

CODE OF ETHICS CREDIFE DESARROLLO EMPRESARIAL S.A.

PRELIMINARY CONSIDERATIONS

This Code of Ethics reflects the values and ethical principles and behavioral management that CREDIFE DESARROLLO MICROEMPRESARIAL S.A. considers that should regulate in relation to the treatment that CREDIFE faces: customers, employees, shareholders, suppliers of products and services, with other institutions of the financial system and society in general.

This document intends to support healthy practices, banking practice, constitutional and legislative guidelines, and the guidelines established by the different agencies. It also seeks to preserve the legal principles on confidentiality, ethical and professional information management and documentation of exclusive use and management of the institution as well as the as provided in Manuals, Regulations and Policies, Procedures, Prevention of Assets Laundering , Financing of Terrorism and Other Crimes Manual, that govern all Pichincha Financial Group and CREDIFE Working Regulations.

Compliance with the standards established in this Code, ensure that the relationships, behaviors, acts and contracts continue in compliance with ethical, moral and legal principles that have characterized CREDIFE since its establishment and during its institutional life.

1. INTRODUCTION

CREDIFE is an institution that exclusively manages the portfolio of the microenterprise segment of Banco Pichincha C.A. from promotion, marketing, placement until recovery.

Its mission is "To meet the low-income population and small businesses with adequate financial services and products, in a timely and sustainable manner that will enable them to improve their living conditions."

Its vision is "To be the leading organization in the supply of products and comprehensive financial services contributing to the development of responsible microfinance in Ecuador".

Corporate values represent those essential principles that commit members to guide the behavior of the Organization.

2. CORPORATIVE VALUES

Corporate values that adhere to the current Code of Ethics

Integrity

Act within the strictest ethical and social principles clearly, consistent and timely.

Teamwork

Act encouraging and recognizing the contribution of individuals to achieve common goals.

Service

Act with kindness, joy, timeliness, quality and efficiency evaluating our internal and external customers, who are our reason for being.

Excellence

Improve ourselves continuously and optimize resource management to create value.

Responsibility

Act with principles, effectively and efficiently, taking the consequences of our actions.

Innovation

Commitment to continuous self-improvement encouraging creativity and global development

Leadership

Enhance the necessary capabilities to achieve individual, group and organizational objectives.

VALUES OF PICHINCHA GROUP**Equal Treatment, Non-Discrimination and Tolerance**

The dignity of persons will be recognized respecting the identities, differences, freedom and privacy so any act as follows, is forbidden: harassment and discrimination based on race and ethnicity, creed, sex, age, disabilities, sexual orientation, nationality or any other political, ideological, social and philosophical reason.

Verbal harassment (derogatory comments, jokes, slurs or threats among others), physical one (unnecessary or offensive contact), visual one (Dissemination of images, gestures or degrading or offensive messages) or sexual one (advances or requirements) inside or outside the Institution are prohibited.

Respect

Coworkers, customers, suppliers and community in general will be respected and considered, rejecting any kind of offensive attitude that causes a conflict on a personal level. All acts of violence within the entity are prohibited.

Their right to nature will be respected, a healthy environment will be preserved and natural resources in a rational and sustainable manner will be used.

It is not allowed to work under the influence of alcohol or under the influence of narcotics or psychotropic substances, or smoke within the premises of the Institution. It is also not allowed to ingest or use these substances during working hours.

Additionally CREDIFE adheres to the principles contained in the Universal Declaration of Human Rights.

3. COMPLIANCE AND ENFORCEMENT OF THE CURRENT LEGISLATION

All activities of the Institution will be conducted with strict adherence to:

The Constitution of the Republic of Ecuador, Organic, Monetary and Financial Code, Law on Prevention, Detection and Eradication of Asset Laundering and Financing Felonies and other applicable laws; and regulations issued by the Superintendence of Banks, Superintendence of Companies and the Political Board and Monetary and Financial Regulation, and other current dispositions on fiscal obligations, labor relations, transparency of information; defense of consumer rights and environmental responsibility.

4. OBJECTIVE AND SCOPE

The principles, duties and prohibitions set forth in this Code of Ethics of CREDIFE, are focused on strengthening the values and ethical principles that consolidate relations with shareholders, board members, customers, officials, and employees, suppliers of goods or services and society in general.

5. ENFORCEABILITY

The application of this Code of Ethics is mandatory for all who are part of CREDIFE.

6. PERSONAL COMMITMENT

All who are part of CREDIFE assume personal responsibility to know and promote compliance with the principles, mission and values contained in this Code, the same that will be a benchmark for institutional strengthening.

