

Code: DOC-SISGAS - PE-07	MINISTRY OF ECONOMIC AND PRODUCTIVE DEVELOPMENT	 GOBIERNO DEL ECUADOR Ministerio de Desarrollo Económico y Productivo
Version: 5.0		
Effective date: 07-09- 2026	ANTI-BRIBERY MANAGEMENT SYSTEM	
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ANTI-BRIBERY POLICY

ISSUE CONTROL		
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APPROVED BY:	SARIHA BELÉN MOYA ANGULO	MINISTER OF ECONOMIC AND PRODUCTIVE DEVELOPMENT

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1. OBJECTIVE

This Anti-Bribery Policy reflects the Ministry of Economic and Productive Development (MDEP)'s ongoing commitment to integrity, transparency, and compliance with the current legal framework, guiding its actions toward the prevention, detection, and sanctioning of bribery at all organizational levels.

For the development of this Anti-Bribery Policy and the MDEP Anti-Bribery Management System (SISGAS), the requirements established by the National Public Integrity Policy, ISO 37001, and the applicable laws and regulations on ethics, transparency, and the fight against corruption have been taken into consideration. Compliance with these requirements is mandatory. The MDEP commits to complying with all applicable requirements.

The SISGAS establishes policies, guidelines, and controls that guide institutional management toward ethical and transparent practices. Within this framework, anti-bribery objectives are established in alignment with this Policy and implemented through actions, assigned responsibilities, and indicators defined in the SISGAS management instruments. Its implementation covers both the processes directly included within the SISGAS Scope and the cross-cutting mechanisms established under the System.

The MDEP prohibits all forms of bribery and has implemented the SISGAS, based on ISO 37001, with the purpose of strengthening the culture of institutional integrity and ensuring the trust of citizens and interested parties¹.

2. SCOPE OF APPLICATION

The scope of this Anti-Bribery Policy covers all public servants and officials of the Ministry of Economic and Productive Development. Its application within the framework of the SISGAS is governed by the Scope defined for the System.

This Policy is available to interested parties, is communicated at all levels within the Ministry of Economic and Productive Development, and to business associates² that pose more than a low bribery risk, as applicable.

¹ According to the definition in ISO 37001: a person or organization that can affect, be affected by, or perceive itself as affected by a decision or activity

² According to the definition in ISO 37001: an external party with which the organization has, or plans to establish, some type of business relationship.

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The Anti-Bribery Management System (SISGAS) is subject to periodic monitoring, review, and evaluation to verify its proper implementation, maintenance, and continual improvement, as well as the effectiveness of the anti-bribery objectives.

3. RISK MANAGEMENT AND ANTI-BRIBERY FUNCTION

The Ministry of Economic and Productive Development (MDEP) periodically identifies, assesses, and manages bribery risks associated with the processes included within the Scope of the Anti-Bribery Management System (SISGAS).

The results of these assessments are documented in risk matrices, which establish treatment plans and specific controls for prioritized risks, with the purpose of preventing, reducing, and controlling their likelihood of occurrence, as well as ensuring appropriate follow-up and continuous monitoring.

As part of the internal and external evaluation mechanisms, the MDEP commits to implementing preventive, corrective, and improvement actions aimed at strengthening the effectiveness, efficiency, and continual improvement of the SISGAS, in compliance with the principles of transparency, integrity, and institutional accountability.

The Coordination of Compliance and Control is the unit responsible for exercising the Anti-Bribery Function and overseeing the implementation, maintenance, and continual improvement of the SISGAS.

This Coordination has the authority, autonomy, independence, and technical competencies necessary to exercise the Anti-Bribery Function and reports directly to the highest authority of the Ministry of Economic and Productive Development, thereby promoting impartiality and objectivity in the exercise of the Anti-Bribery Function.

4. CODE OF ETHICS AND NON-COMPLIANCE

The MDEP has an institutional Code of Ethics approved by the highest authority. This document is mandatory for all public servants and employees of the institution, who are informed of its content and application upon joining the institution.

