



Corporate Governance Framework

Grupo Supervielle S.A.

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1. INTRODUCTION

Grupo Supervielle S.A. (hereinafter, “Grupo Supervielle,” or the “Company”, interchangeably) is a platform that provides a broad range of financial and non-financial services to its customers and has more than 130 years of experience operating in Argentina. The Company focuses on delivering fast solutions to its customers and on effectively adapting to the evolution of the industry in which it operates. It provides its services through different platforms and brands and has developed a diversified ecosystem to address its customers’ needs and digital transformation. As of the date hereof, Grupo Supervielle operates through a network of 130 bank branches, virtual branches, and its digital channels under the Supervielle, IOL Invertironline and IOL Inversiones brands, together with a network of alliances, serving approximately 2 million active customers.

Since May 2016, Grupo Supervielle’s shares have been listed on Bolsas y Mercados Argentinos S.A. (hereinafter, “BYMA”) and the New York Stock Exchange (hereinafter, “NYSE”).

Grupo Supervielle’s main subsidiaries are Banco Supervielle S.A. (hereinafter, the “Bank”), which is the seventh-largest private bank in Argentina in terms of loans, and Invertironline S.A.U. (hereinafter,

“IOL”), Argentina’s leading digital platform for retail brokerage services, specializing in online trading and other financial investment services. Other significant subsidiaries, in addition to the Bank and IOL, are: (i) Supervielle Seguros S.A., an insurance company; (ii) Supervielle Productores Asesores de Seguros S.A., an insurance brokerage company; (iii) Supervielle Asset Management S.A., a company engaged in the management of mutual funds; (iv) Supervielle Agente de Negociación S.A.U., a broker that provides services to institutional and corporate clients; (v) Micro Lending S.A.U., a company specialized in automobile financing; and (vi) Espacio Cordial de Servicios S.A., a distributor of assistance products.

The following subsidiaries are also part of Grupo Supervielle: Sofital S.A.U.F. e I., a holding company that is a shareholder of the same companies owned by Grupo Supervielle; IOL Holding S.A., a holding company incorporated in Uruguay that directly controls IOL, Portal Integral de Inversiones S.A.U., and the Uruguayan company IOL Agente de Valores S.A.

The vision pursued by the Company drives it to be an agile, innovative and competitive financial services group that can be part of its customers’ everyday lives.

2. OUR COMPANY

How is our subsidiary structure organized?

Each of our subsidiaries has a Board of Directors and a management structure appropriate to the nature of its activities and its level of complexity. In order to

strengthen the accountability framework and information flows, each subsidiary is accountable to the Board of Directors of Grupo Supervielle.

Legal framework under which we operate

We are a *sociedad anónima* incorporated in the Argentine Republic and subject to the General Companies Law No. 19,550 and its supplementary and amending regulations (hereinafter, “LGS”). In addition, as we are admitted to the public offering regime, we are subject to the regulations issued by the National Securities Commission (hereinafter, “CNV”).

Likewise, our subsidiaries are subject to the specific regulations issued by the regulators that oversee their activities. Such regulators include the Central Bank of the Argentine Republic (hereinafter, “BCRA”), the CNV, the National Insurance Superintendency (hereinafter, “SSN”), the Office of the General Inspectorate of Justice (hereinafter, “IGJ”), and the Financial Information Unit (hereinafter, “UIF”). In addition, together with our subsidiaries, we must comply with certain regulations issued by the markets in which we operate, including BYMA, the NYSE and A3 Mercados S.A., among others.

Risk Management

We promote a sound and efficient risk management organization, with an appropriate framework to optimize the use

of capital and identify attractive business opportunities, markets and geographic areas in which we operate, seeking the best risk-return profile for our shareholders. The risk management framework is communicated throughout the organization and aims to strike a balance between fostering a robust risk culture and being an innovative, customer-centric company, recognized for its agile, simple and approachable way of operating.

At Grupo Supervielle, we have a Corporate Risk Management Department responsible for defining and monitoring the general risk policies to be followed by the subsidiary companies. Each subsidiary manages its risks based on specific guidelines, in line with the nature and scale of its businesses.

