



Supplier Code of Conduct & Ethics

Contents

Introduction	1
Our approach	1
Scope	2
Purpose	2
Human Right and Labor Practice	3
Diversity, Equity & Inclusion	4
Environmental Sustainability	5
Integrity, Ethics & Anti-Corruption	6
Accuracy and Completeness of Books and Records	7
Gifts and Entertainment	8
Compliance with this Code and Applicable Laws & Regulations	9



Introduction

Areti Bank is an International Financial Entity providing a range of products and services to personal, commercial, corporate, and institutional customers. We are a Puerto Rico bank with our headquarters in San Juan supporting our customers to access international banking systems in LATAM, Europe, Asia and the U.S.

Our Mission is to generate a positive impact to people and the environment through our products and services, providing financial products and services which generate a positive contribution to sustainable development. To drive this, we became signatory of the UN Principles for Responsible Banking (PRM), we operate in accordance with the ten principles of the United Nations Global Compact , and we have aligned our strategy with the 2015 Paris Agreement and the UN Sustainability Development Goals (SDG's) to support these goals.

Our Approach

Areti Bank is committed to aligning our operations with universal principles on human rights, labor, environment and anti-corruption, and to take actions that advance societal goals. As such, Areti Bank expects all companies and individuals which supply goods, materials, or services to Areti Bank (“Suppliers”) to seek to adhere to these same standards and principles or their equivalent.





Scope

This Suppliers Code of Conduct and Ethic (“Code”) has been adopted by the Board of Directors of Areti Bank International Inc. and applies to every all companies and individuals which directly or indirectly supply goods, materials or services to of Areti Bank and its subsidiaries.



Purpose

The Supplier Code of Conduct and Ethic (“Code”) sets forth the minimum principles Areti Bank and its subsidiaries and affiliates (collectively, “Areti”) expect Suppliers to follow when doing business with Areti Bank. As Areti is a multi-national organization, this Code should be read as applying globally although there may be differences in application for specific regions. Local legal requirements, labor law, and specific contractual agreements are the mechanisms by which the Code will be applied and shall supersede this Code if there are any inconsistencies.

The Code of Conduct is based on Areti’s core values which are enterprising, ethical, driven, dedicated, and united. These core values are what helps Areti maintain the highest level of service for its customers and acts as a differentiator in the marketplace. Areti Bank expects its Suppliers to act in accordance with the Code and enforce policies that support these principles as well as its strategic ESG initiatives that are built to address critical, long-term sustainability needs for Areti, its stakeholders, and the world around us. If, in the sole judgment of Areti, a Supplier has violated this Code, Areti shall have the right to terminate the Supplier relationship immediately and without penalty to Areti.



Human Rights and Labor Practices

As defined by the [United Nations](#) human rights are inherent to all human beings and include the right to life, health and well-being, privacy, fair wages, and decent working conditions; freedom from discrimination, slavery and torture; and freedom of association. We expect all our suppliers to maintain processes to identify, manage, and prevent adverse human rights impacts that could arise from their operations and to demonstrate respect for human rights in line with the expectations outlined in the UN Global Compact Ten Principles.

More specifically, Areti Bank expects our Suppliers to:

- Provide a safe and secure workplace for their employees that fully complies with all health and safety laws, regulations, and practices.
- Ensure that all employees are provided with appropriate health and safety training, such as safe work practices and emergency preparedness.
- Fully comply with all applicable laws and regulations when setting employee conditions on working hours, benefits, and wages (such as minimum legal wages).
- Fully comply with all applicable child labor laws and only employ workers who meet the minimum legal age for that jurisdiction. Where local laws are less stringent than the International Labor Organization (“ILO”) minimum age convention, Areti Bank expects suppliers to comply with ILO standards.
- Not to use any involuntary labor, such as slave, forced, bonded, indentured or prison labor and not be involved in any human trafficking or exploitation.
- Manage their employees in a fair and ethical manner and assure that all employees are treated with dignity and respect.
- Areti Bank expects our Suppliers to maintain a workplace that is free from unlawful discrimination and harassment in any form.
- In addition, employees should have the right to collective bargaining and be free to join a labor union, unless restricted under local law, for openly communicating, sharing ideas, concerns, or grievances with management regarding working conditions, wages, or benefits without fear of discrimination, reprisal, intimidation or harassment.

