

I, Vera Rocío Martínez López, Judicial Interpreter for the National District, duly sworn for the exercise of my duties, hereby CERTIFY that this is a translation of a document originally written in Spanish and its English version reads as follows: -----



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY MANUAL OF BANCO DE RESERVAS AND ITS SUBSIDIARY COMPANIES

Version No. 4

Approved by:

Thirty-Ninth Resolution of the Board of Directors dated August 12, 2025

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I. INTRODUCTION

Banco de Reservas and its Subsidiary Companies have the responsibility to proactively contribute to the fight against bribery, which is why this manual aims to guide and inform employees and members of the Board of Directors about their responsibilities in the operation of an anti-bribery management system, allowing for the establishment of a culture of integrity, transparency, honesty, and compliance.

Additionally, as a signatory of the United Nations Global Compact, Banco de Reservas commits to complying with its 10 principles, including working against corruption and bribery.

Banco de Reservas has a Code of Ethics approved by its Board of Directors, which establishes the basic principles for employee conduct in compliance with current laws and regulations, which include respect, integrity, transparency, excellence, and confidentiality.

Anti-bribery and anti-corruption practices represent a fundamental and basic pillar for Banco de Reservas de la República Dominicana (Banco Multiple) and its Subsidiary Companies, as adherence to them ensures compliance and strengthens institutional reputation, thus preserving its institutional image, as well as that of its employees, Board of Directors members, suppliers, and clients.

The Bank has zero tolerance for bribery and corruption and is committed to acting with professionalism, fairness, transparency, ethics, and integrity in all its relationships with its various stakeholders. At the same time, it is committed to developing an Anti-Bribery Management System in accordance with good practices, focused on continuous improvement.

Based on the foregoing, the Board of Directors of Banco de Reservas has decided to formalize this policy, in compliance with Law 448-06 on Bribery in Commerce and Investment, in force in the Dominican Republic, and with internationally recognized practices such as those established in ISO 37001:2025 standards. This Anti-Bribery and **Anti-Corruption** Policy ("the Policy") replaces any other Banco de Reservas document related to bribery and corruption.

Compliance with the content of this manual is mandatory; therefore, it must be used as reference material in the development of activities conducted. Any modifications to what is described in this document must be submitted to the Vice Presidency of Processes and Quality Assurance for evaluation and subsequent approval by the corresponding authorities.

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II. PURPOSE

This manual aims to provide information and guidelines to all individuals working for Banco de Reservas and its Subsidiary Companies on how to recognize and deal with bribery and corruption issues, with the objective of developing in each employee and Board member of Banco de Reservas and its Subsidiary Companies values that enable them to:

- a. Conduct all their business in an ethical and honest manner.
- b. Avoid acts that could reflect an adverse perception of the integrity and reputation of the Bank and its Subsidiary Companies.
- c. Avoid being subject to criminal sanctions for participation in corrupt practices that could consequently lead to fines or damage the Institution's reputation.
- d. Establish a management system that prevents bribery in its various forms.
- e. Define the responsibilities of employees and members of the Board of Directors of the Bank and its Subsidiary Companies in observing and upholding the Institution's stance on bribery and corruption.

III. SCOPE

This **anti-bribery** and anti-corruption policy manual applies to employees and members of the Board of Directors who are part of the Reserve Bank and its Subsidiary Companies in the performance of their duties and responsibilities.

IV. GLOSSARY

Corruption: a practice consisting of the use of functions and resources of those in an organization for the benefit, economic or otherwise, of its managers. With respect to the scope of activities of the ethical compliance, anti-corruption, and anti-bribery unit, this term is limited to acts related to bribery or corruption, collusion, influence peddling, malfeasance, conflicts of interest, bid manipulation, favoritism, gifts, and gratuities.

Public official: any person who holds a legislative, administrative, or judicial position, by appointment, election, or as a successor, or any person who performs a public function, including for a public agency or company, or any official or agent of a local or international public organization, or any candidate for public office.