7. PREVENTION OF ASSETS LAUNDERING AND FINANCING FELONIES

All who are part of CREDIFE will take precedence over achieving business goals, the compliance of the ethical principles, ensuring the application of the designed rules for the prevention, detection and control of Banco Pichincha products and services offered to CREDIFE so that they are not used in illicit activities.

Prevention and early detection of unusual transactions will be in compliance with current local and international regulations on the Prevention of Assets Laundering and the provisions contained in the Prevention of Assets Laundering Policy Manual and related policies "know your shareholder", "know your customer", "know your employee", "know your correspondent" and "know your market" that apply to Banco Pichincha and CREDIFE.

8. RELATIONSHIPS OUTSIDE THE ORGANIZATION

Relationship with customers:

It is based on the following guidelines: quality of service, good faith, mutual trust, transparency, security, healthy criticism and adherence to established procedures looking for customer loyalty with the Bank through CREDIFE.

Service protocols established by Banco Pichincha through CREDIFE, which prevail agility, efficiency and cordiality will be applied.

It is prohibited from offering goods or services unauthorized by the Institution; and, its officers or employees shall not give advice to business competitors and unauthorized by CREDIFE.

Physical and moral integrity of customers are respected, avoiding behaviors that involve physical or verbal violence, sexual harassment, coercion, abuse, humiliation, etc. It does not discriminate against customers on grounds of sex, age, ethnicity or religion, political preference or sexual orientation.

In terms of collection, CREDIFE adheres to the Recovery Policy of Banco Pichincha and to those established by the existing regulations for the purpose; however, the minimum standards that must be strictly respected by the collaborator otherwise be considered a serious offense that involves his/her removal from the institution, are highlighted:

- Using abusive and offensive language against the customer.
- Use of physical force against the customer.
- Shout to customers
- Enter the customers' house without being invited.

- Humiliate to the customer
- Violate the right of privacy of the customer

Transparency

Customers will receive the requested information in a full, clear and appropriate manner looking for the most effective communication of data and information. The provided information will be complete and accurate to the financial users about products, services and costs of Banco Pichincha offered by CREDIFE.

Customers are informed about their right to complain and the existing channels to make suggestions, inquiries and complaints. In addition the customer will be given all the requested personal information.

Confidentiality of Information

Information about active, passive and contingent of customers, depending on secrecy or bank confidentiality established in current regulations and not used for personal or third party benefit, shall be shielded. The directors, officers and employees shall refrain from disclosing confidential information from the various stakeholders. The institution may only disseminate reliable accounting and financial information.

Staff is kept up to date and trained about safety procedures and communicating data and information to customers on strict mechanisms applied to protect the security of customer data.

9. CONFLICT OF INTERESTS

Transparency in relations

Those who are part of CREDIFE will not receive, request or require from customers, coworkers, suppliers or anyone else: money, loans, guarantees, economic aid, gifts, grants, hospitality or benefits for services that the organization provides.

They will not act improperly for personal benefits in the fulfillment of their duties, or engage in any transaction in which a shareholder, officer, director or administrator, or their spouse or partner and relatives within the second degree of consanguinity or affinity, have an interest of any nature.

They cannot give any customer, supplier or any other person any kind of benefits that go against the limitations and conditions set by the Bank's and CREDIFE policies, statutes and regulations.

They, as part of CREDIFE, shall communicate to their superiors any attempt to pressure, bribe or act of corruption that may compromise the performance of their duties. CREDIFE should not conduct business of any kind with people who deviate from the ethical and legal standards.

Only the Business Manager of CREDIFE or the Board may authorize an employee receiving awards, honors or decorations awarded to the institution by third parties.

Supplier Relationship.- A variety of circumstances that may create a CONFLICT OF INTEREST will be avoided, as such any situation in which those who are part of CREDIFE have private or personal interests that benefit themselves or any natural or legal person to be avoided which maintains a direct relationship, distorting the required impartiality and objectivity in the performance of their duties.

In CONFLICTS OF INTEREST POLICY that Banco Pichincha manages and to which CREDIFE adheres, parameters and guidelines designed to resolve such situations are detailed. In addition to the mentioned in this document, the Division of Human Resources - DHR will require to employees in key positions that manage financial resources, an annual writing responsibility statement related to their business or financial links in the "Statement of Assets" form.

Transparency in the selection of suppliers.- All bidding, contracting, procurement processes, etc. should be handled exclusively through official channels and under no circumstances may be verbal contracts and are limited exclusively to the parameters set by CREDIFE forcing themselves to maintain absolute confidentiality.

