



Strategic Environmental, Social and Governance (ESG) Policy

May 2023

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Objective

To establish the general principles of action of Gentera S.A.B de C.V. (“Gentera”) and its companies in environmental, social and governance matters in accordance with the sustainable development objectives approved by the United Nations on its 2030 agenda, as well as the commitments that promote compliance with Human Rights aligned commitments to international environmental standards and initiatives.

Reach

This policy is relevant to all Gentera, its companies, employees, suppliers, clients, and companies that collaborate with Gentera in the countries where it operates.

Applicable regulations

- Law of the National Human Rights Commission Mexico
- Federal Labor Law of Mexico
- Law of Organization and Functions of the Ministry of Justice and Human Rights of Peru
- General Labor Law of Peru

Note: Current national and local legal, regulatory, and contractual requirements are considered, as well as the laws and regulations for the financial sector, applicable to Gentera and its companies, in the countries where we have operations.



Linked documents

- Code of Ethics and Conduct
- Code of Ethics and Conduct for Suppliers and Organizations
- Code of Ethics and Conduct for Civil Society Organizations (CSOs)
- PFG-02 Define the Strategy to Distribute the Social Responsibility Fund Resources
- MSIF-58 Administer Information Security and Privacy Awareness Program
- MPLD-09 Manual of Policies to Prevent and Detect Operations with Resources
- MPLD-01 Manual of Policies to Prevent and Detect Operations with Resources of Illicit Origin for Fundación
- MASUC-03 Manual of Internal Security Policies in Branches
- MAOS-01 Manual of Internal Security Policies in Services Offices and Offices with Integrated Branch.
- G-MSF-02 Manage Operational Security Services
- POIC 01 Prepare Annual Report
- PPE-24 Define Annual Training Strategy
- PPE-37 Follow up on Certifications and Recertifications in the Code of Ethics and Conduct
- PFR-01 Address possible Fraud Complaints
- PPE-01 Evaluate, Attract and Select Talent
- PPE-04 Determine Evaluation for Performance Bonus
- PPE-29 Manage Development Programs
- PPE-38 Update Code of Ethics and Conduct
- G-PCE-01 Give Attention to the Means of Complaints



Glossary

Term/ Acronym	Definition / Description
Workplace Harassment (mobbing)	Harassment is a form of workplace violence, whose objective is to intimidate, overshadow, humiliate, intimidate, or emotionally or intellectually consume the harassed person, with the aim of excluding him from the company or attacking, controlling, or destroying another.
ESG (Environmental, Social and Corporate Governance)	Identification, measurement, integration, and reporting of information on environmental, social, and corporate governance factors.
Supply chain	Sequence of activities or parties that provide products or services to an organization.
Value chain	<p>An organization's value chain encompasses the activities that convert an input into a product by adding value. Includes entities with which the organization has a direct or indirect business relationship and which supply products or services that add value to the organization's own products or services or receive products or services from the organization.</p>
Ethics Committee	<p>It is the governing body responsible for ensuring the promotion of an ethical culture in Genera and its Subsidiaries, made up of officers with high attachment, mastery and knowledge of our Philosophy, Code of Ethics and Conduct, human relations, anticorruption, human rights, ethics, internal institutional policies, and applicable regulations.</p>
Commitments	Set of rules that serve to control or regulate the different areas of civil coexistence.
Human rights	<p>Rights inherent to all human beings, without distinction of any nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other condition. We all have the same human rights without discrimination.¹</p>

¹ National Human Rights Commission (CNDH)

Term/ Acronym	Definition / Description
Discrimination	Discrimination shall be understood as any distinction, exclusion or restriction that, based on ethnic or national origin, sex, age, disability, social or economic condition, health conditions, pregnancy, language, religion, opinions, sexual preferences, marital status or any other, has the effect of preventing or nullifying the recognition or exercise of the rights and real equality of opportunities of people. ²
Greenhouse gases	Gaseous component of the atmosphere, natural or anthropogenic, that absorbs and emits radiation at certain wavelengths of the terrestrial radiation spectrum emitted by the earth's surface, by the atmosphere itself and by clouds.
Stakeholders	Clients, employees, advisors, investors, shareholders, suppliers, organizations, academic and government entities with which Gentera or any of its companies relates and links, seeking to create the greatest possible good.
Fundamental freedoms	These are the rights declared by the Constitution that enjoy the highest level of protection. They are alienable, inviolable and inalienable rights.
Mobbing	Form of group violence, which aims to intimidate, exclude, overshadow, flatten, intimidate, or emotionally or intellectually consume the victim and thereby cause psychological, physical, economic, labor and/or professional damage.
Sustainable Development Goals e (SDG)	Universal call of the United Nations to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030.
One share and one vote system	The traditional one share and one vote system has been designed to give equal treatment to all shareholders.
Sustainability	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
Child labor	Work that deprives children of their childhood, their potential and their dignity and is detrimental to their physical and psychological development.

