

*Code of Ethics and Conduct
for Suppliers and
Organizations
Gentera*



GENTERA®

Table of Contents

Message from our CEO 3

Subjects and purpose of the Code 4

Introduction 5

CHAPTER 1: Our Philosophy 6

CHAPTER 2: Conduct with Genera 9

 Integrity in our relationships 10

 Use of assets and services 10

 Conflicts of Interest 11

 Fraud 12

 Information Handling 13

CHAPTER 3: Conduct with our clients 14

 Our client protection promise 15

CHAPTER 4: Conduct with society 16

 Human and Labor Rights 17

 Relationship with the environment 18

 Corruption 18

 Anti – Money Laundering and Financing of Terrorism (AML and FT) 19

CHAPTER 5: Speak Up Line 20

Commitment Letter 23

Appendix. Comprehensive Privacy Notice for Grupo Genera’s Suppliers 24

Message from our CEO

Dear Suppliers and Organizations,:

Gentera is a group comprised of several companies and a Foundation. Our Purpose is to boost dreams by solving our client's financial needs with a human touch.

We believe that, regardless of its size or type, a company has not only an economic purpose, but also the aim to serve within society to become a resource through which the success of everyone who works and depends on it becomes possible.

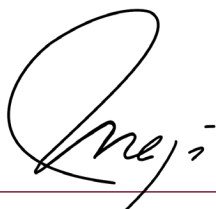
In this light, every company has the potential to become an agent of social change, respecting everybody's dignity and promoting the common good. To achieve this purpose, it is essential to create environments where every single person has an ethical behavior and a positive impact on their work, family, and community, thus generating social, economic, and human value, a Total Value Framework.

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

Today you take part in a great value chain that allows us to achieve our Purpose day by day, by serving our clients and collaborators with passion and responsibility.

We invite you to share our Purpose, live our Philosophy, and comply with the behaviors with which we strengthen the ethical culture that the industry and society need to become better every day.

Sincerely

A handwritten signature in black ink, appearing to read 'Enrique', is positioned above a horizontal line.

Enrique Majós Ramírez
CEO of Gentera

Subjects and purpose of the Code

Ethics is the science that helps us distinguish the goodness and badness of free acts; a set of free acts performed by a person is what we define as “conduct”¹. At Genera, we recognize the importance of ethics in guiding our conduct, so based on this understanding, and inspired by our Philosophy, we spread the idea among our collaborators that acting ethically means *doing the greatest possible good*.

This Code of Ethics and Conduct for Suppliers and Organizations (hereinafter “the Code”) is directed to all our goods and services suppliers (hereinafter “Suppliers”), as well as to civil society organizations², and centralized or decentralized government agencies (hereinafter “the Organizations”), with which Genera or its companies³ establish a commercial or collaborative relationship. Its compliance is mandatory, and it is the responsibility of our Suppliers and Organizations (including their directors, officers, and collaborators) to observe and enforce all the conducts described therein⁴.

This Code is the tool that communicates the criteria and behaviors for us to build a culture based on values, and the resources we use to protect it. By means of this Code, we promote high ethical standards in order to preserve Genera’s integrity and reliability, ensure compliance with the law, protect our clients⁵ interests, and establish a fair and equitable work environment for all those who work with or for our companies. This Code is aligned with the Universal Declaration of Human Rights, the standards of the International Labour Organization (“ILO”), and the applicable labor laws of the countries where we operate⁶.

In coherence with the above, this Code addresses a series of conducts in an enunciative, but not limiting way, that is, it does not include all situations that could represent a conflict of an ethical nature. In the event of non-compliance with this Code or 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 under the terms established in the agreement entered between the parties.

Genera has several monitoring schemes and systems to detect any violations to this Code and submit them to Genera’s Ethics Committee if needed. Should there be any doubts about the interpretation of this Code, the Organizational Ethics area will attend and solve them through the institutional Speak Up Line.

¹ Cf. Rodríguez Nuño, A., (*Ética general*), Ediciones Universidad de Navarra, Navarra, 2010, pp. 20-22.

² Civil society organizations are groups formed by individuals, based on associative ties, which may conduct activities aimed for the defense and respect of human rights, as well as activities to support or assist third parties without profit or partisan, political-electoral or religious proselytism; said activities do not seek personal benefits but community social benefits.

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., FinCrematar S.A. de C.V., Banco Compartamos, S.A. (Peru), Aterna Corredores de Seguros S.A., Pagos Digitales Peruanos S.A., and Comfu Perú S.A.C., as well as any entity that is to be merged, formed, or acquired in the future, and which, as a whole, and for the purposes of this document, are referred to as Genera.

⁴ It is important to note that this Code is a normative complement; therefore, in case of contravention of the principles invoked in it, sanctions established by the competent laws and courts may be applied.

