

Code of Ethics and Conduct for Suppliers and Organizations



GENTERA®

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Message from Our CEO

Dear Suppliers and Organizations:

Genera is a group comprised of several companies and a foundation. Our purpose is to boost dreams by addressing our customers' financial needs with a human touch.

We believe that the company, regardless of its size or type, has not only a financial purpose but also a social purpose, acting as a means to become a resource through which the success of everyone who works and depends on it becomes possible.

In this regard, every company has the potential to be an agent of social change that respects the dignity of all people and promotes the common good. To this end, it is essential to create environments in which people act ethically and make a positive impact through their work, with their families, and in their communities, thereby creating social, economic, and human value - Integral Value.

We are committed to these ideals. They are part of our Philosophy and we convey them to our Suppliers and Organizations through this Code of Ethics and Conduct.

Today, you are part of a large value chain that enables us to fulfill our Purpose every day by serving our customers and collaborators with enthusiasm and responsibility.

Please take part in our Purpose, live by our Philosophy, and comply with conduct that strengthens the ethical culture that industry and society need to continually improve.

Sincerely

Enrique Majós Ramírez
CEO of Genera



The Code's Scope and Purpose

Ethics is the science that helps us distinguish between good and evil acts undertaken freely. Conduct is the set of free actions performed by a person¹.

At Genera, we recognize the importance of ethics in guiding our conduct, and based on this understanding—and inspired by our Philosophy—we instill in our collaborators the belief that acting ethically means recognizing the dignity of every person, caring for them, and through our decisions, contribute towards doing the greatest good possible for everyone.

This Code of Ethics and Conduct for Suppliers and Organizations (hereinafter "The Code") is intended for all of our suppliers of goods and services (hereinafter "Suppliers"), as well as civil society organizations² and centralized or decentralized government agencies (hereinafter "the Organizations") with which Genera or its companies³ establish a business or collaborative relationship. Compliance with this Code is mandatory, and our Suppliers and Organizations (including their directors, officers, and collaborators) are responsible for compliance with and ensuring compliance with all conduct described therein⁴.

This Code is a tool that provides the criteria and behaviors we use to build a values-based culture as well as the means by which we protect it. Through this code, we promote high ethical standards in order to preserve Genera's integrity and reliability, ensure legal compliance, protect our customers' interests⁵ and foster a fair and equitable work environment for everyone who works with or for our companies. It complies with the United Nations Universal Declaration of Human Rights, the standards of the International Labor Organization ("ILO"), and the applicable labor laws of the countries where we operate⁶.

In line with the above, this Code explores a non-exhaustive list of conduct; to put it another way, not every situation that could be considered an ethical conflict is addressed. In the event of a breach of this Code or of the regulations applicable to the provision of services by any Supplier or Organization, Genera reserves the right to suspend the existing contractual or collaborative relationship and will proceed in accordance with the terms set forth in the agreement entered into by the parties.

¹ See Rodríguez Nuño, A., General Ethics, Ediciones Universidad de Navarra (University of Navarra Press), Navarra, 2010, pages 20-22.

² Civil society organizations are groups formed by persons, based on associative ties, that may perform activities that defend and promote human rights, or provide support or assistance to third parties, without profit or partisan, political-electoral or religious proselytism. They do not seek personal gain, but rather the good of the community.

³ Genera S.A.B. de C.V., Compartamos Servicios, S.A. de C.V., Banco Compartamos, S.A. Institución de Banca Múltiple, Aterna, Agente de Seguros y de Fianzas, S.A. de C.V., Red Yastás, S.A. de C.V., Fundación Genera, A.C., Fin Útil, S.A. de C.V., S.O.F.O.M., E.R., Comfu, S.A. de C.V., Talento ConCrédito, S.A. de C.V., FinCremetar S.A. de C.V., Banco Compartamos, S.A. (Peru), Aterna Corredores de Seguros S.A., for Pagos Digitales Peruanos S.A. and Comfu Perú S.A.C., as well as any entities to be merged with, incorporated, or acquired in the future, which, collectively and for the purposes of this document, are referred to as Genera.

⁴ It should be noted that this Code is a supplementary regulatory document; therefore, in the event of a violation of the principles set forth herein, penalties established by applicable laws and competent courts may be applied.

⁵ We refer to all persons who receive a product or service from Genera as "customers". We use this term to refer to borrowers, issuers, commission agents, entrepreneurs, and/or users, depending on the business model of each of our companies.

⁶ In Mexico, we comply with the Federal Labor Act, the General Law on Women's Access to a Life Free of Violence, and the Model Protocol for Preventing, Addressing, and Eradicating Workplace Violence; as well as the General Labor Act and the Prevention and Punishment of Sexual Harassment Act in Peru.



Genera has monitoring programs and systems in place to detect conduct that violates this Code and to report such conduct to the Genera Ethics Committee if necessary. Should you have any questions regarding the interpretation of this Code, the Complaint Monitoring Department will address and resolve such issues through the institutional Speak up line.

