GRUPO SUPERVIELLE



Purchasing Policy of

Grupo Supervielle S.A.

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1. OBJECTIVE

The Purchasing Policy objective is to define guidelines under which a products and services purchase must be carried out to guarantee objectivity, transparency and process optimization.

2. GOVERNANCE

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

The Operations and Central Services Department will oversee executing this policy.

All purchases of goods and services will be negotiated exclusively through the Operations and Central Services Department, except as established in item 5. Any exception to this policy must be processed through the Operational Risk Committee for treatment.

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 could entail labor sanctions.

4. PURCHASING PROCESS

4.1. Ways of contracting

For the purchase of goods and services Grupo Supervielle will consider the following ways of contracting:

i) Bidding
In all bidding or price check that Grupo Supervielle carries out, a minimum of three approved suppliers must participate, regardless of whether they are new or current suppliers.

ii) Direct Contract
Direct contracts may be made exceptionally, they must have the approval of the applicant and the Operations and Central Services Department, according to the current Attribution Regime.

Direct contracts will only be made when some of the following requirements are met:

- There are duly founded urgent reasons that affect the normal performance of Grupo Supervielle, especially affecting its business or its exposure to risks.
- It is necessary to contract the acquisition of goods or the provision of services, the manufacture, sale or ownership of which is exclusive to those who have the privilege to do so, provided that said circumstance is proven by reports and / or technical opinions, and there are no suitable substitutes on the market. This cause will be extensive for the case of having to carry out contracts related to equipment already existing in Grupo Supervielle and that, due to systems and / or technology reasons, it is appropriate.
- Meetings, conferences, or organization of institutional events that demand up to the amount defined in the attribution regime must be held. They will be carried out by the Marketing or Human Resources Departments.
- Commercial actions must be promoted through marketers or advertising guidelines within the approved budget lines. They will be carried out by the Channels and Marketing Departments respectively.
- There are no 2 bidders.
- For purchases and contracts up to USD 3,000 per purchase. Recording evidence that market price was paid.
- Repetitive purchases. In the case of repetitive purchases of goods and services, it may be awarded directly to the winner of the last tender / price certification, provided that:
- no more than six months have passed since the last bid / price certification.
- the supplier maintains the unit costs offered in said tender, with a nominal deviation no greater than the inflation of the period elapsed since the tender.
- the budget for such repetitive purchases does not annually exceed the amount established in the attributions regime.

4.2. Purchase management

For the Strategic Supply Department to begin purchasing negotiation, the following requirements must be met, under the exclusive responsibility of the user Department:

- Existence of a purchase requirement duly made within the strategic supply portal and authorized by whoever corresponds according to the current attribution regime.
- Inclusion in the requirement, as an affidavit, of the assigned budget and, if not, the corresponding authorizations according to the current Attribution Regime.
- In the event that Strategic Supply detects that a requirement does not have an assigned budget, to carry out the contracting it will require the authorization of: a) User Manager, b) User Senior Manager c) Operations and Central Services Manager d) CEO of the applicant Company. When the requirement exceeds one million dollars, the approval of the CEO of Grupo Supervielle and the CFO must be added.
- Existence of a detailed analysis; when applicable, draft approval by the investments forum; approval according to the importance of the purchase or investment; validity of the criteria

established at the time of the budget such as strategic priorities, profitability models, etc.

- Approval of the budget extension / reallocation of the same, if applicable according to the spending and investment policy.

4.3. Suppliers Homologation. Evaluation criteria

Each supplier that participates as a bidder in a tender or price check carried out by Grupo Supervielle will be evaluated according to the following evaluation criteria and, if its analysis is satisfactory, it will be considered an "Approved Supplier."

- Technical criteria to determine if the supplier meets the conditions to satisfactorily comply with the purchase or contracting of the goods or services requested.
- Economic Criteria that demonstrate the solvency and situation of the suppliers in the financial system.
- Sustainable Criteria that will consider the following aspects:
  - ✓ track record, reputation, social and environmental commitments,
  - ✓ background in the market,
  - ✓ adherence to the Code of Ethics and Integrity Program for the Prevention of Corruption of Grupo Supervielle or existence of own Codes and Programs,
  - ✓ verified that Grupo Supervielle is not their only client,
  - ✓ potential conflicts of interest will be evaluated.

4.4. Offers Evaluation

The Strategic Supply Department will carry out a comparative analysis of the offers received, which must be agreed with the area that requested the contracting and will decide based on the following considerations:

- At same quality of service offered, the tender will be awarded to the best price obtained.
- When there is a less than 5% difference between best offers, the Strategic Supply Department will negotiate with both suppliers to achieve an improvement in the price offered.
- When the purchase of goods or contracting of services is carried out to meet the requirements of Branches or Dependencies of Grupo Supervielle located in the interior of the country, procurement priority will be given to local suppliers, provided that similar conditions are respected in said procurements, in terms of price / quality / delivery terms.

4.5. Closing and award. Technical Evaluation Report

Once the bid evaluation process is finished and the Evaluation report has been generated, the Supply Department must carry out the respective process closing, informing the final decision of the purchasing process based on all the information collected.

Each purchase decision must be based on a Technical Evaluation report, as appropriate, a document that must clearly account for the process result and the final decision of Grupo Supervielle.

4.6. Offers Presentation

Bids submission may be made through:

- Electronic platform.
- The presentation of offers by suppliers approved by bids and / or price checks must be made through the electronic platform enabled for said process.
- Closed envelope.
- When impossible to send offers through the electronic Platform, it will be allowed to do so by sealed envelope. The opening of envelopes will be carried out in the presence of personnel from the Strategic Supply Department and a representative of the area requesting the purchase / service. Depending on the amount and item tendered, the presence of a notary public, the Head of the Operations and Central Services Department and personnel from other areas of Grupo Supervielle may be required as independent third parties, and a record of said envelope opening process may be drawn up.

CONTRACTS NOT REACHED BY THE STRATEGIC SUPPLY PERIMETER

5.1. Contracting Services by the CEO or Board of Directors

The CEO or the Board of Directors of Grupo Supervielle will have the power to contract services outside of the policies described here, provided that such contracts are strictly confidential. Notwithstanding, any contracting linked to these services must be authorized by the CEO of Grupo Supervielle and a member of the Board of Directors or two members of the Board of Directors.

5.2. Legal Services and Notaries

In the case of providers of "Legal Services," it will be necessary to implement a policy of opening to new providers in order to achieve a true competition framework. The management of said policy will the responsibility of the Chief Legal Officer and the CEO.

5.3. Alliances and commercial agreements.

In the event that Grupo Supervielle's Business Departments sign strategic alliances or commercial agreements, they must do so in accordance with the current policy of “Alliances and commercial agreements.” Updating of said Policy will be the responsibility of the "Commercial Alliances and Agreements Division."

All purchases of goods derived from these alliances and agreements must be channeled through the Strategic Supply Department.

5. CONTRACTS

6.1. Compliance

All contracts that bind Grupo Supervielle, according to this Policy, must have the express consent of the Legal Affairs Department and the Strategic Supply Department, with the exception of those established in item 5, which will not require the Strategic Supply Department´s agreement.

6.2. Validity

New contracts for the provision of services that are entered into as of the implementation of this policy, must have a validity of no more than three (3) years.

Exempt from this term are those contracts that are core / strategic, whose performance is essential, are key in the business line or their replacement requires a high monetary cost or excessive implementation effort.

The contracts entered into under these conditions must have the approval of the User Manager.

6. 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