



INTELIGO BANK

Anti-Corruption Policy and Bribery

AUGUST 2023

Anti-Corruption Policy and Bribery

Code: CUMP-POL-011

General Overview of the Policy

Objective

To establish the guidelines that assist in preventing, identifying, measuring, controlling, investigating and correcting any corruption and bribery situations, promoting the establishment of a compliance culture while safeguarding the Bank's reputation.

Scope

This Policy applies to all Directors, Managers, Employees, Temporary or Contract Staff (jointly called "Employees") as well as to all Third Parties acting on behalf or to the benefit of the Bank.

Documents Related to Good International Practices

Central Bank of The Bahamas

Guidelines for a good management of the risks related to financial crimes in the Bahamas.

International Standards Organisation

ISO 37001: Anti-Bribery Management System

US Regulation

The US Foreign Corrupt Practices Act (FCPA).

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Corporate Documents Intercorp Financial Services

- Corporate Compliance Policy
- Code of Ethics
- Corporate Anti-Corruption Policy and Guidelines
- Manual for Handling Corporate Denunciations

This Policy shall be reviewed and evaluated at each Audit on the audited matter or issue.

- Corporate Policy for Managing the Ethics Channel
- Guidelines for Interacting with Public [Government] Official
- Guidelines for Donations, Sponsorships and Auspices

Other Related Policies and Processes

Manual:

- Code of Ethics and Conduct
- Corporate Governance Manual

Policies:

- Signing Up Customers and Opening Accounts
- Know your Employee
- Managing Providers, Suppliers, Vendors [Providers] and Third Parties
- Operational Risk Management
- Using Confidential Information
- Anti-Corruption Guidelines for Mergers and Acquisitions

Processes:

- Receiving and Investigating Denunciations
- Protocol for Escalating Denunciations
- Resolving and Closing Out Denunciations
- Due Diligence on Suppliers, Vendors and Providers [Providers]

Procedures:

- Scheduling and Recording Meetings with Public [Government] Officials

Methodologies:

- Corruption Risk Assessment

Responsibilities

- **Employees:** Comply with the guidelines set forth herein in order to prevent any corruption or bribery.
- **Prevention and Compliance Committee:** Supervise the anti-corruption and anti-bribery process.
- **Internal Audit Manager:** Undertake regular evaluations of the anti-corruption and anti-bribery process, according to their work plan and assure that the controls are effective and the Policy is complied with.

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- **Accounting Manager:** Keep complete and precise accounting records and books in order to prevent manipulations and sanctions because of a lack of internal accounting controls.
- **Division Managers and Area Managers:** Oversee that the anti-corruption controls are executed and applied by all areas and staff reporting to them.
- **Human Development Manager:** Uphold the confidentiality of the Directors, Managers and Employees regarding all information they provide about any suspicion of corruption or bribery for which they have reasonable grounds to so suspect.
- **International Division Manager:** Oversee effective, efficient and timely compliance of the anti-corruption and anti-bribery mechanisms set forth in this Policy.
- **Risk Manager:** Manage the corruption or bribery risks.
- **General Manager:** Promote and establish, throughout the whole Organisation, an institutional anti-fraud, anti-corruption and anti-bribery culture.
- **Legal Manager:** Check the necessary controls with third parties, in order to ensure that any agreements with them can be terminated whenever there is any violation of this policy or any applicable regulation.
- **Board of Directors:** Periodically review the anti-corruption system and prevention mechanisms.
- **Sponsorship Beneficiary:** Natural or juridical person benefitting from a sponsorship through a contribution from the Bank.
- **Undue Benefit:** Any profit (whether monetary or other) including, among others: illegal bonuses, bribes, commissions, gifts, favours or any other type of direct or indirect benefit, such as presents, hospitality, entertaining, discounts below market prices, job offers (remunerated or not), awarding of contracts and other business opportunities, political contributions, payments of expenses, donations, sponsorships, facilitation payments and payments for goods and/or services that do not have any reasonable business justification .
- **Corruption:** Abuse of private or public power in order to obtain an undue benefit (economic, non-economic; direct or indirect), in breach of ethical duties and principles and norms.
- **Donations:** Contributions of money, goods or services to entities receiving such donations in order to Support a social or socially relevant cause that seeks to serve the public interest without obtaining any benefits in return.
- **Fraud:** Occurs when a person, institution or entity illegally or incorrectly proceeds, regarding the parameters established in order to obtain some economic benefit.

