

standards of conduct and performance

Evertec® has established a series of rules that promotes an effective and safe work environment to ensure equality and consistency in the management of internal policies. Through this we guarantee a service of excellence to all of our clients.

These rules define the Performance and Conduct Standards, which provide a guideline for the expected behavior from all of Evertec's collaborators. Besides a series of basic rules, we have included various examples of what could constitute as violations to each rule. These examples are provided as an illustrative manner and under no circumstance constitutes all the possible scenarios for infractions of the given rules. If any ambiguity exists in any of the standards, rules and/ or dispositions established by Evertec, the Company reserves its right to interpret the aforementioned rules at its discretion.

Evertec could take the disciplinary measures that it deems necessary depending on the severity of the collaborators conduct or the facts of the particular case under consideration, which could include verbal warnings, written warnings, suspension or termination of employment. It is important to mention that any written disciplinary measure, does not necessarily mean the delivery of a document or a particular format named "warning" and/ or "disciplinary measure". For example, an email sent by a leader to advise collaborator of any deficiencies on their work and/or the violation of any of the rules and policies of Evertec, will be considered a disciplinary measure without the need of any specific language.

These rules do not include, comprise and/ or comprehend all the situations that could negatively affect the proper and adequate

operation of Evertec. Therefore, when a violation is committed that is not included in this guideline, corrective measures will be applied depending on the severity of the case. There will be particular cases of collaborators, where the applications of these measures or the progressive disciplinary process will vary because of the working agreement dispositions and/or the importance of their role at Evertec. When the applications of the rule is in conflict with the employee's work agreement, Evertec will rule its decision on the dispositions of the employee's work agreement.

The history of violations to Evertec's rule and/ or disciplinary measures can be used to impose disciplinary sanctions that could include termination, regardless the date when the collaborator incurred on the alleged violation and/or if said violations are not related one with the other.

The content of these guidelines do not limit Evertec's faculty to terminate the collaborator relation at any given moment and without prior notice, or modify, eliminate or change the disciplinary procedure here established according to circumstances. 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.

standard	examples of deviation from the standard	disciplinary action			
		First Incident	Second Incident	Third Incident	Fourth Incident
1. Being present; performing our duties in the workplace according to the assigned schedule and correctly recording daily attendance.	a. Absences, tardiness or leaving early, whether excused or not; having a certain pattern of absences, such as before or after a holiday, certain days of the week or certain periods of the year.	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
	b. Not informing the leader, before starting the shift, of any absence or delay.	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
	c. Being absent for three consecutive days without communication or authorization from the leader.	Termination of Employment			
	d. Abandoning the work area without prior notification to the immediate leader.	Disciplinary action will depend on the seriousness of the deviation.			
	e. Not correctly recording daily attendance using the mechanism provided by Evertec®.	Written Warning	Final Written Warning	Termination of Employment	
	f. Recording the attendance of another collaborator, or allowing another collaborator to do it for you.	Termination of Employment			
	g. Incurring overtime or accessing systems outside of working hours without prior authorization.	Written Warning	Final Written Warning	Termination of Employment	
	h. Refusing to work overtime without just cause, provided it is reasonable and necessary for Evertec®.	Written Warning	Final Written Warning	Termination of Employment	
	i. Sleeping or doing other activities not related to work at the place of employment. This includes the use of personal cell phones and prolonged trips to the smoking area, among other non-tolerated behaviors.	The disciplinary action will depend on the seriousness of the deviation.			
	j. Not submitting medical certificate or certificate that medical attention was received, when collaborator has been absent from work alleging health issues, as established in every subsidiary.	The disciplinary action will depend on the seriousness of the deviation. Not complying with this requisite could affect collaborators request for a medical license and/or FMLA.			

