GRUPO SUPERVIELLE



Conflicts of Interests Policy of **Grupo Supervielle S.A.**

December 22, 2017

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1. OBJECTIVE

The Policy on Conflicts of Interest (hereinafter the "Policy") is intended to define the reference framework to prevent and manage conflicts of interest so as to avoid or limit its negative impacts on the interests of Grupo Supervielle S.A. (hereinafter, the "Company").

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 of Grupo Supervielle shall be responsible for reviewing and amending this

Policy and the procedures contemplated therein with the recommendations of the Ethics, Compliance and Corporate Governance Committee and the Audit Committee.

3. SCOPE

The 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. The Policy applies to all the members of the Board of Directors, the Statutory Audit Committee, the Senior Management and other employees under any employment relationship (hereinafter the "Individuals falling within the Scope of this Policy"). This Policy shall be read and construed together with the Code of Ethics of Grupo Supervielle S.A.

4. OBLIGATIONS OF THE INDIVIDUALS FALLING WITHIN THE SCOPE OF THIS POLICY

Conflict may arise when the private interests of Individuals falling within the Scope of this Policy collide or interfere with the interests of the Company.

The main risk in an event of a conflict of interest is that it may interfere with the making of business related decisions or with the efficient and objective conduct of business.

Individuals falling within the Scope of this Policy shall adopt an honest and ethical behavior and act in furtherance of the interests of the Company, avoiding situations that may result in an actual or potential conflict between their interests and those of the Company.

4.1. Avoidance of Conflicts of Interest

A Conflict of Interest may arise in a variety of situations and is not always easily identifiable beforehand. However, all Individuals falling within the Scope of this Policy should avoid:

4.1.1. acting in the name of Grupo Supervielle in situations in which that individual or a relative or personal friend thereof has a personal interest.
4.1.2. making an inappropriate use of the name of Grupo Supervielle.
4.1.3. accepting favors from any person or entity which has a business relationship with Grupo Supervielle.
4.1.4. taking personal profit from a business opportunity in which Grupo Supervielle is involved.
4.1.5. providing business assistance to a competitor of Grupo Supervielle.

4.2. Reporting Duty

An Individual falling within the Scope of this Policy shall:

4.2.1. in case of a conflict of interest resulting from employment or other matters, report as soon as possible to their superior officer and the Compliance Management so as to be excluded from that position due to the conflict of interest.
4.2.2. in case of doubt whether an activity may result in a conflict of interest with Grupo Supervielle, ask their superior officer and the Compliance Management for advice on what steps to take in each case.
4.2.3. in case an employee is a shareholder, manager, director or member of the senior management of a competitor or supplier of goods or services of Grupo Supervielle, report that fact to the Compliance Management, for evaluation together with the Audit Committee. Those executives, managers, professionals or technicians who carry out activities outside Grupo Supervielle shall provide full information to the Compliance Management on said activities and their scope.
4.2.4. in case of any actual or potential conflict of interest involving the controlling shareholders, the members of the Board of Directors and the Statutory Audit Committee and the Senior Management, report to the Chairman of the Board of

Directors, the Chairman of the Audit Committee and the Chairman of the Ethics, Compliance and Corporate Governance Committee.

4.3. Prohibited Practices

4.3.1. no business or professional activities may be conducted concurrently with those carried out for Grupo Supervielle which might somehow compete with its businesses or affect the performance of employees during business hours.

4.3.2. No employee who holds a position of influence in the decision making process of Grupo Supervielle may be a shareholder, manager, director or member of the Senior Management of a competitor or of a supplier of goods or services of Grupo Supervielle.

4.3.3. No employee may carry out political or other activities during business hours which might result in a conflict of interest or somehow be deemed as a participation of Grupo Supervielle in those activities.

5. AUDIT COMMITTEE

The Audit Committee shall analyze the reported conflicts of interests and shall adopt such action as it may deem adequate, and report it to the Board of Directors. If necessary due to the importance of the conflict of interest, it shall issue a grounded opinion and, through the Board of Directors, shall inform the markets and corporate control agencies.

Actual or potential conflicts of interest involving the Chairman of the Board of Directors or the members of the Audit Committee shall be reported to the Board of Directors and the Statutory Audit Committee and shall be dealt with by the Statutory Audit Committee.

6. DISCIPLINARY ACTION

Individuals falling within the Scope of this Policy who do not avoid conflicts of interest or who fail to duly report any such conflicts of interest which affect or might affect them, shall be liable for those direct or consequential damages caused by them to the Company and may be subject to disciplinary action pursuant to applicable regulations and contracts in force.

7. ETHICS HOTLINE

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

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

User name: Supervielle
Password: Supervielle