

I, ANA LUCIA MATAMBA HERNANDEZ, Certified Legal Translator, authorized by the laws of the Republic of Guatemala to translate documents from Spanish into English and vice versa, in and for said Republic, according to Ministerial Agreement number 1748, Registry number 443-10-05, issued by the Ministry of Education in October 2005, DO HEREBY CERTIFY AND SWEAR to have at sight THE ANTI-BRIBERY MANAGEMENT SYSTEM POLICY OF EL CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA, which is written in Spanish, and duly translated into English only in its relevant parts to the best of my ability and knowledge, reads as follows: -----

**“[ANTI-BRIBERY MANAGEMENT SYSTEM POLICY OF EL CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA] -----**

BANCO CHN - CRÉDITO HIPOTECARIO NACIONAL -----

ANTI-BRIBERY MANAGEMENT SYSTEM POLICY OF EL CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA -----

Reference to ISO 37001 Standard, Version 2016 -----

Code: POL-UACN-001 - Version: 01 - Page 1 of 5 - Date: September 2023 -----

**Introduction -----**

This Anti-Bribery Policy reflects that El Crédito is permanently committed to the development of our activities with the highest level of ethics, integrity, transparency and compliance with the internal and external regulations in force. -----

At El Crédito we are firmly committed to combating bribery in any of its forms, by establishing principles, policies and procedures that guide the behavior of all our stakeholders (Directors, Authorities, Officers, Employees, Customers, Suppliers, Representatives and/or persons acting in an authorized manner in the name or on behalf of El Crédito and its Affiliated Departments). -----

**1. Objectives -----**

In order to manage the risk of bribery in El Crédito Hipotecario Nacional de Guatemala, hereinafter referred to indistinctly as El Crédito or the Institution, and its Affiliated Departments, the Anti-Bribery Management Policy of El Crédito is established, which has a risk management approach. -----

This Anti-Bribery Management Policy of El Crédito, hereinafter referred to as the Policy, describes in general terms the Anti-Bribery Management System, with the purpose of preventing and mitigating the risk of bribery to which the Institution is exposed. -----

**2. Scope of Application.** The policy is applicable to all our stakeholders (Directors, Authorities, Officers, Employees, Customers, Suppliers, Representatives and/or persons acting in an authorized manner in the name or on behalf of El Crédito and its Affiliated Departments). -----

**3. Applicable regulations. -----**

**3.1** Political Constitution of the Republic of Guatemala; -----

**3.2** Decree Number 1441 of the Congress of the Republic of Guatemala, Labor Code; -----

  
Ana Lucía Matamba  
TRADUCTORA JURADA  
INGLÉS-ESPAÑOL  
Acuerdo 1748.  
Diciembre 2005

3.3 Decree Number 14-72 of the Congress of the Republic of Guatemala, National Department of Child Savings, Juan José Orozco Posadas; -----

3.4 Decree Number 25-79 of the Congress of the Republic of Guatemala, Organic Law of the Crédito Hipotecario Nacional de Guatemala, and its amendments; -----

3.5 Decree Number 67-2001 of the Congress of the Republic of Guatemala, Anti-Money and Asset Laundering Law and its Regulations contained in Governmental Agreement Number 118-2002 and its amendments. -----

*[there appear four round seals, each one of them with an illegible signature, and from left to right, they read as follows:]* -----

1. Crédito Hipotecario Nacional de Guatemala - Risk Management Administration - Manager -----

2. Crédito Hipotecario Nacional de Guatemala - Legal Counsel Manager -----

3. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Senior Analyst - UACN I -----

4. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Coordinator -----

BANCO CHN - CRÉDITO HIPOTECARIO NACIONAL -----

ANTI-BRIBERY MANAGEMENT SYSTEM POLICY OF EL CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA -----

Reference to ISO 37001 Standard, Version 2016 -----

Code: POL-UACN-001 - Version: 01 - Page 2 of 5 - Date: September 2023 -----

3.6 Decree Number 18-2002 of the Congress of the Republic of Guatemala, Financial Supervision Law; -

3.7 Decree Number 19-2002 of the Congress of the Republic of Guatemala, Law on Banks and Financial Financial Groups, and its amendments; -----

