



ANTI-CORRUPTION POLICY MANUAL OF BANCO DE RESERVAS AND SUBSIDIARIES

Approved by:

By Board Resolution No. XVIII dated June 27, 2023.

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I. INTRODUCTION

Banco de Reservas and its Subsidiaries have a responsibility to proactively do their part to combat bribery. Accordingly, this manual is to serve as guidance and disclose the accountability of their collaborators and Board members towards the operation of an anti-bribery management system, which allows the establishment of a culture of integrity, transparency, honesty and compliance.

Additionally, as a signatory to the United Nations Global Compact, Banco de Reservas undertakes compliance with the 10 principles set forth therein, among which, working against corruption and bribery can be cited.

Banco de Reservas has implemented a Code of Ethics approved by its Board of Directors, establishing the basic principles of its collaborators' actions in compliance with current laws and regulations, which include respect, integrity, transparency, excellence and confidentiality.

Anti-corruption practices constitute a major pillar for Banco de Reservas and its Subsidiaries, as compliance therewith ensures observance and strengthening of its institutional reputation, thus preserving its corporate image and that of their collaborators, Board members, suppliers and customers.

The Bank shall have zero tolerance regarding bribery and corruption, and is already committed to acting professionally, equitably, transparently, ethically and with integrity in all its relations with its different stakeholders. **It is in turn committed to developing an Anti-Bribery Management System in accordance with good practices, focused on continued improvement.**

In light of the foregoing, the Board of Directors of Banco de Reservas has resolved to formalize this policy, in compliance with Law No. 448-06 on Bribery in Trade and Investment in force in the Dominican Republic, and internationally recognized practices such as those laid down in the ISO 37001 Regulation. This Anti-Corruption and Bribery Policy ("the Policy") shall supersede any other Banco de Reservas documentation relating to bribery and corruption.

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Compliance with the provisions of this manual is mandatory, and thus it shall be used as reference material in the conduct of any activities. Any modification to this document shall be submitted to the Process and Quality Assurance Department, for assessment purposes and subsequent approval by the relevant bodies.

II. PURPOSE

This manual is intended to provide information and guidelines to all individuals working for Banco de Reservas and its Subsidiaries, on the recognition and approach of bribery and corruption issues, with the aim of developing in each collaborator and member of the Board of Directors of Banco de Reservas and its Subsidiaries, values that allow them to:

- a. Honestly and ethically conduct all of their business.
- b. Avoid any act that could adversely affect the integrity and reputation of the Bank and its Subsidiaries.
- c. Avoid being subject to any criminal sanction, for participation in a corrupt practice which, as a result, may lead to a fine or damage the reputation of the Institution.
- d. Provide for a management system with a view to avoiding bribery in its different forms.
- e. Establish the responsibilities of all employees and Board members of the Bank and its Subsidiaries, in terms of observing and sustaining the Institution's position as regards bribery and corruption.

III. SCOPE

This anti-corruption policy manual applies to employees and members of the Board of Directors that are part of Banco de Reservas and its Subsidiaries, in the exercise of their duties and responsibilities.

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IV. DEFINITIONS

Government Official: Any person holding a legislative, administrative or judicial office, by appointment, election or as successor, or any person performing a governmental duty, including for a government agency or body, or any official or agent of a local or international public institution, or any candidate for public office.

Bribery: Any direct or indirect offer, promise, delivery, acceptance or solicitation an improper advantage of any value (whether financial or non-financial in nature), regardless of its location, in breach of applicable law, as an inducement or reward to have any person act or fail to act in connection with the performance of such person's duties.

Business Associate: Any third party with whom the Institution has or plans to establish a business relationship of any kind. Business Associate includes, but is not limited to, customers, consumers, “business partnership”, business partnership associates, consortium members, third-party vendors, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors. This definition is deliberately broad and should be interpreted in accordance with the Institution's bribery risk profile, so as to apply to business associates who may reasonably be understood to expose the organization to bribery risk.