⁵ We refer to clients as all individuals who receive a product or service from Genera. This term encompasses borrowers, cardholders, commission agents, entrepreneurs, and/or users, depending on the business model of each of our companies.

⁶ In Mexico we are aligned with the following national laws: *Ley Federal del Trabajo*, *Ley General de Acceso de las Mujeres a una Vida Libre de Violencia y el Modelo de protocolo para prevenir, atender y erradicar la violencia laboral en los centros de trabajo*; as well as *Ley General del Trabajo* and *Ley de Prevención y Sanción del Hostigamiento Sexual* in Peru.

Introduction

This Code is divided into five chapters. Each of them reflects the main areas where we aim to carry out and strengthen an ethical culture, setting the standards of the conducts expected from the Suppliers and Organizations that collaborate with us in some way:

- 1.** Our Philosophy
- 2.** Conduct with Gentera
- 3.** Conduct with our clients
- 4.** Conduct with society
- 5.** Speak Up Line

We will begin with a summary of our person-centered Philosophy, which is the source of inspiration for our ethical culture. Afterwards, we will establish the conducts we expect from the Suppliers and Organizations in the different areas where their actions have an influence, firstly on Gentera, then on our clients, and finally on the society. The fifth chapter is dedicated to explaining the means by which the Suppliers and Organizations can report any breaches of our standards of conduct and collaborate with us to preserve the integrity of all our actions.

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CHAPTER I

Our Philosophy

CHAPTER I:

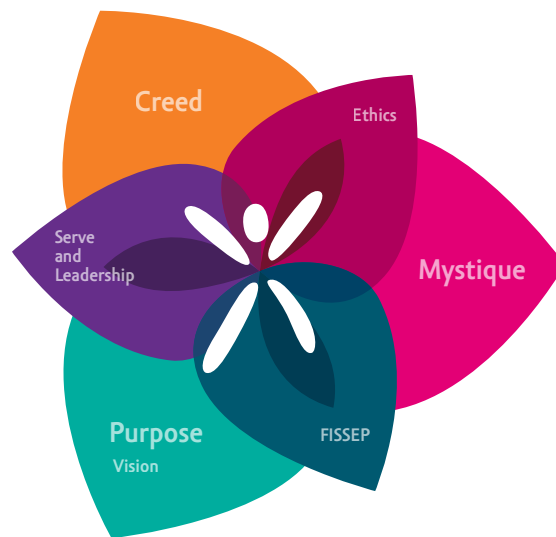
Our Philosophy

It is our way of thinking and acting, it gives us a sense of transcendence, and invites us to be happy and fulfilled. It commits us to carry out a constant effort to become the best version of ourselves, thus creating value for our clients through a business model focused on the person and their needs.

Therefore, we deem important that everyone who is part of our value chain (our collaborators, Suppliers, and Organizations) is aware of and committed to these principles that 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:

These are its three fundamental elements:



Our **Purpose** is “To boost dreams”, and we fulfill it by attaining our **Vision** “To solve the financial needs of our clients with a human touch”.

Our **Creed** is the expression of the deep convictions that guide our daily actions, regardless of the time or place where we are:

1. We believe in the person and their ability to improve in order to become someone better.
2. We believe that to act ethically is to do the greatest possible good, and we strive to make it a reality in our lives.
3. We believe that exclusion is a cause of poverty, and that we generate inclusion and development by offering access to competitive and quality financial solutions.
4. We believe in using business principles to help solve social problems.
5. We believe that, in the right context, profitability is the driver of development and of the creation of competitive and efficient industries.

6. We believe that there is a place where social, economic, and human values coexist and reinforce each other.
7. We believe in sustainable development and care for the environment.
8. We believe in “Service through Leadership (Serviazgo)” as a leadership style based on the service to others, which inspires and transcends through serving, training, growing, and delivering results.
9. We believe that we should pursue inspiring and transforming, even though the challenge is enormous.

Finally, we promote our **Mystique**, which is “the living of our institutional values”, in order to become better every day:

- **Person:** is the center of our values.
- **Service:** we give ourselves to others because we are interested in their good.
- **Teamwork:** we collaborate with others to achieve more.
- **Responsibility:** we keep our word with integrity and assume the consequences of our actions.
- **Passion:** we love everything we do.
- **Profitability:** we do more with less to serve better.

This Philosophy inspires our ethical behavior and guides the way in which we seek to do the greatest possible good in all circumstances, being the basis for the conduct promoted by this Code of Ethics and Conduct.

Down below, we present the behaviors that Genera expects from the Suppliers and Organizations in the pursuit of the common good. We invite you to make them come to life and, when necessary, make use of our Speak Up Line to ask any questions or resolve any doubts about this Code, or to report any breach of the Code by any of our collaborators.