3.8 Decree Number 89-2002 of the Congress of the Republic of Guatemala, Law of Probity and Responsibilities of Public Officials and Employees; -----

3.9 Decree Number 58-2005 of the Congress of the Republic of Guatemala, Law to Prevent and Suppress the Financing of Terrorism and its Regulations contained in Governmental Agreement Number 86--2006; -----

3.10 Decree Number 25-2010 of the Congress of the Republic of Guatemala, Law of the Insurance Activity; -----

3.11 Decree Number 31-2012 of the Congress of the Republic of Guatemala, Law Against Corruption; --

3.12 Governmental Decree 1236 of the Congress of the Republic of Guatemala, Regulatory Law of the Deposit Warehouses of Crédito Hipotecario Nacional de Guatemala; -----

  
Ana Lucía Matamba  
TRADUCTORA JURADA  
INGLÉS-ESPAÑOL  
Acuerdo 1748.  
Reritefo, 4433-10-05

- 3.13 Governmental Decree 1986, Organic Law of the Bonding Department of El Crédito Hipotecario Nacional de Guatemala; -----
  - 3.14 Governmental Decree 2956, Organic Law of the Insurance and Social Security Department of El Crédito Hipotecario Nacional de Guatemala; -----
  - 3.15 Governmental Decree 92-73 of the Congress of the Republic of Guatemala, Organic Law of the Department of Monte de Piedad del Crédito Hipotecario Nacional de Guatemala; -----
  - 3.16 Governmental Agreement Number 547-86, Regulation of the Personnel Regime of El Crédito Hipotecario Nacional de Guatemala; -----
  - 3.17 Monetary Board Resolution JM-56-2011, Regulation for Integral Risk Management; -----
  - 3.18 Monetary Board Resolution JA-62-2016, Corporate Governance Regulation and its amendments; --
  - 3.19 Monetary Board Resolution JM-3-2018, Corporate Governance Regulations for Insurers and Reinsurers; -----
  - 3.20 Comprehensive Risk Management Manual of El Crédito Hipotecario Nacional de Guatemala; -----
  - 3.21 Corporate Governance Manual of El Crédito Hipotecario Nacional de Guatemala; -----
  - 3.22 Collective Agreement on Working Conditions entered into between El Crédito Hipotecario Nacional de Guatemala and The Workers' Union of El Crédito Hipotecario Nacional de Guatemala; ----
  - 3.23 Code of Ethics and Conduct of El Crédito Hipotecario Nacional de Guatemala; -----
  - 3.24 Conflict of Interest Regulations of El Crédito Hipotecario Nacional de Guatemala; -----
  - 3.25 Code of Ethics and Conduct of the Suppliers of El Crédito Hipotecario Nacional de Guatemala; ----
- [there appear four round seals, each one of them with an illegible signature, and from left to right, they read as follows:]* -----
1. Crédito Hipotecario Nacional de Guatemala - Risk Management Administration - Manager -----
  2. Crédito Hipotecario Nacional de Guatemala - Legal Counsel Manager -----
  3. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Senior Analyst - UACN I -----
  4. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Coordinator -----
- BANCO CHN - CRÉDITO HIPOTECARIO NACIONAL -----
- ANTI-BRIBERY MANAGEMENT SYSTEM POLICY OF EL CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA -----
- Reference to ISO 37001 Standard, Version 2016 -----
- Code: POL-UACN-001 - Version: 01 - Page 3 of 5 - Date: September 2023 -----
- 3.26 Ethics and Transparency Policy of El Credito Hipotecario Nacional de Guatemala; -----

