

Code of Ethics and Conduct for Suppliers and Organizations



GENTERA[®]

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Message from our CEO

Dear Suppliers and Organizations,

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

We believe that, regardless 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.

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,



Enrique Majós Ramírez
CEO of Genera

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 companies 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 therein³.

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 clients’ 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 Labor Organization (“ILO”), and the applicable labor laws of the countries where we operate⁴.

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 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 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.

⁴ 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 Genera
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 Genera, 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.



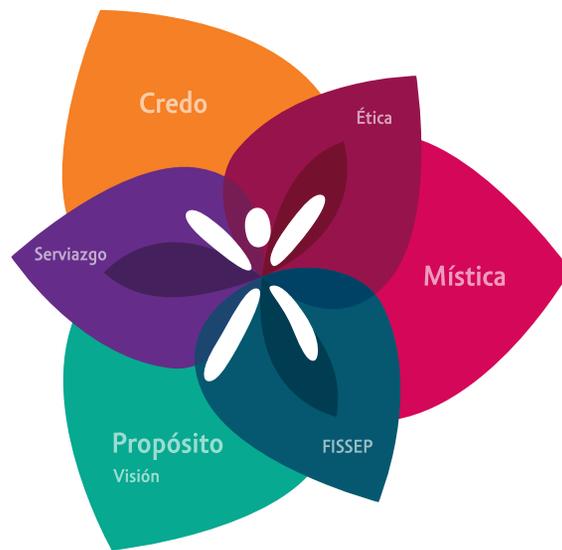
CHAPTER I

Our Philosophy

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 to inspire and transform, 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

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, either formally or informally, in a respectful, informative, and honest manner, in accordance with our Philosophy.
- 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 work tools provided by Gentera with third parties, such as computer equipment, telephones, cell phones, tablets or mobile or computer devices, users, and passwords with access to Gentera's information systems.
- 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 our families⁶ or related third parties⁵, 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 Genera.

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 Genera.

To avoid any conflict of interest, Genera'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 Genera. 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 Genera.

Any situation that constitutes or could give rise to a conflict of interest should be avoided and reported immediately via e-mail to conflicto de intereses@genera.com.mx, and follow Genera'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 Genera, as well as to their relatives and related third parties, by any electronic or physical means, to their private address or to any facility of Genera 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 Genera, either in cash or in kind.
4. Performing activities that cause conflict or prevent the fulfillment of the objectives they have with Genera as Suppliers and Organizations.

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

⁵ 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).

⁶ Third parties: friends or people related by a sentimental or friendship bond, rather than by blood or affinity. For example, boyfriend, girlfriend, godfather, godmother, godchild, by cronyism, among others.

1. They may not be hired when their legal representatives or members have a family relationship (blood relationship up to the second degree) 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 legal representatives 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.

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.

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 it.

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:

- a.** Any financial, banking, accounting, legal or business operations information from the Owners of the personal data related to Genera and its companies.
- b.** 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.
- c.** 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.
- d.** The results of any analysis, test, projection and new projects of any kind or nature.
- e.** 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.
- f.** Compensation policies, salaries and paying structures of Genera.
- g.** Any information or content of the contracts, negotiations or agreements made by Genera.
- h.** Any accounting, financial, fiscal, legal, strategic, or business information of Genera.
- i.** Any information that may be considered a business secret of Genera.
- j.** Any information entailing a commercial, competition, economic or business advantage to Genera in relation to third parties.
- k.** Any kind of database, policy, code, guideline, agreement, protocol, regulation, provision, contract, or internal standard created by Genera.

Specifically, the Suppliers must sign a confidentiality agreement with Genera before receiving internal information for the performance of the service or project for which they are being consulted or hired.

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.



CHAPTER 3

Conduct with our clients

Conduct with our clients

Our client protection promise

For all of us who work at Genera, 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.

In order to offer responsible finance, it is fundamental for Genera 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 persons in the underserved segment.
- 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:** client data is protected in accordance with the standards and requirements of the laws established in the banking secrecy and the applying laws in Mexico⁷ 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.

In coherence with the protection promise we have made, the Suppliers and Organizations shall act accordingly, where this promise applies to the services or projects they perform, and respect at all times the rights and obligations of Genera's clients, partners, or commission agents.

⁷ In Mexico: Ley Federal de Protección de Datos Personales en Posesión de Particulares.



CHAPTER 4

Conduct with society

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 1 of Peru's Federal Law to Prevent and Eliminate Discrimination⁸ (*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*).

At Genera we value diversity, recognizing the contributions that everyone can make to achieve our objectives and maintain healthy relationships with the Suppliers and Organizations.

