

Anti-Bribery Policy – The State Attorney General’s Office (Procuraduría General del Estado - PGE)

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1. Introduction

The State Attorney General's Office (Procuraduría General del Estado – PGE), as the institution responsible for the legal defense of the State and the public interest, conducts its activities under the principles of integrity, transparency, and corruption prevention, within a context that requires the strengthening of institutional mechanisms to address risks such as bribery.

In accordance with this approach, through Resolution No. 112 of March 6, 2026, and Reform No. 115 of May 12, 2026, the PGE implements the requirements of ISO 37001:2025 to establish an Anti-Bribery Management System aimed at preventing, detecting, and addressing bribery.

Within this context, this Anti-Bribery Policy establishes the framework for anti-bribery management to strengthen integrity and mitigate bribery and corruption risks, as well as to promote a leading anti-bribery culture within the State Attorney General's Office (PGE). It also provides guidance to the institution's public employees and officials, within the scope of their activities, roles, and responsibilities, regarding the prohibition, prevention, detection, and response to bribery in all its forms.

2. Principles of the Anti-Bribery Policy

2.1 Prohibition of Bribery and Corruption

Public servers and officials of the State Attorney General's Office (PGE) shall not offer, promise, give, request, or accept, directly or indirectly, any gift, payment, benefit, or undue advantage, whether financial or non-financial in nature, that may influence or appear to influence their objectivity, independence, or the proper institutional decision-making process.

This principle extends to all interactions with third parties, including public servers or private-sector employees, suppliers, contractors, and other interested parties that maintain relationships with the institution, all of whom shall act in accordance with the same standards of integrity and transparency.

In case of any doubt, personnel shall apply public ethics criteria and refrain from engaging in any act that may be perceived as improper or contrary to the legal framework.

2.2 Prohibition of Improper Payments to Public Officials and Employees

Making or promising improper payments to other public officials for the purpose of obtaining, expediting, or securing the execution of procedures, decisions, or administrative actions is expressly prohibited.

Only those payments formally established under the applicable regulations, duly documented, and supported by official receipts issued by the competent authority shall be permitted

2.3 Conduct in Situations of Personal Safety Risk

In exceptional situations where there is a real and imminent threat to the life, integrity, or safety of a public server or employee, such individual may take the necessary measures to safeguard his or her personal integrity.

In such cases, any action taken shall be reported immediately to the competent institutional authority so that the corresponding verifications may be carried out and any appropriate administrative and corrective measures may be adopted.

2.4 Gifts, Hospitality and Similar Benefits

The acceptance or offering of gifts, courtesies, hospitality, or similar benefits shall strictly adhere to principles of reasonableness, proportionality, and transparency, and shall under no circumstances influence the independence or impartiality of public servers.

Any benefit that:

- Seeks to influence institutional decisions;
- Is excessive, inappropriate, or unrelated to institutional functions;
- Is contrary to public ethics or may adversely affect the institution's reputation;

Is expressly prohibited.

2.5 Prohibition of Improper Favors or Advantages

Public servers and officials of the State Attorney General's Office (PGE) shall not offer, request, or accept favors, privileges, or undue advantages that may compromise their independence or give rise to conflicts of interest.

This includes, among others:

- Personal or family benefits;
- Promises of employment or recruitment;
- Unjustified preferential treatment;
- Any other advantage that may affect impartiality in the exercise of public functions.

2.6 Relationships with Third Parties and Risk Management

The State Attorney General's Office (PGE) may engage with third parties within the scope of its institutional powers and responsibilities, ensuring that such relationships are based on the principles of legality, transparency, and accountability.

To this effect, the institution shall:

- Comply with all legal and administrative procedures applicable to recruitment and institutional management;
- Conduct appropriate due diligence processes according to the level of risk;
- Establish clear contractual obligations regarding compliance and integrity;
- Verify that payments are made only for services effectively rendered and under transparent conditions.