  
 Ana Lucía Matamba  
 TRADUCTORA JURADA  
 INGLÉS-ESPAÑOL  
 Acuerdo 1748.  
 Registro 443-10-05

- 3.27 Anti-Bribery Management System Manual of El Crédito Hipotecario Nacional de Guatemala; -----
- 3.28 Manuals for the Prevention of Laundering of Money or Other Assets and Financing of Terrorism of El Crédito Hipotecario Nacional de Guatemala and its Affiliated Departments; and, -----
- 3.29 Other applicable laws and provisions of the legal system. -----

**4. Prohibitions.** -----  
 We expressly prohibit bribery in any form, direct or indirect, in relation to a public official or body or a private person or organization, as well as any type of behavior or action that may involve a violation of the laws in force regarding bribery. -----

**5. Continuous Improvement.** -----  
 This Policy shall be updated at least once a year or when necessary, the updating and communication shall be the responsibility of the Compliance Management Unit. The Board of Directors, Audit Committee and General Management shall ensure and promote continuous improvement in the Anti-Bribery Management System. -----

**6. Legal Compliance** -----  
 For the development of our anti-bribery management system, we have considered as a starting point the requirements of the ISO 37001:2016 standard, the laws and regulations in force, which include the current ones regarding the prevention of bribery and corruption that apply to the institution in the development of its activities. -----

**7. Functions in the Anti-Bribery Management System.** -----  
 For the maximum guarantee of independence, we have designated a specific position within our organization chart, called the Regulatory Compliance Administrative Unit, endowed with capacity, autonomy, independence and authority, which, reporting directly to the Board of Directors and Audit Committee, ensures the correct design, implementation, monitoring and improvement of our Anti-Bribery Management System. The Regulatory Compliance Administrative Unit is at the disposal of all members of our Institution to advise, guide and support them in matters of ethical behavior and compliance. -----

*[there appear four round seals, each one of them with an illegible signature, and from left to right, they read as follows:]* -----

- 1. Crédito Hipotecario Nacional de Guatemala - Risk Management Administration - Manager -----
- 2. Crédito Hipotecario Nacional de Guatemala - Legal Counsel Manager -----
- 3. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Senior Analyst - UACN I -----
- 4. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit -

  
 Ana Lucía Matamba  
 TRADUCTORA JURADA  
 INGLÉS-ESPAÑOL  
 Acuerdo 1748.  
 Registro 443-10-05

Coordinator -----  
BANCO CHN - CRÉDITO HIPOTECARIO NACIONAL -----  
ANTI-BRIBERY MANAGEMENT SYSTEM POLICY OF EL CRÉDITO HIPOTECARIO NACIONAL DE  
GUATEMALA -----  
Reference to ISO 37001 Standard, Version 2016 -----  
Code: POL-UACN-001 - Version: 01 - Page 4 of 5 - Date: September 2023 -----

**8. Consequences of Non-Compliances and Non-Conformities of the Anti-Bribery Management System** -----

We have a Code of Ethics and Conduct in force and approved: as well as the Regulations of the Personnel Regime of El Crédito Hipotecario Nacional de Guatemala and the Collective Agreement on Working Conditions, which detail the disciplinary consequences for non-compliance, apply to all employees of El Crédito, without prejudice to the legal consequences that may fall on it for those acts, facts or behaviors that involve a violation of the law. In this regard, we have a system for sanctioning conduct contrary to the provisions of this Policy, current legal regulations, as well as the other requirements of our Anti-Bribery Management System. -----

All members of our stakeholders (Directors, Authorities, Officials, Employees, Customers and/or Suppliers, representatives and/or persons acting in an authorized manner on behalf of El Crédito), have the obligation to inform and/or report any action, conduct, information or evidence that is susceptible or suspicious of violating our Anti-Bribery Management System of the Institution and that may involve criminal conduct by action or omission. -----

