GRUPO SUPERVIELLE

CODE OF ETHICS OF **GRUPO SUPERVIELLE S.A**



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1. APPLICATION OF THE CODE OF ETHICS

The provisions of this Code of Ethics apply to all of GRUPO SUPERVIELLE's staff, including all employees, those under an employment contract and those in a trial period, the members of the Board, independent advisors and any third party who, by virtue of their relationship with GRUPO SUPERVIELLE, may affect the reputation of GRUPO SUPERVIELLE or of any of its entities and companies.

For the purposes of this Code of Ethics, GRUPO SUPERVIELLE shall be construed to mean Grupo Supervielle S.A. and its subsidiaries or related entities and companies, including Banco Supervielle S.A, Cordial Compañía Financiera S.A, Supervielle Asset Management S.A, Sociedad Gerente de Fondos Comunes de Inversión, Tarjeta Automática S.A, Espacio Cordial de Servicios S.A., Supervielle Seguros S.A., Invertir Online S.A, Microlending S.A and Sofital S.A. and those to be created in the future. The term "Organization" may also be used in this Code of Ethics to refer to GRUPO SUPERVIELLE and its related entities and companies.

It is the responsibility of everyone at GRUPO SUPERVIELLE to be acquainted with and to fulfill the provisions of this Code. Noncompliance with this Code of Ethics may result in the application of disciplinary and legal penalties and in the termination of infringing employees of GRUPO SUPERVIELLE.

The guidelines set forth by this Code of Ethics prevail over any order by senior officers and is part of the set of rules and regulations in force at GRUPO SUPERVIELLE.

The Compliance department shall be responsible for the operational management of this Code of Ethics and for:

- Disseminating the Code to all employees.
- Answering any queries related to the Code.
- Proposing amendments to the Code.
- Ensuring that new hires receive and read the Code and sign the commitment letter, which shall be attached to the employees' personal file.

The Internal Audit department shall receive and manage any reports filed in connection with the Code.

2. FUNDAMENTALS

This Code of Ethics is based on a set of key values which identify GRUPO SUPERVIELLE and which shall be observed by its staff in their daily interaction with customers, suppliers, co-workers and control agencies.

3. ETHICAL VALUES

The values identifying GRUPO SUPERVIELLE include:

LEADERSHIP (To Know where to go)

We develop organizational skills to be a benchmark in our target markets..

We believe in:
- Leading by example.
- Dreaming big.
- Training and developing our teams.
- Exceeding our own goals.

We will not accept:
- Setting little challenging objectives.
- Lack of team work.
- Lack of focus.

INNOVATION (To Change with ideas)

We go beyond limits in the search for new solutions that add value and enhance competitiveness..

We believe in:
- Enhancing our customer experience.
- Seeing to the future with our present in mind.
- Being flexible and open.

We will not accept:
- Conformism.
- Fear of the unknown.
- Mental barriers hindering growth.

COMMITMENT (To Give more)

We provide sustainable solutions to the demands of our customers and communities where we operate.

We believe in:
- Acting with passion.
- Fulfilling agreements.
- Fostering closeness.
- Getting in the customers' shoes.
- Exceeding expectations.

We will not accept:
- Indifference and lack of accountability.
- Undertaking to do something we won't be able to do.
- Forcing undesired situations.
- Irresponsible attitudes towards results.
- Bad faith and lack of ethics.

RESPECT (To Think of others)

We listen to and understand the needs of our customers and we foster constructive personal and business relations..

• **We believe in:**
Treating others as we would like to be treated.
• Communicating and building on diversity.

We will not accept:
• Achieving results at any price.
• Imposing ideas.
• Lack of empathy.
• Discrimination.

EFFICIENCY (To Add value)

We provide quick and quality answers using available resources in a responsible and sustainable fashion.

We believe in:
• Focusing in processes that add value.
• Recognizing initiatives seeking ongoing improvement.
• Caring for the cost structure.

We will not accept:
• Ignoring mistakes and not learning from them.
• Red tape.
• Improvisation.

