / or violates or gives the appearance of violating federal or state statutes.
- d. Falsify, alter, omit or give incorrect information either verbally or in writing, with or without intention, in relation to any form, or document provided by Evertec®, customer transactions or other information required by Evertec®. This includes, but is not limited to, agreements, proposals, those reports related to medical claims and vouchers, licenses, medical plan, disability, job application and other official documents owned by Evertec®, among others.
- e. Accessing customer bank accounts without authorization.
- 13. Protecting and caring for Evertec® property. Use property only for designated and authorized purposes.
- a. Not keeping the work area clean and orderly. Not taking care of the work equipment, namely computer, laptop, cell phones and any other equipment designated for work, or personal equipment whose use is designated or authorized for employment functions, among others.
- b. Using Evertec® equipment outside the facilities without the proper authorization of the immediate leader.
- c. Negligent use or disposal of documents, portable equipment, or any other tool that contains confidential information property of Evertec related to the use of suppliers, customers, collaborators or businesses, among others. This includes motor vehicles and any other machinery.

examples of deviations from the standard standard d. Use of equipment, work tools, motor vehicles, or other property of Evertec for personal purposes or a different one than what it was intended for or authorized. e. Negligent driving of a company vehicle and not following transit laws and / or internal regulations of Evertec, including always having a valid driver's license, among others. 14. Supervision staff will ensure that in the event a. Not notifying People and Culture of the of termination of employment the entire process is termination of an collaborator on or before their completed on time. termination date and / or not terminating employee's physical and systems access on or before their last day of work. a. Failure to comply with any policy, law, procedure, 15. Being faithful to the letter, spirit, and legislative intention of each of the laws and regulations that regulation or order of the federal or state government, apply to Evertec® and each collaborator. its courts, agencies including, but not limited to, the conviction for any felony or less serious offense, either by a prearranged plea of guilty or allegation of nolo contendere (did not refute the charges). 16. Not incurring in any other conduct that may a. Incurring in any action that affects the good and have the effect of interrupting the good and normal normal functioning of Evertec®, even if it is not functioning of Evertec®, even when said conduct is specifically contemplated in this Handbook as a not specifically contemplated in this Handbook as a deviation. deviation.

applications for flexibility in employment

Evertec® always aims to be at the forefront of the needs, demands, and realities of the world of work. For these reasons, we will do everything possible to try to grant our collaborators' requests for flexibility in employment, provided that the business operation needs allow it and the requirements detailed in this policy and the applicable legislation are met, and the country where you work allows it.

Collaborators who work regularly thirty (30 hours or more a week and who have been working for at least one (1 year at Evertec® may request changes in the schedule, modification in the number of hours worked and / or modification of the place where they do their work. Any request of this kind must be recorded in writing, detailing the requested change, and the reason for the request, the effective date and the duration of the requested change. These requests will be presented and processed through People and Culture who will evaluate the requests according to the labor laws of each country where the office is located..

Evertec® will evaluate the employee's request and notify them if it was accepted or denied. When the needs of the unit allow it, the request will be granted subject to the conditions and requirements that the Company deems appropriate. Evertec® will manage with priority requests for flexibility in employment made by heads of family who have custody or sole custody of under-age children.

equality of opportunity in employment

Evertec® offers equal opportunity in employment not and does discriminate against any collaborator for employment because or applicant of race, color, religion, affiliation political ideology, age, sex, sexual orientation, gender identity, national origin, social status, marriage , disability, as eligible veteran and veteran condition with disability, for being a victim or being perceived as victim of domestic а violence (including stalking and sexual assault), genetic information of

the person and / or their family members or being perceived as such, for making inquiries, claims or disclosures under the Pay Transparency Act or any other characteristic protected by law.

We avoid any employment practice that conflicts with this anti-discrimination policy. Evertec® provides equal opportunities in employment including: hiring, promotions, demotions, transfers, evaluations, selection for training, dismissals, salaries, and other means of compensation, among others.

It is the responsibility of all managers and leaders to make decisions in accordance with Evertec® declaration of Equal Opportunity in Employment. In accordance with the foregoing, Evertec® will not discriminate salary for reasons of gender against collaborators who perform comparable work that have equal functions, requires equal skill, effort and responsibilities under similar work conditions. unless said difference is due to: i a bona fide system that rewards seniority or merit in employment; ii a compensation system based on the quantity or quality of production, sales or profits; iii for education, training or experience; or iv any other reasonable factor that is not the sex of the person.

