



Grupo Supervielle S.A.

**Integrity Program for the
Prevention of Corruption**

1. INTRODUCTION

Grupo Supervielle is committed to fostering a culture of integrity that promotes strict compliance with laws, regulations, internal codes, and good practices applicable to the sector. It demands honesty and transparency from its employees in their relationship with the Public Administration in order to prevent any act that could be understood as an act of bribery, influence

peddling or any form of corruption, establishing zero tolerance for this type of behavior.

This policy establishes an Integrity Program whose objective is to detect and avoid conduct contrary to the objectives and culture of Grupo Supervielle.

2. GOVERNANCE AND POLICY RESPONSIBLE

Grupo Supervielle Board of Directors will be the body in charge of reviewing and modifying this policy with the recommendations of the Ethics, Compliance and Corporate Governance Committee.

The Compliance Department will be in charge of interpretation, control and oversight of this policy and will be responsible for ensuring its effective

compliance. It will carry out periodic risk analysis for the consequent adaptation of the Integrity Program as well as the continuous monitoring and evaluation of its effectiveness.

The Head of Compliance is the internal person in charge of development, coordination, and oversight of the Integrity Program.

3. SCOPE

This policy applies to Grupo Supervielle and its related companies and the reference to Grupo Supervielle in this document will include each of its related companies.

Non-compliance will be dealt with in the Ethics, Compliance and Corporate Governance Committee.

4. PROHIBITED BEHAVIORS AND LIABILITY OF THE LEGAL PERSON

4.1. PROHIBITED BEHAVIORS

Grupo Supervielle S.A. prohibits the following conducts:

- Offering gifts to a public official to do, delay or stop doing something related to his/her duties.
- Offering gifts to a third party so that he /she may unduly assert his/her

influence before a public official, to do, delay or stop doing something related to his/her functions.

- Offering or granting to a public official of another State or of an international public organization, whether for his/her benefit or that of a third party, sums of money or any object of pecuniary value or other compensation, such as gifts, favors, promises or advantages, in exchange for said official carrying out or omitting to carry out an act related to the exercise of their public functions, or to enforce the influence derived from their position, in a matter related to a

transaction of an economic, financial or commercial nature.

- Accept requests for commissions, remuneration, gifts, benefits, or economic advantages that any of the aforementioned persons may make.
- Accept commissions, remuneration, gifts, benefits or economic advantages from third-party companies or suppliers in compensation for the contracting of products or services.
- Offer and accept any type of gift or benefit, which exceeds what is accepted by common, social, and courtesy uses and by internal policy.

4.2. CRIMINAL LIABILITY OF THE LEGAL PERSON. CRIMES

Law 27.401 on Criminal Liability of Legal Persons establishes the responsibility of the legal person for the following crimes against the public administration:

- Bribery and influence peddling, national and transnational, provided for by articles 258 and 258 bis of the Criminal Code.
- Negotiations incompatible with the exercise of public functions, provided for by article 265 of the Criminal Code.
- Crime of Concussion provided for by article 268 of the Criminal Code.

- Illicit enrichment of officials and employees provided for by articles 268 (1) and (2) of the Criminal Code.
- Aggravated false financial statements and reports provided for by article 300 bis of the Criminal Code.

In order to comply with these regulations, Grupo Supervielle develops the Integrity Program, established in Item 5, which consists of a set of actions, mechanisms and internal procedures aimed at preventing, detecting, and correcting irregularities and improper conduct.

The crimes established by this rule are the following:

4.2.1. Bribery and national and transnational influence peddling (articles 258 and 258 Bis of the Criminal Code)

The Criminal Code in its article 258 establishes a prison sentence (1 to 6 years) for those who directly or indirectly give or offer a gift to a public official or a third party so that he/she can unduly assert his/her influence before a public official, so that the

official does, delays or stops doing something related to his/her functions.

Article 258 bis - Transnational bribery - establishes that it will be punished with imprisonment (1 to 6 years) and special perpetual disqualification from exercising the public function the person who, directly or indirectly, offers or grants to a public official of another State or of an international public organization, either for their benefit or that of a third party, sums of money or any object of pecuniary value or other compensation, such as gifts, favors,

promises or advantages, in exchange for said official performing or omitting to perform an act related to the exercise of his/her public functions, or to assert the influence derived from his/her position, in a matter related to a transaction of an economic, financial or commercial nature.

Both the authority that requests or accepts the benefit and the one that grants it commit bribery. Although both are active subjects of the crime, it is called passive bribery in the case of the official who accepts the gift, and active bribery to the action of offering or delivering it.