SIMPLICITY (To Facilitate)

We intend to facilitate our customers' lives.

We believe in:
• Taking care of the customers' time.
• Operating through robust and simple processes.
• Making decisions as close as possible to customers.

We will not accept:
• Untrusted decisions that get in the way of delegation and cooperation.
• Generating unnecessary or burdensome requirements.
• Unproductive or inconsiderate use of our own and our customers' time.

4. COMMUNICATION

The Compliance department is responsible for communicating and updating this Code of Ethics.
GRUPO SUPERVIELLE requests that its Directors, Managers and senior officers disseminate this Code to their employees and that they lead by example.

5. PRACTICES OF THE CODE OF ETHICS OF GRUPO SUPERVIELLE

5.1. FULFILLMENT OF THE LAW

GRUPO SUPERVIELLE's staff shall strictly fulfill the laws of Argentina, avoiding any conduct that, even when not breaching the law, could damage the reputation of GRUPO SUPERVIELLE or any of its subsidiaries in the eyes of the community, the government or other agencies and/or give rise to adverse consequences for its business, image and/or reputation.
Nobody at Grupo Supervielle shall knowingly engage with third parties in the violation of any law whatsoever or act in a way that conflicts with the rule of law.
Everybody at Grupo Supervielle shall act with decency and integrity when dealing with municipal, provincial or national government authorities and employees, ensuring that any information or documents submitted and statements made are true, clear and complete.

5.2 PROTECTION OF GRUPO SUPERVIELLE'S ASSETS

GRUPO SUPERVIELLE's employees shall take all actions leading to the protection of the Organization's assets and property.

All of the Organization's transactions shall be subject to adequate internal controls intended to protect its assets and property and shall be subject to any such authorization schemes as are required. All transactions shall be adequately and accurately recorded pursuant to applicable accounting standards. Employees shall ensure the integrity and confidentiality of all assets and property of GRUPO SUPERVIELLE, respecting internal controls and applicable authorization schemes.

Any hardware or IT devices made available to employees by GRUPO SUPERVIELLE (including computers, printers, email, etc.) are work tools and must, therefore, be exclusively used for the Organization's activities and not for personal or other uses.

For the use of IT equipment and their applications, GRUPO SUPERVIELLE shall assignpasswords to employees which are for personal use and not to be disclosed.

Employees shall be liable for the undue use of passwords and may be subject to penalties. Anything related to email and e-communication systems in general, including all communications and information created, received, saved or sent through the Organization's systems is the property of GRUPO SUPERVIELLE.

Employees have no right to keep confidential any personal material or communications created, received, saved or sent using the email or IT systems of GRUPO SUPERVIELLE including independent internet providers. GRUPO SUPERVIELLE shall take all actions required to clearly and accurately implement the above, ensuring at all times the intended use of the tools provided for performance of the work and care of the rights of the persons involved, pursuant to applicable laws.

5.3 EQUAL OPPORTUNITIES. NON-DISCRIMINATION

GRUPO SUPERVIELLE shall provide equal opportunities in terms of employment and professional promotion, avoiding discrimination by reason of sex or sexual orientation, race, religion, origin, civil status or social condition.

GRUPO SUPERVIELLE's employees involved in hiring, selection and/or professional promotion processes and/or making decisions thereunder must act objectively, avoiding such practices with a view to identifying those persons that are more suitable for the position to be filled, promoting at all times equal opportunities.

Anyone was a victim or a witness of discrimination or harassment at the work place must promptly contact their Immediate Supervisor or, if not possible, the Human Resources department.

5.4 FAMILY RELATIONSHIPS AT THE WORK PLACE

With a view to preserving objectivity and professionalism, any sentimental relations between employees in the same area and/or between employees who, by reason of their tasks or duties, directly or indirectly report to each other and/or are under a supervision relationship, must be notified to superiors who shall deal with the matter with such confidentiality as is applicable. In any such cases, one of the employees shall be transferred to another area.
An employee developing commercial or administrative duties (manager, customer officer, account, investment or similar officer) who has a personal, commercial, family or friendship relationship with customers or suppliers, whether natural or legal persons, must so notify their superior so that another employee is assigned to deal with the commercial relationship with the customer or supplier, as the case may be.

