



Employee Handbook

Owner: Human Capital

Policy Number: HC0001

Latest Annual Revision Date: January 2024

This policy must be read and followed in conjunction with all other applicable policies, standards, training and guidelines as may be in effect at Banesco USA

Banesco USA has policies in place to ensure compliance with changes in external regulations. In addition to compliance, documented policies should be in place to ensure best practices throughout the Bank.

Table of Contents

General Employment Information	5
Nature of Employment	5
Employment Diversity	5
Equal Employment Opportunity	5
Americans with Disabilities Act	6
Employment Conditions	6
Immigration Law Compliance	6
Employment Applications	7
Credit, Criminal and Motor Vehicle Background Checks	7
Substance Testing of Applicants	7
Employment Categories	7
Key Employment Policies	9
Introductory Period	9
Promotions and Transfers	9
Performance Evaluations	10
Progressive Counseling	10
Outside Employment	11
Nepotism, Employment of Relatives and Personal Relationships	11
Employment Records	12
Separation of Employment	12
Rehire	14
Employment References	14
Compensation	14
Exempt Employees	14
Non-Exempt Employees	15
Internship Program	16
Meal Periods	17
Timekeeping	17
Pay Policy	18
Pay Methods	18
Overtime	18

Pay Deductions	19
Administrative Pay Corrections.....	19
Emergency Closings	20
Employee Travel and Reimbursement.....	20
Bonus Programs	21
Leave of Absence	22
Holidays.....	22
Paid Time-Off (PTO) Days.....	23
Vacation Days.....	25
Personal Days.....	27
Sick Days.....	27
Leave Your Mark Days.....	28
Jury Duty	28
Witness Leave	29
Voting Leave.....	29
Bereavement Leave	29
Personal Leave of Absence	29
Lactation Breaks.....	30
Parental Leave.....	31
Military Leave of Absence.....	32
Family and Medical Leave.....	34
Benefits	40
Group Insurance.....	40
Benefits Continuation (COBRA)	40
Workers’ Compensation	41
Retirement Plan	41
Bank Discounts.....	42
Employee Referrals	42
Training and Development	43
Work Conditions	44
Code of Ethics and Conduct	44

Standards of Conduct.....	44
Attendance and Punctuality.....	44
Dress Code & Personal Appearance	45
Solicitation	46
Open Communication	46
Safety & Security.....	47
Workplace Violence	47
Prohibited Conduct	48
Procedures for Reporting Workplace Violence.....	48
Harassment	48
Non-Harassment	48
Sexual Harassment and Other Forms of Harassment.....	49
Complaint Procedures.....	49
Workplace Bullying	50
Productive Work Environment	50
Drug and Alcohol-Free Workplace.....	50
Smoking.....	52
Travel Policy	52
Visitors in the Workplace.....	53
Clean Desk.....	53
Publicity Statements	53
Operation of Vehicle for Business.....	54
Telecommuting and Remote Work Program.....	54
Workplace Monitoring.....	59
Corporate Social Responsibility Program.....	59
Volunteering	60
Employee Handbook Acknowledgement and Receipt.....	61
Acknowledgement of Anti-Harassment and Non-Discrimination Policies	62

Welcome Statement

Welcome to Banesco USA (“Banesco USA” or the “Bank”)!

As a Banesco employee, this employee handbook will acquaint and guide you with information in regard to key policies, employee benefits and employment practices. It describes many of your responsibilities as an employee and outlines our robust benefit programs available. One of our objectives is to provide a healthy work environment that is conducive to both personal and professional growth.

At Banesco USA, we live by our values, RESPONSIBILITY, RELIABILITY, QUALITY and INNOVATION. Being a Banesco employee involves carrying out each task with great enthusiasm, dedication and commitment. We know that success lies in working inspired by the values that have always distinguished us and have helped us to be a leading company, recognized for the strength and charisma of our HUMAN CAPITAL.

THE EMPLOYEE HANDBOOK IS NOT A CONTRACT. NEITHER THE HANDBOOK NOR ANY OF ITS POLICIES SHOULD BE CONSTRUED AS THE BANK’S GUARANTEE OR PROMISE OF EMPLOYMENT OR A GUARANTEE OR PROMISE TO PROVIDE A BENEFIT OF EMPLOYMENT. The Bank is an at-will* employer and reserves the right to terminate an employee at any time for any reason, with or without cause or notice. The employee possesses the same right to terminate his or her employment with the Bank.

No employee handbook can anticipate every circumstance or question about a policy. Changed circumstances sometimes may cause the Bank to amend the employee handbook. The Bank reserves the right to revise, supplement, or rescind any or all of the policies in the employee handbook as it deems appropriate, in its sole and absolute discretion, and without prior notice. The only exception is our employment-at-will* policy permitting you or the Bank to end our relationship for any reason at any time. Employees will, of course, be notified of changes to the employee handbook as these occur.

None of the policies in the employee handbook can be orally modified by any staff member, supervisor, or director of the Bank. Only a written statement from the Bank by an authorized Bank representative will serve as an official change of the policies set forth in the employee handbook.

The policies in this employee handbook are intended to make working together more effective and meaningful. To ensure full understanding, make sure you read the policies and discuss any doubts with the Human Capital Department. Our greatest assets are our employees. You help us thrive as a successful financial institution.

Sincerely,

Executive Management

*Excludes Puerto Rico Employees

General Employment Information

Nature of Employment

Florida Employees

Your employment relationship with Banesco USA is an employment at-will. Your job status does not guarantee employment for a specific length of time. Your employment with Banesco USA is entered into voluntarily and you and Banesco USA are free to end the employment relationship at any time, for any reason, with or without cause or advance notice.

Although other terms and conditions of employment may change, this at-will employment relationship will remain in effect throughout your employment with the bank, unless it is specifically modified by an express written employment agreement executed by an authorized agent of the bank and you, and which expressly states that the agreement is modifying the at-will relationship. The at-will employment relationship may not be modified by any oral or implied agreement or by any person, statement, act, series of events, or pattern of conduct.

Puerto Rico Employees

Your employment relationship with Banesco USA is not an employment at-will. In Puerto Rico, (Act No. 80) requires employers to have just cause for employment termination. New employees who are terminated during the established initial 90-day employment introductory period are not subject to the “just cause” requirement of Act No. 80, provided that the requirements of a successful completion of the introductory period have been met.

Employment Diversity

Equal Employment Opportunity

Banesco USA provides equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran, or any other grounds in accordance with applicable federal, state, and local laws. For Puerto Rico, additional protected categories include social origin, social condition, political or religious ideology/affiliation and being a victim or being perceived as a victim of domestic violence, sexual aggression or stalking.

Banesco USA complies with applicable state and local laws governing nondiscrimination in employment in every location where the Bank has facilities. The Bank is an equal opportunity employer. This policy applies to all terms and conditions of employment, including recruitment, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Any employee with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of the Human Capital Department. Employees can raise concerns

and make reports without fear of reprisal. Anyone found to be engaging in any conduct in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

Americans with Disabilities Act

The Bank is committed to fully complying with the Americans with Disabilities Act (“ADAAA”) and ensuring equal opportunity in employment for qualified persons with disabilities.

Hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities. Upon request, job applications are available in alternative, accessible formats, as is assistance in completing the application. Reasonable accommodations are available to all qualified disabled employees. Requests for such reasonable accommodation should be made to your supervisor and to the Human Capital Department.

This policy is neither exhaustive nor exclusive. The Bank is committed to taking all other actions necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADAAA and all other applicable federal, state, and local laws. This policy applies to all areas of employment and includes the provision that no employee shall harass any other employee on any of the basis listed above.

It is the policy of the Bank to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

The Bank will make reasonable accommodations for qualified individuals with disabilities so that they can perform the essential functions of the job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation. Please, contact the Human Capital Department with any questions or requests for accommodation.

Employment Conditions

Immigration Law Compliance

The Bank is committed to employing people who are authorized to work in the United States and does not discriminate on the basis of citizenship or national origin. In compliance with the Immigration Reform and Control Act of 1986, all employees, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must complete a new form upon rehire.

In alignment with our commitment to maintaining a legal and authorized workforce, we have implemented the use of E-Verify as an additional step in our hiring and onboarding process. E-Verify is an electronic employment verification system that allows us to further validate the employment eligibility of our prospective employees.

Employment Applications

The Bank relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in the Bank's exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

Employment with the Bank is offered contingent upon receipt of satisfactory background information on the subject's employment history, education, credit records (whenever deemed necessary) and criminal records and substance testing.

Credit, Criminal and Motor Vehicle Background Checks

Credit and criminal background checks will be conducted by the Human Capital Department on all applicants for permanent or temporary positions who will be offered employment with the Bank. The credit and criminal background comply with the FCRA requirements and provides "A Summary of Your Rights Under the Fair Credit Reporting Act" disclosure with the employment offer.

Motor Vehicle Records will be conducted to those employees whose job requires use of a vehicle for business purpose upon offering employment and on an annual basis. Additional, background screening for MLO's will be conducted throughout the period of employment in manner determined by Executive Management and/or the Human Capital department and pursuant to applicable laws and proper authorization.

All offers of employment are contingent upon satisfactory completion of reference and background checks. Any employee who has omitted or misstated material facts on their employment application or other pre-employment or employment documents will be subject to termination of employment.

Credit, substance, criminal and motor vehicle background checks can be conducted throughout the period of employment in manner determined by Executive Management and/or the Human Capital Department and pursuant to applicable laws and proper authorization.

Substance Testing of Applicants

All applicants considered final candidates for a position will be tested for the presence of drug and/or alcohol as a part of the application process as permitted by law. Consistent with legal requirements, the Bank reserves the right to exclude any applicant from consideration for employment, where the applicant refuses to sign these forms as requested.

Employment Categories

It is the intent of Banesco USA to clarify the definition of employment categories, so employees understand their employment status and benefit eligibility. Each employee is designated as either "non-exempt" or "exempt" from federal and state wage and hour laws.

Exempt employees are generally salaried management personnel. Exempt employees are paid on a salary basis. Exempt employees are not eligible for overtime pay and may be required to work more than 40 hours per workweek without additional compensation.

Non-exempt employees are generally paid on an hourly basis and are eligible for overtime pay paid at a rate of 1.5 times the employee's regular hourly rate after working 40 hours in a workweek. Non-exempt employees must properly record actual hours worked, including overtime hours, each day utilizing the Bank's time system. Actual hours worked refer to the starting time in the morning, going and returning from lunch, going and returning from a personal appointment (e.g., doctor's visit), and the time of departure. Overtime must be approved by your immediate supervisor and/or manager. Failure to properly utilize the time system or performing unauthorized overtime work may result in discipline, up to and including termination.

In addition to the above classification, each employee will belong to one of the categories below:

Full-Time Employees

Full-time employees are those who are not in a part-time, temporary or contract status and who are regularly scheduled to work a full-time schedule of at least 40.00 hours per week. Generally, these employees are eligible for the full benefits package, subject to the terms, conditions and limitations of each benefit program.

Part-Time Employees

Part-Time employees are those who are regularly scheduled to work less than 25.00 hour per week. While part-time employees receive all legally mandated benefits, they are ineligible for some of the Bank's benefit programs.

Temporary Employees or Internships

Temporary employees are those who are hired as interim replacements to temporarily supplement the work force, or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status unless and until notified of a change. While temporary employees receive all legally mandated benefits, they are ineligible for some of the Bank's benefit programs.

Internship can be paid or unpaid educational or training programs designed to provide students with professional experience. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Interns retain that status unless and until notified of a change. While temporary employees receive all legally mandated benefits, they are ineligible for some of the Bank's benefit programs.

Key Employment Policies

Introductory Period

The introductory period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets their expectations. The Bank uses this period to evaluate, among others, employee capabilities, work habits, and overall performance. All new and rehired employees work on an introductory basis for the first 90 calendar days after their date of hire or date of rehire. The Bank will conduct a formal introductory period evaluation for new hire employees, completed by either the immediate supervisor or a manager designated by the Bank, before the end of the ninety (90) days.

Florida Employees

The completion of the introductory period does not alter the employment at-will status. Either the employee or the Bank may end the employment relationship at any time during or after the introductory period, with or without cause or advance notice. If the Bank determines that the designated introductory period does not allow sufficient time to thoroughly evaluate the employee's performance, the introductory period may be extended for a specific period.

Puerto Rico Employees

The Bank may extend the introductory period if it desires up to a maximum of six (6) months, for which an approval from the Secretary of Labor of Puerto Rico will be obtained.

Promotions and Transfers

Employees may apply for transfers to other jobs as vacancies become available and will be considered along with other applicants. Internal applicants must discuss the transfers and vacancies with their immediate supervisor and complete the online internal application for consideration. However, the Bank reserves the right to recruit outside candidates to ensure that the best qualified individuals are selected for the job vacancies.

Banesco USA offers employees promotions to higher-level positions when appropriate. Executive Management prefers to promote from within and may first consider current employees with the necessary qualifications and skills to fill vacancies above the entry level, unless outside recruitment is considered to be in the Bank's best interest.

To be considered for promotions and/or transfer, employees must have held their current position for at least 12 months, have a satisfactory performance record and have no disciplinary actions during the prior 12 months. Management retains the discretion to make exceptions to this policy.

The Bank reserves the right, at all times, to transfer employees to different positions when deemed necessary to maintain efficient operations and fill critical job needs.