Diversity, Equity & Inclusion

We are committed to **cultivating and advancing diversity in all forms**. We believe that a strong culture – one in which inclusion and belonging are paramount – creates room for all employees to contribute the ideas that will shape Areti Bank's and its suppliers' success over the long term. By fully leveraging our people's diverse experiences, backgrounds and insights, we can inspire innovation, challenge the status quo and create better outcomes for our people and our clients.

At Areti Bank we believe in providing equal opportunity in all aspects of employment and we expect the same from our suppliers. We expect our suppliers to be in accordance with all applicable local ordinances and laws, to afford equal opportunity to all qualified applicants and existing employees without regard to race, religion, color, national origin, sex (including pregnancy and gender identity), sexual orientation, age, ancestry, physical or mental disability, marital status, political affiliation, citizenship status, genetic information, or protected veteran status or any other basis that would be in violation of any such ordinance or law.

We encourage suppliers to have in place programs and initiatives to advance diversity, equity and inclusion within their business and to provide transparency regarding diversity, representation as appropriate to their business and the countries in which they operate. This could include measurement and reporting of diversity representation, setting measurable goals to advance representation and employee engagement, and seeking to provide opportunities for the advancement of underrepresented groups.

We encourage suppliers to have in place programs and initiatives to advance diversity, equity and inclusion within their business and to provide transparency regarding diversity, representation as appropriate to their business and the countries in which they operate. This could include measurement and reporting of diversity representation, setting measurable goals to advance representation and employee engagement, and seeking to provide opportunities for the advancement of underrepresented groups.

Further, Areti Bank is committed to developing and seeking out qualified diverse businesses from historically underrepresented groups including companies owned and operated by minorities, women, military veterans, disabled veterans, people with disabilities and members of the LGBT+ community.



Environmental Sustainability

Building better futures through sound environmental management is important to our employees, clients and other stakeholders, and is key to securing our future. We strive to make a meaningful contribution to the UN Sustainable Development Goals by helping our customers' transition to a low carbon economy. We intend to do what is necessary to achieve alignment with the 2015 Paris Agreement. Areti Bank recognizes the significant societal, ecological and economic threats of climate change. Areti is deepening the integration of climate risks and opportunities into its business. This includes setting internal targets like reducing its own emissions and taking steps to achieve carbon neutral operations, including business travel, and 100% renewable electricity by 2025. Given our own goals and our work to support the innovation economy, Areti expect its Suppliers to manage environmental impacts and to operate in an environmentally friendly manner to the best of their ability. Suppliers shall comply with all applicable environmental laws and regulations.

We are committed to saving, protecting, and restoring our natural environment by better managing our resources in the operations of our business and in the communities in which we operate. Areti Bank expects all suppliers to endeavor to minimize the adverse effects of their own operations and suppliers on the environment and natural resources. This includes, but is not limited to, compliance with all applicable laws and regulations in relation to the protection of the environment and to have strategies in place to reduce their environmental impact.

Integrity, Ethics & Anti-Corruption

VAreti Bank expects our Suppliers to act and conduct themselves in the highest ethical manner in all business dealings and interactions.

Areti Bank expects all suppliers to:

- Suppliers shall disclose all actual or potential conflicts of interest due to either business or personal relationships with customers, business associates, competitors, or with Areti employees. Should Suppliers discover a potential conflict of interest, contact an Areti relationship manager.
- Refrain from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations, or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence business decisions. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety;
- Comply with anti-competition and antitrust laws and are prohibited from fixing prices, colluding or rigging bids with competitors, allocating customers or markets with competitors, or exchanging any pricing information with our competitors;
- Areti Bank requires its Suppliers to conduct themselves in a fair, reasonable and honest manner. Supplier shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Supplier shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anticorruption conventions.
- Exercise risk-based due diligence and monitoring to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of third parties.

