

TITLE X: CORPORATE GOVERNANCE

SUBTITLE II: BP NATIONAL FINANCIAL CORPORATION ANTI-BRIBERY MANAGEMENT POLICY

CHAPTER I: GENERALITIES

ARTICLE 1. OBJECTIVE

To establish the intentions and direction of the National Financial Corporation BP through the formal expression of the Board of Directors of the institution to strengthen and promote the principles of integrity, transparency, honesty and compliance through the application of the Anti-Bribery Management System SGA in institutional management.

ARTICLE 2. SCOPE

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

Anti-Bribery Management Policy comprehensively covers all the processes that the institution executes through **the powers and responsibilities established in the Organic Statute of Organizational Management by Processes of the National Financial Corporation BP and the Process Map of the CFN BP**

Furthermore, in order to prevent any type of bribery, the application of this Anti-Bribery Management Policy will be made known to interested parties in accordance with the communication plan for the EMS.

The SGA will be evaluated and subject to periodic reviews to ensure compliance with the anti-bribery objectives set by the Institution.

ARTICLE 3. LEGAL BASIS

3.1. **Constitution of the Republic of Ecuador** , Title IV “Participation and organization of power”, Chapter Seven “Public Administration”, Section Two “Public Administration”, Art. 233, Official Registry No. 449 dated October 20, 2008, and modified on January 25, 2021.

3.2. **Organic Law on Transparency and Access to Public Information** , Second Title “On public information and its dissemination”, Official Registry Supplement, No. 337 dated May 18, 2004.

3.3. **Organic Administrative Code** , Preliminary Book “Governing regulations”, “Title I “Preliminary”, Chapter Two “Principles of administrative activity in relation to people”,

Official Registry Supplement No. 31 dated July 7, 2017 and modified on December 31, 2019.

3.4. **Comprehensive Organic Criminal Code** , Official Registry Supplement No. 180, dated February 10, 2014 and modified on August 30, 2021:

3.4.1. Book One “Criminal Offences”

3.4.1.1. Title II “Penalties and security measures”, Chapter Two “Classification of penalties”

3.4.1.2. Title III “Comprehensive Reparation” Single Chapter “Comprehensive Reparation”

3.4.2. Second Book “Procedure”

3.4.2.1. Title II “Criminal action”, Chapter Three “Complaint”

3.5. **General Organic Code of Processes** , Book III “Provisions common to all processes”, Title II “Evidence”, Chapter I “General rules”, Official Registry Supplement, No. 506, dated May 22, 2015.

3.6. **Labor Code** , Codification 17, Official Registry Supplement 167 of December 16, 2005, and date of last modification September 26, 2012.

3.6.1. Title I “On the Individual Employment Contract”

3.6.1.1. Chapter I “Of its nature and species”

3.6.1.2. Chapter 4 “On the obligations of the employer and the employee”

3.6.1.3. Chapter 9 “Termination of the employment contract”

3.7. **Organic Law on Public Service** , Official Registry Supplement No. 418, dated April 1, 2011, and last modified date May 26, 2021.

3.7.1. Title II “Public servants”

3.7.1.1. Chapter 2 “On nepotism, disabilities and prohibitions”

3.7.1.2. Chapter 3 “On the exercise of a public office”

3.7.2. Title III “On the internal regime of human talent administration”

3.7.2.1. Chapter 1 “Of duties, rights and prohibitions”

3.7.2.2. Chapter 5 “Cessation of functions”

3.8. **General Regulations of the Organic Law of Public Service** , Chapter II “On entry into public service”, Section 1a. “Requirements for Entry”, Official Registry Supplement No. 418, dated April 1, 2011.

3.9. **Ecuadorian Technical Standard NTE INEN-ISO 37001:2016/ Amd 1:2024** (Anti-bribery management system - Requirements with guidance for use - Modification 1: Actions related to climate change) dated February 23, 2024

ARTICLE 4. CFN INTERNAL REGULATIONS

4.1. Code of Ethics of the National Financial Corporation BP, Title IV: Human Resources, Subtitle III: Code of Ethics, Chapter I: Code of Ethics.