Bribery offense: it can be considered (a) An incentive or reward offered, promised, or provided to obtain any commercial, contractual, regulatory, business, or personal advantage. An incentive is something that helps produce a desired action or outcome. A commercial advantage means that

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the Bank is in a better position (financially, economically, reputationally, or in any other way that is beneficial) than its competitors than it would have been if the bribery or corruption had not occurred. (b) the payment of any part of a contract made 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, party officials or political candidates, for employees of another contracting party, or their relatives or business partners.

Bribery: the offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which may be financial or non-financial in nature), directly or indirectly, regardless of its location, in violation of applicable law, as an incentive or reward for a person to act or refrain from acting in relation to the performance of that person's duties.

Business partner: an external party with whom the Institution has or plans to establish some type of commercial relationship. Business partner includes, but is not limited to, clients, consumers, 'business alliance' partners, business alliance members, consortium members, external suppliers, contractors, consultants, subcontractors, vendors, advisors, agents, distributors, representatives, intermediaries, and investors. This definition is deliberately broad and should be interpreted in accordance with the organization's bribery risk profile, so that it applies to business partners who can reasonably be understood to expose the organization to bribery risks.

Third Party: Independent of the Institution. In this policy, "third parties" means any individual or organization with whom the Bank of Reserves and its Subsidiary Companies may come into contact during their work, and includes clients, suppliers, distributors, business contacts, agents, consultants, advisors, and public and private organizations, including their advisors, representatives and officials, politicians, and political parties.

V. ROLES AND RESPONSIBILITIES OF THE ANTI-BRIBERY MANAGEMENT SYSTEM (SGAS)

The governance structure of the Anti-Bribery Management System is established according to the roles and responsibilities described below:

Board of Directors: The highest authority of the Institution, responsible for approving the Compliance Management Mandate, the Code of Ethics and Conduct for Employees and Suppliers, as well as the Anti-Corruption and Code of Ethics Policies. It receives periodic reports on the performance of the Anti-Bribery Management System through the defined governing body.

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The details of the functions and responsibilities of the Board of Directors are contained in the Internal Regulations of the Board of Directors of the Bank of Reserves of the Dominican Republic.

Compliance Committee: It is the governing body of the Anti-Bribery Management System, has direct dependency, and includes appointed members who are part of the Board of Directors, to ensure its autonomy and direct access to the highest authority of the Institution.

It has general responsibilities regarding the Anti-Bribery Management System, described below:

- a) Approve the annual training programs and plans on ethical culture, anti-bribery, and anti-corruption, and monitor their implementation.
- b) Review and approve the Anti-Bribery Management System guidelines and the Ethical Compliance, Anti-Bribery, and Anti-Corruption activities.
- c) Receive periodic reports and oversee compliance with the objectives and action plans of the Anti-Bribery Management System and the Ethical Compliance and Anti-Corruption activities.
- d) Provide periodic quarterly reports to the Board of Directors regarding the implementation of the Anti-Bribery Management System and the Ethical Compliance, Anti-Bribery, and Anti-Corruption activities.

Compliance Officer: Represented by the Vice President of Compliance. As established in the Compliance Management Mandate, he or she has direct access to the Chief Executive Officer, Board of Directors, Senior Management of the Institution, and subsidiary companies, as needed, and is the contact person with the supervisory authorities that make up the Monetary and Financial Administration.

It has the responsibility and authority to ensure and guarantee the proper functioning of the Anti-Bribery Management System, whose operational implementation is carried out through the Ethics, Anti-Corruption, and Anti-Bribery Compliance Unit.

Ethical Compliance Subcommittee: It is the supporting body under the Compliance Committee responsible for reviewing the results of the indicators defined to monitor the behavior of the Anti-Bribery Management System and Ethical and Anti-Corruption Compliance activities, and for recommending actions that ensure compliance with the guidelines of the Anti-Bribery Management System.

Ethics, Anti-Corruption, and Anti-Bribery Compliance Unit: It is the operational arm of the Compliance Officer, delegated to execute operations and exercise authority regarding Ethical

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Compliance and the Anti-Bribery Management System at Banco de Reservas and its Subsidiary Companies.

