

# Corporate Governance Architecture

The Board of Directors of Sagicor Financial Corporation Limited has approved the adoption of a Group-wide risk-based corporate governance architecture which conforms to international best practice. This architecture is designed to create a formal structure for the establishment, operation and monitoring of Corporate Governance standards and practices throughout the Group and, when fully implemented, will provide the Group with a comprehensive, consistent and integrated governance model.

## **Code Of Conduct & Business Ethics**

The architecture reflects the ethical and business values that shape and guide Sagicor. Our corporate value system embraces legal, moral and ethical conduct, accountability, corporate social responsibility and leadership. This corporate value system is set out in Sagicor's Code of Conduct & Business Ethics. The Code is based on the concept of the moral, ethical and legal obligation owed by Sagicor Directors, Management, Employees and Advisers to various stakeholders. It forms the basis of a number of other detailed policies which are intended to provide specific guidance in assisting all of us in applying acceptable standards of legal and ethical practice to our everyday work.

## **Fraud And Other Wrongdoing Policy**

The Fraud & Other Wrongdoing Policy applies to any fraud, suspected fraud, or other wrongdoing, or suspected wrongdoing involving employees, sales representatives, shareholders, directors, consultants, vendors, contractors and/or any other party with a business relationship with Sagicor.

## **Insider Trading Policy**

The Insider Trading Policy is designed to promote a fair and equitable securities markets for the protection of investors who are not insiders.