Third Party: Independent of the institution. In this policy, “third parties” means whom Banco de Reservas and its Subsidiaries may come into contact during the normal course of business, including customers, suppliers, distributors, business contacts, agents, consultants, advisers, public or private bodies - including their advisers, representatives and officials - politicians and political parties.

Bribery Offense: Either (a) an incentive or reward offered, promised or provided with an aim to obtain any commercial, contractual, regulatory, business or personal advantage. An incentive is something that helps to bring about an action or a desired result. A commercial advantage means that the Bank is in a better (financial, economic, reputational, or beneficial in any other manner) position than its competitors, than it would have been if the bribery or corruption had not taken place; (b) the payment of any part of a contract to employees of another contracting party, or the use of other techniques, such as subcontracts, purchase orders or consultancy agreements, to channel payment to public officials, political parties,

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party officials or political candidates, for employees of another contracting party, or their family members or business partners.

Corrupt Payments: Illicit payments made with the aim of promoting unlawful actions or for inappropriate purposes.

V. GENERAL PROVISIONS

- 5.1. Banco de Reservas and its Subsidiaries, their directors, executives, Board members, collaborators, consultants or contractors may not:
- a) Give, promise to give or offer any payment, gift or hospitality to a third party, or participate in or allow a bribery offense to occur, in the expectation or hope that a business advantage will be received, or as a reward for a business advantage already granted.
 - b) Give, promise to give or offer any payment, gift or hospitality to a third party, to “simplify” or expedite a routine procedure.
 - c) Accept any payment, gift or hospitality from any third party, in case they know or suspect that such payment, gift or hospitality is offered or provided on the basis of an expectation that a business advantage will be provided in exchange.
 - d) Threaten or retaliate against another employee or Board member who has refused to commit a bribery offense or who has expressed concerns under this Policy or the regulations of the Bank's and its Subsidiaries' Whistleblowing Hotline.
 - e) Participate in any activity that may lead to a violation of the provisions of this manual.
- 5.2. Failure to comply with the provisions of this manual may result in labor, criminal or civil sanctions that vary by offense, and may include summary dismissal as established in the Disciplinary Rules Manual and current regulations.

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VI. BRIBERY RISK ASSESSMENT

- 6.1. **As part of its commitment to continued improvement of the Anti-Bribery Management System**, the Institution is required to regularly conduct bribery risk assessments that:
- a) Identify any bribery risks that may be reasonably foreseen by the Institution.
 - b) Analyze, review and prioritize identified bribery risks.
 - c) Examine the adequacy and effectiveness of the Institution's existing controls in mitigating the bribery risks reviewed.
- 6.2. Banco de Reservas and its Subsidiaries shall establish criteria to assess their bribery risk level, which consider the Institution's policies and objectives.
- 6.3. The bribery risk assessment should be reviewed annually on a regular basis unless significant changes in the external and internal context warrant immediate review.
- 6.4. Banco de Reservas and its Subsidiaries shall retain documented information supportive of the bribery risk assessment, also demonstrating that it has been used to design or **continuously** improve the anti-bribery management system.

VII. ETHICAL COMPLIANCE, ANTI-CORRUPTION AND BRIBERY DUTY

- 7.1. The Compliance Officer has the responsibility and authority to:
- a) Oversee the design and implementation of the provisions of this manual.
 - b) Provide advice and guidance to employees and Board members on the provisions of this manual and matters relating to corruption and bribery.
 - c) Report on implementation performance in accordance with the provisions of this manual.

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- 7.2. The institutional unit charged with ethical compliance, anti-corruption and anti-bribery shall be provided with adequate resources and assigned to individuals of appropriate competence, position, authority and independence.
- 7.3. The institutional unit charged with ethical compliance, anti-corruption and anti-bribery shall have timely access, according to the severity of the identified situation, to the Compliance Committee and, subsequently, to the Bank’s Board of Directors and senior management, in case of any need to raise any issues or concerns regarding bribery or the anti-bribery management system.