**9. Anti-Bribery Risk Assessment** -----

At El Crédito we periodically identify and evaluate the bribery risks to which our activities are exposed, documenting the results in the Risk Matrix. -----

We establish control plans for our risks, analyzed and evaluated above moderate, with the clear objective of preventing and reducing their probability of occurrence, as well as to establish monitoring and control mechanisms. And as part of the internal and external mechanisms for evaluating the effectiveness of our Anti-Bribery Management System, we have established control and supervision measures, committing ourselves to continuous improvement in order to create an authentic system that adapts to changing market circumstances, improvements and opportunities or failures detected. -----

**10. Raising Concerns (Allegations of Bribery)** -----

We have established means of communication so that any person may report any type of suspicious act or conduct, or may raise any type of doubt or query in this regard, through our Ethics and Transparency Line. -----

  
Ana Lucia Matamba  
TRADUCTORA JURADA  
INGLÉS-ESPAÑOL  
Acuerdo 1748.  
Registro 443-10-05

[there appear four round seals, each one of them with an illegible signature, and from left to right, they read as follows:] -----

1. Crédito Hipotecario Nacional de Guatemala - Risk Management Administration - Manager -----

2. Crédito Hipotecario Nacional de Guatemala - Legal Counsel Manager -----

3. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Senior Analyst - UACN I -----

4. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Coordinator -----

BANCO CHN - CRÉDITO HIPOTECARIO NACIONAL -----

ANTI-BRIBERY MANAGEMENT SYSTEM POLICY OF EL CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA -----

Reference to ISO 37001 Standard, Version 2016 -----

Code: POL-UACN-001 - Version: 01 - Page 5 of 5 - Date: September 2023 -----

Therefore, we value positively and strongly encourage the communication of any indication or suspicion of violation of the law by any member, person or organization linked to our Institution, so we appreciate the greatest possible detail in the presentation of the facts reported/communicated. -----

Our Institution has put in place secure internal mechanisms and processes to guarantee the confidentiality of the reports and communications received, as well as to protect from any type of threat or coercion the people who participate in our objective of fighting against bribery through communication and reporting. -----

**11. Communication of the Policy.** -----

The dissemination of the policy will contribute to the culture of anti-bribery compliance at the Institutional level and the Compliance Administrative Unit will be responsible for communicating it by the means it deems appropriate. -----

**12. Cases Not foreseen** -----

Cases not foreseen in this policy will be resolved by the Board of Directors of El Crédito Hipotecario Nacional de Guatemala. -----

**13. Final Provisions** -----

The Board of Directors has approved the Policy, resources and mechanisms necessary for the proper implementation of an Anti-Bribery Management System aligned with the requirements of the international standard ISO 37001:2016 and the current legislation that applies to bribery in the development of activities, in order to prevent, control and manage any risk of bribery to which our Institution may be exposed. -----

  
Ana Lucía Matamba  
TRADUCTORA JURADA  
INGLÉS-ESPAÑOL  
Acuerdo 1748.  
Registro 443-10-05

[there appear four round seals, each one of them with an illegible signature, and from left to right, they read as follows:] -----

1. Crédito Hipotecario Nacional de Guatemala - Risk Management Administration - Manager -----
2. Crédito Hipotecario Nacional de Guatemala - Legal Counsel Manager -----
3. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Senior Analyst - UACN I -----
4. Crédito Hipotecario Nacional de Guatemala - Regulatory Compliance Administrative Unit - Coordinator."

**IN WITNESS WHEREOF**, at the request of the interested party, for the legal uses such party may deem convenient and without assuming any responsibility whatsoever for the contents of the original document, I hereby set my hand and affix my seal in this **CERTIFIED LEGAL TRANSLATION** written on seven sheets of plain paper, in the City of Guatemala, on December eleven, two thousand twenty three.

  
Ana Lucía Matamba  
TRADUCTORA JURADA  
INGLÉS-ESPAÑOL  
Acuerdo 1748.  
Registro 443-10-05