Introduction

This Code is divided into five chapters that reflect the main areas in which we seek to foster and strengthen an ethical culture, setting forth the expected standards of conduct for Suppliers and Organizations that work with us in any way:

- 1. Our Philosophy.**
- 2. Conduct with Genera.**
- 3. Conduct with Our Customers.**
- 4. Conduct with Society.**
- 5. Speak Up Line.**

We begin by providing an overview of our people-centered Philosophy, as it is the foundation and inspiration for our ethical culture. We then outline the conduct we expect from Suppliers and Organizations in the various areas where their actions make an impact, first on Genera, then on our customers, and finally on society. In the fifth chapter, we provide the channels through which Suppliers and Organizations can report breaches of our standards of conduct and work with us to preserve the integrity of all our actions.



CHAPTER I

Our Philosophy



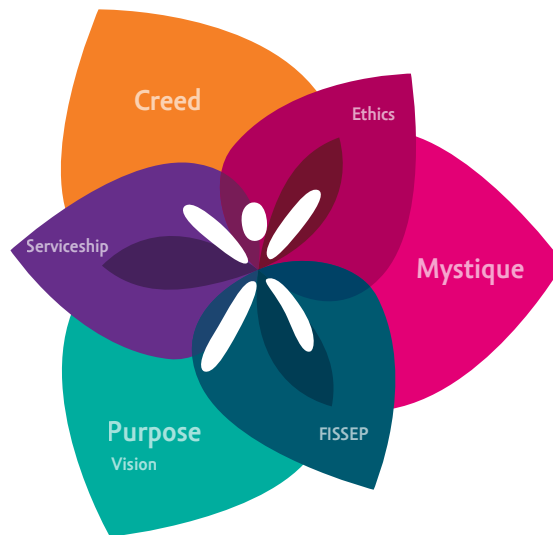
CHAPTER I:

Our Philosophy

It is how we think and act. It gives us a sense of transcendence and encourages us to be happy and fulfilled. It commits us to continually strive to be the best version of ourselves, thus creating value for our clients through a business model focused on the person and their needs.

Therefore, it is important to us that everyone who is part of our value chain (our collaborators, Suppliers and Organizations) understands and is committed to these principles, which guide our daily actions.

Our Philosophy is represented with a flower whose petals symbolize each of its elements, and places the Person at its center:



Here are its three fundamental elements:

Our **Purpose** is "To boost dreams" and we do so by realizing our Vision: "Solving our customers' financial needs with a human touch."

Our **Creed** that expresses the deep convictions that guide our daily actions, no matter where or when we find ourselves:

1. We believe in the person and in their capacity to improve in order to be better.
2. We believe that acting ethically is recognizing the dignity of every person, caring for them, and through our decisions, contribute towards doing as much good as possible for everyone, and we strive to put this into practice in our lives.
3. We believe that exclusion is a cause of poverty, and that by providing access to competitive, high-quality financial solutions, we create inclusion and development.
4. We believe in using business principles to help solve social issues.
5. We believe that, in the right context, profitability is the driving force behind development and the creation of competitive and efficient industries.



6. We believe there is a space where social, economic, and human values coexist and reinforce one another.
7. We believe in sustainable development and protecting the environment.
8. We believe in "Serviceship" as a leadership style based on serving others, which inspires and is meaningful through serving, training, growing and delivering results.
9. We believe that we should aspire to inspire and transform, even though the challenge is enormous.

Finally, we promote our **Mystique**, which is "living out our institutional values," so that we can become better every day:

- **Person:** is at the core of our values.
- **Service:** Giving ourselves to others because we care about their well-being.
- **Teamwork:** Working with others to achieve more.
- **Accountability:** Keeping our word and assuming the consequences of our actions.
- **Passion:** Loving everything we do.
- **Profitability:** Doing more with less to better serve others.

This philosophy inspires our ethical conduct and guides the way we seek to do the greatest possible good under any circumstance. It serves as the foundation for the conduct promoted by this Code of Ethics and Conduct.

Below, we outline the conduct Gentera expects from Suppliers and Organizations working toward the common good. Please put it into practice and, when necessary, use our Speak Up Line to ask questions or clarify any concerns you may have about this Code, or to report any breaches of its provisions by any of our collaborators.



CHAPTER 2

Conduct with Gentera

**CHAPTER 2:**

Conduct with Gentera

Integrity in Our Relationships

In order to establish upstanding relationships, Gentera's Suppliers and Organizations must act in accordance with the following criteria:

- 1.** Communicate with our collaborators, customers, and/or customers' family members, whether formally or informally, in a dignified, respectful, informative, and honest manner consistent with our Philosophy, so that our interactions cannot be mistaken for sexual harassment or for inappropriate familiarity that is out of place or inconsistent with the professional relationships we seek to establish.
- 2.** Provide Gentera with fair, transparent, honest, and equitable treatment, always seeking to benefit both parties.
- 3.** Under no circumstances shall you use intimidating tactics against any person to compel compliance with an agreement, arrangement, payment, methodology, or service in favor of Gentera or a third party.
- 4.** Identify and report to Gentera any risks arising from its internal operations that could have a financial impact, as well as those that could affect or jeopardize its reputation, legal compliance, or operations.
- 5.** Notify us if you are aware of any situation that could be considered a conflict of interest when conducting any transaction with Gentera or its companies.