4.2.2. Negotiations incompatible with the exercise of public functions

Article 265 of the Criminal Code provides that it will be punished with imprisonment from one to six years and special perpetual disqualification, the public official who is directly interested by an interposed person or by a simulated act, with a view to his/her

4.2.3. Crime of Concussion

Article 268 of the Criminal Code provides that the public official who converts the

4.2.4. Illicit enrichment of officials and employees

Article 268 (1) of the Criminal Code provides that the public official who for profit uses for himself/herself or for a third party, information, or data of a confidential nature that he/she has/her become aware of by his/her post.

Article 268 (2) provides that it will be punished with reclusion or imprisonment for two to six years, a fine of fifty percent to one hundred percent of the value of the

In the crime of bribery, the people who can request or receive gifts, favors, promises or advantages are public employees or civil servants. The crime can be committed directly or through third parties such as intermediaries, commercial agents, possible external advisers, etc.

Influence peddling punishes the payment of gifts to a person in order to influence the decision of a public official.

Both offenses require the active or passive participation of a public official. Its ultimate purpose is to manipulate the Administration's decisions so that they favor the company.

own benefit or that of a third party, in any contract or operation in which he /she intervenes by reason of his/her position.

This provision will be applicable to arbitrators, amicable mediator, experts, accountants, tutors, curators, executors, trustees, and liquidators, with respect to the functions performed as such.

Illegal exactions expressed in the previous articles to his/her own or third party benefit will be punished with two to six years' imprisonment and perpetual absolute disqualification.

enrichment and absolute perpetual disqualification, to the person who, when duly required, does not justify the origin of an appreciable patrimonial enrichment of theirs or of an interposed person to disguise it, occurred after the assumption of a public position or employment and up to two years after having ceased in their employment.

It will be understood that there was enrichment not only when the patrimony had been increased with money, things, or goods, but also when debts had been

canceled or obligations that affected it had been extinguished.

4.2.5. Financial Statements and false reports misrepresented in order to hide bribery and influence peddling, national and transnational. (art. 300 bis of the Criminal Code)

Article 300 (section 2) of the Criminal Code punishes with imprisonment from six months to two years the founder, director, administrator, liquidator or trustee of a corporation or cooperative or of another partnership, who knowingly publishes, certifies or authorizes an inventory, a balance sheet, a profit and loss account or the corresponding reports, minutes or annual reports, false or incomplete or informs the Board of Directors or shareholders' meetings, falsely, about important facts to assess the economic

The person interposed to conceal the enrichment will be punished with the same penalty as the perpetrator of the act.

situation of the company, whatever would have been the purpose pursued when verifying it.

A false balance sheet is that financial information that consciously does not adjust to the economic reality of the company, either by exaggerating or overvaluing the resources (assets) or undervaluing the debts and other obligations (liabilities), or by adulterating any other item in order to avoid taxes, to pretend a solvency that is lacking, or to dazzle potential investors who intend to acquire the company.

Executives must establish internal controls to minimize the risks of misrepresentation or fraudulent financial information release.

4.3. SANCTIONS

For legal persons to be held responsible for these crimes, it is necessary that they have been carried out, directly or indirectly, with their intervention or in their name, interest, or benefit. The legal person is also responsible if the person who has acted in the benefit or interest of them is a third party who lacks powers to act on their behalf, provided that the legal person has ratified their job, even if it was tacitly.

The legal person will be exempt from liability only if the human person who committed the crime has acted for his / her exclusive benefit and without generating any profit for that legal person.

The penalties applicable to legal persons are the following:

- A fine of two to five times the undue benefit obtained or that could have been obtained.

- Total or partial suspension of activities, which in no case may exceed ten years.
- Suspension to participate in tendering and public bidding for public works or services or in any other activity related to the government, which in no case may exceed ten years.
- Dissolution and cancellation of the legal entity status when it had been created for the sole purpose of committing the crime, or those acts constitute the main activity of the entity.
- Loss or suspension of any state benefits they may have.
- Publication of an extract of the conviction at the expense of the legal person.

These penalties may be graduated by the judges who will take into account (i) non-compliance with internal rules and procedures; (ii) the number and hierarchy of officials, employees, and collaborators

involved in the crime; (iii) the omission of vigilance over the activity of the authors and participants; (iv) the extent of the damage caused; (v) the amount of money involved in the commission of the crime; (vi) the size, nature and economic capacity of the legal entity; (vii) spontaneous reporting to the

authorities by the legal entity as a consequence of its own internal investigation or detection activity; (viii) subsequent behavior; (ix) the provision to mitigate or repair the damage and recidivism.

