BLADEX, INC.

RISK POLICY AND ASSESSMENT COMMITTEE (CPER)
CHARTER

I. Purpose

The Risk Policy and Assessment Committee (the "Committee") of Bladex, Inc. (the "Bank") is a standing committee of the Board of Directors. The Committee is charged with reviewing and recommending to the Board of Directors for approval, policies related to a prudential Enterprise Risk Management. The Committee shall review and assess the Bank's exposure, within the risk levels the Bank is willing to assume pursuant to such policies, to the various risks inherent in its business activities, including the quality and profile of credit assets; country risk exposure; market and liquidity risks; technology and information security risks (including cybersecurity); operational risks, which include the legal risks associated with the Bank's products; model risk; fraud risk; reputational risk; environmental and social risks; climate-related risks; and the management of corporate insurance.

The Committee fulfills its responsibilities through regular reports from Senior Management and through its interaction with the Enterprise Risk Management function and other members of the Bank's Management. In performing its duties, the Committee shall apply criteria of reasonableness and materiality to the scope of its work.

The Committee shall not be responsible for the proper implementation of the policies, nor shall it be responsible for ensuring compliance with legal limits or any other applicable restrictions. Such responsibilities rest with the Enterprise Risk Management function and with the Bank's Management as a whole.

II. Organization

The Committee shall consist of not less than three directors. Subject to this minimum, the exact number of Committee members shall be determined, from time to time, by the Bank's Board of Directors. One of the Directors shall also serve as a member of the Audit Committee. In addition, the Bank's Chief Executive Officer, the Executive Vice President of Enterprise Risk Management, the Executive Vice

President of Business, and the Executive Vice President of Finance shall also be members of the Committee.

The members of the Committee and its Chairman shall be elected and removed by the Board of Directors and shall serve for a term of one year, but may be re-elected indefinitely.

III. Meetings and Resolutions

The Committee shall meet at least five times per year, or more frequently if circumstances so require. Committee meetings shall be convened by its Chair or at the request of two of its members. Such meetings shall be held at the place, date, and time specified in the corresponding notice. The notice of the meeting shall include the agenda. The Committee may also meet by telephone and/or virtual means.

The presence of a majority of the Committee members shall be required to constitute a quorum for the holding of a Committee meeting.

The meetings of the Committee shall be presided over by its Chair, or in the Chair's absence, by an ad-hoc Chair designated at the meeting to act in that capacity.

Pursuant to this Charter, the Bank's Board of Directors has delegated to the Committee sufficient authority and powers to adopt binding resolutions necessary to carry out the duties and responsibilities assigned to the Committee herein. However, the resolutions adopted by the Committee under this delegation of authority and powers may not, at any time, contradict the Bank's Articles of Incorporation or Bylaws, the Committee's Charter, nor any resolutions adopted by the shareholders or by the Bank's Board of Directors. The delegation of authority and powers by the Board under this Charter shall in no way preclude the Board from adopting resolutions on matters that fall within the purview of this Committee.

All resolutions of the Committee shall be adopted by the favorable vote of a majority of its members.

The Committee's discussions and resolutions shall be recorded in Minutes, which shall be signed by its Chair and maintained in a minute book or in electronic form.

IV. Duties and Responsibilities

The Committee shall propose to the Board of Directors, for its consideration and approval, as applicable, the following matters:

a) With respect to Enterprise Risk Management:

- Monitoring of risk exposures and their compliance with established tolerance limits.
- Assessment of Risk Management performance
- General risk assessment policies and methodologies
- Model Risk Management
- Management of the Bank's Corporate Insurance program (D&O, BBB/CC/FIPI, Cyber), including the placement and renewal of such insurance.
- Any other relevant matters.

b) With respect to Credit Risk:

- Policies affecting credit management and credit risk.
- Credit Risk Manual
- Recommendations of internal Credit Risk limits that are more stringent than regulatory limits.
- The levels of delegated credit authority across Management.
- The quality and trends of credit assets.
- Semiannual Independent Credit Review of the New York Agency's commercial portfolio.
- Reports on criticized or vulnerable assets
- The reasonableness and adequacy of credit reserves.
- Any matters that may have a material impact on the portfolio.
- As an exception, the Committee shall address special situations that may occasionally arise in day-to-day credit operations and that require its approval.
- The Committee shall evaluate and approve credit limits and shall approve Management's proposals for the granting of all forms of financing and contingent obligations—including loans, credit lines or facilities, letters of credit, finance leases, factoring, bank deposits, sureties, bank guarantees, and other contingencies, with or without collateral in favor of the Bank—as well as the purchase and sale of loans, financings,

contingencies, and portfolios in the secondary market. Such approvals shall be granted up to the legal limit applicable to the Bank in accordance with the regulations in effect on the date of each approval, whether for a single transaction and/or an economic group. The Committee shall report such approvals to the Board of Directors and shall refer any transaction for the Board's consideration and approval when the amount of such transaction exceeds the authorization limit delegated to the Committee.

c) With respect to Country Risk:

- Policies affecting Country Risk management.
- Country Risk Manual.
- Recommendations regarding ratings, capital and/or nominal limits, specific terms and transaction types relating to Country Risk, subject to subsequent approval by the Board of Directors.
- The level of compliance with existing limits and the approval of exceptions to Country Risk limit policies and capital allocation for specific cases arising in the ordinary course of the Bank's business, with the obligation to report such exceptions to the Board of Directors at its next meeting.