Our risk management policy incorporates these guidelines, consolidating into a single framework the standards and directives issued by the Board of Directors and adopted by the Company for the identification, measurement and management of risks.

In addition, Grupo Supervielle implements and maintains in force the Anti-Money Laundering and Terrorist Financing Prevention Policy, in compliance with the applicable regulations on the prevention of money laundering and terrorist financing.

3. OUR CORPORATE GOVERNANCE STRUCTURE

Corporate governance is the set of principles, practices, processes and structures through which companies are directed and controlled. This management system promotes corporate governance best practices through actions aimed at transparency, accountability and respect for shareholders, integrating economic and financial, social and environmental aspects

in a balanced manner into corporate decision-making.

In general terms, sound corporate governance practices contribute to creating an environment of trust and transparency, aimed at fostering long-term investment, financial stability and integrity in the conduct of business. For this reason, the adoption of such practices helps optimize

relationships with investors, while at the same time serving as an incentive for management to align its decisions with the protection and promotion of the interests of the Company and its shareholders. In this way, corporate reputation in the market is strengthened, resulting in the sustained creation of value for shareholders and investors.

Grupo Supervielle has a Corporate Governance Code that formalizes and establishes standards of conduct and governance practices based on strict criteria for transparent disclosure of information, operational efficiency, internal control, business ethics, investor protection, equitable treatment of investors and corporate transparency, with the aim of creating and preserving value for the Company, its shareholders, customers, employees and other stakeholders.

Shareholders' Meeting

Our Shareholders' Meeting is the Company's highest decision-making and governing body and serves as the forum in which our shareholders meet on a regular basis in order to adopt the resolutions that fall within their purview pursuant to applicable law and the bylaws.

In accordance with the LGS and CNV regulations, we are required to hold an Annual Ordinary Shareholders' Meeting within four months following the close of the fiscal year. Shareholders' Meetings may also be Extraordinary, depending on the matters to be considered. Likewise, an Ordinary or Extraordinary Shareholders' Meeting must be convened whenever deemed necessary by our Board of Directors or the Supervisory Committee, or when requested by shareholders representing at least five percent (5%) of the share capital.

We make available to our shareholders, within the time periods established by the applicable regulations, all relevant

information relating to the holding of the Shareholders' Meeting, the documentation to be considered thereat, and the proposals submitted by the Board of Directors.

Our Board of Directors

The Board of Directors is the management body of the Company and its mission is to protect and enhance our assets, ensure their long-term sustainability, ensure compliance with applicable laws and regulations, and maximize return on investment for shareholders.

Our Board of Directors provides strategic leadership and is responsible for approving and overseeing the implementation of the Corporate Governance Code, promoting and reviewing general business and risk management policies and strategies, and ensuring that the various management levels implement the necessary actions to identify, monitor and mitigate the risks assumed. In addition, the Board of Directors actively fosters strategic reflection, innovation and the transformation of the business model, promoting the creation of sustainable long-term value for shareholders and other stakeholders.

How is our Board of Directors composed?

Our Board of Directors is composed of the number of regular directors determined by the Shareholders' Meeting, with a minimum of three and a maximum of nine members. The Shareholders' Meeting may appoint alternate directors in the same or a smaller number than the regular directors and for the same term, in order to fill any vacancy of regular directors for any reason, following the order of their election.

If the Shareholders' Meeting appoints between three and nine regular members, they shall serve a term of two fiscal years. If the Meeting sets the number of regular directors at nine, the term of office shall be three fiscal years. Each year, a proportional portion of the Board of Directors shall be

renewed, according to the number of members appointed by the Meeting. Directors shall be eligible for re-election.

Independence criteria

Our Board of Directors must be composed of a sufficient number of independent directors to ensure compliance with applicable regulations, as well as with the requirements for the composition of the various committees that require such condition.

Independent directors are those external, non-executive directors who are not subject to any of the situations set forth in Capital Markets Law No. 26,831 (hereinafter, "LMC"), the CNV rules and the regulations of the markets on which the Company's shares are listed.

The shareholder who proposed a director at the Shareholders' Meeting must disclose the candidate's independence status, in accordance with the applicable regulations.