5. INTEGRITY PROGRAM - ELEMENTS

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 correcting irregularities and preventing conduct punishable by the aforementioned regulation.

The Program is made up of 4 elements: (i) Integrity Policies (ii) Guidelines for action against third parties, (iii) Training, (iv) Internal Investigations.

5.1. INTEGRITY POLICIES THAT PREVENT THE COMMISSION OF CRIMES AND MISCONDUCT

Grupo Supervielle has a set of policies and procedures applicable to all directors, managers, and employees, which guide the

execution of their tasks in order to prevent the commission of crimes.

5.1.1. Code of Ethics

The Code of Ethics establishes the ethical guidelines to be followed by directors, managers, and employees and a set of values that must be respected in daily activities with clients, suppliers, employees, and control bodies.

communities of interest, (iv) Respect for thinking about the other, listening and understanding the needs of clients and fostering constructive personal and business relationships, (v) Efficiency to add value and give quick and quality responses using available resources in a responsible and sustainable way, (vi) Simplicity to make life easier for customers by caring about their time, operating with solid and simple processes and making decisions close to them.

It is based on three pillars: Values; Ethical Principles and Standards of Conduct; and Ethics & Values Line.

The Values distinguish and identify Grupo Supervielle and must be respected by its members in their daily actions with stakeholders. Employees are required (i) Leadership to be benchmarks in the market, (ii) Innovation to challenge limits in search of new solutions for customers, (iii) Commitment to respond with sustainable solutions to customer demands and

The Ethical Principles and Standards of Conduct establish a framework of ethics and transparency for the construction of long-lasting and trusting relationships with stakeholders. They promote a culture of integrity and compliance with regulations and good practices in order to foster the development of a sustainable and competitive business context.

General Ethical Principles highlight: (i) promotion of equal opportunities and non-discrimination, (ii) provide a safe and healthy work environment, (iii) promotion of respectful, honest and committed relationships with stakeholders, (iv) dignified treatment between employees and towards clients, suppliers and the community as a whole, (v) transparent and respectful performance of agreements established with clients in order to provide a quality service.

The Rules of Conduct for specific situations establish: (i) protection of client and own confidential information and the prohibition of its use for personal benefit, (ii) the way to act in the face of a conflict of interest, (iii) guidelines for action against

the offering of gifts and hospitality, (iv) forms of action against governments, customers, suppliers, competitors and society within a framework of cordiality and simplicity in treatment and agility and quality of service offered, (v) compliance with applicable regulations and current policies, (vi) money laundering and terrorist financing prevention guidelines, (vii) action guidelines when hiring employees.

The Ethics & Values Line is made available to employees and third parties so that they can anonymously report possible irregularities or improper conduct. Confidentiality and anonymity of reports is guaranteed and any type of retaliation or negative consequence towards employees who make them is prohibited.

5.1.2. Customer Gift and Business Travel Policy

The Policy on Customer Gifts and Business Travel establishes guidelines for action that prevent possible corrupt practices with public officials. It establishes (i) prohibition of receiving and giving gifts and hospitality,

except those allowed by the exceptions to both public officials and individuals, (ii) guidelines for action against invitations to events and business trips from clients, (iii) obligation to notify or request authorization from the Compliance Department on certain occasions, and (iv) obligation of the latter to keep a Registry of Gifts.

5.1.3. Donation Policy

This Policy recognizes the importance of contributing to maximize sustainable development of the community through proactive participation in solving its social problems and improving quality of life of the population.

In this sense, the priority axes of action and therefore recipients of the Grupo Supervielle donations are: (i) Childhood, (ii) Education, (iii) Senior Citizens, and (iv) Institutional Strengthening.

This Policy establishes donation conditions, requirements that the donee must meet, an approval scheme and certain prohibitions.

It is prohibited to make donations: (i) in cash, (ii) directly to a natural person, (iii) in order to obtain a contract or do a business and / or depend on a commercial agreement, (iv) donations, sponsorships or contributions of any kind to a national, provincial or municipal government or to any public body or government agency or to public companies with majority state participation.

This policy provides for the creation of a donation registry that must contain: the donor company or person, bylaws, a succinct description of the donor company activities, identification of the donor, unit proposing the donation, specification of the good object of donation, justification,

amount of all donations made in the last two years, employees or managers who

hold positions in the governing bodies of the donor company.