Public servers and officials responsible for managing such relationships shall adopt the necessary measures to ensure that third parties are aware of and comply with the provisions of this Anti-Bribery Policy.

3. Scope of the Anti-Bribery Management System (SGAS)

The Anti-Bribery Management System of the State Attorney General's Office (PGE) encompasses the governing, core, support, and decentralized processes associated with the fulfillment of the institution's mission. The scope includes the prevention, detection, reporting, investigation, and treatment of bribery risks throughout the national territory and, where applicable, in international actions related to the powers and responsibilities of the PGE.

4. Policy

The State Attorney General's Office (PGE), in fulfillment of its mission to advise, represent, and defend the interests and assets of the State in a preventive, proactive, and efficient manner, adopts a zero-tolerance position towards bribery in any form, whether direct or indirect, public or private, committed by its public servers, officials, or third parties.

The PGE is committed to:

1. Complying with all applicable legal, regulatory, institutional, and other anti-bribery requirements and commitments related to its activities.
2. Detecting, preventing, and addressing bribery risks through financial and non-financial controls, due diligence, oversight, investigation, and the continual improvement of the SGAS.
3. Promoting a culture of integrity, legality, transparency, responsibility, commitment, effectiveness, and quality, consistent with the institutional values of the PGE.

4. Ensuring accessible and confidential consultation and reporting channels, as well as protection against retaliation for those who, in good faith, report suspicions or violations.
5. Managing conflicts of interest and strengthening independence, objectivity, and traceability in decision-making processes. This is particularly relevant in advisory services, legality review, public procurement, mediation, arbitration, legal representation, and relationships with third parties.
6. Assigning the authority, responsibilities, and resources necessary for the effective operation of the SGAS and ensuring its review and continual improvement.
7. Designating the Anti-Bribery Function, guaranteeing its authority and independence in relation to the SGAS.
8. Applying disciplinary, administrative, and contractual measures in response to violations of this Policy and anti-bribery controls.

5. SGAS Objectives

Objective 1

To strengthen bribery prevention across all PGE processes through the identification, assessment, and treatment of bribery risks.

Objective 2

To increase the culture of integrity and anti-bribery capabilities of personnel and relevant third parties by ensuring training, awareness-raising activities, and formal compliance commitments.

Objective 3

To strengthen anti-bribery controls in decision-making processes and relationships with third parties through the incorporation of due diligence, anti-bribery commitment letters, contractual clauses, controls over payments, gifts and hospitality, and the supervision of external counsel, consultants, suppliers, and contractors.

Objective 4

To improve the effectiveness of the SGAS through monitoring, investigation, reporting, complaint handling, and continual improvement, ensuring that violations or bribery-related alerts are managed in a timely manner and with full traceability.

6. Procedures that Compromise the SGAS

1. Document Retention Control
2. Risk and Opportunity Management
3. Change Planning
4. Internal Audit
5. Management Review
6. Corrective Actions and Continual Improvement
7. Due Diligence

8. Financial Controls
9. Non-Financial Controls
10. Anti-Bribery Commitments
11. Controlled Organizations, Non-Controlled Organizations, and External Related Parties
12. Gifts, Hospitality, Donations, and Similar Benefits
13. Handling of Reports and Complaints, as well as Investigation Processes
14. Conflict of Interest Management

