



Code: DOC-SISGAS-TR-PE-07	MINISTRY OF ECONOMY AND FINANCE	
Version: 3.0		
Valid from: 16-04-2024	ANTI-BRIBERY MANAGEMENT SYSTEM	
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ANTI-BRIBERY POLICY

ISSUE CONTROL

	NAME	POSITION
APPROVED BY:	Juan Carlos Vega Malo	MINISTER OF ECONOMY AND FINANCE

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1. INTRODUCTION

This **Anti-bribery Policy** reflects that our institution permanently maintains and displays a high commitment to carrying out its activities within the framework of its powers with the highest level of ethics and compliance with current legislation.

*At the Ministry of Economy and Finance, **we prohibit bribery** and are committed to combating bribery by establishing policies and guidelines that guide the behavior of all our workers and public and private third parties who have a contractual or any other relationship with the Ministry of Economy and Finance.*

In this context, the Ministry of Economy and Finance (MEF) has created the necessary norms and organizational structure for the proper implementation and operation of the Anti-bribery Management System, hereinafter **SISGAS**, aimed at preventing, controlling and managing any possible risk of bribery to which the institution is exposed in its internal functioning, and in its relationship with the interested parties.

2. SCOPE OF APPLICATION, REACH, AND OBJECTIVES


This Anti-bribery Policy is applicable to the MEF, in carrying out its "**TRANSFER OF RESOURCES**" service, including all the processes necessary for its operation.

The scope of application extends to all the public servants of the MEF who participate in carrying out the "*Transfer of resources*" service, and to all other public institutions, business partners, public servants, private companies, citizens, national and international organizations, and delegations with which it interacts in the execution of the aforementioned service, i.e. the **interested parties**, in order to prevent acts of bribery.

For the development of this Anti-bribery Policy and of the **SISGAS** of the MEF, we have taken into consideration the requirements established by the **ISO 37001:2016** standard and the current legal framework regarding compliance and prevention of bribery and corruption that apply to our institution in carrying out its activities, of which a strict observance and compliance are demanded.

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Our **SISGAS** is subject to periodic evaluations and reviews and contains detailed and documented '**ANTI-BRIBERY OBJECTIVES**' that are periodically reviewed and available for consultation to those who request them on our website.

“A COMMITMENT FROM ALL”

3. RISK MANAGEMENT AND RESPONSIBLE FOR COMPLIANCE

At the MEF, we periodically identify and assess the bribery risks to which public servants who carry out activities in the "*Transfer of Resources*" service are exposed, documenting the results in the risk map, establishing control plans for the prioritized risks, with the clear objective of preventing and reducing their probability of occurrence, as well as to establish follow-up and control mechanisms.

As a result of both internal and external mechanisms for evaluating the efficacy of our **SISGAS**, we have established measures and **commit to fulfilling them and improving them continuously**, with the aim of creating a truly dynamic system, capable of adapting to changing circumstances due to external factors, to the improvements, opportunities, and shortcomings detected.

For a maximum guarantee of independence, the Compliance and Control Department is available, empowered with the appropriate capacity, independence and authority, so that, reporting directly to the Minister of Economy and Finance, it ensures the correct implementation and improvement of our **SISGAS**.


4. CODE OF ETHICS AND NON-COMPLIANCE

At the MEF, we have a current **Code of Ethics** approved by the Minister of Economy and Finance, which is of mandatory application to all public servants and which is brought to the attention of all employees at the time of joining the institution.

Said Code of Ethics applies to **all MEF employees**, notwithstanding the administrative and legal responsibilities by action or omission, in the performance of their duties. In this sense, we have a **disciplinary regime**, established in the **Internal Code** of the institution, of which all servants are informed, to sanction behavior contrary to the provisions of this Anti-bribery Policy and the Code of Ethics; and the non-compliance of the remaining requirements of the **SISGAS**. The application

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of sanctions will be done in an equitable, proportional manner, without discrimination and respecting due process.

5. CLAIMS CHANNEL

Any servant or official of our institution, acting under a state authority in an authorized manner on behalf of the MEF, has the legal obligation to inform and report any action, behavior, information, or evidence that is susceptible or suspected of violating this **Anti-bribery Policy** or the requirements of the **SISGAS** of our institution. "To this end, in the MEF we have provided the following means for anyone to report a suspicious act or behavior:

CLAIMS CHANNEL accessible on our website (<https://www.finanzas.gob.ec/>); directly accessing the link <https://www.finanzas.gob.ec/denuncia-aqui-la-corrupcion/>; or, through the e-mail address denuncias@finanzas.gob.ec

Likewise, in the MEF, we have established the following channel for anyone to raise any kind of doubt or inquiry regarding this matter:

CONSULTATION CHANNEL via email at ConsultasSISGAS@finanzas.gob.ec


At the MEF, we value positively the communication of any indication or suspicion of acts by a public servant or interested parties, that infringe upon this policy or the Code of Ethics and, in general, any action contrary to the current legal framework; so it is important to establish in greater detail the facts reported or communicated. To this end, safe internal mechanisms and processes have been established to guarantee the **confidentiality** of the complaints and communications received.

The Ministry of Economy and Finance commits itself to take all necessary actions, within its scope of competence, to **avoid** any type of administrative reprisals against the complainant or informant.

Approved by:

Juan Carlos Vega Malo
MINISTER OF ECONOMY AND FINANCE

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Reviewed by:	María Belén Landázuri	Administrative Financial General Coordinator - Anti-Corruption Committee Chair	
Written by:	Ligia Moncada	Director of Compliance and Control, In Charge	

CONTROL DE CAMBIOS

Revisión	Fecha	Descripción de la Modificación
0.0	17-04-2019	Initial emission
0.1	18-06-2019	Document structure change
1.0	28-06-2019	Document approval
1.1	23-01-2019	<ul style="list-style-type: none"> inclusion of the specific prohibition of the bribery (page 2, INTRODUCTION, second paragraph)
2.0	27-12-2019	Document approval
2.1	18-10-2023	Update of the mechanism for appointing the Compliance Function Officer
3.0	29-10-2023	Document approval
2.1	09-02-2024	Adjustment to: <ul style="list-style-type: none"> Incorporate the Compliance and Control Department. Incorporate the SISGAS consultation channel. Improve general aspects.
3.0	16-04-2024	Document approval

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