

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

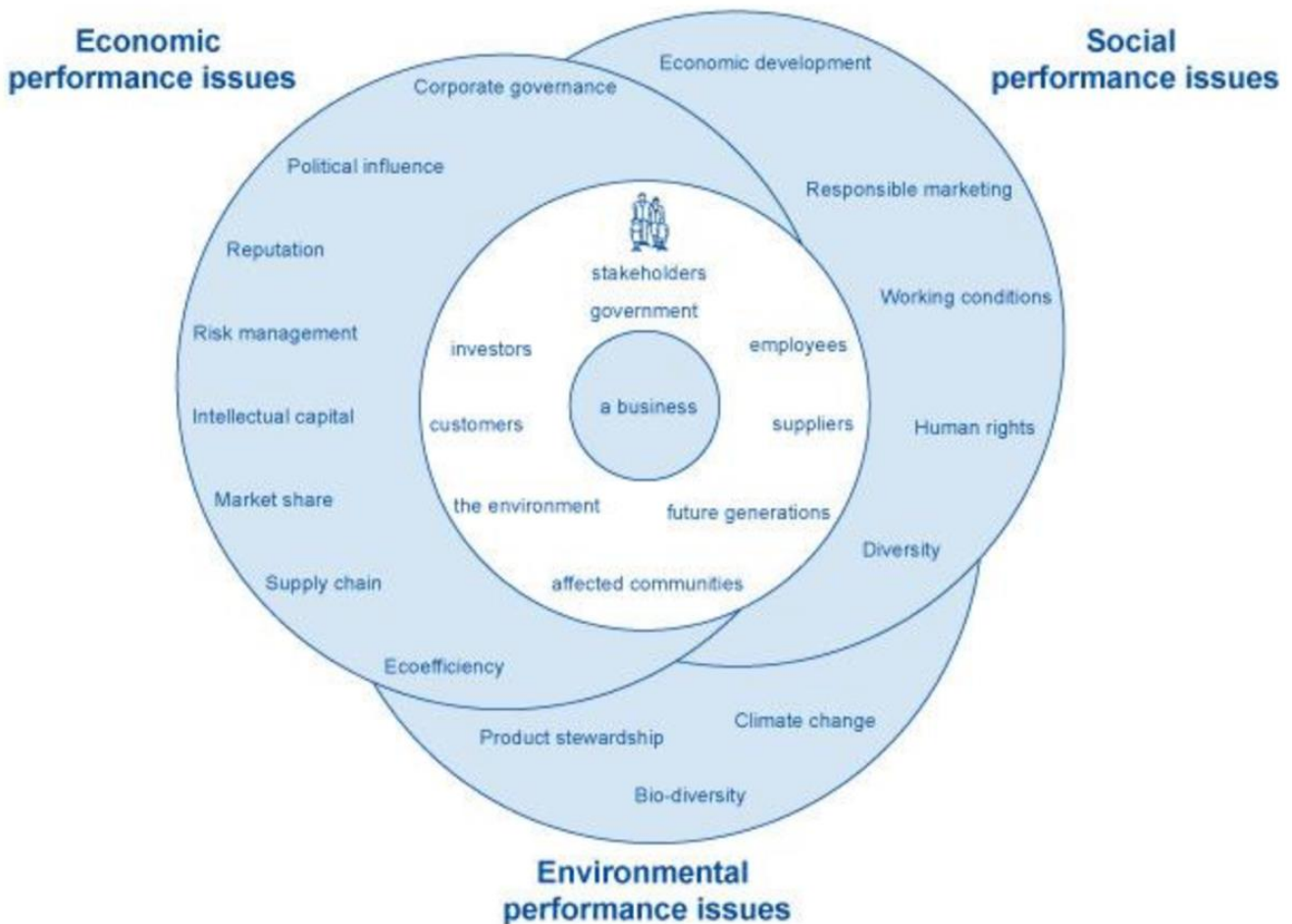
CORPORATE & SOCIAL RESPONSIBILITY POLICY

Introduction

Social responsibility allows our business interests to be reconciled with the legitimate interests of the different stakeholders that may be affected and assumes the impact of the company's activities on the community in general and the environment.

The present Corporate Social Responsibility Policy (hereinafter, "CSR Policy") intends to establish a reference framework, from which Blackburn Gould and Associates Ltd can develop and strengthen socially responsible behaviour, regardless of the way — conventional and/or digital — the business is carried out and the country it operates in, locally adapting any actions that are necessary for compliance with it.