4.2. Internal Regulations for the Administration of Human Talent of CFN BP

4.3. Internal work regulations for employees covered by the Labor Code

ARTICLE 5. GLOSSARY OF TERMS

5.1. **CFN BP:** National Public Banking Financial Corporation.

5.2. **Anti-bribery compliance function:** Persons with responsibility and authority for the operation of the anti-bribery management system. (NTE INEN-ISO 37001, SGA- Requirements with guidance for use)

5.3. **ISO 37001:2016:** International Standard published by ISO to establish the requirements for an anti-bribery management system.

5.4. **Interested party:** Person or organization that may affect, be affected by, or perceive itself as affected by a decision or activity. The interested party may be internal or external to the organization. (NTE INEN-ISO 37001, SGA- Requirements with guidance for use)

5.5. **Server:** This is understood as a 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 should be noted that the term public employee is identical in meaning to that of public servant.

5.6. **Management system :** A set of elements of an organization that are interrelated or interact to establish policies, objectives and processes to achieve these objectives. (NTE INEN-ISO 37001, SGA- Requirements with guidance for use)

5.7. **SGA:** Anti-bribery Management System

5.8. **Bribery:** Offer, promise, delivery, acceptance or request for an undue advantage of any value (which may be financial or non-financial in nature), directly or indirectly, and regardless of location, in violation of applicable law, as an incentive or reward for a person to act or fail to act in relation to the performance of that person's obligations. (NTE INEN-ISO 37001, SGA- Requirements with guidance for 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 use).

5.10. **Climate Change:** Refers to the long-term transformation of the Earth's meteorological conditions.

CHAPTER II: ANTI-BRIBERY MANAGEMENT POLICY

ARTICLE 6. INSTITUTIONAL TECHNICAL COMPLIANCE

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

ARTICLE 7. MANAGEMENT POLICY

CFN BP establishes the following Anti-Bribery Management Policy and assumes the following commitments:

Promote the development of Ecuador's priority and strategic sectors through financial, non-financial and fiduciary credit mechanisms, aligned with the National Development Plan.

Contribute proactively and continuously to its improvement in the fight against bribery, through the Code of Ethics and through the commitment of Senior Management, a culture of integrity, transparency, honesty and compliance can be established that guides the actions of its employees, business partners and other interested parties, which is why at CFN BP **ANY ACT OF BRIBERY IN THE PROCESSES, PRODUCTS AND SERVICES** of the institution at a national level is EXPRESSLY PROHIBITED, as is any type of behavior or action that may constitute a violation of the current legal regulations.

Comply with applicable national and international anti-bribery laws and EMS requirements.

Promote sustainable development by complying with the guidelines established in current regulations, to ensure that operations financed by CFN BP do not represent negative impacts on climate change.

Encourage its employees, business partners and other interested parties to present concerns in good faith related to the violation or possible violation of this anti-bribery management policy, guaranteeing confidentiality and non-application of reprisals or any act that harms or goes against the rights of the employee or its business partners, in case of reporting acts that contravene institutional ethics.

Assign authority, status, competence and independence to the person responsible for Anti-Bribery Compliance Management.

CFN BP will sanction any employee found to be involved in acts that violate this anti-bribery management policy and the SGA, applying the due process of Human Talent Management, in

accordance with current legal regulations and the internal rules of the disciplinary regime system. Additionally, CFN BP will apply all necessary measures, pertinent corrective measures, as well as all 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 employee, as well as business partners and other interested parties, have the ethical and moral obligation to inform and report any action, conduct, information or evidence that is likely or suspected of violating this Anti-Bribery Management Policy and/or the requirements of the SGA of this institution. For this purpose, the following anonymous and confidential channel has been established:

- On the website (<https://www.cfn.fin.ec/>) directly on the link to the Anti-Bribery Management System or via email: denuncias_sobornos@cfn.fin.ec

CFN BP undertakes to take all necessary actions, within the scope of its powers, to prevent any type of administrative retaliation against the whistleblower or informant.

Title encoded 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 Gazette No. 403 of September 25, 2023.
- Regulation No. DIR-001-2025 of January 17, 2025