VIII. COMPETENCIES

- 8.1. The Institution, through the Compliance Department in coordination with the Human Capital Management Department, shall:
- a) Determine the required competencies and profiles of all employees performing, under their control, work that affects anti-bribery performance.
 - b) Ensure that employees are skilled, based on appropriate education, training or experience.
 - c) Where applicable, take actions aimed at acquiring and maintaining the necessary competencies and assess the effectiveness of any such actions taken.
 - d) Retain appropriate documented information, as evidence of competency.

IX. AWARENESS AND TRAINING

- 9.1. The Bank’s Central Department for Compliance, **through its Ethics Compliance, Anti-Corruption and Anti-Bribery Officer**, shall promote awareness, as well as suitable and appropriate anti-bribery training, for all collaborators, Board members, **contractors and consultants of Banco de Reservas and its Subsidiaries**, to ensure that programs established in this connection are:

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- a) Consistent with the results of the bribery risk assessment.
- b) Updated annually, unless significant changes in the external and internal context warrant immediate updating, as necessary, to include new relevant information.
- c) Shared annually with all staff (at planned intervals as determined by the Institution), according to the roles of the collaborators with respect to the bribery risks to which they are exposed, and any changes in circumstances.
- d) Formulated in such a way as to maintain documented information about the training procedures, the content of the training, and when and who received it.

9.2. The Bank's Central Department for Compliance, through its Ethics Compliance, Anti-Corruption and Anti-Bribery Officer, shall coordinate via the Banreservas Academy:

- a. All training **on anti-corruption and anti-bribery policies, with their respective evaluations, be conducted before the end of December** of each year, **for positions related to activities identified with corruption risk according to the Institution's risk matrix.**
- b. The Ethical Compliance Subcommittee receive **a report on the trainings performed, including** a summary of **the results thereof and the duly certified staff.**

X. POLICY COMMUNICATION

- 10.1. All employees, Board members, consultants and contractors of Banco de Reservas and its Subsidiaries shall be familiar with the content of these anti-corruption policies, and be informed that they are available on the Bank's website for their review.
- 10.2. All employees, Board members, consultants and contractors of Banco de Reservas and its Subsidiaries shall be aware of any significant changes made to this manual. New Bank employees, Board members, consultants and contractors shall receive a copy of this manual and be informed about the relevance of any such changes.

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10.3. The zero-tolerance approach of Banco de Reservas and its Subsidiaries to bribery and corruption shall be conveyed to all its suppliers, contractors and business associates at the outset of the business relationship. Guidance on said communications shall be overseen with the Compliance Officer.

XI. RECORD KEEPING

- 11.1. Banco de Reservas and its Subsidiaries shall develop, implement, monitor and maintain a system of internal controls to provide for compliance with the provisions of this manual, promote a culture of integrity and uphold high ethical standards throughout the Institution.
- 11.2. Banco de Reservas and its Subsidiaries shall keep adequate financial records and implement appropriate internal controls which support the business reason for payments to third parties, for a period of 10 years.
- 11.3. All transactions shall be executed in accordance with Management general or specific authorization. Transactions shall be recorded as necessary to allow preparation of financial statements in accordance with the Regulations established under Monetary and Financial Law 183-02.
- 11.4. All of the Institution 's business associates shall implement internal controls and procedures that meet the above-mentioned criteria and enhance compliance with the provisions of this manual.
- 11.5. Banco de Reservas and its Subsidiaries shall keep accurate books and records available for inspection which fairly document all financial transactions, risk assessments, and due diligence performed.
- 11.6. All employees, Board members, consultants and contractors of Banco de Reservas and its Subsidiaries shall request the approval of any gift given or received and record it in the established gift record.