Use of Assets and Services

To prevent the improper use of our assets and services, including but not limited to the following, Suppliers and Organizations must refrain from:

- 1.** Using the tools provided by Gentera, in whole or in part, in a negligent or abusive manner, in a way that results in waste and unnecessary expenses; using them in a way that violates moral standards and good customs; using them for pornographic purposes; using them in a way that tarnishes Gentera's reputation or brands; using them to engage in illegal activities; or causing harm to the environment. Such tools may include, but are not limited to: computer equipment, telephones, cell phones, tablets, email services, institutional email accounts, Internet services and printing services. Persons authorized by Gentera may access these tools at any time and in any way, and Gentera may use any kind of information or content found in them. The above is always subject to compliance with applicable information security and personal data protection laws.
- 2.** Share or rent tools provided by Gentera to third parties.
- 3.** Provide Gentera's collaborators, prior to entering into an agreement or collaboration arrangement, technological equipment or software of any kind for testing purposes, except when required by Gentera's operations, and provided that it complies with the relevant Procurement Policy. If it happens after an agreement or collaboration agreement has been entered into, such documents must specify the terms of use, period, and purpose.



Conflicts of Interest

There is a conflict of interest when our interests, or those of our families⁷, make it difficult for us to make decisions or act efficiently and objectively, as this may lead others to believe that our personal interests take precedence over Genera's interests.

Even if there is no actual or potential conflict of interest, if others perceive that there is one, they will doubt the ability of Suppliers or Organizations to act objectively; therefore, avoiding the appearance of a conflict of interest is almost as important as avoiding an actual conflict, since such a perception can damage the person's reputation as well as the Supplier's reputation, the Organization's reputation or Genera's reputation.

To prevent any conflict of interest, Genera's Suppliers and Organizations (including their directors, officers, and collaborators) must at all times avoid acting in any way that may conflict with, or appear to conflict with, Genera's legitimate interests. Particular care must be taken to assess the possibility of a conflict of interest arising from any business or personal relationship you may have with Genera's directors, officers, collaborators, or competitors.

Any situation that constitutes, or could give rise to, a conflict of interest must be avoided and reported immediately by email to conflictodeintereses@genera.com.mx, and follow Genera's internal policies to avoid it.

To avoid actual, potential, or apparent conflicts of interest, Suppliers and Organizations are prohibited from, among other conduct, the following:

1. Offering, providing, or sending any type of gratuity, gift, discount, hospitality, handout, trip, or favor to Genera's directors, officers, and collaborators, as well as their family members, whether electronically or in person, to their private residences or to Genera's facilities and those of its companies. Any act of this nature will be considered an attempt to influence their decisions.
2. Receiving or accepting any gift, gratuity, handout, or favors from our directors, officers or collaborators to serve their personal interests.
3. Giving or receiving personal loans from board members, officers and Genera collaborators, whether in cash or in kind.
4. Engaging in activities that cause a conflict or prevent you from meeting your Genera objectives as Suppliers and Organizations.

In addition to the aforementioned points, Suppliers and Organizations that provide services or implement projects for Genera using external personnel must consider the following:

1. They may not be contracted if their shareholders or partners, members of the Board of Directors, statutory auditors, legal representatives, executives, or collaborators are related (by blood or marriage up to the second degree, that is: parents, grandparents, siblings, children, grandchildren, spouse,

⁷ Family: These are people who are related to one another (up to the fourth degree) in the following cases: by blood: father, mother, grandparent, child, sibling, half-sibling, grandchild, aunt or uncle, cousin, nephew or niece. By marriage: spouse, common-law spouse, partner in a common-law marriage, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, son's or daughter's in-laws, brother- and sister- in-law's spouse, stepfathers, and stepmothers. When we use the term "family" or "family members" at Genera, we also include friends or people who share an emotional or friendly bond but are not related by blood or marriage, such as: boyfriend, girlfriend, your godfather, your godmother, godchild, your child's godfather, your child's godmother, among others.



parents-in-law, grandparents-in-law, or brothers- or sisters-in-law) to any collaborator in Gentera's management requesting your service or project, nor when they subcontract the entire service or project using another company. If subcontracting is necessary, such Supplier or Organization must ensure that the subcontractor complies with this Code, Gentera's policies and procedures, and all applicable laws and regulations in all cases.

2. Suppliers will not be contracted, nor will partnerships be formed with Organizations if their shareholders or partners, members of their Board of Directors, statutory auditors, legal representatives, executives, and/or service or project leads are former Gentera collaborators, unless at least one year has elapsed since the termination of their employment relationship with any of our companies and their Gentera employment relationship was not terminated due to conduct that constituted a breach of the Code of Ethics and Conduct, applicable laws, misappropriation or misuse of Gentera's assets, reputation and trademarks, or caused any harm to its customers.

Fraud

At Gentera, fraud is defined as a situation in which a person intentionally and through deception abuses the trust that Gentera has placed in them and/or their job responsibilities to obtain a benefit for themselves or a third party, thereby causing or potentially causing a financial loss or harm to the company and/or to anyone with whom it has a relationship (customers, collaborators, partners, subsidiaries, among others).