Definitions

Public Official:

- Employee or civil servant of a local or foreign government (including departmental or regional, provincial, municipal, local or federal as well as of independent and semi-independent agencies, where the State does have some participation or a significant or relevant influence).

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- Any person exerting, even if only temporary or without remuneration, any mandate, position, employment or service for a national, regional or local state body by election, appointment, designation, contract or by any other means of investiture or trust.
- Employee or civil servant of companies owned partially or totally or that are controlled by a government or State.
- Employees of political parties.
- Employees of public international organisations (generally organisations consisting of Member States, like the UNO).
- Employees of companies owned or controlled by the State.
- Candidates standing for public or political office.
- Any and all persons acting in formal or material representation of the persons or entities mentioned hereinabove.

Entertainment: This consist of activities, entertainment or services provided by the Bank to its Customers and which are accorded in order to initiate or develop a business relationship, without expecting any consideration or value in return. These could include:

- Meals (breakfasts, lunches and dinners)
- Entertainment activities (invitation to events, concerts, etc.)
- Training, conferences, seminars

Whistle Blowing Line: This is the communications channel set up by the Bank for receiving denunciations regarding any violation of this policy.

Gifts or Presents: Any object of value, favour, promise of employment or benefit. These are given without expecting any consideration or value in return and could include:

- Marketing give-aways with the Bank's trademark or logo.
- Consumption vouchers in companies belonging to the Intercorp Group.
- Travel expenses (e.g. airline tickets or lodging).

Interested Parties: Natural or juridical persons that have some interest in the Bank, such as shareholders and investors. Interested Parties must comply with this Policy when acting on behalf, in representation or to the benefit of the Bank.

Sponsored Party: Juridical or natural person sponsored by the Bank.

Sponsoring: Contribution of money to the Beneficiary of the Sponsorship by Sponsoring the development and/or execution of sport, cultural, artistic, academic or social events or projects.

Bribe: Is the act of requesting, accepting, offering, delivering or promising an economic advantage or any other benefit by any of the Employees, Directors or Third Parties associated to the Bank in order to induce them to improperly execute a business or a public function, particularly, if such offer, promise or payment is considered to be dishonest, illegal or an abuse of trust, to the benefit of the Bank or a third party.

Third Parties: All such services rendered by providers, consultants, business partners, contracted or sub-contracted Third Parties, whether natural or juridical persons, regardless of the fact that they may have a formal agreement or not, using the name of the Bank for any purpose or providing services or materials,

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interact with government or with other non-governmental entities on behalf or to the benefit of the Bank. The dispositions of this Policy apply, in everything possible, to Third Parties.

Annexes Related

Understanding the Anti-Corruption and —Bribery Policy

Administration of this Policy

The International Division Manager is responsible for reviewing, updating and if necessary, revising this policy with the authorisation of the Board of Directors, after having been reviewed and approved by the Prevention and Compliance Committee.

Sanctions

Any failure to comply with this Policy will result in sanctions and disciplinary measures against such Employees, Directors and Third Parties, in according with the stipulations set forth in the Code of Ethics and Conduct. The sanction to be applied will depend on each case and shall always be consulted with the Compliance and Legal Areas. Such sanctions may go from a severe reprimand up to dismissal. Apart from that, civil and criminal actions may be filed. As very serious violations are considered:

- Failure to comply with the anti-corruption laws and guidelines described in the Anti-Corruption Programme, as this may result in significant civil and criminal sanctions, both for the Bank as well as for the Employees, Interested Parties or Third Parties involved (including substantial fines and prison sentences) and in significant damages to the reputation.
- Employees or Third Parties becoming aware of any potential failure to comply with the Anti-Corruption Programme and not denouncing this through the Bank's formal communications channels. Such acts are not only considered as serious violations but are also subject to disciplinary actions.

Each and every Employee and/or Third-Party misleading and/or obstructing an investigation into potential failures to comply with the Anti-Corruption Programme shall be subjected to disciplinary actions and other applicable repair measures.

