GRUPO SUPERVIELLE



Sustainability Policy of

Grupo Supervielle S.A.

December 14, 2022

TABLE OF CONTENTS

1. **INTRODUCTION** 3
2. **OUR SUSTAINABILITY COMMITMENT** 3
3. **SUSTAINABILITY GOVERNANCE** 4
4. **ENFORCEMENT** 5
5. **ESG - CRITICAL FACTORS OF SUSTAINABLE PERFORMANCE** 5
6. **CORPORATE DIGITAL RESPONSIBILITY** 12
7. **SUSTAINABILITY REPORT** 13
8. **ETHICS & VALUES LINE** 13

1. INTRODUCTION

This Sustainability Policy establishes basic principles and general framework of action for Grupo Supervielle's sustainability agenda management and its integration into the corporate strategy and business model.

Grupo Supervielle has consolidated a responsible management model oriented towards sustainability. Grupo Supervielle corporate social responsibility is integrated into a broader model of sustainable development that involves relations with all stakeholders (customers, employees, shareholders, suppliers, community, and governments).

Its objective is to promote a sustainable culture that contributes to value creation for the different stakeholders with which Grupo Supervielle develops its activities and to position the company as a benchmark for best practices.

Grupo Supervielle establishes and periodically monitors quantifiable metrics related to its sustainability initiatives. It does so by incorporating ESG (Environmental, Social, Corporate Governance) factors (hereinafter, "ESG") as critical factors of the long-term sustainability strategy and promoting social investment with impact (innovative and transformative).

All decisions and activities of Grupo Supervielle must be framed within an ethical and transparent behavior, considering the expectations of interested parties, applicable legislation, and international regulations.

Grupo Supervielle's sustainability agenda and the principles established in this policy are aligned with the Sustainable Development Goals (SDG) established in 2015 by the United Nations General Assembly (2030 Agenda) and with ESG objectives established by main international conventions.

2. OUR SUSTAINABILITY COMMITMENT

At Grupo Supervielle we are committed to our employees, clients, shareholders, and communities to:

- Grow sustainably, protecting the environment and acting in a socially responsible manner.
- Integrate the sustainability strategy into our business model and promote a responsible culture among our employees.
- Openly and transparently report our non-financial performance, accounting for environmental, social, and corporate governance (ESG) factors.

In order to establish itself as a sustainable organization in the long term, Grupo Supervielle intends to continue working on the construction of a sustainability culture with solid foundations in which each one of the employees feels that they are protagonists, co-responsible and co-supportive.

The foundations of a sustainability culture must incorporate the following commitments:

- Commitment from the Board of Directors
- Consistency with corporate values
- Clear and defined purpose with a sustainable vision of the business
- Employees alignment with the sustainability agenda
- Strong risk management culture
- Corporate volunteering as a multiplying factor within the organizational culture
- Products and services design with positive social and environmental impact
- Impact measurement and monitoring— builds reputation and strengthens internal sensitivity
- Internal promotion of healthy lifestyles
- Commitment to a diverse, equitable and inclusive culture
- Sustainable actions in collaboration with strategic allies.

3. SUSTAINABILITY GOVERNANCE

The Ethics, Compliance & Corporate Governance Committee (ECCG) assists the Board of Directors in formulating Grupo Supervielle's sustainability strategy.

The ECCG Committee functions will be:

- Ensure that sustainability is part of the long-term strategy of Grupo Supervielle and its related companies.
- Guide on the adoption and monitoring of best practices in environmental, economic, and social matters.
- Periodically review the commitments and sustainability policy of Grupo Supervielle, considering responsibilities assumed before its stakeholders and the strategy to follow, observing trends and best practices.
- Present the Annual Sustainability Report to the Board of Directors for its treatment and approval.

The Sustainable Finance Forum supports the work of the ECCG Committee in defining strategies linked to the development of financial products and services that promote financing of companies and projects that generate a positive environmental and social impact.

The Sustainability Department is in charge of executing Grupo Supervielle´s sustainability strategy. Reports to the ECCG Committee Chairman.

A person responsible for sustainability will be appointed among the employees who work in each of the related companies of Grupo Supervielle. The Sustainability Department will coordinate implementation of its agenda with employees of each of the business areas.

4. ENFORCEMENT

This policy belongs to the Board of Directors of Grupo Supervielle which will be the body in charge of reviewing and modifying it.

This policy is applicable to all companies of Grupo Supervielle and its non-compliance may imply labor sanctions.

5. ESG - CRITICAL FACTORS OF SUSTAINABLE PERFORMANCE

Performance of an organization in terms of sustainability is measured taking into account the following critical factors: environment, social and corporate governance (ESG).