It has direct access to the Compliance Committee for the periodic submission of reports on the operational performance report and activities of the Anti-Bribery Management System as well as activities related to Ethical, Anti-Bribery, and Anti-Corruption Compliance.

Among its main responsibilities are:

- a. Ensure the proper design, development, improvement, and implementation of the Anti-Bribery System and the activities of Ethical, **Anti-Bribery**, and Anti-Corruption Compliance, as well as related mandates, codes, policies, and guidelines, for Banco de Reservas and its Subsidiary Companies.
- b. Develop, together with their supervisor, and ensure the execution of the work plan for Ethical, Anti-Corruption, and Anti-Bribery Compliance for the Bank and Subsidiary Companies.
- c. Report on the performance of the Anti-Bribery Management System to the relevant Work Committees, Senior Management, and other compliance functions, as appropriate.
- d. Ensure timely compliance with all requirements arising from agreements and/or international organizations and key stakeholders regarding ethical compliance, anti-corruption, and anti-bribery.
- e. Request information, feedback, and evidence from Senior Management and the corresponding units regarding compliance with the requirements and indicators of the Anti-Bribery Management System, in accordance with the established schedule.
- f. Present to the governing body a summary of the recommendations of Senior Management regarding the periodic report of the Anti-Bribery Management System.

Senior Management: For the purposes of the Anti-Bribery Management System, Senior Management consists of the Vice Presidents and Directors of the processes within scope, responsible for planning, directing, and controlling the entity's overall strategies and operations, and for monitoring the guidelines of the Board of Directors.

They have the responsibility to comply with and share at all levels of the Institution the guidelines established in the Anti-Corruption Policy Manual, as well as to support the implementation and maintenance of the Anti-Bribery Management System, through the following:

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- a. Ensure that the functional areas assigned to them or the processes in charge are executed according to the guidelines of the Anti-Bribery Management System and contribute to the mitigation of the identified risks for their units in this area.
- b. Participate and provide recommendations on the reports of the Anti-Bribery Management System to ensure their suitability, adequacy, effectiveness, and continuous improvement, and to promote the strengthening of ethical conduct at the institutional level, as required by the ethical compliance, anti-corruption, and anti-bribery unit.
- c. Provide information, feedback, and evidence of compliance with the requirements and indicators of the Anti-Bribery Management System, to promptly fulfill the requests made by the ethical, anti-corruption, and anti-bribery compliance unit.

Banco de Reservas Units and Subsidiary Companies: All Banco de Reservas units, as well as Subsidiary Companies, are responsible for managing inherent bribery risks arising within the scope of their functions. This responsibility includes:

- a. **The timely identification of risks, their assessment, continuous monitoring, and the implementation of adequate controls for their mitigation.**
- b. **Maintaining ongoing communication with the Anti-Bribery Management System (ABMS), providing information promptly or according to the established frequency regarding:**
 - **The risks identified in your unit.**
 - **Any relevant change in the nature, magnitude, or probability of occurrence of these risks.**
 - **The key risk indicators (KRIs) associated with your processes.**
 - **Any event or situation that may affect the institutional risk profile.**

The responsibilities and roles described in this document do not exclude other duties and functions defined according to the nature and purpose of the units duly established in the Work Committee Manuals, job descriptions, and processes.

The functions mentioned above are inherent to the Anti-Bribery Management System of Banco de Reservas de la República Dominicana -Banco Múltiple -. The specific roles and responsibilities for each Subsidiary Company are defined in the internal documents maintained by each controlled entity, according to its organizational structure.