Performance Evaluations

Banesco USA conducts formal performance evaluations for employees on an annual basis. The annual performance evaluation will recognize employee's achievements and indicate areas of improvement. The annual performance evaluation will be considered in determining suitability for transfers, promotions, or retention in employment and it will become a permanent part of the personnel file. Merit increases and bonuses, if applicable, will be based upon performance and at the discretion of Executive Management.

Progressive Counseling

Every employee has the duty and responsibility to be aware of and abide by existing rules and policies. Employees also have the responsibility to perform his/her duties to the best of his/her abilities and to the standards as set forth in his/her job description or as otherwise established.

Banesco USA supports the use of employee counseling to address issues such as poor work performance or misconduct. Our employee counseling policy is designed to provide a corrective action process to improve and prevent a recurrence of undesirable behavior and/or performance issues. Our employee counseling policy has been designed consistent with our organizational values, HR best practices and employment laws.

Outlined below are the general steps of our employee counseling policy and procedures. Banesco USA reserves the right to combine or skip steps in this process depending on the facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling and/or training; the employee's work record; and the impact that the conduct and performance issues have on the Bank.

The following outlines the Bank's employee counseling process (which may be modified, at the Bank's sole discretion, based on the violation, severity of the conduct, and/or performance issues):

Verbal Warning

A supervisor verbally counsels an employee about an issue of concern, and a written counseling record of the discussion may be placed in the employee's file for future reference.

Written Warning

Written warnings are used for behavior or violations that a supervisor considers serious or in situations where a verbal warning has not changed unacceptable behavior. Written counseling records are placed in an employee's personnel file. Employees should recognize the grave nature of the written warning.

Performance Improvement Plan or Final Warning

Whenever an employee has been involved in a counseling situation that has not been readily resolved or when he/she has demonstrated an inability to perform assigned work responsibilities

efficiently, the employee may be given a final warning or placed on a performance improvement plan. Within this time period, the employee must demonstrate a willingness and ability to meet and maintain the conduct and/or work requirements as specified by the supervisor and the organization. At the end of the performance improvement period, the performance improvement plan may be closed or, if established goals are not met, dismissal may occur.

These disciplinary action steps are not intended to create or imply a guarantee in the action taken by the Bank in case of any infraction; the Bank reserves the right to apply immediate discipline action and to terminate employment at any time for any reason.

Banesco USA reserves the right to determine the appropriate level of counseling for any inappropriate conduct, including verbal and written warnings, suspension with or without pay, demotion and discharge.

Outside Employment

As a Bank employee, you are expected to devote your full time and attention to your duties and our business during the workday. While employment outside of the Bank is not necessarily prohibited, care must be taken to ensure that all outside employment does not interfere with your obligations to the Bank. In order to accomplish this goal, the following guidelines must be followed:

- You must inform the Human Capital Department if you have or are considering an outside employment.
- The outside employment cannot involve an actual or appearance of conflict of interest or other impropriety as determined in the sole discretion of the Bank.
- The outside employment must not reflect negatively in any manner on you or the Bank.
- You may not engage in outside employment with any competitor or potential competitor of the Bank.

Employees must obtain written permission from Human Capital prior to accepting outside employment and continue to meet the performance standards of their job with the Bank. All employees will be judged by the same performance standards and will be subject to the Bank's scheduling demands, regardless of any existing outside work requirements.

For additional information, please refer to the Banesco Code of Ethics and Conduct.

Nepotism, Employment of Relatives and Personal Relationships

The employment of relatives or individuals involved in a dating relationship in the same area of the Bank may cause a real or perceived conflict of interest, problems with favoritism, and employee morale. In addition, personal conflicts from outside the work environment can be carried over into day-to-day working relationships. To avoid these problems, Banesco USA may refuse to hire or place a relative in a position where the potential for favoritism, conflict, or appearance of impropriety exists. All employment of relatives needs to be presented in writing to the Human Capital Department for approval.

For purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage. A dating

relationship is defined as a relationship that may be reasonably expected to lead to the formation of a consensual “romantic” or sexual relationship.

Relatives of current employees may not work in the same division or directly work for or supervise a relative. Individuals involved in a dating relationship with an employee may also not work in the same division or directly work for or supervise the employee with whom they are involved in a dating relationship. The Bank also reserves the right to take prompt action if an actual or potential conflict of interest arises involving relatives or individuals involved in a dating relationship who occupy positions at any level (higher or lower) in the same line of authority that may affect the review of employment decisions.

If a relative or dating relationship is established after employment between employees who are in a reporting situation described above, it is the responsibility and obligation of the employees involved in the relationship to disclose the existence of the relationship to the Human Capital Department. Upon receipt of this information, the Human Capital Department will work with the affected employees to identify a solution acceptable to all concerned. However, the Bank retains the right to maintain an environment free of actual or perceived conflicts of interest.

In other cases where a conflict or the potential for conflict arises because of the relationship between employees, even if there is no line of authority or reporting involved, the employees may be separated by reassignment or other action deemed to be required by the Bank up to and including termination. Employees in a close personal relationship should refrain from public workplace displays of affection or excessive personal conversation.

For additional information, please refer to the Banesco Code of Ethics and Conduct.

Employment Records

Banesco USA maintains a personnel file on each employee. Personnel files are the property of the Bank, and access to the information they contain is restricted. Generally, only supervisors and officers of the Bank who have legitimate reason to review information in a file will be allowed to do so.

Current employees who wish to review their own file should contact the Human Capital Department. With reasonable advance notice, current employees may review their own personnel files in the presence of the individual appointed to maintain the files.

It is the responsibility of the employee to promptly notify the Human Capital Department of any changes in personnel data. Personnel data includes personal mailing addresses, telephone numbers, and name of dependents, emergency contact, educational accomplishments and beneficiary designations as needed for benefit programs. This information must always be accurate and current.

Separation of Employment

Termination of employment is an inevitable part of personnel activity within any organization. Below are examples of the most common circumstances under which employment is terminated:

Resignation

Although we hope your employment with us will be a mutually rewarding experience, we understand that varying circumstances causes employees to voluntarily resign employment. Resigning employees must submit a written notice of resignation to the respective supervisor and the Human Capital Department at least two (2) weeks prior to the last day of employment.

The Bank has the right to cancel any scheduled or unscheduled PTO days during the resignation notice period.

Retirement

Employees who wish to retire should notify their respective supervisor and the Human Capital Department in writing at least one (1) month before the planned retirement date.

Job Abandonment

Employees who fail to report to work or contact their supervisor for three (3) consecutive workdays shall be considered to have abandoned their job without notice, effective at the end of their normal shift on the third day. The supervisor shall notify the Human Capital Department immediately.

Termination

The Bank retains the right to terminate an employee at any time.

The separating employee must return all company property at the time of separation, including, cellular phones, keys, PCs, ID cards, laptop, etc. Failure to return some items may result in deductions from the final paycheck consistent with the Telecommuting and Remote Work Program guidelines specified herein.

Employees will receive their final pay in accordance with applicable state law. In separation of employment, accrued unused paid time-off or vacation time will be paid in the last paycheck. Paid time-off, vacation, sick and personal time not accrued will be deducted in the last paycheck.

Most insurance benefits terminate the last day of the month of employment. Information for COBRA continuation coverage benefits will be provided in writing pursuant to applicable law.

The Human Capital Department must be present during involuntary separation of employment. During a voluntary separation, the employee shall contact the Human Capital Department as soon as notice is given to schedule an exit interview. The interview will take place on the employee's last day of work or another day, as mutually agreed.

Rehire

Former employees who left Banesco USA in good standing and were classified as eligible for rehire may be considered for reemployment. The former employee must conduct the recruitment process and submit their application to the Human Capital Department, and the applicant must meet the minimum qualifications and requirements of the position to proceed in the recruitment process.

Rehired employees whose last day of service was over one (1) year will begin benefits just as any other new employee. Previous tenure will not be considered in calculating longevity, leave accruals or any other benefits.

An applicant or employee who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation will be ineligible for rehire.

Employment References

The Bank does not provide letters of recommendation to employees. However, the Bank will provide general information in writing concerning the employee's dates of employment and job title. Requests must be submitted in writing to the Human Capital Department.

Compensation**Exempt Employees****Florida Employees**

Banesco USA usual hours of operations are Monday through Friday from 8:30 a.m. to 5:00 p.m. It is our policy to accurately compensate employees in compliance with all applicable State and Federal laws. To ensure that you are paid properly, you must review your pay stubs promptly to identify and report all errors.

Classified exempt employees received a salary which is intended to compensate for all hours worked for the Bank. This salary is established at the time of hire and/or when you become an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject for variations in the quantity or quality of work.

The following are reasons for salary reduction:

- Full day disciplinary suspension for infractions of written policy and procedure
- Family and Medical Leave absences
- The first or last week of employment in the event you work less than a full week

The following are reasons for your salary to not be reduced, in any work week in which you performed any work:

- Partial day absences for sickness or disability
- Your absences on a day because your employer closes a facility on a schedule workday

Your salary may also be reduced for certain types of deductions such as your portion of health, dental, vision or life insurance premiums; state, federal or local taxes; social security; or voluntary contributions to a 401K plan. However, unless State law provides otherwise, deductions may be made to your accrued leave for full or partial day absences for sickness, vacation or disability.

Puerto Rico Employees

Banesco USA usual hours of operations are Monday through Friday from 8:30 a.m. to 5:00 p.m. It is our policy to accurately compensate employees in compliance with all applicable State and Federal laws. To ensure that you are paid properly, you must review your pay stubs promptly to identify and report all errors.

Classified exempt employees received a salary which is intended to compensate for all hours worked for the Bank. This salary is established at the time of hire and/or when you become an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject for variations in the quantity or quality of work.

The following are reasons for salary reduction:

- Full day disciplinary suspension for infractions of written policy and procedure
- Family and Medical Leave absences
- The first or last week of employment in the event you work less than a full week

The following are reasons for your salary to not be reduced, in any work week in which you performed any work:

- Partial day absences for sickness or disability
- Your absences on a day because your employer closes a facility on a schedule workday

Your salary may also be reduced for certain types of deductions such as your portion of health, dental, vision or life insurance premiums; state, federal or local taxes; social security; or voluntary contributions to a Retirement Plan. However, unless State law provides otherwise, deductions may be made to your accrued leave for full or partial day absences for sickness, vacation or disability.

Non-Exempt Employees

Florida Employees

Banesco USA usual hours of operations are Monday through Friday from 8:30 a.m. to 5:00 p.m. Full-time non-exempt employees are schedule to work 40.00 hours per week and will be compensated according to the hours worked.

Starting time and lunch schedules are established to provide maximum service to our customers and efficient operation of the Bank. Your immediate supervisor will explain your working schedule and lunch schedule. The Bank reserves the right to change any employee's work schedule, shift or days off to meet its needs.

Puerto Rico Employees

Banesco USA normal hours of operations are Monday through Friday from 8:30 a.m. to 5:00 p.m. Full-time non-exempt employees are schedule to work 40.00 hours per week and will be compensated according to the hours worked. Starting time and lunch schedules are established to provide maximum service to our customers and efficient operation of the Bank. Your immediate supervisor will explain your working schedule and lunch schedule. The Bank reserves the right to change any employee's work schedule, shift or days off to meet its needs.

It is the policy of the Bank to provide lunch breaks during the course of each workday. Non-exempt employees must take a lunch break commencing not before the end of the third (3rd) hour of work and not later than at the beginning of the sixth (6th) hour of work. An employee should never be required to work more than five (5) consecutive hours without pausing for a lunch break. Lunch breaks are set by your immediate supervisor with the goal of providing the least possible disruption to the Bank's operations. A lunch break must not exceed one (1) hour in length. Employees will be relieved of all active job duties while on lunch break.

Non-exempt employees are also entitled to a second meal period after five (5) consecutive hours of work after the previous meal period. This second meal period may also be reduced. Furthermore, if the employee only works two (2) hours or less of daily overtime, the second meal period may be waived by the employee if it is for his/her mutual benefit and that of the employer and it is so stipulated in writing.

Internship Program

Internships are those who are employed for a limited period. This position can be a paid or an unpaid position. This position can be beneficial for educational, or training programs designed to provide students with professional experience.

Paid and unpaid internships are involved in education or training programs designed to provide students with professional experience in the furtherance of their education and training and are academically oriented for their benefit.

Banesco USA may employ interns to perform work which will not:

1. Result in the displacement of regular employees or impair existing contracts for service;

2. Fill a vacant position;
3. Be used as a supplemental workforce to enhance or expand the delivery of service; or
4. Be primarily clerical in nature.

Work performed by an intern bears a relationship to his or her formal academic program or career interest. The Human Capital department may regularly review the duties performed by student interns to ensure that they are engaged in meeting their learning objectives. It is recommended that the student intern provide a presentation at the end of the internship or at appropriate intervals to demonstrate how the learning objectives were met.

Paid internship are hourly employees under the Fair Labor Standards Act (FLSA) and are, therefore, overtime eligible. Foreign nationals must have the appropriate visa and authorization to engage in internship.

Paid and unpaid interns must satisfactorily complete all applicable training and orientation appropriate to the role prior to commencing activities. Depending on the nature of the service and length of assignment, training may include Onboarding, GLBA, BSA, Risk, Compliance or customer service requirements. Paid and unpaid interns are subject to and must abide by all applicable laws, policies and procedures, including but not limited to those relating to security, confidentiality, intellectual property, computer use, ethics, conflict of interest, criminal background check, drug use, anti-harassment and anti-violence.

Meal Periods

In order to have a productive work environment the Bank provides lunch breaks during the course of each workday. Full-time and part-time employees scheduled to work more than five (5) hours during any workday are allowed an unpaid lunch break near the middle of their workday.

