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# ANTI-BRIBERY POLICY

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APPROVED BY:	RICHARD MARTINEZ	MINISTER OF ECONOMY AND FINANCE

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## 1. INTRODUCTION

This **Anti-bribery Policy** reflects that our institution permanently maintains and displays a high commitment to carrying out its activities within the framework of its powers with the highest level of ethics and compliance with current legislation.

*At the Ministry of Economy and Finance, we are committed to combating bribery by establishing policies and guidelines that guide the behavior of all our workers and public and private third parties who have a contractual or any other relationship with the Ministry of Economy and Finance.*

In this context, the Ministry of Economy and Finance (MEF) has created the necessary norms and organizational structure for the proper implementation and operation of the Anti-bribery Management System, hereinafter **SISGAS**, aimed at preventing, controlling and managing any possible risk of bribery to which the institution is exposed in its internal functioning, and in its relationship with the interested parties.

## 2. SCOPE OF APPLICATION, REACH, AND OBJECTIVES

This Anti-bribery Policy is applicable to the MEF, in carrying out its "**TRANSFER OF RESOURCES**" service, including all the processes necessary for its operation.


The scope of application extends to all the public servants of the MEF who participate in carrying out the "*Transfer of resources*" service, and to all other public institutions, business partners, public servants, private companies, citizens, national and international organizations, and delegations with which it interacts in the execution of the aforementioned service, i.e. the **interested parties**, in order to prevent acts of bribery.

For the development of this Anti-bribery Policy and of the **SISGAS** of the MEF, we have taken into consideration the requirements established by the **ISO 37001:2016** standard and the current legal framework regarding compliance and prevention of bribery and corruption that apply to our institution in carrying out its activities, of which a strict observance is demanded.

Our **SISGAS** is subject to periodic evaluations and reviews and contains detailed objectives, which are available for consultation upon request and are summarized as follows:

- Evaluate the bribery risks to which our institution is subject.
- Define the control plans to manage the prioritized risks.
- Prevent actions or behaviors contrary to the current legal framework or to institutional policies and norms.

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- Train and sensitize all public servants of the MEF, business partners, and related parties about the relevant aspects of the SISGAS.

## "A COMMITMENT FROM ALL"

### 3. RISK MANAGEMENT AND RESPONSIBLE FOR COMPLIANCE

At the MEF, we periodically identify and assess the bribery risks to which public servants who carry out activities in the "*Transfer of Resources*" service are exposed, documenting the results in the risk map, establishing control plans for the prioritized risks, with the clear objective of preventing and reducing their probability of occurrence, as well as to establish follow-up and control mechanisms.

As a result of the internal and external mechanisms for evaluating the efficacy of our **SISGAS**, we have established measures and **commit ourselves to continuously improve it**, with the aim of creating a truly dynamic system, capable of adapting to changing circumstances due to external factors, to the improvements, opportunities, and shortcomings detected.

For a maximum guarantee of independence, the role of the **Responsible for the Compliance Function** has been defined, empowered with adequate capacity, independence and authority, so that, under direct dependency of the **Minister of Economy and Finance**, it ensures the correct implementation and improvement of our **SISGAS**.

### 4. CODE OF ETHICS AND NON-COMPLIANCE


At the MEF, we have a current **Code of Ethics** approved by the Minister of Economy and Finance, which is of mandatory application to all public servants and which is brought to the attention of all employees at the time of joining the institution.

Said Code of Ethics applies to **all MEF employees**, notwithstanding the administrative and legal responsibilities by action or omission, in the performance of their duties. In this sense, we have a **disciplinary regime**, established in the **Internal Code** of the institution, of which all servants are informed, to sanction behavior contrary to the provisions of this Anti-bribery Policy and the Code of Ethics; and the non-compliance of the remaining requirements of the **SISGAS**. The application of sanctions will be done in an equitable, proportional manner, without discrimination and respecting due process.

### 5. CLAIMS CHANNEL

Any servant or official of our institution, acting under a state authority in an authorized manner on behalf of the MEF, has the legal obligation to inform and report any action, behavior, information, or evidence that

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is susceptible or suspected of violating this **Anti-bribery Policy** or the requirements of the **SISGAS** of our institution.

At the MEF we have provided the following means for anyone to report a suspicious act or behavior, or to raise any kind of doubt or query about it:

**CLAIMS CHANNEL** accessible on our website (<https://www.finanzas.gob.ec/>); directly accessing the link <https://www.finanzas.gob.ec/denuncia-aqui-la-corrupcion/>; or, through the e-mail address [denuncias@finanzas.gob.ec](mailto:denuncias@finanzas.gob.ec)

At the MEF, we value positively the communication of any indication or suspicion of acts by a public servant or interested parties, that infringe upon this policy or the Code of Ethics and, in general, any action contrary to the current legal framework; so it is important to establish in greater detail the facts reported or communicated. To this end, safe internal mechanisms and processes have been established to guarantee the **confidentiality** of the complaints and communications received.

The Ministry of Economy and Finance commits itself to take all necessary actions, within its scope of competence, to **avoid** any type of administrative reprisals against the complainant or informant.

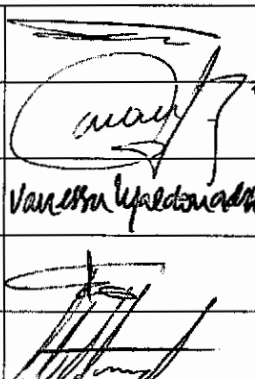
**Approved by:**



Economist Richard Martínez Alvarado



**MINISTER OF ECONOMY AND FINANCE**

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