If an collaborator considers that the Equal Opportunity in Employment Guide has not been complied with, they should contact the People and Culture Manager of the country where they work.

policy on equality of opportunity in employment

Evertec® is an Employer that offers Equal Opportunity in Employment and does not discriminate against any collaborator or applicant for employment because of race, color, religion, affiliation or political ideology, age, sex, national origin, social status, marriage, disability, genetic information, sexual orientation and gender identity, status as an eligible veteran or veteran

with disability, for being a victim of domestic violence, or being perceived as such, or any other characteristic protected by applicable legislation. Employment decisions, including decisions related to compensation, salary and collaborator benefits, are made solely on the basis of work-related criteria and in accordance with local and federal laws prohibiting discrimination in employment.

Evertec® takes affirmative action to ensure that job seekers and their collaborators enjoy equal opportunity in employment without taking into consideration the conditions and categories mentioned above. Evertec®, affirmative specifically takes action in the following areas: promotions. employment. demotions. transfers. selection for training, for recruitment, dismissals, announcements salaries and other means of compensation, among others, to ensure that there is no discrimination for the reasons listed mentioned above.

Collaborators and job applicants will not be subject to persecution, intimidation, threats, coercion, discrimination or retaliation for exercising any right protected by any applicable law.

If you consider that our policy has not been complied with, or you wish to submit a claim for unequal treatment, you should contact the People and Culture Manager the country where you work. You can also report any deviation to this policy confidentially the Evertec® ethics line. www.evertecethicsline.com.

work environment

Evertec® is pleased to maintain a safe and respectful work environment. Our rules and procedures are fair and equitable, which is why Evertec® promotes an open-door policy where the direct opinion of its collaborators is valued, without intermediaries or third parties. Evertec® is committed to offer continuous programs and benefits that are of great help to collaborators and their families. Likewise,

Evertec provides a fair and reasonable compensation compared to the market and its competitors.

Evertec® has developed procedures to make its collaborators feel comfortable, exposing any type of situation to their immediate leader or a representative of People and Culture. The best way to solve situations is direct verbal communication. Any Evertec® collaborator can take any suggestions that benefit the business, he\she and their colleagues to their leader. Managers, leaders, and other staff are committed to doing what is right and fair at all times.

discrimination in employment

It is Evertec's® policy to maintain a positive and fair work environment for all its collaborators. Maintaining that environment includes ensuring a work climate free of all types of discrimination based on sex, race, sexual orientation, gender identity, color, religion, age, ethnic or national origin, origin or social condition, disability, genetic information or other classification protected by law.

Evertec® will not tolerate verbal, non-verbal or physical conduct on the part of any collaborator that discriminates, disrupts or interferes with the work of another or that develops an intimidating, offensive or hostile work environment.

collaborator Anv who has а complaint discrimination of by any person, including managers, leaders. COworkers, clients visitors. shall and / or have the obligation and duty notify to People and Culture writing immediately in or ethics line, www.evertecethicsline.com.

People and Culture will promptly investigate adequately any discrimination complaint and, depending on the outcome of the complaint, will take the corresponding corrective actions. All information in this regard will be kept as confidential as possible.

sexual harassment in employment

Evertec® strictly prohibits sexual harassment in employment. Sexual harassment is legally defined as or undesired sexual advances, requests for sexual favors unwelcomed or undesired, and / or any other physical or verbal conduct of sexual nature, irrespective of gender, when:

- Submission to such conduct becomes implicitly or explicitly a term or condition of the employment.
- The submission or rejection of this behavior is used as a basis to make decisions that affect the collaborator in their employment, such as promotions, salary increases, layoffs, etc.
- Such conduct has the purpose or effect of unreasonably interfering with the employee's performance at work or creating a hostile, intimidating or offensive work environment.

Behavior that can become sexual harassment can manifest itself in different ways, including but not limited to the following examples:

- Verbal: Sexual innuendos, suggestive sexbased comments, distasteful jokes based on sex or other specific traits of sexual content, sexual proposals, insults or threats with sexual suggestion, messages with sexual content.
- Nonverbal: Glances suggestive or insulting, sounds, gestures, drawings or calendars suggestive or insulting with sexual suggestion, written materials that are offensive or demeaning with sexual suggestion.
- Physical: Touching the body intentionally (for example, rubbing, patting, pinching), kissing, inappropriate exposure of private body parts, or forced acts of a sexual nature.

Communication Media or the Internet

Evertec® prohibits communication, conduct or expressions that flow through telecommunication means or work tools that use computerized media and other related means that can cause

a hostile work environment for a person or persons related to the company.