² National Human Rights Commission (CNDH)

Policies

Generals



6.1 This document must be reviewed and approved every two years by the CEO of Gentera as of its publication.

6.2 The Sustainability area, within the scope of its powers, coordinates the preparation and updating of the sustainability strategy, verifying its compliance by monitoring its actions and indicators, and linking Gentera and its companies to the different international initiatives. that promote sustainable management.

6.3 Gentera in terms of sustainability and ESG management must maintain adherence to the following SDGs as appropriate:

Human rights

- SDG 1 End of poverty
- SDG 3 Health and wellbeing
- SDG 5 Gender equality
- SDG 8 Decent work and economic growth
- SDG 10 Reduce Inequalities

Environment

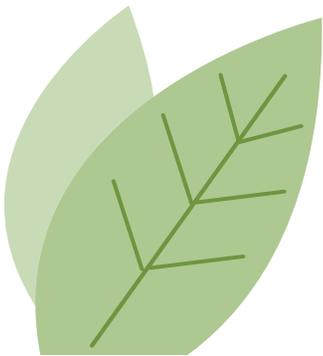
- SDG 6 Clean water and sanitation
- SDG 7 Affordable and clean energy
- SDG 12 Responsible consumption and production
- SDG 13 Climate Action

Health and security

- SDG 3 Health and well-being
- SDG 8 Decent work and economic growth

Responsible Supply Chain

- SDG 12 Responsible consumption and production
- SDG 16 Peace, justice, and strong institutions



Of compliance



6.4 This document must take into consideration the recommendations of national and international organizations, such as:

- Declaration of the International Labor Organization on Fundamental Principles and Rights at Work
- Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities
- United Nations Universal Declaration of Human Rights
- International Bill of Human Rights³
- Convention for the Protection of Human Rights and Fundamental Freedoms, European Convention on Human Rights (ECHR)
- Convention on the Minimum Age of the International Labor Organization
- United Nations Global Compact
- United Nations Sustainable Development Goals (SDGs)
- United Nations Guiding Principles on Business and Human Rights
- Equator Principles
- ISO14001
- Principles for Responsible Banking (PRI) of the United Nations Environment Program Finance Initiative
- Global Reporting Initiative (GRI) standards.

³The Universal Declaration of Human Rights, together with the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights and its two optional protocols.

- Banking Sustainability Protocol of the Association of Banks of Mexico
- Green Protocol of the Association of Banks of Peru



Responsibilities

6.5 The Sustainability Operating Committee shall ensure that the group's business strategy, operations and decisions are aligned with ESG criteria, shall meet semiannually and shall have the following members: Presidents of Gentera, CEO of Gentera, CEO of Compartamos Banco, Corporate CEO of Gentera, Executive Director of Finance, Executive Director of Institutional Relations and Sustainability, Director of Investor Relations, Sustainability Team, in coordination with the Corporate Governance team.

6.6 The CEO of Gentera must review and approve the Group's sustainability strategy, after reviewing the proposal to update the document presented by the , Executive Director of Institutional Relations and Sustainability.

6.7 The Sustainability area, through the management of the Leader, must:

- Determine the goals and initiatives and monitor the progress, with respect to the business strategy, related to environmental, social and governance (ESG) areas through the sustainability strategy and the monitoring dashboard.
- Communicate progress, achievements, and present proposals for continuous improvement to the Executive Officer of Finance and , Executive Director of Institutional Relations and Sustainability on a quarterly basis.

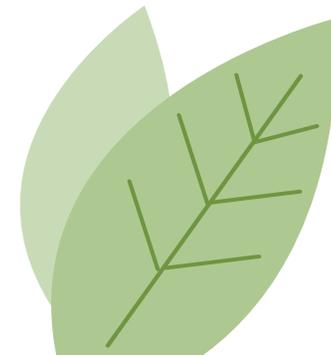
6.8 The Management Team must:

- Promote sustainability, assess the application of best practices, recommended from the Sustainability area, in the Directorate in charge, establish their medium and long-term commitments within the sustainability strategy and report their progress in fulfilling the strategy. of sustainability through the delivery of quarterly information, for partial reports, and annual information for Gentera's Annual and Sustainability Report.
- Promote the protection of the environment in the Directorate in charge, reinforcing the communication actions developed as part of the environmental culture, complying with what is described in the Environmental Commitments section of this document.
- Promote, protect, and ensure compliance with human rights in the Directorate under his charge, promoting compliance with the Code of Ethics and Conduct among his employees.

- Managers must attend to and implement the guidelines of the sustainability strategy and management of ESG issues, prior communication from the Sustainability area to the different Directorates, the protection of the environment and for the protection of human rights, as well as to support managers in this task.

6.9 The administrative and sales force employees must comply with and implement the guidelines for sustainability and management of ESG issues, the protection of the environment and for the protection of human rights in all areas.

6.10 The Sub-Department of Institutional Communication and Sustainability oversees the annual disclosure of performance in environmental, social, and corporate governance (ESG) criteria through the publication of Gentera's Annual and Sustainability Report, available to all stakeholders (see annex 7.3 Interest Groups of Gentera and its companies) on the Gentera / Sustainability website.



