

BB Americas Bank

Integrity & Anti-Corruption Program ***(Reputational Risk Management Policy)***

Scope: This document is intended to serve as a guide and not as a substitute for directives issued by a Bank staff member acting in a supervisory capacity. If there is any question as to whether one should follow the procedures described herein a supervisor must always be consulted.

BB Americas Bank Integrity & Anti-Corruption Program aims to prevent, detect and remedy practices of qualifying acts against national or foreign companies/banks practiced by an employee or third party in the self-interest or benefit of the Bank, as well as prevent, detect and punish harmful acts that may be brought by legal entities against the Bank's assets and which may affect BBAm's reputation.

The Integrity & Anti-Corruption Program complies with the United States laws and regulations, the main foreign anti-corruption best practices and is a guide to all employees to conduct processes, products and services in accordance with these laws and regulations.

The Program is a result of the BBAm's commitment to prevent against corruption, in accordance with its Code of Ethics Manual & Employee Handbook, the BSA AML OFAC Policy (*Anti-Money Laundering, Terrorist Financing & Corruption Policy*) and the Vendor Management Policies & Procedures. The Bank also establishes procedures and instructions to mitigate risks related to unethical behavior.

Since The Integrity & Anti-Corruption Program is an element of governance, it is aligned with the BBAm mission, vision and values, which contributes positively to the dissemination and promotion of good management practices and to maintain a sound, ethical and transparent corporate environment.

BB Americas Bank rejects and does not tolerate acts of corruption, bribery, extortion, fraud, money laundering and financing terrorism. Its products and services are developed to inhibit its use for illegal practices linked to money laundering, terrorism financing and corruption. The Bank values and consider maintain business relationship with third parties engaged in preventing acts of corruption. The Bank is committed to preventing and combating corruption, not only in its own corporate environment but in any other illegal activities. The Bank voluntarily engages in actions whose main purpose is to contribute to society and to contribute to the fight against all forms of corruption.

In order to emphasize its perspective against corruption, BBAm invests in training and internal communication regarding ethics and corruption prevention; provides appropriate internal and external channels for complaints; its contracts contain breach agreement that states it can be terminated in cases of corruption and/or any other act that are not in compliance with municipal, state or federal laws and regulations from the United States of America or any other country; discloses the main topics of its Code of Ethics, BSA AML OFAC Policy and Integrity & Anti-Corruption Program to third parties as well as publish them in its website (these entire policies are available for consultation upon request); and the bank also follows procedures for those who apply for sponsorships and donations (refer to the CRA Program).

The bank does not involve itself with philanthropy charitable giving on a large scale or philanthropic strategic processes in the community. The bank also does not involve itself with any type of philanthropic responsibilities or donations within



this realm, nor handles philanthropic endeavors for any customers or companies that they service.

No corporate payments may be made to any outside party, including any government official, political party, political candidate, or political official, for the purpose of securing business for the Bank. While it has been the Bank's practice to prohibit such payments, employees at all levels must be aware that under the Corrupt Practices Act of 1977, severe penalties may be imposed on individuals who violate these provisions of the Act, as well as upon the Bank. Also, no corporate donations may be made, under any circumstances, to any politicians or political parties.

Any kind of complaint about acts of corruption committed by third parties for the benefit or interest of the Bank as well as acts against the equity, principles and commitments assumed by the Bank are fully investigated by BB Americas Bank in accordance with the current legislation.