Environmental Sustainability

How a company's activities affect the environment (energy management, eco-efficiency, natural resources management, waste disposal, environmental risks).



Social Impact

How the company treats its stakeholders (employees, customers, suppliers, shareholders, community).



Corporate Governance

How the company manages processes related to its governance (ethics, transparency, legality, integrity, accountability, internal controls).

At Grupo Supervielle we care about measuring our sustainable performance because:

- Increases investor confidence and allows them to assess whether ESG factors may affect financial performance
- Creates positioning and contributes to maintaining a good reputation--customers purchase products and/or services from a company that generates sustainable impact
- Motivates our employees and impacts our ability to attract and retain talent
- Builds connections with our regulators, partners and third parties and generates a positive corporate reputation.

Among other factors, the attention and disclosure of these non-financial performance indicators entails the following implications:

- It can provide Grupo Supervielle with a competitive advantage
- It is an opportunity to attract investors with a long-term perspective
- Allows identification of performance metrics that help improve Grupo Supervielle profile.

The Sustainability Department evaluates non-financial performance through periodic monitoring of compliance indicators with strategic objectives established by Grupo Supervielle (KPIs). Grupo Supervielle also uses the International Finance Corporation (IFC) ESG Progression Matrix as a tool for evaluation and alignment with international best practices.

Our Environmental Responsibility

We work to reduce the impact of our operations on the environment by implementing a responsible environmental management system that promotes the sustainable use of resources and the mitigation of climate change.

We adopt an integrated approach that considers the environmental implications of our decisions and activities.

We base ourselves on five lines of action assuming the following commitments.

1. Energy management

- Implement programs that promote energy efficiency to reduce energy demand and complement or replace (when possible) the use of non-renewable resources with sustainable, renewable and low-impact alternative sources
- Measure, record, and report significant energy uses
- Promote sustainable energy consumption among our employees.

2. Sustainable management of natural resources, supplies, and waste

- Adopt internal processes that promote the efficient use of natural resources used in daily operations and that reduce negative impact of waste generated as a result of our activities
- Measure, record and report significant uses of water and other natural resources
- Promote sustainable consumption of water and other natural resources
- Promote acquisition of more sustainable supplies
- Implement efficiency programs in the use of supplies utilized for our operations to minimize direct and indirect environmental impacts, considering best practice standards and indicators
- Adopt a sustainable waste management system that includes a strategy for the involvement and awareness of all Grupo Supervielle employees
- Implement an efficient waste management policy that includes the following principles: (a) separate waste generated at source, (b) reduce waste generation, (c) reuse generated waste generated, (d) ensure proper final disposal of generated waste in accordance with current legislation.

3. Climate change mitigation

- Measure, record, and report greenhouse emissions (GHG) (carbon footprint) using methods defined by internationally recognized standards and verify such measurements by independent audits
- Implement measures to progressively reduce and minimize direct and indirect GHG emissions that are within our control
- Aim at carbon neutrality goal by implementing GHG emissions compensation as complementary measures, supporting reliable emission reduction programs that operate transparently in carbon capture and storage
- Develop actions to restore natural habitats (forests, wetlands, protected areas, among others) and protect biodiversity.

4. Sustainable finance

- Promote and develop financial products and services that promote the financing of companies and projects that generate positive environmental and social impact
- Develop policies and procedures that allow analysis, categorization, and management of environmental risks in the financing of projects and other activities
- Incorporate environmental and social criteria in the process of analysis, granting and monitoring of credit and/or investment through implementation of the ARAS System, considering the magnitude of its impacts and risks and the need to establish prevention, mitigation, correction and /or compensation
- Define prohibited activities and high risk activities.

The Environmental and Social Risk Policy is attached as Annex I.

5. Awareness

Promote adequate learning in environmental matters with the purpose of promoting a culture of sustainability among Grupo Supervielle employees, suppliers, and customers.

Our Social Responsibility

We work to be a change agent that creates sustainable social value and to generate a positive impact with respect to our employees, clients, suppliers, shareholders, and communities.

Employees

We create opportunities for our employees to provide their full potential and growth, and we promote a diverse and inclusive work culture that values each individual and their contribution.

We work to attract, retain, and engage the best talent to guarantee sustainability of our business by offering quality service to clients.

The Sustainability Department and the HR Department are in charge of coordinating efforts and initiatives to jointly promote this line of action in Grupo Supervielle.