This includes, but is not limited to the following actions that Gentera's Suppliers and Organizations are not allowed to do:

1. To facilitate transactions involving funds of likely illicit origin through Gentera.
2. To distort, alter, falsify, or manipulate the information underlying an offer or proposal, records, transactions, accounting information, invoices, budgets, or any document, receipt, or request.
3. Falsifying or altering Gentera collaborator or customer information, such as their handwritten signatures, fingerprints, personal information, financial information and sensitive information.
4. Misusing Gentera information, information about its companies, customers, and/or collaborators for personal gain or to benefit a third party.
5. Posing as legitimate companies with fake certifications in order to carry out illegal activities.
6. Hiding or downplaying problems and/or violations related to your products or services.
7. The marketing of products or services that do not meet expectations through the use of manipulative tactics.

Information Handling

Suppliers and Organizations are required to treat as confidential and/or secret all information they become aware of, directly or indirectly, in connection with the services, projects, duties, or participation they execute with Gentera, and agree not to use, disclose, publish, disseminate, transmit, share, obtain, copy, or extract it, unless strictly necessary for the performance of their services or projects, and always in compliance with applicable laws, internal policies, and Gentera's express authorization; furthermore, they may not share it with third parties who are not legally authorized to have access to it⁸.

⁸ The disclosure of information is limited solely to the competent authorities as ordered by a judge with jurisdiction over the matter, in accordance with applicable legal provisions, subject to prior authorization from the Legal Department, or to comply with legal regulations issued by the regulatory authority.



This includes, but is not limited to, the following confidential and/or secret information, regardless of the media in which it is found, whether in electronic, printed, or any other form:

- 1.** Information regarding the financial, banking, accounting, tax, or commercial transactions of the holders of the personal data related to Gentera and its companies.
- 2.** Gentera's information or data, formulas, methodologies, product and service features and specifications, plans, policies, trademarks, databases, and marketing or business strategies.
- 3.** Techniques, policies, plans, strategies, procedures, projects, forecasts, estimates, methods, processes, systems, and technology created, developed, registered, patented, and/or used by Gentera.
- 4.** Results of analyses, tests, forecasts, and new projects of any type or nature.
- 5.** Computer, Internet, or software programs, as well as products, devices, procedures, tools, or software systems owned by Gentera or licensed for use by Gentera.
- 6.** Gentera's compensation policies, salaries, and pay scales.
- 7.** Information or content from Gentera's agreements, negotiations or arrangements.
- 8.** Gentera's accounting, financial, tax, legal, strategic, or business information.
- 9.** Information that may be considered one of Gentera's trade secrets.
- 10.** Information that would enable Gentera to gain or maintain a commercial, competitive, economic, or business advantage over third parties.
- 11.** Any type of database, policy, code, guideline, arrangement, protocol, regulation, provision, agreement, or internal rule created by Gentera.

Suppliers and Organizations may not engage in the following conduct, among others:

- 1.** Disclosing any news or information regarding Gentera's customers, directors, officers or collaborators or news or information regarding Gentera's other Suppliers or Organizations.
- 2.** Providing explicit information about the operations or activities performed at Gentera, as this information may not be disclosed to third parties without Gentera's consent.
- 3.** Disclosing any false, biased, or confidential information that could affect Gentera.
- 4.** Using Gentera's trademarks or logos for any external communication or to advertise oneself.

Under all circumstances, Suppliers and Organizations have a paramount obligation to protect the name, brand, and image of Gentera, as well as those of the institutions and companies with which they have business, collaborative, donation, or partnership relationships.



CHAPTER 3

Conduct with Our Customers

**CHAPTER 3:**

Conduct with Our Customers

Our Commitment to Customer Protection

For all of us who work at Gentera, the person comes first, and we are here for our customers. That is why they are at the heart of everything we do. We recognize that they are persons with aspirations, abilities, and life plans, which is why we strive to ensure that our products and services contribute to their development and the well-being of their families and communities. We protect them in our daily work, as we safely, responsibly and fairly provide inclusive financial services.

To provide responsible financial services, it is essential for Gentera to follow eight principles. Please familiarize yourself with them:

- 1. Suitable Products and Services:** We design and offer products and channels that meet our customers' different needs and specifications.
- 2. Preventing Debt Overhang:** We analyze customer information to determine their ability to pay; by adhering to established policies and procedures, we strive to prevent our customers from having excessive debt.
- 3. Transparency:** We clearly and accurately provide our customers with prices, terms and conditions in a timely and sufficient manner, using plain language, so they can make informed decisions.
- 4. Fair and respectful treatment of customers:** We respect the dignity of our customers and their families at all times, conducting ourselves ethically and providing them with personalized, warm, and excellent service.
- 5. Reasonable Prices:** We ensure that our prices and terms are fair and affordable for our customers, allowing the company to remain sustainable.
- 6. Customer Data Privacy:** We protect customer data in accordance with the standards and legal requirements established by banking secrecy laws and by Mexico's Federal Act on the Protection of Personal Data Held by Private Parties, as well as the relevant laws in force in Peru.
- 7. Complaint Resolution Procedures:** We inform customers of the appropriate channels for submitting their complaints or comments, which will be managed and resolved in a timely manner through a responsible institutional system equipped with efficient monitoring procedures and controls.
- 8. Gentera's Corporate Governance Committed to Customer Protection:** We make strategic decisions by assessing the potential impact on people's dignity, their context, as well as on our customers' social and financial data. Corporate Governance and Senior Management coordinate efforts to ensure an ethical and sustainable relationship among our customers, collaborators, and business results.