5.5 DRUG-FREE WORK PLACE

Employees shall not use alcohol or drugs while performing their duties. Compliance with the provisions of this Section 5.6 is of the essence for GRUPO SUPERVIELLE so as to keep required performance levels and preserve the employees' health and safety. Alcohol may be used solely at corporate or social events held at the work place, such as end- of-year celebrations, meals with customers or similar, to the extent so does not affect the employees' skills or health.

The possession and/or use of illegal drugs and of alcohol is forbidden as is the inadequate use or abuse of legally prescribed drugs (a) within the premises of GRUPO SUPERVIELLE and/or (b) while developing activities in representation of, related to, or that may have an impact on, GRUPO SUPERVIELLE.

5.6 SMOKE-FREE WORK PLACE

GRUPO SUPERVIELLE's premises are "SMOKE-FREE" to favor a healthy work environment, where smoking is forbidden in the premises, including external halls, balconies and rooftops.

5.7 HEALTH AND SAFETY

Health and safety at the work place are key to adequately develop daily tasks within GRUPO SUPERVIELLE.
All employees are responsible for complying with safety measures in place. In addition, senior officers must promote such measures among the employees reporting to them.

5.8 FAIR TREATMENT

GRUPO SUPERVIELLE provides a friendly, violence-free work environment. Threats, threatening conducts, harassment, intimidation and aggression are forbidden at the work place. It is critical to work at a place where there is respect and friendliness among employees and with external customers, suppliers and the community.

GRUPO SUPERVIELLE' employees must at all times comply with the guidelines related to conduct and fair treatment, religion, sexual choice, race and other personal qualities.

5.9 NON-DISCLOSURE OF THE INFORMATION OF GRUPO SUPERVIELLE AND CUSTOMERS. SECRECY AND CONFIDENTIALITY

GRUPO SUPERVIELLE's employees must not disclose any accounting or documentary information of GRUPO SUPERVIELLE that has not been published as required by law.

No employee must disclose or use the information obtained in the course of their relationship with GRUPO SUPERVIELLE for their own or third party benefit or personal advantage.
Employees of GRUPO SUPERVIELLE must take actions to ensure confidentiality, integrity and availability of customer and third party data and information related to GRUPO SUPERVIELLE. This includes the identification of the data to be protected, an adequate protection for such data and granting access to protected data only on a need-to-know basis. In addition, all employees of GRUPO SUPERVIELLE subsidiaries subject to the regulations of the Central Bank of Argentina, that are financial entities, financial companies or another typeof entity governed by the Financial Entities Law of Argentina (LEF, by its acronym in Spanish), must fully comply with "Bank Secrecy" provisions, under the terms of section 39 of the LEF, keeping strictly confidential any information that may come to them.

This implies that no information may be disclosed that is related to any type of bank deposit or account of the customers of such GRUPO SUPERVIELLE subsidiaries (including their balances and account numbers as well as any data that may allow identification of the deposit or account or establish their holder); provided, however, that (a) courts in legal proceedings; (b) the Central Bank of Argentina, (c) Argentine national, provincial or municipal tax agencies, and (d) the entity itself, with the prior authorization of the Central Bank of Argentina, shall be released from complying with "Bank Secrecy" provisions, subject to the specific conditions set by the LEF, as regulated, and, particularly, applicable internal procedure manuals of the Organization.

Any information related to the activities or businesses of a subsidiary of GRUPO SUPERVIELLE that is a public company, which has not yet been released to the market and may have an impact on the price of its securities or may affect the placement of securities and their dealing, must be kept strictly confidential.

Employees of independent auditing firms, consulting firms or any other supplier providing services at GRUPO SUPERVIELLE are specifically comprised by the provisions set forth in Section 5.8. Likewise, the employees of any supplier providing services at GRUPO SUPERVIELLE must refrain from using for themselves or third parties any information known by them by reason of the provided service and must keep it confidential pursuant to applicable rules. Employees must refrain from:

- Disclosing confidential information to another person who then buys or sells securities of GRUPO SUPERVIELLE, including purchase or sale options of such securities.