CHAPTER 2

Conduct with Gentera

CHAPTER 2:

Conduct with Gentera

Integrity in our relationships

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

1. Communicating with our collaborators, clients, and/or clients' family members a either formally or informally, in a respectful, informative, and honest manner, in accordance with our Philosophy ensuring that such interactions are not perceived as sexual harassment or overly familiar behaviors that are inappropriate for the setting or the professional relationships we seek to establish.
2. Providing Gentera with an equitable, transparent, honest, and fair treatment, always seeking the benefit of both parties.
3. Under no circumstance should they resort to intimidating means against anyone to force due compliance with a contract, agreement, payment, methodology or service in favor of Gentera or a third party.
4. Identifying and letting Gentera know of any risk derived from their internal operations that may have any financial impact, or mean a risk or damage to the reputation, legal compliance or operation of Gentera.
5. Notifying of any situation that may represent a conflict of interests to the operation of Gentera or its companies.

Use of assets and services

To avoid any improper use of our assets and services, including but not limited to the Suppliers and Organizations, these shall refrain from:

1. Using the tools provided by Gentera as a whole or in part, with carelessness, mistreatment, producing a waste that causes unnecessary expenses, or in a way that violates the moral standards and good customs; as well as using them for pornographic purposes, for activities that jeopardize the good name and brands of Gentera, to conduct illegal activities, or in a way that damages the environment. Such tools may include, but are not limited to, computer equipment, telephones, cell phones, tablets, e-mail services, institutional e-mail accounts, internet, and printing services. At any time and in any form, persons authorized by Gentera may access such tools, and Gentera may use any type of information or content located therein. The above will be always in compliance with the applicable laws on information security and personal data protection.
2. Sharing or renting work tools provided by Gentera with third parties.
3. Lending technological equipment or software of any kind to Gentera's collaborators for testing, prior to entering into a contract or collaboration agreement, unless Gentera's operation requires it and if it complies with the corresponding Purchasing policy. If the loan occurs after entering into a contract or collaboration agreement, these must indicate the terms of use, period, and purpose.

Conflicts of Interest

A conflict of interest exists when our own interests, those of those of our families⁷ make it difficult for us to decide or act efficiently and objectively, as it may be assumed that our own interest prevails over the interest of Gentera.

Even if there is no real or potential conflict of interest, if others perceive that there is, they will doubt the ability of the Suppliers or Organizations to act objectively. For this reason, it is as important to avoid an apparent conflict of interest as it is to avoid being in an actual conflict, as such a perception can damage the reputation of the person, the Supplier or Organization, or Gentera.

To avoid any conflict of interest, Gentera's Suppliers and Organizations (including its directors, officers, and collaborators) must always avoid taking actions that may oppose, or seem to oppose, with the legitimate interests of Gentera. Particular care should be taken in order to evaluate the possibility of a conflict of interest arising in business or personal relationships with directors, officers, collaborators, or competitors of Gentera.

Any situation that constitutes or could give rise to a conflict of interest should be avoided and reported immediately via e-mail to conflictodeintereses@gentera.com.mx, and follow Gentera's internal policies to avoid it.

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

1. Offering, providing or sending any type of gratuity, gift, discount, hospitality, donations, trips or favors to directors, officers, and collaborators of Gentera, as well as to their relatives, by any electronic or physical means, to their private address or to any facility of Gentera or its companies. Any similar action will be considered as an attempt to influence on said group of people's decisions.
2. Receiving or accepting any gifts, gratuities, donations or favors from our directors, officers, or collaborators, to give preference to their personal interests.
3. Giving or receiving personal loans from directors, officers, and collaborators of Gentera, either in cash or in kind.
4. Performing activities that cause conflict or prevent the fulfillment of the objectives they have with Gentera as Suppliers and Organizations.

In addition to the aforementioned points, the Suppliers and Organizations performing their services or projects for Gentera with external personnel must consider the following:

⁷ Family is understood as people related to each other up to the fourth level of kinship in the following cases: by blood (father, mother, grandparent, child, sibling, half-sibling, grandchild, uncle, cousin, nephew, niece); affinity (between the collaborator and his or her spouse, cohabitant, in consensual union, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, father-in-law or mother in-law of one's son or daughter, brother-in-law or sister in-law of one's partner brother or sister, stepfather and stepmother). Gentera considers, within the term "family" or "relatives", the friends or people related to each other by a sentimental or friendship bond, but are not related through blood or affinity. For example, a boyfriend, girlfriend, godfather, godmother, godchild, son's godfather, daughter's godfather, son's godmother, daughter's godmother, among others.