7. Interested Parties

Interested Party	Type	Needs and Expectations Relevant to the SGAS
Highest Authority of the PGE	Internal	Visible leadership, ethical decision-making, legal compliance, effective controls, reliable information for decision-making, and institutional and reputational protection.
Public Servers and Officials of the PGE	Internal	Clear guidelines, anti-bribery training, secure consultation and reporting channels, protection against retaliation, defined roles, and a culture of integrity.
Public sector entities integrated into the National System for the Legal Defense of the State (Article 225 of the Constitution of the Republic of Ecuador, public institutions, and public enterprises)	Direct External	Transparent coordination, uniform criteria, ethical legal advice and representation, impartial decisions, prevention of conflicts of interest, and rejection of any improper payment or undue advantage.
Public sector institutions subject to legality review and public procurement oversight (pursuant to Article 1 of the Organic Law of the National Public Procurement System)	Direct External	Objective, technical, and documented actions, traceability, timely responses, and controls that guarantee legality and transparency.
National Assembly	Direct External	Regulatory proposals and well-supported technical criteria, free from undue influence and aligned with the public interest.
Citizens	External	Transparency, accountability, honest use of public resources, effective protection of State assets, and institutional trust.
Higher Education Institutions / Academia	Direct External	Establish cooperation mechanisms to strengthen the capabilities of State legal teams through specialized academic support, coordination of training strategies for the dissemination of independent and ethical technical content, and promotion of a culture of integrity and anti-bribery standards within the academic environment.
Suppliers, Contractors, and Consultants	Direct External	Clear integrity rules, due diligence, objective procurement, transparent payments, anti-bribery clauses, and consequences for non-compliance.

External Lawyers and Specialized Law Firms	Direct External	Clear mandates, control of fees and expenses, oversight, reporting obligations, and compliance with anti-bribery commitments.
International and Cooperating Organizations	External	Ethical management, compliance, traceability, proper use of resources, reliable reporting, and solid controls.
Mediation and Arbitration Users	Direct External	Impartial treatment, transparency, integrity in decision-making, and absence of undue influence.
Media and Civil Society	External	Reliable public information, ethical conduct, institutional responsiveness, and evidence of integrity measures.
Environment	External	Integrity in all administrative, contractual, and oversight procedures where bribery risks may arise in connection with the use of natural resources, permits, authorizations, public procurement, works, services, or any activity that may have an environmental impact.

May 19, 2026

Approved by:

Ab. Juan Carlos Larrea Valencia

THE STATE OF ECUADOR'S ATTORNEY GENERAL (Procurador General del Estado)

Annex 1 – Regulations Related to this Policy

Annex 2 – Definitions and Abbreviations

Annex 1 – Regulations Related to this Policy

Link to the Policy	Regulation / Instrument	Definition / Description	Reference
External Regulatory Framework	Constitution of the Republic of Ecuador	Establishes the principles of legality, transparency, efficiency, and accountability in public administration.	Constitution of the Republic of Ecuador
External Regulatory Framework	Organic Law on Public Service (LOSEP)	Regulates the duties, rights, and responsibilities of public servers, including principles of ethics, probity, and administrative accountability.	LOSEP
External Regulatory Framework	Labor Code	Regulates employment relationships under the applicable labor regime, establishing rights, obligations, working conditions, and responsibilities of employees and employers.	Labor Code
External Regulatory Framework	Organic Law of the National Public Procurement System	Regulates public procurement processes under the principles of transparency, equality, competition, and legality.	LOSNCP
External Regulatory Framework	Internal Control Standards of the Office of the Comptroller General of the State.	Establishes the framework for risk management, integrity, internal control, and the prevention of fraud and corruption.	CGE Norms 200 and 300
External Regulatory Framework	National Public Integrity Policy	Establishes strategic guidelines for the prevention of and fight against corruption in the public sector.	Public Integrity Policy
International Regulatory Framework	ISO 37001:2025	Establishes the requirements for implementing, maintaining, and improving an Anti-Bribery Management System.	ISO 37001:2025
Internal Regulatory Framework	PGE Organic Statute for Process-Based Management	Defines the organizational structure, processes, and institutional powers and responsibilities, including the issuance of policies.	Resolution No. 103
Institutional Policy Framework	Institutional Code of Ethics	Establishes the values, principles, and standards of conduct for PGE public servers.	Code of Ethics
Internal Regulatory Framework	Resolutions of the Highest Authority	Administrative acts through which internal regulations, policies, guidelines, instructions, and other provisions necessary for the institutional management and operation of the State Attorney General's Office (PGE) are issued, approved, or amended.	Institutional Resolutions of the State Attorney General's Office (PGE)
Internal Regulatory Framework	Resolution No. 112 of March 6, 2026 / Resolution	Provides for the development and implementation of the Anti-Bribery Management System (SGAS) within the State Attorney General's Office (PGE),	Resolution No. 112 / Resolution No. 115

