WHISTLEBLOWER POLICY

Central Bancompany, Inc. (the "Company") has adopted this Whistleblower Policy (this "Policy") for Company officers, board members, employees, contractors, agents, and consultants to communicate concerns regarding accounting, internal accounting controls or auditing matters to the Audit Committee of the Board of Directors of the Company (the "Board") and other matters (as discussed below) to non-management directors. This Policy is intended to encourage and enable anyone working for, under the direction of, or on behalf of the Company to raise such concerns, no matter whom such concerns involve, without fear of retaliation due to such reporting. The Company fully supports ethical conduct, compliance with applicable laws, and transparency and accountability in business practices.

All concerns regarding accounting, auditing, internal controls or other matters relating to violations of the federal securities laws, fraud, or other actual or potential violations of law, regulation, or Company policy may be communicated, in a confidential or anonymous manner, to the Company's Human Resources Department, Legal Department or by calling the Company's hotline (1-800-747-1428) or at www.mycompliancereport.com using code CTBEH. The hotline is available 24 hours a day and requires the caller to identify the concern in as much detail as possible. Complaints and concerns reported through the Company's hotline are received by the Chief Audit Officer of the Company, who will consult with the Legal and Human Resources Departments as necessary.

Whether reported directly to Legal, Human Resources, or through the Company's reporting line, all such concerns will be treated confidentially to the maximum extent possible consistent with applicable law and the Company's obligation to conduct thorough investigations. Confidentiality may not always be possible or appropriate in circumstances when disclosure of information is necessary to conduct the investigation or is required by law. To the extent possible, confidentiality of the complaint and the identity of the complainant will be maintained.

The Chief Audit Officer, Human Resources, and/or Legal will review all reported concerns to determine whether such concerns are appropriate to be reported to the Audit Committee of the Board (the "Audit Committee") or non-management directors. A complaint or concern may not be reported upward if it is not the type of complaint or concern contemplated by this Policy (such as a concern involving only an employment dispute). The complaints and concerns that do not fall within the scope of this Policy will be investigated in accordance with the Company's policies and procedures for those types of complaints or concerns. If a complaint implicates or involves the Chief Audit Officer or a specific officer in the Human Resources or Legal Departments, that person will be recused from participating in the investigation.

The Chief Audit Officer will communicate concerns regarding accounting, auditing, internal accounting controls and matters relating to violations of federal securities laws, fraud, or other actual or potential violations of law or regulation to the Audit Committee prior to each meeting of the Audit Committee (or more promptly, as appropriate). Other concerns will be reported to non-management directors prior to each executive session of non-management directors (or more promptly, as appropriate). If it is unclear whether a concern involves accounting or auditing matters or if it involves both accounting or auditing matters and other matters, the concern will be reported to both the Audit Committee and non-management directors, with a note to that effect.

In each case (and except as the Audit Committee or non-management directors may otherwise request), the Chief Audit Officer, Human Resources, and/or Legal Departments will provide a summary of the concerns, along with the original copy or record of any concerns deemed particularly important. The original copies or records of all concerns will be available to any Audit Committee member or non-management director, as applicable, upon request.

Audit Committee members or non-management directors, as applicable, will review concerns and determine whether any action or response is necessary or appropriate. If so, they will take or direct prompt and appropriate corrective action as warranted in the judgment of the Audit Committee or non-management directors, as applicable. Such action may include engaging outside advisers, for which funding will be available. Prompt and appropriate corrective action will be taken when deemed necessary, up to and including dismissal or termination of employment or contract or further reporting to the necessary authorities. It may not always be possible to provide full details of any remediation action taken, based on the relevant laws and action necessary.

The Chief Audit Officer will maintain a log of each concern received, tracking its receipt, when it was reported to the Audit Committee or non-management directors, as applicable (and to which of these it was reported) and the determination and any further action taken in respect of such concern (with a record of the action taken and its outcome) or if no further action was required because the concern could be analyzed on its face. This log and the underlying concerns shall be placed in confidential files and retained for an appropriate period of time in accordance with legal requirements and the Company's document retention policies. These files will be under the direct control of the Audit Committee or the non-management directors, as applicable.

The Chief Audit Officer or any other person designated by the Audit Committee or non-management directors will report on the status of any pending concerns, reviews of such concerns and corrective actions directed by the Audit Committee or non-management directors on a quarterly basis (or more frequently if necessary).

The Company strictly prohibits any retaliation for the reporting of a possible violation of law, ethics or firm policy in good faith, no matter whom the report concerns. Anyone involved in threatening or carrying out retaliatory behavior may be subject to disciplinary action, up to and including dismissal or termination of employment or contract as appropriate. Reports made in bad faith or for malicious or misleading purposes, however, may lead to discipline.