Blackburn Gould and Associates Ltd aim to be a leader in the field of Corporate Social Responsibility (CSR) and are committed to ensuring the best practices to this end, we achieve this with a balance of economic, environmental, and social imperative known as a Triple-Bottom-Line- Approach as depicted below -



Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

Key potential benefits for implementation CSF Include:

Better anticipation and management of an ever-expanding spectrum of risk.

Effectively managing governance, legal, social, environmental, economic and other risks in an increasingly complex market environment, with greater oversight and stakeholder scrutiny of corporate activities, can improve the security of supply and overall market stability. Considering the interests of parties concerned about a firm's impact is one way of better anticipating and managing risk.

Improved reputation management. Organisations that perform well with regard to CSR can build their reputation, while those that perform poorly can damage brand and company value when exposed. Reputation, or brand equity, is founded on values such as trust, credibility, reliability, quality, and consistency. Even for firms that do not have direct retail exposure through brands, their reputation for addressing CSR issues as a supply chain partner - both good and bad - can be crucial commercially.

Enhanced ability to recruit, develop and retain staff. This can be the direct result of pride in the company's products and practices, or of introducing improved human resources practices, such as "family-friendly" policies. It can also be the indirect result of programs and activities that improve employee morale and loyalty. Employees are not only front-line sources of ideas for improved performance but are champions of a company for which they are proud to work.

Improved innovation, competitiveness, and market positioning. CSR is as much about seizing opportunity as avoiding risk. Drawing feedback from diverse stakeholders can be a rich source of ideas for new products, processes, and markets, resulting in competitive advantages.

Enhanced operational efficiencies and cost savings. This flow in particular from improved efficiencies identified through a systematic approach to management that includes continuous improvement. For example, assessing the environmental and energy aspects of an operation can reveal opportunities for turning waste streams into revenue streams (wood chips into particle board, for example) and for system-wide reductions in energy use, and costs.

Improved ability to attract and build effective and efficient supply chain relationships. A firm is vulnerable to the weakest link in its supply chain. Like-minded companies can form profitable long-term business relationships by improving standards, and thereby reducing risks. Larger firms can stimulate smaller firms with whom they do business to implement a CSR approach. For example, some large apparel retailers require their suppliers to comply with worker codes and standards.

Enhanced ability to address change. A company with its "ear to the ground" through regular stakeholder dialogue is in a better position to anticipate and respond to regulatory, economic, social, and environmental changes that may occur. Increasingly, firms use CSR as a "radar" to detect evolving trends in the market.

More robust "social licence" to operate in the community. Improved citizen and stakeholder understanding of the firm and its objectives and activities translates into improved stakeholder relations. This, in turn, may evolve into more robust and enduring public, private and civil society alliances (all of which relate closely to CSR reputation, discussed above). CSR can help build "social capital."

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

Improved relations with regulators. In a number of jurisdictions, governments have expedited approval processes for firms that have undertaken social and environmental activities beyond those required by regulation. In some countries, governments use (or are considering using) CSR indicators in deciding on procurement or export assistance contracts. This is being done because governments recognise that without an increase in business sector engagement, government sustainability goals cannot be reached

A catalyst for responsible consumption. Changing unsustainable patterns of consumption is widely seen as an important driver to achieving sustainable development. Companies have a key role to play in facilitating sustainable consumption patterns and lifestyles through the goods and services they provide and the way they provide them. "Responsible consumerism" is not exclusively about changing consumer preferences. It is also about what goods are supplied in the marketplace, their relationship to consumer rights and sustainability issues, and how regulatory authorities mediate the relationship between producers and consumers.

GOALS

Blackburn Gould and Associates Ltd defines its social responsibility as a "*voluntary and strategic commitment that entails attempting to achieve business targets while complying strictly with its legal and contractual obligations, applying criteria of equity and stability to relationships with its stakeholders, thus contributing to meeting the current and future needs of society*"

Promoting Corporate Social Responsibility at Blackburn Gould and Associates Ltd must be perceived as a way of:

- Achieving Blackburn Gould and Associates Ltd's corporate interest and its strategic goals.
- Managing the company based on the Blackburn Gould and Associates Ltd values of solvency, integrity, vocation for service, innovation for leadership and committed team, which must be present in any business project that is carried out.
- Establishing relationships of stability and equality with stakeholders related to the company, mainly those defined in the mission - shareholders, employees, providers, distributors, clients, and society.
- Managing the risks and business opportunities arising from the development of the environment in which Blackburn Gould and Associates Ltd does business, assuming the impact it generates on society and the environment, maximizing the positives and minimizing the negatives.
- Transmitting the company's social value in each territory, which reconciles the value of its operational activities with the value of the not-for-profit activities it carries out.

