



ANTI-BRIBE AND ANTI-CORRUPTION POLICY

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1. PURPOSE

Banco Latinoamericano de Comercio Exterior, S.A. (together with its subsidiaries, “Bladex” or the “Bank”) is committed to running its business in accordance with applicable laws, regulations and standards and with the highest ethical standards, and this commitment has been expressed in the Code of Business Conduct and Ethics.

The purpose of this Anti-Bribery and Anti-Corruption Policy is to reiterate Bladex's commitment to full compliance by the Bank, its subsidiaries and affiliates and its officers, directors, workers and agents, with the Foreign Corrupt Practices Act (“FCPA”) of the United States of America ("USA"), and applicable and related regulations of the Republic of Panama and any other local Anti-Bribery and Anti-Corruption laws applicable to Bladex.

This Policy complements the Code of Ethics and all applicable laws and provides a guideline for compliance with the FCPA and Bank policies applicable to Bladex operations in all countries in which it has a physical presence or where it operates.

For the purposes of this Policy, a “Contractor” or “Supplier” is defined as a third party, an entity or individual that delivers - and receives payment for - services or goods related to any aspect of Bladex's operation (it includes consultants and subcontractors). A payment recipient is defined as a third party, individual, entity, organization, and/or

Government, or entity related to the Government, which receives a payment from Bladex, but does not provide services or goods in return.

2. SCOPE

This Policy is applicable to all Bladex Collaborators, including members of its Board of Directors, as well as Bank Contractors and Suppliers. The purpose of this Policy is to complement all applicable laws, rules, and other corporate policies. It is not intended to replace any local law.

3. DEFINITIONS

"Unlawful Payment Activity": Give any payment or any other object of value to any person, directly or indirectly through a third party or to a third party in exchange for something; or make the person act or omit acting in violation of a legal duty; or make the person abuse or misuse their position; or ensure an inappropriate advantage, contract or concession, for the benefit of Bladex or any other party.

"Corruption": The misuse of public power for private benefit, or the misuse of power granted for private benefit.

"Bribe": It is the offer, promise, or payment in cash, gifts, or even excessive entertainment, or incentive of any kind, offered or delivered to a person in a position of trust, to influence the views or conduct of that person, or to obtain an inappropriate advantage.

Corruption and Bribery can take several forms, including the delivery or acceptance of:

- Payments in cash;
- False "consulting" jobs or relationships;
- Political contributions;
- Charitable contributions;
- Social benefits; or
- Gifts, trips, hospitality, and reimbursement of expenses

4. POLICY REQUIREMENTS

Bladex Collaborators and agents are strictly prohibited from offering, paying, promising or authorizing Unlawful Payment Activities.

To promote compliance with anti-corruption laws from the US, Panama and other applicable jurisdictions, Bladex Collaborators shall not carry out any Unlawful Payment

Activity that is related to foreign officials, local officials, or any person who is conducting business in the public sector.

Also, Bladex books and records must correctly record both the amount and the written description and valid proof of all transactions. Bladex Collaborators must ensure that there is a reasonable relationship between the substance of a transaction and its description in the Bank's books and records.

Bladex is expected to establish detailed procedures and standards related to training, due diligence, transaction logging, and other areas, to implement the terms of this Policy. In particular, Bladex will establish standards and procedures for the following:

- The sponsorship of trips destined to the government or government officials;
- Direct and in-kind support for the government or government officials;
- Support in security for the application of the law by the State;
- Per diem for government officials;
- Contracts with third parties related to the government, including those that may interact with the government on behalf or benefit of Bladex;
- Recruitment of entities that are owned by the State;
- Meals, gifts, and entertainment for government officials;
- Charitable contributions and cultural donations to the government or government officials, or those entities related to them;
- Political contributions;

5. AUDITS

The audits carried out on the processes of Bladex and its subsidiaries, including transactions, operating units, management of suppliers, customers, employees, among others, will be carried out periodically to ensure compliance with the requirements of this Policy and the applicable procedures and guidelines. Audits may be performed internally by Bladex, or externally through contracted third parties. Audit reports will include action plans for performance improvement.

6. INTERACTION WITH OTHER CORPORATE POLICIES

Other Bladex policies and documents that are influenced by this Policy and that must be interpreted under it are:

- Code of Ethics,
- Code of Ethics and Conduct for Suppliers,
- Guidelines for the Management of the Ethical Line,

- Corporate Governance Manual,
- Guidelines for Reputational Risk Management
- Internal Control Policy,
- Fraud Prevention and Detection Policy,
- Fraud Prevention and Detection Program,
- Guidelines for Gifts, Invitations and Donations,
- Manual for the Prevention of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction,
- Know Your Customer and/or Last Beneficiary Manual.

7. NO EXCEPTIONS

There are no exceptions or authorization to deviate from this Policy.

8. DISCIPLINE

Any Collaborator or other individual subject to this Policy, who does not comply with the terms of this Policy, may be subject to disciplinary action. Any Collaborator who has direct knowledge about potential breaches of this Policy but does not report such potential breaches through the mechanisms available for it, will be subject to disciplinary action. Any Collaborator who misleads or hinders investigators who are making inquiries about potential breaches of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include the termination of the employment relationship.

Any Contractor or Supplier who does not comply with the terms of this Policy, who has knowledge of potential breaches of this Policy and who does not comply with informing the corresponding instances to Bladex, through the mechanisms available for it, regarding said potential breaches, or who misleads or hinders investigators who are making inquiries about potential breaches of this Policy, may see their contract reevaluated or terminated.

9. REFERENCES

The FCPA is located at: <http://www.justice.gov/criminal/fraud/fcpa/>