In line with this protection commitment that we have made, Suppliers and Organizations must act in accordance with it as it applies to the services or projects they carry out, and must respect the rights and obligations of Gentera's customers, partners, or commission agents at all times.

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CHAPTER 4

Conduct with Society

**CHAPTER 4:**

Conduct with Society

Human and Labor Rights

Suppliers and Organizations must respect fundamental human rights, as internationally recognized in the Universal Declaration of Human Rights, and promote compliance with these rights throughout their value chain. Therefore, Suppliers and Organizations must comply with the following principles:

- 1.** Free choice of employment. We reject the use of involuntary labor, prison labor, debt labor, or forced labor, as well as slavery or any form of servitude.
- 2.** Fair Treatment. Suppliers and Organizations must provide their collaborators with a work environment free from violence, inhumane treatment, or any form of psychosocial abuse.
- 3.** Child and Youth Workers. In accordance with the standards of the International Labor Organization and the Ten Principles of the United Nations Global Compact, we reject child labor, as well as all forms of forced or compulsory labor.
- 4.** Diversity and Inclusion. Employers and organizations must provide a workplace free from any form of discrimination or exclusion based on race, nationality, sex, age, physical characteristics, social background, disability, union membership, religious affiliation, marital status, pregnancy, sexual orientation, gender identity, gender expression, or any other reason (in accordance with Article 1, Section III, of the Federal Discrimination⁹ Prevention and Elimination Act, and Peru's Law Against Acts of Discrimination No. 27270).
At Gentera, we value diversity¹⁰, recognizing the contributions we can all make to achieve our goals and maintain healthy relationships with Suppliers and Organizations.
- 5.** Salaries, benefits, and work schedules. Suppliers and Organizations must ensure compliance with applicable local laws so that their collaborators work no more than the maximum number of hours allowed, receive compensation that allows them to maintain an adequate standard of living, and enjoy safe and healthy working conditions during their daily activities.
- 6.** Freedom of association. In accordance with applicable local laws, Suppliers and Organizations shall respect their collaborators' rights to freely associate, join unions, seek representation, serve on committees, and participate in collective bargaining without fear of retaliation.

⁹ In accordance with said act and for the purposes of this Code, discrimination shall be understood to mean any distinction, exclusion, restriction, or preference based on ethnic or national origin, skin color, sex, gender, gender expression, age, disability, social or economic status, physical or mental health conditions, religion, opinions, political identity or affiliation, physical appearance, sexual orientation, marital status, pregnancy, or language, or any other reason that violates human dignity or has the purpose or effect of nullifying or undermining the rights and freedoms of persons.

¹⁰ In compliance with Gentera's equality and non-discrimination policies, in accordance with the provisions of MPE-05, Labor Equality and Non-Discrimination Policy.



Relationship with the Environment

In addition, Suppliers and Organizations, in accordance with the scope of their activities, must:

1. Comply with local environmental legislation, regulations, and laws to help protect the environment.
2. Have a process in place to ensure compliance with local regulations regarding waste management, recycling, and disposal, as well as the handling of hazardous materials.
3. Monitor their emissions and hazardous waste to identify opportunities to reduce them.
4. Find ways to contribute to the recycling and reuse of products and materials used.
5. Take responsibility for any action or omission that harms the environment and diligently remedy the situation.
6. Promote the use of environmentally friendly technologies.

Corruption

Corruption can take various forms of conduct and situations; however, generally speaking, it consists of offering, promising, giving, accepting, or requesting an improper benefit of any value (which may be financial or non-financial in nature), directly or indirectly, in violation of applicable law, as an incentive or reward for a person to act or refrain from acting in connection with the performance of that person's duties.

It is a serious offense in any setting and under any circumstance, which is why at Gentera we have a zero tolerance policy toward any act of corruption and reject it completely and unconditionally, as we are firmly committed to conducting business ethically to maintain the trust of everyone around us. We recognize that transparency in our relationships with others is not enough; rather, a constant fight against corruption in all its forms is necessary.

This includes, but is not limited to, Gentera's Suppliers and Organizations refraining from engaging in the following corrupt practices at all times and in any way:

1. **Bribery:** is the direct or indirect offering, promise, authorization, or acceptance of any improper monetary handout or any other improper benefit to obtain or retain business or any other improper benefit for Gentera or for any other person.
2. **Extortion:** is the demand for a bribe or payment, whether or not it is accompanied by a threat in the event of refusal to comply with the demand. Gentera rejects any attempt at extortion, whether direct or indirect, and urges Suppliers and Organizations to report such attempts through the Speak Up Line.
3. **Influence peddling:** is the offering or solicitation of an undue advantage for the purpose of exerting improper influence, whether actual or perceived, on a public official, with the intent to obtain an undue benefit or advantage for Gentera or for any other person.

Corrupt practices not only constitute a breach of this Code, but may also constitute a serious breach of civil, administrative, and criminal anti-corruption laws in the countries where Gentera operates.



The Ethics Committee is responsible for determining any disciplinary penalty based on the severity of the offense. Externally, the penalty will be determined in accordance with applicable laws by the respective authority.

