GRUPO SUPERVIELLE



Compliance Policy of

Grupo Supervielle S.A.

December 22, 2017

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1. INTRODUCTION

The Compliance role is relevant at a local and global level by virtue of clients and regulators expectations that financial intermediaries carry out their activities within applicable regulatory frameworks and in line with the best local and international practices in the matter.

The Compliance Department responsibility will be to analyze, deepen and formalize the applicable procedures to risks that must be mitigated, and warn the Board of possible breaches on issues of their concern. It will promote the establishment of adequate systems and procedures that guarantee transparency of actions carried out in the related companies sphere, promoting training as a basic pillar for the development of any initiative.

2. MISSION AND INTEGRITY CULTURE

The Compliance Department mission will be to promote an integrity culture, best practices applicable to the financial sector and guarantee compliance with the applicable regulations within its scope, in order to prevent regulatory sanctions against the company and its Directors, material losses and reputational risk.

Grupo Supervielle promotes a true integrity culture. All Grupo Supervielle employees must act by doing the right thing, considering the following principles:

- Zero tolerance for corrupt practices.
- Correct performance in the markets in which Grupo Supervielle is present.
- Avoid the commercialization of products contrary to the needs of our customers or in a non-transparent way
- Implementation of policies that ensure business sustainability, generating a positive impact on governance, social responsibility and protection of the environment issues.
- Adequate management of risks inherent to Compliance to mitigate reputational risks that may affect Grupo Supervielle and its employees.

The Compliance Department will act as second line of defense for the related companies.

3. 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 and Corporate Governance Committee.

The Compliance Department will oversee executing this policy.

4. 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 may imply labour sanctions.

5. COMPLIANCE PROGRAM

The Program has the following pillars:

- Scope and Mandate
- Policies and Procedures
- Adequate Governance
- Risk Map
- Controls
- Training
- Audit / Annual Program Evaluation

The Compliance risk map must be reported and approved by the Risk Management Committee.

Compliance will have access to all the information it deems necessary to carry out its control task.

6. RISKS MITIGATED BY COMPLIANCE

Compliance must ensure Grupo Supervielle the management and mitigation of the risks mentioned below, constituting itself as the first line of defense in certain matters and as the second line of defense in others.

- **Risk of regulatory noncompliance and best practices**

This risk is assumed by companies by failing to comply with applicable regulations, both laws and rules as well as internal codes of conduct and good practices.

The Compliance Department will oversee reception and channeling of the regulation's implementation within its scope that affect any of the companies. Compliance will lead the implementation of all policies in this matter together with the area related to the subject.

Compliance will oversee carrying out the relationship with the National Securities Commission (Comisión Nacional de Valores) on issues related to Investor Protection.

- **Conduct Risk**

Grupo Supervielle may incur in this risk due to the actions of its employees to the detriment of customers or the market. The commercialization of products not suitable for our customers or based in non-transparent information is the focus of this risk. To avoid this risk, products approval process must be considered so that they are well designed, well sold and suitable for the customers to whom they are offered. To that end, Compliance will participate in the approval and monitoring of products and services.

Additionally, Compliance must be informed of complaints and claims, summaries and regulators procedures, complaints at the Consumer Defense office, lawsuits and Collective lawsuits.

- **Reputational Risk**

This risk is associated with changes in the perception of Grupo Supervielle or the brands that comprise it by stakeholders (customers, shareholders, employees, etc.)

The Compliance Department will be in charge of controlling the policies related to reputational risk, defined by the Ethics, Compliance and Corporate Governance Committee as: (i) anti-corruption programs, (ii) donations policy, (iii) political parties and governments relationship policy (iv) senior citizen policy; and will participate in the implementation of socio-environmental policies defined by the Risk Management Committee.

7. ETHICS & VALUES LINE

Any breach of the policies implemented by the Compliance Department may be reported to the Ethics & Values Line:

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

User: Supervielle
Password: Supervielle