

SUPERVIELLE



Corporate Governance Code of Banco Supervielle S.A.

Updated November 3, 2021

Corporate Governance Notion

Corporate governance is the set of practices, processes, and structures by which companies are directed and controlled. Under this management system, the best corporate governance practices are linked to actions aimed at transparency and respect for shareholders, as well as tasks related to corporate responsibility, seeking to integrate economic-financial, social, and environmental aspects.

In general terms, good corporate governance practices facilitate the creation of an environment of trust and transparency that seeks to favor long-term investment, financial stability, and business integrity. That is why the adoption of these practices optimizes the relationship with investors, while at the same time encourages the members of the management to make decisions in line with the interests of the company and its shareholders. The company's positive perception in the market is thus consolidated, resulting in the creation of value for its shareholders and investors.

I. Applicable Rules

Banco Supervielle S.A. ("Banco Supervielle") is a corporation incorporated in the Argentine Republic and subject to the Companies Law No. 19,550 and the Financial and Exchange Institutions Law No. 21,526, as supplemented and amended. It is a company regulated and supervised by the Central Bank of Argentina ("BCRA") within the framework of the regulations established by such body.

In addition, as it is admitted to the public offering regime, it is subject to the regulations issued by the Argentine Securities and Exchange Commission ("CNV"), in particular, the provisions of the Consolidated Text of CNV Regulations (the "CNV Rules").

II. Corporate Governance Practices

Banco Supervielle adheres to the recommendations, guidelines, and best practices in the matter contained in Communications A 5201 and A 7100 of the Central Bank of Argentina and their supplementary and amending rules, as well as those established by the CNV Rules.

This Code establishes guidelines for the actions of the entire organization, particularly its Board of Directors and Senior Management, regarding compliance with its corporate purpose, including its relationship with shareholders, investors, suppliers, and stakeholders.

It is the responsibility of the Board of Directors of Banco Supervielle to ensure compliance with this Code and with the policies, procedures, and regulations derived therefrom.

III. Objective

The purpose of this Code is to formalize and disclose the conduct guidelines and corporate governance practices of Banco Supervielle, which are based on strict standards of full disclosure, efficiency, control, ethics, investor protection, equal treatment among investors, and corporate transparency, in order to create and preserve value for the entity, its shareholders, clients, employees, and the public in general.

IV. Corporate Governance Structure

5.1. Shareholders' Meeting

The Shareholders' Meeting is the forum where shareholders periodically meet to adopt resolutions that, in accordance with the law and the by-laws of Banco Supervielle, fall within their competence. The Shareholders' Meeting may be ordinary or extraordinary, depending on the matters to be addressed in accordance with applicable regulations.

Pursuant to Companies Law No. 19,550 and its supplementary and amending rules, the CNV Rules, and the by-laws of Banco Supervielle, an annual ordinary general meeting must be held within four months from the end of the fiscal year.

Likewise, an ordinary or extraordinary shareholders' meeting must be convened whenever deemed necessary by the Board of Directors, the Supervisory Committee, or when requested by shareholders representing at least five percent (5%) of the share capital of Banco Supervielle.

Banco Supervielle shall make available to the shareholders, within the timeframe provided by the regulations governing the matter, all relevant information regarding the holding of the Shareholders' Meeting.

The presence of directors, representatives of the Supervisory Committee, the CEO, the internal auditor, and the external auditor is encouraged at the Shareholders' Meetings.

5.1.1. Control Market

Banco Supervielle adheres to the optional statutory regime of mandatory public tender offers provided for in the Capital Markets Law.

5.1.2. Participation of Minority shareholders at Shareholders' Meetings

Banco Supervielle highlights the importance of active participation of minority shareholders in its Shareholders' Meetings and is committed to ensuring the protection of their rights. Therefore, there are no restrictions of any kind that may limit their participation.

5.1.3. Dividend Policy

The distribution of profits of financial institutions is regulated by the provisions of the Consolidated Text on Profit Distribution in accordance with BCRA Communication A 7181.

The declaration and payment of dividends, provided that legally available funds exist, shall be determined by the shareholders at the ordinary general meeting.

