

Republic of Panama
Superintendency of Banks of Panama

RESOLUTION SBP-BAN-R-2024-00705

December 18, 2024

THE SUPERINTENDENT OF BANKS,
In exercise of its legal powers, and

WHEREAS:

GRUPO BANDELTA HOLDING CORP. is a company duly incorporated and registered under the laws of the British Virgin Islands, owning 100% of the issued and outstanding shares of **GRUPO FINANCIERO BANDELTA, S.A.**

GRUPO FINANCIERO BANDELTA, S.A. banking entity organized and existing under the laws of the Republic of Panama, authorized to conduct banking business in or from the Republic of Panama under a General Banking License granted by Resolution S.B.P. No. 163-2010, dated July 19, 2010, issued by this Superintendency.

MCNEEL CAPITAL LLLP is a company incorporated and registered under the laws of the State of Florida, United States of America, holding 12.47% of the shares of **GRUPO BANDELTA HOLDING CORP.**

FIAMO INTERNATIONAL, INC. is a company incorporated and registered under the laws of the British Virgin Islands, holding 17.58% of the shares of **GRUPO BANDELTA HOLDING CORP.**

CAMS, INC. is a company incorporated and registered under the laws of the Bahamas, holding 29.28% of the shares of **GRUPO BANDELTA HOLDING CORP.**

TREETOP FIRST CORPORATION is a company incorporated and registered under the laws of the Republic of Panama, holding 29.22% of the shares of **GRUPO BANDELTA HOLDING CORP.**

MCNEEL CAPITAL LLLP and **FIAMO INTERNATIONAL INC.**, as sellers, and **CAMS, INC.** and **TREETOP FIRST CORPORATION**, as buyers, jointly submitted, through their respective legal representatives, a formal request for the acquisition of 30.05% of the shares of **GRUPO BANDELTA HOLDING CORP.**, under the terms and conditions detailed in the proposed transaction.

The aforementioned request has been submitted in accordance with the provisions of Banking Rule No. 1-2004, as amended by Banking Rule No. 4-2021, which establishes the criteria for evaluating requests for the transfer of shares within the same Economic Group.

Following the corresponding analyses, the submitted request raises no objections, and;

In accordance with Article 16 (I.7) of the Banking Law, it is the responsibility of the Superintendent of Banks to decide on requests of this nature.

RESOLVES:

SOLE ARTICLE: To authorize the transfer among the same Economic Group of **GRUPO BANDELTA HOLDING CORP.**, of 30.05% of shares kept by **MCNEEL CAPITAL LLLP** and **FIAMO INTERNATIONAL, INC.** in favor of the companies **CAMS, INC.** and **TREETOP FIRST CORPORATION**, pursuant to the terms established in the proposed transaction.

[QR-CODE]

Official document signed with a Qualified Electronic Signature through the Superintendency of Banks of Panama's Document Transparency System – TRANSDOC, in accordance with Law 83, dated 9 July 2012, and Executive Decree, dated 11 May 2018. Please use the QR Code or of the following URL address to verify the authenticity of this document: <https://sigob.superbancos.gob.pa/consulta?id=MA6vftTQHFtrKiEUqxqviYNK7mccuup5phW%2F3SYe4sc%3D>

LEGAL GROUNDS: Article 16 (I.7) of the Banking Law, rule No. 1-2004 dated December 29, 2004, amended by Rule No. 4-2021 dated October 19, 2021.

Issued in Panama City on the eighteenth (18th) day of December of the year two thousand twenty-four (2024).

FOR COMMUNICATION, PUBLICATION AND ENFORCEMENT.

THE SUPERINTENDENT OF BANKS

(Signed)
Milton Ayón Wong

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