Anti-Money Laundering and Anti-Terrorist Financing (AML and ATF)

Money Laundering and Terrorist Financing are serious crimes. The former is the process by which one attempts to hide, disguise, or conceal the origin of funds generated through an illegal activity, with the aim of making them appear legitimate; and the latter consists of the contribution, financing, or collection of funds intended to cause alarm, fear, or terror among the population through the use of threats or violence by persons or groups against people or sectors of society, with the aim of forcing governments or political entities to respond to political, social, or religious demands.

To combat them, Genera has a department specializing in these matters, called "Anti-Money Laundering and Combating the Financing of Terrorism," which is headed by the Compliance Officer. This department is responsible for conducting reviews or, as needed, requesting supporting documentation from all persons or legal entities seeking to enter into a contractual relationship with Genera or any of its companies, as well as ensuring that the Organizations with which it has a relationship fully comply with applicable laws regarding Anti-Money Laundering and Anti-Terrorist Financing, and, through its Speak Up Line, handles reports from Genera collaborators regarding any Unusual Transactions, Internal Transactions of Concern, or Suspicious Transactions they identify.

Suppliers and Organizations that have a relationship with Genera must ensure that they are familiar with, correctly apply, and comply with laws related to Anti-Money Laundering and Combating the Financing of Terrorism, and International Penalties.



CHAPTER 5

Speak Up Line

**CHAPTER 5:**

Speak Up Line

These are the channels through which Suppliers and Organizations can report a breach of our standards of conduct. Processing complaints through institutional channels ensures their absolute confidentiality. Gentera's Complaint Monitoring Department is responsible for assuring whistleblowers that information obtained from each complaint is handled confidentially, ensuring the corrective actions for each one, conducting an appropriate investigation into each reported incident, and implementing any necessary anti-retaliation measures, in accordance with our *Institutional Guidelines for the Protection of Whistleblowers*, while respecting the dignity of people at all times.

Before making any inquiry or filing any complaint regarding the Code, we must take the following considerations into account:

1. Think things through carefully before acting and assess whether our perception of the facts is correct.
2. Refer to this Code of Ethics and Conduct to determine which provision is being violated.
3. Proceed with confidence, communicating our decision through the institutional Speak Up Line.
4. Provide information pertaining to the time, manner, and place of the incident, as well as evidence, witnesses, and details that you have obtained on your own, without coercing a third party and without engaging in any actions that could constitute a crime.
5. Maintain strict confidentiality. Do not discuss our contact with the Speak Up Line with anyone, as this could jeopardize the safety of those involved, the confidentiality of the matter, and the investigation process.

We know that honesty is a very important value, so complaints must be reported in an objective, well-founded, and substantiated manner, providing sufficient evidence to prove the reported incident¹¹.

As a Supplier or Organization that works with Gentera, you can use our Speak Up Line:

- Correo:
 - **México:** denuncia@lineaetica.info
 - **ConCrédito:** denunciacc@lineaetica.info
 - **Perú:** denunciacf@lineaetica.info
- Teléfonos (las llamadas son gratuitas, los 365 días del año, las 24 horas del día):
 - **México:** 800 230 6363
 - **Perú:** 705 2233

¹¹ In Mexico, the Ministry of Labor and Social Welfare requires companies to comply with standard NOM-035-2018, ensuring that filed complaints are supported and followed up on, and that each one is processed confidentially.



- WhatsApp (disponible los 365 días del año, las 24 horas del día):
 - **(+52) (55) 6538 5504**
- Página web:
 - **México:** <https://denuncia.lineaetica.info/>
 - **ConCrédito:** <https://denunciacc.lineaetica.info/>
 - **Perú:** <https://denunciacf.lineaetica.info/>

You'll find on each website a live chat with personalized support, as well as instructions for downloading and using the mobile app Ethics Global (Global Ethics) for our companies in Mexico or Peru, as applicable.

Commitment Letter

Gentera's Code of Ethics and Conduct for Suppliers and Organizations

I, _____, legal representative
of _____, hereby certify that I
have received, read, and fully understand the content, scope, and effect of each of the guidelines set
forth in Gentera's Code of Ethics and Conduct for Suppliers and Organizations ("the Code") in force
as of the date of this document. Therefore, by accepting this Letter of Commitment, I hereby declare
that it is my intention and commitment to always comply with the Code's guidelines. I understand
and acknowledge that, through it, Gentera seeks to build meaningful relationships and to strengthen
respect for and compliance with applicable laws.

I will also share this Code with the collaborators of the organization I represent so that they are aware
of the criteria and conduct we must follow while working with Gentera.

Having read and understood the content, scope, and effects of this Letter of Commitment and
the Code, I hereby express my agreement and acceptance on _____,
_____ at _____.