Of Environmental Commitments



6.11 The Sustainability area must evaluate and manage the international standards and initiatives in which Genera is a part or with which it is voluntarily committed, as well as for which it is not an obligated subject; the foregoing must be communicated on the Genera / Sustainability / Environment website.

Environmental culture

Genera is committed to actively contributing to caring for the environment and to the prevention, minimization, and mitigation of our impacts. To contribute positively, other interest groups will be involved in promoting care for the environment.

6.12 The Customer Experience Department must periodically position awareness messages on the main Compartamos Banco social networks for customers, to promote the importance of caring for the environment, the responsible consumption of resources and their correct disposal; while the Sustainability area must manage the annual awareness campaign for employees, via internal media.

6.13 As part of the transparent management that characterizes Genera, the company undertakes to communicate, in

accordance with the characteristics mentioned in section 6.9, through the Annual and Sustainability Report the actions to promote the environmental culture carried out in the year of report, as well as the progress of the environmental commitments established in the sustainability strategy.

Environmental legislation

6.14 The Regulatory Compliance Department must comply with the legal environmental requirements and regulations applicable to Genera, these will be communicated on the Genera / Sustainability / Environment website.

Energy

Genera seeks to contribute proactively to the energy transition, responding effectively to the associated opportunities and challenges, applying operational efficiencies within the reach of the organization.

6.15 The Sustainability area will annually coordinate the exercise to quantify and report electricity, fuel, and refrigerant consumption, with the aim of reducing energy consumption.

These consumptions are reported annually through the Greenhouse Gas Inventory of Gentera and its companies, available for public consultation on the Gentera / Sustainability website.

Water

Gentera is aware of the problems related to water scarcity and the responsible management of water resources, for which it is committed to responsible consumption and use of the amount of water it uses.

6.16 The Sustainability area must reinforce the focus on caring for water through the awareness campaign described in the Annual Awareness Campaign for Caring for the Environment for employees.

Waste

Aligned with the objectives of the sustainability strategy, Gentera is committed to developing a program for the efficient use of resources.

6.17 All generation of waste in the corporate building is under the management of the Facilities Management, which is responsible for the identification, disposal method and quantification of waste; data that must be reported quarterly to the Sustainability area via email. This information is part of the data reported in Gentera's Annual and Sustainability Report.

6.18 To minimize the environmental impact, we commit ourselves, in accordance with our scope, to use environmentally friendly materials, manage our waste and permeate this culture with our suppliers, as established in the Code of Ethics and Conduct for suppliers and organizations.

6.19 All measurement of the generation of waste from the operation and its efficient disposal, destruction, reuse, or disposal is established as appropriate:

- Customer information in accordance with the provisions of procedure CB-PDOP-02 Manage destruction of files, with the supervision of the Commercial Projects Management.
- The treatment of electronic waste through the PSD 41 procedure Manage physical destruction of technological assets, in charge of Technological Support.
- The Facilities Management oversees managing and reporting quarterly to the Sustainability area the corporate's recyclable, non-recyclable, and special handling waste, with the participation of specialized suppliers on the subject.

Climate change and emissions

Gentera seeks to cope to the impacts related to climate change, committing to identify, prevent, minimize and mitigate its impacts, as a way to protect its establishments and operations against risks related to climate events.

6.20 We commit to voluntarily measure greenhouse gas emissions related to the commercial activities of Genera and its companies, in accordance with the guidelines established in section 6.14, we recognize that this action allows us to identify opportunities for improvement in environmental performance. The results of the measurement are documented in the Annual Inventory of Greenhouse Gases, which is available for public consultation on the Genera / Sustainability website.

6.21 We commit to replace in a progressive way the use of appliances that use refrigerant gases for others with less environmental impact, through the management of the Real Estate Management Sub-Department.

Of the social commitments



Whole relationships

6.22 All employees of Genera and its companies must recognize the integrity of all people and respect their human dignity in all relationships generated in the performance of their duties with stakeholders (see annex 7.3), complying with the provisions of the Code of Ethics and Conduct.

Anti-corruption

6.23 All employees of Genera and its subsidiary companies must comply with the nine complementary guidelines established in the Code of Ethics and Conduct, rejecting corruption in any of its forms, as well as any type of bribery, fraud and/or extortion.

6.24 We guarantee the integrity of Genera through the permanent work of the Ethics Committee, Audit Committee, Internal Audit Direction, Internal Control and Compliance.

6.25 Genera is committed to working to combat corruption in any of its forms, including extortion and bribery, through the execution of annual courses, certifications and re-certifications in accordance with that described in procedure **PPE-24 Define Annual Training Strategy**, as well as in terms of the Code of Ethics and Conduct **PPE-37 Follow up on Certifications and Recertifications in the Code of Ethics and Conduct**, Prevention of money laundering and financing of terrorism, Privacy of information **MSIF-58 Manage Security Awareness Program of Information and Privacy**, as well as in the **Annual Fraud Prevention Recertification**. Among our stakeholders, mainly employees, officers and shareholders, we promote the annual update on the Intranet of personal information regarding conflicts of interest.