- 5. Salaries, benefits and working hours.** The working hours of the Suppliers' and Organizations' collaborators will not exceed the maximum allowed by the local legislation in force, and their remuneration shall comply with the local salary legislation, ensuring an adequate standard of living.
- 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.

Relationship with the environment

Adicionalmente Proveedores y Organizaciones, de acuerdo con el alcance de sus actividades, deberán:

- 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.**

⁸ 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 rights and dignity.

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. Soborno:** 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.

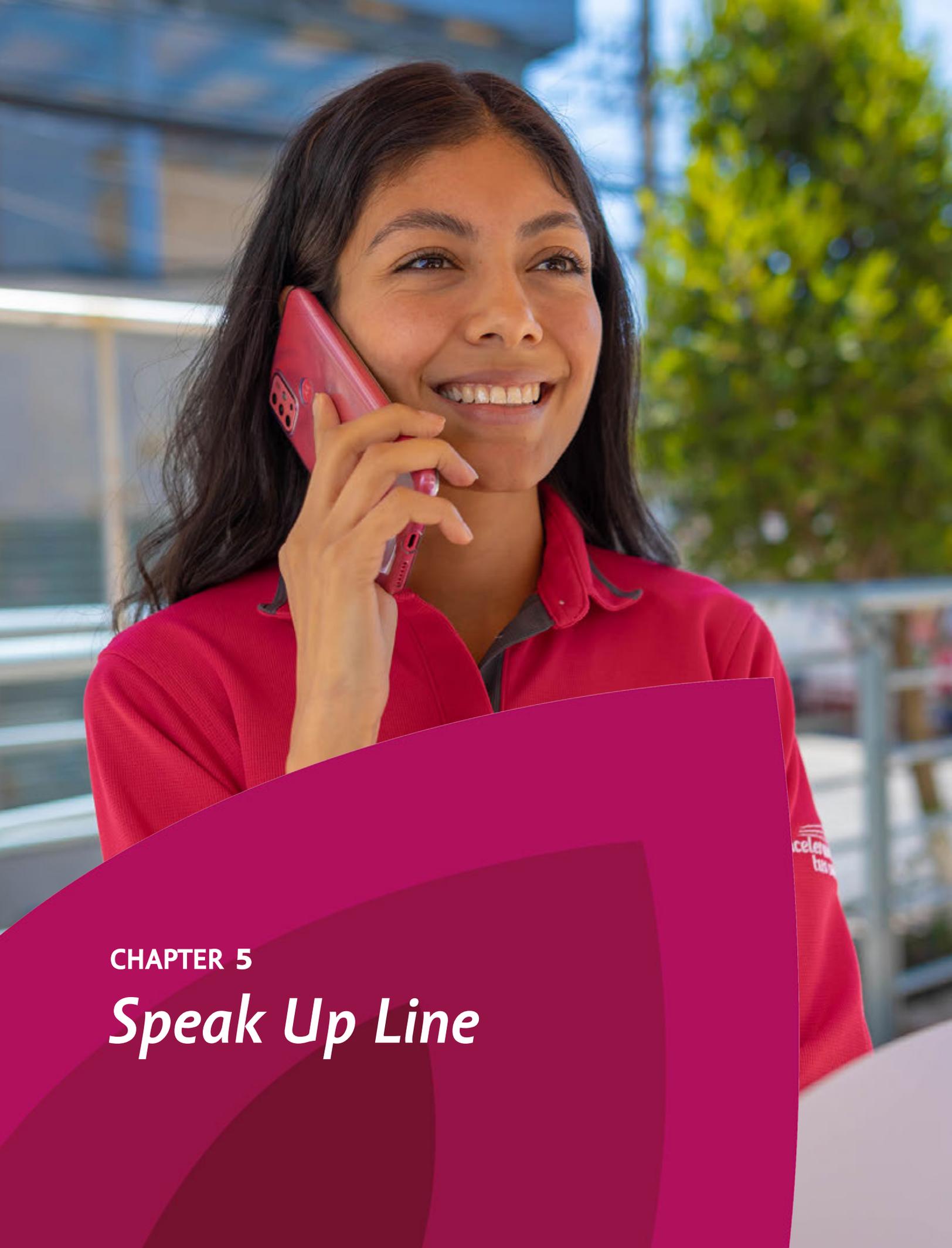
Corruption practices not only constitute a violation to this Code, but they may also imply a severe violation to civil, administrative, and criminal anti-corruption laws at the countries where Genera operates.

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 area specialized in these issues, called “Anti - Money Laundering,” which is in charge of the Compliance Officer. This area is in charge of reviewing all those persons who intend to enter into a contractual relationship with Genera or any of its companies, as well as ensuring that the Organizations with which it has a relationship fully comply with the applicable laws on Anti-Money Laundering and Terrorist Financing, and through its whistleblower channels, it handles reports from Genera’s collaborators regarding Unusual, Worrying and Suspicious Internal Transactions that they identify.