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- 11.7. Expenses incurred to third parties related to hospitality, gifts or expenses shall be presented in accordance with the policies of Banco de Reservas and its Subsidiaries, specifically recording the reason for any such expense.
- 11.8. All accounts, invoices, memoranda and other documents and records related to third-party transactions shall be fully and accurately prepared and kept, in accordance with the provisions of the Accounting and Payment Administration Procedures available for inquiry on the institutional procedure portal. The following actions are prohibited:
- a) Keeping “off-book” accounts or cash funds to facilitate or conceal undue payments.
 - b) Using false documents or invoices and keeping inadequate, ambiguous or misleading accounting records, as well as any other accounting procedure, technique or mechanism which may mask or conceal illicit payments.
- 11.9. Transactions identified as having greater than low bribery risk and requests for spending/payments shall be reviewed for red flags that indicate an improper business basis or pose unreasonable bribery risks.

XII. DUE DILIGENCE

- 12.1. Due diligence should be performed where the Institution’s bribery risk assessment has returned a greater than a low bribery risk in regard to:
- a) Certain categories of transactions, projects or activities;
 - b) Existing or planned relationships with certain categories of business associates; or
 - c) Specific categories of employees in certain job positions.
- 12.2. The Institution shall assess the nature and extent of bribery risk in connection with transactions, projects, activities, business associates and personnel that fall into said specific categories.
- 12.3. Bribery risk assessment shall include any due diligence necessary for obtention of

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sufficient information to enable bribery risk analysis.

- 12.4. Due diligence shall be adjusted to the frequency prescribed by the Due Diligence Subprocess available for inquiry on the Corporate Portal, as amended, and the current information may be taken into consideration regarding the legal or natural person subject to screening.

XIII. FINANCIAL AND NON-FINANCIAL CONTROLS

- 13.1. Banco de Reservas and its Subsidiaries shall implement the following:

- a) Financial controls to manage bribery risk in the various processes, activities or transactions determined to have a greater than low bribery risk.
- b) Non-financial controls to manage bribery risk in the institutional units in charge of purchasing, operations, finance, projects, marketing, public relations, accounting, business, human capital, and legal and regulatory matters.

XIV. IMPLEMENTATION OF ANTICORRUPTION AND BRIBERY CONTROLS BY CONTROLLED ENTITIES AND BUSINESS ASSOCIATES.

- 14.1. Banco de Reservas and its Subsidiaries shall implement rules and procedures that require all other institutional units or Subsidiaries controlled by or having a business relationship with the former to execute the following:

- a) Implement the Institution's anti-bribery management system.
- b) Implement their own anti-bribery controls, in each case, only to a reasonable and proportionate extent, in connection with the bribery risks faced by the controlled entities, taking into consideration the performed bribery risk assessment.

- 14.2. Banco de Reservas and its Subsidiaries shall implement control procedures in the case of business associates not controlled by the Institution for whom the bribery risk assessment or due diligence has resulted in a greater low bribery risk, and where anti-bribery controls implemented by business associates would help mitigate the relevant

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bribery risk, as follows:

- a) The Institution shall verify whether or not the business associate has anti-bribery controls in place which manage the relevant bribery risk.
- b) The Institution shall require the business associate to implement anti-bribery controls in connection with the relevant transaction, project or activity. This factor is to be considered when assessing the bribery risk of the relationship with this business partner and the Institution’s procedures to manage said risks.

XV. ACTIVITIES WITH BUSINESS ASSOCIATES

- 15.1. Corrupt payments through the Bank’s subsidiaries, agents, intermediaries, business associates, contractors or suppliers (either individuals or organizations) (“Associated Entities”) or payments to third parties where there is any reason to believe that all or part of the payment will go towards a bribe, shall constitute a breach of this policy.
- 15.2. Relationship with agents and other intermediaries shall be documented in the entity's standard terms and conditions for appointment purposes, which shall provide for compliance with the Policy and prohibit Associated Entities from making or receiving bribes on behalf of the Institution.
- 15.3 Any consideration paid to Associated Entities shall be appropriate and justifiable for purposes of the legitimate services rendered.
- 15.4. Associated Entities shall be required to keep adequate books and records available for inspection by the Institution, its auditors and/or investigating authorities.