5.2. GUIDELINES FOR ACTION WITH THIRD PARTIES

5.2.1. Public sector. Specific rules and procedures to prevent illegal activities in the field of tendering and bidding processes, in the execution of administrative contracts or in any other interaction with the public sector.

When relating with public bodies, transparency and accountability are essential elements for promoting integrity and preventing corrupt practices.

In this sense, Grupo Supervielle employees must act with the following non-exhaustive criteria:

- Decisions made in relation to the identification of business opportunities and the signing of contracts with the public sector will be dealt with in collegiate areas taking into account this Program.
- The management of contracts and awards will be carried out avoiding

5.2.2. Third Party Intermediaries. Due diligence

Sanctions for crimes established in the Criminal Code can be applied to the company when the crime has been committed by a third party in its name, interest, or benefit.

Before hiring any third-party service to act on behalf of Grupo Supervielle, the business area must carry out a due diligence process in order to know its intermediaries and prevent possible improper conduct on the part of those who act on its behalf.

The analysis will include at least:

corruption practices, it is forbidden to carry out agreements with competitors or future competitors to present themselves to bids or tenders.

- Any practice that alters the normal and transparent development of the process should be avoided.
- Negotiation with other companies in order to alter the price of the tender or bid will be avoided.
- During the offer preparation period, the participation of a plurality of sectors will be encouraged in such a way that there are cross-controls that prevent non-compliance with this program.
- The documentation and the offer to be presented in the tender or bid must be formally approved. The person responsible for the Integrity Program will participate in the approval process.
- Participation in competitive processes will be promoted avoiding direct hiring.
- Evaluation of compliance with obligations established in the Prevention of Money Laundering and Terrorism Financing Handbook.
- Information on who are the people who are going to carry out the work entrusted, who are their employees; and if any of the above persons have a direct or indirect relationship with public officials or employees.
- Documentation of their economic activity.
- Reputation and trajectory evaluation and documentation of the third party in

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their market and his/her experience in tasks similar to the one that is being requested.

- Acceptance of this policy unless they have their own integrity program and it is made available to Grupo Supervielle.
- Special attention should be paid when the hiring of the third party is carried out on the recommendation of a public official, when the intermediary does not have proven experience in the matters for which he is hired, when he/she has a fluid relationship with public officials and offers it as an additional value of its services, when the third party refuses to sign the terms and conditions of the Integrity Program for the Prevention of Corruption.
- The report prepared by the business area must be made available to the Compliance Department, which will issue its opinion regarding the

suitability and adequacy of the agent, intermediary or advisor to intervene in the operation.

- The Compliance Department or the Audit Department may require performance of a due diligence process subsequent to the signing of the contract in the event of anything arising that makes a new assessment of the suitability of the third party necessary, in any case when the third party request reimbursement for unusual expenses and when the third party has not gone through this process. Pending payments may be suspended while the existence of a risk of corruption is determined.
- Any company of Grupo Supervielle that acquires a business or a company must carry out a due diligence process in order to detect risks of non-compliance with this Program before making a final decision on the investment or the merger.

5.3. TRAINING

Grupo Supervielle will implement and maintain a Training program to provide continuous training in anti-corruption matters to directors, managers, and employees.

The action will be carried out through the Compliance Department in coordination with Human Resources and will be mandatory for all employees.

The training program must include at least the following warnings.

- Grupo Supervielle is committed to fostering a culture of integrity and promotes strict compliance with laws and the integrity Program for the Prevention of Corruption.
- Grupo Supervielle condemns corruption both in relations with the

public administration and in the private area, establishing zero tolerance for this type of behavior.

- Under no circumstances may the needs or convenience of the business prevail over strict compliance with laws and the integrity program for the Prevention of Corruption.
- Non-compliance with laws and the Corruption Prevention Integrity Program may involve not only the dismissal of the employee involved but also criminal cases.
- Corruption constitutes a crime and Grupo Supervielle undertakes to criminally denounce the people who have incurred it.
- It is forbidden to accept or receive gifts or hospitality that detract from the business relationship and may be

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construed as a bribe or retribution for favoritism. Except for the exceptions provided in the "Customer Gift and Business Travel Policy."

- When public officials are mentioned, it also includes political representatives, company employees of international organizations, employees of companies and public bodies, employees or representatives of political parties and candidates in political elections.
- Acts of corruption may exist not only through the public official himself/herself, but also when the beneficiary is a person or entity linked to the official.
- It will be necessary to take special care in controlling the activities of third parties related to Grupo Supervielle

(suppliers, advisors, consultants, partners, etc.) to avoid any act of corruption.