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VI. GENERAL RULES

- 6.1 The following is prohibited for the Banco de Reservas and its Subsidiary Companies, their directors, executives, members of the Board of Directors, employees, consultants, or contractors:
- a) Giving, promising to give, or offering payments, gifts, or hospitality to a third party, or participating in or allowing a bribery offense to occur, with the expectation or hope of receiving a business advantage, or to reward a business advantage already granted.
 - b) Giving, promising to give, or offering a payment, gift, or hospitality to a third party to "facilitate" or expedite a routine procedure.
 - c) Accepting a payment, gift, or hospitality from a third party if you know or suspect that it is being offered or provided with the expectation of a business advantage will be given in return.
 - d) Threatening or retaliating against another employee or Board member who has refused to commit a bribery offense or who has raised concerns under this Policy or the whistleblower channel established under Banco **de Reservas** and Subsidiary Companies **Ethics Line Policy**.
 - e) Participate in any activity that may lead to a violation of the provisions set forth in this manual.
- 6.2 Failure to comply with the provisions of this manual may result in labor, criminal, or civil penalties, which vary depending on the offense and may include summary dismissal, in accordance with the Disciplinary Standards Manual and current regulations.

VII. BRIBERY RISK ASSESSMENT

- 7.1 As part of the commitment to the continuous improvement of the Anti-Bribery Management System, the Institution must regularly conduct bribery risk assessments that comply with:
- a) Identify the bribery risk that the institution could anticipate, **considering the factors listed in clause 4.1 of ISO 37001:2025**.
 - b) Analyze, assess, and prioritize the identified bribery risks;
 - c) Evaluate the suitability and effectiveness of the institution's existing controls to mitigate the assessed bribery risks;

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- 7.2 Banco de Reservas and its Subsidiary Companies must establish criteria to assess their bribery risk level, which consider the Institution's policies and objectives.
- 7.3 The bribery risk assessment should be reviewed regularly once a year, unless significant changes in the external or internal context arise that warrant an immediate review.
- 7.4 Banco de Reservas and its Subsidiary Companies must retain documented information demonstrating that the bribery risk assessment has been carried out and that it has been used to design or continuously improve the anti-bribery management system.

VIII. ETHICAL COMPLIANCE, ANTI-CORRUPTION, AND ANTI-BRIBERY FUNCTION

- 8.1. The Compliance Officer has the responsibility and authority to:
- a) Supervise the design and implementation of the requirements in this manual.
 - b) Provide advice and guidance to employees and members of the Board of Directors on the provisions of this manual and issues related to bribery and corruption.
 - c) Report on the performance of what has been implemented in accordance with the provisions of this manual.
- 8.2. The organizational unit responsible for ethical compliance, anti-corruption, and anti-bribery must be provided with adequate resources and assigned to individuals with the appropriate competence, position, authority, and independence.
- 8.3. The organizational unit responsible for ethical compliance, anti-corruption, and anti-bribery must have timely access, depending on the severity of the situation detected, to the Compliance Committee and subsequently to the Bank's Board of Directors and senior management, if it needs to raise any issues or concerns regarding bribery or the anti-bribery management system.

IX. CAPABILITIES

- 9.1. The Institution, through the Vice Presidency of Compliance, in coordination with the Vice Presidency of Human Capital, must:
- a) Determine the necessary competencies and profiles of employees who, under its control, perform work that affects anti-bribery performance.
 - b) Ensure that employees are competent, based on appropriate education, training, or experience.

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- c) When applicable, take action to acquire and maintain the necessary competencies and evaluate the effectiveness of the actions taken.
- d) Maintain appropriate documented information as evidence of competency.

X. AWARENESS AND TRAINING

- 10.1. The Vice Presidency of Compliance, through its Ethics, Anti-Corruption, and Anti-Bribery Compliance Officer, must facilitate awareness and adequate and appropriate anti-bribery training for employees, members of the Board of Directors, consultants, contractors of Banco de Reservas, and Subsidiary Companies, so that the programs defined in this order comply with the following:
 - a. Be adapted, considering the results of the bribery risk assessment.
 - b. Be updated annually, unless significant changes arise in the external and internal context that warrant immediate updating, as necessary to reflect new relevant information.
 - c. Provide all staff annually (at intervals determined by the Institution), as appropriate to employees according to their duties, with information on the risks of bribery to which they are exposed and any changes in circumstances.
 - d. Maintain documented information on training procedures, training content, and when and who received the training.
- 10.2. The Vice Presidency of Compliance, through its Ethics, Anti-Corruption, and Anti-Bribery Compliance Officer, must coordinate through the Banreservas Academy:
 - a. Ensure that all training on anti-corruption and anti-bribery policies, with their respective evaluations, is completed before the end of December each year for positions related to activities identified as being at risk of **bribery** or corruption according to the entity's **bribery** risk matrix.
 - b. Inform the Ethical Compliance Subcommittee of compliance with the training courses completed by submitting a summary of the results thereof and of the duly certified personnel.