1. They may not be hired when their shareholders or partners, members of the Board of Directors, statutory auditors, legal representatives, managers or collaborators have a family relationship (by blood or by affinity up to the second degree, that is as parents, grandparents, brothers, sisters, sons, daughters, grandsons, granddaughters, spouses, father/mother in law, the parents of the father/mother in law, brother/sister in law) with any collaborator of the Management area of Genera requesting the service or project, nor when they subcontract the service or project entirely to another company. In the event subcontracting is necessary, such Supplier or Organization must ensure that the subcontractor complies with this Code, the policies and procedures established by Genera, as well as the applicable laws and regulations in all cases.
2. Suppliers will not be hired, nor will alliances be made with Organizations whose shareholders or partners, members of the Board of Directors, statutory auditors, legal representatives, managers and/or leaders of the services or projects are former collaborators of Genera, unless at least one year has passed since they terminated their employment relationship with any of our companies, and whose employment relationship with Genera was not derived from the perpetration of conducts against our Code of Ethics and Conduct or the existing laws, that attempted against Genera's estate, brands and reputation, or that caused an affectation to its clients.

Fraud

At Genera, fraud is considered to occur when a person, intentionally and by means of deception, abuses the trust that Genera has placed in them and/or their work powers, to obtain some benefit for themselves or a third party, causing or potentially causing a financial loss or damage to the company and/or anyone with whom it has a relationship (clients, collaborators, partners, subsidiaries, among others).

Genera's Suppliers and Organizations are prohibited from, but not limited to:

1. Contributing to operations with resources of probable illicit origin being conducted through Genera.
2. Distorting, altering, falsifying, or manipulating information supporting an offer or proposal, as well as records, operations, accounting information, invoices, budgets or any document, voucher, or request.
3. Falsifying or altering the information of Genera's collaborators or clients, such as their autographic signature, fingerprint, personal, financial, and sensitive data.
4. Making an improper use of the information of Genera, its companies, clients and/or collaborators for their own benefit or for the benefit of a third party.
5. Misrepresenting themselves as legitimate companies using false certifications in order to carry out illegal activities.
6. Concealing or downplaying issues and/or vulnerabilities related to their products or services.
7. Marketing products or services that fail to meet expected standards using manipulative tactics.

Information Handling

The Suppliers and Organizations are obliged to treat as confidential and/or secret all information they learn, directly or indirectly, as a result of services, projects, functions or participation with Genera, committing themselves not to use, disclose, publish, disseminate, transmit, share, obtain, copy or extract it, unless it is strictly necessary for the development of their services or projects, and always in compliance with current laws, internal policies and express authorization from Genera; likewise, they may not share it with third parties who are not legally authorized to know it⁸.

By way of example but not limited to, it is considered to be confidential and/or secret information, regardless of the medium in which it is found, whether in electronic, printed or any other form:

1. Any financial, banking, accounting, legal or business operations information from the Owners of the personal data related to Genera and its companies.
2. Any information, data, formulas, methods, specifications and characteristics of the products and services, plans, policies, brands, databases and commercial or business strategies belonging to Genera.
3. Any techniques, policies, plans, strategies, mechanisms, projects, projections, estimations, methods, processes, systems, and technologies that have been registered or patented in the name of, and/or used by Genera.
4. The results of any analysis, test, projection and new projects of any kind or nature.
5. Any software, internet, or computer programs, as well as any product, device, mechanism, tool, or software systems either belonging to Genera, or being operated by Genera through a license of use.
6. Compensation policies, salaries and paying structures of Genera.
7. Any information or content of the contracts, negotiations or agreements made by Genera.
8. Any accounting, financial, tax, legal, strategic, or business information of Genera.
9. Any information that may be considered a business secret of Genera.
10. Any information entailing a commercial, competition, economic or business advantage to Genera in relation to third parties.
11. Any kind of database, policy, code, guideline, agreement, protocol, regulation, provision, contract, or internal standard created by Genera.

The Suppliers and Organizations are prohibited from engaging in the following conducts, among others:

1. Providing any news or information about Genera's clients, directors, officers or collaborators, or other Genera's Suppliers or Organizations.
2. Providing explicit information about the operations or activities conducted in Genera, since this information cannot be disclosed to third parties without Genera's consent.
3. Disclosing any false, biased, or confidential information that may affect Genera.
4. Using Genera's trademarks or logos for any external communication or advertising.

In all circumstances, the Suppliers and Organizations have a higher obligation to take care of the name, brand, and image of Genera, as well as of the institutions and companies with which they have commercial, collaboration, donation, or alliance relationships.

⁸ The disclosure of information is limited exclusively to competent authorities, pursuant to a court order issued by a judge with proper jurisdiction in the matter, in accordance with applicable legal provisions, subject to prior authorization from the Legal Department, or to comply with legal regulations established by the regulatory authority.



CHAPTER 3

Conduct with our clients

CHAPTER 3:

Conduct with our clients

Our client protection promise

For all of us who work at Gentera, the most important element is the person, and our clients are our reason for being, so they become the center of everything we do, and protecting them is key in our daily work as we provide inclusive financial services in a secure, responsible, and fair manner.

