

BANCO LATINOAMERICANO DE COMERCIO EXTERIOR, S.A.

AUDIT COMMITTEE CHARTER

I. Purpose

The Audit Committee (the “Committee”) of Banco Latinoamericano de Comercio Exterior, S.A. (the “Bank”), is a standing committee of the Board of Directors. The purpose of the Committee is to perform certain functions required by applicable regulations and to assist the Board in fulfilling its responsibilities to oversee the financial reporting process, the integrity of the Financial Statements, the system of internal controls, the audit process and the process for monitoring compliance with laws and regulations and the Code of Ethics.

II. Organization and Composition

The Committee shall consist of at least three independent directors. Their independence will be determined in accordance with the applicable rules and regulations (See appendix). At least one of the members of the Committee must be a “financial expert”. The Committee shall determine that at least one of its members satisfies this requirement.

The members of the Committee and its Chair shall be elected and removed by the Board. Such members shall be appointed for a term of one year, but may be reappointed indefinitely.

III. Duties

The Committee shall have the following duties:

A) Financial Statements

- Review significant accounting and financial reporting issues, including unusual or complex transactions, and understand their impact on the financial statements. Be aware of regulatory and professional pronouncements that have an effect or impact on the financial statements.
- Review with the Banks’ Management and the external auditors the results of the audits of the financial statements.
- Evaluate whether the audited quarterly and annual financial statements are complete, consistent with information known to the members of the Committee, and appropriately reflect accounting principles. Recommend the Financial Statements’ approval to the Board of Directors.
- Review the sections of the Bank's Annual Report on Form 20-F for accuracy and completeness prior to filing with the Securities and Exchange Commission.
- Receive reports from the external auditors regarding matters that auditing standards require to be reported to the Committee.

B) Internal Control

- Monitor the effectiveness of the Bank's internal control system, understanding the

security and control of information technology.

- Know the results of the analyses performed by the internal and external auditors, in particular their significant findings and recommendations, together with the responses of the Bank's Management.

C) Internal Audit

- Approve the Charter, structure and activities of Internal Audit.
- Review and approve the Internal Audit Manual and notify the Board of its approval.
- Approve the annual internal audit plan and review the progress of its implementation.
- Understand the results of internal and external audits performed and compliance with agreed action plans on findings identified as a result of the audits.
- Approve and recommend to the Board the annual budget of the Internal Audit function to ensure that it has the resources necessary to carry out its responsibilities.
- Monitor the effectiveness of the Internal Audit function, including compliance with international standards applicable to this activity, such as the International Professional Practices Framework of Internal Auditing.
- Recommend to the Board the selection, appointment and dismissal of the Chief Internal Auditor and review the annual performance level, compensation and succession plan.
- Ensure that there are no restrictions or limitations on the work of the Internal Audit function and that the Internal Audit function has the resources necessary to carry out its responsibilities.

D) External Audit

- Review, approve and monitor the progress of the External Audit plan and report to the Board.
- Recommend to the shareholders, at the Annual General Meeting, the ratification or replacement of the Bank's external auditors and the approval of their fees. The External Auditors shall report directly to the Committee.
- Review the performance of the external auditors.
- Approve all audit and non-audit services, including tax services, provided to the Bank by the external auditors.
- Confirm the independence of the external auditors, obtain specific representations from the auditors regarding the relationship between the auditors and the Bank, and present its conclusions to the Board.
- Meet privately with the Bank's external auditors at least once a year to discuss such matters as the Committee or the external auditors deem appropriate.

E) Bank Code of Ethics

- Ensure compliance with the Bank's Code of Conduct, applicable laws, rules and regulations.

- Be informed of any proposed changes to the Code of Ethics, analyze the changes and recommend to the Board of Directors whether or not to ratify them.
- Evaluate the seriousness of potential violations committed during the Window and Blackout Periods and take appropriate disciplinary action.
- Take all appropriate steps to investigate any potential violation reported to them and, if a violation has occurred, consider the appropriate action, which may include both a review and modification of applicable policies and procedures or a recommendation of dismissal.

F) Other tasks

- Report regularly to the Board and annually to the Shareholders' Meeting on the activities and decisions of the Committee.
- Perform any other oversight activities consistent with the Bank's Articles of Association, Bylaws and applicable laws, that the Committee or the Board of Directors deems necessary or appropriate.
- Evaluate requests for risk acceptance by Management, particularly in cases where it is decided not to take corrective action as recommended by internal or external audit or other control body.
- Initiate special investigations as deemed necessary.

The Bank's Board of Directors has delegated to the Committee sufficient authority and powers to adopt binding resolutions in order to carry out the duties, functions and responsibilities described in this Charter. The resolutions adopted by the Committee pursuant to this delegation of powers and authority shall not at any time conflict with the Bank's Articles of Association or Bylaws, the Committee's Charter, or the resolutions of the Bank's shareholders or Board of Directors.

IV. Meetings and Resolutions

The Committee shall meet at least six times a year, with the frequency required by the Superintendency of Banks of Panama. The meetings of each Committee shall be convened by its Chairman or at the request of two of its members. Such meetings shall be held at the place, date and time specified in the respective notice. The notice of the meetings shall include the agenda, which shall be sent to the members of the Committee in advance, together with the necessary materials for each meeting. The Committee may also meet by telephone or video conference (virtual).

The presence of a majority of the members of the Committee is required to constitute a quorum.

Meetings of the Committee shall be chaired by its Chairman or, in his absence, by an ad hoc Chairman appointed at the meeting.

All decisions of the Committee shall be made by the affirmative vote of a majority of its members.

The discussions and resolutions of the Committee shall be recorded in minutes, which shall be

numbered, signed by the Chairman and the Secretary and kept in the minute book of the Committee, which may be kept in electronic form.