	No. 115 of May 12, 2026	establishes the designation of responsible parties for its implementation, compliance, and auditing, and sets forth institutional obligations related to the provision of resources, internal coordination, and technical support necessary for the implementation and compliance with ISO 37001:2025.	
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Annex 2 – Definitions and Abbreviations

Term/Abbreviation	Definition
SGAS	Anti-Bribery Management System of the State Attorney General's Office (PGE), comprising policies, procedures, controls, and mechanisms designed to prevent, detect, and address bribery, in accordance with ISO 37001:2025.
Bribery	The offering, promising, giving, accepting, or soliciting of an undue advantage, directly or indirectly, in order to influence the performance of duties or decisions, in violation of applicable regulations or the principles of public ethics.
Public Server(s)	Individuals providing services to the State Attorney General's Office (PGE) under any modality established by the Organic Law on Public Service (LOSEP), including public servers, officials, temporary personnel, and contracted personnel, who are subject to duties of integrity, transparency, and accountability.
Top Management	The highest authority of the State Attorney General's Office (PGE) and the management level responsible for strategic decision-making, establishing the Anti-Bribery Policy, and ensuring the effective implementation of the SGAS.
Anti-Bribery Function	The body or designated individuals within the PGE with the authority and independence to oversee, advise on, and implement the Anti-Bribery Management System.
SGAS Manager	A public official designated by the highest authority, responsible for implementing and coordinating the SGAS, ensuring compliance with ISO 37001:2025, and promoting an anti-bribery culture.
External Related Parties / Third Parties	External natural or legal individuals that maintain or seek to establish relationships with the PGE, such as suppliers, contractors, consultants, users, and others, within the framework of the Organic Law of the National Public Procurement System.
Interested Parties	A person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity.
Due Diligence	The process of risk analysis and assessment carried out by the PGE with respect to its personnel, processes, and third parties in order to prevent the occurrence of bribery or corruption, in accordance with the principle of proportionality.
Public Official	Any person exercising a public function within any entity of the Ecuadorian State, including authorities, public servers, agents, and representatives, in accordance with the Constitution and applicable legislation.
Gifts, Hospitality and Similar Benefits	Any gift, courtesy, invitation, service, or advantage offered or received within the institutional context, which must comply with principles of legality, reasonableness, and transparency without affecting the independence of the public server.

Undue Advantage	A benefit, payment, favor, or privilege to which a person is not legally or legitimately entitled, and which may improperly influence the conduct of a public server or third party.
Conflict of Interest	A situation in which the personal, family, or external interests of a public server may interfere with or affect the impartial exercise of his or her duties.
Donations	Voluntary transfers of resources permitted under applicable public-sector regulations that do not generate consideration or undue benefit for the PGE or its personnel.
Institutional Endorsements	Support permitted under the applicable legal framework for activities of public or institutional interest, as long as it does not involve a conflict of interest or undue advantage and complies with applicable regulations.
Improper or Facilitation Payments	Unofficial payments intended to expedite procedures or administrative actions, which are prohibited under Ecuadorian legislation and this Policy.
Reporting Channel	An institutional mechanism that enables confidential or anonymous reporting of possible acts of bribery, corruption, or non-compliance with the SGAS.
Bribery Risk	The likelihood of occurrence of situations related to bribery that may affect institutional objectives, the management of which forms part of the internal control system.
Internal Control	The set of policies, processes, and actions implemented to ensure transparency, efficiency, legality, and risk prevention in institutional management, in accordance with the standards of the Office of the Comptroller General of the State.