XI. COMMUNICATION OF THE POLICY

- 11.1. All employees, members of the Board of Directors, consultants, and contractors of Banco de Reservas and its Subsidiary Companies must be familiar with the content of these **anti-**

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bribery and anti-corruption policies and be informed that they are available on the Bank's website for their review.

- 11.2. Employees, members of the Board of Directors, consultants, and contractors of Banco de Reservas and its Subsidiary Companies must be aware of any significant changes made to this manual. New employees, members of the Board of Directors, consultants, and contractors of the Bank must receive a copy of this manual and be informed of the importance of the changes.
- 11.3. The zero-tolerance approach of the Reserve Bank and its Subsidiary Companies to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of the business relationship. Advice on these communications should be sought from the Compliance Officer.

XII. RECORD KEEPING

- 12.1. Banco de Reservas and its Subsidiary Companies must develop, implement, monitor, and maintain a system of internal controls to facilitate compliance with the provisions of this manual, foster a culture of integrity, and maintain high ethical standards throughout the institution.
- 12.2. Banco de Reservas and its Subsidiary Companies must maintain financial records and have adequate internal controls in place to demonstrate the business reason for making payments to third parties, for a period of 10 years.
- 12.3. All transactions must be executed in accordance with general or specific authorization from management. Transactions must be recorded as necessary to enable the preparation of financial statements in accordance with the Standards established by Monetary and Financial Law 183-02.
- 12.4. All the entity's business partners must have internal controls and procedures in place that comply with these criteria and improve compliance with the provisions of this manual.
- 12.5. Banco de Reservas and its Subsidiary Companies must keep accurate books and records available for inspection that fairly document all financial transactions, risk assessments, and due diligence performed.
- 12.6. Employees, members of the Board of Directors, consultants, and contractors of Banco de Reservas and its Subsidiary Companies must request approval for any gift given or received and record it in the established gift registry.

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- 12.7. Expenses incurred to third parties related to hospitality, gifts, or expenses must be submitted in accordance with the policies of Banco de Reservas and its Subsidiary Companies, and the reason for the expense must be specifically recorded.
- 12.8. All accounts, invoices, memorandums, and other documents and records related to transactions with third parties must be prepared and maintained with strict accuracy and integrity in accordance with the Accounting and Payment Management processes available for consultation on the institutional processes' portal. The following actions are prohibited:
- a) Maintaining "off-the-books" cash accounts or funds to facilitate or conceal improper payments.
 - b) Using false documents and invoices, as well as keeping inadequate, ambiguous, or misleading accounting records and any other accounting procedure, technique, or device that conceals or disguises illegal payments.
- 12.9. Transactions identified as having a higher than low bribery risk and expense/payment requests should be reviewed for red flags that indicate an inadequate business basis or pose excessive bribery risks.

XIII. DUE DILIGENCE

- 13.1. Due diligence must be performed when the Institution's bribery risk assessment has assessed more than a minimal risk of bribery in relation to:
- a) Certain categories of transactions, projects, or activities.
 - b) Existing or planned relationships with certain categories of business partners; or
 - c) Specific categories of employees in certain positions.
- 13.2. The Institution must assess the nature and extent of the risk of bribery in relation to transactions, projects, activities, business partners, and personnel belonging to these specific categories.
- 13.3. The bribery risk assessment must include any due diligence necessary to obtain sufficient information to analyze the risk of bribery.
- 13.4. Due diligence must be updated in accordance with the frequency established in the Due Diligence Subprocess available for consultation on the institutional portal, considering any changes and latest information that may be considered with respect to the legal or natural person subject to screening.