It is the responsibility of the Board of Directors to make a recommendation to shareholders regarding the amount of dividends to be distributed, which will depend on several factors including, but not limited to, operating results, cash flows, financial condition, capital levels, legal, contractual, and regulatory requirements, and investment and acquisition opportunities.

As a rule, the Board of Directors will favor an efficient use of capital in its recommendation process. That is, the Board will recommend reinvesting profits when there are organic or inorganic investment opportunities or recommend distributing dividends when there is excess capital.

Pursuant to the Companies Law No. 19,550, the CNV Rules, their supplementary and amending rules, and the by-laws of Banco Supervielle, at the end of each fiscal year, the net realized profits shall be allocated in the following order of priority:

- i. 5% until reaching 20% of subscribed capital, to the legal reserve fund.
- ii. to the remuneration of the Board of Directors and the Supervisory Committee.
- iii. to the payment of preferred share dividends, with priority to unpaid cumulative dividends; and
- iv. the remainder, in whole or in part, to additional participation of preferred shares and to dividends of common shares, or to optional or contingency reserves, carry-forward, or any other purpose determined by the Shareholders' Meeting.

According to the CNV Rules, cash dividends must be paid to shareholders within 30 calendar days from the approval of their distribution by the respective meeting. In the case of stock dividends, or stock and cash dividends jointly, the shares and the cash must be made available to shareholders within three months from the date of the notice of the public offering authorization corresponding to the shares to be distributed.

Shareholders are entitled to receive dividends and other credits, if any. Dividends are distributed on a pro rata basis according to the number of shares held.

The right of shareholders to claim the payment of dividends expires three years from the date they were made available, with the unclaimed amount being considered extraordinary income of the Company after such period.

5.2. Board of Directors. Functions

The Board of Directors exercises the strategic leadership of Banco Supervielle.

Its function is to manage the business of Banco Supervielle and approve the Company's general policies and strategies. In addition, it is responsible for approving and supervising the implementation of this Code, for promoting and reviewing the Company's overall business and risk policies and strategies, and for ensuring that management levels implement the necessary actions to identify, monitor, and mitigate the risks assumed.

In particular, the Board of Directors is responsible for approving:

- a. The strategic or business plan, as well as management objectives and annual budgets.
- b. The Investment and Financing Policy.
- c. The Code of Corporate Governance
- d. The Integrity Plan and related policies.
- e. The Corporate Social Responsibility Policy.
- f. The Risk Appetite, Control, and Comprehensive Risk Management Policies, and any other policy aimed at the periodic monitoring of internal information and control systems.
- g. Development of on-going training programs for directors and member of the senior management.
- h. Personnel incentive policies, considering the risks associated with the implementation of such policies.
- i. The succession plan, preparation of the talent map, identification of risk areas (positions and individuals) to be covered, and the most suitable successors for each case, considering equal

opportunities and non-discrimination by gender.

- j. Personnel selection policies that promote inclusive and diverse work environments in terms of gender, geographic origin, age, ethnic background, professional experience, family composition, and caregiving responsibilities, both for the appointment of Senior Management and for other employees.
- k. Education and training policies to provide employees with tools that enable them to develop their potential, removing obstacles that women may perceive regarding entry, participation, promotion, compensation, and recognition within the Company, including gender and gender-violence policies.

The strategic objectives of the entity are defined by the Board of Directors and approved in the meetings held for such purposes. These are objectives whose guidelines go beyond short-term circumstances and are included in the Risk Appetite document.

Once approved by the Board of Directors, the strategic objectives are communicated to Senior Management for implementation and monitoring and are reported to all management levels of the entity regarding their scope and targets, to commit and align employees with them.

It is Banco Supervielle's policy to carry out an annual strategic planning process that includes the development of its future business direction both globally and for each of its business lines.

