



BANK SECRECY ACT, USA PATRIOT ACT AND ANTI-MONEY LAUNDERING COMPLIANCE POLICY STATEMENT

It is the policy of Intercam Banco Internacional, Inc., (the "Intercam"), and its Board of Directors to comply with the provisions of the *Bank Secrecy Act* ("BSA"), *USA PATRIOT Act* and the requirements to fulfill obligations necessary to join in the international efforts to combat money laundering.

The fight against the laundering of money deriving from criminal activities is priority within Intercam, and any income or source of business cannot be justified if there is a risk of helping those who intend to use our services for those purposes. Also, Intercam is committed to maintain, establish and implement strong and effective procedures to comply with said requirements and obligations. Intercam's management and its employees have been and periodically will be made aware of their potential criminal and civil liability and of the possible consequences of any failure to comply with the BSA/AML & OFAC Policy/Program, as established by laws and regulations by U.S., the local government of Puerto Rico and regulatory authorities. Therefore, as a matter of policy, Intercam has appointed a BSA/AML & OFAC Officer to partner with management in the development and implementation of institution-wide efforts to comply with the above stated legal and regulatory framework.

The BSA/AML & OFAC Officer, in direct coordination with the external auditors, will monitor for compliance with legal and regulatory requirements.

All Intercam employees, whenever they are located, will be informed of this Policy Statement, and attention will be given to establishing standard procedures and to training all employees in applicable matters covered by the Bank Secrecy Act (BSA).

Furthermore, all personnel is to be informed that violations to this policy along with procedures and processes developed to ensure its compliance, shall be treated as a serious offense which may be subject to administrative and/or disciplinary action, including termination.

This policy is adopted to ensure that Intercam will fulfill its legal obligation under the array of amendments to the BSA and to state our strong and firm commitment to support and perform all efforts to combat laundering activities that affect the communities we serve.

The BSA/AML & OFAC Officer will keep the BSA/AML & OFAC Compliance Program updated on an ongoing basis to address changing risks and to contemplate changes in the legislation.

The foregoing constitutes Intercam's Bank Secrecy Act and Anti-Money Laundering Compliance Policy/Program, as amended and approved by the Board of Directors, and reflected in the minutes.