- Buying or selling securities of another company, the value of which could be affected by measures of GRUPO SUPERVIELLE which have not yet been publicly released, and purchase or sale options of such securities.

5.10 OBJECTIVITY AND CONFLICT OF INTEREST

All employees of GRUPO SUPERVIELLE should avoid:

- Acting on behalf of GRUPO SUPERVIELLE in situations in which they, their relatives or close friends have any kind of personal interest.

- Making an undue use of GRUPO SUPERVIELLE's name.

- Accepting any kind of favor from any individual or entity with which GRUPO SUPERVIELLE has a commercial relationship.

- Taking personal advantage from a commercial opportunity in which GRUPO SUPERVIELLE is involved.

- Cooperating with a commercial competitor of GRUPO SUPERVIELLE.

In case a conflict of interest arises due to reasons of employment or other, employees shall promptly inform their superior of the facts, so as to be released from such position as creates the conflict of interest. In case of doubt about whether an activity may give rise to a conflict of interest with GRUPO SUPERVIELLE, employees must consult their superiors and the Human Resources department, who shall decide about the course of action to be taken in each case.

Employees shall not carry out commercial or professional activities concurrently with those carried out for GRUPO SUPERVIELLE that might somehow compete with GRUPO SUPERVIELLE's businesses.
Employees that may influence the decision-making process of GRUPO SUPERVIELLE's business or the close relatives of those employees (spouse, parents, children, siblings) shall not have a significant financial interest, including without limitation and by way of example, being shareholders or managers of a goods or services supplier of GRUPO SUPERVIELLE. If an employee or one of their close relatives has a significant financial interest in a competitor of GRUPO SUPERVIELLE, they must so inform the corresponding Human Resources department of GRUPO SUPERVIELLE.

Executives, managers, professionals and technicians who carry out activities not related to GRUPO SUPERVIELLE shall provide detailed information on those activities and their scope to the corresponding Human Resources department of GRUPO SUPERVIELLE.

Employees shall not engage in civic or political activities during regular business hours that might give rise to a conflict of interest or that might be construed as GRUPO SUPERVIELLE's participating in those activities.

5.11 GIFTS

The Policy of Gifts and Commercial Trips sets forth the main guidelines of GRUPO SUPERVIELLE on gifts.
No gifts shall be accepted, offered or received that may distort the commercial relationship and may be construed as bribery or cronyism. Bribery is strictly forbidden.

The Compliance Department is in charge of construing this Policy.

5.12 RELATIONSHIP WITH THE MEDIA

The relationship with the media is coordinated only by the Press Forum. No employee of GRUPO SUPERVIELLE must answer questions to the media, give interviews or make publications on behalf of or in connection with GRUPO SUPERVIELLE, or participate as speaker of GRUPO SUPERVIELLE in conferences or events organized by third parties, without the prior authorization of the Press Forum.

Requests for authorizations to the Press Forum shall be made through the Communications department.

5.13 RELATIONSHIP WITH GOVERNMENTAL AUTHORITIES

GRUPO SUPERVIELLE is politically neutral and is committed to fulfilling all legal obligations imposed to it at local, provincial and national level in Argentina and in any other country where it may develop its activities.

5.14. INTEGRITY PROGRAM FOR THE PREVENTION OF CORRUPT PRACTICES

Grupo Supervielle is committed to an integrity culture that promotes strict compliance with the laws, regulations, internal codes and good practices applicable to the industry.

This program requires that employees interact with honesty and transparency with Public Administration officers, so as to prevent any act that might be deemed as bribery, influence

peddling or any other corrupt practice, and stipulates zero tolerance to this kind of conducts.

GRUPO SUPERVIELLE has in place an Integrity Program for the Prevention of Corrupt Practices that consists of a set of internal actions and proceedings to promote integrity, oversight and control, and is oriented to prevent, detect and fix irregularities and prevent those conducts that are punishable pursuant to the aforementioned rule. The Program consists of: (i) integrity policies, (ii) guidelines for the relationship with third parties, (iii) training, and (iv) internal investigation.