Employees have a meal period of a minimum of thirty (30) minutes scheduled by their immediate supervisor. Employees will be relieved of all active responsibilities during the meal period. In accordance with the federal Fair Labor Standards Act, non-exempt employees will not be compensated for the meal period.

Department supervisors are responsible for scheduling lunch breaks and to ensure that the department is adequately staffed at all times. Bank customers must receive proper and prompt service at all times. The duration and time of lunch breaks may be changed at the discretion of the department supervisor and/or Bank.

Timekeeping

Federal regulations require all non-exempt employees to maintain an accurate record of hours worked in each workday.

It is the responsibility of all non-exempt employees to sign in daily and report their actual time worked online via the timekeeping system. Actual time worked refers to the recording of starting time in the morning, going to and returning from lunch break, and the time of departure at the end of the day, in

addition any departure from work for any non-work-related reason. Immediate supervisors will review, edit and approve the timesheets electronically before payroll cycle.

Altering, falsifying or tampering with time records is prohibited and subjects the employee and/or supervisor to discipline, up to and including termination of employment.

Pay Policy

Florida Employees

All employees are paid semi-monthly on the 15th and last day of the month. In the event that a regularly scheduled payday falls on a day off such as a weekend or holiday, employees will receive pay on the last day of work before the regularly scheduled payday. Banesco USA does not provide pay advances on unearned wages.

Puerto Rico Employees

All employees are paid semi-monthly on the 10th and 25th day of the month. In the event that a regularly scheduled payday falls on a day off such as a weekend or holiday, employees may receive pay on the last day of work before the regularly scheduled payday. Banesco USA does not provide pay advances on unearned wages.

Pay Methods

Banesco USA pays employees via direct deposit. The pay statements are available online through our HRIS system.

Overtime

Florida Employees

The Bank experiences periods of extremely high workload. When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime hours. Your immediate supervisor is responsible for monitoring business activity and requesting overtime work if it is necessary. Efforts will be made to provide you with adequate advance notice in such situations. Overtime assignments will be distributed as equitably as possible to all employees qualified to perform the required work.

Overtime compensation is paid to all non-exempt employees in accordance with Federal Fair Labor Standards Act at the rate of one and one-half (1 ½) times the base hourly rate for the hours worked in excess of forty (40) hours per week. The workweek begins on Sunday and ends on Saturday. Paid leave, such as holiday, vacation, sick, etc. does not apply toward hours worked.

Overtime must be approved by your immediate supervisor. Failure to properly utilize the time system or performing unauthorized overtime work may result in discipline, up to and including termination.

Puerto Rico Employees

The Bank experiences periods of extremely high workload. When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime hours. Your immediate supervisor is responsible for monitoring business activity and requesting overtime work if it is necessary. Efforts will be made to provide you with adequate advance notice in such situations. Overtime assignments will be distributed as equitably as possible to all employees qualified to perform the required work. Non-exempt employees shall not work overtime without pay.

Overtime compensation is paid to all non-exempt employees in accordance with Federal Fair Labor Standards Act at the rate of one and one-half (1 ½) times the base hourly rate for all hours worked in excess of eight (8) hours in any given period of twenty-four (24) consecutive hours. In addition, all non-exempt employees are paid at the rate of one and one-half (1 ½) times the base hourly rate for the hours worked in excess of forty (40) hours per week. The workweek begins on Sunday and ends on Saturday.

Pay Deductions

The law requires that the Bank make certain deductions or withholding from every employee's compensation. The Bank must withhold federal income taxes, social security taxes and any other appropriate taxes unless exempted. The Bank may offer programs and benefits beyond those required by law. Employees who participate in such benefits authorize deductions from their paychecks to cover the cost of these programs.

In addition, if a wage assignment or garnishment is received, the employee will be notified. If necessary, the Bank will, according to state law, accept court order wage assignments or garnishments and process them in the legally prescribed manner which involve, withholding the required amount from each paycheck until the stated date or the debt is paid.

Administrative Pay Corrections

The Bank takes all reasonable steps to ensure that employees received the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday.

In the event that there is an error in the amount paid, the employee must report the discrepancy within ninety (90) days of the occurrence to the Human Capital Department so that corrections can be made as quickly as possible. If an employee does not advise the Human Capital Department of a pay error within this time, then the employee will be deemed to have reviewed and accepted the hours worked set forth on the paycheck.

Emergency Closings

At times, emergencies, such as fires, power failures or hurricanes, can disrupt Bank operations. In extreme cases, these circumstances may require the closing of a work facility. In the event that such an emergency occurs during nonworking hours, management will attempt to contact the employees as soon as possible and will advise employees of future contact procedures.

For non-exempt employees, when the decision to close is made AFTER the workday has begun, employees will receive official notification from their supervisor. In these situations, time off from scheduled work will be paid. When the decision to close is made BEFORE the workday has begun, time off from scheduled work will be unpaid. However, with their supervisor's approval, employees may use available paid leave time, such as unused vacation benefits.

The Bank reserves the right to pay employees during emergency closing at their discretion. Employees in essential operations may be asked to work on a day when operations are officially closed. In these circumstances, employees who work will receive regular pay.

Employee Travel and Reimbursement

Banesco USA will directly reimburse employees for reasonable business travel expenses incurred while on assignment away from the normal work location.

All business travel must be approved prior to travel by the immediate supervisor and/or head of the department. When the travel plans have been approved, all travel arrangements should be done through their immediate supervisor. Employees are expected to limit expenses to reasonable amounts. Employees are required to submit properly approved expense reports on a timely basis. Based on the Accounting Policy. For additional information, please refer to the Accounting Policy.

With prior approval, a family member or friend may accompany employees on business travel, when the presence of a companion will not interfere with successful completion of business objectives. Generally, employees are also permitted to combine personal travel with business travel, as long as time away from work is approved. Additional expenses arising from such non-business travel is the responsibility of the employee.

Abuse or falsifications of this business travel expense policy, including falsifying expense reports to reflect costs not incurred by the employee, can be grounds of disciplinary action, up to and including termination of employment.

Employees who are involved in an accident while traveling on business must promptly report the incident to their immediate supervisor and the Human Capital department.

Travel for Non-Exempt Employees

For non-exempt employees below are the general guidelines of compensable time. For overnight or out-of-town trips, time spent traveling is compensable except for meal periods and any time spent traveling between home and the local bus or plane terminal.

Auto Allowance & Mileage Reimbursement

Auto allowance for Executive Management with production and non-production responsibilities will be paid monthly through payroll.

Mileage reimbursement for all other employees must be submitted to the Accounting Department on the mileage reimbursement expense report along with a map indicating the mileage traveled. Mileage will be reimbursed at the current IRS standard mileage reimbursement rate. For additional information, please refer to the Accounting Policy.

Bonus Programs

Florida Employees

Annually, a discretionary bonus plan may be recommended to some employees depending on the employee's position and eligibility. Discretionary bonus plans are granted and maintained at the sole and exclusive discretion of the Board of Directors and Executive Management. In order to be eligible, employees must have completed, at least, six (6) months of employment and be employed at the time of distribution.

Banesco USA reserves the right to interpret, apply, alter, withdraw, and modify all or some of the terms of the discretionary bonus plan, in whole or in part, at any time with or without advance notice. Bonuses are considered additional compensation to employees and are subject to applicable withholdings.

Puerto Rico Employees

The Christmas Bonus Act provides that every employer will be required to pay an annual bonus to each employee that worked seven hundred (700) hours or more during the period of twelve (12) months comprised between October 1st of the preceding year and September 30th of the current year.

Employers with up to fifteen (15) employees must pay their qualified employees a bonus equal to 3.00% of the employee's earned wages during the qualifying period, up to \$10,000 of wages (maximum bonus \$300). Employers with sixteen (16) or more employees must pay their qualified employees a bonus equal to 6.00% of the employee's earned wages during the qualifying period, up to \$10,000 of wages (maximum bonus \$600). The total amount of bonuses required to be paid by an employer will not exceed 15% of its profits derived during the qualifying period.

The Christmas Bonus Act must be paid to employees between December 1st and December 15th of the current year. An alternate payment period could be applicable provided that the employer and employees agree to it in writing, the payment date is before December 31st of the current

year, and the change in payment date is notified to the Department of Labor and Human Capital before November 30th of the current year.

Mandatory bonuses are considered additional compensation to employees and are subject to applicable withholdings.

Variable Compensation (Balanced Score Card)

In addition, some employees are measured on goals for example, strategic goals, loan production and new deposit generation under a Balanced Score Card (“BSC”), whose efforts yield in generation of business and initiatives assigned by management for the Bank. For additional details on criteria and bonus potential, refer to the BSC assigned. In order to earn BSC bonus potential the following conditions must be met:

- The performance criteria included in the Balanced Score Card are met and satisfied by the employee, which is determined solely by Executive Management.
- The employee is employed at the time of distribution and in good standing with the Bank.

Banesco USA reserves the right to interpret, apply, alter, withdraw, and modify all or some of the terms of the Balanced Score Card, in whole or in part, at any time with or without advance notice.

Bonuses are considered additional compensation to employees and are subject to applicable withholdings.

Leave of Absence

The Bank offers paid time-off (PTO), vacation, sick and personal leave benefits to all eligible employees. Please note that all unused paid time-off (PTO), vacation, sick and personal leave must be exhausted before an unpaid leave of absence is granted. Paid time-off (PTO), Vacation, Personal, and Sick days are paid at the employee’s current base pay rate and are not considered as worked time, and, therefore, are not included in overtime compensation or any special form of compensation.

Holidays

Florida Employees

The Bank recognizes the following holidays with pay for full-time employees.

New Year’s Day	Juneteenth	Veteran’s Day
Martin Luther King Jr. Day	Independence Day	Thanksgiving Day
President’s Day	Labor Day	Christmas Day
Memorial Day	Columbus Day	

Eligible employees will receive one (1) day’s pay at their regular rate when a holiday falls or is celebrated on a workday. Eligible employees who are required to work on a holiday will receive one (1) day’s pay at their regular pay plus the hours worked during the holiday.

If a holiday falls during an employee’s time-off period, the employee may elect to add a day to either the beginning or end of their time-off period.

Puerto Rico Employees

The Bank recognizes the following holidays with pay for full-time employees.

New Year’s Day	Memorial Day	Columbus Day
Epiphany	Juneteenth	Veteran’s Day
Martin Luther King Jr. Day	Independence Day	Discovery Day
President’s Day	Constitution Day	Thanksgiving Day
Good Friday	Labor Day	Christmas Day

Eligible employees will receive one (1) day’s pay at their regular rate when a holiday falls or is celebrated on a workday. Eligible employees who are required to work on a holiday will receive one (1) day’s pay at their regular pay plus the hours worked during the holiday.

If a holiday falls during an employee’s vacation period, the employee may elect to add a day to either the beginning or end of their vacation.

Paid Time-Off (PTO) Days

Florida Employees

The bank recognizes that employees have diverse needs for time-off from work and we have established the Paid Time-Off (PTO) policy to meet those needs. Employees are accountable and responsible for managing their own PTO days to allow adequate days for vacation, illness, appointment, emergencies or other situations that require time off from work. The PTO program is offered to employees who are full-time employees.

PTO days will be accumulated after the completion of the fifth (5th) year of service in the following year, the accumulation of PTO days is stipulated in the following table:

Employee Status	0 – 5 Years of Service	6 – 10 Years of Service	11+ Years of Service
Executive Management	30	35	40
Exempt (Salary)	25	30	35
Non-Exempt (Hourly)	20	25	30

Exempt employees who will be absent for four (4) hours or more during a workday are required to take a full PTO day. Absence of less than four (4) hours during a workday does not require use of a PTO day.

Non-exempt employees may use PTO days in four (4) hour and eight (8) hour increments. Partial day absences may be covered with a four (4) hour PTO day.

Schedule PTO days must be scheduled at least ten (10) business days in advance. Employees may schedule up to a maximum of twenty (20) consecutive business days during a period of time. Generally, time-off will be granted in accordance with departmental staffing needs. Priority may be granted by seniority and certain exceptions may apply. Although we will attempt to accommodate a timely time-off request, we cannot guarantee that such a request will be approved. The Bank and Executive Management reserve the right to designate periods of time where no time-off will be permitted due to operational needs of each department.

Unscheduled PTO days are unforeseen time-off days. Employees must call their immediate supervisor directly, each day of their absence, as far in advance as possible. If their supervisor is not available, the Human Capital Department should be contacted. In case of an emergency, if an employee is unable to make the call personally, a family member should contact the immediate supervisor. The employee must call in each and every day during an absence unless otherwise instructed by the supervisor. If an employee has more than three (3) consecutive unscheduled PTO days, due to illness or injury, the Bank will require that, prior to the employee returning to work, a physician must provide a certification verifying that the employee is able to return to work. Unscheduled absences will be monitored, and employees will be counseled when the frequency of unscheduled absences adversely affects the operations of the department.

Exceptions to these requirements are allowed when an employee is on a leave due to FMLA, Parental Leave or any other Leave of Absences. Those employees on Parental Leave may have the option of maintaining PTO days to use after they return from their leave.

The following is the requirement for scheduling the PTO days:

- Executives Management must take ten (10) consecutive business days off each calendar year inclusive of business holidays.
- Exempt employees must take ten (10) consecutive business days off each calendar year inclusive of business holidays.
- Non-exempt employees must take five (5) consecutive business days off each calendar year inclusive of business holidays.