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XIV. FINANCIAL AND NON-FINANCIAL CONTROLS

- 14.1. The Reserve Bank and its Subsidiary Companies must implement the following:
- a) Financial controls that manage the risk of bribery in different processes, activities, or transactions defined as having a risk of bribery that is more than low.
 - b) Non-financial controls to manage bribery risk in organizational units responsible for: purchasing, operations, finance, projects, marketing, public relations, internal audit, business, human capital, legal, and regulatory affairs.

XV. IMPLEMENTATION OF ANTI-CORRUPTION AND ANTI-BRIBERY CONTROLS BY CONTROLLED ORGANIZATIONS AND BUSINESS PARTNERS

- 15.1. Banco de Reservas and its Subsidiary Companies must implement rules and processes which require all other organizational units or Subsidiary Companies over which it has control or any commercial relationship to do the following:
- a) Implement the Institution's anti-bribery management system.
 - b) Implement their own anti-bribery controls, in each case, only to the extent that it is reasonable and proportionate, in relation to the bribery risks faced by the controlled institutions, considering the bribery risk assessment conducted.
- 15.2. Banco de Reservas and its Subsidiary Companies must implement control processes in the case of business partners not controlled by the Institution for which the bribery risk assessment or due diligence has identified more than a low risk of bribery, and where anti-bribery controls implemented by business partners would help mitigate the relevant bribery risk, as follows:
- a) The Institution must verify whether the business partner has anti-bribery controls in place that manage the relevant risk of bribery.
 - b) The Institution must require the business partner to implement anti-bribery controls in relation to the transaction, project, or activity. This must be a factor considered when assessing the bribery risk of the relationship with this business partner and how the Institution manages such risks.

XVI. ACTIVITIES WITH BUSINESS PARTNERS

- 16.1. It is a violation of this policy to make corrupt payments through Subsidiary Companies, agents, intermediaries, business partners, contractors, or suppliers (individuals or

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organizations) of the Bank (“Associated Entities”) or to make any payment to a third party when there is reason to believe that all or part of the payment will be used for bribery.

- 16.2. The relationship with agents and other intermediaries must be documented in the entity's standard terms and conditions for appointment and must include compliance with the Policy and prohibit Associated Entities from making or receiving bribes on behalf of the Institution.
- 16.3. Compensation paid to Associated Entities must be appropriate and justifiable for the purpose of the legitimate services provided.
- 16.4. Associated Entities must be required to maintain adequate books and records available for inspection by the Institution, its auditors, and/or investigating authorities.

XVII. ACCEPTANCE AND GRANTING OF GIFTS

- 17.1. The Institution must implement processes designed to prevent the offering, giving, or acceptance of gifts, hospitality, donations, and similar benefits, where the offering, giving, or acceptance is or could be perceived as bribery.
- 17.2. The criteria established regarding the granting or acceptance of gifts and/or hospitality from a third party should be consulted in the Code of Ethics and Conduct for Employees of Banco de Reservas and Subsidiary Companies.

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

- 18.1. Banco de Reservas and its Subsidiary Companies must consider requests from governments (municipalities) and local organizations for the benefit of cultural activities and community development.
- 18.2. Requests for donations must be carefully reviewed to ensure that contributions and donations to foundations and other non-governmental entities are used for legal purposes, as set forth in this manual.
- 18.3. Requests must comply with the provisions of ISO 37001:2025 (Anti-Bribery Management System) regarding conducting due diligence in advance and avoiding making any charitable contributions, donations, sponsorships, or similar contributions unless they have been previously approved by the Administrative Committee or the relevant body.

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- 18.4. The Ethical Compliance Subcommittee must review reports on donations, sponsorships, or contributions and assess whether they comply with the provisions of the Anti-Corruption and Anti-Bribery Policy.

XIX. TRAVEL AND REPRESENTATION EXPENSES

- 19.1. Travel and entertainment expenses must be in line with the budget and approved without alteration of invoices and documents for reimbursement. Transparency and honesty must be always maintained.
- 19.2. Receipts and invoices must have accounting support and be reviewed by the organizational units responsible for financial control and auditing, as established in the Payment Administration Process.