In order to offer responsible finance, it is fundamental for Gentera to comply with seven principles. We invite you to get to know them:

- 1. Appropriate products and services:** we design and offer products and channels that meet the diverse needs and characteristics of our clients.
- 2. Prevention of over-indebtedness:** we analyze our client's information to determine their ability to pay; through adherence to established policies and procedures we strive to prevent over-indebtedness of our clients.
- 3. Transparency:** we communicate prices, terms, and conditions clearly and accurately to our clients in a timely and sufficient manner, using a language that the clients understand, so that they can make their decisions based on accurate information.
- 4. Fair and respectful treatment of clients:** we always respect the dignity of our clients and their families, behaving ethically and offering them a close, warm, and excellent service.
- 5. Reasonable prices:** we take care that the prices and terms are responsible and accessible to our clients, allowing the company to be sustainable.
- 6. Privacy of client data:** we protect client data in accordance with the standards and requirements of the laws established in the banking secrecy and the applying laws in Mexico⁹ and Peru.
- 7. Mechanisms for the resolution of complaints:** we inform our clients of the appropriate means to communicate their complaints or comments, which will be managed and resolved in a timely manner through a responsible institutional system and having efficient monitoring and control mechanisms.
- 8. Gentera's Corporate Governance's vow to protect our Clients:** we make every strategic decision is based on the social and financial data of our Clients and their environment. The Corporate Governance and Senior Management of Gentera coordinate efforts to ensure a relationship based on integrity and sustainability between our Clients, workers and the business results.

In line with our protection promise, Suppliers and Organizations shall act accordingly as far as their services and projects are concerned, and respect at all times the rights and obligations of Gentera's clients, partners, or commission agents.

⁹ In Mexico: Ley Federal de Protección de Datos Personales en Posesión de Particulares.

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CHAPTER 4

Conduct with society

CHAPTER 4.

Conduct with society

Human and Labor Rights

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

1. Free choice of employment. We reject the use of involuntary, prison, debt or forced labor, slavery, or any form of servitude.
2. Fair treatment. The Suppliers and Organizations must provide their collaborators with an environment free of violence or inhumane treatment, or any form of psychosocial abuse.
3. Child labor and young workers. In coherence 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 any form of forced or compulsory labor.
4. Diversity and Inclusion. The Suppliers and Organizations shall provide a workplace free from any form of discrimination and exclusion based on race, nationality, sex, age, physical attributes, social origin, disability, union membership, religious orientation, marital status, pregnancy, sexual orientation, gender identity, gender expression or any other according to Section 3, Article 1¹⁰, of Peru's Federal Law to Prevent and Eliminate Discrimination¹¹ (*Ley Federal para Prevenir y Eliminar la Discriminación*), and the Law to Prevent Acts of Discrimination Number 27270 (*Ley Contra Actos de Discriminación No. 27270*).

We value diversity¹² at Genera and recognize the contributions that everyone is able to make to achieve our objectives and maintain healthy relationships with the Suppliers and Organizations.

5. Salaries, benefits and working hours. Suppliers and Organizations must ensure the compliance with the local existing laws for their collaborators' working hours not to exceed the maximum allowed, earn a wage that enables them to live properly, and have optimum health and safety conditions at their working place during they everyday labors.
6. Freedom of Association. In accordance with applicable local laws, the Suppliers and Organizations shall respect the rights of their collaborators to associate freely, join unions, seek representation, be members of committees and participate in collective bargaining without fear of retaliation.

¹⁰ In Mexico: Ley Federal de Protección de Datos Personales en Posesión de Particulares.

¹¹ In compliance with said law, and for the purposes of this Code, the term "discrimination" will be understood as any act of distinction, exclusion, restriction or preference propelled by reasons of ethnical or national origin, skin color, sex, gender, gender expression, age, disabilities, social or economic conditions, mental or physical health conditions, religion, identity or politics affiliation, physical appearance, sexual orientation, marital status, pregnancy, language, or any other that threatens human dignity or is aimed to, or having the effect to cancel or undermine individuals

¹² In compliance with the equality and non-discrimination policies conducted by Genera, as stipulated in the MPE-05 Labor Equality and Non-discrimination Policy (*MPE-05 Política de Igualdad Laboral y No Discriminación*).

Relationship with the environment

Additionally, the Suppliers and Organizations, according to the scope of their activities, shall:

- 1.** Comply with local laws, regulations, and standards on environmental matters to facilitate environmental protection.
- 2.** Have a process in place to ensure compliance with local regulations regarding waste management, recycling and disposal, and handling of hazardous materials.
- 3.** Monitor their harmful emissions and waste, to identify opportunities for their reduction.
- 4.** Seek to contribute to the recycling and reusing of products and materials used.
- 5.** Take responsibility for any act or omission that damages the environment and correct it diligently.
- 6.** Promote the use of environmentally friendly technologies.