Exceptions to this policy must be approved by the Executive of the department and submitted to the Human Capital Department prior to December 31st of the current year.

For new hires, after the completion of the ninety (90) day introductory period, employees are entitled to take accrued PTO days, which will be accumulated retroactively to the hire date. Time-off taken prior to the completion of the ninety (90) day introductory period will be considered as unpaid time off.

If an employee changes employment category, the new PTO days will be accrued from the date of the employment change and granted accordingly. Part-time employees who change to full-time employees will be granted seniority of years of service for accrual.

If an employee has PTO days remaining at the end of the calendar year, up to a maximum of two (2) days, can be carried over to the 1st quarter of the next calendar year. If carryover days are not used within the 1st quarter of the next calendar year (Jan 1-March 31), they will be forfeited and will not be monetarily paid.

Employees with a separation of employment will be paid unused accrued PTO days upon separation of service. Paid time-off not accrued will be deducted in the last paycheck. The Bank has the right to cancel any scheduled or unscheduled PTO days during the resignation notice period.

Vacation Days

Puerto Rico Employees

The vacation program is offered to employees who are full-time employees who are scheduled to work and maintain at least 115 hours per month. Vacation days are accrued and taken in eight (8) hour increments. The accumulation of vacation days is stipulated in the following table:

Employee Status	1st Year Vacation	Maximum Vacation Days
Executive Management	20	30
Officers	15	25
Staff	15	20

After the first year of employment, one (1) vacation day will be accumulated after the preceding year in January, for each year of service thereafter, until the maximum vacation days are reached.

Vacation must be requested in advanced and approved by the immediate supervisor at least thirty (30) days from the first day of the desired vacation period. Generally, vacations will be approved in accordance with departmental staffing needs, priority may be granted by seniority, and certain exceptions may apply. Although we will attempt to accommodate a timely vacation request, we cannot guarantee that such a request will be approved. The Bank and Executive Management reserves the right to designated periods of time where no vacations will be permitted due to operational needs of each department.

Exceptions to these requirements are allowed when an employee is on a leave due to FMLA, Parental Leave or any other Leave of Absences.

The following is the policy of scheduling PTO days:

- Executives Management must take ten (10) consecutive business days off each calendar year inclusive of business holidays.
- Officers must take ten (10) consecutive business days off each calendar year inclusive of business holidays.
- Staff employees must take five (5) consecutive business days off each calendar year inclusive of business holidays.

Exceptions to this policy must be approved by the Executive of the department and submitted to the Human Capital Department prior to December of the current year.

For new hires, after the completion of the ninety (90) day introductory period, employees are entitled to take accrued vacation, which will accumulate retroactively to the hire date. Time-off taken prior to the completion of the ninety (90) day introductory period will be considered as unpaid time off.

If an employee changes employment category, the new vacation days will be accrued from the date of the employment change and granted accordingly. Part-time employees who change to full-time employees will be granted seniority of years of service for vacation accrual.

Unused vacation time will not be carried over to the next calendar year. If an employee has vacation time remaining at the end of the calendar year, up to a maximum of five (5) vacation days, it may be paid out at the end of the current calendar year.

Employees with a separation of employment will be paid unused accrued vacation upon separation of service. Vacation days not accrued will be deducted in the last paycheck. The Bank has the right to cancel any scheduled or unscheduled PTO days during the resignation notice period.

Personal Days

Puerto Rico Employees

The Bank provides full-time employees with two (2) personal days per calendar year, which may be taken in eight (8) hour increments with the approval of their supervisor.

Personal day must be requested in advanced and approved by immediate supervisor at least fifteen (15) days from the personal day. Generally, personal days will be approved in accordance with departmental staffing needs. Priority may be granted by seniority, and certain exceptions may apply. Although we will attempt to accommodate a timely personal day request, we cannot guarantee that such a request will be approved.

For new hires, after the completion of the ninety (90) day introductory period, employees are entitled to take an accrued personal day, which will accumulate retroactively to the hire date.

Unused personal days may not be carried over to the following year. In separation of employment, unused personal days will not be paid out. Personal days not accrued will be deducted in the last paycheck.

Sick Days

Puerto Rico Employees

The Bank offers paid sick leave for all full-time employees for periods of temporary absence due to illness or injuries. Eligible employees will be granted sick leave benefits up to a maximum of twelve (12) days per calendar year. Sick leave benefits are intended to provide time-off in the event of illness or injury to the employee or an immediate family member and may not be used for any other absence. Absences without notification can be extremely disruptive to both the flow of work in the Bank and to our customers.

Employees unable to report to work due to illness must call their immediate supervisor directly, each day of their absence, as far in advance as possible. If their supervisor is not available, the Human Capital Department should be contacted. In case of an emergency, if an employee is unable to make the call personally, a family member should contact the immediate supervisor. The employee must call in each and every day during an absence unless otherwise instructed by the supervisor.

If an employee is absent for more than three (3) consecutive days due to illness or injury, the Bank will require that, prior to the employee returning to work, a physician must provide a certification verifying that the employee is able to return to work.

Exempt employees who will be absent for four (4) hours or more during a workday are required to take a full sick day. Absence of less than four (4) hours during a workday does not require use of a sick day.

Non-exempt employees may use sick day in four (4) hour and eight (8) hour increments. Partial day absences may be covered with a four (4) hour sick day.

For new hires, after the completion of the ninety (90) day introductory period, employees are entitled to take accrued sick, which will accumulate retroactively to the hire date. Time-off taken prior to the completion of the ninety (90) day introductory period will be considered as unpaid sick time off.

Unused sick days may be carried over from one year to the next up to a maximum of fifteen (15) days. In separation of employment, unused sick days will not be paid out. Sick days not accrued will be deducted in the last paycheck.

Leave Your Mark Days

Through our employee recognition platform, you can redeem your accumulated points for additional paid days off. There are a few conditions to redeem these days:

- Request time off with your manager and receive approval to assure that your absence does not affect the day to day of your department.
- If you are redeeming the birthday incentive, it must be taken within the work week of your birthday. If your birthday falls on a holiday or a weekend, you can choose Friday or Monday.
- LYM days cannot be redeemed in the interim of a resignation.

There is a maximum of 2 LYM Days per calendar year that can be taken per employee, per year (including birthday).

Jury Duty

Florida Employees

The Bank encourages employees to fulfill their civic responsibilities by serving jury duty when required. If you are an eligible employee and you are called to jury duty you will be granted time off, with pay, to fulfill such obligations. If you are a part-time employee, you will be compensated for time served on your regularly scheduled workdays and hours.

Employees are required to submit a copy of the summons to the immediate supervisor and Human Capital at least five (5) working days before the jury service begins. Employees are expected to keep management informed of the expected length of your jury duty and report for work whenever the court schedule permits.

Puerto Rico Employees

The Bank encourages employees to fulfill their civic responsibilities by serving jury duty when required. The employee on jury duty is entitled to paid leave up to a maximum of fifteen (15) working days and to any jury duty pay for daily appearances provided by the Government. If jury duty extends beyond fifteen (15) days, the employee is entitled to credit his or her time for jury duty to his or her vacation leave. The employee must notify the employer that he or she has been called to jury duty at least five (5) days in advance in order to receive the benefits. The employee must also give the employer a certification from the court clerk that he or she was called to jury duty. In Puerto Rico, work reinstatement shall be requested by the employee as soon as possible and never later than within forty-eight (48) hours following the termination of jury duty.

Witness Leave

Puerto Rico Employees

Puerto Rico law provides that upon meeting several requirements, employees summoned as witnesses in criminal cases must continue to receive their regular compensation (including fringe benefits) for the time spent in the proceedings. There are no statutes providing for compensated witness leave in civil cases.

Normally, the employee shall give notice at least two (2) days before his or her absence and, after the witness duty ends, he/she shall give the Bank a court certification of his or her attendance.

Voting Leave

In the event an employee does not have sufficient time outside of working hours to vote in a statewide election, if required by state law, the employee may take off enough working time to vote. Such time will be paid if required by state law. This time should be taken at the beginning or end of the regular work schedule. Where possible, your supervisor should be notified at least two days prior to the voting day.

Bereavement Leave

Bereavement leave with pay will be granted in the event of a death in an employee's immediate family member. The Bank will pay during a leave of five (5) working days within the first thirty (30) days of the passing.

The Bank defines "immediate family" as spouse, domestic partner, child, parent and/or stepparent, sibling, grandparent, grandchild, spouse's parent, spouse's child, spouse's siblings and child's spouse.

Bereavement leave will be granted unless there are unusual business needs or staffing requirements. Under appropriate circumstances and with advance approval, employees may be allowed to use vacation time to attend the funeral of those who are not listed as members of the immediate family or as additional time off, if necessary.

Personal Leave of Absence

If you are ineligible for any other leave of absence, Banesco USA may grant you a personal leave of absence with or without pay. A written request for a personal leave should be presented to management at least two (2) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and

you are not eligible for FMLA or any other State leave law, medical certification also must be submitted along with a certificate for a return to work. Your request will be considered on the basis of staffing requirements, as well as your performance and attendance records. Normally, a leave of absence will be granted for a period of up to eight (8) weeks. Under unusual circumstances a personal leave may be extended if, prior to the end of your leave, you submit a written request for an extension to the Human Capital department for approval.

When you anticipate your return to work, please notify management of your expected return date. This notification should be made at least one (1) week before the end of your leave.

Upon completion of your personal leave of absence, the Bank will attempt to return you to your original job, or to a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of your availability to return to work, failure to return to work when notified, or your continued absence from work beyond the time approved by the Bank will be considered a voluntary resignation of your employment.

Lactation Breaks

Florida Employees

For up to one (1) year after a child's birth, any employee who is breastfeeding her child will be provided reasonable break times as needed to express breast milk for her baby. The Bank will designate a private area for this purpose. Breaks of more than twenty (20) minutes in length will be unpaid, and the employee should indicate this break period on her time record.

Please advise the Human Capital Department if you will need lactation breaks to make the necessary accommodations.

Puerto Rico Employees

An employee who returns from her parental leave has the right to breastfeed her baby or express milk for one (1) hour of each full working day. This hour may be divided into two (2) 30-minute breaks, or three (3) 20-minute break in a designated area at work. The breastfeeding leave shall have a maximum duration of twelve (12) months from the date the employee has returned to work after her parental leave. In order to enjoy breastfeeding leave, the employee must present a medical certificate during the infant's fourth (4th) and eighth (8th) month of age, which certifies that the working mother is breastfeeding her baby.

Please advise the Human Capital Department if you will need lactation breaks to make the necessary accommodations.

Parental Leave

Puerto Rico Employees

Act No. 3 of March 13, 1942, P.R. Laws Ann. tit. 29 §§467-74 (Act No. 3), provides paid maternity leave for a pregnant employee for the birth of a child. Under Act No. 3 a pregnant employee is generally entitled to eight (8) weeks of maternity leave. The employee must present a medical certificate indicating that she is pregnant and the estimated date of birth. The leave is comprised of four (4) weeks of prenatal leave and four (4) weeks of postnatal leave. However, employees may remain at work up to one (1) week prior to the estimated date of birth, provided that she presents a medical certificate which authorizes her to work up to that time. An employee may also return to work as early as two (2) weeks after giving birth, if she presents a medical certificate from her doctor certifying that she is able to return to work. If the date of birth is delayed, the employee may continue on prenatal leave until the birth of the child without affecting the postnatal leave. Also, if post-natal complications arise, maternity leave may be extended up to an additional 12 weeks of unpaid leave.

Act No. 3 also protects pregnant employees from discrimination and dismissal under certain circumstances. Act No. 3 expressly provides that an employee may not be dismissed due to diminished productivity or a reduction in the quality of work insofar as these reasons will not be considered just cause for termination. Act No. 3 also grants pregnant employees reinstatement rights. Therefore, unless the employee's job has been eliminated for just cause, the employee must be reinstated in the same position that she occupied prior to commencing her maternity leave.

If an employer is found liable for discriminating against an employee due to pregnancy, it will be responsible for double compensatory damages. The employer may also be found guilty of a misdemeanor.

Florida Employees

Parental leave under this policy is an additional paid leave associated with the birth of an employee's own child or the placement of a child with the employee in connection with adoption. This policy will run concurrently with Family and Medical Leave Act (FMLA) leave and/or Personal Leave awarded, as applicable. Parental leave is not charged against the employee's other paid leave credits.

Eligibility

Employees are eligible for parental leave if they:

- Have given birth to or are the non-childbearing biological parent of a newborn child; or
- Have adopted a child (age 17 and younger); and
- Have worked for the Bank for at least 12 months; and
- Are a full-time permanent employee at the time of the event.

Amount, Time Frame and Duration

The number of paid days received is as follows:

- Childbearing Parent Leave: 30 business days (6 Weeks), immediately following birth
- Non-childbearing Parent Leave: 10 business days (2 Weeks), within 20 weeks of birth/placement

Multiple births and/or adoptions (e.g., the birth of twins or adoption of siblings) does not increase the total amount of paid parental leave granted for that event. In addition, in no case will an employee receive more than the allotted weeks of paid parental leave in a rolling 12-month period. Any unused paid parental leave will be forfeited at the end of the allotted time frame and unused paid parental leave will not be paid upon termination.

Exclusions

Adoption of a spouse's child is excluded from this policy. Temporary employees are not eligible for paid parental leave under this policy.

Coordination with Other Policies

Paid parental leave taken under this policy will run concurrently other Leaves. Employees have the option of maintaining up to a maximum of fifteen (15) PTO/vacation days to use after they return from their leave.