XVI. GIFT GRANTING AND ACCEPTANCE

- 16.1. The institution shall implement procedures intended to prevent the offer, provision or acceptance of gifts, hospitality, donations or like benefits, where the offer, provision or acceptance is or could be deemed bribery.

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- 16.2. The Code of Ethics and Conduct for Employees of Banco de Reservas and its Subsidiaries shall be consulted for the criteria established regarding the granting or acceptance of gifts and/or hospitality from third parties.

XVII. SPONSORSHIPS, DONATIONS TO FOUNDATIONS AND OTHER NON-GOVERNMENTAL ENTITIES

- 17.1. Banco de Reservas and its Subsidiaries shall consider requests from local governments (municipalities) and organizations, with a view to fostering cultural activities and promoting community development.
- 17.2. Donation requests shall be carefully reviewed to ensure that contributions and donations made to foundations and other non-governmental entities are used for lawful purposes as set forth in this manual.
- 17.3. **Requests shall comply with the provisions of ISO 37001 (Anti-Bribery Management System) regarding prior due diligence and** avoiding giving any charitable contribution, donation, sponsorship or similar contribution, unless previously approved by the Administrative Committee or relevant body.
- 17.4. The Ethical Compliance Subcommittee shall review any donations, sponsorships or contributions reports and evaluate whether such reports comply with the provisions of the Anti-Corruption and Anti-Bribery policy.

XVIII. TRAVEL AND REPRESENTATION EXPENSES

- 18.1. Travel and representation expenses shall be consistent with the budget and approved without any alteration of the invoices and documents, for reimbursement purposes. Transparency and honesty must be maintained at all times.
- 18.2. Receipts and invoices shall have their accounting support and be reviewed by the institutional units in charge of financial control and auditing, as established in the Payment Administration Procedures.

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XIX. REPORTING OF POLICY VIOLATIONS

- 19.1. Employees, Board members, consultants and contractors of the Bank and its Subsidiaries shall fulfill the Bank's commitment to conduct its business and affairs legally and ethically.
- 19.2. Any employee, Board member, consultant or contractor of Banco de Reservas or its Subsidiaries who is aware of any case in which employees or related parties are requested to participate in any act prohibited under these Policies, or who is aware of any information suggesting that a violation of these Policies has occurred or is about to occur, shall report it to the Compliance Officer through the Whistleblowing Hotline.
- 19.3. Banco de Reservas and its Subsidiaries aim to encourage openness and support anyone raising any genuine concern in good faith under this manual, despite the fact that they may be wrong.
- 19.4. No employee, Board member, consultant or contractor of Banco de Reservas or its Subsidiaries should be investigated, demoted, penalized or subjected to other adverse consequences for refusing to participate in or allow a bribery offense, for raising concerns, or for reporting potential wrongdoing, even if it could result in losing business or being at a disadvantage.
- 19.5. Banco de Reservas and its Subsidiaries have a Whistleblowing Hotline through which whistleblowing and breach of the Bank's laws, rules, regulations or corporate policies must be reported, as established in the processes set out in the Corporate Portal.
- 19.6. Retaliation against anyone who raises a concern in good faith is prohibited.