Corruption

Corruption may occur through diverse types of conduct and situations; however, in general, it consists of directly or indirectly promising, granting, accepting or requesting an illicit benefit of any kind (be it of financial nature or not related to it), thus violating the applicable law, as an inducement or reward for someone to perform or stop performing an action related to the fulfilment of their duties.

Corruption is a serious offense in any field and under any circumstance. This is why we totally reject it at Genera, and the reason we have zero tolerance for any act of corruption. We are firmly committed to carrying out our business in an honest and ethical manner to remain trust-worthy by those around us. We acknowledge that not only is transparency enough when it comes to our relationship with others, but also the constant fight against corruption in all its forms.

Therefore, in a general but not limiting way, Genera's Suppliers and Organizations must totally refrain, every time and in every way, from the following acts of corruption:

- 1. Bribery.** The direct or indirect offering, promising, authorization or acceptance of any improper economic handout, or any other inappropriate benefit, to obtain or maintain an improper business for Genera or anyone else.
- 2. Extortion.** The demanding of a bribery or payment, whether or not it comes along with a threat for opposing to give out whatever it was demanded. Any attempt of direct or indirect extortion is rejected by Genera, and the Suppliers and Organizations are urged to denounce such attempts to the Speak Up Line.
- 3. Influence peddling.** The offering or requirement of an illicit advantage in order to execute an improper influence, whether real or supposed, over a public officer, aiming to obtain an illicit benefit or advantage for Genera or any other person.

Corruption practices not only constitute a violation to this Code, but they may also imply a severe violation to civil, administrative, and criminal anti-corruption laws at the countries where Genera operates.

The Ethics Committee is responsible for establishing any disciplinary sanction depending on the severity or the fault. Externally, the sanction will be determined by the corresponding authority according to the applicable laws.

Anti – Money Laundering and Financing of Terrorism (AML and FT)

Money Laundering and Terrorist Financing are serious crimes. The first one is the process through which an attempt is made to conceal, disguise, or cover up the origin of the generated resources by carrying out an illicit activity, with the purpose of making those resources appear legitimate. The second consists of the contribution, financing or collection of economic resources or funds with the purpose of provoking alarm, fear, or terror in the population through the use of threats or violence by persons or groups, against persons or sectors of a society, with the purpose of forcing governments or political entities to respond to demands of a political, social, or religious nature.

To combat them, Genera has an specialized department focused on these issues, called “Anti - Money Laundering”, and is run by the Compliance Officer. This area is in charge of reviewing every natural person or legal identity who intends to enter into a contractual relationship with Genera or any of its companies, or ask them for documentary support whenever required, as well as ensuring that the Organizations with which it has a relationship fully comply with the applicable laws on Anti- Money Laundering and Terrorist Financing. Through its whistleblower channels, said department responds to the reports made by the collaborators of Genera regarding any suspected Unusual, Worrying and Suspicious Internal Transactions that they identify.

Suppliers and Organizations that have a relationship with Genera must ensure awareness, proper implementation, and full compliance with laws related to the Prevention of Money Laundering, the fight against Terrorist Financing, and International Sanctions.



CHAPTER 5

Speak Up Line

CHAPTER 5.

Speak Up Line

Suppliers and Organizations may report any breach of our standards of conduct through our Speak Up Line channels. The treatment of complaints through these institutional channels guarantees absolute confidentiality. The Organizational Ethics department of Genera is responsible for guaranteeing to the whistleblowers the confidential handling of the all the information gathered from every complaint, the resolutions given to them, the execution of the corresponding investigation for every reported fault, as well as the implementation of the necessary anti-retaliation measures, in accordance with our **Whistleblower Protection Institutional Guidelines (Lineamientos institucionales para la protección a denunciantes)**, respecting every person's dignity at all times.

Before making any type of consultation or report regarding the Code, the following recommendations should be considered:

1. Think very well before acting and evaluate whether our perception of the facts is correct.
2. Consult this Code of Ethics and Conduct to identify which conduct is being violated.
3. Proceed with confidence, communicating our decision through the institutional reporting channels.
4. Provide elements of time, manner, and place, as well as evidence, witnesses, and details to which one has had access on one's own account, without forcing a third party and without performing actions that may represent an illicit act.
5. To maintain absolute confidentiality. Do not comment with anyone else about our approach to the Speak Up Line, as it puts at risk the integrity of those involved, the confidentiality of the subject, as well as the investigation process.

We know that honesty is an especially important value, so these reports must be made in an objective, well-founded and substantiated manner, providing sufficient evidence to prove the reported fact¹³.