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The Code of Ethics applies across all administrative units of the MDEP, promoting the principles of integrity, transparency, responsibility, and commitment to public service, in accordance with the applicable regulatory framework on public integrity.

Conduct contrary to this Anti-Bribery Policy, the Code of Ethics, or any other documented requirement of the SISGAS will be sanctioned in accordance with the current legal and disciplinary framework, by the competent authorities and with due process.

5. REPORTING CHANNEL

In accordance with Article 83 of the Constitution of the Republic of Ecuador and Article 22 of the Organic Law of Public Service, every public servant or official of the Ministry of Economic and Productive Development (MDEP), as well as any person acting by virtue of a state authority or on behalf of the institution, has the obligation, ethical duty, and institutional responsibility to report any fact, conduct, or information that could indicate or give rise to a presumption of a violation of this Anti-Bribery Policy, the Anti-Bribery Management System (SISGAS), or the applicable regulations on integrity and transparency.

For this purpose, the MDEP provides the following formal reporting mechanism:

REPORTING CHANNEL: accessible at:

<https://www.economicproductivo.gob.ec/denuncia-aqui-la-corrupcion/>

The MDEP encourages and positively values the responsible reporting of any indication or suspicion of bribery or misconduct, whether by public servants or other interested parties. In this regard, the institution has established secure and confidential mechanisms for receiving, analyzing, and handling reports, guaranteeing:

- The confidentiality of the identity of the whistleblower or informant;
- Protection against retaliation, in accordance with applicable laws, regulations, and procedures;
- Acting in good faith as a guiding principle in the use of the channel; and
- Timely handling of reports within the MDEP's area of competence.

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6. CONSULTATION CHANNEL

Similarly, the MDEP has a consultation channel through which inquiries regarding the Anti-Bribery Management System may be submitted via the following email address

CONSULTATION CHANNEL: consultasSISGAS@economicoproductivo.gob.ec.

The Ministry of Economic and Productive Development is committed, within the scope of its competences, to promoting a culture of institutional integrity and transparency, which are fundamental pillars of the Anti-Bribery Management System.



Sariha Belén Moya Angulo

MINISTER OF ECONOMIC AND PRODUCTIVE DEVELOPMENT

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CHANGE CONTROL		
Revision	Date	Descripción de la Modificación
0.0	17-04-2019	Initial Issue
0.1	18-06-2019	Change to the document structure
1.0	28-06-2019	Document approval
1.1	23-12-2019	Inclusion of the express prohibition of bribery (page 2, INTRODUCTION, second paragraph)
2.0	27-12-2019	Document approval
2.1	09-02-2024	Adjustment to: • Incorporate the Compliance and Control Directorate. • Incorporate the SISGAS consultation channel. • Improve general aspects.
3.0	16-04-2024	Document approval
3.1	14-10-2025	• Clarifications regarding Scope and Scope of Application. • Adjustments for technical precision and wording. • Removal of the letters "TR" from the document code, in alignment with the SISGAS Scope. • Removal of the term "Resource Transfer" from the title.
3.2	07-01-2026	Adjustment based on CGAJ review.
3.3	28-01-2026	• Adjustments requested during the review workshop with members of the SISGAS Committee and the Director of Compliance and Control. • In accordance with the Auditor's observation, the ISO Standard is specified without including its version; if the standard is updated, the change is recorded in the Change Control section. • In accordance with the Auditor's observation, the service channels available through the SISGAS are specified.
3.4	04-03-2026	Technical adjustments requested by the Anti-Corruption Committee.
4.0	06-03-2026	Document approval
4.1	28-08-2026	Update of the Anti-Bribery Policy to align it with the new institutional name, the institutional integration process, and the requirements of ISO 37001:2025, including adjustments regarding applicable requirements, the Anti-Bribery Function, communication to interested parties, and protection against retaliation.
5.0	07-09-2026	Document approval

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