This process consists of two main phases:

1. Review of risk appetite levels and key strategic objectives to be incorporated into the budget and business plan. This includes the estimation of income, expenses, and capital needs for the business areas over the next two years, also considering macroeconomic expectations and the regulatory framework. This phase begins with the strategic guidelines defined by the Board of Directors. Based on these guidelines, the proposal is developed and discussed by Senior Management and subsequently submitted for approval by the Board of Directors.
2. Definition of specific business plan objectives, which arises from the strategic guidelines of the previous phase, includes a detailed monthly budget for the first year, while for the second year it has a higher level of aggregation and is prepared on a semi-annual basis. The detailed business plan is prepared with the participation of different areas of the entity:
 - a. Administration and Management Control prepares the plan and its budget, following the guidelines already mentioned, regulatory considerations, and interacting with all business and support areas of the entity.
 - b. Finance considers the various aspects related to financial planning.
 - c. Risk verifies compliance with risk appetite levels and, together with Finance and Administration, assesses the projections of regulatory and economic capital adequacy for the scenario set out in the business plan and for stress scenarios.
 - d. The General Management and all Corporate Managements, which make up Senior Management, conduct the final review of the budget and business plan, which are approved in the same manner as in the previous phase by the Board of Directors.

Therefore, the specific objectives set out in the business plan and budgets are aligned with the overall business and risk strategy established by the Board of Directors.

The process described is communicated at all levels of the organization, with the assignment of priorities, specific responsibilities, and project execution timelines, ensuring the achievement of the objectives pursued in a coordinated and systematic manner.

The Board of Directors may decide, if deemed appropriate, necessary, and/or legally applicable, to create and integrate an Executive Committee and/or other Board Committees, establishing their organizational models, functions, and limits of action, and issuing their internal regulations within the powers granted by the by-laws and the law. Each committee must have its own internal regulations, and the measures or resolutions adopted by these bodies must be periodically reported to the Board of Directors.

5.2.1. Composition of the Board of Directors

The Board of Directors is composed of the number of members determined by the Shareholders' Meeting of Banco Supervielle, within the limits set forth in the by-laws (minimum of 3 and maximum of 9 members), whose terms of office shall be two years.

The Shareholders' Meeting may appoint alternate directors in the same or a smaller number than regular members, for a term of one year, to constitute quorum when necessary.

Each year, one-half or the number closest to one-half of the Board of Directors shall be renewed. To maintain this proportion in cases of an increase or decrease in the number of directors, the Shareholders' Meeting is authorized to appoint directors for periods of less than two years. Directors may be re-elected.

To enhance debate and enrich decision-making with respect to strategies, policies, and risk-taking, Banco Supervielle values diversity in the composition of its entire organizational structure, including its governing bodies.

5.2.2. Executive Directors and Independence Criteria – Proportion

There must be a separation between executive and management functions. For the purposes of this section, executive functions shall be understood as those related to the implementation of policies set by the Board of Directors, such as the role of the General Manager and Corporate Managers. Management functions shall be understood as those inherent to the Board of Directors.

To determine the independence status of each director, the criteria established by BCRA regulations, where applicable, and the independence standards defined by the CNV Rules shall be used.

5.2.3. Appointment of Directors

Pursuant to the Companies Law No. 19,550, the appointment of Board members is the responsibility of the ordinary general meeting.

Banco Supervielle takes as a fundamental premise the commitment to non-discrimination, not only regarding the election of directors but also in any circumstance, whether internal or external. These behavioral guidelines are reflected in the Code of Ethics.

5.2.4. Chairman

The Chairman is the legal representative of the Company. The Chairman shall chair Board meetings (casting the deciding vote in the event of a tie) and Shareholders' Meetings.

The Chairman's duties include: (i) representing Banco Supervielle institutionally; (ii) preserving and disseminating the values established by shareholders with respect to Banco Supervielle; (iii) driving Banco Supervielle's strategic development activities and communicating strategic guidelines to the

organization; (iv) monitoring the business management of companies related to Banco Supervielle; (v) ensuring the effective functioning of the Board of Directors with the support of the Secretary of the Board and ensuring that its procedures and governance rules are respected; (vi) organizing the evaluation process of Board members; and (vii) organizing and coordinating an efficient distribution of tasks among the Board members.

In addition to the duties set forth in the by-laws and in this Corporate Governance Code, the Chairman shall have all those duties inherent to such position to run the Company.

5.2.5. Vice-Chairman

The Board of Directors shall elect from among its members a Vice Chairman, or, if deemed convenient, a First Vice Chairman and a Second Vice Chairman. The Vice Chairman, or the First Vice Chairman, shall replace the Chairman, and in turn the Second Vice Chairman shall replace the First Vice Chairman in cases of absence or incapacity.

