

<b>Oriental</b>	Policy title:	Complaint Procedures for Accounting, Auditing, Securities Law Compliance, and Other Matters
OFG-CP-CORP-004	Revision date:	01/2023

## Introduction

Section 301 of the Sarbanes Oxley Act of 2002, Rule 303A.06 of the Listed Company Manual of the New York Stock Exchange, and Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act requires that any listed company must disclose a method for any interested party to report their concerns directly to the Board of Directors.

## Purpose

The purpose of this policy is to establish procedures for OFG Bancorp, its subsidiaries and affiliates to facilitate the reporting of concerns or complaints as required by Section 301 of the Sarbanes Oxley Act of 2002, Rule 303A.06 of the Listed Company Manual of the New York Stock Exchange, and Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

## Applicability

This Policy applies to any interested party, including without limitation, employees and stockholders of OFG Bancorp.

## Revisions

DATE	TYPE	DESCRIPTION
12/2007	Approved	Board of Directors of OFG and OB.
04/2010	Ratified	Board of Directors of OFG and OB.
08/2011	Revised and Approved	Board of Directors of OFG and OB.
10/2014	Revised and Approved	Board of Directors of OFG and OB.
01/2015	Revised and Approved	Board of Directors of OFG and OB.
05/2018	Revised and Approved	Board of Directors of OFG and OB
04/2021	Revised and Approved	Board of Directors of OFG and OB
04/2022	Revised and Approved	Board of Directors
01/2023	Revised and Approved	Board of Directors

## Definitions

TERM	DEFINITION
1. Interested Party	Any person or organization who may be affected or have an economic interest with OFG Bancorp and/or its subsidiaries.

## References

- Section 301 of the Sarbanes Oxley Act of 2002
- Rule 303A.06 of the Listed Company Manual of the New York Stock Exchange
- Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

## Policy Statement

Any interested party, including, without limitation, employees and stockholders of OFG Bancorp (the “Company”), may communicate directly with the independent members of the Company’s Board of Directors or submit a good faith complaint regarding accounting, auditing, securities law compliance, and other related matters to the management of the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls, and audit practices. The Company’s Audit Committee will oversee treatment of complaints or concerns in these areas.

In order to facilitate the reporting of concerns or complaints as required by Section 301 of the Sarbanes-Oxley Act of 2002 and Rule 303A.06 of the Listed Company Manual of the New York Stock Exchange, the Audit Committee has established the following procedures for (i) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, auditing, securities law compliance, and other related matters; (ii) the confidential, anonymous submission by interested parties of concerns regarding questionable accounting, auditing, securities law compliance, and other related matters; and (iii) the direct communication of concerns by interested parties to the independent members of the Company’s Board of Directors. All accounting, internal accounting controls, auditing, securities law compliance, and other matters covered by these procedures are collectively referred to herein as “Covered Matters.”

### Scope of Matters Covered by These Procedures

These procedures relate to interested party concerns or complaints relating to any Covered Matter, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company’s internal accounting controls;
- misrepresentation or false statement to or by a director, officer, employee, auditor or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- deviation from full, fair and accurate reporting of the Company’s financial condition and results of operations;
- violation of the federal securities laws; and
- misappropriation of Company assets.



### **Receipt of Concerns or Complaints**

Interested parties with concerns or complaints regarding Covered Matters may report such concerns or complaints in writing or by telephone on a confidential, anonymous basis via the following:

Writing: Whistleblower hotline “Ethics Point” available online at <https://secure.ethicspoint.com/domain/media/en/gui/20510/index.html>

Telephone: Whistleblower “Ethics Point” hotline- toll-free, within the United States, Guam, Puerto Rico and Canada: 888-366-6023

### **Treatment of Complaints**

Upon receipt of any such concern or complaint, the Internal Audit Department designee will review it to (i) determine whether the concern or complaint actually pertains to Covered Matters, and (ii) if not, will reclassify and redirect it to the designated unit, based upon the complaint matter.

Interested party concerns or complaints relating to Covered Matters will be reviewed under the Audit Committee’s direction and oversight by the Company’s Internal Audit Managing Director, General Counsel and/or outside legal counsel, or such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.

The Company will not discharge, demote, suspend, threaten, harass, directly or indirectly, or in any other manner discriminate against any employee or whistleblower in the terms and conditions of employment because of any lawful act done by such employee or whistleblower with respect to good faith reporting of concerns or complaints regarding Covered Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002 or Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

### **Reporting and Retention of Complaints and Investigations**

At the direction of the Audit Committee, the Company’s Internal Audit Managing Director, General Counsel and/or the Secretary of the Board of Directors will maintain a log of all such concerns and complaints, tracking their receipt, investigation and resolution. If complaints related to the Covered Matters are received, the Internal Audit Managing Director or designee shall report it to the Audit Committee, including a periodic reporting of the complaint investigation status until its resolution. Copies of such concerns and complaints will be maintained in accordance with the Company’s document retention policy.

