

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 CODE OF ETHICS AND CONDUCT FOR SUPPLIERS OF 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: -----

“[THE CODE OF ETHICS AND CONDUCT FOR SUPPLIERS OF CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA] -----

Date: September 2023 -----

BANCO CHN - CRÉDITO HIPOTECARIO NACIONAL -----

THE CODE OF ETHICS AND CONDUCT FOR SUPPLIERS OF CRÉDITO HIPOTECARIO NACIONAL DE GUATEMALA -----

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

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

Operating in the domestic and international market, especially when business is conducted in different cultural environments, requires transparent standards and compliance with the provisions of various legislations, ensuring competitiveness. -----

At El Crédito we are fully committed to safeguarding our reputation and credibility and the ethical principles that guide our actions and the way in which we conduct our business, so we work to maintain our image as a solid, ethical and reliable entity, in full compliance with the internal and external regulations that apply to El Crédito and its Affiliated Departments. -----

Suppliers are fundamental in our value chain, making it essential for both of us to commit to transparent processes in any purchasing modality, thus we must share our values and principles and guide our suppliers in terms of compliance, ethics and transparency; therefore, we define this Code and share it with them, expecting them to act according to a rigid compliance with both internal and external rules that affect them, especially in the contractual relationships they maintain with El Crédito. -----

The ethical standards of this Code are closely linked to our corporate vision, strategy and values that provide guidance to all our suppliers, customers, employees, agents, contractors, subcontractors, representatives, investors and other business partners that act on behalf of El Crédito or are linked to our Institution. -----

This Code may be updated or modified; therefore, we are committed to regularly review and update our

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applicable regulations. In that case, we will promptly communicate the changes to our suppliers. -----

The objective of compliance with this Code is that our Institution's suppliers comply with all internal and external regulations, regardless of whether or not they are expressly mentioned in this document. -----

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1. Purpose -----

The purpose of this Code of Ethics and Conduct for Suppliers of El Crédito Hipotecario de Guatemala, hereinafter referred to as The Code, is to provide guidelines so that the Suppliers of El Crédito and its Affiliated Departments, know and behave with values in the performance of their commercial activities in search of continuous improvement based on ethics and transparency, reflecting and preserving the high standards of conduct that have been and are part of the culture and way of doing business of El Crédito Hipotecario Nacional de Guatemala. -----

2. Scope of application -----

The Code is of general observance and mandatory compliance for suppliers, contractors and subcontractors of El Crédito and its Affiliated Departments. -----

For the application of The Code, suppliers, contractors and subcontractors shall be understood as the successful bidders of the processes of the different purchasing modalities, who have complied with the requirements set forth in Decree number 57-92 of the Congress of the Republic, Law of State Contracting, Regulations and its amendments; as well as what is established in the Regulations for Acquisitions and Contracting of El Crédito Hipotecario Nacional de Guatemala. -----

3. Mission, Vision and Values -----

The fundamental corporate culture and values published on the El Crédito website are applicable to the


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Institution's suppliers and are based on the institutional mission, vision and values detailed as follows: ----

Mission: We are a financial institution with the unconditional and unlimited guarantee of the State, which since 1930 has contributed to the economic and social development of the country by offering a comprehensive portfolio of financial products and services. -----

Vision: To be a solid, reliable, helpful, competitive and innovative financial institution that provides high quality multiple banking products and services, in order to effectively contribute to the development of the social and productive sectors of the country. -----

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Values: These are the values that El Crédito observes and transmits to its employees and workers at all levels: -----

1. **Honesty:** I am transparent, I tell the truth, I am honest and I work with care, honesty and clarity; I do not hide anything, nor do I take what does not belong to me. -----
2. **Responsibility:** I work with diligence and conviction to guarantee the correct fulfillment of my obligations, thus contributing to generate trust in the Institution's clients. -----
3. **Loyalty:** I am committed to El Crédito and my constant gratitude and hard work contribute to the achievement of our institutional mission and vision. -----
4. **Respect:** I treat everyone with the same consideration with which I would like to be treated; I am cordial, polite, helpful and attentive. -----
5. **Hard work:** Dedication and effort in my work contribute to my personal development and to the enhancement of my Institution and my country. -----

4. Principles of the Code of Conduct to Suppliers -----


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4.1 Compliance with Laws -----

El Crédito is committed to complying with the laws and regulations that affect our Institution and the way in which we do business, and we expect our suppliers to do the same, especially with respect to their contractual relationships with El Crédito. -----

We also uphold the highest standards of ethics and compliance with the law and encourage those who act on our behalf or interact with us to do the same. -----

4.2 Business integrity and prevention of corruption -----

We must all respect the rights of our customers, suppliers and competitors and relate to them in a fair manner. In this sense, we believe that our suppliers must ensure meritocracy and fair competition in the markets and adopt, in the exercise of their activities (especially in relation to contractual relations) with El Crédito, an honest conduct, in strict compliance with the applicable laws. -----

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Specifically, at El Crédito we do not admit any practice related to corruption. Our suppliers are **prohibited** from promising, offering, authorizing or giving, directly or indirectly, any payment or undue advantage to workers or public officials and/or persons in the private sector or third parties related to the above, in order to influence any act or decision to promote their own interests or those of El Crédito. -----