Therefore, and to be able to achieve these goals appropriately, the following general and specific principles of action are hereby established

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

LEADERSHIP COMMITMENT

The management team are committed to the integration of (CSR) in all corporate decisions and processes. Our workforce is expected to follow their example, this is monitored and measured via our company Critical success factors

Our leaders will ensure that appropriate structures are in place to effectively identify, monitor, and manage (CSR) issues and performance relevant to our business.

SUSTAINABLE VALUE CREATION

As a company aimed at high performance, we strive to maximize 'sustainable corporate value'. By this we mean to achieve a sound balance between profitability and (CSR). We recognise that sustainable corporate value is a continuous process of creating present and future corporate wealth, and that value creation comes from: high-quality assets, strong financial management, sound corporate governance, preservation of the natural environment and creation of relevant local capacities and *protection of the public* where we operate.

We will consider the creation of both short-term and long-term sustainable value in our decision-making.

GOVERNANCE AND BUSINESS PRACTICES

We conduct business in an open, honest, and ethical manner We comply with all laws and regulations where we operate. We recognise the importance of protecting all assets of the company including financial, physical, human, information, social, environmental, and reputation assets. We assess and manage our risks to effectively steward these assets.

We advise partners, contractors, and suppliers of our Corporate Social Responsibility Policy, and work with them to achieve compliance with the Policy.

Compliance with International Commitments.

Blackburn Gould and Associates Ltd adheres to the UN Global Compact, to the United Nations Environment Program Financial Initiative (UNEPFI) and the Principles for Sustainable Insurance, promoted by this initiative.

The voluntary adherence of any country or region to this type of international initiative has an impact on Blackburn Gould and Associates Ltd's reputation and entails compliance with the commitments assumed; it must therefore be authorised by the Corporate CSR Committee before its approval by the entity's competent governing bodies.

Compliance with current national and international laws and regulations in all countries that the Group operates in, adopting complementary international rules and guidelines such as those established by the OECD and International Labour Organization (ILO) agreements, wherever there is not a sufficient or appropriate legal framework.

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

Maintaining corporate governance practices based on ethics, business transparency and diversity: respecting the rules of the free market and free competition and rejecting any illegal or fraudulent practice contrary to the rules of good governance, to Blackburn Gould and Associates Ltd corporate policies and rules and to the guidelines of the Code of Ethics and Conduct, in order to accrue business benefits.

Blackburn Gould and Associates Ltd has internal mechanisms for preventing, monitoring, reporting, and penalising any practice described in the paragraph above that occurs within the Group.

HUMAN RIGHTS

Blackburn Gould and Associates Ltd's adherence to the United Nations Global Compact and its 10 principles directly commits us to the respect, defence, and protection of Human Rights, contained in the International Bill of Human Rights, the Conventions of the International Labour Organization (ILO), and the Declaration on Fundamental Principles and Rights at Work.

Therefore, in the Human Rights field, Blackburn Gould and Associates Ltd undertakes to:

- a) Avoid practices that are discriminatory or damage people's dignity:
 - A1. Striving for a decent, safe, and healthy working environment, adopting rules and procedures in the area of occupational health and prevention of occupational risks, avoiding any kind of discriminatory attitude, intimidation, or violence, in any of their manifestations due to sex, race, creed, religion, age, disability, political beliefs, sexual disposition, nationality, citizenship, marital status or socioeconomic status.
 - A 2. Rejecting child labour and forced or compulsory labour.
- b) To respect its employees' freedom of union, association and group negotiation and respect the role and responsibilities that apply to the representation of workers in accordance with current legislation.
- c) To provide decent employment:
 - C1. Blackburn Gould and Associates Ltd pays its employees in a decent manner, adjusted to their skills, responsibilities, and duties. This payment is aligned with applicable legislation and with conditions in the market where it operates, which allows them to meet their basic needs and those of their families.
 - C2. Blackburn Gould and Associates Ltd guarantees the right of its employees to a workday that respects their right to rest and that facilitates flexi-work practices, acknowledging employees' need to balance their work life with other interests and responsibilities.

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

C3. Blackburn Gould and Associates Ltd, likewise, guarantees people's right to personal data privacy.

- d) To implement due diligence procedures to identify possible situations of greater risk in relation to human rights, and to develop mechanisms for preventing and mitigating these risks in its activities.

To facilitate compliance with these commitments, Blackburn Gould and Associates Ltd will create a 'Guide to the Practical Application of Human Rights', which takes the following action areas into consideration:

- (a) internal, involving all company management and employees,
- (b) external, which involves stakeholders that are related to the company, especially suppliers and contractors.