Requirements for Obtaining Paid Leave

The employee must provide a 30 days' notice of the requested leave (or as much notice as practicable if the leave is not foreseeable) to the Human Capital department. In addition, employee must provide birth/placement records within 2 weeks of event.

After the corresponding weeks of parental leave have been exhausted, subsequent leave will be covered under appropriate policies. After paid parental leave is exhausted, the employee is required to apply any other available paid leave, which will also run concurrently with other Leaves.

Military Leave of Absence**Florida Employees**

Banesco USA is committed to protecting the job rights of employees absent on military leave. If you are called into active military service or you enlist in the uniformed services, you will be eligible to receive an unpaid military leave of absence and all the benefits provided by the Uniformed Services and Employment and Reemployment Rights Act. To be eligible for military leave, you must provide management with advance notice of your service obligations unless you are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable for you to provide such notice. Provided your absence does not exceed applicable

statutory limitations, you will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws.

Employees requesting leave for military duty should contact the Human Capital Department to request leave as soon as they are aware of the need for leave. For request forms and detailed information on eligibility, employee rights while on leave and job restoration upon completion of leave please contact the Human Capital Department.

Puerto Rico Employees

Banesco USA is committed to protecting the job rights of employees absent on military leave. Eligible employees; active military servicemen and women have the right to receive from their public or private employer the difference between their net salary and the net military salary they receive for their active service in the military. In order to qualify for this benefit, employees must be active service members in any of the following: Army; Navy; Air Force; Marine Corps; Coast Guard; Corps of the National Oceanic and Atmospheric Administration -NOAA Corps; U.S. Public Health Service (PHS) Corps; the Army Corps of Engineers; and the National Disaster Medical System (NDMS). Temporary employees and employees under a probationary contract are not eligible for this benefit.

Furthermore, the spouse and dependent (minors or permanently disabled) children of any serviceman or woman employee who dies, disappears, or is captured during active service have the right to receive from their spouse or parent's public employer the total amount of their net salary for a maximum period of twelve (12) months beginning in the month following said death, disappearance or capture.

Upon return from duty, employees will have reinstatement rights under certain conditions. For instance, upon return from military service, the employee, depending of the period of service and subject to other requirements, may be entitled to reinstatement to the position of employment in which the person would have been employed had his/her continuance in the employment not been interrupted by military service or to the same or similar position as the one employed at the time of the leave. Furthermore, the returning employee may have preference in hiring and promoting decisions of the Company as well. For instance, eligible employees will receive 10 added points, or an additional 10% (whichever is greater) applied to the results of any exam required for hiring or promotion, if any. The Company will also allow qualifying employees who missed any such exams the opportunity to take them if the employee so requests within one hundred eighty (180) days of returning to work. Moreover, the Company may credit any functions performed during active military service that are the same or similar to those they perform in their civilian job as work experience for the purposes of employee performance evaluations. Credit may also be given as required for any completed military training courses that relate to their civilian job when conducting employee performance evaluations.

If you are required to attend yearly Reserves or National Guard duty, you can apply for an unpaid temporary military leave of absence not to exceed the number of days allowed by law (including

travel). You should give management as much advance notice of your need for military leave as possible so that we can maintain proper coverage while you are away.

Employees requesting leave for military duty should contact Human Capital Department to request leave as soon as they are aware of the need for leave. For request forms and detailed information on eligibility, employee rights while on leave and job restoration upon completion of leave please contact the Human Capital Department.

Family and Medical Leave

Florida Employees

Banesco USA complies with the Family and Medical Leave Act of 1993 (FMLA). The FMLA requires employers with fifty (50) or more employees to provide eligible employees with unpaid leave. There are two types of leave available, including the basic twelve (12) workweeks leave entitlement (Basic FMLA Leave), as well as the military family leave entitlements (Military Family Leave) described in this policy.

Eligibility for FMLA Leave

Employees are eligible for FMLA leave if they:

- Have worked for the Bank for at least 12 months;
- Have worked at least 1,250 hours for the Bank during the 12 calendar months immediately preceding the request for leave; and
- Are employed at a work site that has 50 or more employees within a 75-mile radius.

Basic FMLA Leave

Eligible employees may take up to twelve (12) workweeks of leave during a twelve (12) month period as specified herein under FMLA. We use a rolling twelve (12) month period measured backwards from the date the employee uses FMLA leave when available FMLA is calculated. Employees who meet the eligibility requirements described above are eligible to take up to twelve (12) workweeks of unpaid leave during any twelve (12) month period for one of the following reasons:

1. To care for the employee's son or daughter during the first 12 months following birth;
2. To care for a child during the first 12 months following placement with the employee for adoption or foster care;
3. To care for a spouse, son, daughter, or parent ("covered relation") who has a serious health condition;
4. For incapacity due to the employee's pregnancy, prenatal medical or childbirth; or
5. Because of the employee's own serious health condition that renders the employee unable to perform the essential functions of his or her position.

Married Couples

In cases where a married couple is employed by the Bank, the two (2) spouses together may take a combined total of 12 workweeks leave during any 12-month period for reasons 1 and 2, or to care for the same individual pursuant to reason 3.

Serious Health Condition

For purposes of FMLA, serious health condition entitling an employee to FMLA leave means an illness, injury, impairment or physical or mental condition that involves inpatient care as defined in §825.114 or continuing treatment by a health care provider as defined in §825.115.

The term incapacity means inability to work, attend school or perform other regular daily activities due to the serious health condition, treatment therefore, or recovery therefrom.

The term treatment includes (but is not limited to) examinations to determine if a serious health condition exists and evaluations of the condition. Treatment does not include routine physical examinations, eye examinations, or dental examinations. A regimen of continuing treatment includes, for example, a course of prescription medication (e.g., an antibiotic) or therapy requiring special equipment to resolve or alleviate the health condition (e.g., oxygen). A regimen of continuing treatment that includes the taking of over-the-counter medications such as aspirin, antihistamines, or salves; or bed rest, drinking fluids, exercise, and other similar activities that can be initiated without a visit to a health care provider, is not, by itself, sufficient to constitute a regimen of continuing treatment for purposes of FMLA leave.

Conditions for which cosmetic treatments are administered (such as most treatments for acne or plastic surgery) are not serious health conditions unless inpatient hospital care is required or unless complications develop. Ordinarily, unless complications arise, the common cold, the flu, earaches, upset stomach, minor ulcers, headaches other than migraine, routine dental or orthodontia problems, periodontal disease, etc., are examples of conditions that do not meet the definition of a serious health condition and do not qualify for FMLA leave. Restorative dental or plastic surgery after an injury or removal of cancerous growths are serious health conditions provided all the other conditions of this regulation are met. Mental illness or allergies may be serious health conditions, but only if all the conditions of this section are met.

Military Family Leave

There are two types of Military Family Leave available.

1. **Qualifying exigency leave** –Employees meeting the eligibility requirements described above may be entitled to use up to 12 weeks of their Basic FMLA Leave for a qualifying exigency while the employee’s spouse, son, daughter, or parent (the military member or member) is on covered active duty or call to covered active-duty status (or has been notified of an impending call or order to covered active duty).

For Regular Armed Forces members, “covered active duty or call to covered active-duty status” means duty during the deployment of the member with the Armed Forces to a foreign country (outside of the United States, the District of Columbia, or any territory or possession of the United States, including international waters).

For a member of the Reserve components of the Armed Forces (members of the National Guard and Reserves), “covered active duty or call to covered active-duty status” means duty during the deployment of the member with the Armed Forces to a foreign country under a federal call or order to active duty in support of a contingency operation.

Qualifying exigencies may include:

- Short-notice deployment (up to 7 days of leave)
 - Attending certain military events
 - Arranging for alternative childcare
 - Addressing certain financial and legal arrangements
 - Periods of rest and recuperation for the service member (up to 5 days of leave)
 - Attending certain counseling sessions
 - Attending post-deployment activities (available for up to 90 days after the termination of the covered service member’s active-duty status)
 - Other activities arising out of the service member’s active duty or call to active duty and agreed upon by the Bank and the employee
2. **Leave to care for a covered servicemember.** There is also a special leave entitlement that permits employees who meet the eligibility requirements for FMLA leave to take up to 26 weeks of leave during a single 12-month period if the employee is the spouse, son, daughter, parent, or next of kin caring for a covered military servicemember or veteran recovering from a serious injury or illness, as defined by FMLA’s regulations

For a current member of the Armed Forces, including a member of the National Guard or Reserves, the member must be undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status; or is otherwise on the temporary disability retired list, for a serious injury or illness.

For a covered veteran, he or she must be undergoing medical treatment, recuperation or therapy for a serious injury or illness. Covered veteran means an individual who was a member of the Armed Forces (including a member of the National Guard or Reserves) and was discharged or released under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible employee takes FMLA leave to care for the covered veteran. An eligible employee must begin leave to care for a covered veteran within five years of the veteran’s active-duty service, but the single 12-month period may extend beyond the five-year period.

Use of leave

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer’s operations. Military Family Leave due to qualifying exigencies may also be taken on an intermittent basis.

Leave may not be taken on an intermittent basis when used to care for the employee's own child during the first year following birth, or to care for a child placed with the employee for foster care or adoption, unless both the employer and employee agree to such intermittent leave.

Pay, Benefits, and Protections during FMLA Leave

Leave is unpaid. Family medical leave is unpaid if leave is taken because of an employee's own serious health condition (although employees may be eligible for short or long-term disability payments and/or workers' compensation benefits under those insurance plans).

Substitution of paid time off for unpaid leave. If an employee does not choose to substitute accrued paid leave, the employer may require the employee to substitute accrued paid leave for unpaid FMLA leave, as determined by the terms and conditions of the Bank's leave policy.

If an employee requests leave because of birth, adoption, or foster care placement of a child, any accrued paid vacation personal leave or family leave first will be substituted for unpaid family/medical leave.

If an employee requests leave because of the employee's own serious health condition, or to care for a covered relation with a serious health condition, any accrued paid vacation personal leave, family or medical/sick leave first will be substituted for any unpaid family/medical leave.

The substitution of paid leave time for unpaid leave time does not extend the 12-week leave period. Furthermore, in no case can the substitution of paid leave time for unpaid leave time result in the receipt of more than 100 percent of an employee's salary. An employee's family medical leave runs concurrently with other types of leave, i.e., paid vacation.

For leave taken for a qualifying exigency, an employee may elect, or the employer may require substitution of paid personal, vacation, or family leave time for unpaid FMLA leave. The same rules apply as if the employee took FMLA leave to care for a family member with a serious health condition or for the birth or placement of a child.

For leave to care for a seriously injured or ill family member in the military an employee may substitute paid personal, vacation, family leave, sick, or medical leave time for unpaid FMLA leave. The same rules apply as if the employee took leave for his or her own serious health condition. The Bank will not provide paid sick leave or paid medical leave in any situation in which the Bank would not normally provide any such paid leave.

Workers' comp leave runs concurrent with FMLA. For a leave due to a workers' comp injury the employee will be placed on FMLA leave automatically without a specific request from the employee (medical certification) if the injury meets FMLA criteria.

Medical and other benefits. During an approved family medical leave, the Bank would maintain the employee's health benefits as if the employee continued to be actively employed. If paid leave is substituted for unpaid family medical leave, the Bank will deduct the employee's portion of the health plan premium as a regular payroll deduction. If leave is unpaid, the employee must pay his or her portion of the premium directly to the Bank.

Health insurance benefits will not be maintained after the twelve (12) workweeks FMLA period expires if the employee does not return to work; however, the employee will be entitled to his or her applicable rights under COBRA.

During FMLA leave, the Bank must maintain the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. Seniority and employment benefits do not accumulate during an FMLA, but any such benefits that have accumulated before the leave is taken will not be lost.

Return to job at end of FMLA leave. Upon return from FMLA leave, employees will be restored to their original or equivalent position with equivalent pay, benefits, and other employment terms. If an employee fails to return to work on the day noted on the leave request (or on such date subsequently agreed for return), it will be considered a voluntary resignation by the employee.

A leave request may be investigated at the discretion of the Bank and any deliberate falsification of an FMLA leave request or medical certification may result in disciplinary action, up to and including termination. If the employee has any questions about their rights or responsibilities under the FMLA, ask the Human Capital Department.

Employee Responsibilities When Requesting FMLA Leave. If the need to use FMLA leave is foreseeable, the employee must give the Bank at least thirty (30) days' prior notice of the need to take leave. When thirty (30) days' notice is not possible, the employee must give notice as soon as practicable (within 1 or 2 business days of learning of the need for leave except in extraordinary circumstances). Failure to provide such notice may be grounds for delaying the start of the FMLA leave.

Whenever possible, requests for FMLA leave should be submitted to the employee's worksite using the Employee Application for Leave form available from the Human Capital Department. In addition, FMLA leave should be report to Careworks at (888) 436-9530 as soon as possible.

If the need for leave is not foreseeable, employees are required to provide as much notice as soon as practicable under the facts of the particular case. An employee requiring unforeseeable leave must, absent extraordinary circumstances, call his or her direct supervisor and provide sufficient information regarding the employee's need for leave to support a request for FMLA leave. It generally should be practicable for the employee to provide notice of leave within one business day.