5.2.6. Secretary of the Board of Directors

The Board of Directors shall appoint a Secretary, who need not be a Board member.

The Secretary shall assist the Chairman in the performance of duties and ensure the proper functioning of Board meetings and Shareholders' Meetings, particularly by: (i) periodically providing Board members and shareholders with the necessary information from Banco Supervielle executives or external advisors; (ii) supervising the proper registration of corporate documentation; (iii) assisting the Chairman in the preparation and compliance of the agenda for Board meetings and Shareholders' Meetings; (iv) distributing to the directors all relevant information regarding Board meetings and the documentation to be considered therein; (v) distributing to the shareholders all relevant information regarding Shareholders' Meetings and the documentation to be considered therein; (vi) duly recording in the minutes the proceedings of Board meetings; and (vii) keeping proper records of all Board working papers, presentations by Banco Supervielle executives, as well as by external advisors.

The Secretary of the Board shall, in all cases, ensure the formal and substantive legality of the Board's actions.

5.2.7. Duty of Confidentiality

Board members shall maintain confidentiality regarding the deliberations and decisions of the Board of Directors and Committees of which they are members, as well as all information accessed in the exercise of their duties, which shall be used exclusively in such capacity and safeguarded with due diligence. The duty of confidentiality shall remain even after leaving office.

5.2.8. Ethics and Rules of Conduct

Directors must behave ethically in their conduct, consistent with the regulatory requirements applicable to those who perform management duties in corporations, acting in good faith and in accordance with the principles that constitute Banco Supervielle's values.

5.2.9. Incompatibilities

In performing their duties, directors shall be subject to the incompatibilities established by applicable rules at all times, particularly those contained in the rules of the Central Bank of Argentina, the Companies Law, the by-laws, and this Code.

Directors may not hold, directly or indirectly, positions of any kind in companies or entities competing with Banco Supervielle, nor provide representation or advisory services in favor of such entities, unless previously approved by the Board of Directors of Banco Supervielle.

Directors may not hold political positions nor engage in any other activities that could negatively affect the image of Banco Supervielle and/or any of its related companies.

5.2.10. Termination of Directors

Directors shall cease to hold office when their term has expired, unless they are re-elected.

Directors must tender their resignation in the following cases:

- a. When they incur any of the incompatibility or prohibition situations set forth by applicable regulations, the by-laws, or this Code.
- b. When there are significant changes in their professional situation or in the capacity under which they were appointed.
- c. In case of non-compliance with their obligations in the performance of their functions as directors.
- d. When, due to actions attributable to the director in such capacity, serious damage has been caused to the company's assets or the required commercial and professional integrity to hold the position of director of Banco Supervielle has been lost.
- e. When their continued presence on the Board could affect the credit or reputation of Banco Supervielle in the market or otherwise jeopardize its interests.

5.2.11. Training and Development

The Nominations and Compensation Committee of Grupo Supervielle (the controlling company of Banco Supervielle) designs and implements an annual training program for directors and approves training and development programs for senior executives.

5.2.12. Evaluation of the Board's Performance

The Shareholders' Meeting of Banco Supervielle annually considers the management and performance of the Board of Directors when addressing the matters contemplated in Article 234, items 1 and 2, of Companies Law No. 19,550, and related supplementary and amending rules.

The Board of Directors shall evaluate the performance of each of its members and prepare an annual report on the matter. The Board shall prepare regulations establishing evaluation guidelines and criteria. It may hire the services of an external consultant to collaborate in the evaluation process of its members. The Board shall also evaluate the performance of its Committees and prepare the corresponding report.

5.2.13. Remuneration of Directors

The Shareholders' Meeting sets the directors' remuneration according to reasonable criteria, based on the results obtained during their management, considering the provisions of the Companies Law No. 19,550, its amendments and supplementary rules, the by-laws, and the CNV Rules.

5.2.14. Liability Coverage

Banco Supervielle shall ensure, through a civil liability insurance policy contracted with an insurance company, the responsibilities that directors may incur in the performance of their duties. Said policy must provide advance coverage for all expenses (including legal assistance), bonds, and benefits that may arise from any civil, criminal, or administrative proceedings brought against directors of Banco Supervielle, and its coverage shall remain in force even after the director has ceased to hold office, for the period established by applicable law.