Regarding employees, Grupo Supervielle is governed by the following principles:

- Ensure that working conditions comply with applicable laws and regulations
- Respect diversity and condemn employment discrimination for reasons of gender, race, age, ethnic origin, religion, nationality, disability, or any other circumstance
- Promote equal opportunities to all its employees, aspiring to have a balanced representation between men and women in all functions and responsibilities
- Hiring policies and practices, compensation, working conditions, access to training and promotion, and termination of employment must be based solely on the demands of the job without discrimination of any kind
- Provide all its employees, at all stages of their work experience, access to training and professional development opportunities to increase their employability, in an equitable and non-discriminatory manner
- Respect human and labor rights recognized in national and international legislation, including freedom of association and collective bargaining, among other rights
- Ensure a safe and healthy work environment in its facilities, guaranteeing compliance with current legislation on occupational safety and hygiene
- Protect privacy and personal data of its employees
- Promote corporate volunteering to increase employee identification with the company and put the defined values into practice.

Customers

Grupo Supervielle intends to offer adequate products and services, always placing the client at the center of all our decisions and providing an agile, simple, and friendly service with inclusive treatment and without discrimination, giving a human meaning to financial services technology (Human Banking).

Regarding its customers, Grupo Supervielle is governed by the following principles:

- Guarantee (i) the right of customers to receive adequate, clear, sufficient, truthful, and easily accessible and visible information about products and services they contract, (ii) freedom of choice, and (iii) conditions of fair and worthy treatment
- Provide prompt and diligent treatment and resolution of queries and claims made by customers, observing current provisions on the protection of users of financial services and adopting actions that reduce their recurrence
- Expand use of financial products and services (financial inclusion) by those who already have an account, facilitating adoption of new digital tools and promoting financial education
- Ensure protection and privacy of our clients' data and adopt the appropriate measures to combat cybersecurity crimes
- Promote and develop financial products and services that promote financing of companies and projects that generate a positive environmental and social impact
- Have a solid and effective ML/TF prevention system that allows risks to

be adequately mitigated (in accordance with standards, good practices, local and international guidelines currently in force) and prevents it from being used by third parties for the commission of financial crimes.

Shareholders

We are committed to generating long-term value for our shareholders.

Regarding its shareholders, Grupo Supervielle assumes the following commitments:

- Comply with high standards of information transparency, offering its shareholders complete, clear, and truthful information through different communication channels
- Guarantee participation of shareholders in the shareholders' meeting and provide the notice of call with adequate anticipation, informing the agenda of each of the meetings
- Treat all shareholders of the same class equally with respect to voting rights, subscription rights and rights to transfer shares
- Provide shareholders with accurate and timely information on the number of shares of all classes held by the controlling shareholder (ownership concentration)
- Full and timely disclosure to shareholders of all significant transactions with affiliates of the majority shareholder.

Community

We promote social investment impacting initiatives and projects aimed at improving quality of life of the community in which Grupo Supervielle operates and has a presence.

The active participation of Grupo Supervielle in the community is carried out through different programs grouped into four lines of action:

Senior Citizens: We develop actions that promote improvements in the quality of life of senior citizens with focus on active ageing, social participation, and prevention of dependency, valuing all their abilities and recognizing the importance of their contribution to society.

Childhood: We help in the fight against child poverty and malnutrition and we work to care for our little ones by participating in initiatives that cultivate their rights, attend to their health, nutrition, and education.

Education: We promote opportunities by building the future through education because we are committed to a future that excels and for this, we promote education as a visionary and innovative practice. We promote and support education at all levels through actions that improve access to education, contribute to reducing school dropout, favorably affect the quality of education and help eradicate illiteracy.

Institutional Strengthening: We contribute to the strengthening of institutions and the construction of a long-term public agenda, promoting formulation of public policies that encourage sustainable development.

Regarding the community, Grupo Supervielle assumes the following commitments:

- Actively participate in community development to improve population quality of life through socially responsible actions that mitigate negative impacts of their own activities and optimize positive impacts
- Promote alliances with other organizations (governments, companies, NGOs) to maximize synergies and make use of complementary resources, knowledge, and skills
- Promote and support education at all levels by getting involved in actions aimed at improving access to education and educational quality
- Especially promote financial education as a lever for economic and social inclusion with the aim of encouraging savings and financial planning and promoting the use of formal financial services
- Contribute to programs that provide access to essential food to vulnerable groups
- Contribute to the formulation of public policies and participate in NGOs and associations to promote institutional strengthening in line with sustainable development goals
- Help preserve cultural and artistic heritage by supporting various cultural initiatives leveraged by patronage legislation, especially in those places where Grupo Supervielle carries out its activities
- Work with public authorities, local NGOs, and international humanitarian organizations to provide aid in humanitarian crises such as food emergencies, natural disasters, or armed conflicts to support the most vulnerable groups and mitigate adverse effects caused by such situations
- Avoid actions that perpetuate community's dependence on support or continuous presence of Grupo Supervielle.