Accuracy and Completeness of Books and Records

For Suppliers (“Company”) involved in providing accounting or financial statement services, you must adhere to the following guidelines:

Areti Bank expects all suppliers to:

- Do not make false, intentionally improper, or misleading entries in the books and records of the Company.
- Provide complete and accurate information in response to inquiries from Areti’s regulators and auditors, both internal and external.
- Do not establish or maintain undisclosed or unrecorded funds or assets of the Company for any purpose except when obsolete or surplus.
- All payments made by, or on behalf of the Company, for any purpose will be fully defined and are to be made only for the purpose described in the documents and records of the Company supporting the payment.
- Submit all documents reflecting a binding element of a contract with a customer that is not reflected in the final transaction documents (such as “side letters” including those made by email) to the Finance department.
- If you participate in the development or the review of Areti’s financial reports, you must provide full, fair, accurate, timely and understandable disclosure in reports and documents that Areti Bank files with, or submits to, the Office of the Commissioner for Financial Institutions and in other public communications made by Areti.



Gifts and Entertainment

Suppliers shall not give or offer anything to Areti employees or its representatives in an effort to influence actions or gain an advantage with Areti. Areti Bank does not tolerate acts that are or would be perceived to be bribery or corruption in any form. Areti expects its Suppliers to comply with all federal, state, provincial and municipal laws including all antitrust and fair-trade policies.

Compliance with this Code and Applicable Laws & Regulations

Suppliers shall not give or offer anything to Areti employees or its representatives in an effort to influence actions or gain an advantage with Areti. Areti Bank does not tolerate acts that are or would be perceived to be bribery or corruption in any form. Areti expects its Suppliers to comply with all federal, state, provincial and municipal laws including all antitrust and fair-trade policies.

Complying with the Code is a condition of service to Areti. We ask that Suppliers read this document carefully, considering the spirit as well as the letter of the policies detailed here. Failure to comply with this Code of Conduct may result in corrective action up to and including termination of contract.

Areti Bank requires all our suppliers (and their subcontractors) to fully comply with all laws and regulatory requirements applicable to such supplier's business activities. Understanding that the standards set forth in this Code may differ from local laws, regulations and customs, this Code should still be read as applying globally. If the Code conflicts with local laws or ordinances, Areti Bank expects our suppliers to notify us of any such conflict in a timely manner and communicate how the supplier is planning to adhere to the general principles articulated in the code and operate in an ethical and responsible manner.

Suppliers are responsible for adhering to the Code. Suppliers are expected to notify Areti Bank of any material deviation from the expectations described in this Code and the corrective actions that are being taken to address such deviations. We define a material deviation as conduct that deviates from this Code, which could be reasonably expected to affect the ability of the supplier to provide the agreed products or services to Areti Bank, lead to regulatory fines, penalties or sanctions for the supplier or Areti Bank, or negatively affect the supplier's or Areti Bank's reputation.

If Areti Bank is not notified or if the corrective action plan is deemed insufficient, Areti Bank reserves the right to take action up to, but not limited to, terminating its relationship with any Supplier who fails to adhere to this Code.

Relevant notifications should be immediately provided to the primary Areti Bank's contact or relationship manager and/or writing to info@aretibank.com.

The image features a large, dark blue leaf-like shape on a medium blue background. The word "Aretí" is written in a white, italicized sans-serif font, with a small, colorful, multi-segmented circular icon above the letter 'i'. To the right of "Aretí" is the word "Bank" in a smaller, white, italicized sans-serif font, followed by a trademark symbol (TM).

Aretí  *Bank*TM