6.26 Every collaborator must immediately report any possible suspicious, unusual or worrying internal operation that is detected with clients or employees or any other activity that contravenes the provisions of the regulations for the Prevention of Money Laundering and Financing of Terrorism, complying with the provisions of the **MPLD- 09 Manual of Policies to Prevent and Detect Operations with Resources of Illicit Origin for Compartamos Servicios and MPLD-01 Manual of Policies to Prevent and Detect Operations with Resources of Illicit Origin for Fundación.**

6.27 Any act of non-compliance must guarantee the confidentiality and integrity of the informers, for which Genera has complaint media that operate in accordance with the published process **G-PCE-01 Give Attention to the Means of Complaints** Annex 7.1 Complaint Means extensive to all our groups of interest, being for public consultation on the Genera website. Similarly, Genera complies with the attention to fraud through the provisions of the Code of Ethics and Conduct and in the procedure **PFR-01 Address possible Fraud Complaints.**

Non - discrimination

6.28 In compliance with the established of its Genera Code of Ethics and Conduct:

- We reject all discrimination, which consist of making any distinction, exclusion, restriction, or preference for reasons of ethnic or national origin, gender, gender expression, age,

disabilities, social status, health condition, religion, opinions, sexual preferences, marital status, or any other that violate human dignity or has the purpose or effect to annulling or undermining the rights and freedoms of individuals.

- It offers equal conditions for its stakeholders with the purpose of they can develop their activities free of any sign of discrimination (mockery, harassment, abuse, bullying, threats, coercion, aggression, physical or psycho-emotional violence, as well as workplace harassment and sexual harassment, or any conduct that violates human dignity or the rights and freedoms of any person).

Diversity and inclusion

Genera is a leader in financial inclusion, serving millions of people in Mexico and Peru, we provide adequate and accessible financial services according to their needs, through the companies Compartamos, Yastás, Aterna, ConCrédito and Fundación Compartamos.

6.29 Genera respects the differences of its clients, employees, officers and communities with which it relates, values the diversity that exists in each one of them and recognizes that their contributions contribute to delivering better products and services adapted to the needs of its clients, building better workplaces and maintain healthy relationships with allies. Managing in accordance with the Mexican Standard NMX-R-025-SCFI-2015 on Labor Equality and Non-Discrimination

6.30 The company has a Diversity and Inclusion Operating Committee to promote initiatives that contribute to gender equity, diversity and inclusion.

6.31 The attraction, selection, develop and training procedures are based on the performance parameters of the employees, in accordance with the strategic needs of management, regardless to the age, sex, disability, race, ethnic, origin, religion, economic status or any other.

Child labor

6.32 In Generera is condemned and rejected any form of child labor as defined in international conventions of the OIT⁴, therefore any supplier must sign the Code of Ethics and Conduct for Suppliers, with which recognize the reception, reading and knowledge of values and norms of conduct contained in, committing to behave in line with them.

6.33 Through Fundación Compartamos, Generera contributes to the integral early childhood development, establishing collaborations with civil society organizations, sharing knowledge, learning about best practices, and financing initiatives in this action line in concordance to the **PFG-02 Define the Strategy to Distribute the Social Responsibility Fund Resources.**

6.34 Every collaborator who is part of Generera and its companies must be of legal age to hold a job, as established by the law in each of the countries where we have presence.

Forced labor

6.35 Generera condemn and rejects forced and obligatory forced practices, doesn't promote them and adheres to the established for the Labor International Organization (OIT) in line with the established in the Code of Ethics and Conduct.

Freedom of association

6.36 Within Generera it is respected the freedom of association and syndical freedom, accept that the employees can found, join and associate freely and effectively to any union or representative body without intervening with Generera and companies. They can also access collective bargaining schemes.

6.37 The company is governed by the relevant applicable regulations and legislation in each country where it has operations and in the Declaration of the International Labor Organization regarding Fundamental Principles and Rights at Work, in line with the provisions of the Code of Ethics and Conduct

⁴ International Labour Organization (1973). Minimum Age Convention.

Decent employment

6.38 The selection, performance evaluation and promotion of the employees of Gentera and its companies is carried out based on their career, knowledge and skills, complying with the provisions of procedure **PPE-01 Evaluate, Attract and Select Talent, PPE-04 Determine Evaluation for Performance Bonus and PPE-29 Manage Development Programs.**

6.39 Gentera encourages its employees to maintain a comprehensive development in their lives through the FISSEP Model in charge of the Department of Philosophy and Social Vocation. The well-being model seeks to inspire employees to take care of themselves in the Family, Intellectual, Health (physical and mental), Social, Spiritual and Professional dimensions.

6.40 The company has fair remuneration schemes which are determined by the functions, skills, aptitudes, achievements and training, work in charge of the Compensation and Personnel Administration Department .

6.41 Benefits and rest days are granted in accordance with the laws in the countries where Gentera has a presence, work in charge of the Compensation and Personnel Administration Department.