General Overview

The Bank forbids all Employees, Directors or Third Parties working in its representation to participate in acts of corruption or to request and/or accept bribes.

It is the duty of the International Division Manager, as well as of all Employees to assure compliance with this Policy and compliance with the anti-corruption and anti-bribery rules and regulations. Should there be any discrepancy between the Anti-Corruption Programme and applicable laws, the most conservative position should be adopted.

The Bank is responsible for having due diligence controls for assessing the anti-bribery risk during the process of onboarding Customers, hiring Employees, electing Directors and appointing Third Parties.

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The Bank is responsible for having controls in place to ensure that any give-aways to the Customers do meet the criteria defined herein, thus preventing the presenting of gifts with a representative monetary value to Customers in return for obtaining or maintaining the business with PEPs and/or Public Officials.

Each and every Employee, Third Party or Interested Party becoming aware of or suspecting any failure to comply with or inadequate behaviour regarding the Anti-Corruption Programme is obliged to report this through the Ethical Whistle-Blowing Channel established thereto by the Bank.

Forbidden Conduct

All Employees should abstain from:

- Requesting, accepting, offering or delivering, directly or through an intermediary, provider or business partner, any payment or gift of any value. Some examples of such payments or gifts are:
 - ✓ Cash or Cash Equivalents
 - ✓ Gifts, meals
 - ✓ Invitations to events or meetings
 - ✓ Job offers
 - ✓ Business opportunities
 - ✓ Personal favours
 - ✓ Charitable or political donations
 - ✓ Plan tickets, travel, leisure travel, lodging, vacations
 - ✓ Promotion expenses
 - ✓ Sponsorships
 - ✓ Community benefits
 - ✓ Professional education
 - ✓ Club memberships
 - ✓ Providing confidential and privileged information
 - ✓ Conferences with all expenses paid
- Participating, in any way, in fraud, bribery or corruption practices, directly or indirectly, with public officials for accelerating, facilitating, thanking or rewarding the performance of a routine government act, like:
 - ✓ Payments for inadequately avoiding a fine or taxes.
 - ✓ Payments for corruptly influencing a decision to be made by a public official for issuing a permit or a license.
 - ✓ Payments for unduly influencing a judicial sentence in favour of the Bank.
 - ✓ Payments to government inspectors for not taking into account some safety standards or regulations.
- Using the Bank's resources for any illegal, undue or unethical purpose.
- Using third parties for offering such benefits through them as are not allowed within the Bank.

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Communications, Confidentiality of Information and Training

The Bank rejects any kind of reprisals against whistle-blowers that have, in good faith, filed any violation report.

The Bank's Ethical Channel is managed by an independent external company and admits anonymous denunciations.

All Employees are responsible for:

- Reporting or Denouncing, through the Ethical Whistle Blowing Channel Facilities made available thereto, such matters as may be defined herein or in the Know your Employee Policy and in the Code of Ethics and Conduct.
- Abstaining from executing buy or sell operations or engaging in any operation related to economic securities or benefits that have not been approved by the Bank, whether this is done in their own name, through intermediary or by a third party.

The International Division Manager and the Human Development and Management Manager are responsible for:

- Securely and confidentially administrating and managing all information received through the Ethical Whistle Blowing Channel about possible acts of violation of this Policy and anti-corruption regulations.
- Encouraging the use of the Whistle Blowing line established for reporting acts of corruption or the suspicion thereof.
- Upholding the confidentiality of all the information being provided, regarding any concern or suspicion of fraud and bribery that might have reasonable grounds.
- Protect the Bank's Employees who did blow the whistle in good faith about a violation of this Policy or the carrying out of any corruption or bribery behaviour against any type of retaliation.

The General Manager is responsible for:

- Assuring that any deeds incurring in criminal offenses are being reported to competent authority.
- Ensuring that the people that have been so charged do have the right to defend themselves by means of the presentation of evidence for explaining or clarifying their behaviour.

The Compliance Department is responsible for:

- Providing advice and guidance to the Bank's Employees regarding the Anti-Corruption Programme and taking care of such consultations as may be addressed to them in relation hereto.