XX. REPORTING POLICY VIOLATIONS

- 20.1. Employees, members of the Board of Directors, consultants, and contractors of the Bank and its Subsidiary Companies must comply with the Bank's commitment to conduct its business and affairs in a legal and ethical manner.
- 20.2. Any employee, member of the Board of Directors, consultant, or contractor of Banco de Reservas and its Subsidiary Companies who becomes aware of cases in which employees and related parties receive a request to participate in any act prohibited by these policies, or who becomes aware of any information suggesting that a violation of these policies has occurred or is about to occur, must report it to the Compliance Officer through the Ethics Line.
- 20.3. Banco de Reservas and its Subsidiary Companies aim to encourage openness and support anyone who raises genuine concerns in good faith under this manual, even if they are mistaken.
- 20.4. No employee, collaborator, member of the Board of Directors, consultant, or contractor of Banco de Reservas and Subsidiary Companies shall be investigated, demoted, sanctioned, or suffer other adverse consequences for refusing to participate in or allow a crime of bribery, for raising concerns, or for reporting possible irregularities, even if this may result in losing business or suffering a disadvantage.

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- 20.5. Banco de Reservas and its Subsidiary Companies have an Ethics Line through which reports of irregularities, violations of laws, rules, regulations, or corporate policies of the Bank must be made, in accordance with the procedures defined on the corporate website.
- 20.6. Retaliation against any person who raises a concern in good faith is prohibited.

XXI. INVESTIGATION AND DOCUMENTATION OF REPORTS

- 21.1. Any reports of requests to participate in a prohibited act or a possible violation of the Policy must be initially investigated by the Compliance Officer in coordination with General Audit. When the matter is considered potentially serious, it must be reported to the Ethical Compliance Subcommittee, the Audit Committee, and, where appropriate, the Chairperson of the Board of Directors or Management, as applicable, and the following guidelines must be followed:
- a) A written report of the investigation must be prepared in accordance with the procedures established on the Corporate Portal. The investigation must include all relevant facts, the individuals involved, and the times and dates.
 - b) The Audit Committee should instruct that a forensic or security investigation be conducted, as appropriate. The Ethical Compliance Subcommittee, through the Compliance Committee, and the Audit Committee should inform the Board of Directors or Management of the existence of an investigation.
 - c) The identity of a person filing a report should be kept confidential to the extent possible and only disclosed when necessary or as required by law or court order.
 - d) Once the investigation is complete, the persons engaged to conduct it should provide a written investigation report to the Ethical Compliance Subcommittee or other bodies that require knowledge of the case.
 - e) If any illegal, infringing, or other questionable ethical conduct is discovered, the Ethical Compliance Subcommittee shall cause corrective action to be taken as deemed appropriate by the Board of Directors or Management to achieve compliance with the Policy and applicable law, and to remedy any illegal, infringing, or other questionable conduct. The persons engaged to conduct the investigation shall prepare, or cause to be prepared, a written summary of the corrective actions taken.

XXII. MONITORING AND REVIEW

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- 22.1. The Vice President of Compliance must monitor the effectiveness and proper implementation of this Policy, considering its suitability, adequacy, and effectiveness. Any deficiencies identified must be corrected as soon as possible.
- 22.2. Internal control systems and processes must be subject to audits to ensure that they are effective in combating bribery and corruption.
- 22.3. Employees, members of the Board of Directors, consultants, and contractors of Banco de Reservas and its Subsidiary Companies are responsible for implementing this Policy and must ensure they follow the processes set forth in this document to report any suspected irregularities.
- 22.4. Employees, members of the Board of Directors, consultants, and contractors of Banco de Reservas and its subsidiary companies may suggest improvements to these policies through the Compliance Officer.

XXIII. STAFF SAFETY

- 23.1. The personal safety of employees and members of the Board of Directors of the Bank and its Subsidiary Companies must prevail in situations of risk, and all details must be reported to the Compliance Officer through the established channels.
- 23.2. Details of incidents involving reports of attempted or actual bribery, or violations of these policies, must be reported immediately through the Ethics Line to the Compliance Officer, using the established channels.