6.42 Full and dignified work environments are generated for all employees, preventing, mitigating and resolving human rights

violations in accordance with the provisions of applicable legislation, in accordance with the Code of Ethics and Conduct.

6.43 The aim is to preserve a culture of integrity in the work teams, Therefore, we do not tolerate acts against any person that represent any form of discrimination, labor violence such as harassment or mobbing, as well as sexual violence, such as sexual harassment and sexual harassment, in line with the provisions of the Code of Ethics and Conduct. Consistent with the above, the Whistleblower Follow-up area has its own Follow-up Action Protocols (internal document) to address and sanction complaints on the aforementioned issues, among others, under the terms established by the Ethics Committee of Gentera.

Healthy and clean environment

6.44 All people have the right to enjoy a clean, healthy and wholesome environment; Gentera recognizes this and therefore promotes care for the environment within its facilities and with its stakeholders through the management carried out by General Services and Sustainability.

6.45 The aim is to minimize the negative impact that financial operations, processes, products or services may have on the environment, through awareness actions promoted by the Sustainability Area in coordination with the different areas involved.

Connection with the community

6.46 Promote the development of the communities where we work (directly and indirectly) and recognize and respect their human rights. The greatest contribution is found in offering financial services through the companies Compartamos, Yastás, Aterna and ConCrédito and generating local jobs. Faithful to Gentera's social vocation, it is complemented by the actions developed by the Fundación Compartamos and the social responsibility of Gentera and its companies, in accordance with the manual PFG-02 Define the Strategy to Distribute the Social Responsibility Fund Resources.

6.47 Gentera is a member of the Sustainability Committee of the Mexican Stock Exchange and Compartamos Banco is a member of the Sustainability Committee and the Social Responsibility Committee of the Association of Banks of Mexico, this allows us to be aware of relevant issues in the sector and create opportunities responsibly.

6.48 Monitor the possible risks that the operation could generate and establish monitoring and mitigation plans through the management of the Risk Management Department.

Minority rights

6.49 Gentera recognizes that persons belonging to national or ethnic, religious and linguistic minorities have the right to enjoy their own culture, to profess and practice their own religion, and

to use their own language, in private and in public, freely and without interference or discrimination of any kind, recognized in the Code of Ethics and Conduct and the Code of Ethics and Conduct for Suppliers.

6.50 Gentera respects and protects the rights of minorities, in accordance with the national context where it operates and in accordance with the applicable international declarations⁵ aligned with the Code of Ethics and Conduct and the Code of Ethics and Conduct for Suppliers.

Human rights training

6.51 Promotes between stakeholders, mainly employees, the strengthening awareness of respect for human rights through the promotion and application of our Code of Ethics and Conduct, document that is reviewed and updated annually in accordance with the **PPE-38 Update Code of Ethics and Conduct process**, as well as disseminated to employees through annual certification and recertification, this oversees the Organizational Ethics Sub-Department.

Health and Security

6.52 The Department of People and the Department of Philosophy and Social Vocation must manage the alignment with what is established by the Official Mexican Standard NOM-035-STPS-2018, Psychosocial risk factors at work-Identification, analysis and prevention.

⁵ United Nations (1992). Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities.

6.53 The Security Department must ensure the physical security of employees with monitoring and training actions, complying with the provisions of documents **G-MSF-02 Manage Operational Security Services, MASUC-03 Manual of Internal Security Policies in Branches, MAOS-01 Manual of Internal Security Policies in Service Offices and Offices with an Integrated Branch.**

Of the governance commitments

6.54 In Gentera there are various guidelines that ensure corporate integrity, such as the Code of Good Corporate Governance; the Code of Ethics and Conduct and the Compliance and Integrity Corporate Willingness Agreement.

6.55 Gentera S.A.B de C.V. (“Gentera”) it is a public company listed on the stock market and its shares are pulverized among the investing public. The shares of Gentera, in accordance with its bylaws, are common and are represented by nominative titles, single series, without expression of nominal value, and confer on their holders the same rights and obligations.

6.56 No government institution owns more than 5% of Gentera's voting rights. In the same way, none of its founders or family members own more than 5% of the voting rights.⁶

⁶ Information subject to constant modification; therefore, prior to its dissemination, it should be confirmed directly with the Corporate Governance Sub-Department.

6.57 Gentera has an effective Board of Directors, duly constituted, and responsible for functions understood in three fundamental areas of focus: i) strategy and its monitoring, ii) oversight and approval, and iii) legal and regulatory compliance, as well as the protection of shareholders' rights and interests. Its system is a single-tier system composed of related and independent proprietary directors.

6.58 The members of the Board of Directors are appointed or ratified at the annual general meeting of shareholders, they are chosen for their professional and personal profile, regardless of their gender, ensuring that their experience and specialization in various areas of the business world show results that allow visualizing that your contributions and participation are of great value to Gentera. In addition, for an impeccable reputation and a solid ethical congruence, honorable in personal and family matters and with a sense of transcendence, communing with Gentera's values, which gives clarity, regarding the responsibility they have towards the shareholders (fiduciary duties). Within the Annual and Sustainability Report, delivered to the Mexican Stock Exchange and published on the Gentera website, professional profiles of the directors that make up the composition of the Board of Directors are included.