The Compliance department is in charge of construing said Program.

5.15 RELATIONSHIP WITH CUSTOMERS

Customers are of key importance for GRUPO SUPERVIELLE. Therefore, it is everyone's responsibility to maintain a respectful, honest and committed relationship with customers and provide them a high quality service.

GRUPO SUPERVIELLE's policy is to carry out transactions with individuals and companies of high moral standing.

Confidence and transparence are of the essence to establish long-lasting commercial relationships. Therefore, the following must be taken into account:

(a) Friendlines

The relationship with customers, suppliers and public in general must always be friendly and straightforward. The relationship with customers must be polite and professional.

(b) Agile and high quality services
GRUPO SUPERVIELLE is committed to providing high quality and agile services and to meeting and even exceeding the customers' expectations.

Employees must maintain a neat and professional appearance at all times, since they are the first image that customers get of GRUPO SUPERVIELLE.

GRUPO SUPERVIELLE employees must offer customers only those products or services that are fit to theirs needs and characteristics. Customers must become acquainted with and understand the conditions of the different products and services, their benefits, risks and associated costs prior to entering into a contract for any such products or services.

Without prejudice to any other requirement or task that GRUPO SUPERVIELLE employees must comply with in connection with the applicable internal proceedings, employees shall:

- Provide to customers objective, accurate and complete information on the different products and services, their conditions and risks, expenses and applicable fees, particularly in the case of high risk financial products.

- Charge the applicable charges and fees and apply the commercial conditions approved for each case.

- Refrain from offering customers products or services that entail no benefit for them with the only purpose of obtaining fees or income.

- Refrain from offering better contract conditions or benefits only to certain customers.

- Make sure that contracts for products and services are entered into pursuant to applicable internal proceedings, keeping the required documents and giving to the customer a copy thereof.

- Refrain from providing misleading information in the advertising, offering and sale of products and services.

5.16 RELATIONSHIP WITH SUPPLIERS

GRUPO SUPERVIELLE promotes a respectful and kind relationship with its suppliers, and verifies that the supply of said goods and services is made pursuant to applicable laws.

GRUPO SUPERVIELLE expects that its suppliers follow strict ethical rules and act with integrity, trust, respect, honesty and transparency.

Those employees who, by virtue of their position in the Organization maintain a relationship with GRUPO SUPERVIELLE suppliers, must comply with and enforce the provisions of this Code, and in particular of Section 5.14, abiding by the provisions of the procedure manuals of the Organization applicable to contracts with suppliers.

5.17 FAIR COMPETITION

GRUPO SUPERVIELLE promotes fair competition. Therefore, any practice that weakens fair competition is prohibited.

5.18 CORPORATE SOCIAL RESPONSIBILITY

The aim of GRUPO SUPERVIELLE is to be recognized as a change agent and a creator of sustainable social value.
Its main objectives regarding Corporate Social Responsibility (CSR) are:

- Implement CSR in GRUPO SUPERVIELLE's management model, as a guiding principle of the business strategy, and a sustainable development agenda.

- Develop an innovative and transforming strategy with specific, measurable and high impact actions.

- Synergize its CSR initiatives with the local communities in which GRUPO SUPERVIELLE operates.

- Build and promote a collaborative organizational culture, and promote the participation of its employees in CSR actions.

5.19 SOCIAL MEDIA

GRUPO SUPERVIELLE considers that its employees are ambassadors of its Brand and therefore has prepared some Guidelines for the use of Social Media that are supplemental to this Code of Ethics and should be read together.

It is forbidden to share information of Grupo Supervielle's internal social media on other external social media.

6. ANTI-MONEY LAUNDERING AND TERRORIST FINANCING

GRUPO SUPERVIELLE is strongly committed to anti-money laundering and terrorist financing practices, so as to prevent that the entity is used as a vehicle for this kind of crimes.
Money laundering and terrorist financing entail serious legal, economic and reputational risks. All employees must be aware of the risks to which GRUPO SUPERVIELLE and its employees are exposed if the provisions set forth in this Section 6 and applicable internal procedure manuals are not abided by.