CHAPTER 5

Speak Up Line

Speak Up Line

These are the channels through which the Suppliers and Organizations can report any breach of our standards of conduct. The treatment of complaints through the 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.

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 fact⁸.

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

- Correo:
 - **Mexico:** denuncia@lineaetica.info
 - **Peru:** denunciacf@lineaetica.info
- Telephone numbers (toll-free):
 - **Mexico:** 800 230 6363
 - **Peru:** 705 22 33
- WhatsApp:
 - (+52) (55) 6538 5504
- Web site:
 - **Mexico:** <https://denuncia.lineaetica.info/>
 - **Peru:** <https://denunciacf.lineaetica.info/>

On every website you will find a live support chat that provides personalized attention, information to download the ReportChannel app and a code to sign-in. This applies to our companies in Mexico or Peru.

⁸ 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.

Commitment Letter
Gentera'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 Gentera ("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, Gentera 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 Gentera.

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



Anexo 1:

Comprehensive Privacy Notice for Suppliers

Pursuant to the *Ley Federal de Protección de Datos Personales en Posesión de los Particulares*, our federal legislation regarding the collection and protection of personal data (hereinafter, the “Law”), we inform you that GENTERA S.A.B. de C.V. (hereinafter “GENTERA”) and its companies (ATERNA Agente de Seguros y Finanzas, S.A. de C.V.; Banco Compartamos, S.A. de C.V., Institución de Banca Múltiple,; Compartamos Servicios, S.A. de C.V.; Fundación Gentera A.C.; and Red Yastas, S.A. de C.V.), all of them domiciled at Insurgentes Sur número 1458, piso 7 , Colonia Actipan, Alcaldía Benito Juárez, C. P. 03230, Mexico, Mexico City, are responsible for the use and protection of your personal data; in that regard, we inform you the following:

For what purposes will we use your data?

We will use the personal data collected from you for the following purposes, necessary for our hiring process:

- To identify you and to corroborate your identity.
- To integrate and update your file.
- To hire the services/products.
- To register the information and to keep our database updated.
- To certify you as supplier.
- To keep your information for the compliance of the legal provisions and requirements of different authorities and/or regulatory entities.
- Compliance of the provisions of customer knowledge and money laundering prevention.
- To comply with the provisions of the service provision agreement during the term of the contractual relationship.
- To comply and follow-up on the internal regulations and alerts of potential frauds.
- To manage the payment of the contracted services/products.
- To conduct the research in order to verify through third parties contracted therefor, dependency or authority, the truthfulness of the data you provide us; and
- Video-surveillance for your safety and of the persons that visit us.

Additionally, for secondary purposes, we will use your personal information for the following effects, which are not essential for settling or maintaining the contractual/commercial relationship, but let us carry out the “Suppliers’ Sustainability”:

- Invite you to take part in our surveys and know your opinion.
- Compile statistics and information analysis

Should you decide not to let your personal information be handled for the additional purposes established in this notice, you may express your denial as of now, by sending an electronic mail to the Privacy Officer as follows: oficialdeprivacidad@gentera.com.mx.

Your refusal to the handling of your personal data for said secondary purposes will not be a reason for limiting or concluding the contractual/commercial relationship.

What personal data will we use for these purposes?

- Personal data.
- Equity and/or financial personal data.

We inform you that, pursuant to the provisions of this privacy notice, GENTERA will not request your sensitive personal data in terms of the Law.

The treatment of your personal, patrimonial/financial information will be carried out based on the principles of legality, quality, consent, information, purpose, loyalty, proportionality, and responsibility enshrined in the Law.

Use of Cookies

We inform you that our platform uses cookies. The data collected through this technology are the user ID, session ID, region you are accessing from, browser information, information on the operating system; date and start and end time of the session; visited websites, conducted searches, and consulted advertising.

The purpose for which the aforementioned data are collected is to offer you a better browsing experience on our platforms.

These technologies may be disabled by following the respective procedures of each browser; however, you must consider that disabling them could cause you not to obtain the full performance that the platform may offer.

To obtain more information on these technologies you may access the following sites:

- <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/habilita-y-deshabilita-cookies-sitios-web-rastrear-preferencias>

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

We inform you that pursuant to the legislation on terms of protection of personal data, we are authorized to transfer your personal data to third parties, without obtaining your consent, in any of the following assumptions: (i) such transfer is provided for in a Law or Treaty to which Mexico is a party; (ii) it is necessary for the prevention or medical diagnosis, or the presentation of health assistance, medical treatment or the management of health services; (iii) is made to controlled

companies, subsidiaries or affiliates under common control of GENTERA and that operate under the same internal processes and policies; (iv) is necessary by virtue of an agreement entered into or to be entered into in its interest by the responsible party and a third-party; (v) is necessary or legally required for safeguarding a public interest, or for the procurement or administration or enforcement of justice, or for complying with the relevant authorities requirements; (vi) is required for the acknowledgement, exercise, or defense of a right in a court proceeding; and (vii) is required for maintaining or fulfilling the legal relationship between any of the companies of GENTERA and yourself.