General Overview of the Policy

- At least once every year, training the Employees about the corruption risks inherent in their activities. According to the level of exposure to such risks, additional training may be provided.
- Including the public objective, the methodology and the main topics to be treated in the Training Plan and keeping appropriate records of the training materials and attendance lists.

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Control Environment

The Board of Directors is responsible for:

- Assuring compliance in general of the anti-corruption and anti—bribery dispositions as well as how to provide the necessary resources needed for executing them.
- Periodically reviewing the anti-corruption system, in order to validate that it is still valid, adequate and continues to be effective.
- Appointing the person in charge of managing the anti-corruption and —bribery process.

The Prevention and Compliance Committee is responsible for:

- Supervising the anti-corruption and anti-bribery process.

The General Manager and the Board of Directors are responsible for:

- Assuring that all fees and expenses paid to third parties do represent an appropriate and justifiable remuneration for legitimate services (to be) provided that should be paid directly to them.

The Division Managers and Area Managers are responsible for:

- Assuring that the dispositions of the Anti-Corruption Policy are being applied and complied with in the departments they manage.
- Internally communicating the importance of an effective management of the Anti-Corruption Programme and the compliance with its dispositions.
- Directing and supporting the Employees for contributing to the effectiveness of the Anti-Corruption Programme.
- Externally communicating the issues related to the Anti-Corruption Programme.
- Overseeing that the Anti-Corruption controls are executed and applied by all areas and staff reporting to them.

The General Manager is responsible for:

- Assigning appropriate organisation and resources for managing compliance with the Anti-Corruption Programme.
- Assuring that the Anti-Corruption Programme is established, implemented, upheld and reviewed, in such manner that corruption risks are being tackled.
- Taking such measures as may be necessary for combating fraud, bribery and corruption, regardless of the form or typology used.
- Promoting and establishing, throughout the Organisation, an institutional anti-fraud, anti-bribery and anti-corruption culture.
- Approving the sanctions for violations of this Policy.
- Assuring that the roles and responsibilities of the Anti-Corruption Programme are assigned and communicated within and across all of the Bank's levels.

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- Implementing procedures that are designed for preventing that gifts, entertainment, donations and similar benefits be offered or accepted, where such offer, provision or acceptance is, or probably might be, perceived as an act of corruption or bribery.
- Assuring the attention to any requirement, request or diligence by any judicial or administrative authority with competence in that matter.

The International Division Manager is responsible for:

- Assuring that the Anti-Corruption Programme meets the legal requirements as well as those stipulated in the regulations that apply to the Bank's operations.
- Ensuring that the dispositions of the Anti-Corruption Programme are integrated into the Company's processes.
- Managing the Anti-Corruption and Anti-Bribery system designed by the Board of Directors.

Accounting Records and Books

In compliance with applicable law, the Bank keeps accounting records and books in a precise manner so that they do transparently reflect all operations. In compliance with that requirement, they are audited regularly (such audits may be carried out internally or by a provider assigned thereto by the Bank) and are subject to the Company's internal control procedures.

The Bank prohibits covert, unrecorded and undeclared operations. Regarding this instruction, the records of all payments made or received shall reflect such transactions precisely and appropriately.

All payments to Third Parties or Interested parties should be faithfully recorded and they should also have the supporting documentation duly analysed prior to disbursement, in accordance with the Procedure for Assessing, Mitigating and Monitoring the Corruption Risk in Third Parties.

The General Manager is responsible for:

- Keeping an accounting controls system for providing a reasonable security that the transactions or acts are duly authorised, executed and recorded.

The Accounting Manager is responsible for:

- Keeping complete and precise accounting records and books in order to prevent manipulations and sanctions because of a lack of internal accounting controls.
- Avoiding to make false or deceitful statements in any of the records or books or to any person, including the internal and external auditors, regarding the Bank's transactions or business or financial matters.

Risk Identification and Assessment

The Division Managers and the Area Managers are responsible for:

- Identifying the corruption or bribery risks.
- Reporting all the risks identified regarding corruption or bribery to the Risk Management Department, so that the corresponding assessments can be undertaken and that they can together establish the controls for the prevention and mitigation of those events.