Guidelines or the Presentation o Internal Claims

Any collaborator who has a claim shall have the obligation and duty to immediately notify their immediate leader, Executive VP or a representative of People and Culture in writing. Any notification or claim received on any type of discriminatory treatment, or harassment for the reasons mentioned above or to receive equal pay for equal work, will be subject to an impartial investigation, which will be carried out promptly and diligently. Whenever possible, the investigation procedure will be confidential and only sensitive information related to the investigation will be communicated and disclosed to the parties directly concerned. If it is determined that a leader or collaborator has engaged in some type of discrimination or harassment, corrective action and appropriate disciplinary action will be taken, which may include termination of the harasser.

If a collaborator files a malicious or false claim, he or she may be subject to disciplinary action, which may include termination of employment. If the acts of discrimination or harassment come from third parties (clients, consultants, suppliers or visitors, Evertec® will take corrective measures that are reasonably available.

prohibition of reprisals

Evertec® prohibits the retaliation against collaborators who participate in any activity protected by law for the simple act of participating in it. If any collaborator understands that they are a victim of retaliation, they must immediately notify a People and Culture representative or manager of their group in writing.

Any person who in any way retaliates against a collaborator for having submitted a claim or participated in the investigation of a discrimination or harassment complaint will be subject to disciplinary action, which may include termination of employment.

use of social media

As a result of the growing popularity of new communication tools, the way in which people communicate internally and externally is constantly evolving. Although these tools offer many opportunities for communication and collaboration, they bring new challenges and responsibilities for all.



This section applies to collaborators or officers of Evertec® who use multimedia or social networks. Social media includes the different tools available to communicate and share text messages, voice messages, videos, images or photos, and / or any electronic information method, including the venues that the collaborator or official uses to portals, communicate such as blogs, wikis, podcasts, forums, content communities, microblogs or any other form of social media (publications on the Internet or social media), either as part Evertec® functions or during their free time, and regardless of whether they use or not Evertec® equipment or assets.

Collaborators should be aware that they are personally responsible for the content they post on the Internet. You must keep in mind that any text file, photos, audio, and video that you spread on the Internet can be saved; therefore, even if it is deleted, it could be recovered and could impose liability on you and / or Evertec® of said publication to violate any state or federal law.

For these reasons, if the publication is related to Evertec® Group, LLC or its subsidiaries, collaborators, shareholders, customers, consultants or suppliers, it is important that you consider the following aspects:

- 1. As is the case at work, always be fair and courteous to Evertec® collaborators. shareholders, customers, suppliers or consultants. Keep in mind that you are more likely to resolve your differences by speaking directly with your co-workers or using our open-door policy than by publishing them on social media. However, if you decide to publish complaints or criticisms, avoid using statements, photographs, videos or audio that can reasonably be perceived as sabotage. malicious, obscene, threatening or intimidating, that discredit customers, collaborators, suppliers or consultants, or that may constitute harassment. Examples of this type of conduct include offensive publications to intentionally damage someone's reputation or publications that could contribute to a hostile environment in employment on the basis of race, gender, disability, religion or any other condition protected by law or policies of Evertec®.
- Comments made towards collaborators, managers and / or shareholders, that are considered as sexual harassment, are prohibited.
- The comments should not be of a discriminatory nature, for example comments related to gender, race, disability, religion, veteran status, social status, age, gender identity, sexual preference or any other statute protected by law.
- 4. No comments will be made that violate the HIPAA regulation (for example, comments on medical diagnoses of collaborators in general).
- The comments made must be in your personal character and not on behalf of Evertec® Group, LLC.
- 6. Collaborators must maintain the confidentiality of business secrets and private or confidential information of Evertec®, as well as of third parties that have

provided this type of information to Evertec®. Business secrets can include information on systems development, processes, products, knowledge and technology. Do not publish internal reports, policies, procedures or other confidential internal communications of the business. Laws related copyrights, registered trademarks. patents, publishing rights and / or intellectual property, of material belonging to Evertec®, and \ or customers and suppliers must be respected.

- Collaborators cannot communicate or give advice on securities insider information.
- 8. Collaborators who use social media should do so in their personal capacity, outside working hours and not as representatives of Evertec®. Collaborators who refer to their status as collaborators of Evertec® must include an explanatory note stating that the expressions in their publications are theirs and do not necessarily represent the position, strategies or opinions of Evertec®.

Even when collaborators use social media personal in their capacity, thev must comply with the Evertec® Code of Ethics, all guidelines, policies and as well as applicable laws and regulations, including laws on copyright, confidentiality, privacy, fair use and disclosure of financial information. For security reasons, collaborators cannot be able to post photos of areas restricted to the public, such as the Evertec® vault area.