I agree.
Name and signature of the legal representative



Appendix 1: Comprehensive Privacy Notice for Suppliers Gentera Businesses

Based on the Federal Law on the Protection of Personal Data Held by Private Parties, we hereby inform you that GENTERA S.A.B. de C.V. (hereinafter, "GENTER") and its subsidiaries (Controladora AT, S.A.P.I. de C.V.; ATERNA Agente de Seguros y de Fianzas, S.A. de C.V.; Banco Compartamos S.A., Institución de Banca Múltiple; Compartamos Servicios, S.A. de C.V.; Red Yastás, S.A. de C.V.; Fin Útil, S.A. de C.V. SOFOM E.R.; Talento ConCrédito, S.A. de C.V.; Comfu, S.A. de C.V.; and FinCremmentar S.A. de C.V.) and Fundación Gentera A.C. (hereinafter, "Fundación Compartamos"), with address at Insurgentes Sur number 1458, 7th floor, Colonia Actipan, Alcaldía Benito Juárez, C.P. 03230, Mexico City, Mexico, are responsible for the use and protection of your personal data. In this regard, we inform you as follows:

What purposes will we use your personal data for?

The personal data we collect from you will be used for the following primary purposes, which are necessary for our contracting process:

- Certify you as a supplier.
- Retain your information for compliance with legal provisions and requirements from various authorities and/or regulatory entities.
- Comply with customer due diligence and anti-money laundering provisions.
- Comply with the provisions of the service agreement during the term of the contractual relationship.
- Comply with and monitor internal regulations and potential reported fraud.
- Manage payment for the contracted services/products.
- Identify you and verify your identity.
- Compile and update your file.
- Contract the services/products;
- Record the information and keep our database up to date.
- Validate the accuracy of the data you provide; and
- Video surveillance for your safety and the safety of persons visiting our facilities.

Additionally, as secondary purposes, we will use your personal data categorized as Identification, Contact, Address/Residence, Employment and Financial/Asset-related data for the following purposes, which are not necessary to carry out or maintain the contractual and/or commercial relationship, but allow us to carry out "Supplier Sustainability":

- Invite you to participate in our surveys and obtain your opinion; and
- Prepare statistics and conduct information analysis.

If you do not wish your personal data to be processed for the additional purposes indicated in this privacy notice, you may, from this moment, express your refusal through the website www.gentera.com.mx under the Privacy Notices/ARCO Rights section. Refusal to allow the use of your personal data for the secondary purposes may not be grounds for limiting or terminating the contractual/commercial relationship.



What personal data will we use for these purposes?

To carry out the purposes described in this privacy notice, we will use the following personal data collected directly from the Data Subject:

- Identification: Name, Tax Identification Number (RFC), Unique Population Registry Code (CURP), identification number, place and date of birth, age, nationality, gender, marital status, photograph, handwritten signature, Social Security Number, driver's license number;
- Contact: Telephone number (landline and mobile), personal and work email address;
- Address/Residence: Home address;
- Employment: Occupation and specific activity; and
- Financial/Asset-related: Account statements and/or account number, credit history, income, expenses, credit bureau information, insurance and surety bonds.

Please be advised that, in accordance with the provisions of this privacy notice, GENTERA will not request personal data considered sensitive under the Federal Law on the Protection of Personal Data Held by Private Parties. The processing of your personal data will be carried out based on the principles of lawfulness, data quality, consent, information, purpose limitation, fairness, proportionality and accountability described in the Federal Law on the Protection of Personal Data Held by Private Parties.

Your personal data and sensitive personal data will be maintained and processed under strict security and confidentiality measures in order to prevent damage, loss, alteration, destruction or unauthorized use.

Use of cookies and/or web beacons

We inform you that our platform uses cookies. The data collected through this technology are: user ID, session ID, region from which access is made, browser information, operating system information, date and time of the beginning and end of the session, websites visited, searches performed, and advertising viewed. The purpose for which the data are collected is to provide you with better browsing experience on our platforms. These technologies and/or location data may be disabled by following the respective procedures for each browser; however, you should bear in mind that disabling them could limit the functionality offered by our platforms:

For more information about these technologies, you may consult the following addresses:

- <https://support.google.com/accounts/answer/61416?hl=es-419>
- <https://windows.microsoft.com/es-mx/windows-vista/block-or-allow-cookies>
- <https://support.mozilla.org/es/kb/habilitar-y-deshabilitar-cookies-sitios-web-rastrear-preferencias>
- <https://support.apple.com/es-mx/guide/safari/sfri11471/mac>

We inform you that, as a result of the processing of personal data related to this privacy notice, web beacons are not used.



With whom do we share your personal data and for what purposes?

We inform you that your personal data will not be shared with domestic and/or international third parties; however, pursuant to Article 36 of the Federal Law on the Protection of Personal Data Held by Private Parties, your personal data may be transferred to third parties without obtaining your consent when this occurs solely under any of the following circumstances: (i) it is provided for in a Law or Treaty to which Mexico is a party; (ii) it is necessary for the prevention or medical diagnosis, the provision of healthcare, medical treatment or the management of healthcare services; (iii) it is made to companies controlled by, subsidiaries of, or affiliates under the common control of GENTERA and/or Fundación Compartamos and that operate under the same internal processes and policies; (iv) it is necessary by virtue of a contract entered into or to be entered into in your interest by the Controller and a third party; (v) it is necessary or legally required for the safeguarding of a public interest, or for the administration or enforcement of justice, or to comply with the requirements of the relevant authority; (vi) it is necessary for the recognition, exercise or defense of a right in a judicial proceeding; and (vii) it is necessary for the maintenance or fulfillment of the legal relationship between any of the GENTERA companies and you.