As a Supplier or Organization that collaborates with Genera, you can make use of our Speak Up Line:

- Email:
 - **Mexico:** denuncia@lineaetica.info
 - **Peru:** denunciacf@lineaetica.info
 - **ConCrédito only:** denunciacc@lineaetica.info
- Hotline (toll free, 365 days a year, 24 hour a day):
 - **Mexico:** 800 230 6363
 - **Peru:** 705 2233

¹³ In Mexico, the Ministry of Labor and Social Welfare (*Secretaría de Trabajo y Previsión Social*) requires every company to fulfill the regulation NOM-035-2018, and guarantees them to provide them with support and follow up of the reported faults, as well as the confidential handling of every single one of them.

- WhatsApp (available 365 days a year, 24 hour a day):
 - **(+52) (55) 6538 5504**
- Web page:
 - **Mexico:** <https://denuncia.lineaetica.info/>
 - **Peru:** <https://denunciacf.lineaetica.info/>
 - **ConCrédito only:** <https://denunciacc.lineaetica.info/>

Each website includes access to a real-time chat with personalized assistance and the necessary information to download and use the *Ethics Global* mobile app for our **companies in Mexico or Peru, as applicable**.



Commitment Letter

Genera’s Code of Ethics and Conduct for Suppliers and Organizations

I, _____, legal representative
of _____, hereby certify that
I have received and read, and that I fully understand the content, scope and effect of each of the
guidelines set forth in the Code of Ethics and Conduct for Suppliers and Organizations of Genera
("the Code") in effect as of the date hereof. Therefore, through the acceptance of this Commitment
Letter, I state that it is my will and commitment to always comply with the guidelines of the Code, as I
understand and recognize that by means of this Code, Genera seeks to establish valuable relationships,
as well as to strengthen respect and compliance with the laws that apply to us.

I also undertake to share this Code with the collaborators of the organization I represent, so that
they are aware of the criteria and conduct with which we must act at Genera.

Having read and understood the contents, scope and effects of this Commitment Letter and the
Code, I hereby declare my conformity and acceptance, dated _____, _____, at
_____.

I agree to the above
Name and signature of the legal representative



GENTERA®

Appendix 1 Comprehensive Privacy Notice for Suppliers of Gentera Companies

In accordance with the *Federal Law on the Protection of Personal Data Held by Private Parties*, we inform you that GENTERA S.A.B. de C.V. (hereinafter “GENTERA”) 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 *FinCremantar S.A. de C.V.*), and Fundación Gentera A.C. (hereinafter “Fundación Compartamos”), with address at Insurgentes Sur No. 1458, 7th Floor, Colonia Actipan, Benito Juárez Borough, Zip Code 03230, Mexico City, are responsible for the use and protection of your personal data; in this regard, we inform you the following:

What purposes will we use your data for?

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

- To identify you and verify your identity;
- To create and update your file;
- To execute the contracting of services/products;
- To record your information and keep updated our database;
- To certify you as a supplier;
- To retain your information for compliance with legal provisions and requirements from various authorities and/or regulatory entities;
- To comply with customer due diligence and anti-money laundering provisions;
- To comply with the provisions set forth at the service agreement during the term of the contractual relationship;
- To comply with and follow up on internal regulations and reported fraud cases;
- To manage the payment of contracted services/products;
- To conduct investigations to verify, through contracted third parties, authorities or agencies, the truthfulness of the information provided by you; and
- Video surveillance for your safety and the safety of those visiting us.

Additionally, and for secondary purposes, we will use your personal data for the following purposes that are not necessary to carry out or maintain the contractual/commercial relationship but allow us to conduct “Supplier Sustainability”:

- To invite you to participate in our surveys and gather your feedback;
- To prepare statistics and data analysis.

If you do not wish your personal data to be processed for the additional purposes stated in this privacy notice, you may express your refusal through the website www.gentera.com.mx in the Privacy Notices/ARCO Rights section.

Refusal to use your personal data for secondary purposes shall 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 your personal data under the following categories:

- Identification
- Contact
- Address/Domicile
- Employment
- Financial/Assets

We inform you that, in accordance with this privacy notice, GENTERA and/or Fundación Compartamos 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, quality, consent, information, purpose, loyalty, proportionality, and responsibility as described and/or established in the aforementioned Law.

Use of Cookies

We inform you that our platform uses cookies. The data collected through this technology include user ID, session ID, region of access, browser information, operating system information, date and time of session start and end, websites visited, searches performed, and ads viewed. The purpose of collecting this data is to provide a better browsing experience on our platforms.

These technologies and/or location tracking can be disabled by following the respective procedures for each browser; however, please note that disabling them may limit the functionality of our platforms.

To obtain more information about these technologies, please refer to the following links:

- <https://support.google.com/accounts/answer/61416?hl=es-419>
- <http://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>

Who do we share your personal information with and for what purposes?

