

## EQUAL EMPLOYMENT OPPORTUNITY POLICY AFFIRMATIVE ACTION PROGRAM

Popular, Inc. and its subsidiaries ("Popular") promote a work environment where diversity and inclusion are embraced, and differences are valued and respected. In addition, Popular offers equal employment opportunity and does not discriminate against any employee or applicant for employment due to their race, color, religion, age, sex, pregnancy, sexual orientation, gender identity, national origin, political affiliation or ideas, social condition, marital status, disability, eligible or disabled veteran status, for being a victim of domestic violence (including stalking and/or sexual aggression) or being perceived as such, genetic information about the person or relatives, or any other characteristic protected by applicable law. Employment decisions are based solely on job related criteria, in accordance with applicable laws that prohibit employment discrimination.

Popular has established a written Affirmative Action Plan (the "Plan") in compliance with the Federal Executive Order No. 11246 of September 24, 1965, as amended, section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"), and the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended ("VEVRAA). The Plan is intended to avoid employment practices that may conflict with our antidiscrimination policy. Popular takes affirmative action in the following areas: hiring, promotions, demotions, transfers, evaluations, trainings, terminations, salary and other forms of compensation, among others.

Employees and job applicants will not be subjected to harassment, intimidation, threats, coercion, discrimination or retaliation for having engaged in or subsequently engaging in any of the following activities: (1) filing a complaint pursuant to Section 503, VEVRAA or any other applicable laws requiring affirmative action or equal employment opportunity; (2) assisting or participating in an investigation, audit or compliance review, hearing or any other activity related to the implementation of Section 503, VEVRAA, or any other applicable laws requiring affirmative action or equal employment opportunity; (3) opposing any act or practice prohibited by Section 503, VEVRAA, or any other applicable laws or regulations requiring affirmative action or equal employment opportunity; or (4) exercising any other right protected by Section 503, VEVRAA or any other applicable laws.

In addition, Popular will not discharge employees or in any other manner discriminate against employees or job applicants because they have inquired about, discussed or disclose their compensation or the compensation of other employees or job applicants. However, employees who, as part of their essential job functions, have access to information about the compensation of other employees or job applicants cannot disclose said information about other employees or job applicants to individuals who otherwise do not have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing or action, including an investigation conducted by the employer, or (c) consistent with Popular's legal duty to furnish information. Moreover, Popular will not incur in pay discrimination based on sex against employees who perform comparable work, as such term is defined in the applicable legislation, unless there is a legitimate reason for doing so.

All managers and supervisors are responsible for the achievement of the Affirmative Action Plan's objectives in offering Equal Employment Opportunities. If you believe that we have not complied with our policy or if you would like to identify yourself as an individual with a disability, a qualified disabled veteran, a veteran of the Vietnam Era or a veteran of any other military conflict, please contact Inez García Rosado, Manager at the Our People Division, at (787) 723-0077, extension 3475. You may also submit a confidential report regarding any deviation from this policy through EthicsPoint at 1-866-737-6813 (from the United States or Puerto Rico), 866-737-6850 preceded by the applicable long-distance code (from other countries) or via www.popular.com/ethicspoint-en. All employees and applicants for employment may request a copy of our Affirmative Action Plan by visiting the Our People Division located on the 5<sup>th</sup> floor of the Banco Popular Building, 1500 Ponce de Leon Avenue, Santurce, from Monday through Friday during business hours.

Ignacio Alvarez

President & Chief Executive Officer

Popular, Inc.

Revised January 2020