



CONFLICT OF INTEREST POLICY



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SEMPERTEX GROUP is an organization whose leaders actively work to create an ethical culture in business activities, in which employees develop their functions correctly, based on ethical principles, and supported by the Integral Management Policy and the SEMPERTEX GROUP Code of Ethics and Business Conduct.

Relationships with collaborators, clients, and other stakeholders at SEMPERTEX GROUP are built on transparency and mutual trust. As a result, before making a decision, our collaborators must confront ethical quandaries with criteria and inform their superiors.

In particular, collaborators must always avoid conflicts of interest in business transactions and counterparty knowledge procedures.

As a result, they must recognize that there is a conflict of interest in the analysis of warning signals, unusual operations, and the study of suspicious operations when they are carried out by spouses or permanent partners, relatives within the second degree of consanguinity, second degree of affinity, or first civil degree, or when the person in charge of carrying out the analysis has a personal interest or seeks to favor.

Similarly, a conflict of interest is recognized when the decision to perform the counterparty analysis involves the person performing the analysis's personal circumstances, or when the operations are carried out by spouses or permanent partners, relatives within the second degree of consanguinity, second degree of affinity, or first civil relationship.

Situations involving a potential conflict of interest must be documented and escalated to the higher management level of the unit in which the employee works in order for a final decision to be made in an informed and transparent manner.

The mere failure to report a (potential or actual) conflict of interest is considered serious misconduct.

LEONIDAS OYAGA LOEWY

PRESIDENT SEMPERTEX

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