We inform you that, in accordance with personal data protection legislation, your personal data may be transferred to third parties without your consent, but only under the following circumstances: (i) when provided for in a law or treaty to which Mexico is part of; (ii) when necessary for medical prevention or diagnosis, the provision of health care, medical treatment, or the management of health services; (iii) when carried out between entities controlled by, subsidiaries of, or affiliates under common control of GENTERA and/or Fundación Compartamos, and operating under the same internal processes and policies; (iv) when necessary due to a contract executed or to be executed in your interest, between

the data controller and a third party; (v) when necessary or legally required to safeguard public interest, for the administration or pursuit of justice, or to comply with the requirements of the corresponding authority; (vi) when necessary for the recognition, exercise, or defense of a right in a judicial proceeding; and (vii) when necessary for the maintenance or fulfillment of the legal relationship between any of the GENERA companies and/or Fundación Compartamos and you.

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 hold about you, what we use it for, and the conditions under which we use it (Access). Likewise, you have the right to request the correction of your personal data if it is outdated, inaccurate, or incomplete, by providing the documentation that supports your request (Rectification); to have your data removed from our records or databases when you believe it is not being used in accordance with the principles, duties, and obligations established by applicable regulations, or when it has fulfilled the purpose it was collected for (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 between you and us (Objection). These rights are known as ARCO rights.

To request the exercise of your ARCO rights, you must meet the following requirements:

The person submitting the request must be the Owner of the personal data or their legal representative. In either case, identity must be verified through official documentation (Personal ID, Passport, Military Card, or Professional License); if a legal representative is acting on behalf of the Owner, their identity and legal authority must be demonstrated by attaching the appropriate documentation to the request (Public Instrument: Power of Attorney, Personal Statement before an authority, or, if applicable, a Letter of Authorization signed before two witnesses).

In addition to the documentation proving identity and legal representation, the request must include a clear and precise description of the personal data for which you seek to exercise any of the aforementioned rights and, if applicable, any other element or document that facilitates locating the personal data. The documentation required will vary depending on the specific right you intend to exercise and must comply with the terms established in the Federal Law on the Protection of Personal Data Held by Private Parties.

To exercise any of your ARCO rights, you must properly complete the “ARCO Rights Request” form available on our website www.gentera.com.mx, in the section Privacy Notices / ARCO Rights, indicating, among other things, the mechanisms you wish to receive a response 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 solely for secondary purposes, that is, those that are not necessary as specified in this Privacy Notice. However, please note that for those purposes which are necessary (primary purposes) and give rise to the legal relationship you have with us, we may not be able to process your request or cease the use of your data immediately, as we may be legally required to continue processing your personal data. Additionally, you should consider that, for certain secondary purposes, revoking your consent may prevent us from continuing to inform you and/or considering you for such purposes.

To revoke your consent, you must properly complete the “ARCO Rights Request” form available on our website www.gentera.com.mx, in the section Privacy Notices / ARCO Rights, indicating, among other things, the means by which you wish to receive a response to your request.

Procedure, response time, and questions about the exercise of ARCO rights and consent revocation

The Privacy Officer will verify that the information provided by the Data Subject is sufficient and complete. If the request meets the requirements, the response period will be twenty (20) business days from the date of receipt of the request. It is important to note that under the Federal Law on the Protection of Personal Data Held by Private Parties, this period may be extended once for an equal period if the circumstances of the case so justify.

On the other hand, if the information provided in the request is insufficient or incorrect to process it, or if the necessary and essential documents are not included, the Privacy Officer may request, within no more than five (5) business days, the additional information and/or documentation needed to process the request. You will then have ten (10) business days from receipt of the request to provide the required documentation. If you do not respond within this period, your request will be filed as not submitted. If your request is accepted, you will be notified and provided with a response within the following fifteen (15) business days. It is important to note that under the Federal Law on the Protection of Personal Data Held by Private Parties, this period may also be extended once for an equal period if the circumstances of the case so justify. The method or medium through which you may obtain the personal data requested under the right of Access may include physical copies, electronic documents, or any other medium selected in the “ARCO Rights Request” form.

If you have any questions about the procedure and requirements for the exercise of ARCO rights or revocation of consent, you may contact the Privacy Officer, who will handle the requests for the exercise of such rights and respond to any inquiries regarding the processing of your information. The contact details are as follows:

- Authorized party to help: Privacy Officer.
- Address: Insurgentes Sur No. 1458, PB (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 learn about changes to this privacy notice?

This privacy notice may be subject to modifications, changes, or updates due to new legal requirements; changes in our processes or services; privacy practices; and/or changes to our business model. We are committed to keeping you informed about any changes to this privacy notice through our website www.gentera.com.mx, in the Privacy Notices section.

The procedure through which notifications about 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 announcing the changes and/or updates to this privacy notice.
- Once the change and/or update has been published through the aforementioned means, it will take effect on the day following its publication.

To learn more about the companies that 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
Genera's Board of Directors on July 23, 2025