d) With respect to Operational Risk:

- Policies affecting Operational Risk management.
- The Operational Risk Manual.
- Business Continuity Plan.
- Legal Risk Manual.
- Results of Operational Risk Assessments in Processes.
- Trends in Operational Risk management.
- Reports on the database of operational events and incidents.

e) With regard to IT and Information Security Risk:

- Information Security and Cybersecurity Strategic Plan.
- Policies that affect the management of IT and Information Security Risk.
- IT and Information Security Risk Manual.
- Cybersecurity Risk Assessment Results.
- Trends in IT and Information Security Risk management.

f) With respect to Market and Liquidity Risk:

- Market and Liquidity Risk Management Policies

- Market, Liquidity and Balance Sheet Structure Risk Management Manual
- Recommending internal Market Risk limits that are stricter than regulatory limits
- The level of compliance with existing limits
- Trends in exposure to market risks (price, currency, interest rate, and liquidity)
- Any matters that could have a material impact on investment positions and the balance sheet structure

g) With respect to Fraud Risk:

- Fraud Risk Management Policy
- Fraud Risk Management Program
- Establishing the Fraud Risk management methodology
- Recommending mechanisms for monitoring Fraud Risk and the corresponding reporting channels
- Management Indicators

h) With respect Reputational Risk:

- Reputational Risk Management Policy.
- Defining the methodology for managing Reputational Risk (phases for identification, handling and reporting, monitoring and control, and information)
- Recommending mechanisms for monitoring Reputational Risk

i) With respect to Environmental and Social Risk (ESG) and climate-related risks:

- Policies that affect the management of Environmental and Social Risk
- Management Indicators

j) With respect to Model Risk:

- Model Risk Management Policy
- Ensure an adequate governance framework for model risk management, considering the validation process based on the model life-cycle phases.

k) With respect to Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (ML/FT/WMD) Risk:

- ML/FT/WMD Risk Management Assessment Results

l) With respect to Legal Risk[1/]:

- Legal Risk Manual.
- Policy for Documentation and Other Legal Matters.
- Establish a methodology that enables adequate control over the identification, measurement, monitoring, control, and reporting of risk, with the direct support of the Legal Department.
- Prevent the loss of monetary resources through the proper and ongoing identification of Legal Risk.

[1/] Management related to Legal Matters (business legal risk / regulatory and compliance risk) and to Anti–Money Laundering is the responsibility of the Legal Advisory and Compliance areas, respectively.

V. Interaction with Management

The Committee shall meet with the Executive Vice President of Enterprise Risk Management and with such other members of Management as it deems appropriate.

During these meetings, Management shall present to the Committee, through a dashboard, the most relevant developments since the previous meeting. Such information may include, among other matters:

- Evolution of the loan and investment portfolios
- Status of vulnerable or non-performing loans
- Country risk analysis and expectations that may affect the Bank given the specific circumstances of certain countries.
- Trends in operational risk indicators and the operational loss database
- Analysis and review of IT and information security risk management indicators.
- Monitoring of fraud risk indicators.
- Trends in market and liquidity risk management indicators.
- Any other background information deemed appropriate by the Committee and Management.
- Status of compliance with established policies

The Committee shall make recommendations regarding action plans and corrective measures that may be adopted by Management, and shall indicate any

changes or additional measures that it deems appropriate. These recommendations shall be submitted to the Board for review and approval, as appropriate.

VI. Managing Conflicts of Interest

Any transaction that, by its nature, involves the Bank and a shareholder, Director, Officer, or employee of the Bank, or any person in which such shareholder, Director, Officer, or employee serves as a shareholder, director, officer, employee, or agent, or any person with whom any of them has a family relationship (collectively, "Related Persons"), constitutes a potential conflict-of-interest situation. Accordingly, all such transactions, whether related to the approval of limits or credit facilities, interest-bearing bank deposits, management of the Bank's portfolio, or any other business operation considered or approved by the Committee, shall be conducted in the best interest of the Bank, in strict compliance with applicable laws and regulations, and never for the individual benefit of any shareholder, Director, Officer, employee, or their Related Persons.

With respect to decisions made by the Committee regarding transactions in which a conflict of interest may arise, the following procedures shall apply:

- Any Director who has a conflict of interest with respect to a specific transaction shall disclose such conflict to the Committee.
- Any Director who has a conflict of interest with respect to a specific transaction shall refrain from communicating with Management in any manner that could influence it regarding the matter giving rise to the conflict.
- Any Director who has a conflict of interest with respect to a specific transaction shall leave the meeting room to allow the remaining members of the Committee to hold a full and open discussion of the transaction.
- The decision shall be taken by the Committee with the abstention of the Director who has the conflict of interest.
- In the case of the analysis of country-risk limits and country-level capital allocation, the Director who is a national of the country under review may provide his or her professional opinion on the matter but must leave the meeting room prior to the vote.

VII. Compensation

The members of the Committee shall receive such compensation as may be

determined from time to time by the Board of Directors.

VIII. Amendments

This Charter may be amended by the Board of Directors of the Bank whenever it deems it appropriate or necessary, based on the reviews it conducts, which shall occur at least annually.

Last Review: February 10, 2026