Appointment of Directors

Pursuant to the provisions of the LGS, the appointment of the members of the Board of Directors falls within the authority of the Ordinary Shareholders' Meeting.

At Grupo Supervielle, we adopt as a fundamental premise adherence to the commitment to non-discrimination, not only with respect to the appointment of directors, but also in relation to any circumstance, whether in the internal or external sphere. These standards of conduct are set forth in the Code of Ethics.

Board management evaluation

The Ordinary Shareholders' Meeting annually reviews the management and performance of the Board of Directors when considering the matters set forth in Section 234, items 1 and 2, of the LGS.

In turn, our Board of Directors carries out an annual self-assessment process of its performance, in line with the guidelines and criteria developed by the Nominations and Remuneration Committee and the Ethics, Compliance & Corporate Governance Committee. As a result of this process, an annual report is prepared which includes, among other aspects, the Board's structure, culture, information and resources, processes and dynamics, as well as each director's self-assessment of their performance on the Board and on the committees in which they participate.

Board Committees

At present, we have the following Board Committees: (i) Audit Committee; (ii) Risk Management Committee; (iii) Ethics, Compliance & Corporate Governance Committee; (iv) Nominations and Remuneration Committee; (v) Disclosure Committee; (vi) Cybersecurity Committee; and (vii) Committee for the Analysis of Operations with Related Parties.

The structure of the Board Committees has been designed to ensure technical depth, appropriate segregation of duties, agility in decision-making and effective oversight, while avoiding unnecessary overlap.

Our Board of Directors may, if it deems appropriate, decide on the creation and composition of an Executive Committee and/or other Board Committees, as well as establish their organizational structure, functions and scope of authority. Each Committee has its own internal regulations, and the actions or resolutions adopted by such bodies must be periodically reported to the Board of Directors.

I. Audit Committee

The Audit Committee's purpose is to assist the Board of Directors in overseeing the financial statements, as well as in monitoring compliance with the policies, processes, procedures and regulations

established by Grupo Supervielle and its controlled and affiliated companies.

The Audit Committee is a non-executive body and is governed by the provisions set forth in the bylaws, its Internal Regulations and the applicable legislation, specifically the LMC, the CNV regulations, the rules of the U.S. Securities and Exchange Commission (hereinafter, "SEC"), the NYSE corporate governance standards, the resolutions of the SSN, the standards of the Buenos Aires Stock Exchange, the Minimum Internal Control Standards issued by the BCRA and the resolutions of the UIF, among other regulatory bodies.

II. Risk Management Committee

The Risk Management Committee is responsible, among other functions, for providing institutional oversight of the strategies and policies for managing credit, market, interest rate, liquidity, operational and any other risks that may affect Grupo Supervielle and its subsidiary companies. In addition, it is tasked with defining Grupo Supervielle's consolidated risk appetite and risk tolerance levels, as well as approving and monitoring the threshold and limit framework for risk management.

The Committee is also responsible for assessing capital adequacy in relation to the risk profile, reviewing the Annual Internal Capital Adequacy Assessment Report (hereinafter, "IAC"), and defining the policy and methodological framework for stress testing within Grupo Supervielle's risk management framework.

III. Ethics, Compliance and Corporate Governance Committee

The Ethics, Compliance & Corporate Governance Committee oversees institutional integrity, promotes a culture grounded in ethical principles, and ensures transparency in decision-making. It establishes guidelines, assesses conduct risks, fosters sound compliance practices,

and monitors and oversees key policies, ensuring that the group's operations are conducted responsibly, fairly, and in accordance with the highest corporate governance standards. The Committee also assists the Board of Directors in overseeing the ethics and compliance program in all its aspects, as well as sustainability-related matters.

IV. Nomination and Remuneration Committee

The Nominations and Remuneration Committee's purpose is to assist the Board of Directors in matters relating to: the nomination of Directors and members of Senior Management and succession planning; the remuneration policy for the Board of Directors, members of Senior Management and personnel in general; and human resources policies, as well as employee training and performance evaluation (including incentive schemes and variable remuneration arrangements).