When submitting a request for leave, the employee must provide sufficient information for the company to determine if the leave might qualify as FMLA leave and provide information on the anticipated date when the leave would start as well as the duration of the leave. Calling in "sick" is not sufficient. Sufficient information may include that the employee is unable to perform job functions; that a family member is unable to perform daily activities; that the employee or family member needs hospitalization or continuing treatment by a healthcare provider; or the circumstances supporting the need for military family leave. Employees also must inform the company if the requested leave is for a reason for which FMLA leave was previously taken or

certified. Employees also will be required to provide a certification and periodic recertification supporting the need for leave.

Employer Responsibilities

When an employee requests leave, the Bank will inform the employee whether he or she is eligible under the FMLA. If the employee is eligible, the employee will be given a written notice that includes details on any additional information he or she will be required to provide. If the employee is not eligible under the FMLA, the Bank will provide the employee with a written notice indicating the reason for ineligibility.

If leave will be designated as FMLA-protected, the Bank will inform the employee in writing and provide information on the amount of leave that will be counted against their 12 or 26 workweeks entitlement.

Medical Certification

If the employee is requesting leave because of the employee's own or a covered relation's serious health condition, the employee and the relevant healthcare provider must supply appropriate medical certification. Employees will obtain a Medical Certification form from the Human Capital Department. When the employee requests leave, the Bank will notify the employee of the requirement for medical certification and when it is due (no more than 15 days after you request leave). If the employee provides at least 30 days' notice of medical leave, he or she should also provide the medical certification before leave begins.

Failure to provide requested medical certification in a timely manner may result in denial of leave until it is provided. The Bank, at its expense, may require an examination by a second healthcare provider designated by the Bank, if it reasonably doubts the medical certification initially provided. If the second healthcare provider's opinion conflicts with the original medical certification, the Bank, at its expense, may require a third, mutually agreeable, healthcare provider to conduct an examination and provide a final and binding opinion.

The Bank may require subsequent medical recertification. Failure to provide requested certification within 15 days, except in extraordinary circumstances, may result in the delay of further leave until it is provided. Employees may also be required to provide a fitness-for-duty certification upon return to work, or during intermittent leave, as required.

Intermittent and Reduced-Schedule Leave

Leave because of a serious health condition, or either type of family military leave may be taken intermittently (in separate blocks of time due to a single health condition) or on a reduced-schedule leave (reducing the usual number of hours worked per workweek or workday) if medically necessary. If leave is unpaid, the Bank will reduce the employee's salary based on the amount of time actually worked. In addition, while an employee is on an intermittent or reduced-schedule leave, the Bank may temporarily transfer the employee to an available alternative position that better accommodates the recurring leave, and which has equivalent pay and benefits.

Puerto Rico Employees

Banesco USA is unable provide the employees in Puerto Rico Branch with Family and Medical Leave benefits due not meeting the requirements of having fifty (50) or more employees.

Benefits

Group Insurance

All employees that are eligible for benefits will be entitled to elect benefits at the Bank on the first day of the following month proceeding date of hire. The following are the plans open for enrollment:

Medical Insurance	Employee Assistance Program
GAP Insurance*	Life Insurance
Dental Insurance	Flexible Spending Account*
Vision Insurance	Supplemental Insurance
Short-Term Disability	Long-Term Disability

*Applies to Florida Employees Only

For more information regarding the benefits programs, please refer to the Bank's Summary Plan, which were provided to employees upon hire or contact the Human Capital Department.

The requirements, terms, and conditions of each applicable official benefit plan document control over any conflicts or ambiguities between the information provided in this Employee Handbook and the benefit plan document. Many of these benefits have strict deadlines for enrollment.

The Bank reserves the right to add, revise, or rescind any or all the benefits summarized in the Employee Handbook in its sole discretion at any time.

Benefits Continuation (COBRA)

The Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under the Bank's health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment other than for gross misconduct, or death of an employee, a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation, and a dependent child no longer meeting eligibility requirements.

Under COBRA, the employee or beneficiary pays the full cost of coverage at the Bank's group rates, plus an administration fee. The Bank's insurance plan administrator provides each eligible employee with a written notice describing rights granted under COBRA and election form when the employee becomes

eligible for coverage under Bank's health insurance plan. The notice contains important information about the employee's rights and obligations. The election form provides the choices for the employee who must choose and return the elections form within 60 days to the administrator as is indicated in the notice.

Workers' Compensation

Florida Employees

The Bank provided comprehensive Workers' Compensation Insurance at no cost to employees, which covers any on the job injuries.

Employees who sustain work-related injuries should inform their supervisor and the Human Capital Department immediately. No matter how minor the on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

Post-Accident/Injury – Individuals who suffer an injury or accident on-the-job or in a work area, will be required to submit to a drug and/or alcohol test.

Puerto Rico Employees

The Bank provided comprehensive Workers' Compensation Insurance with Puerto Rico State Insurance Fund at no cost to employees, which covers any on the job injuries.

Employees who sustain work-related injuries should inform their supervisor and the Human Capital Department immediately. No matter how minor the on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

Post-Accident/Injury – Individuals who suffer an injury or accident on-the-job or in a work area, will be required to submit to a drug and/or alcohol test.

Retirement Plan

All employees who are 21 or older and have completed ninety (90) days of service are eligible to participate in the Bank's 401(K) Retirement Plan. Eligible employees may participate in the 401(k)-plan subject to all terms and conditions of the plan.

The 401(k) Retirement Plan allows you to elect a percentage (%) or dollar amount (\$) of your salary, within the limits of the plan, to defer and provides for self-directed investment of your plan accounts, so you can tailor your own retirement package to meet your individual needs.

Because your deferral to a 401(k) plan is automatically deducted from your pay before federal and state tax withholdings are calculated, you save tax dollars now by having your current taxable amount reduced. The amounts deducted generally will be taxed when they are finally distributed.

Complete details of the 401(k) Retirement Plan are described in the Summary Plan Description provided to eligible employees.

Bank Discounts

Employees (excludes temporary and interns) are eligible to open an account at Banesco USA with no cost and without service charges.

To present debits against insufficient funds on this account is not permitted. As safe keepers of the financial affairs of others, employees must take great care in guarding their own financial affairs and staff members are expected to exhibit good judgment by avoiding even the appearance of impropriety.

Employee accounts are not to be overdrawn. On an exception basis, the EVP, Chief Administrative Officer may grant approval to permit the overdraft, but the employee must clear the item immediately. If an overdraft is created, the Bank may waive the fee as a courtesy, but will be considered on a case-by-case basis.

As an exception, employees will be authorized a maximum of three (3) overdrafts with no charge within one year. If an employee exceeds the maximum five (5) overdrafts allowed per year, the account will be closed automatically.

Upon separation of employment for any reason, the employee checking account will be reclassified as a regular account.

Employee Referrals

Employees who refer an applicant for a position and such applicant is hired will receive a referral bonus.

The following are the program guidelines:

Full-time and part-time employees may participate in the program with the exceptions of Executive Management, Human Capital, Hiring Manager and/or temporary employees.

Employees are ineligible to receive a referral bonus for the following applicants:

- Applicants who worked for Banesco USA (or its affiliates) less than two (2) years before a job application is submitted.
- Banesco USA temporary employees and/or agency temporary employees.

In order to submit for the referral bonus, employee must submit the form to the Human Capital Department within ninety (90) days from the date of the applicant's hire. The table of referral bonus is:

Positions	Referral
Exempt Position	\$3,000 after 90 days
Non-Exempt Position	\$1,500 after 90 days

Training and Development

The Bank recognizes that the skills and knowledge of its employees are critical to the success of the organization. The Bank has developed a training policy in order to provide their employees with the trainings needed to succeed in their current position and future positions.

The Bank will develop specialized internal trainings, instructor led and/or web-based courses in order to enhance and ensure regulatory compliance, functional competencies and corporate initiatives. These internal trainings are monitored by the Human Capital Department and any pass due and/or reported absences are reported to Executive Management. Employees must pass compliance trainings in a maximum of 3 attempts, if not successful a face-to-face training with the subject matter expert will be provided before the end of the year. If employees are not in compliance with mandatory trainings assigned by the Bank, it may result in disciplinary action, up to and including termination.

The Bank also encourages external trainings that are off-site and provide the necessary skills for the position. In order to attend external trainings, external trainings must be approved by your immediate supervisor. After the training, you must inform the Human Capital Department along with the certificate and training materials.

Tuition Reimbursement

The company offers reimbursement incurred by an employee for continuing education through an accredited program that offers growth in an area related to his or her current position. Courses include college credit courses, continuing education unit courses and certification courses and tests. Expenses must be validated by receipts and a copy of the final grade or certification received.

Program	Maximum Annual Reimbursement
CE/ Certificate	\$5,250
Associates	\$5,250
Bachelors	\$8,000
Masters	\$12,000

Eligibility

Must be a full-time employee for at least 12 months with satisfactory performance for the past 12 months.

Coverage

Tuition only (books, supplies, travel, or other expenses not covered).

Reimbursement

Proof of payment and a grade of “C” or above or course completion certificate must be submitted.

Termination

Involuntary: Pre-approved courses will be reimbursed

Voluntary: Pre-approved courses will not be reimbursed, and repayment is required based on the table below:

Years of Service after final reimbursement payment	Amount over \$5,250 (annual) to be Repaid
Less than 6 months	100%
Between 6 months and 18 months	75%
Between 18 months and 24 months	50%

Work Conditions

Code of Ethics and Conduct

For additional information, please refer to the Banesco USA Code of Ethics and Conduct.

Standards of Conduct

The Bank strives to maintain a positive work environment and each employee has an important role in fostering this environment. The following sections will outline the standards of conduct that all employees must abide.

The adherence of the standards of conduct will help ensure a safe and harmonious workplace for all employees. Any misconduct will be subject to disciplinary action, up to and including termination.

Attendance and Punctuality

The Bank expects all employees to attend work regularly and on time. Failure to do so detracts from our ability to serve the needs of our customers and to operate efficiently and causes an unfair burden for those employees who must cover for absent or late employees.

Employees unable to report to work or going to be late must call their immediate supervisor directly, as soon as possible, but no later than the start of the workday. If their supervisor is not available, the Human Capital Department should be contacted. If an employee is unable to make the call personally, a family member should contact the supervisor. The employee will explain the reason for the absence or tardiness and when they expect to report to work. The supervisor must be contacted each day of absence.

Failure to call in, excessive absences or tardiness, or a suspicious pattern of absences will result in disciplinary action, up to and including termination of employment. The Bank reserves the right to require a medical certificate any time excessive absence or a suspicious pattern of absence exists.

If you anticipate the need to leave work early, you should notify your immediate supervisor to request permission.

Unreported absences of three (3) consecutive working days will be considered job abandonment and will be deemed as the employee's voluntary resignation of employment.

Dress Code & Personal Appearance

The Bank's public image is dependent on its employees. Employees are expected to dress in Business Casual attire unless the day's tasks or meetings require Business Attire. We still expect our employees to project a professional image for our customers, potential employees, and visitors. Rule of Thumb – "Dress to Impress". Therefore, the Bank expects neat, clean, tasteful, conservative dress and grooming in the workplace.

Business Attire

The following guidelines apply to business attire:

- **Men:** Business attire includes a long-sleeved dress shirt and dress trousers (not khakis), and dress shoes. For customer facing employees, a jacket is required.
- **Women:** Tailored suits, businesslike dresses, and businesslike shirts and pants worn with or without a blazer and conservative.

Casual Friday's Attire

On Friday's employees will have the opportunity to dress in casual business attire. This casual dress code is intended to allow employees to work comfortably. However, employees are responsible for ensuring their dress and grooming projects a positive image of the Bank.

- **Frontline Staff:** Casual Friday attire consists of a business shirt or bank polo shirt with a jacket and trousers/khakis. Anything else will be considered unacceptable attire.
- **Back-Office Staff:** Casual Friday attire consists of a business shirt or bank polo shirt and jeans (must be clean and free of rips, tears and fraying; may not be excessively tight or revealing). Anything else will be considered unacceptable attire.

Business reasons might require employees to wear formal business attire, a sports jacket or a blazer on casual day. Employees should consider their level of customer and public contact and the types of meetings they are scheduled to attend in determining the type of attire that is appropriate.

Remote Work Attire

Banesco USA's remote dress code policy applies to all employees who are working from any remote location and is designed to help us all provide a consistent professional appearance to our customers and colleagues. Our appearance reflects on ourselves and the company. Because we frequently encounter customers and colleagues while working remote, and because the quality of those interactions impacts how our customers feel about our organization, we expect our team to dress appropriately. The goal is to be sure that we maintain a positive appearance.

Guidelines for Personal Appearance & Attire

Unacceptable clothing includes, but is not limited to:

- Provocative attire, extreme fashion items, athletic clothing, shorts, capris, leggings, mini-skirts, see-through or transparent shirts, extreme cleavage, t-shirts, tank tops, halter tops, hats, extreme high heels, flat sandals without back strap, flip-flops, sneakers, clothing that is too tight or that is not business appropriate.
- Perfumes, colognes and aftershave lotions must be used moderately, as some individuals may be sensitive to strong fragrances or have an allergic reaction.

Banesco USA is confident that employees will use their best judgment regarding attire and appearance. Management reserves the right to determine appropriateness. Any employee who is improperly dressed will be counseled or in severe cases may be sent home to change clothes. Continued disregard of this policy may be cause for disciplinary action.

Solicitation

Persons not employed by the Bank may not solicit or distribute literature in the workplace at any time for any purpose.

The Bank recognizes that employees may have interests in events and organizations outside the workplace. However, employees may not solicit or distribute literature concerning these activities during working hours.

