

**TITLE X: CORPORATE GOVERNANCE****SUBTITLE II: ANTI-BRIBERY MANAGEMENT POLICY OF THE NATIONAL FINANCIAL CORPORATION B.P.****CHAPTER I: GENERALITIES****ARTICLE 1. OBJECTIVE**

Establish the intentions and direction of the National Financial Corporation B.P. through the formal expression of the Institution's Board of Directors, to strengthen and promote the principles of integrity, transparency, honesty, and compliance through the application of the SGA Anti-Bribery Management System in institutional management.

**ARTICLE 2. SCOPE**

The provisions of this management policy are mandatory for servers, as well as for business partners (suppliers, customers, and others) of the National Finance Corporation BP

The Anti-Bribery Management Policy comprehensively covers all the processes that the institution executes at the national level through its organic structure (headquarters, regional offices, and branches). (*See CFN BP Process Map*).

In addition, to prevent any type of acts of bribery, the application of this Anti-Bribery Management Policy will be made known to interested parties following the communication plan for the EMS.

**ARTICLE 4. INTERNAL CFN REGULATION**

4.1. Code of Ethics of the National Financial Corporation B.P., Title IV: Human Resources, Subtitle III: Code of Ethics, Chapter I: Code of Ethics, Regulation No. DIR-025-2019 of March 28, 2019:

4.1.1. Section I "Of the objective, scope, principles and corporate values, regulation",

4.1.2. Section V "Conflict of interest", and

4.1.3. Section VIII "Special Provisions"

4.2. Internal Regulation of Human Talent administration of CFN B.P.

4.2.1. Chapter 9. "Of the Disciplinary Regime"

4.3. Internal Work Regulations for servers covered by the Labor Code

4.3.1. Chapter 11. "Disciplinary Regime"

**ARTICLE 5. GLOSSARY OF TERMS**

- 5.1. **CFN B.P.:** National Public Banking Finance Corporation.
- 5.2. **Anti-bribery compliance function:** People with responsibility and authority for the operation of the anti-bribery management system. (NTE INEN-ISO 37001, SGA- Requirements with guidance for its use)
- 5.3. **ISO 37001:2016:** International Standard published by ISO to establish the requirements of an anti-bribery management system.
- 5.4. **Stakeholder:** Person or organization that can affect, be affected, or perceive itself as affected by a decision or activity. The stakeholder can be internal or external to the organization. (NTE INEN-ISO 37001, SGA- Requirements with guidance for its use)
- 5.5. **Servant:** It is understood as such, the public servant, being that person who works for the State; the employee or public servant provides his technical or professional data for tasks or missions of integration and facilitation of public officials. It must be taken into account that the term public employee is identical in meaning to that of the public servant.
- 5.6. **Management system:** Set of interrelated or interacting elements of an organization to establish policies, objectives, and processes to achieve these objectives. (NTE INEN-ISO 37001, SGA- Requirements with guidance for its use)
- 5.7. **SGA:** Anti-bribery Management System
- 5.8. **Bribery:** Offer, promise, delivery, acceptance, or request for the undue advantage of any value (which may be financial or non-financial), directly or indirectly, and regardless of its location, in violation of applicable law, as an incentive or reward for that a person acts or ceases to act concerning the performance of the duties of that person. (NTE INEN-ISO 37001, SGA- Requirements with guidance for its use)
- 5.9. **Business partner:** External party with which the organization has, or plans to establish, some type of business relationship. (NTE INEN-ISO 37001, SGA- Requirements with guidance for its use)

**CHAPTER II: ANTI-BRIBERY MANAGEMENT POLICY****ARTICLE 6. INSTITUTIONAL TECHNICAL COMPLIANCE**

The National Finance Corporation B.P. complies with the Ecuadorian Technical Standard NTE INEN-ISO 37001 Anti-bribery Management Systems - Requirements with guidance for its use and with identical adaptation to the official translation of the International Standard ISO 37001: 2016.

**ARTICLE 7. MANAGEMENT POLICY**

The following Anti-Bribery Management Policy of the organization is established:

CFN B.P. promotes the development of priority and strategic sectors in Ecuador, through financial, non-financial, and fiduciary credit mechanisms, aligned with the National Development Plan.

CFN BP is committed to combating bribery, creating a culture of integrity, transparency, honesty, and compliance that guides the actions of its servants, business partners, and other interested parties, so CFN BP is **EXPRESSLY PROHIBITED ANY ACT OF BRIBERY IN PROCESSES, PRODUCTS, AND SERVICES** of the institution on a national scale and any type of behavior or action that may constitute a violation of the current legal norm.

This commitment also covers compliance with the applicable national and international anti-bribery laws and the requirements of the EMS, as well as the commitment to continually contribute to their improvement.

CFN BP encourages in its servers, business partners, and other interested parties, the presentation of concerns in good faith related to the violation or possible violation of this anti-bribery management policy, guaranteeing that there is no retaliation or any act that damages or goes against the rights of the worker or their business partners.

CFN B.P. assigns the authority, status, competence, and independence to the person in charge of the Anti-Bribery Compliance Management.

The CFN BP will sanction the server that is immersed in acts that attempt against this anti-bribery management policy and the EMS, applying the due process of Human Talent Management, by current legal regulations and the internal regulations of the disciplinary system. **Additionally, the CFN B.P. will apply all necessary measures, the relevant corrective measures, as well as all the corresponding administrative and legal actions established in current regulations, in the event of non-compliance with the anti-bribery management policy by its business partners.**

Any CFN BP servant, as well as business partners and other stakeholders, have an ethical and moral obligation to inform and report any action, conduct, information, or evidence that is susceptible or suspected of violating this Anti-bribery Management Policy and/or the EMS requirements of this institution. For this, the following anonymous and confidential channel has been provided:

- In the Web page (<https://www.cfn.fin.ec/>) directly in the link of the Anti-Bribery Management System or, via email: [denuncias\\_sobornos@cfn.fin.ec](mailto:denuncias_sobornos@cfn.fin.ec)

CFN B.P. undertakes to take all necessary actions, within the scope of its powers, to avoid any type of administrative retaliation against the complainant or informant.

**Title coded based on:**

- Regulation No. DIR-072-2021 of November 17, 2021.
- Regulation No. DIR-048-2023 of September 6, 2023, published in the Second Supplement to the Official Registry No. 403 of September 25, 2023.