Collaborators must respect the financial disclosure laws. It is illegal to communicate or offer internal information to other people so that they buy or sell securities or shares. These types of publications may violate the United States Securities Laws and the Evertec® Disclosure Policy. Examples of this type of information could be financial information, strategies, products or new services that have not been published by the company.

All Evertec® collaborators are required to comply with this section, with all other applicable policies

and guidelines, including but not limited to the Evertec® Code of Ethics, the Information Security Policy, the Systems Use Policy Information, Non-Public Confidential Material Information Traffic Policy and Evertec® Disclosure Policy. Failure to comply with the provisions of this section may entail the imposition of disciplinary measures, including termination of employment.

smoking

Evertec® is committed to providing all collaborators and visitors with a safe and healthy environment. Numerous studies conclude that smoking a cigarette, cigar, pipe or any other tobacco product contributes to causing or aggravating serious diseases, such as cancer, bronchitis, heart disease and emphysema, among others. It has also been found that some work teams are very sensitive and prone to damage due to smoke. Therefore, Evertec® has identified areas exclusively designated for smoking. If a collaborator sees a client or visitor smoking in an area not designated for smoking, they should request their cooperation in a courteous manner. If a collaborator sees another collaborator smoking outside the designated areas, their leader should be contacted and will handle the situation according to our guidelines. The use of electronic or steam cigarettes is not allowed outside designated smoking areas. All Evertec® collaborators must comply with this guide. Any violation may involve disciplinary action and the imposition of penalties provided by law.

controlled substances

Evertec® prohibits the use, possession, manufacture, distribution or sale of illicit drugs or controlled substances. It also prohibits all collaborators from being under the influence of illicit drugs or controlled substances, inside or outside our premises, inside or outside the workplace, in or out of work hours.

For purposes of this guide, a drug or controlled substance is any substance whose manufacture, sale, distribution, use or possession is prohibited or regulated by federal or local law or by any applicable law. Controlled substances include, but are not limited to opium or its derivatives such as heroin or cocaine morphine, hallucinogens, marijuana, amphetamines or barbiturates.

lf collaborator voluntarily informs his leader or People and Culture that they have a problem (outside of work hours, the work area and Evertec® grounds), they may continue their employment if they agree in writing undergo and commit to an adequate rehabilitation treatment and persevere it until their rehabilitation. The collaborator with this shall also comply guide, of conduct and agrees to submit to rules controlled detection tests of substances Evertec® requires without prior notice. In these cases, the information obtained from the collaborator and the fact that undergoing a drug rehabilitation treatment will be kept strictly confidential.

If the collaborator expressly refuses to participate in rehabilitation treatment or if the result of the additional tests proves positive, Evertec® may impose disciplinary measures, which may include termination of employment.

Under no circumstances is the sale of controlled substances allowed within Evertec® premises, the workplace or during work hours. Any collaborator who incurs in this action will be terminated from employment.

Likewise, collaborator who any owns, transports uses controlled or substances without medical prescription within Evertec®'s premises, the workplace or during work hours will be dismissed from their employment. Even if there has been no intervention by the relevant authorities. the violation occurs outside the Evertec® premises, outside the workplace, outside working hours or if it is suspected that a collaborator has violated this guide, Evertec® may suspend the collaborator

from pay and work while doing an investigation. At its discretion, Evertec® may terminate the employment relationship or impose another disciplinary sanction, unless the latter agrees in writing to satisfactorily participate in an adequate drug rehabilitation program and to strictly comply with this guidance.

If a collaborator is accused and convicted of violating a law related to controlled substances, he or she must notify People and Culture no later than three (3 days after being accused and / or convicted. Failure to comply with this notification requirement may result in termination of employment. A collaborator who is convicted or makes a prearranged plea of guilty or allegation of nolo contendere (did not refute the charges for a felony related to controlled substances, will be dismissed from his employment.

In any other case. collaborator the be suspended without pay while an investigation is being conducted. Depending on the results of said investigation and the circumstances of the case, the employment relationship may be terminated or, on some instances, another disciplinary sanction may be imposed, provided that the collaborator agrees in satisfactorily writing to participate rehabilitation program.

dress code and personal appearance

As a general rule, all collaborators must wear office attire while performing their work. This of attire will apply whenever functions of the collaborator or the needs business require it. We understand that each of the countries where we have subsidiaries have different rules concerning the appropriate dress code. We respect this diversity. Our Handbook allows the flexibility to those areas that are not exposed to clients or public. Management for each of our subsidiaries will determine the appropriate dress code.

The collaborator is responsible for dressing properly and their clothing must reflect the professionalism that characterizes our company.



The leader has the duty and authority to take disciplinary and corrective action with the collaborator who does not meet the described specifications.