If transfers of your personal data other than those described above are required, we will request your prior consent.

Recipient of the Personal Data	Purpose
Authorities and Regulatory Entities	To comply with information requirements requested by various authorities and/or regulatory entities.

How can you access, rectify or cancel your personal data, or object to its use – ARCO Rights?

You have the right to know what personal data we have about you, what we use it for and the conditions under which we use it (Access). Likewise, you have the right to request correction of your personal data if it is outdated, inaccurate or incomplete, attaching documentation supporting your request (Rectification); to have it deleted from our records or databases when you consider that it is not being used in accordance with the principles, duties and obligations established in applicable regulations, or when the purpose for which it was requested has been fulfilled (Cancellation); as well as to object to the use of your personal data for purposes other than those that are necessary (primary purposes) and that give rise to the legal relationship you have with us (Opposition). These rights are known as ARCO Rights.

For a request to exercise your ARCO Rights, the requesting person must be the Data Subject or their legal representative and, in both cases, their identity must be documented (Voter Credential, Passport, Military Service Card, Professional License). If there is a legal representative, the



representative's identity and authority must be established, attaching the corresponding documents (Public Instrument: Notarial Power of Attorney, Statement made in the personal appearance of the Data Subject, or, where applicable, Power of Attorney letter signed before two witnesses).

In addition to documentation evidencing identity and authority, a clear and precise description of the personal data with respect to which any of the aforementioned rights is sought must be provided and, where applicable, any other element or document that facilitates the location of the personal data. The documentation required according to the right to be exercised and under the terms provided by the Federal Law on the Protection of Personal Data Held by Private Parties must also be considered. To exercise any of your ARCO Rights, you must duly complete the "ARCO Rights Request" made available through our website www.gentera.com.mx under the Privacy Notices/ARCO Rights section, indicating, among other matters, the means by which you require us to respond to your request.

How can you revoke your consent to the use of your personal data?

You may revoke the consent you have granted us for the processing of your personal data, without retroactive effect. However, for those purposes that are necessary (primary purposes) and give rise to the legal relationship you have with us, we may not be able to honor your request or discontinue the use immediately, since we may be required by law to continue processing your personal data. To revoke your consent, you must duly complete the "ARCO Rights Request" made available through the website www.gentera.com.mx under the Privacy Notices/ARCO Rights section, indicating, among other matters, the means by which you require us to respond to your request.

Process, response times and questions regarding the exercise of ARCO Rights and Revocation of Consent.

For purposes of this privacy notice, an Information Privacy Officer has been designated to coordinate the handling of requests related to your ARCO Rights (Access, Rectification, Cancellation and Opposition), as well as revocation of consent and other matters related to the processing of data.

The Information Privacy Officer will verify that the information provided by the Data Subject is sufficient and complete. If the request meets the requirements, the period for issuing a resolution is 20 (twenty) business days from the date the request is received. Pursuant to the Federal Law on the Protection of Personal Data Held by Private Parties, this period may be extended once for an equal period, provided that the circumstances of the case are so justified.

If the information provided in the request is insufficient or incorrect, or if the necessary documents are not attached, the Information Privacy Officer may request the necessary information and/or documentation within a period not exceeding 5 business days. You will have 10 business days following receipt to provide it; otherwise, your request will be deemed not to have been submitted. If the resolution is favorable, we will notify you and respond within the following 15 business days. This period may also be extended once for an equal period when justified by the circumstances of the case.



The format or means by which you may obtain the information or personal data requested through the exercise of the Access right consists of simple copies, electronic documents or any other means selected in the "ARCO Rights Request".

For questions regarding the procedure and requirements for exercising ARCO Rights and Revocation of Consent, you may contact the Information Privacy Officer, who will process requests and address questions regarding the processing of your information. The contact details are:

- Authorized person responsible for providing assistance: Information Privacy Officer.
- Address: Insurgentes Sur number 1458, Ground Floor (GENTERA and/or Fundación Compartamos Reception), Colonia Actipan, Alcaldía Benito Juárez, C.P. 03230, Mexico City, Mexico.
- Email: oficialdeprivacidad@gentera.com.mx

How can you limit the use or disclosure of your personal data?

To enable you to limit the use and disclosure of your personal data, you may enroll in our exclusion list, which is intended to record your refusal to the processing of your personal data for marketing and advertising purposes. You may do so through the "ARCO Rights Request" made available through our website www.gentera.com.mx under the ARCO Rights/Privacy Notice section.

How can you learn about changes to this privacy notice?

This privacy notice may be subject to modifications, changes or updates arising from new legal requirements; changes to our processes or services; changes to our privacy practices and/or changes to our business model. We undertake to keep you informed of any changes to this privacy notice through our website www.gentera.com.mx, under the Privacy Notices section.

The procedure through which notifications regarding changes and/or updates to this privacy notice will be made is as follows:

- Publication of banners on the GENTERA and/or Fundación Compartamos website notifying users of changes and/or updates to this privacy notice.
- Once the change and/or update has been published through the aforementioned means, it will become effective on the day following its publication.

To learn which companies are part of GENTERA, you may visit the website www.gentera.com.mx.



This Code of Ethics and Conduct for
Suppliers and Organizations was approved by the
Gentera Board of Directors on July 22, 2026.