5.3. Board Committees

5.3.1. Audit Committee

The Audit Committee assists the Board of Directors in supervising the financial statements, monitoring compliance with policies, processes, procedures, and regulations established for each of the Bank's business areas and evaluating and approving corrective measures proposed by the head of each audited area under the supervision of General Management. It is governed by the guidelines contained in the Minimum Internal Control Standards for Financial Institutions (consolidated text of BCRA Communication A 6552).

5.3.2. Risk Management Committee

The Risk Management Committee is responsible, among other functions, for addressing strategies and policies for managing credit, market, interest rate, liquidity, operational, and any other risks that may affect Banco Supervielle and its subsidiaries. It must also define Banco Supervielle's risk appetite and tolerance levels, approve and monitor thresholds and limits for risk management, assess capital adequacy in relation to the risk profile, address the Annual Internal Capital Adequacy Assessment Report (IAC by its acronym in Spanish), and define the policy and methodological framework for stress testing within Banco Supervielle's comprehensive risk management.

5.3.3. Information Technology Committee

The Information Technology Committee assists the Board of Directors in evaluating and monitoring the IT governance model, the Strategic Systems Plan, approval of the Systems Contingency Plan, analysis of IT policies in the short, medium, and long term, as well as application systems, databases, and equipment. It also plans and coordinates compliance with the policies and objectives of the information systems area established by the Board. In addition, it must perform all functions established by BCRA rules and other applicable provisions.

5.3.4. Anti-Money Laundering and Counter-Terrorist Financing Committee

The Anti-Money Laundering and Counter-Terrorist Financing Committee is responsible for ensuring compliance with current regulations on the prevention of money laundering and terrorist financing, to ensure that Banco Supervielle maintains an adequate level of compliance in line with best practices in the field.

5.3.5. Senior Credit Committee

The Senior Credit Committee is responsible for the credit decision-making process within the external and internal regulatory frameworks, and the policies and powers delegated to it by the Board of Directors.

5.3.6. Nominations and Remuneration Committee

The Remuneration and Nominations Committee is a body of Grupo Supervielle, applicable to Banco Supervielle in its capacity as a controlled company. It assists the Board of Directors with respect to nomination of Directors and Senior Management members and succession plans; compensation policy for the Board, Senior Management, and staff in general; and human resources policies, training, and performance evaluation (including incentive schemes and variable compensation).

5.3.7. Ethics, Compliance and Corporate Governance Committee

The Ethics, Compliance and Corporate Governance Committee is a body of Grupo Supervielle, applicable to Banco Supervielle in its capacity as a controlled company. Its purpose is to assist the Board of Directors in adopting best practices of good corporate governance aimed at maximizing the growth capacity of Grupo Supervielle and its related companies, while preventing value destruction. It also assists the Board in supervising its ethics and compliance program in all aspects.

5.3.8. Disclosure Committee

The Disclosure Committee is a body of Grupo Supervielle, applicable to Banco Supervielle in its capacity as a controlled company. Its purpose is to ensure the timely, high-quality, and transparent disclosure of relevant information of Grupo Supervielle S.A. and its related companies, which must be disclosed to the holders of the Company's securities and to the markets where such securities are listed.

5.3.9. Related Party Transactions Committee

The Related Party Transactions Committee is a body of Grupo Supervielle, applicable to Banco Supervielle in its capacity as a controlled company, with advisory and supervisory powers. It evaluates related party transactions as defined in the Policy on Approval of Related Party Transactions, Connected Counterparties, and Related Persons, and ensures that such transactions are carried out under the conditions required by applicable regulations and in a transparent manner.

5.3.10. Cybersecurity Committee

The Cybersecurity Committee is a body of Grupo Supervielle, applicable to Banco Supervielle in its capacity as a controlled company. Its main objectives are to evaluate and implement proposed policies in the field of information security, particularly cybersecurity, including risk appetite definitions and the information security risk map. In addition, it must ensure compliance with such policies, including the contingency plan in the event of cybersecurity incidents.