Below are some guidelines to facilitate the selection of appropriate clothing:

- Take into account the work schedule when choosing clothing. It is very important to keep a record of the meetings you should attend, who will participate and where they will take place.
- For meetings not planned or communicated in advance, you should consider having appropriate clothing, as you will not be excused or given additional time to change.
- Always use good judgment and professionalism when choosing clothing.
- Consult any questions with the leader.

The following clothing is not considered appropriate for the work area:

- Torn or ripped pants, leggings, skirt with high slit (either front or back), miniskirt or very short skirt. Blouses or shirts with thin straps, tank tops, plunging necklines, short or sheer shirts, caps. Collaborators in work areas that are exposed to customers and/or public, may only wear jeans on Fridays.

Collaborators will use the dress code and personal appearance that matches their gender identity.

Those units whose functions require the use of uniform must abide and wear their uniforms as required.

Other dress code standards could apply at different times of the year depending on activities, strategies and / or corporate initiatives. These will be communicated with sufficient time in advance and must be followed.

Any collaborator who fails to comply with this directive is subject to disciplinary measures in accordance with our Rules of Conduct.

domestic violence

Evertec® keeps necessary measures to provide a safe environment for its collaborators, clients, visitors, to prevent domestic violence situations within the facilities, premises, and surroundings in and out of work hours. Evertec® will not tolerate and strongly repudiates any act of domestic violence.

Any act of domestic violence will not be tolerated as it constitutes an aggression and a criminal act against the person, collaborator and because it threatens the integrity, physical, mental, esteem and moral health of the victim.

Discrimination in the workplace against any Evertec® collaborator who is a victim of domestic violence, stalking, verbal, sexual or visual aggression will not be tolerated. All collaborators must inform their leader of any related event that could adversely impact the work environment. More information is available in the Domestic Violence Protocol on the Intranet or with an Officer of People and Culture.

electronic monitoring / surveillance Purpose

- Evertec® is committed to providing safe establishments for its collaborators, customers and guests and ensuring the productivity of its collaborators. Similarly, Evertec® is committed to maintaining the safety of our collaborators and the property of Evertec®, our customers and visitors; as well as ensuring the smooth running of our business, compliance with our policies and processes, and the good service we proudly offer to all our customers.
- For this reason, electronic monitoring equipment has been installed in some of our subsidiaries, including Global Positioning Systems (GPS), an electronic surveillance system consisting of security cameras and / or motion sensors in the physical facilities of Evertec®.
- Our policy on electronic surveillance and monitoring establishes the way in which aspects related to the use, storage, and disposal of all information collected through these systems will be regulated.
- · This document describes the procedure and management of the Electronic Monitoring and Surveillance Evertec® of applicable facilities and equipment. Management will evaluate the actions to be taken to avoid any situation that could of collaborators, jeopardize the safety clients, visitors or Evertec® property as well as the productivity of its collaborators.

Scope

 This policy applies to several areas and / or locations of Evertec®, such as parking lots, lobbies, reception areas, activity rooms, collaborator lounges, hallways, work areas, customer service areas, and other perimeters according to the facilities of each region.

- This policy seeks to define what equipment is used to implement electronic monitoring and surveillance.
- This policy establishes the actions to be taken if any situation or activity identified through electronic monitoring and surveillance, might put at risk the safety of Evertec® collaborators, clients, visitors or property, as well as the productivity of the collaborators.

Responsibility

• The interpretation and administration of this policy will be the responsibility of Evertec® People and Culture Executive VP and its designated staff. The personnel designated by the leader of the Physical Security Office of Evertec® applicable subsidiaries will be responsible for the operation of the video cameras and recording systems and will also be responsible for the security and custody of the video systems, including video recordings and / or audio when applicable, in accordance with the Evertec® Information Security policies and the Procedures adopted thereunder.

Global Positioning Systems (GPS)

Global Positioning Systems (GPS will be installed in some Evertec®'s official vehicles, depending on the country where you work. They will be used for the purpose of maximizing the resources that use corporate vehicles. leaders and managers will have access to the location of official vehicles through a protected interface and will safeguard the information provided therein.

Every collaborator who uses a corporate vehicle with GPS installed, accepts that the location of the vehicle is being monitored.

Objective of the Global Positioning System

- Maintain higher levels of security of corporate vehicles, being able to identify them in the case of theft.
- Maximize the collaborators in the assigned routes.
- · Monitor the entry and exit of resources with

assigned vehicles to maintain greater control of the use of unauthorized Extra Time in applicable cases

• Identify the need for vehicle maintenance. If this system identifies the misuse of Evertec® vehicles or that a collaborator is incurring in unauthorized overtime, disciplinary action may be taken, which could include dismissal.