Thus, all employees of GRUPO SUPERVIELLE must actively cooperate in the fight against money laundering and terrorist financing practices, as follows:

• Applying the "Know Your Customer" policy before engaging customers in any business and/or product and/or service, and during the term of the relationship with them, updating all the information as may be necessary pursuant to applicable regulations.

• Paying attention to the transactions proposed, with focus particularly on:

a) Transactions unrelated to the customers' activities, resources or property;

b) Intricate transactions;

c) Business where the economic benefit for the customer is not apparent or where the profit for GRUPO SUPERVIELLE is not in line with the service to be rendered, risk level or market conditions. Special attention should be paid to the amount and nature of transactions, following the criteria of documentary support regarding identity, activity, proportion of amounts involved with the customer's activities, etc. (Operations with occasional customers).

• Paying attention to "Unusual Transactions", taking as reference the "Customer Profile", and reporting those transactions to the corresponding Anti-Money Laundering and Terrorist Finance department (Unusual Transactions).

• Requiring, within the framework of the applicable "Know Your Customer" policies and procedures, all the data necessary to complete the forms and/or systems and verifying that all requirements are met for operating with customers.

Employees must not disclose information regarding the proceedings of the Financial Information Unit [UIF], as set forth in Law No. 25.246 (as amended) and Resolutions UIF No. 30-E/2017, UIF No. 21/2018, UIF No. 28/2018 and UIF No. 76/2019. Infringement of said provisions may be punished with six months to three years of imprisonment.

7. KNOW YOUR EMPLOYEE

At the time of hiring new employees, GRUPO SUPERVIELLE shall assess their personal data and track record so as to have reasonable assurance of their professional skills and moral standing.

In addition, all Chief Officers, Heads and Supervisors shall pay special attention to the conduct of their employees, so as to be able to detect on an early stage any signs of improper conduct.

GRUPO SUPERVIELLE considers that accounts opened for payment of its employees' salaries will be used mainly to manage the funds originating from that source.

Those who will regularly or occasionally use those accounts to manage funds from other sources involving significantly greater amounts must inform of that fact in advance to the corresponding Human Resources department and submit the necessary documents as the case may be.

If the funds are derived from a commercial or professional activity compatible with their position at GRUPO SUPERVIELLE (as already indicated in this Code), employees shall so inform the corresponding Human Resources department and, if necessary, shall open an additional account to manage those funds.

8. ETHICS LINE

All employees should report about situations that might be deemed an infringement of this Code of Ethics and/or the organizational values or any other rule set forth by GRUPO SUPERVIELLE.

GRUPO SUPERVIELLE has in place an external Ethics Line that is available to all employees and related third parties to report improper acts through two channels: a toll-free telephone line or a web page. Irregular or improper acts may be anonymously reported, and corrupt practices must be reported, through these channels.

9.. COMMUNICATION OF THE CODE OF ETHICS

In order to ensure compliance with this Code of Ethics, GRUPO SUPERVIELLE requires that all employees certify that they have read and understood its content and that they will abide by these provisions in the course of their daily activities at the entity.

* * *

ADHESION TO THE CODE OF ETHICS OF GRUPO SUPERVIELLE

As employee of GRUPO SUPERVIELLE I declare that I have read this Code of Ethics and I am familiar with the key values of GRUPO SUPERVIELLE.

I undertake to respect and comply with all regulations and specific rules set forth in the Code of Ethics. I also undertake to discuss any concern regarding the construction and application of the rules and policies included herein with the corresponding department.

I comply with the conduct standards set forth herein, including the reporting on any conflict of interest, whether actual or prospective, and I undertake to promptly inform if I become involved in any situation that is or might be deemed to be a conflict of interest.

_____

Place and date

_____

Full name

_____

Position

_____

File No.

_____

Signature

GRUPO SUPERVIELLE