5.4. Management Committees

5.4.1. Executive Committee

The Board of Directors may authorize the creation of an Executive Committee, whose responsibilities, functions, composition, and operating procedures must be governed by Internal Regulations.

5.4.2. ALCO (Asset and Liability Committee)

Its main objectives and functions include, among others, monitoring financial risks such as market, liquidity, interest rate, maturity mismatch, foreign currency, and liability concentration risks; and making recommendations on asset and liability management strategies to the Comprehensive Risk

Committee. It also defines and controls asset and liability interest rates and pricing policies and reviews and sets hedging policies to mitigate market risk and protect the entity's assets.

5.4.4. Operational Risk Committee

Its main functions include ensuring compliance with operational and technological risk policies established by the Board of Directors, monitoring the management of operational and technological risks, detecting potential deviations in planned evaluation processes, implementing mitigation plans, and monitoring key risk indicators (KRIs), while formulating appropriate recommendations.

5.5. Senior Management

Senior Management is responsible for the ordinary management of business activities.

The functions and responsibilities of Senior Management are established by the Board of Directors through the definition of corporate strategies. Without prejudice to the foregoing, Senior Management shall:

- i. Implement the strategies and objectives established by the Board of Directors.
- ii. Develop processes to identify, assess, control, monitor, and mitigate the risks incurred by the entity.
- iii. Assign responsibilities and monitor compliance.
- iv. Implement appropriate internal control systems and report to the Board on the achievement of objectives.
- v. Use reports generated by internal and external audits to assess management performance.

The purposes and responsibilities of Senior Management are described in the entity's Functions Manual and are complemented by specific policies and procedures applicable to each relevant area.

V. Integrity Program

Grupo Supervielle and its subsidiaries, including Banco Supervielle, have an Integrity Program for the Prevention of Corruption, which promotes honesty and transparency in their relationship with the Public Administration to prevent any act that may be considered bribery, influence peddling, or any form of corruption, establishing zero tolerance for such behavior.

The Integrity Program is composed of the following elements:

- Policies that establish guidelines in this regard, such as the Code of Ethics, the Client Gifts and Business Travel Policy, the Donations Policy, and the Procurement Policy.
- Guidelines for interaction with third parties and with the Public Sector.
- Specific rules and procedures to prevent unlawful acts in the context of tenders and bidding processes, in the execution of administrative contracts, or in any other interaction with the Public Sector, including due diligence of third-party intermediaries.
- Staff training.
- Internal investigations.
- Ethics Line as a channel for complaints. Accounting controls.
- Manifestation of adhesion by third-party intermediaries.

6.1. Code of Ethics

Banco Supervielle adheres to the Code of Ethics of Grupo Supervielle, based on the need to establish the main guidelines for the professional, moral, and work performance conduct of its employees within the Company.

It applies to all employees of Banco Supervielle, including all dependents, fixed-term employees or those in probationary periods, members of the Board of Directors, external advisors, suppliers, and any third party who, by virtue of their relationship with Banco Supervielle, may affect the reputation of the Company or any of its subsidiaries.

6.2. Ethics Hotline

The Ethics Hotline is an anonymous and independent information service for reporting any irregularities that affect the interests of Grupo Supervielle and its subsidiaries. Its purpose is to channel information related to behaviors inconsistent with corporate values, guaranteeing independence, confidentiality, and anonymity of those who decide to use it.

Phone: 0800-777-7813

Website: <https://eticagruposupervielle.lineaseticas.com/>

Username: Supervielle

Password: supervielle

6.3. Policy on Communication with Investors, Confidentiality and use of Privileged Information

The Policy on Communication with Investors, Confidentiality and use of Privileged Information, approved by the Board of Directors, is designed to ensure that the Company and the staff of Grupo Supervielle and its subsidiaries comply with these requirements by establishing procedures and guidelines regarding:

- Daily handling of confidential information: protection of confidentiality is essential for the Company's operations and affairs. Equally important, securities laws expressly prohibit staff from disclosing material non-public information regarding the Company or any of its controlled entities (including, among others, family members, analysts, individual investors, and the investment community and the press), except in the ordinary course of business and always adopting measures to preserve confidentiality.
- Communication with all market participants: it is a basic principle of capital markets law that all investors must have equal access to information that may affect their investment decisions. The Company is committed to an effective communication and disclosure policy for the benefit of all stakeholders, including shareholders, suppliers, customers, government authorities, employees, and market participants, consistent with all applicable laws, rules, and regulations.
- Restriction on securities trading by staff: no staff member may trade in Company securities and/or securities of other issuers with respect to which they may possess material non-public information regarding the Company and/or its controlled entities.