standard	examples of deviation from the standard	disciplinary action			
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<p>2. Work efficiently according to the quality standards and instructions given by the leader. Demonstrate interest and a sense of responsibility in work performance.</p>	<p>a. Not doing the job with the highest level of interest, agility, promptness, responsibility or efficiency.</p>	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
	<p>b. Not following verbal or written instructions given by the leader.</p>	Disciplinary action will depend on the seriousness of the deviation.			
	<p>c. Not fully cooperating in any intervention or investigation authorized by the indicated levels of supervision, People and Culture and/or carried out by external auditors, government investigators or regulators.</p>	Final Written Warning or Termination of Employment	Termination of Employment		
	<p>d. Demonstrating poor performance.</p>	Disciplinary action will depend on the seriousness of the deviation.			
	<p>e. Deviation from Evertec®'s procedures.</p>	Disciplinary action will depend on the seriousness of the deviation.			
	<p>f. Deficiencies in the daily tasks, differences or register shortages, submitting reports, assignments with errors, failure to reach commercial goals, among others. Failure to satisfactorily meet the requirements and/or responsibilities inherent to the position.</p>	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
<p>3. Observe proper behavior, respect and courtesy toward customers, suppliers, co-workers or any other person. Avoid teasing or making bad taste jokes, using obscene language, disrespect, inappropriate comments of sexual, racial, political, religious, age, national origin, color, social status, marital status, sexual preference, gender identity, genetic information, eligible veteran, or impediment nature; or improper comments about any other classification protected by law.</p>	<p>a. Encouraging or advising another collaborator to be insubordinate; disobey instructions given by the leader, not perform their job or duties, or not complying with operational instructions, among others.</p>	Disciplinary action will depend on the seriousness of the deviation.			
	<p>b. Engaging in violent, disorderly conduct, malicious gossip, sleight of hand, use of abusive, threatening, provocative or obscene language against a colleague, leader, vendor, customer or any other person, among others.</p>	Disciplinary action will depend on the seriousness of the deviation.			
	<p>c. Disrespecting or not observing correct conduct toward the leader, co-workers, customers, vendor or any other person, among others.</p>	Disciplinary action will depend on the seriousness of the deviation.			
	<p>d. Incurring in threatening actions, skirmishes, fights, indecent or obscene acts, aggression, or provocation for any reason in the vicinity of Evertec® or outside of it, if the reason is related to employment, among others.</p>	Disciplinary action will depend on the seriousness of the deviation.			

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4. Strict confidentiality of all non-public matters of Evertec® will be kept. This includes information related to customers, products, business creations and private collaborator information, among others.	a. Disclosing or offering information of an official, confidential or non-public nature to clients, collaborators or persons outside of Evertec®, without being duly authorized.	Termination of Employment			
	b. Using 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.	Final Written Warning or Termination of Employment	Termination of Employment		
5. Comply with Evertec®'s security policy and ensure the fulfillment of all of them.	a. Not observing applicable safety and health rules, or contributing, through action or omission, to create a dangerous situation or one 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 are not allowed to send text messages while driving. In addition, as part of its Health and Safety Program, 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.	Final Written Warning or Termination of Employment	Termination of Employment		
	b. Smoking outside of designated or unauthorized areas of Evertec®.	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
	c. Failure to comply with Evertec®'s internal security rules. Failure to comply with traffic and vehicle parking rules, while they are under official management of the Company.	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
	d. Failure to comply with access control rules including, but not limited to, having a good-condition and visible identification card and correctly using it.	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
	e. Allowing non-collaborators, children, or people not authorized by Evertec® to remain in work areas, including family members, without the express authorization of their immediate leader.	Disciplinary action will depend on the seriousness of the deviation.			

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6. Demonstrate an appearance that reflects the professional image that is expected of all Evertec® collaborators.	a. Not caring for personal appearance or dressing improperly, according to the Personal Appearance and Dress Code.	Verbal Warning	Written Warning	Final Written Warning	Termination of Employment
7. Do not carry, use or store weapons or other objects without the proper authorization of Evertec®, during or outside working hours.	a. Carrying, using or storing firearms or other objects in Evertec® without authorization, which represent a danger to safety or human life.	Final Written Warning or Termination of Employment	Termination of Employment		
	b. Arrest and conviction for possessing, distributing, transporting or selling controlled substances. In the event 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.	Termination of Employment			
8. Use, distribution, transportation, possession or selling controlled substances (except in the case of a medical prescription) is not allowed.	a. Using, possessing, selling, administering or transporting controlled substances without a medical prescription.	Termination of Employment			
9. Attending work under the influence of alcoholic beverages is not allowed.	a. Show to work under the influence of alcohol and/or controlled substances.	Final Written Warning or Termination of Employment	Termination of Employment		
	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.	Final Written Warning or Termination of Employment	Termination of Employment		
	c. The ingestion of alcoholic beverages on the grounds of Evertec, except with prior authorization from People and Culture, is prohibited.	Final Written Warning or Termination of Employment	Termination of Employment		