The Guide will be based on the recommendations in the UN Guiding Principles on Business and Human Rights, the Blackburn Gould and Associates Ltd Code of Ethics and Conduct, and corporate policies that are determined in the general and specific principles of this CSR Policy.

LABOUR PRACTICES

We apply fair labour practices, while respecting the national and local laws of the communities where we operate.

We do not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment. We do not engage in forced or exploitative labour. We strive to provide local employment and economic opportunities in the communities where we operate. We treat our workforce with dignity, fairness, and respect.

Conservation and promotion of the Environment.

Blackburn Gould and Associates Ltd conducts its activity with a firm commitment to contribute to sustainability from an environmental perspective, materialized through the integration of the environment into the business, the promotion of environmental responsibility, preservation of biodiversity, prevention of pollution, efficient management of resources and adaptation and mitigation of climate change, in accordance with what is established in the Group's Environment Policy

Promotion of social responsibility, with active participation in national and international reference forums and organizations that promotes behaviour and commitment aligned with the content of this CSR Policy.

SPECIFIC PRINCIPLES OF ACTION

1. **Employees** - Blackburn Gould and Associates Ltd has a Code of Ethics and Conduct that establishes the rules that must govern behaviour and action among employees and in their relationships with third parties. Furthermore, it promotes a working environment based on an atmosphere of mutual trust and commitment, which involves:

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

- a) Consolidating a culture of respect for people and behaviour that is favourable and open to diversity faced with any of the Company's stakeholders.
- b) Guaranteeing the right to effective equal opportunities and dealings with all workers, which allows them — without exception — to develop personally and professionally.
- c) Avoiding any type of occupational discrimination in the areas of access to employment, promotion, professional classification, training, compensation, work/life balance and other working conditions.
- d) Contributing to maintaining working environments that are free of harassment and behaviour that is violent or offensive to people's rights and dignity, and guarantee that, if it occurs, there are appropriate procedures for dealing with the problem and correcting it.
- e) Achieving an optimal level of occupational security and achieving a working environment that allows Blackburn Gould and Associates Ltd professionals to carry out their work in the best physical and psychical conditions and conditions of well-being.
- f) Promoting the establishment of payment conditions that guarantee a decent salary, acknowledging the effort and contribution of employees to the company profit.
- g) Offering employees, the opportunity to channel and develop their most charitable side through Corporate Volunteering, in accordance with Blackburn Gould and Associates Ltd's General Volunteering process

2. **Clients and insured parties.**

They are the basis of the business, including the potential client and, therefore, Blackburn Gould and Associates Ltd assumes the following commitments:

- a) Providing honest assessment and full information regarding the characteristics and qualities of Blackburn Gould and Associates Ltd products and services, before they are hired.
- b) Providing an accessible and quality service within the agreed time frame, tracking the client experience, using surveys to measure their satisfaction and other methods and systems that facilitate continual active listening to the client in all the processes and operations where the latter relates to the company.
- c) Maintaining due confidentiality in processing their data.
- d) Managing and resolving their claims in the shortest time possible.
- e) Maintaining appropriate and efficient channels of communication using the most appropriate means.

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

- f) Continually innovating so as to provide added-value services and products, facilitating, and promoting access to insurance for the greatest number of groups.
 - g) Respecting and complying with the rules that regulate communications and marketing activities and assuming the voluntary codes that lend transparency and truth to these actions.
3. **Suppliers.** Blackburn Gould and Associates Ltd has a supplier relationship and management model that attempts to ensure a socially responsible and ethical process in its action with all the participants in the value chain. This involves:
- a) Adopting responsible practices that generate mutual value, in addition to focusing on efficiency and the quality of products and/or services provided by Blackburn Gould and Associates Ltd suppliers.
 - b) Ensuring that the value chain complies with Blackburn Gould and Associates Ltd's values and principles, with the Code of Ethics and Conduct and the principles established in this policy
 - c) Guaranteeing that both the Corporate Procurement Regulations and the General Model Guidelines and service provider management policies are complied with within the Group.
4. **Distributors/brokers.** Blackburn Gould and Associates Ltd distributes its products and services using a broad network of brokers and collaborating entities and therefore, assumes the following commitments:
- a) Maintaining permanent dialog using the specific platforms and commercial structures created for this purpose.
 - b) Ensuring selection and payment processes that allow professional responsibilities and skills to be valued, along with other aspects of interest that ensure the quality of the service provided.
 - c) Implementing a training model adapted to the needs of each distributor, paying special attention to training focused on compliance with Blackburn Gould and Associates Ltd values and strategy and the CSR Policy.
5. **Shareholders.** Blackburn Gould and Associates Ltd considers that its relationship with shareholders and investors, besides being based on trust, must have the goal of creating sustainable value, and undertakes to promote informed participation by shareholders at general meetings, dealing with them all in the same manner.
6. **Society.** Blackburn Gould and Associates Ltd is committed to the economic and social development of the countries where it carries out its activity and therefore:

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

a) Assumes the impact that its activity generates in society, evaluating and managing non-financial, ethical, governing, reputational, social, and environmental risk, in accordance with what is established in the Group's Risk Management policy, or any other complementary corporate policy adopted, and also with what is established in the general principle six of this policy, relating to Human Rights.

b) It is bound to those social activities or initiatives that benefit society.

In this regard Blackburn Gould and Associates Ltd considers that its priority social action sectors are as follows - disability, road safety and accident prevention, promotion of insurance culture, health promotion, the environment and corporate volunteering.

To develop its action areas, Blackburn Gould and Associates Ltd may establish collaborations with public or private organisations

c) It considers that it also contributes to the development of activities that lead to benefits for society through the line of sponsorships that it promotes, in accordance with the Corporate Sponsorship Manual

STAKEHOLDER ENGAGEMENT

We will consider the interests of all stakeholders and are committed to timely and meaningful dialogue with stakeholders and will address their legitimate issues and concerns within our sphere of influence. We will engage stakeholders clearly, honestly, and respectfully.

Based on transparency, truth and commitment, as fundamental pillars for building stable relationships that generate trust.

Blackburn Gould and Associates Ltd needs the involvement of its stakeholders, especially those defined in its mission, to achieve its business and social goals and, therefore, it has established specific channels for communication and dialog that also facilitate the company in learning about their needs and expectations.

Blackburn Gould and Associates Ltd undertakes to continuously review and adapt these channels, applying new technologies so that they are appropriate and efficient.

Furthermore, Blackburn Gould and Associates Ltd has available processes for identifying those matters considered material or relevant to the development of its business activity and for its stakeholders.

SOCIO-ECONOMIC AND COMMUNITY DEVELOPMENT

We emphasizes collaborative, consultative, and partnership approaches to community investment and programs, recognizing that no corporation is solely responsible for changing the fundamental economic, environmental, and social situation in a community.

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

Through our activities, we will assist in local capacity-building and develop mutually beneficial relationships to make a positive difference in the communities where we operate.

Fiscal responsibility

Blackburn Gould and Associates Ltd, aware that the payment of taxes has a direct impact on the financial and social development of the countries it operates in, meets its tax obligations in accordance with the fiscal legislation that exists in those countries, paying the corresponding taxes in accordance with the profit generated in each territory.

In this regard, the following commitments are assumed:

- a) Decisions with tax implications are adopted using a reasonable interpretation of the regulation, considering the business reality that generates the business that is the object of tax.
- b) The existence of significant tax risks is mitigated, ensuring that the tax is in suitable relation to the business structure in each country, considering the activities performed, and the material and human resources employed in each activity.
- c) In those jurisdictions where there are collaborative relationship systems between taxpayers and tax authorities, Blackburn Gould and Associates Ltd actively participates in an attempt to reduce conflict in the interpretation and application of tax regulations.

TRANSPARENCE

As a way of conveying and generating trust and credibility among our stakeholders. This involves:

- a) Disseminating relevant and truthful information regarding the Group's performance and activities, complying with any legal requirements that may exist regarding public information.
- b) Compiling and publishing financial and non-financial information using some of the internationally accepted methods in the latter case and subjecting it to the internal and external verification processes considered suitable that guarantee its reliability and provide an incentive for continual improvement.

MECHANISMS FOR DEVELOPMENT, MONITORING AND CONTROL OF THIS POLICY

This policy will be developed and will complement the different policies that are approved within the Group in direct relation to the general and specific principles of action established.

Reference	POL 06
Version	1.0
Issue Date	20/04/2022
Approved	MD

Blackburn Gould and Associates Ltd

CORPORATE & SOCIAL RESPONSIBILITY POLICY

The Blackburn Gould and Associates Ltd CSR Corporate Committee, a permanent internal body, with executive duties and faculties for providing information, advice, and proposals within its action sector, acting in accordance with its established responsibilities, will present an annual report to the Blackburn Gould and Associates Ltd, Directors and/or delegate body authorised in this regard, on the degree of progress in compliance with the CSR policy and strategy.

Signed Executive Director JOSEPH EBE ARTHUR

Date _____