Electronic Surveillance

Evertec® collaborators recognize and accept that because the following areas are considered public areas, they have no expectation of privacy in them: reception, corridors, collaborator lobby, offices, parking lots, as well as any other identified area as a monitored area. According to the above, the electronic surveillance equipment will be located in said public areas. Evertec® has posted notices in visible places within the Company and through our facilities, to inform our collaborators, customers, suppliers and visitors of the existence of an electronic surveillance system.

The surveillance team will only record images, not sound. These will provide clear and random images of the activities that are occurring in the different facilities where we operate, points or strategically selected areas, excluding those that by their nature have a clear expectation of privacy (e.g. bathrooms).

These cameras will be operated from a control center located in the Physical Security Office of Evertec®. Said control center will also possess the video-recording system. The surveillance cameras will operate seven (7) days a week, twenty-four (24) hours a day. Personnel with authority delegated by the Department of Physical Security will be responsible for the custody and operation of the surveillance team. Authorized staff will protect and safeguard the images collected by the system accordance with Evertec® Information Security policies and the Procedures adopted thereunder.

As for sound recording and to ensure the quality of our

services, a member of the Evertec® customer service team will be able to monitor and / or record telephone conversations between clients and collaborators that provide service to Evertec® customers. An automated message will warn the customer that their call can be monitored and / or recorded.

Video and / or audio recordings may be stored for a period not to exceed 110 days, they will be then deleted, unless retained as part of a criminal investigation, a judicial and / or administrative proceeding, or other bonafide use, as approved by Evertec® Management.

Only the Execcutive VP of People and Culture, Director of Internal Audit, Executive VP of Legal and Compliance, the delegated persons with authority by these Directors, and the personnel of the designated Physical Security Department, have the authorization to view the video recordings and / or listen to the audio recorded by the surveillance systems. In all other instances, only personnel with a need for knowledge and in accordance with the authorization of the Executive VP of People and Culture may view and / or listen to the video and / or audio recordings. applicants, clients, Collaborators. job visitors interested in reviewing any portion of the recordings may request authorization for such review in writing. In the request, you must specify the reasons why the person is interested in reviewing it. Evertec® will have the absolute discretion to approve or deny the aforementioned request.

Any improper or illegal conduct by the collaborator that violates the laws applicable to each country, as well as the policies and / or procedures of Evertec® that are detected through the electronic surveillance system, will be subject to disciplinary measures that could Include dismissal.

If by means of this surveillance or electronic monitoring a collaborator is identified performing any activity that could be placing the safety of Evertec collaborators, clients, visitors or equipment at risk, the corresponding corrective actions will be taken, which could include dismissal.

Any collaborator, job candidate, client or visitor complaint regarding has a implementation of this policy and the results of an investigation pursuant to this policy, should bring their complaint to the attention of People and Culture. Operators of camera security will be trained in the technical, systems legal and ethical parameters of appropriate use of security cameras. These operators will receive a copy of this policy and will provide an acknowledgment that they have read it and understand its contents.

family and sentimental relationships

Evertec® promotes an ethical work environment and is committed to employing and developing the best talent in the market, while guaranteeing fair work practices in compliance with the labor standards and procedures that govern us. At Evertec® the employment conditions of all our collaborators, including recruitment, promotions, merits, and transfers, are made taking into consideration the requirements of the job post and the needs of the business.

Evertec® allows the employment of marriages, family members, and domestic partners as long as there are no direct or indirect supervision lines between them and / or one of these collaborators do not influence the tasks. service or goods produced by the other collaborator. Collaborators with these of close relationships are welcome to report it through the Intranet in the section of potential conflict of interest. When two collaborators maintain a close family and / or sentimental relationship in the workplace that could constitute a violation of our policies and or procedures or be a potential conflict of interest, considered Evertec® will notify the area and / or group that one of the two collaborators must be relocated. None of the collaborators the area leader, be an report to same indirect leader of the other, or work in areas in which the processes may result in a conflict of interest.

