GRUPO SUPERVIELLE



Business Gifts and Entertainment Policy of

Grupo Supervielle S.A.

December 22, 2017

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1. INTRODUCTION

Grupo Supervielle is committed to fostering an integrity culture that promotes strict compliance with the laws, regulations, internal codes and good practices applicable to the industry. In that sense, it is against, and has zero tolerance for, corrupt practices both in the sphere of the relations with the public administration and with private companies. This policy prohibits those practices that may be deemed as contrary to this **integrity** culture.

2. GOVERNANCE

The Board of Directors of Grupo Supervielle shall be responsible for reviewing and amending this Policy in line with the recommendations of the Ethics, Compliance and Corporate Governance Committee.

The Compliance Management shall be responsible for implementing this policy.

3. SCOPE

This Policy applies to Grupo Supervielle S.A. and its related companies and any reference to Grupo Supervielle in this document shall include each of its related companies. Non compliance may result in the application of labor penalties.

4. PRESENTS AND GIFTS

No presents or gifts may be accepted which may distort the business relationship and be construed as a bribe or a payment of favors.

In that connection the following is set forth:

Public Officers. The delivery, promise or offer of any payment, fee, gift or compensation to public officers, employees of public utilities or agencies is forbidden, whether directly or through their related companies. This prohibition applies to public officers of any country.

Officers of private companies. The delivery, promise or offer of any payment, fee, gift or compensation to an employee, director or manager of other companies or entities, whether directly or through related persons or companies intended to benefit Grupo Supervielle to inappropriately obtain a commercial advantage.

Employees. The request or acceptance of a payment, fee, gift or compensation by employees for operations carried out by Grupo Supervielle or in connection with the business of Grupo Supervielle from customers, suppliers, brokers, contractors or other third parties.

Employees are prohibited from obtaining a personal benefit due to their position in

Grupo Supervielle or due to a commercial opportunity in which Grupo Supervielle is involved.

Exceptions. The following actions shall not be prohibited unless due to their frequency, characteristics or circumstances, they might be construed by an unbiased observer as intended to influence the objective discretion of recipient:

i. Gifts of symbolic value (such as sales/advertising promotions) usually offered.
ii. Ordinary gifts on special occasions (year end, anniversary of Grupo Supervielle, etc.) not exceeding US$150.
iii. Normal invitations not exceeding the reasonable bounds of the normal social courtesy.
iv. Invitations to events sponsored by Grupo Supervielle.

Exceptions for Public Officers. For these exceptions to apply, gifts and invitations to public officers shall meet the following conditions:

- Have a clear and transparent reason.
- Be moderate and austere.
- Be registered.
- Expenses incurred in connection thereto must be reported through normal proceedings.
- Do not exceed the bounds of the normal social courtesy.
- Be made to a large number of persons.
- Comply with the laws applicable to public officers.

Intermediaries. These prohibitions apply both to those gifts made directly by Grupo Supervielle or indirectly through partners, employees, agents, brokers or other third parties.

Frequency. Gifts not exceeding US$150 may be accepted as set forth in the exceptions, but only on specific occasions and not on a regular basis.

5. INVITATION TO EVENTS AND BUSINESS TRIPS BY OR TO CUSTOMERS

As set forth in item 6, and prior authorization by the Compliance Management, the following may be accepted or offered:

- **Invitations** to corporate, sports or musical events and presentation of goods or services, visits to establishments, provided they meet the following requirements:
  - They have a host and are not exclusively organized for Grupo Supervielle.
  - They are reasonable and for the genuine interest of Grupo Supervielle (business lunch or dinner or musical or sports event).
  - They are not sumptuous.
  - They are not frequent.
  - They are not always made or organized by the same customer or supplier.
  - The invitation is made to Grupo Supervielle at least 5 (five) business days in advance.
  - Trips abroad must follow a business agenda.
  - They are not made during the course of negotiations in which Grupo Supervielle is a party.

This policy does not apply to trips to attend congresses, seminars and/or training.

- **Commercial Trips for Customers.** Customers may be invited to attend events organized by Grupo Supervielle, provided that said invitations meet the following requirements:
  - They follow a business agenda.
  - They are made to customers of prospective customers of Grupo Supervielle for a specific aim.
  - They are not made during the course of ongoing negotiations.
  - They do not involve Public Officers.

6. COMPLIANCE MANAGEMENT: NOTICES, AUTHORIZATION AND REGISTRATION

Notice to the Compliance Management. Any person receiving a gift for a value in excess of US$150 shall inform the Compliance Management, which shall decide whether said gift is to be returned or given away to a public welfare organization in the name of Grupo Supervielle, as deemed convenient. This situation shall be duly reported to the person who made the gift.

Any request for payment, fees, gifts or compensation shall be rejected and notified to the Compliance Management.

Authorization by the Compliance Management. Invitations made by third parties to employees and invitations made by employees to customers must be authorized by the superior officer of the person receiving or making the invitation and by the Compliance Management.

The Compliance Management shall be responsible for approving the trip, or for reassigning it to another employee of Grupo Supervielle or for rejecting the invitation.

Register. The Compliance Management shall keep a register of gifts, invitations and trips that do not fall within the exceptions and those made by Grupo Supervielle and shall contain:

1. Name of the person delivering the gift or invitation.
2. Name of the recipient.
3. Authorization by the direct supervisor.
4. Date of receipt.
5. Value of the gift or invitation
6. Decision made regarding the inquiry.

7. ETHICS HOTLINE

Any violation of this Policy may be reported through the Ethics Hotline:

0800-777-7813
https://eticagruposupervielle.lineaseticas.com/

Username: Supervielle
Password: Supervielle