6.59 The Code of Good Corporate Governance establishes the figure of independent board member in accordance with what is regulated by the Securities Market Law: independent board

members are selected for their experience, capacity and professional prestige, also considering that, due to their characteristics, they can perform their functions free of conflicts of interest and without being subject to personal, patrimonial or economic interests. This definition is included in the declaration of independence that each of the independent board members signs at the time of their appointment or ratification, if applicable.

6.60 The independent board members sign the declaration of independence that complies with the regulations and forms part of their file which is updated annually by the Corporate Governance Subdirection, this information is exclusively for internal consultation.

6.61 The currently Board of Directors has 13 members, 7 of them, that is 53.84% are independent (as defined in the following paragraph), exceeding the 25% required by current legislation. In practice of diversity principles, attending to the equal opportunity that all people have to occupy a position within the Board of Directors, 3 of the 13 members are women, making up 23% of the total members.

The appointments of the members of the Board of Directors are for periods of one year and may be re-elected. Currently, the permanence average of board members in governing body is 10.5 years.⁷

6.62 The Board of Directors of Gentera shall be composed of an

odd number of members as determined by the Ordinary Shareholders Meeting, with the support of the Nomination and Evaluation Committee, but in no case shall such number be less than five or more than fifteen and shall be chaired by a director who may or may not be independent.

6.63 In line with the Code of Good Corporate Governance, the Board of Directors meets at least five times a year on an ordinary basis.

6.64 The Code of Good Corporate Governance establishes that the Board of Directors is evaluated annually in the following aspects: evaluation of the members of the Board of Directors to each individual director, self-evaluation of each director, evaluation of each director to the Board of Directors as a collegiate body, evaluation made by the management team, designated for this purpose, to the Board of Directors as a collegiate body, and the evaluation of the directors to the secretariat of the Board of Directors.

6.65 The operation and effectiveness of the Board of Directors, as well as alignment with the interests of the shareholders, are guaranteed through the adoption of principles and best practices suggested by various national and international organizations, such as the Business Coordinating Council, the Mexican Stock Exchange, the Principles of Corporate Governance of the Organization for Economic Cooperation and Development, the Group of Twenty and the International Finance Corporation. These principles, best practices and applicable regulations are contained in the Code of Good Corporate Governance.

⁷Information subject to constant modification; therefore, prior to its dissemination, it should be confirmed directly with the Corporate Governance Sub-Department.

6.66 In Gentera's bylaws, a clause is included to ensure stability for Gentera's shareholders, known as the poison pill clause, which prevents a possible hostile-takeover; also establishes a clear distinction between the roles of the Chairman of the Board and the Chief Executive Officer. The performance of the latter is evaluated annually by the Corporate Practices Committee as a body of the Board of Directors in accordance with the provisions of the Corporate Governance Code.

6.67 Gentera has a succession plan that ensures the development of the teams and the continuity of compliance with the business strategy, applicable to the CEO and Management Team. It is characterized by being a formal mechanism that allows objective decision making, involves the detection of areas of opportunity and promotes the development of competencies and skills in response to the needs of the environment.

Risk governance

6.68 Among other committees, to achieve the strategic and operational objectives of the business, there is a Risk Committee, a body in charge of enterprise risk management (risk appetite and tolerance), risk monitoring and reporting, as well as information security strategy, among other activities.

6.69 The Chairman of the Risk Committee is responsible for monitoring and auditing risk management performance at the operational level, as well as reporting to the Board of Directors.

6.70 The Board and Management Team are involved in the information security strategy, cybersecurity, and review process.

6.71 The Board of Directors of Gentera has a Director with relevant experience in information systems and technologies, involved in the information security strategy process. In addition to the above, a Technology Committee was created to ensure the efficient management of the Technology area, including, among other matters, the transformation of the technological architecture as an enabler of the digital transformation, as well as to determine and follow up on the medium and long-term technological strategies of Gentera and its subsidiaries.

6.72 The Security Director ensures the physical security of employees and assets of G and its companies, as well as the highest level of cybersecurity; establishes and maintains the strategy and internal processes that protect the information and physical security of Gentera and its companies.