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<p>10. Distributing promotions except for those authorized by People and Culture during working hours or on Evertec®'s ground.</p>	<p>a. Soliciting funds or registration fees for any purpose, without the proper authorization of People and Culture.</p>	Disciplinary action will depend on the seriousness of the deviation.			
	<p>b. Distributing or posting notices or printed material, or administering questionnaires, without the due authorization of People and Culture.</p>	Disciplinary action will depend on the seriousness of the deviation.			
<p>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.</p>	<p>a. Having affiliations, businesses or working at jobs in conflict with their work, or with the interests of Evertec® or carrying out activities against Evertec®.</p>	Final Written Warning or Termination of Employment	Termination of Employment		
	<p>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 those related, when they are done in an exaggerated manner.</p>	Final Written Warning	Termination of Employment		
	<p>c. Requesting or borrowing money from customers, suppliers or collaborators.</p>	Final Written Warning	Termination of Employment		
	<p>d. Carrying out your own business during work hours.</p>	Final Written Warning or Termination of Employment	Termination of Employment		

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	e. Making statements that can reasonably be considered false, malicious, intimidating or harmful to Evertec®, customers or collaborators, knowing their falsehood.	Termination of Employment			
	f. Obtaining personal benefits from the relationship with customers and suppliers.	Final Written Warning or Termination of Employment	Termination of Employment		
	g. Carrying out activities without authorization that affiliates Evertec® with candidates or political parties; political propaganda.	Final Written Warning or Termination of Employment	Termination of Employment		
	h. Performing or promoting social, recreational, political, religious, civic or sports activities within Evertec®, without the proper authorization of People and Culture.	Disciplinary action will depend on the seriousness of the deviation.			
12. Perform with integrity and honesty. Avoid committing fraud, embezzlement or other public crimes, or attempt to do so against Evertec®, customers, suppliers, collaborators, family members or any other identity.	a. Using Evetec®'s accounts, with or without the intention, for personal benefit through the management of deposits, withdrawals, payments and reimbursements.	Termination of Employment			
	b. Committing fraud or attempting to commit fraud, embezzlement or other crimes against any collaborator, customer, related party, supplier, family member or any other person.	Termination of Employment			
	c. Requesting and profiting from unofficial or unauthorized reimbursements. 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.	Final Written Warning or Termination of Employment	Termination of Employment		

standard	examples of deviation from the standard	disciplinary action			
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	d. Falsifying, altering, omitting or giving incorrect information, either verbally or in writing, 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, reports related to medical claims and receipts, sick leave, vacation, military leave and other leaves, medical plan, disability, job application and other official documents owned by Evertec®, among others.	Termination of Employment			
	e. Accessing customer bank accounts without authorization.	Final Written Warning	Termination of Employment		
13. Caring for and protecting Evertec® property; using it only for designated and authorized purposes.	a. Not keeping the work area clean and orderly; not taking care of work equipment (for example: computers, laptops, cell phones and any other equipment) whose use is designated or authorized for work purposes, among others.	Disciplinary action will depend on the seriousness of the deviation.			
	b. Using Evertec® equipment off-site, without due authorization from People and Culture, among others.	Disciplinary action will depend on the seriousness of the deviation.			
	c. Negligent use of; using or disposal of documents, portable equipment, or any other tool that contains information that is confidential property of Evertec®, related to the use of suppliers, customers, collaborators or businesses, among others. This also includes motor vehicles or any other machinery.	Disciplinary action will depend on the seriousness of the deviation.			
	d. Using work tools, equipment, motor vehicles or other Evertec® property for personal purposes, or different from those uses that are designated and authorized.	Disciplinary action will depend on the seriousness of the deviation.			
	e. Driving Evertec vehicles negligently and not complying with the appropriate traffic laws and/or internal regulations of Evertec®, including having your current driver's license at all times, among others.	Disciplinary action will depend on the seriousness of the deviation.			