6.4. Policy on the Approval of Transactions with Related Parties

The Policy on the Approval of Transactions with Related Parties aims to define the general guidelines applicable to related party transactions, ensuring they are carried out with transparency, fairness, and impartiality, duly reflected in the financial statements, and performed under good corporate governance practices, consistent with organizational principles and values, the Corporate Governance Code, and other Board policies.

6.5. Conflict of Interest Policy

The Conflict-of-Interest Policy, approved by the Board of Directors, defines the framework for preventing and managing conflict of interest situations in order to avoid or limit their negative impacts on the interests of Grupo Supervielle.

The Policy applies to Grupo Supervielle and its related companies and is addressed to all members of the Board of Directors, the Supervisory Committee, Senior Management, and all employees under any type of contract (the “Covered Persons”).

A conflict arises when the private interests of the Covered Persons conflict or interfere in any way with the interests of the Company. The main risk of a conflict of interest is that it may hinder decision-making or interfere with the performance of work in an efficient and objective manner. Covered Persons have the obligation to act honestly and ethically and in favor of the Company’s interests, avoiding situations that present a real or potential conflict between their private interests and those of the Company.

6.6. Business Gifts and Entertainment Policy

Grupo Supervielle and its subsidiaries are committed to fostering a culture of integrity that promotes strict compliance with laws, regulations, internal codes, and industry’s best practices. In this regard, they condemn corruption both in relationships with the public administration and in private spheres, establishing zero tolerance for such behavior.

The Business Gifts and Entertainment Policy prohibits behaviors that may be interpreted as contrary to this culture of integrity.

6.7. Purchasing Policy

Grupo Supervielle has a Purchasing Policy applicable to Banco Supervielle in its capacity as a controlled company. Its objective is to define the guidelines under which the procurement of goods and services must be carried out, to ensure objectivity, transparency, and optimization of the process.

VI. Other Provisions

7.1. Risk Management and Financing

The investment and financing policy is the responsibility of the Board of Directors of Banco Supervielle and is considered a sensitive aspect of the Company’s daily and long-term management.

7.2. Capital Planning

Banco Supervielle has a capital planning process that allows it to project regulatory and economic

capital needs based on the strategic objectives set forth in the business plan and its risk appetite policy. This is described in the Capital Self-Assessment Report (IAC), which ensures that the Bank has the necessary capital based on the risk profile of its business model and that such capital is sufficient to withstand adverse scenarios that, although unlikely, are possible.

Banco Supervielle has quantitative metrics established in the Risk Appetite Statement, which allow it to periodically monitor the above.

7.3. Internal Control

It is Banco Supervielle's policy to promote ethical standards in business management and to ensure compliance with internal policies and applicable regulations, maintaining adequate risk management.

The Board of Directors, Senior Management, officers, and all members of the organization are responsible for compliance with established internal controls and standards.

The Board of Directors has formalized an organizational structure designed to strengthen the integrity of the compliance environment, through continuous comprehensive management of operational, market, interest rate, liquidity, credit, IT, fraud, and money laundering risks, via different committees, as well as monitoring by the Compliance Department and identification and assessment of compliance by the Internal Audit Department.

Banco Supervielle's Board of Directors has established policies and procedures that ensure an adequate level of internal control and mitigation of all risks inherent in its activity, in compliance with BCRA regulations and best banking practices. Banco Supervielle has implemented internal controls over the following processes:

- (i) Approval of expenses, contracts, and payments to ensure due authorization at the time of invoice receipt and at the time of payment through check or bank transfer.
- (ii) Monthly budgetary control of all expenses incurred during the month and year-to-date, reviewing any deviation or unforeseen expense.
- (iii) Controls over financial transfers, with different signature levels and requiring two signatures in all cases of third-party transfers.
- (iv) Periodic procedures for bank reconciliations, expense allocation, and posting of journal entries, aimed at achieving an error-free balance sheet closing.
- (v) Quarterly issuance of individual and consolidated financial statements, subject to review by the external auditor.