Open Communication

The Bank desires to stimulate open communication, alleviate dissatisfaction, and encourage employees to bring forward complaints or reports of wrongdoing. Employees should not fear retaliation for constructive complaints and questioning, as it is the Bank's sincere desire to keep communication channels open.

Employees are encouraged to communicate ideas or make suggestions to improve the Bank's operations including the work environment, work processes, and new products or services. Making suggestions not only allows employees to have an impact on how business is conducted in the Bank, but it also provides employees the opportunity to help develop to their full potential.

Should an occasion arise where an employee learns of an unethical or illegal act, the Bank encourages the employee to report it to their immediate supervisor or the Human Capital Department. Any employee

who comes forward will have his/her identity kept as confidential as possible and will be protected to ensure that no retaliatory action is taken against the employee.

While communications by the normal supervisory and reporting chain of command are normally preferable, every employee shall use his/her discretion, based on their individual comfort and the circumstances of the situation. Alternative lines of communication are available through the Ethics Hotline (855) 715-2894. The key is to provide the comfort of the person reporting; for it is far more important to learn of the existence of illegal or unethical actions than the communications route followed.

No individual will be intimidated, threatened, coerced, or discriminated against by the Bank for filling a charge or internal complaint or for participating in any type of complaint investigation.

Safety & Security

The health and safety of employees and others on Bank property is of critical concern to Banesco USA. The Bank intends to comply with all health and safety laws applicable to our business. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected. Any suspicion of a concealed danger present on the Bank's premises, or in a product, facility, piece of equipment, process or business practice for which the Bank is responsible should be brought to the attention of management immediately.

Periodically, the Bank may issue rules and guidelines governing workplace safety and health. The Bank may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines, as strict compliance will be expected.

Any workplace injury, accident, or illness must be reported to the employee's Supervisor and Human Capital Department as soon as possible, regardless of the severity of the injury or accident.

Workplace Violence

It is the Bank policy to provide a safe workplace environment for our employees. The purpose of this policy is to minimize the risk of personal injury to employees while at work and to reduce the potential for damage to Bank property.

We wish to stress that the Bank does not expect its employees to acquire expertise in psychology or physically subdue a threatening or violent individual. In fact, the Bank discourages employees from engaging in a physical confrontation with violent or potentially violent individual. However, we do expect employees to exercise reasonable judgment in identifying potentially dangerous situations. When confronted with a potentially violent or dangerous individual and/or situation, all employees are encouraged to learn how to recognize them, and when encountered immediately notify their supervisor and the Human Capital Department. Alternative lines of communication are available through the Ethics Hotline (855) 715-2894.

The following acts and/or behaviors are indicators of potential violence in the workplace: Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in Bank policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or Supervisor; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; demonstrating a propensity to behave and react irrationally.

Puerto Rico employees should refer to the PR Workplace Policies handbook for details on Domestic Violence, Sexual Harassment and Workplace protocols.

Prohibited Conduct

Threats, threatening language, and any other act of aggression or violence made toward or by any employee WILL NOT BE TOLERATED. For purpose of this policy, threats include any verbal or physical harassment, attempts to intimidate, or instill fear in others, bullying, hostile gestures, flashing of concealed weapons, stalking, verbal or physical abuse, or any other hostile, aggressive, or injurious actions toward another individual for the purpose of domination or intimidation.

Procedures for Reporting Workplace Violence

All potentially dangerous situations, including threats, should be immediately reported to your supervisor and/or the Human Capital Department. If you suspect any potential violence from a fellow employee or any other person in the workplace, reporting it is the most important step toward prevention. All threats will be promptly investigated. Reports of threats may be made anonymously. Employees will not be subject to retaliation, intimidation, or discipline as a result of reporting a threat under this policy. If an investigation confirms that an employee committed the violence or threat, the Bank will take swift appropriate corrective action, which may, at the Bank's discretion, include discharge of the offender.

If a reported threat is found, after investigation, that it was made by an employee with malicious intent and knowingly false, under this policy the employee will be subject to disciplinary action, up to and including termination.

Harassment

Non-Harassment

It is Banesco USA's policy to prohibit intentional and unintentional harassment of any individual by another person on the basis of any protected classification including, but not limited to, sex, race, color, national origin, disability, religion, marital status, sexual orientation, status as a covered veteran or age, as well as additional protected categories under Puerto Rico law, including social origin, social condition, political or religious ideology/affiliation, and being a victim or being perceived as a victim of domestic

violence, sexual aggression or stalking. The purpose of this policy is not to regulate our employees' personal morality, but to ensure that in the workplace, no one harasses another individual.

The Bank prohibits not only unlawful harassment, but also other unprofessional and discourteous actions that do not rise to the level of "severe" and "pervasive" necessary to establish a legal claim of harassment. Accordingly, derogatory racial, ethnic, religious, age, sexual orientation, sexual, or other inappropriate remarks, slurs, or jokes will not be tolerated.

Sexual Harassment and Other Forms of Harassment

It is Banesco USA's policy to prohibit harassment of any employee by any Supervisor, employee, customer, or vendor based on sex or gender. The purpose of this policy is not to regulate personal morality within the Bank. It is to ensure that at the Bank all employees are free from sexual harassment. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails text messages, and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment. This kind of behavior is unacceptable at the workplace and in any work-related setting outside the workplace such as during business trips and business-related social events. Other forms of harassment prohibited by law entail adverse employment actions and/or offensive conduct due to an employee's membership in a protected category under applicable federal and state laws.

Puerto Rico employees should refer to the PR Workplace Policies handbook for details on Domestic Violence, Sexual Harassment and Workplace protocols.

Complaint Procedures

If you feel that you have been subjected to conduct which violates this harassment policy, you should immediately report the matter to the Human Capital Department. Alternative lines of communication are available through the Ethics Hotline (855) 715-2894. If you are unable for any reason to contact this person, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be harassment, please contact the Executive Vice President of Operations.

Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating that situation. The Bank cannot correct harassment or discrimination unless it is aware of it. No employee in this organization is exempt from this policy.

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. Violation of this policy will result in disciplinary action, up to and including discharge. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In Confidential

Effective January 1, 2024

addition, the Bank will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. Employees who make complaints in bad faith may be subject to disciplinary action, up to and including discharge.

Workplace Bullying

Banesco USA defines bullying as “repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment.” Such behavior violates the company Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives, that the company will not tolerate bullying behavior. Employees found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration during discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. Banesco USA considers the following types of behavior examples of bullying:

- **Verbal bullying** – Slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Physical bullying** – Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person’s work area or property.
- **Gesture bullying** – Nonverbal threatening gestures or glances that convey threatening messages.
- **Exclusion** – Socially or physically excluding or disregarding a person in work-related activities.

If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to the Human Capital Department. Alternative lines of communication are available through the Ethics Hotline (855) 715-2894.

Productive Work Environment

Drug and Alcohol-Free Workplace

In a commitment to safeguard the health of our employees and to provide a safe working environment for everyone, the Bank has established a Drug and Alcohol-Free Workplace Policy. This policy applies to all employees, all applicants and other individuals who perform work for the Bank.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances, drug paraphernalia or alcohol by an individual anywhere on Bank premises, while on Bank business (whether or not on Bank premises) or while representing the Bank, is strictly prohibited. Employees and other individuals who work for the Bank also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled

substances, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work. This restriction does not apply to responsible drinking of alcohol at business meetings and related social outings.

Disclosure of Criminal Charges and Convictions

All employees are required to immediately (within 48 hours) notify the Bank of any criminal charge(s), accident(s), or conviction(s) for drug or alcohol related offenses while on duty and off duty. Such employees may be subject to discipline, up to and including termination, depending on the circumstances of each individual case and other pertinent considerations, including but not limited to the conviction's impact on the employee's ability to perform the job with the Bank. Violation of this policy will result in disciplinary action, up to and including termination.

The Bank maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history which reflects treatment for substance abuse conditions. We encourage employees to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs or jeopardizes the health and safety of any Bank employee, including themselves.

Testing may occur under the following circumstances

Job Application Process – Applicants for employment at the Bank will be required to take and pass a drug and/or alcohol test prior to being employed.

Reasonable Suspicion – If there is a belief (based on observations, facts and reasonable inferences drawn from those facts in light of experience) that any employee is using drugs or alcohol in violation of this policy, drug and/or alcohol testing will be required. Testing under this provision may be conducted if any of the following factors are believed to be present:

- Observed using, possessing, distributing and/or soliciting drugs;
- Exhibited symptoms of being under the influence;
- Exhibited abnormal conduct or erratic behavior;
- A significant deterioration in work performance; and/or
- Reports from a reliable and credible source.

Post-Accident/Injury – Individuals who suffer an injury or accident on-the-job or in a work area, will be required to submit to a drug and/or alcohol test.

Refusal to Submit to Testing or Tampering with Test Sample

Refusal to submit to a drug and/or alcohol test or any form of tampering with test samples will result in termination for employees or rejection of employment for job applicants. Drug tests

must be completed immediately, however in every case the test must be conducted within 12 hours from notice of the testing requirement (if operating hours of the test collectors permits). Employees not reporting for testing in a timely manner will be terminated. Tampering with a test will be deemed as a refusal to test.

Additionally, if you are injured on-the-job, refusal to test or positive results will be the basis for your forfeiture of eligibility for medical and indemnity benefits under the Workers' Compensation Act.

List of Tested Drugs

The Company will test job applicants and employees for all substances identified in Florida's Work-Free Workplace Act, including any or all of the following: Amphetamines, Cannabis, Cocaine, Phencyclidine, and Opiates.

Smoking

It is the policy of the Bank to prohibit smoking on the Bank's premises in order to provide and maintain a safe and healthy work environment for all employees, customers and visitors, except in designated areas. Smoking includes the use of e-cigarettes and/or vapor cigarettes.

Travel Policy

This policy applies to all work-related travel (domestic and abroad) and off-site visits undertaken by Banesco's employees.

Banesco's business depends on certain employees' ability to safely travel and arrive at their destination ready to work. Travel requires advance planning, care, and common sense. Travel abroad could potentially expose Banesco employees to certain health and safety hazards arising specifically from the travel and/or the conditions within the country or area visited.

For some destinations, Banesco must specifically authorize travel, particularly during the following situations:

- Security risks and travel to areas of political instability.
- Natural disasters and extreme climates.
- Areas of endemic and/or epidemic disease.

Employees are not expected or required to travel to any country or area where there are legitimate concerns about personal health or safety. Employees will not be permitted to undertake work-related travel to any country or area where Banesco advises against such travel.

Employees should seek their supervisor's or the Human Capital Department's advice prior to traveling. Any employee who is concerned about his/her ability or safety to undertake travel or visits must seek his/her manager's or the HR Department's advice before traveling.

Employees are strongly encouraged to raise travel concerns, as well as provide any feedback, to Banesco. Such employee concerns and comments can be raised at any time, including before, during, or after the travel.

Visitors in the Workplace

To provide safety and security of employees and the facilities at the Bank, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects confidential information, ensures security of equipment, safeguards employee welfare, and avoids potential distractions and disturbances.

Employees should keep personal visits from family members and friends to a minimum during working time except in emergency circumstances. Former employees wishing to visit in work areas must obtain management permission.

If an unauthorized individual is observed on the Bank's premises (a person not known to be an employee), employees should immediately notify their supervisor or direct the individual to the main entrance.

Clean Desk

An effective clean desk effort involving the participation and support of all employees can greatly protect paper documents that contain sensitive information about our clients, customers and vendors. All employees and entities working on behalf of Banesco USA are subject to this policy.

The main reasons for a clean desk policy are:

- A clean desk can produce a positive image when our customers visit the company.
- It reduces the threat of a security incident, as confidential information will be locked away when unattended.
- Sensitive documents left in the open can be stolen by a malicious entity.

At known extended periods away from your desk, such as a lunch break, sensitive working papers are expected to be placed in locked drawers. At the end of the working day the employee is expected to tidy his/her desk and to put away all office papers. The Bank provides desks and filing cabinets with locks, for this purpose.

To uphold the Bank's professional image, displays of personal items such as: pictures, calendars, plants, artwork, etc.; must be kept to a minimum and impartial nature. For the branches, desks must be free from personal items. Workspaces and waiting areas must be kept neat and conserve minimal newspapers, magazines, brochures, etc.

Any employee found to have violated this policy may be subject to disciplinary action.

Publicity Statements

For details, please refer to the Banesco Code of Ethics and Conduct.

Operation of Vehicle for Business

All employees authorized to drive Bank-owned, leased vehicles or personal vehicles while conducting Banesco USA business must possess a current, valid driver's license. Motor Vehicle Records check will be conducted to those employees whose job requires use of a vehicle for business purpose upon offering employment and on an annual basis.

A valid driver's license must be in your possession while operating a vehicle off or on Bank property. It is the responsibility of every employee to drive safely and obey all traffic, vehicle safety, and parking laws or regulations. Drivers must always demonstrate safe driving habits.

Bank-owned or leased vehicles may be used only as authorized by Executive Management.

Cellular phone Use While Driving

Employees who drive for business must abide by all state or local laws prohibiting or limiting cellular phone use while driving. Further, even if usage is permitted, employees may choose to refrain from using any cellular phone while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the cellular phone.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is necessary while the employee is driving, and permitted by law, the employee must use a hands-free option and advise the caller that he/she is unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a cellular phone while driving, employees who are charged with traffic violations resulting from the use of their cellular phones while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

Telecommuting and Remote Work Program

Banesco USA defines formal telecommuting and remote work program as a work arrangement that allows employees to work outside their normal physical place of work (primary office, branches, or department location) on an agreed upon predefined predictable work schedule. By its nature, work performed away from the main office setting must lend itself to effective performance away from the main office. Telecommuting and remote work are alternatives that may be appropriate for some employees and job functions, but not for others. Telecommuting is not an entitlement, it is not a companywide benefit, and it in no way changes the terms and conditions of employment with Banesco USA.