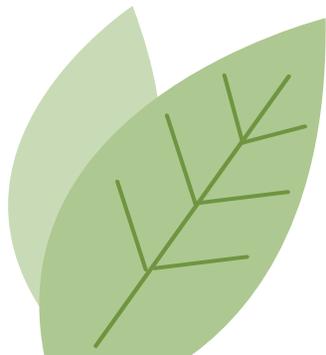


Annexes

7.1 Means of Complaint

We have different means of complaint so that any interested person and their companies can report acts of non-compliance with this policy:

- Code of Ethics and Conduct
- Institutional mail: denuncia@gentera.com.mx
- Transparency mailbox:
www.gentera.com.mx / Quiénes somos / Código de Ética / Buzón de transparencia
- Phone:
 - Mexico: 800 5061 264 / option 3
 - Peru: 08000 0903
- Internal Affairs (fraud)
- Institutional mail: asuntosinternos@compartamos.com
- Intranet / Means of reporting
- Prevention of Money Laundering and Financing of Terrorism
- Institutional mail Compliance Officer:
oficialcumplimiento@compartamos.com
- Intranet / Means of reporting



7.2 Stakeholders of Gentera and its companies.



Clients

Our clients are people committed to their families and communities, for whom the individual income they receive from their productive activities becomes a common good that allows them to share and diversify their opportunities. At Gentera, we provide them with appropriate and accessible financial services that seek to boost their economy.



Employees

Our employees work every day, committed to promoting the dreams of our clients. Their daily work is fundamental to guarantee the sustainability of Gentera and its companies, in all its operations and with all its stakeholders.



Investors

We transparently disclose information that is relevant to the different stakeholders of Gentera and its companies, always in strict compliance with regulations and best market practices.



Community

We assume a proactive role with the needs of the communities where we are present through our financial services, the creation of sources of employment, and our Foundation.



Suppliers

We maintain ethical, collaborative and respectful relationships with our suppliers, who are required to comply with integrity, social and environmental criteria.



Environment

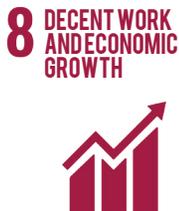
We participate in creating a sustainable future by responsibly managing the resources we need to operate, while identifying risks and opportunities related to climate change that could impact our business.

7.3 Sustainable Development Goals (SDGs)

SDG	Related Goals	Related indicators
<p>1 END OF POVERTY</p> 	<p>1.1 By 2030, eradicate extreme poverty for all people in the world, currently calculated at an income of less than US\$1.25 per day per person.</p> <p>1.2 By 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all of its dimensions according to national definitions.</p>	<p>1.1.1 Proportion of population living below the international poverty threshold, broken down by sex, age, employment status, and geographic location (urban or rural).</p> <p>1.2.1 Proportion of the population living below the national poverty threshold, segmented by sex and age.</p> <p>1.2.2 Proportion of men, women and children of all ages living in poverty, in all of its dimensions, according to national definitions.</p>
<p>3 HEALTH AND WELLNESS</p> 	<p>3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health services, and access to safe, effective, affordable and reliable medicines and vaccines for all.</p>	<p>3.8.2 Proportion of population with major health expenses per household, as well as the percentage of the household expenditures or income.</p>

SDG	Related Goals	Related indicators
<p>5 GENDEREQUALITY</p> 	<p>5.1 End all forms of discrimination against all women and girls worldwide.</p>	<p>5.1.1 Determine whether or not legal mandates exist to promote, enforce, and strengthen gender equality and non-discrimination.</p>
	<p>5.2 Eliminate all forms of violence against all women and girls in both the public and private spheres, including human trafficking and other types of abuse.</p>	<p>5.2.1 Proportion of women and girls aged 15 years and older who have experienced physical, sexual or psychological abuse at the hands of a current or former intimate partner in the last 12 months. Broken down by form of violence and age.</p>
		<p>5.2.2 Proportion of women and girls aged 15 years and older who have experienced sexual violence at the hands of a person who was not their intimate partner in the last 12 months. Disaggregated by age and place of occurrence.</p>
	<p>5.5 Ensure women's full and effective participation and equal opportunities for leadership at all decision-making levels in political, economic, and public life.</p>	<p>5.5.2 Proportion of women in decision-making positions.</p>
<p>5.b Enhance the use of enabling technology, particularly information and communications technology, to promote women's empowerment.</p>	<p>5.b.1 Proportion of people who own a cell phone, broken down by their gender.</p>	

SDG	Related Goals	Related indicators
<p>6 CLEAN WATER AND SANITATION</p> 	<p>6.3 By 2030, improve water quality by reducing pollution, eliminating the discharge of chemicals and hazardous materials, halving the percentage of untreated wastewater, and significantly increasing recycling and reutilization of waste materials.</p>	<p>6.3.1 Proportion of adequately treated wastewater.</p>
	<p>6.4 By 2030, significantly increase the efficient use of water resources in all sectors and ensure the sustainability of freshwater withdrawal and supply to address water scarcity and significantly reduce the number of people suffering from water scarcity.</p>	<p>6.4.1 Efficient change in the use of water resources over time.</p> <p>6.4.2 Water stress level: freshwater withdrawal in proportion to available freshwater resources.</p>
<p>7 AFFORDABLE AND NON-POLLUTING ENERGY</p> 	<p>7.2 De aquí a 2030, aumentar considerablemente la proporción de energía renovable en el conjunto de fuentes energéticas.</p>	<p>7.2.1 Ratio of renewable energy consumption.</p>