In order to avoid any indication of possible conflict of interest, the leaders, in conjunction with People and Culture, will exercise their judgment to determine the movement and / or relocation these collaborators, according operational need. If one or both collaborators comply with the to adjustment, or if this is not possible, one of the collaborators must resign from their job. If the collaborators cannot agree as to which of the two will resign, Evertec® will be forced to dismiss the one with less seniority.

legal matters

Any court order, summons, claim, motion or citation to appear before an administrative or judicial forum, addressed to Evertec®, must be notified and a representative of Legal and Compliance must be contacted immediately to receive the documents. If a summoner visits Evertec® to serve a summons or legal document, and you are not a representative of the Legal and Compliance Department, you should direct the summoner to the authorized unit in your country.

visitors

Evertec® is focused on serving our clients efficiently and professionally. Due to the nature of the services we provide, Evertec® is exposed to visits from its customers and suppliers at all times. With the exception of programmed or authorized activities or meetings, the working day should not be interrupted by social events. Appropriate precautions must be taken to protect the surroundings and the systems. Access to unidentified or unescorted visitors may not be provided in private and sensitive areas.

corporate policies

guidelines and corporate policies

Evertec® is committed to ensuring that its collaborators comply with all applicable laws and regulations. It is also committed to ensuring that its collaborators are aware of the laws and regulations that dictate how business is done, as well as the processes developed to identify assess and monitor major risks. Evertec® has established a series of corporate policies that describe, in a general way, what is expected of its collaborators regarding their obligation to comply with these laws and regulations, as well as with their key management procedures. Every collaborator must strive to understand these corporate policies and comply with them at all times.

As a general rule, policies require approval from Evertec® Board of Directors and are of general nature, meanwhile guidelines and procedures do not require this approval and cover in detail the corporate guidelines. It is the duty of each collaborator to read both the policies the corporate guidelines to ensure that they comply with them. Below is a list of the corporate policies of Evertec®, together with a brief summary of the most important matters expressed in each of them and the divisions to be contacted in case additional information. All of questions or collaborators have the responsibility of carefully reading both the policies and the corporate guidelines, which are located Intranet. Evertec® relies on the cooperation and continuous commitment of its collaborators of complying with our policies and guidelines. If collaborator or requires has questions additional information about these guidelines and corporate policies, they may contact Legal and Compliance.

Anti-Money Laundering (AML) and OFAC

Establishes guidelines for the monitoring of client activities in accordance with the statutes and regulations of AML. It requires putting the policy

into practice, particularly the compliance program with the sanctions of the Office of Foreign Assets Control (OFAC, as well as putting into practice a risk assessment. We must understand the responsibilities established by the Bank Secrecy Act, OFAC and Suspicious Activity Reports (SARs. Failure to comply with this policy may result in disciplinary action, including termination of employment, and exposes us to criminal and civil liability. (Legal and Compliance)

Policy on the Traffic of Values based on nonpublic material information (Insider Trading Policy)

The Policy on the Traffic of Values based on nonpublic material information applies to each Executive VP, officer, collaborator, agent or principal shareholders of Evertec®, as well as to any person who has access to non-public material information about Evertec® and who has a fiduciary duty or other similar confidentiality relationship. In general, Evertec® prohibits any of the aforementioned persons from trafficking or recommending trafficking (buying, selling or transferring with securities of the corporation while holding nonpublic material information in order to generate a profit or avoid a loss. Any person who commits this conduct, regardless of the position held in Evertec® or if a benefit is generated from the transaction, will be subject to disciplinary measures that could include dismissal, and exposes the corporation to criminal and / or civil liability.

Evertec® prohibits any person in possession of confidential information from publishing about Evertec® customers, partners, competitors or suppliers, traffic securities of those companies while owning such information. These prohibitions apply to transactions in any account, whether its personal, a client, Evertec® or the beneficiary is a member of the Evertec® employee's family.

Non-public material information: (1) cannot be disclosed to other officers or collaborators of Evertec®, family, friends and others, (2) cannot be discussed in public areas or places, and (3) cannot be disclosed to third parties who may make inappropriate use of information. (Legal and Compliance)

Privacy Policy

Establishes the rules to collect, use, share, and secure the information of our clients, including the circumstances under which Evertec® can share this information with third parties and its subsidiaries. It provides that we are all responsible for ensuring the protection of confidentiality, security and integrity of our clients' information. Failure to comply with this policy may result in disciplinary action, including termination of employment, and exposes us to criminal and civil liability. (Legal and Compliance)

Business Continuity Policy

Establishes high-level guidelines to carry out the planning and preparation necessary to minimize losses and facilitate the continuity of those business functions called vital in case of a disaster. It provides that we cannot install or use the Evertec® systems in a manner that can create or cause disruption to the business or operation of Evertec® suppliers or supplier systems. Failure to comply with this policy may result in disciplinary action, including termination of employment. (Information Security Unit