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The Risk Manager is responsible for:

- Periodically validating the risk assessments done on the Bank's Customers, Employees and Third Parties in order to find out their business reputation as well as any relationship with government officials or government entity officials.
- Constantly evaluating the Anti-Corruption Programme through a risk based approach that includes the evaluation of:
 - ✓ Business type and operations and the relationships or commitments with the Customers.
 - ✓ Location of the business (e.g. customer service or operations of the business are located in a high corruption environment).
 - ✓ Size or volume of the business.
 - ✓ Interaction with the State (e.g. customer service or business operations that require an interaction with Public Officials).

The Compliance Department is responsible for:

- Identifying the sources that have enabled the materialisation of some act of corruption and give feedback to the respective owners of the processes about those vulnerabilities.
- Any other function that could be relevant for reducing the risk of any eventual failure to comply with the contents hereof.

Implementation of Anti-Corruption and Anti-Bribery Management

The Board of Directors is responsible for:

- Defining and approving the policies and mechanisms for preventing corruption and bribery.
- Reviewing the reports and following up on the observations or recommendations made, presented by the Prevention and Compliance Committee, making an express note thereof in the respective minutes.

The International Division Manager is responsible for:

- Overseeing an effective, efficient and timely compliance with the mechanisms for preventing corruption and bribery set forth herein.
- Presenting reports to the Prevention and Compliance Committee about the compliance with and the effectiveness of the mechanisms established, as well as the measures that have been adopted for correcting the failures in the mechanisms for preventing corruption and bribery.
- Recommending, to the Bank's Board of Directors and/or General Manager as well as to the CCO such measures as, in his or her opinion should be adopted in the event of any failure to comply herewith.

Monitoring and Following Up on the Anti-Corruption and Anti-Bribery Process

The Internal Audit Manager is responsible for:

- Undertaking regular evaluations of the anti-corruption and anti-bribery process, according to their work plan and assuring that the controls are effective and that the Policy is complied with.

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Criteria for Gifts and Entertainment

All Employees and Directors are responsible for following the guidelines related to gifts and entertainment.

No Employee or Director of Inteligo Bank is allowed to offer any gifts or entertainment to Customers, except for the Department in Charge thereof.

The Bank and its Third Parties are prohibited from accepting or granting:

- Gifts and/or entertainment in cash or by equivalent means regardless of the amount (e.g. gift cards or coupons).
- Gifts and/or Entertainment for any value from/to Public Officials.
- Gifts and/or Entertainment that create an impression or an implicit obligation that the person granting it will be entitled to preferential treatment for being awarded undue contracts, more favourable conditions or some other undue benefit.

The Compliance Department is responsible for:

- Approving the annual Customer loyalty plan.
- Establishing the criteria for selecting or approving such Customers as will receive a gift or entertainment from the Bank. Such selection and approval criteria are:

Criteria for presenting Gifts or Entertainment to Customers
<ul style="list-style-type: none">◦ The Customers to whom such gifts are awarded should be related to legitimate business objectives, because of their loyalty or upon special occasions such as birthdays, Christmas or commemorative acts.◦ It is forbidden to offer any gifts or other benefits to people, including political parties and authorities, the value whereof may influence or be considered to influence business decisions.◦ No gifts shall be offered to any Customer with such regularity or frequency as may generate an inadequate perception or that would defeat the purpose of this policy.

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- Establishing the criteria and prohibitions for selecting or approving gifts or entertainment:

Criteria	Prohibitions
<ul style="list-style-type: none"> ◦ Must be designed to neither influence the Customer nor to be perceived as influencing such Customer 	<ul style="list-style-type: none"> ◦ They may not be money in cash or equivalent items (e.g. discounts, gift cards, shares, loans, services).
<ul style="list-style-type: none"> ◦ Must have a reasonable value 	<ul style="list-style-type: none"> ◦ They shall not be made to obtain or maintain a certain business or business advantage.
<ul style="list-style-type: none"> ◦ Should be offered in good faith and without expecting any reciprocity 	<ul style="list-style-type: none"> ◦ They shall not be motivated as a desire to inadequately influence the Customer.
<ul style="list-style-type: none"> ◦ Should be offered in relation with a recognised event or festivity. 	<ul style="list-style-type: none"> ◦ They shall not be offered with such regularity or frequency as may generate an inadequate perception or that would defeat the purpose of this policy. ◦ They shall not be made in order to obtain or exchange any favourable dealings.

