



Related Party  
Transactions of  
**Grupo Supervielle S.A**

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## 1. INTRODUCTION AND OBJECTIVE

Related companies usually carry out reciprocal transactions intended to reach common goals, such as scale economies and synergies, among other. These transactions generally originate the exchange of economic resources and legal, operative, administrative, financial, tax or accounting and control proceedings. In order to establish a framework for the interaction among companies, such transactions must be carried out with transparency.

The Policy on Related Party Transactions (the "Policy") is intended to define the general guidelines applicable to related party transactions so that said transactions are carried out with transparency, equity and fairness, are duly recorded in the

financial statements and are conducted according to good corporate governance practices, in line with corporate principles and values, the Corporate Governance Code and other policies issued by the Board of Directors.

This Policy is supplemental to securities laws, rules and regulations in connection with the disclosure and negotiation as well as the policies and procedures established in the other corporate governance documents of the Company. In particular, the Rules of the Audit Committee and the Code of Ethics provide additional information in respect of the procedures for review of disclosure, conduct and preparation of violation reports.

## 2. GOVERNANCE

The Board of Directors may amend this Policy and the procedures contemplated therein as deemed convenient to achieve the objectives of this Policy and applicable legal requirements.

## 3. SCOPE

The Policy applies to Grupo Supervielle S.A. and its controlled and related companies provided they are a related party of the issuer.

## 4. RELATED PARTIES

"Related Parties" shall mean:

- a) The directors, members of the Statutory Audit Committee, general managers or special managers appointed pursuant to section 270 of the Corporations Law No. 19.550.

- b) The individuals and legal persons with control or a significant<sup>1</sup> interest in the capital of the issuer or in the capital of its controlling company.
- c) Any other company under the common control by the same controlling company.
- d) Ascendants, descendants, spouses or siblings of any of the above mentioned individuals.
- e) The companies in which any of the aforementioned persons own either directly or indirectly a significant share.

In case of discrepancy between the provisions of the Policy and those of the Policy on Related Party Transactions of the subsidiaries Banco Supervielle S.A. and Cordial Compañía Financiera S.A., the latter shall prevail since they are financial entities to which the specific rules of Banco Central de la República Argentina apply.

## 5. PROCEDURE

- 5.1. A related party transaction shall be deemed to be a transfer of resources, services or obligations between an entity and its related party, for consideration or not.
- 5.2. Market conditions: those transactions carried out according to competitiveness, equity and transparency principles. Related party transactions shall follow the same principles and proceedings as arm's length transactions.
- 5.3. Relevant amount: the amount of transactions that, in a single contract or in successive contracts or contracts with the same purpose entered into in a term of one year, exceeds 1% of the Company's net worth pursuant to the latest approved balance sheet.
- 5.4. Related Party Transactions shall meet the following conditions:
  - a) They shall be conducted as arm's length transactions.
  - b) They shall be in writing, with specification of the main terms and conditions.
  - c) They must be clearly reported in the financial statements, according to the materiality criteria established by the accounting principles.
- 5.5. Related Party Transactions for a Relevant Amount shall be submitted to the Audit Committee, who shall issue a substantiated opinion and shall determine if the terms are reasonably adequate to normal and usual arm's length transactions. The substantiated opinion shall be issued within 5 (five) business days and shall be submitted to the Board of Directors for consideration.
- 5.6. If deemed necessary, the Board of Directors may request the opinion of 2 (two) independent assessment firms.
- 5.7. If the conditions of the transaction do not qualify as reasonably adequate to usual and normal market conditions according to the Audit Committee and independent

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<sup>1</sup> Definition of "Significant Interest": a person holding at least 15% of the capital stock or a smaller share when it is entitled to appoint one or more directors per class of shares or has entered into agreements with other shareholders regarding the governance and management of a company or its controlling company.

assessment firms, the transaction shall be submitted to the Shareholders' Meeting for approval.

- 5.8. If the conditions of the transaction qualify as reasonably adequate to usual and normal market conditions, the decision rendered by the Board of Directors shall be submitted to approval and entered in the minutes.
- 5.9. Related Party Transactions shall be clearly and accurately disclosed in the notes to the financial statements of the Company and as provided by the applicable regulations of the enforcement authorities.
- 5.10 In addition to the regulations set forth in this Policy, Related Parties shall observe the guidelines of the Code of Ethics and the Policy on Conflicts of Interest.