The selection of suppliers and contracting procedure shall be subject to the Procurement, Payments, Supplier Qualification and Contract Administration Policy and other applicable to the subject set by Banco Pichincha, to which CREDIFE adheres.

10. RELATIONS WITH SOCIETY IN GENERAL AND PUBLIC OPINION

Independence.- As part of CREDIFE they will act observing the organizational structure of CREDIFE and the procedures established in its regulations, policies, manuals, etc. governing both CREDIFE and Banco Pichincha, keeping independence regarding their decisions against the instructions external bodies, outside the institution.

They may not act as consultants, agents, brokers, intermediaries, attorneys, lawyers, litigants or others, in transactions, contracts or transactions related to CREDIFE or the Bank.

Political Affiliation.- Political Independence can be maintained without involving CREDIFE in proselytizing activities and electoral politics.

Activities outside the Institution.- Paid or unpaid activities will be run, either in the cultural, scientific, educational, sporting, charitable, religious, social work sphere, or other volunteer activities provided they do not hinder or interfere with the fulfillment of obligations and work schedules in the institution, or involving CREDIFE. All of this, subject to the law and to the extent permitted by it.

Public and Judicial Testimonies.- To present public testimony or voluntary statements and / or contribute to causes, judicial inquiries or investigations undertaken by control bodies from the State, CREDIFE employees will request permission to the General Manager, provided that CREDIFE is involved.

If an employee receives a subpoena or Administrative Judicial Authority to give evidence or testify in a case CREDIFE may face and one of the former colleagues or customers will not require any written authorization from the Institution to manage it.

Reviews and Publics Declarations.- Articles cannot be written or statements cannot be made to the press and other publications when they can be interpreted as a manifestation of the CREDIFE's position on any issue, unless there is an explicit authorization for that of the President or the General Manager.

Relationship with Competence.- No comments can be made that may affect the image or contribute to spreading rumors about competitors of CREDIFE or Banco Pichincha with whom rather be maintained cordial and respectful relationships.

No strategies may disclose confidential information or strategies of CREDIFE or Banco Pichincha that compromise the business strategy. Spying and obtaining confidential information from competitors by illegal methods are prohibited.

Relationship with regulatory bodies.- Contacts with representatives or officials of external control bodies, must always be framed and aligned with the institutional position, in the absence of this, the opinions expressed by the members of the institution will be of a personal nature and cannot be compromising the image and prestige of CREDIFE or its interests.

Handling of Privileged Information.- Those who would have access to privileged information, especially those who is managed by committees and Boards of Directors may not be used it in personal or third party benefit.

Responsible Marketing Practices.- Advertising should be clear, accurate, timely, reasonable, adequate, validated, truthful and complete, related to the products and services offered by Banco Pichincha through CREDIFE in accordance with principles of fair competition and good business practice, prepared with a due sense of social responsibility and based on the principle of good faith. It must also be free of elements that could lead to misinterpretation of the characteristics of the products and services offered by the Institution.

In communication, advertising, promotions and general information will not be allowed to issue messages that are offensive, harmful, violent or discriminatory. Initial conditions and terms of offers on the sweepstakes and promotions for customers will be respected.

ACCOUNTABILITY

CREDIFE shall report on the fulfillment of the objectives, responsibilities and actions carried out within the organization explaining the results to society and stakeholders. Management reports should be framed within the legal and ethical framework.

RELATIONSHIPS INSIDE THE ORGANIZATION

Internal Relationships.- The Organization shall promote teamwork and provide the necessary information for the normal development of activities.

Relationships of respect, collaboration and solidarity without prejudice of origin, race, sex, color, age and any other forms of discrimination will remain. If an employee knows or is suffer from any kind of discrimination, should communicate the fact through the Human Resources Consultant assigned to his/her area, the complaint shall be treated with absolute confidentiality.

The reputation of all without allowing false prejudices, testimonies, unfounded information will be a concern.

In the event of irregularities, reviews, recommendations or suggestions of any order shall be informed through appropriate channels.

Relationships with subordinates and use of power.- The supervisory lines should be provided in an oral and written manner and have to be clear, consistent, with impartial instructions, which do not conflict with physical or psychological integrity of the employees. They not are entitled to seek enforcement of activities unrelated to the workplace or that are clear signs of abuse of power.

They will not make use of the position, function and activity or influence in order to obtain personal favors from subordinates or third parties.

The established methodology shall be applied to performance evaluations and self-evaluations, acting with objectivity and transparency. If the supervisor delegates functions he/she will not shirk his/her own responsibility.