V. Disclosure Committee

The Disclosure Committee's purpose is to ensure timely, accurate and transparent control of Grupo Supervielle's relevant information, as well as that of its affiliated companies, which must be disclosed to the holders of the Company's securities and to the markets on which such securities are listed.

VI. Cybersecurity Committee

The Cybersecurity Committee's primary objectives are to assess and implement the policies proposed in relation to information security, and in particular cybersecurity, including the definition of risk appetite and the information security risk map. In addition, it is responsible for ensuring compliance with such policies, including the contingency plan in response to cybersecurity events.

VII. Committee for the Analysis of Operations with Related Parties

The Committee for the Analysis of Operations with Related Parties is a body of Grupo Supervielle with advisory and oversight powers, responsible for reviewing transactions with related parties as defined in the Policy on the Approval of Transactions with Related Parties, Connected Counterparties and Affiliated Persons, and for ensuring that such transactions are carried out under the conditions required by applicable regulations and in a transparent manner.

Supervisory Committee

The Supervisory Committee's purpose is to oversee and supervise the legality of the management of the Company.

The regular and alternate syndics are appointed by the Ordinary Shareholders' Meeting for a term of one year and may be re-elected. Alternate syndics act as regular syndic in the event of the temporary or permanent absence of the regular syndic.

Our Senior Management

Senior Management is composed of the CEO and those executives who have

decision-making authority and report directly to the CEO or to the Chair of the Board of Directors. Members of Senior Management must have the suitability and experience required to manage the business areas under their supervision, as well as appropriate oversight of personnel across the different areas.

Senior Management's primary function is to implement the policies, procedures, processes and controls necessary to manage operations and risks in a prudent manner, comply with the strategic objectives set by the Board of Directors, and ensure that the Board receives relevant, complete and timely information enabling it to assess management performance and determine whether the responsibilities it assigns are being effectively fulfilled. Without prejudice to the executive functions performed by the CEOs of the Bank and IOL, the Chairman and CEO of Grupo Supervielle plays a primarily institutional, strategic and corporate governance role, leading the vision, coordination and integration of the group as a whole.

4. OUR ETHICS, INTEGRITY AND COMPLIANCE PRINCIPLES

Integrity Program for the Prevention of Corruption

At Grupo Supervielle, we are committed to fostering a culture of integrity that promotes strict compliance with applicable laws, regulations, internal codes and best practices within the industry. The group requires honesty and transparency from its employees in their interactions with Public

Administration, in order to prevent any act that could be construed as bribery, influence peddling or any form of corruption, establishing zero tolerance for such behaviors.

The Integrity Program consists of a set of actions, mechanisms and internal procedures for the promotion of integrity, oversight and control, aimed at preventing, detecting and remedying irregularities and preventing punishable conduct covered by

the Program. The core pillars of our Integrity Program are our Code of Ethics, our Ethics & Values Hotline, and the training and communications carried out within the framework of our Integrity Culture.

The Integrity Program is comprised of the following elements:

- Policies that establish guidelines in this regard, such as the Code of Ethics, the Gifts and Client Business Travel Policy, the Donations Policy and the Procurement Policy.
- Guidelines for conduct in interactions with third parties and with the Public Sector.

Code of Ethics

At Grupo Supervielle, we have a Code of Ethics that establishes ethical guidelines to be followed by directors, officers and employees. The Code is based on a set of core values that identify Grupo Supervielle and that its members must uphold in their day-to-day conduct with customers, suppliers, employees and regulatory authorities.

Ethics Line

Our Ethics Line is an anonymous and independent information service designed to report any irregular conduct that may affect our interests. It aims to channel information related to behaviors that are inconsistent with the group's corporate values, while ensuring the independence, confidentiality and anonymity of the individuals who choose to use it.

- Specific rules and procedures to prevent unlawful acts in the context of tenders and bidding processes, in the performance of administrative contracts or in any other interaction with the Public Sector, as well as due diligence on third-party intermediaries.
- Employee training.
- Internal investigations.
- The Ethics Hotline as a reporting channel.
- Accounting controls.
- Statements of adherence by third-party intermediaries.