The General manager is responsible for approving any gifts that may not meet the criteria defined by the Compliance Department.

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Monitoring and Controlling Gifts and Entertainment

The Compliance Department is responsible for:

- Implementing controls for preventing the according or receipt of any gifts, entertainment, donations and similar benefits that and that may assist in identifying whenever they may be reasonably be perceived as corruption or bribery.
- Keeping a current record of the gifts and entertainment reports, which should include the following points:
 - ✓ The purpose of the gift
 - ✓ Information about the recipient of the gift:
 - Full name
 - Date of Birth
 - Address
 - Indicate if it is a PEP
 - ✓ The type of gift.
 - ✓ The business staff and Area involved in the process of selecting and approving the gift.
 - ✓ Criteria for according the gift.
- Reviewing, every six months, the data base of the gift records, in order to mitigate any corruption and bribery risks. The points to be reviewed with the most attention should be:
 - ✓ The frequency of the gift
 - ✓ The total annual amount spent (focussing on PEPs and Public Official
 - ✓ Types and reasons for the gifts allowed
 - ✓ Maximum cost per gift

Any gifts or entertainment received from customers, providers or business partners should be rejected by the Employee and returned. If the gift cannot be returned, then the Compliance Department should be informed immediately so that it can be recorded and submitted to an internal raffle.

Conflicts of Interest

Employees are responsible for:

- Treating all Customers courteously, providing them with all information required, clearly, concisely and transparently. At no time may any preferential treatment be given out of personal interest or personal affinity.
- Selecting providers for providing services or advice on which assets or products will be acquired. Such selections should be based exclusively on terms of competitive pricing, quality and service. Furthermore, any and all practices consisting of offering any undue commissions, bonuses or other remunerations in order to obtain an illegitimate benefit shall be rejected.

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Political Contributions, to Regulatory Entities and Relations with Political and Official Institutions

The Bank is responsible for:

- Abstaining from making any political contributions or donations to political parties and their foundations related to them.
- Not hiring any services for representing its interest or lobbying for relating to the authorities.
- Sharing its opinions through different associations in order to try to find a consensus for the industry positions, provided that such actions are in line with the principles of acting established in its ethical department and the Anti-Corruption Programme.

The Compliance Departments is responsible for publishing a list of relevant associations to which the Bank belongs.

All Employees should:

- Neither give any kind of contributions to any candidate for political office nor to any political party in any country.
- Neither request nor induce members of any law firm or regulatory entities acting in representation of the Bank, to offer any bribes to public officials in order to accelerate some process they are in charge of.

All Employees and Third Parties may:

- Make political contributions, only when there is no risk that such contributions are being understood or perceived as donations linked to the Bank and/or its interests.

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Corporate Guidelines

Interacting with Public Officials

Each and every interaction with Public Officials represents one of the main ethical and integrity concerns for the Bank, so that it is important to consider that any action, decision, conduct or communication, once we have established a relationship with a public entity, could unleash an investigation, sanction or even serious damages to our reputation.

Payments of any undue advantage to Public Officials are forbidden. This prohibition applies, regardless of value, form or type of payment and includes facilitation payments. Likewise, this prohibition applies to payments made out of the Employees', Third Parties' or Interested Parties' own pockets.

All Employees are responsible for timely reviewing the following situation with the Compliance Department:

- A Public Official or Close relative will participate in the corporate structure of a company to be contracted by the Bank.
- A Public Official requests contributions, sponsorship or political contributions.
- A Public Official or Close relative will be the final beneficiary of a particular business transaction or financial transaction.
- The Bank, or any other person on its behalf, meets with a Public Official to discuss a decision it is interested in.
- The Bank, or any other person on its behalf, meets with a Public Official for organising or keeping some business it is interested in.
- The Bank, or any other person on its behalf, incurs in expenses related to Public Officials or close relatives, whether linked to the regular performance of the Public Official or not.