- In no case will the argument that "everyone does it" or that "if I don't do this, I lose the business" will be acceptable.
- Reporting cases of corruption in the Ethics & Values Line is essential.
- Any person who perceives a possible corrupt behavior must immediately inform it through said channel or directly to the Compliance Department, without any fear of retaliation or negative consequences.
- In case of doubt as to whether a certain action is acceptable or not, the Compliance Department must always be consulted.

5.4. INTERNAL INVESTIGATIONS

The Compliance Department may carry out internal investigations in order to investigate a specific problem or a particular complaint. In these cases, an audit or investigation of records, books and accounts may be carried out in order to

prevent and detect violations of anti-corruption laws and procedures and to ensure compliance with this Program and other internal policies and procedures. All employees have the obligation to cooperate fully when requested.

5.5. ACCOUNTING CONTROLS

Grupo Supervielle's policy is to keep and maintain records and accounts that accurately and precisely reflect the transactions and dispositions of the assets of transactions it carries out.

The following accounting controls are established in order to prevent undue payments:

- It is strictly forbidden to change, omit or misrepresent records to conceal activities that are improper or that do

not correctly indicate the nature of a recorded transaction.

- Bank accounts that are not adequately reflected in accounting will not be kept.
- The invoices that are paid must have the pertinent authorization and must correspond to services actually carried out.
- Prices to be paid must be those provided for in the contracts and, if the latter do not exist, they must be market value.
- No cash payments will be made.

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- For the payment of services provided, bank accounts in the name of persons other than the third party providing the service or located in financial entities

that do not have an adequate system for the prevention of money laundering and terrorist financing will be rejected.

5.6. ETHICS & VALUES LINE

Grupo Supervielle makes the Ethics & Values Line available to employees and suppliers in order for any employee or supplier who is aware of any event that allegedly violates this policy to report this situation. This complaint will start an internal investigation that will guarantee

the rights of those investigated, in order to impose the corresponding sanctions.

Any retaliation against employees who have reported in good faith is prohibited and the right to defense of the accused is guaranteed.

Contact: 0800-777-7813

www.eticagruposupervielle.kpmg.com.ar - User: Supervielle - Password: Supervielle.

6. COMPLAINT

Grupo Supervielle undertakes to report to the authorities situations in which, after an internal investigation, it is concluded that the conduct under investigation may

constitute a crime. It also undertakes to return the undue benefit obtained, if applicable.

7. MANIFESTATION OF ADHESION. ANNEX I

The third party intermediaries hired by Grupo Supervielle must sign the Declaration of Adhesion to the Integrity Program for the

Prevention of Corruption of Grupo Supervielle established in Annex I.

ANNEX I

EXPRESSION OF KNOWLEDGE AND ACCEPTANCE OF THE ANTI-CORRUPTION REGULATIONS OF GRUPO SUPERVIELLE S.A AND ITS COMPANIES

Grupo Supervielle S.A. is committed to fostering a culture of integrity that promotes strict compliance with laws, regulations, and best market practices.

It requires those who act on its behalf honesty and transparency in their relationship with the Public Administration and prohibits the performance of any act that can be understood as an act of bribery, influence peddling or any other form of corruption, establishing zero tolerance for this type of behaviors.

Grupo Supervielle S.A. prohibits the following conduct:

- Offering gifts to a public official in order for him to do, delay or stop doing something related to his/her duties.
- Offering gifts to a third party so that he or she will unduly assert his/her influence before a public official, in order for the official to do, delay or stop doing something related to his/her functions.
- Offering or granting to a public official of another State or of an international public organization, whether for his/her benefit or that of a third party, sums of money or any object of pecuniary value

or other compensation, such as gifts, favors, promises or advantages, in exchange for said official performing or omitting to perform an act related to the exercise of his/her public functions, or to enforce the influence derived from his/her position, in a matter related to a transaction of an economic, financial or commercial nature.

- Access requests or requests for commissions, remuneration, gifts, benefits, or economic advantages that any of the aforementioned persons may make.
- Accept commissions, remuneration, gifts, benefits or economic advantages from third-party companies or suppliers in compensation for the contracting of products or services.
- Offer and accept any type of gift or benefit, which exceeds what is accepted by the usual, social, and courtesy uses, in compensation for the contracting of some type of service or product related to Grupo Supervielle.

The undersigned declares to be aware of these principles and guidelines of conduct and undertakes to respect them for the duration of their management on behalf of [GRUPO SUPERVIELLE COMPANY NAME].