The Code of Ethics is structured around three pillars: (i) Values, (ii) Ethical Principles and Standards of Conduct that guide the conduct of all employees, and (iii) the Ethics & Values Line, through which employees and suppliers may anonymously report potential irregularities or improper conduct.

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Username: Supervielle

Password: Supervielle

Sustainability Report

Since 2011, we have prepared an annual Sustainability Report based on international standards (hereinafter, the “Global Reporting Initiative”) to present the economic, social and environmental performance of the companies that comprise the group. The report includes the sector supplement for the financial sector and seeks to reflect our contribution to the United Nations Sustainable Development Goals.

Subsequently, in our 2021 Sustainability Report, we began to disclose additional metrics in accordance with the criteria defined by the Sustainability Accounting Standards Board (hereinafter, “SASB”).

As of fiscal year 2022, Grupo Supervielle prepares an Integrated Report, with the aim of reflecting how the organization’s strategy, governance, performance results and outlook contribute to value creation in the short, medium and long term. The Report follows the guidelines of the International Framework of the International Integrated Reporting Council (hereinafter, “IIRC”) and the GRI 2021 Standards of the Global Reporting Initiative. In addition, it incorporates the contents of the GRI G4 Financial Services Sector Supplement, as well as the metrics and criteria of the Sustainability Accounting Standards Board (SASB), or follows the International Framework, aligned with the objectives and targets of the 2030 Agenda promoted by the United Nations. Through this approach, we manage the various capitals that make up the inventory of value created by our organization, for the benefit of both Grupo Supervielle and its stakeholders, including the communities in which we operate.

We align our vision with the expectations and needs of our stakeholders. This agenda

is integrated into the corporate strategy as a key driver of competitiveness, operational efficiency, risk mitigation and sustainable economic value creation.

Double materiality analysis has become a key process for identifying such expectations and for developing action plans, objectives and strategies that promote sustainable development across the group. Set forth below are some of the material topics on which we report:

Economic: ethics and transparency standards; profitability and economic sustainability; customer commitment; market positioning of our value proposition; generation of economic value in the operating environment; financial inclusion of underserved groups.

Social: quality employment; education and training of our people; diversity and equal opportunities; gender equity; combating discrimination; management of labor and union relations; ability to manage employee health and safety; strong community relationships; value chain management; human rights assessments; development of products and services designed to provide social benefits.

Environmental: resource optimization; energy management, carbon footprint measurement, waste management; and credit assessment policies and procedures incorporating environmental and social criteria.

Stakeholder involvement

At Grupo Supervielle, we maintain an open and transparent relationship with our stakeholders in order to understand their expectations and concerns and translate them into information of strategic value for business management. Engagement with a broad range of stakeholders allows us to clearly identify our stakeholders and

categorize them based on their level of influence, impact, risk, size, proximity, among other factors.

The objective is to gain a better understanding of the social and environmental impacts of our business activities, including indirect impacts arising from the projects and businesses we finance. This contributes to risk mitigation, crisis anticipation and should such situations arise, provides tools to address them efficiently.

Investor Relations

At Grupo Supervielle, we continuously promote engagement with investors. In order to reflect the Company's intrinsic value, the Board of Directors has explicitly established an active investor relations policy. To achieve this objective, the Company seeks to provide truthful, reliable and consistent information. Accordingly, various actions are carried out to foster fluid communication with investors. In its engagement with shareholders, our teams follow the same principles defined for all stakeholders: (i) easy accessibility; (ii) timely response to legitimate concerns; (iii) transparency regarding commitments undertaken; and (iv) disclosure of relevant information.

Communication channels with shareholders are also designed to allow for the receipt, analysis and timely response to inquiries. These communication channels complement the public information available to stakeholders through the Company's website.

The communication channels with the market, shareholders and analysts include: (i) the Annual Report and Integrated Report, the annual report filed with the U.S. Securities and Exchange Commission, quarterly financial statements, quarterly press releases, quarterly earnings

conference calls, meetings and calls with investors and analysts, and the public website

<https://www.gruposupervielle.com/English/home/default.aspx>, available in Spanish and English; and (ii) Grupo Supervielle's public website, which serves as the primary channel for accessing detailed information about the Company and the contact details of the Investor Relations team.