

ANTI-BRIBERY MANAGEMENT SYSTEM POLICY

1. OBJECTIVE

Provide policies and guidelines that all administrators, employees, business partners and/or interested parties of Banco Bolivariano C.A. must comply with to prevent, control and mitigate risks of bribery and corruption in its activities so that they continue to develop with the highest level of ethics, integrity and compliance with current legal regulations.

2. SCOPE

This policy is mandatory for administrators and collaborators in all activities carried out within Banco Bolivariano C.A. and, for any person or entity that maintains any relationship with the Bank and its actions represent a risk or responsibility for it or may directly or indirectly affect its reputation or good name.

For an effective implementation and operation of the ABMS, the Bank has considered the Code of Ethics and the Internal Labor Regulations that must be followed by all its employees, the Anti-Bribery Management System (ABMS) according to ISO 37001:2016 standard, policies, procedures and applicable standards that help prevent, control and manage risks related to bribery that may arise in the institution as well as with its stakeholders.

The Supplier Management process, in what corresponds to its selection, contracting, assessment and payment of invoices, is the scope defined for the Anti-Bribery Management System - ABMS.

3. DEVELOPMENT OF THE DOCUMENT

Banco Bolivariano C.A. has a firm commitment to legality and ethical principles that is manifested especially in anti-bribery and anti-corruption matters; therefore, it categorically rejects any corrupt practice and requires third parties, and assumes as its own, the responsibility of actively participating in the eradication and prevention of corruption.

The Anti-Bribery Management System ABMS has the following objectives:

- 1. Prevent, control and mitigate the risks of bribery and corruption.*
- 2. Promote an ethical culture in our collaborators and business partners.*
- 3. Encourage management of bribery concerns and/or allegations without fear of retaliation*
- 4. Ensure compliance with the principles of good governance and transparency*

The pillars of our anti-bribery policy are:

- 1. Our institutional values.*
- 2. Compliance with applicable anti-bribery laws and requirements.*
- 3. The continuous search for the improvement of the Anti-bribery Management System.*

Regulation:

Those of us who conform Banco Bolivariano C.A. provide financial services that respond to the needs of our clients with quality and efficiency, applying our institutional values in all the processes that we develop; therefore, we reject, prevent, and sanction any corrupt practice or unfair behavior that has as its purpose the obtaining of illegal advantages, undue or inappropriate for the entity, its administrators, and collaborators.

Define the role of the person in charge of the Compliance Function so that the ABMS works with independence, authority and transparency and ensure the application of controls.

Bank Responsibilities:

- Expressly prohibit any act of bribery and corruption, expressing the decision to prevent, detect and confront them; guaranteeing the establishment of the necessary means and channels for concerns to be expressed based on reasonable evidence, without fear of reprisals.*
- Define the role of the person in charge of the Compliance Function so that the ABMS works with independence, authority and transparency and ensure the application of controls.*
- Commit to continuous improvement of the ABMS, by complying with its requirements and applicable laws.*
- Encourage and recognize any communication of evidence or suspicion of violation of the law and the Code of Ethics of its officials, employees or persons linked to the institution and provide safe mechanisms and processes to guarantee the confidentiality of the concerns motivating them to expose the facts in as much detail as possible, committing to take all necessary actions within the scope of its powers to avoid any type of administrative reprisals against the person who raise the concern.*
- Maintain a system of disciplinary measures that can conclude with the termination of the labor or commercial relationship in accordance with the provisions of the Internal Labor Regulations, Code of Ethics, and other applicable regulations and subject to the rules of due process.*

Responsibilities of officials, collaborators or interested parties of the Bank:

- Commit to faithful compliance with national or international anti-bribery laws that are applicable to the Institution, as well as compliance with the requirements of the Anti-bribery Management System.*
- Seek continuous improvement of the ABMS Anti-Bribery Management System, detecting variations in the environment in which the Bank carries out its activities in order to turn threats into opportunities.*

1. GLOSSARY

- **Bribery:** Defined as the offer, promise, delivery, acceptance or solicitation of 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 law applicable, as an inducement or reward for a person to act or refrain from acting in connection with the performance of that person's duties.
- **ISO 37001:** It is the international standard designed to help organizations implement an anti-bribery management system. It specifies a series of measures that the organization can implement to help prevent, detect and deal with bribery.
- **ABMS:** Anti-bribery Management System.
- **Due Diligence:** Process to further assess the nature and extent of bribery risk and to help organizations make decisions regarding specific transactions, projects, activities, business partners and personnel.
- **Bribery concerns or allegations:** Involves reporting in good faith or on the basis of reasonable belief, the alleged or actual bribery attempt, or any violation or weakness in the ESMS, to the anti-bribery compliance function.
- **Conflict of interest:** Situation where business, financial, family, political or personal interests could interfere with the value judgment of personnel in the performance of their obligations to the organization.

2. REFERENCE DOCUMENTS

- Code of Ethics of Banco Bolivariano C.A.
- Code of Conduct for Suppliers of Banco Bolivariano C.A.
- Internal Work Regulations of Banco Bolivariano C.A.
- Anti-Bribery Management System (ABMS) according to ISO 37001:2016.
- Supplier Management: Policies, procedures and controls.

3. ANNEXES

Does not apply

CHANGE CONTROL

VERSION	DESCRIPTION OF THE CHANGE	DATE OF CHANGE	APPROVED
1	Preparation of the Policy document for the Anti-bribery Management System	October/2021	Executive vice-president