INTELIGO BANK

Ethics and Compliance Policy

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www.inteligobank.com

I. Introduction

At Inteligo Bank, we act with integrity. We are committed to working with the highest ethical and compliance standards, aligned with our mission and vision. Our efforts are focused on applying international best practices and complying with regulatory obligations in the jurisdictions where we operate. This allows us to strengthen relationships with our stakeholders and protect our reputation.

In this regard, the purpose of this Policy is to lay the foundations and define the scope of the Ethics and Compliance Program of Inteligo Bank Ltd. (the "Program").

II. Regulatory Basis

The Program has been developed based on the rules and principles established by our regulatory bodies: the Central Bank of The Bahamas, the Superintendency of Banks of Panama, Securities Commission of The Bahamas and the Superintendency of the Securities Market of Panamá.

In addition, our programs incorporate international industry standards such as the recommendations of the Financial Action Task Force (FATF), standards for private banking issued by the Wolfsberg Group, and standards issued by the Basel Committee, among others.

III. Code of Ethics

Our Code of Ethics, as a fundamental pillar of the Program, establishes and promotes the behaviors expected of our directors, employees, suppliers, and other stakeholders. It contains the values and principles that guide our decisions and actions on a day-to-day basis and reflects our commitment to integrity.

IV. Our Program

The purpose of our Program is to ensure compliance with ethical and regulatory standards, under a risk-based approach, in line with the industry, size and complexity in the different jurisdictions where we operate.

The Program includes the following mechanisms for prevention, detection and response:

1. Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT)

This program aims to manage the risk of being used directly or through third parties as an instrument for money laundering and/or financing of terrorism. It is composed of the following:

- A policy and manual
- Methodology for the assessment of client risks

- Know-your-customer procedures covering up to the beneficial owner
- Procedures for monitoring clients and quality assessment of controls
- Procedures for knowledge and monitoring of directors, employees, suppliers, and counterparties
- Regular training and communications
- Whistleblowing channels
- Suspicious Transaction Reporting to the competent authorities
- Independent audits
- Action, remediation and continuous improvement plans

2. Anti-Corruption and/or Crime Prevention

This program aims to manage the risk of incurring in acts of corruption, as well as to safeguard our reputation. In this regard, we have defined a zero-tolerance policy for acts of corruption.

The program is composed of:

- A policy and manual
- Guidelines for the management of hospitality and gifts, interaction with public officials and management of donations and contributions to political campaigns.
- Methodology for the assessment of corruption risks
- Procedures for knowledge about directors, employees, clients, customers, suppliers, and third parties
- Procedures for monitoring and quality assessment of controls
- Regular training and communications
- Whistleblowing channels
- Independent audits
- Action, remediation and continuous improvement plans

At Inteligo Bank Ltd. it is forbidden to make political contributions and/or be made by managers and employees on behalf of companies.

3. Regulatory Compliance

This program aims to ensure compliance with internal policies and external regulations and standards applicable to Inteligo Bank Ltd. and to mitigate the risk of penalties for non-compliance, as well as to safeguard our reputation.

The program is composed of:

- A policy and manual
- Methodology for the assessment of regulatory compliance risks
- Procedures for identifying, disseminating and monitoring applicable regulations
- Monitoring and quality assessment of compliance with regulations
- Regular training and communications
- Internal and external audits
- Action, remediation and continuous improvement plans
- Whistleblowing channels

4. Conflicts of Interest and Inside Information

Our goal is to prevent and manage conflicts of interest that may arise as a result of the activities of IFS and its subsidiaries. In this regard:

- We have policies and guidelines regarding conflicts of interest and inside information
- Our selection processes for employees and suppliers are carried out under objective criteria based on meritocracy.
- We regulate the giving and receiving of gifts and/or hospitality in a way that ensures objective decision-making.
- We promote the protection of our investors by regulating the trading of securities of IFS and its subsidiaries by people that have access to inside information.
- We use inside information only for the exercise of our corporate functions.

5. Fiscal Transparency

We are committed to complying with the tax regulations applicable to each jurisdiction in which we operate. In this regard:

- We declare, report, and present tax information in a complete, accurate, timely, and lawful manner.
- We present and record our financial statements in accordance with local and international standards as applicable.
- We deal with suppliers that comply with tax regulations and are fiscally compliant.

6. Human Rights

We respect and promote human rights in line with international standards. Our policies reflect international agreements and principles, such as the United Nations Global Compact, the International Bill of Human Rights and the Declaration of the International Labor Organization (ILO), and are applicable to the directors and employees of Inteligo Bank Ltd. In addition, the practices of suppliers, clients and other stakeholders must be consistent with these policies.

At Inteligo Bank Ltd., we are committed to respecting and promoting human rights in accordance with applicable laws in the jurisdictions where we operate.

7. Whistleblowing Channel

All our directors, employees, clients, and third parties have at their disposal a whistleblowing channel that allows them to anonymously report breaches or suspected breaches of the Code of Ethics and/or our internal policies, as well as any behavior that goes against the values we promote. To safeguard the integrity of whistleblowers, anonymous reports are accepted, we have a "Zero Retaliation" policy, and the channel is managed by a third party.