Suppliers are responsible for the damages generated by the practices and acts of their business partners and that fall or may fall on El Crédito. For this reason, our suppliers must also ensure the correct selection of their business partners. -----

4.3 Gifts, Hospitality and Similar benefits -----


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At El Crédito we have zero tolerance for bribery and are committed to acting professionally, impartially and with integrity in all our activities, wherever we operate. -----

For the purposes of this Code, "gift" or " present" means any kind of attention, favor or compensation, whether in cash or in kind, given or received by an employee, officer, authority or manager, either from El Crédito or from our Suppliers. They shall not offer, accept or solicit gifts, entertainment or hospitality that could be considered as improperly influencing decisions or impairing the objectivity of their business. -----

Our employees, officers, officials, authorities or directors must not solicit gifts, presents, courtesies or other benefits on behalf of El Crédito or in connection with any activity or contractual relationship with El Crédito. -----

Gifts and donations of promotional material will be received as a token of -----
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courtesy and not as a commitment to present or future decisions. -----

4.4 Prevention of Laundering of Money or Other Assets and Financing of Terrorism -----

El Crédito complies with the legal provisions to prevent the laundering of money or other assets and the financing of terrorism and we audit our activities in this area, having determined not to establish relationships with persons or entities that do not comply with the aforementioned legislation or that do not provide adequate information regarding compliance with it. -----

In this way, we demand full compliance by our suppliers with the applicable regulations, taking the corresponding measures in this area to avoid possible non-compliance. -----

4.5 Confidentiality of information -----

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All matters related to El Crédito must be treated by our suppliers or business partners with confidentiality, secrecy and protection of intellectual property rights. -----

The protection of confidential information is critical to the success of El Crédito and our business relationships with our suppliers, including confidential information about our suppliers, our Board of Directors, officers, employees, and customers. Access to El Crédito's information must be limited to those persons strictly necessary, and its use must be limited to the specific purpose of supplying goods or providing the service. -----

Information assets with respect to which this confidentiality protection must be maintained may include, for example: -----

- Customer data and their product requirements -----
- Patents, trademarks, licenses and other types of intellectual property -----
- Financial data not publicly available -----
- Pricing and sales strategies -----

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- The terms of the agreements entered into with El Crédito previously made public in electronic system. -----
- Operational strategies -----

Suppliers are **prohibited** from using El Crédito's goods or information to obtain undue personal benefits, as well as from using, for illicit purposes, El Crédito's assets within their reach during the contractual relationship. -----

5. Labor Practices -----

At El Crédito we respect and promote good labor practices in our activities and in commercial working


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relationships. In our Institution we only accept the establishment of commercial relationships with suppliers that respect and observe the labor legislation and the principles and values listed throughout this section. -----

We also require our suppliers to strictly comply with the labor laws of the places where they operate and to observe the collective agreements and conventions in force. -----

Therefore, we do not tolerate, allow or agree with forced labor, with degrading conditions that go against labor legislation. For these reasons, El Crédito will not sign or maintain commercial relations with those who use irregular and/or illegal practices. -----

5.1 Occupational Health and Safety -----

Our suppliers must make a fundamental commitment to protect the health and safety of employees and the communities in which they operate and to take all necessary measures to prevent workplace-related injuries and illnesses. -----

For this reason, the workplaces in which they operate must comply with all relevant occupational health and safety standards and be free from recognized hazards that could cause injury, illness or death to persons performing their duties in those areas. -----

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5.1 Equal employment opportunity and prohibition of discrimination -----

At El Crédito we require no tolerance for discrimination on the basis of color, ethnicity, religion or belief, age, gender, disability, nationality, social class, physical characteristics, marital status, political conviction, union membership or any other status protected by applicable laws. -----

All workers have the right to work and participate in employer-sponsored activities in an environment


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free from harassment, victimization, hostility and intimidation. -----
At El Crédito, we demand respect for people's individual rights in terms of political and union participation. Thus, our suppliers must recognize and respect the freedom of association of their own members. -----

6. Questions and Concerns -----

Should you have any questions, dilemmas or concerns regarding this Code or its application or interpretation we will be pleased to assist you through our contacts, please contact the person who referred you to this Code. -----

7. Actions to be taken in case of questions or complaints -----

If you become aware of possible violations of this Code or the Institution's policies and/or the commission of any crime in the course of your relationship with El Crédito, you should report it immediately. -----

To this end, we have established an **Ethics and Transparency Hotline** (Whistleblower Channel) that allows for the confidential submission of bona fide complaints. -----

8. Final provisions -----

As a final result, a document has been obtained that dictates the most appropriate principles and guidelines in accordance with the characteristics, nature, size and complexity of the operations carried out by El Crédito and its Affiliated Departments with its suppliers, so that these constitute a real stimulus to promote the commitment to corporate governance in search of continuous improvement and the promotion of a culture based on ethics and transparency throughout the Institution, i.e., the Bank and its Affiliated Departments. -----

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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 nine sheets of plain paper, in the City of Guatemala, on December eleven, two thousand twenty three.


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