Our Responsibility with Corporate Governance

We operate in accordance with the highest standards of corporate governance, promoting transparency, ethical behavior, integrity, respect for the principle of legality and the sustainability of our activities and those of our value chain.

Respect for the Principle of Legality

- All employees of Grupo Supervielle must comply with applicable laws and regulations, including internal policies and procedures of the companies where they carry out their activities. No individual and/or organization are above the law and, therefore, they do not have the power to act outside their frameworks
- We promote recognition and respect of human rights considered essential both for the principle of legality, and for equity and social justice and awareness, through adequate training

- Grupo Supervielle respects international regulations and good practices in terms of sustainability, especially those that contemplate social and environmental safeguards
- We periodically review the degree of compliance with laws and regulations applicable to us and implement the necessary actions to correct deviations
- All actions, decisions and doings must be subject to public scrutiny. All must be held accountable for the economic, social, and environmental impacts of these actions, assume responsibility for their negative impacts and also assume the commitment to take pertinent measures to repair them and avoid repeating them.

Transparency

- We provide information in a clear, precise, and objective manner to allow interested parties to accurately assess the impact that Grupo Supervielle's decisions and activities have on their respective interests
- Grupo Supervielle discloses in a clear, precise, and complete way information on the policies, decisions, and activities for which it is responsible, including their known and probable impacts on society and the environment.

Ethical behavior

- We promote ethical behavior based on our values matrix and a culture of integrity, both in the development of our activities and in the decision-making process, in the interaction between our employees and in the interaction with our stakeholders
- All actions of Grupo Supervielle and its employees must be governed by strict criteria of honesty, fairness, and integrity. Not only should the economic objective of the commercial activity be pursued, but also to increase positive impacts and reduce negative ones.
- We require our employees to act in accordance with the guidelines established in the Code of Ethics
- We encourage our employees to report any possible irregularities in the scope of their work in the organization and to come forward and express those concerns anonymously through the Ethics Line
- We demand honesty and transparency from employees in their relationship with the Public Administration 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.

Value chain

- Work to maximize opportunities to generate shared value with our value chain, seeking adoption by our suppliers of fundamental principles in terms of sustainability
- Integrate ethical, social, and environmental criteria into our

purchasing policy to improve consistency with our sustainability objectives
- Incorporate suppliers with a positive environmental and social impact into the value chain
- Provide support and training to the value chain to increase awareness of sustainability issues so that socially and environmentally responsible objectives can be achieved
- Carry out due diligence and adequate monitoring of suppliers with which we interact to prevent Grupo Supervielle's commitments in terms of sustainability from being affected.

6. CORPORATE DIGITAL RESPONSIBILITY

Adoption of digital technologies has become a critical factor for business growth, innovation, and operational continuity. Among its benefits are improvement in the innovation of products and services, increase in efficiency and generation of new sources of value.

Organizations today face increasing pressure from regulators, consumers, and other stakeholders to act responsibly and sustainably in the use of new digital tools. The term “Corporate Digital Responsibility” (CDR) has recently emerged to describe emerging digital responsibilities related to impacts, risks, challenges, and opportunities of digital transformation.

Grupo Supervielle is committed to developing a roadmap with the aim of adopting best practices in terms of CDR.

Key elements include:

- Define a clear set of corporate values related to our digital responsibility
- Build a holistic approach to CDR that encompasses data privacy and protection, risk management, cybersecurity, and compliance
- Invest in initiatives and policies to ensure that CDR programs are sustained over time.

At Grupo Supervielle we propose to face these challenges proactively and with a vision of the future, building and maintaining responsible and sustainable practices linked to the use of digital tools and technologies.

7. SUSTAINABILITY REPORT

We recognize the importance of openly and transparently reporting our non-financial performance. For this reason, since 2011 Grupo Supervielle has published the Sustainability Report in which we report our performance in economic, environmental, and social matters. We prepare the Sustainability Report in accordance with best international standards: Global Reporting Initiative (GRI) and Sustainability Accounting Standard Board (SASB) and we validate it with independent external verification.

We are committed to publishing an Integrated Report starting in 2022 that considers financial and non-financial performance of Grupo Supervielle where we will report on the different value creation levers. In its preparation, Integrated Reporting (IR) guidelines will be followed, considering all the company's capitals, and incorporating various relevant factors (among others, coverage, reporting principles, value creation model).

8. ETHICS & VALUES LINE

Any breach of this Policy may be reported to the Ethics & Values Line:

0800-777-7813

https://eticagruposupervielle.lineaseticas.com/

User: Supervielle

Password: Supervielle