The Committee may also adopt written resolutions in lieu of a meeting, provided that the text of the resolution adopted has been previously communicated to all members of the Committee and that the resolution is approved by the affirmative vote of not less than a majority of its members. Such vote may be recorded in any written or electronic medium, including facsimile and e-mail, but if so recorded, a written resolution shall thereafter be prepared and signed by the members of the Committee who voted in favor of such resolution and shall be recorded in the minutes of the Committee.

Each year, the Executive Vice President of Audit will hold a private meeting with the Audit Committee (without the Management present) to discuss issues at the discretion of the Executive Vice President of Audit and/or the members of the Committee.

V. Committee Authority and Resources

The Committee shall have the authority to authorize and conduct investigations into matters within its scope of responsibility. The Committee shall have the authority and resources to:

- Engage independent counsel, accountants or other experts to advise the Committee or to assist it in conducting an investigation.
- Obtain any information it deems necessary from any employee of the Bank, who shall be required to cooperate with the Committee's requests, or from any third party.
- Meet with the Bank's senior management, external auditors, or outside legal counsel as it deems necessary.

VI. Interaction with Bank Management

The Chief Internal Auditor, the Executive President of the Bank, and such other staff members or guests as the Committee deems appropriate shall attend the regular meetings of the Committee as guests.

The Chief Internal Auditor, or his or her designee from the Internal Audit Department, shall act as Secretary of the Committee and shall be responsible for taking the minutes of each meeting.

VII. Compensation

The members of the Committee shall receive such compensation as may be determined by the Board.

VIII. Performance Evaluation

The Committee shall conduct an annual self-evaluation of its performance.

IX. Review of this Charter

The Committee shall review this Charter at least annually and recommend to the Board for approval any changes it deems necessary.

X. Amendments

This Charter may be amended by the Board of Directors of the Bank whenever it deems it appropriate or upon a proposal from the Audit Committee.

Last revision: Approved by the Board of Directors at its meeting of February 24, 2025.

Appendix I

Criteria for qualifying as an independent Director under current regulations.

A. Superintendency of Banks of Panama (SBP)

Agreements No. 005-2011 and No. 005-2014 “Agreements on Corporate Governance” of the Superintendency of Banks of Panama (SBP) establish that an independent director is a member of the Board of Directors of the Bank who:

1. Is not, and has not been for the last five years, employed by the Bank, any entity that is part of its banking group, or any of its non-banking affiliates.
2. Is not, and is not affiliated with, a consulting or advisory firm of the Bank, any entity that is part of its banking group, or any of its non-banking affiliates.
3. Is not, and is not related to, a significant customer of the Bank, any entity that is part of its banking group, or any of its non-banking affiliates. For the purposes of this paragraph, a significant customer is not a natural person who is a banking consumer as defined in Article 199 (1) of the Banking Act.
4. Is not, and is not related to, a significant supplier of the Bank, any entity that is part of its banking group, or any of its non-banking affiliates. For the purposes of this paragraph, a significant supplier is not a supplier whose sales to the Bank are less than 5% of its total sales.
5. Does not have a professional services contract with the Bank, any entity that is part of its banking group, any of its non-banking affiliates, or any member of its senior management.
6. Is not employed as an officer of a company in which an officer of the Bank, any entity that is part of its banking group, or any of its non-banking affiliates serves on the board of directors of that company.
7. Is not the spouse or a relative, within the fourth degree of consanguinity or the second degree of affinity, of any person who (1) is or has been employed as an executive officer of the Bank, any entity that is part of its banking group, or any of its non-banking affiliates, or (2) is or has been a member of the Board of Directors of the Bank, any company that is part of its banking group, or any of its non-banking affiliates within the past two years.
8. Is not, nor has been within the last two years, affiliated with or employed by a current or previous year's auditor of the Bank, any entity that is part of its banking group, or any of its non-banking affiliates.
9. Is not the beneficial owner, directly or indirectly, of shares issued by the Bank, any entity that is part of its banking group or any of its non-banking affiliates in an amount equal to or greater than 1% of the total issued and outstanding voting shares.

B. Section 303A.02 of the New York Stock Exchange (NYSE) Listed Company Manual.

Section 303A.02 of the NYSE Listed Company Manual provides that a Director will be deemed not to be independent if the Board determines that:

1. The director is, or has been within the last three years, an employee of the Bank, or an immediate family member is, or has been within the last three years, an executive officer,

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of the Bank.

2. The director has received, or has an immediate family member who has received, during any twelve-month period within the last three years, more than \$120,000 in direct compensation from the Bank, other than director and committee fees.
3. (A) The director or an immediate family member is a current partner or employee of a firm that is the Bank's internal or external auditor; (B) the director has an immediate family member who is a current partner of such a firm; (C) the director has an immediate family member who is a current employee of such a firm and personally works on the listed company's audit; or (D) the director or an immediate family member was within the last three years a partner or employee of such a firm and personally worked on the listed company's audit within that time.
4. The director or an immediate family member is, or has been with the last three years, employed as an executive officer of another company where any of the Bank's present executive officers at the same time serves or served on the compensation committee.
5. The director is a current employee, or an immediate family member is a current executive officer, of a company that has made payments to, or received payments from, the Bank for property or services in an amount which, in any of the last three fiscal years, exceeds the greater of \$1 million, or 2% of such other company's consolidated gross revenues.

General Commentary to Section 303A.02(b): An "immediate family member" includes a person's spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone (other than domestic employees) who shares such person's home. When applying the look-back provisions in Section 303A.02(b), listed companies need not consider individuals who are no longer immediate family members as a result of legal separation or divorce, or those who have died or become incapacitated.