Record Retention Policy

Establishes the minimum requirements that govern the document retention program, including the retention or destruction of documents in accordance with applicable laws. It details the functions and retention responsibilities of the working group created to implement this policy, as well as those of the officers, collaborators and representatives of Evertec®. It has the duty to create, use, store, retain, and destroy documents in compliance with applicable standards. It also establishes the

obligation to refrain from destroying documents in the event of receiving a document retention order (litigation hold notice. Failure to comply with this policy entails disciplinary measures, including termination of employment, civil or criminal penalties. (Legal and Compliance)

Information Security Policy

Affirms E vertec®'s commitment to protect its information assets against any unauthorized access, internal or external, by intruders and that authorized users have uninterrupted access to information. Reaffirms that the privacy of Evertec® customers, collaborators, associates and suppliers must be protected. It establishes the minimum guidelines that the information security program must contain, such as the functions and responsibilities of the components of the information security program structure, that standards, guidelines and procedures developed are consistent with business requirements and regulations, such as conducting risk assessments, monitoring and training, and responses to security incidents. Provides that we must ensure that the Evertec® information remains adequately protected against any unauthorized access or use. Failure to comply with this policy may result in disciplinary action, including termination of employment, and exposes us to criminal and civil liability. (Information Security Unit

Export Management and Compliance Policy

Establishes guidelines to achieve and maintain compliance with United States export laws and regulations and that Evertec's exports, implicit exports, re-exports, transfers and activities ® are carried out according to the Export Controls Regulations (EAR. Failure to comply with this policy may result in disciplinary action, including termination of employment, and exposes us to criminal and civil liability. (Legal and Compliance)

Anticorruption Policy

Evertec® establishes guidelines to ensure that its collaborators comply with the laws and regulations against corruption and bribery in the United States and in each country where it operates. Evertec® adopted policies and procedures in accordance with the United States Foreign Corrupt Practices Act (FCPA and the UK Bribery Act, as well as standards of conduct and practices that must be maintained in certain types of transactions to ensure compliance. Failure to comply with these policies may result in disciplinary action, including termination of employment, and exposes us to criminal and civil liability.

Your acceptance of this collaborator handbook confirms vour commitment to read and understand Anti-Corruption policies that include crimes of fraud. bribery, misappropriation or misappropriation of funds and any other conduct that is deemed to violate the conflict of interest and cause a or harm business ethics. These policies and procedures are located on the corporate intranet and confirm their ethical obligations, which include acting with honesty, integrity and good faith, and complying with applicable laws and regulations. (Legal and Compliance).

Disclosure Policy

Establishes the conduct expected of all directors, officers, persons authorized to speak on behalf of the corporation before third parties and collaborators of Evertec®, as well as the methods that Evertec® uses to communicate with the parties.

Related Party Transactions Policy

This policy prohibits transactions with companies linked to Evertec® without the due authorization of the Board of Directors or the authorized Committee to which this responsibility has been formally delegated, or the alternative that without due determination said authorization is not necessary for the related transaction. The policy

establishes the applicable legal requirements that govern transactions between corporations or related parties, indicates the transactions covered by the policy, responsibilities between the **Evertec®** Board of Directors. Designated Corporate Committees, Divisions contracting units, among others. Failure to comply with this policy exposes us to disciplinary measures, including but not limited to termination of employment, civil or criminal liability and the imposition of penalties on Evertec®. (Legal and Compliance)

Corporate Policy

This policy identifies the activities that are prohibited to be carried out in the name of Evertec® or any of its subsidiaries, as well as the entity, governing body, group or individual that authorizes each activity. These activities include but are not limited to securities, dividends, investments, capital expenditures, reorganizations, consolidations, acquisitions, mergers, indebtedness, litigation, encumbrances, certain labor agreements, material agreements, and transactions between subsidiaries, affiliates; issues of contributions and audits, among others. Failure to comply with this policy exposes us to disciplinary measures, including but not limited to termination of employment, civil or criminal liability and the imposition of penalties on Evertec® (Legal and Compliance).

Enterprise Risk Management Policy ERM

Is a process run by the Board of Directors, management and any other company personnel. The program applies to the strategic objectives of the entire company, and is designed to identify potential events that could affect the entity, as well as to manage the risk levels within the company's risk appetite to provide reasonable assurance about the compliance with the objectives of the company.

conclusion

Evertec® promotes and is committed to a safe and effective work environment. Everything stated in this Collaborator Handbook gives you a guide to the behavior expected of all collaborators.

If you have any doubt with what is stated in this Handbook, you should address it through your leader, department manager, executive VP or with People and Culture.

There may be special procedures, policies or benefits depending on the country where the collaborator is assigned. To get more information you must access the intranet, or request it through your leader or People and Culture Manager assigned to your country. It is the responsibility of each collaborator to be aware of these regional policies.