Telecommuting and remote work arrangements will be limited 2 days working remotely and 3 days working on-site on a weekly basis. The days working remotely will be designated by the Bank and must remain consistent every week. Banesco USA doesn't permit 100% remote work under any normal circumstances. Any telecommuting arrangement may be discontinued at will and at any time at the request of the organization.

The purpose of this policy is to clearly define expectations to ensure that both employees and Banesco USA will benefit from this remote work arrangement. Ultimately, the goal is to minimize risk and ensure business continuity so telecommuting or remote employees are productive and successful while working from home.

Definitions

Supervisor – As used in this policy, the term is understood to refer interchangeably with supervisor, manager, Executive Manager or other person formally designated such supervisory responsibility.

Remote Work – Working from home for eligible employees during the regular workweek.

Telecommuting – Working from home for part of an employee's regular work week.

Telecommuting and remote work can be informal, such as working from home for a short-term project or on the road during business travel, or a formal, set schedule of working away from the office as described below. Every effort will be made to provide 30 days' notice of such change to accommodate commuting, childcare and other issues that may arise from the termination of a telecommuting or remote work arrangement. There may be instances, however, when no notice is possible.

Eligibility

Eligible employees can work from home only if their job duties permit it, with the approval of their supervisor and the Human Capital department consistent with the guidelines of this Policy, and/or as mandated by the organization.

Employees who are on short-term/long-term disability or are new parents must adhere to FMLA policy. Please note, any employees requesting a telecommuting or remote schedule due to health or medical related reasons should contact the Human Capital department.

Formal Telecommuting and Remote Work Arrangements

Banesco USA's telecommuting and remote work policy outlines our guidelines for employees who work from a location other than our offices, either on a permanent or temporary basis. The following are the guidelines established:

- Telecommuting and remote work schedule must be coordinated and agreed upon with supervisor prior to starting such arrangement. Telecommuters and remote workers should adhere to the

standard working hours and schedule of the bank. “Trades” of telecommuting shifts, days, and times between employees are not allowed without written supervisory consent.

- Telecommuting and remote work are not designed to be a replacement for appropriate child or other dependent care. Although an individual employee's schedule may be modified to accommodate child and dependent care needs with prior approval, the focus of the arrangement must remain on job performance and meeting business demands without distractions or creating an unprofessional work atmosphere.
- Telecommuting and remote working non-exempt employees will be required to accurately record all hours worked using Banesco USA's HRIS system. Hours worked in excess of those specified in the employee's schedule (per day and per work week) in accordance with state and federal requirements, will require the advance approval of the supervisor and are subject to all overtime requirements. Failure to comply with this requirement may result in the immediate termination of the telecommuting and remote work agreement.
- Telecommuting and remote working employees must follow Banesco USA's meal period, or recordkeeping policies.
- Employees entering into a telecommuting or remote work agreement may be required to forfeit exclusive use of their onsite workstation in favor of a shared arrangement to maximize Banesco USA's space needs.
- The employee must establish an appropriate environment within their home for work purposes. Unless applicable law provides otherwise, Banesco USA will not be responsible for costs associated with initial setup or continuing costs of the employee's home office such as remodeling, furniture or lighting, utilities, telecommunications and data installation, nor for repairs or modifications to the home office space.
- **Protection of any Confidential Information or Banesco USA proprietary information** – Consistent with expectations of information asset security for employees working at Banesco USA locations, telecommuting and remote working employees will be expected to ensure the protection of proprietary company information accessible from their home office. Security steps include, but are not limited to:
 - Use of locked file cabinets and desks;
 - Regular password maintenance;
 - Any other steps appropriate for the job and the environment.

Institutional documentation, including documentation that may be deemed as official work records, may not be removed from the workplace. Employees are expected to check with their supervisor on the nature and identity of such records. With supervisor approval, copies may be made of such records if deemed necessary in the performance of the employee's assigned tasks.

- Injuries sustained by the employee while at their home office location and in conjunction with their regular work duties are normally covered by Banesco USA's workers' compensation policy. Telecommuting and remote working employees are responsible for immediately notifying their supervisor and Human Capital of such work-related injuries in accordance with institutional workers' compensation procedures. Unless applicable law provides otherwise, Banesco USA is not

liable for any injuries sustained by visitors to the employee's work site and is not responsible for injury to others at their telecommuting or remote work location.

- Unless applicable law provides otherwise, the employee will be responsible for determining tax, licensing and other legal implications for the business use of the employee's home based on IRS and community (homeowner's association), local, state and federal government requirements and restrictions. Responsibility for complying with and fulfilling all obligations in these areas' rests solely with the employee.
- Unless applicable law provides otherwise, all necessary insurance protections, disclosures, coverage requirements and costs attributable to the telecommuting or remote work arrangement are the sole responsibility of the employee.
- Employees must abide by all Banesco USA Policies and Procedures. All exceptions to the Telecommuting and Remote Work Agreement and the associated policy and procedure must be requested in writing by the responsible manager and approved in writing by the Human Capital Department.
- Employee and supervisor should read and discuss this policy and the related agreement with special attention to the factors below.
 - The employee must agree to remain accessible and respond timely to communications and needs from other management, staff, and collaborators or supported groups. The employee must, within a reasonable time during the agreed upon work schedule, be accessible by phone, video, online chat, email or any other method agreed upon at the onset of the telecommuting or remote work agreement.
 - An appropriate level of communication between the telecommuter or remote worker and supervisor will be agreed to as part of the discussion. The supervisor and telecommuter or remote worker will communicate at a level consistent with employees working at the office or in a manner and frequency that seems appropriate for the job and the individuals involved.
 - Employees who telecommute or work remotely may be required to report to a prespecified Office or Branch from time to time as part of their regular job to perform duties, receive training or participate in meetings. Notice of the need to report to these locations should be provided as early as practical to allow for the employee to make appropriate plans and arrangements.

Standards of Equipment:

- Banesco USA will supply the employee with reasonable and appropriate office equipment (laptop, softphone, and headset) for successful completion of job responsibilities as requested.
- New Hire employees whose position is eligible for telecommuting will receive an equipment allowance to purchase any additional items needed for successful completion while working remotely.
- Equipment supplied by Banesco USA will be maintained by the institution and is to be used for business purposes only. The employee will neither make personal use of nor allow others personal

use of said equipment. Unless applicable law provides otherwise, the employee accepts financial responsibility for any equipment that is lost, stolen or damaged because of gross negligence, or a willful or dishonest act.

- The telecommuter or remote worker may be asked to sign an inventory of all office property and to agree to take appropriate action to protect the items from damage or theft in coordination with the Information Technology department
- Upon termination of employment all company property and records will be returned to Banesco USA unless other arrangements have been made.
- Equipment supplied by the employee, if deemed appropriate by the institution, will be maintained by the employee. Banesco USA accepts no responsibility for damage or repairs to employee-owned equipment.
- Banesco USA reserves the right to make determinations as to appropriate equipment, subject to change at any time.
- The employee must ensure the physical security of the equipment used to access information and resources. This includes protecting information and remote-working equipment from being stolen or accessed by unauthorized persons. This also includes the security of information in paper format including ongoing storage, back-ups, and proper disposal.
- Hardware, software and data destruction of confidential materials must be done under the guidance and supervision of Banesco USA's IT Department.
- Banesco USA related materials must be brought to the nearest office or branch to be disposed of through standard on site process.

Information Security and Information Technologies

- Banesco USA has set Policies and Procedures in place to ensure the security of Banesco USA Networks and Infrastructure. These policies and procedures extend to all Banesco USA owned equipment that may be provided to employees for the purpose of telecommuting and remote work.
- Banesco USA reserves the right to monitor employee's performance and productivity through the use of technology or any other monitoring metric it deems appropriate. These metrics may include, among others:
 - Attendance monitoring,
 - Log in/out monitoring,
 - User login name monitoring,
 - Computer name monitoring
 - Active/idle time monitoring,
 - Email Application monitoring
 - Website URL monitoring

Expectations

Employee expectations within the Employee Handbook and the Code of Ethics and Standard of Conduct continue to apply when telecommuting / remote work and in virtual meetings. It is each employee's responsibility to maintain professional communication and appearance with other employees as outlined in the Employee Handbook.

Workplace Monitoring

Workplace monitoring and investigations may be conducted by the Bank to ensure quality control, employee safety, security, job performance and customer satisfaction. All company-supplied technology and company-related work records belong to the Bank. Banesco USA routinely monitors use of company-supplied technology. Due to the sensitivity of this matter, monitoring and investigations will be conducted in an ethical and respectful manner. Inappropriate or illegal use or communications may be subject to disciplinary action up to and including termination of employment.

In an effort to protect the property and well-being of the Bank and its customers and employees, the Bank reserves the right to inspect packages, cases, purses, etc. and to conduct searches of desks, computer files, credenzas, file cabinets, personal vehicles, and other property on its premises to locate information or other items or in connection with security-related investigations. Employees are expected to cooperate with such investigations as a condition of continued employment, and refusal to do so can result in termination of employment. In furtherance of this objective, you are requested to report all thefts, acts of vandalism, and unauthorized persons in your work area or other areas promptly to your supervisor.

The Bank's computers, furniture, equipment, and supplies are to be used to conduct official business only and are not intended to be used by employee for personal matters or non-business-related purposes. It is understood that all document and data contained in Bank computers or other data storage systems located on Bank premises are the property of the Bank and may not be removed, deleted, or modified without appropriate authority from the department manager level or above. It is also understood that management has the right to access and view all data located in Bank data files, desks, etc. as authorized by an appropriate member of management and that there is no personal privacy expectation with respect to any such information or the contents of Bank property. For detail regarding workplace monitoring please refer to the Acceptable Use Policy.

Corporate Social Responsibility Program

At Banesco USA we are committed to understanding, monitoring and managing our social, environmental and economic impact to enable us to contribute to our local community and furthermore contribute to the United Nations Sustainable Development Goals. This commitment is deeply ingrained in our core values, and we aim to demonstrate these responsibilities through our actions and within our corporate policies. At Banesco USA, we define Corporate Social Responsibility as follows:

- Promoting education in our community including our workforce;
- Conducting business in a socially responsible and ethical manner;
- Protecting the environment;

In alignment with our Code of Ethics, Banesco USA will ensure that all matters of Corporate Social Responsibility are considered and supported in our operations and administrative matters and are consistent with Banesco USA stakeholders' best interests. Banesco USA is committed to being recognized as a leader in the field of Corporate Social Responsibility and recognizes that in doing so, we will add significant value to our communities and for our shareholders.

This Policy is built on the following areas that reflect existing and emerging standards of Corporate Social Responsibility for further detail please refer to the Corporate Social Responsibility Program & Volunteer Policy.

Volunteering

Our employees will serve as ambassadors for the Banesco's value of generosity of spirit, as they commit skills, passion and time as active and engaged employees and citizens. To support and encourage their commitment, Banesco USA has a Volunteer Force – a benefit that provides paid time off for employees to impact their community through service during regularly scheduled work hours. Employees are encouraged but not obligated to perform community service under this policy.

All full-time employees (excludes temporary, intern and part-time employees) may receive reward points via our employee recognition platform for performing volunteer services through company approved eligible non-profit organizations. Prior to participating in any organization's volunteering activities and before each individual effort, employees need to receive approval from Banesco USA Marketing Department. If a volunteer event takes place during regular scheduled work hours, the employee will be paid as a regular workday in addition to earning recognition points with a maximum of 10,000 points annually.

Employee Handbook Acknowledgement and Receipt

The employee handbook is an important document intended to help you become acquainted with Banesco USA. This handbook is intended to provide guidance on general policies and procedures for employment at Banesco USA.

This handbook and the policies and procedures contained herein supersede any and all prior practices, oral or written representations, or statements regarding the terms and conditions of my employment with Banesco USA. By distributing this handbook, the Bank expressly revokes any and all previous policies and procedures that are inconsistent with those contained herein.

I understand that, except for employment at-will status, any and all policies and practices may be changed at any time by Banesco USA, and the Bank reserves the right to change my hours, wages and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies.

Florida Employees

I understand and agree that nothing in the Employee Handbook creates or is intended to create; a promise or representation of continued employment and that employment at Banesco USA is employment at-will, which may be terminated at the will of either Banesco USA or myself. Furthermore, I acknowledge that this handbook is neither a contract of employment or legal document.

Puerto Rico Employees

I understand that in Puerto Rico, (“Act No. 80”) there is no employment at-will; this requires employers to have a “just cause” for employment termination. New employees who are terminated within the established initial 90-day employment probationary period are not subject to the “just cause” requirement of Act No. 80, provided that the requirements of provided that the requirements of a successful completion of the introductory period have been met.

I have received the employee handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revision made to it.

Electronic acknowledgement is recorded in Banesco USA’s HRIS system.

Acknowledgement of Anti-Harassment and Non-Discrimination Policies

This is to acknowledge that I have received a copy of the Bank's anti-harassment and non-discrimination policies which are found in the Employee Handbook.

I understand that it is my responsibility to fully comply with these policies. I further understand that I should consult the Human Capital Department regarding any questions raised by these policies and not answered by the Employee Handbook.

Electronic acknowledgement is recorded in Banesco USA's HRIS system.