XX. INVESTIGATION AND DOCUMENTATION OF REPORTS

- 20.1. The Compliance Officer shall, in coordination with the Audit Department, conduct an initial investigation on any report of solicitation to participate in a prohibited act or a potential breach of the Policy. Where the matter is considered potentially serious, the Ethical Compliance Subcommittee, the Audit Committee and, where appropriate, the Chairperson of the Board of Directors or Management, as applicable, must be informed,

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following the guidelines provided below:

- a) A written report of the investigation shall be prepared, in accordance with the procedures established in the Corporate Portal. Investigation shall include all relevant facts, and the people, times and dates involved.
- b) The Audit Committee shall instruct the performance of a forensic or security investigation, as the case may be. The Ethics Compliance Subcommittee, through the Compliance Committee, and the Audit Committee shall inform the Board of Directors or Management of the existence of an investigation.
- c) The identity of a person making a report should be treated as confidential to the extent possible and only disclosed where necessary or as required by law or a court order.
- d) Upon conclusion of the investigation, the persons charged with performance thereof shall furnish a written investigation report to the Ethics Compliance Subcommittee or other bodies required to review the case.
- e) In the event that any illegal, infringing or other questionable ethical conduct is detected, the Ethical Compliance Subcommittee shall cause corrective measures to be taken as the Board of Directors or Management deems appropriate to comply with the Policy and applicable law, and to remedy any unlawful situation, infringing conduct or other questionable conduct. The persons charged with the conduct of the investigation shall prepare or cause to be prepared a written summary of the corrective actions taken.

XXI. MONITORING AND REVIEW

- 21.1. The Compliance Department shall monitor the effectiveness and appropriate implementation of this Policy, considering its suitability, adequacy and efficiency. Any identified deficiencies shall be corrected as soon as possible.
- 21.2. Internal control systems and procedures shall be subject to audits to ensure that they are effective in countering bribery and corruption.

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- 21.3. Employees, Board members, consultants and contractors of Banco de Reservas and its Subsidiaries are responsible for the implementation of this Policy and shall ensure that they abide by the procedures set out herein to report any suspected irregularity.
- 21.4. Any employee, Board member, consultant or contractors of Banco de Reservas or its Subsidiaries may suggest improvements to the provisions of these policies through the Compliance Officer.

XXII. PERSONNEL SAFETY

- 22.1. The personal security of employees and Board members of the Bank and its Subsidiaries shall prevail in any risk situation, and all details must be reported to the Compliance Officer through any of the established means.
- 22.2. Details of any incident due to reports of attempted bribery, whether suspected or real, or breach of the provisions of these policies, shall be reported immediately through the Whistleblowing Hotline to the Compliance Officer, or through any other of the available channels.

XXIII. CONCERNS ABOUT THIS POLICY

- 23.1. All questions or concerns about anti-corruption and bribery should be addressed to the Ethical Compliance Inbox (bcumplimientoetico@banreservas.com).

XXIV. REFERENCE SOURCES

- a) Law No. 448-06 on Bribery in Trade and Investment.
- b) ISO 37001:2016 International Standard for Anti-Bribery Management Systems.
- c) OECD Ethics and Anti-Corruption Guide – UN
- d) The United Nations Global Compact: Regarding the 10 universal principles related to human rights, labor, the environment and the fight against corruption in its strategies and

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XXV. UPDATE HISTORY

Version	Approval reference	Description of Change
1	Twenty-fifth Resolution of the Board of Directors dated 07/27/2021	Creation of the Anti-Corruption Policy Manual, according to the results of the Anti-Bribery and Anti-Corruption Management Project conducted with the support of BDO consultants.
2	Eighteenth Resolution of the Board of Directors dated 06/27/2023	Update upon review by the Ethical Compliance Department and Consulting firm BDO, regarding: <ul style="list-style-type: none"> – Specification of the commitment for the development of an anti-bribery management system consistent with good practices and focused on continued improvement. – Restatement of the 'Awareness and Training' section, considering the obligation to certify through training the staff of positions related to activities identified as involving corruption risk according to the Institution's risk matrix, before December of each year, as well as the obligation to report the status of such certifications to the Ethical Compliance Subcommittee. – Inclusion of due diligence prior to the granting