XXIV. CONCERNS ABOUT THIS POLICY

- 24.1. Any questions or concerns regarding corruption and bribery should be submitted to the **Anti-Bribery Management System Mailbox at buzonsgas@banreservas.com**

XXV. SOURCES OF CONSULTATION

1. Law 448-06 on Bribery in Trade and Investment.
2. ISO 37001:2025 International Standard for Anti-Bribery Management Systems.
3. OECD-UN Ethics and Anti-Corruption Guide.
4. The United Nations Global Pact: regarding the 10 universal principles related to human rights, labor, the environment, and the fight against corruption in its strategies and operations.
5. Ethics Line Policy of Banco de Reservas and Subsidiary Companies.
- 6. Ethics Line and Anti-Corruption Policy of Banco de Reservas and Subsidiary Companies.**

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XXVI. UPDATE HISTORY

Version	Approval reference	Change description
1	Twenty-fifth Resolution of the Board of Directors dated July 27, 2021	Creation of an Anti-Corruption Policy Manual, based on the results of the Anti-Bribery and Anti-Corruption Management Project conducted with the support of consultants from the firm BDO.
2	Eighteenth Resolution of the Board of Directors dated June 27, 2023	Updated after review by the Ethics Compliance Division Management and the consulting firm BDO Consulting, regarding: – Specify the commitment to develop an anti-bribery management system in accordance with best practices and focused on continuous improvement. – Revise the Awareness and Training section, considering the requirement to certify, through training, personnel in positions related to activities identified as having a risk of corruption according to the entity's risk matrix before December of each year, and to report the status of these certifications to the Ethical Compliance Subcommittee. – Include the performance of due diligence prior to granting donations and sponsorships.
		Modified for the purpose of addressing observations and Action Plan for TUV NORD Audit 2023 Anti-Corruption and Anti-Bribery Management System, as detailed below: a. Update the Glossary to include definitions of Corruption and Bribery

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3	Twenty-seventh Resolution of the Board of Directors dated 11/28/2023	Offense. Remove the term corrupt payments. b. Include a section on Roles and Responsibilities of the Anti-Bribery Management System (ABMS), with the aim of: – Align with the provisions of the Compliance Management Mandate. – Define the roles of Senior Management, the Compliance Officer, the Ethics Compliance Unit, the Board of Directors, and the Compliance Committee. – Establish the Compliance Committee as the governing body of the SGAS. – Establish the Compliance Officer's delegation to the Ethics Compliance Unit for the SGAS's functions. – Indicate Senior Management's responsibilities for reviewing SGAS results reports annually to ensure their appropriateness, adequacy, effectiveness, and continuous improvement, and for the Ethics Compliance Unit to share an excerpt of these reviews with senior management.
		Amendments to the Manual for the purposes of: 1. Changing the name of the document: Anti-Corruption Policy Manual of Banco de Reservas and Subsidiary Companies to “Anti-Bribery and Anti-Corruption Policy Manual of Banco de Reservas and Subsidiary Companies.” 2. Aligning with the update to ISO 37001:2025.

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4	Thirty-Ninth Resolution of the Board of Directors dated 12/08/2025	3. Updating the name from Transparency Line to Ethics Line. 4. Including responsibility for managing the inherent risks of bribery arising within the scope of their duties at the Bank and Subsidiary Companies. 5. Updating of roles and responsibilities, indicating that matters relating to Subsidiary Companies are defined in the internal documents of each controlled entity, in accordance with its organizational structure. 6. Indicating that in the section on Bribery Risk Assessment, the factors contained in section 4.1 of the ISO 37001:2025 standard apply. 7. Updating the mailbox for raising concerns 8. Standardization of organizational units, in accordance with the current structure.
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This translation is issued as per the interested party's request in Santo Domingo, National District, Capital of the Dominican Republic, on October 15, 2025.

Vera Rocio Martinez Lopez
Judicial Interpreter