Relations with supervision lines.- Employees must follow the instructions in the times and forms established in an oral or written manner; they will show willingness to dialogue and the necessary openness to resolve conflicts which may arise, the employee will keep respect to his/her line of supervision.

He/she must know and comply with the provisions of the Internal Working Regulation.

The coworker will avoid acting as an intermediary between its line of monitoring and other members of his team, except if these are the functions for which he/she was hired.

Optimal use of goods and resources.- The proper use and conservation of goods, resources, buildings of the institution will be respected and ensured and the private or special use of these will be prevented, unless there is express authorization hereby .

Any situation or incident that may result in loss, damage, misuse, theft, embezzlement or destruction of property and resources will be provided immediately to higher or managerial level.

Efforts will be made to minimize environmental impacts avoiding waste of nonrenewable natural resources.

The misuse of technology resources of the institution should be avoided; forcing to care for and protect assets, software, information and tools, tangible and intangible. Download of programs or illegal or unlicensed systems in computers are prohibited.

It is prohibited individual and private use of intellectual property of CREDIFE in all its forms.

Each partner will take special care in the use and management of keys, codes and security elements assigned to each one. It is expressly forbidden to provide third parties with personal passwords.

COMMITMENT WITH THE CREDIFE'S STAFF

Professional Development.- CREDIFE will promote the development of its employees by encouraging the improvement of their own abilities and skills.

Policies and actions relating to recruitment, hiring, training and promotion of employees will be based on professional criteria of ability, competence and merit.

Employees will be trained and informed of the policies and processes of evaluation of their work and participate in management and feedback processes.

Supervision lines will be responsible for the development, growth, motivation of its employees, and shall ensure that the working environment is the most appropriate to achieve, maintain and retain the best employees, relying on management of the Human Resources.

The company will recruit, promote and compensate employees based on their merits.

Retributions

CREDIFE will provide its employees a fair and adequate compensation according to the labor market in which they develop themselves.

Respect for Human Rights.- The Organization will host the precepts enshrined in the Universal Declaration of Human Rights and respect the individual rights of employees in relation to the collective welfare, without giving way to any kind of discrimination inside and outside the Institution.

Any form of child labor or forced labor is eradicated, rejecting any form of threat, coercion, abuse, violence or intimidation in the workplace. The rights of employees are respected, in accordance with the law.

Work Environment

CREDIFE will establish preventive mechanisms to prevent accidents, injuries and illnesses that are associated with professional activity through strict compliance with the applicable regulations on occupational hazards and occupational health.

The organization shall ensure that personal, medical and benefits information will be confidentially restricted to own partner, along the lines of direct supervision and to the responsible personnel for its custody and control.

Activities may be suspended in situations where life and / or physical integrity own and / or work colleagues are at serious and imminent danger.

IMPLEMENTATION, COMPLIANCE, DISSEMINATION AND UPDATE OF THE CODE OF ETHICS

Subject to the Code.- This Code of Ethics will be acknowledged and in observance of shareholders, directors, officers and employees of CREDIFE.

All employees must have a copy of the Code of Ethics and commit to implement it.

All new employees of CREDIFE must sign a "personal commitment to the Code of Ethics".

Compliance of the Code.- CREDIFE officials who have supervisory level shall exercise reasonable control over their collaborators and promote compliance with this document; likewise, warn of the consequences of non-compliance.

Breach and violation of the rules detailed in this Code of Ethics shall be punished in accordance with the provisions of the Labor Code and the Internal Working Regulations without prejudice to the responsibilities of administrative, civil or criminal order that apply.

CREDIFE reserves the right to impose penalties according to the level of gravity thereof.

Executable sanctions may be, but are not limited to:

1. Call of verbal attention
2. Call of written attention
3. Suspension of employment.

Broadcasting and upgrade.-

The Human Resources Division will be responsible for distributing and disseminating this document to all members of CREDIFE using the means it considers necessary to comply with this.

Updating this Code of Ethics will be made in the light of the specific needs of the institution and when laws, regulations, resolutions of the inspection bodies require it.

Whatever is not regulated in this Code of Ethics will be governed by the provisions of the Labor Code, the Internal Working Regulation, Organic, Monetary and Financial Code, Resolutions of the Superintendence of Banks and the Political Board and Monetary and Financial Regulation, Law on Prevention, Detection and Eradication of Asset Laundering and Financing Felonies and Resolutions that thereon will issue the Financial Analysis Unit, Guidelines and resolutions of the Board of CREDIFE, Policies and Manuals of Banco Pichincha C.A. to which CREDIFE adheres.