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<p>14. Supervisory staff will ensure that in the event of termination of employment, the entire process is completed on time.</p>	<p>a. Not notifying People and Culture of the termination of a collaborator on or before their termination date and/or not terminating the employee's physical and systems access on or before their last day of work.</p>	Written Warning	Final Written Warning	Termination of Employment	
<p>15. To respect the law, characteristic and legislative intention of each of the laws and regulations that apply to Evertec® and each collaborator.</p>	<p>a. Failure to comply with any policy, law, procedure, regulation or order of the federal or state government, its courts and agencies including, but not limited to, the conviction for any felony or less serious offense, either by a prearranged plea of guilty or nolo contendere.</p>	Disciplinary actions will depend, among others things, on the nature and severity of the offense, the circumstances on which they were committed, the duties and responsibilities of the collaborator and its impact on Evertec®.			
<p>16. Not incurring in any action that may interrupt the good and regular functioning of Evertec®, even when said performance is not specifically contemplated in this manual as a fault.</p>	<p>a. Incurring in any action that affects the good and regular functioning of Evertec®, even though it is not specifically contemplated in this Manual as a fault.</p>	Disciplinary action will depend on the seriousness of the deviation.			

performance evaluations

It is Evertec®'s policy to perform at least one annual Performance Evaluation on all its collaborators.

The Performance Evaluations are intended to provide you with information about the positive aspects of your performance and the areas to be improved, according to the objectives that your leader expects of you and the values promulgated by Evertec®. Individual objectives to be evaluated will be given at the beginning of the year and may change from year to year, depending on business needs and management criteria. Performance Evaluations also provide a basis for the objective management of salary and incentive decisions that reflect individual merit, as well as when considering opportunities for promotion, transfer and job retention.

Evertec® will provide you with the opportunity to participate in this process by completing your self-evaluation, prior to your leader evaluating you and meeting with you to discuss your results in the Performance Evaluation.

Collaborators will not be evaluated while they are away from work or on leave. The collaborator must be active at work on the effective day for any change (salary, title or level) to become effective.

performance improvement program

The Evertec Performance Improvement Plan is intended to provide the collaborator who has performed below expectations with an opportunity to improve their deficiencies. In it, specific objectives are identified that the collaborator must fulfill within an established period. The determination to place an collaborator in this Plan will be made case by case, depending on the magnitude of the employee's deficiencies, the progressive discipline applied and / or the circumstances of the case, among other considerations related to Evertec's operation and its adequate and proper performance.

The purpose of the Performance Improvement Plan is to:

1. Provide tools for the collaborator to improve performance or behavior and correct the deficiencies in the performance of their objectives or organizational competencies in an established period.
2. Provide direction and manage performance situations identified in the performance evaluation of half or a full year.
3. Design and identify specific activities to help the collaborator obtain the expected performance.

When a collaborator concludes a Performance Improvement Plan, the leader and the Unit Manager will evaluate the employee's performance with the objectives and / or organizational behaviors indicated as deficient in the employee's evaluation. The management of the unit will determine if the collaborator complies or does not comply with them for the determination of continuity of employment.

All collaborators whose Annual Performance Evaluations show results that need to be improved, either by having obtained a rank of "middle bottom" or "bottom", will automatically participate in a Performance Improvement Plan. The collaborator who participates in a Performance Improvement Plan, who favorably approves it, must exhibit continuous and sustained improvement of their performance and organizational competencies over time.

Collaborators who participate in two (2) consecutive Performance Improvement Plans could be permanently separated from their job. People and Culture along with the Manager and leader will evaluate on a case by case basis to determine a decision and may use as reference the conduct of the collaborator, previous disciplinary actions and/ or the objectives established during the year among other things related to Evertec's operation and its adequate and proper performance.

In the event that during the term of their employment, a collaborator has to participate in more than one (1) Performance Improvement Program other than in consecutive years, Evertec will evaluate case by case the particular circumstances to determine which disciplinary measure to apply, which could include dismissal.