There may be other cases, so that it is necessary that the Bank's Directors, Managers and Employees make an effort to identify similar situations and report them to the Compliance Area. Other cases:

- All meetings with Public Officials should be attended by at least two of the Bank's representatives.
- All communications with Public Officials should be made exclusively through official channels (official letters or corporate E-mails). It has to be taken into account that communications media like social networks, text messages or personal E-mails are considered non-official media.
- After interacting with any Public Official, the Bank's representatives should complete a record that should include, as a minimum: the time, place, attendants, issues discussed and related expenses, if any.

Due Diligence on and Payments to Third Parties

The Bank is responsible for any possible acts of corruption that Third Parties acting on its behalf may engage in. Hence, the Bank applies due diligence procedures in order to contract Third Parties with a good reputation, that share our values and that accept adhering to the principles established herein and in the Anti-Corruption Programme. Some considerations to be taken into account in the due diligence procedures to be undertaken by the Compliance Department are:

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- All Third Parties interacting with Public Officials on behalf of the Bank should be evaluated within six months after this policy has been issued.

Define the procedure for evaluating the Third Parties, considering their risk profile. For the evaluation of already existing Third Parties, a schedule will be defined defining when they should be reviewed.

The Legal Manager is responsible for:

- Checking that, in all third-party agreements, pertinent statements and guarantees are included regarding anti-corruption behaviour. The Bank may terminate such agreements whenever there is any violation of this policy or any applicable anti-corruption law or regulation.
- Validating that the Third Parties have signed the Anti-Corruption Clause and that this does include the right to carry out an audit on the services rendered as well as the possibility to interview the service providers, should there be any suspicion of corruption and the right to rescind the agreement or withhold payment upon failure to comply therewith.

All Employees are responsible for:

- Reporting the following alert signs to the Compliance Area:
- When the Third-Party requests for payment to be made in a currency other than the one of its fiscal residence.
- When the Third-Party requests for payment to be made in cash or when they have refused to provide an invoice or receipt.
- When the Third-Party requests that payments be made to the order of an intermediary.
- When any partners and/or executives of the Third Party are Public Officials.

Fusions, Acquisitions and other Investments

The Bank may:

- Acquire and/or hold control in other entities. Some examples of this activity are acquisitions, fusions and investments, among others.
- Holding a stake in some business. Some examples thereof are joint-ventures and limited corporations.

In order to reduce the risks of corruption and bribery in such transactions, the Bank shall apply a due diligence procedure in order to ensure compliance with applicable anti-corruption laws before concluding the operation.

This procedure shall be determined on a case by case basis and according to the nature of the transaction, always with the advice of a technical and legal advisor.

Donations and Sponsorships

All Employees or Third Parties are forbidden to give any donations and sponsorships to:

- Natural Persons

This Policy shall be reviewed and evaluated at each Audit on the audited matter or issue.

- Juridical Persons whose partners and/or officials are family relations up to the second degree of affinity of any of the Bank's Employees or former employees who left the Company less than 24 months ago.
- Juridical Persons and/or projects with a bad reputation or a lack of integrity (e.g. if they have been linked to corruption issues, fraud or child labour);
- Juridical Persons and/or projects that promote or could potentially promote a Public Official.

The donations or sponsorships granted by the Bank, or on its behalf, are subject to a prior due diligence being done on the beneficiary and must have prior and written approval from the Compliance Area.

Process of Hiring Employees and Directors

The hiring of Employees and Directors may be considered as a type of advantage and hence, if they are undertaken with the objective in mind of influencing a Public Official, shall be considered as acts of corruption.

The Human Development and Management Department is responsible for:

Applying the following rules to job offers (including other labour experiences or functions, whether remunerated or not):

- The Bank and its Third Parties are forbidden to make any job offers with the objective in mind of influencing, rewarding or persuading, in any manner, a Public Official.
- Any hiring outside the standard process (which is the process generally used for selecting and hiring professional people for equivalent levels) is prohibited. The Bank requires that all hiring be done on merit, that the candidates be qualified and eligible and that no preferential treatment shall be given to anybody.
- Whenever a candidate or a member of his or her family is identified as a Public Official during the recruitment process, the Compliance Area must be informed thereof so they can review the case and give their prior approval to the hiring of such person.
- Whenever a Public Official recommends a candidate to the Bank, then those candidates shall be subjected to an enhanced due diligence and, before offering any job, authorisation thereto should be given in writing by the Compliance Area.

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