7.4. Internal Audit Department

Banco Supervielle has a Corporate Internal Audit Department, directly responsible for evaluating Banco Supervielle's internal control, establishing general audit policies for the entity, monitoring compliance, and providing support to ensure an adequate internal control system.

7.5. Transparency and Public Information

Banco Supervielle adheres to the highest standards of transparency in the public offering context, in line with the Transparency Regime of the Capital Markets Law and the applicable regulations of the Central Bank of Argentina.

7.6 Investor Information and Inquiries

Banco Supervielle follows a transparency policy that promotes broad and immediate dissemination of financial information to investors and shareholders through a dedicated section on its website: www.supervielle.com.ar

Banco Supervielle addresses the concerns and inquiries of shareholders through the Investor Relations area, whose purpose is to create and maintain relationships with investors and shareholders.

7.7. Internet Communication

Banco Supervielle maintains a freely accessible website (www.supervielle.com.ar) that provides updated, user-friendly information and includes a section for user inquiries.

The website regularly publishes corporate and financial information about Banco Supervielle and complies with confidentiality and integrity standards for electronically transmitted information.

7.8. Commitment to the environment. Sustainability Report

Grupo Supervielle and its controlled companies, including Banco Supervielle, are committed to developing environmental and corporate social responsibility policies, undertaking actions aimed at the direct and indirect protection of the environment and the social, economic, and cultural development of the communities in which they operate.

To communicate with stakeholders, Grupo Supervielle periodically issues a Sustainability Report, prepared in accordance with international best practices and duly audited by an independent third party.

The Sustainability Report is based on Grupo Supervielle's values: leadership, innovation, simplicity, efficiency, commitment, and respect. These values give the organization its identity and guide how it interacts with clients, suppliers, employees, and peers.

The analysis of materiality is a key process for identifying expectations and developing action plans, objectives, and strategies that promote sustainable development. Some of the material topics reported include:

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

Social: quality employment; education and training; diversity and equal opportunities; gender equity; anti-discrimination; labor and union relations management; employee health and safety; community relations; supply chain management; human rights assessment; development of socially beneficial products and services.

Environmental: resource optimization; management and reduction of waste and effluents; credit evaluation policies and procedures with environmental and social criteria.

7.9. Gender, Diversity and Inclusion

Banco Supervielle promotes a culture of equality, eliminating any form of discrimination or inequity

based on age, gender, gender identity, disability, race, ethnicity, nationality, religion, or sexual orientation.

In addition, specific strategies and action plans are developed to identify and remove obstacles that women may face regarding entry, participation, promotion, compensation, and recognition within the Company.

7.10. Involvement of Stakeholders

Engagement with a wide range of stakeholders allows Banco Supervielle to clearly identify its stakeholders and classify them according to their level of influence, impact, risk, size, proximity, among others.

The objective is to better understand the social and environmental impacts of business activities, including indirect impacts derived from financed projects and businesses. This contributes to risk mitigation, crisis anticipation, and, in the event of crises, provides tools for efficient resolution.

Given the scale of its operations and stakeholder diversity, Banco Supervielle adopts a decentralized engagement approach. This means that different teams at Banco Supervielle must regularly interact with their stakeholders on matters of mutual interest, to explore potential partnerships and seek opportunities to create value.

In stakeholder engagement, Banco Supervielle teams follow the principles of easy accessibility; timely response to legitimate concerns; transparency regarding commitments; and disclosure of relevant information.

For stakeholder identification, the relevant teams rely on interaction and business impact criteria, categorize profiles, and design appropriate communication channels. These channels must allow timely reception, analysis, and response to inquiries and complement the public information accessible via the Company's website (www.supervielle.com.ar).

The Sustainability Report specifies the Company's stakeholders and the communication channels for their appropriate engagement.

7.11. Corporate Governance Report

Banco Supervielle annually includes in the Board of Directors' Annual Report a Corporate Governance Report detailing how it applies the recommendations of the Corporate Governance Code, in accordance with CNV Rules.