SDG	Related Goals	Related indicators
 <p>8 DECENT WORK AND ECONOMIC GROWTH</p>	<p>8.3 Promote development-oriented policies that support productive activities, the creation of decent jobs, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro, small and medium-sized enterprises, even through access to financial services.</p>	<p>8.3.1 Proportion of informal employment in the non-agricultural sector, broken down by gender.</p>
	<p>8.8 Protect labor rights and promote a safe and secure working environment for all workers, including migrant workers, in particular migrant women and those in precarious employment.</p>	<p>8.8.1 Frequency rates of fatal and non-fatal occupational injuries, broken down by both gender and immigration status.</p>
	<p>8.10 Strengthen the capacity of national financial institutions to promote and expand access to banking, financial, and insurance services for all.</p>	<p>8.10.1 a) Number of commercial bank branches per 100,000 adults and b) number of automated teller machines per 100,000 adults.</p> <p>8.10.2 Proportion of adults (aged 15+) who have a bank account, an account with a financial institution or a mobile money service provider.</p>

SDG	Related Goals	Related indicators
<p>10 REDUCCIÓN DE LAS DESIGUALDADES</p> 	<p>10.1 By 2030, progressively achieve and maintain income growth of the poorest population (40%) at a rate higher than the national average.</p>	<p>10.1.1 Per capita growth rates of household expenditures and income of the poorest population (40%) as well as the overall population.</p>
	<p>10.2 By 2030, enhance and promote the social, economic and political inclusion of all people, regardless of age, gender, disability, race, ethnicity, origin, religion, economic or other status.</p>	<p>10.2.1 Proportion of people living below the 50% of average income, broken down by sex, age and persons with disabilities.</p>
	<p>10.3 Ensure equality of opportunity and reduce inequality of outcomes, and to eliminate discriminatory laws, policies, and practices, including by promoting appropriate legislation, policies, and measures in this regard.</p>	<p>10.3.1 10.3.1 Proportion of the population reporting having felt personally discriminated against or harassed in the last 12 months on grounds of discrimination established in international human rights law.</p>
	<p>10.5 5 Improve regulation and oversight of global financial institutions and markets and strengthen enforcement of these regulations.</p>	<p>10.5.1 Financial condition indicators.</p>

SDG	Related Goals	Related indicators
<p data-bbox="138 542 369 618">12 RESPONSIBLE PRODUCTION AND CONSUMPTION</p> 	<p data-bbox="478 350 1163 548">12.4 By 2020, achieve the environmentally right management of chemicals and all wastes throughout their life cycle, in accordance with agreed international guidelines, and significantly reduce their discharge to air, water and land to minimize their adverse effects on human health and the environment.</p>	<p data-bbox="1266 423 1944 483">12.4.2 Hazardous waste generated per capita, proportion of hazardous waste treated, by type of treatment.</p>
	<p data-bbox="478 651 1163 711">12.5 By 2030, significantly reduce waste generation through prevention, reduction, recycling and reuse.</p>	<p data-bbox="1266 670 1944 699">12.5.1 National recycling rate, in tons of recycled material.</p>
	<p data-bbox="478 794 1163 924">12.6 Encourage companies, especially large companies and transnational corporations, to adopt sustainable practices and incorporate sustainability information into their reporting cycle.</p>	<p data-bbox="1266 837 1944 898">12.6.1 Number of companies publishing sustainability reports.</p>
<p data-bbox="138 1122 338 1182">13 REDUCTION OF INEQUALITIES</p> 	<p data-bbox="478 1110 1163 1170">13.2 Incorporar medidas relativas al cambio climático en las políticas, estrategias y planes nacionales.</p>	<p data-bbox="1266 1016 1965 1284">13.2.1 1 Number of countries that have reported the implementation of an integrated policy, strategy or plan that enhances their capacity to adapt to the adverse effects of climate change and that promotes low greenhouse gas emission development without compromising food production (e.g., national adaptation plan, nationally determined contribution, national communication or biennial update report).</p>
	<p data-bbox="478 1382 1163 1511">13.3 Mejorar la educación, la sensibilización y la capacidad humana e institucional respecto de la mitigación del cambio climático, la adaptación a él, la reducción de sus efectos y la alerta temprana.</p>	<p data-bbox="1266 1382 1965 1511">13.3.2 Number of countries reporting increased institutional capacity building to systematically and individually implement adaptation, mitigation and technology transfer activities and development measures.</p>

SDG	Related Goals	Related indicators
	<p>16.5 Significantly reduce corruption and bribery in all its forms.</p>	<p>16.5.1 Proportion of individuals who have at least once paid a bribe to a public official, or been asked for a bribe by a public official, during the last 12 months.</p> <hr/> <p>16.5.2 Proportion of businesses that have paid a bribe to a public official, or been asked for a bribe by a public official, during the last 12 months.</p>
	<p>16.b Promote and implement non-discriminatory laws and policies in favor of sustainable development.</p>	<p>16.b.1 Proportion of the population reporting having felt personally discriminated against or harassed in the last 12 months on grounds of discrimination under international human rights law.</p>

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