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

How can you access, rectify, or cancel your personal data, or oppose to their use.

You have the right to know what personal data we hold about you, what we use it for and the conditions of the use we make of it. (Access). Likewise, it is your right to request the correction of your personal information in case it is outdated, inaccurate or incomplete (Rectification); to have it removed from our records or databases when you consider that it is not being used in accordance with the principles, duties and obligations set forth in the regulations (Cancellation); as well as oppose the use of your personal data for specific purposes (Opposition). These rights are known as ARCO rights.

To exercise any of your ARCO rights, you must duly fill out the electronic form that we make available for you through our website www.gentera.com.mx, or by means of a free written request addressed to the Privacy Officer, by sending it to the following e-mail address: oficialdeprivacidad@gentera.com.mx.

To clarify doubts about the procedure and requirements for the exercise of the ARCO rights, you may contact the Privacy Officer, who will process the requests for the exercise of these rights and will answer any questions you may have regarding the treatment of your information. The contact information is as follows:

- Authorized officer to provide assistance: Privacy Officer
- Domicile: Insurgentes Sur número 1458 PB (Recepción GENTERA), Colonia Actipan, Alcaldía Benito Juárez, C.P. 03230, México, México City.
- E-mail address: oficialdeprivacidad@gentera.com.mx

For the request to exercise your ARCO rights, you should consider the following requirements:

The requesting party must be the Data Holder, or its legal representative; thus, in both cases documentary proof of identity is necessary (ID Card, Passport, Military Service ID Card, Professional License Card). In the case of the existence of a legal representative, his/her identity must be proven

by presenting the capacity with which he/she appears, attaching the supporting documents to the request (Public Instrument: Notarial Power of Attorney, Statement in Personal Appearance of the data holder or, where appropriate, Letter Proxy executed before two witnesses).

The name of the data holder as well as the means to inform you the response to your request must be indicated.

In addition to the documentation that proves your identity and capacity, a clear and precise description of the personal data with respect to which you are seeking to exercise any of the aforementioned rights is required, and if applicable, any other element or document that facilitates the location of the personal data; likewise, the documentation that is required according to the right you wish to exercise and in the terms provided by the Law must be considered.

You must consider the following details in order to exercise each of the ARCO rights:

ACCESS: Indicate the data you wish to have access that you believe are in our database.

RECTIFICATION: Indicate the specific modifications to be made, attaching the documents that support your request.

CANCELLATION: Refer the personal data you require to be cancelled.

OPPOSITION: Specify the personal data you wish to object to their processing and the reason for the damage we are causing you by processing them.

In the event that the information provided in the request is insufficient or erroneous to meet the request, or if the necessary and essential documents are not provided, the Privacy Officer may request, within a period not exceeding 5 business days, the information and/or documentation necessary to process the request. Therefore, you will have 10 business days following the receipt to respond to such request.

In the event the information provided in the request is sufficient, the time to issue a resolution corresponds to 20 (twenty) business days from the date on which the request was received.

It is important to mention that in terms of the Law, the aforementioned term may be extended only once for an equal period, provided that it is justified by the circumstances of the case.

If the resolution to your request is admissible, once you have been notified, it will be effective within the following 15 business days. This period may be extended only once for an equal period, if justified by the circumstances of the case, which will be made known to you through the previously chosen contact means.

The form or means of reproduction through which you may obtain the information or personal data requested by exercising the access rights corresponds to the issuance of simple copies, electronic documents, or any other selected means.

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

You may revoke the consent you have given us for the processing of your personal data. However, it is important to note that not in all cases we will be able to fulfill your request or immediately terminate the use, since it is possible that for some legal obligation, we may need to continue processing your personal data.

Furthermore, you must consider that, for certain purposes, the revocation of your consent would imply that we are no longer able to provide you the service you requested, or the conclusion of your relationship with us.

To revoke your consent, you must duly fill-out the electronic form available at www.gentera.com.mx.

To clarify doubts on the procedure and requirements to revoke your consent to the processing of your Personal Data, you may contact the Privacy Officer, who shall process the requests of Revocation of Consent, and shall address any question you may have regarding the processing of your information. The contact data are the following:

- Authorized officer to provide assistance: Privacy Officer
- Domicile: Insurgentes Sur número 1458 PB (Recepción GENTERA), Colonia Actipan, Alcaldía Benito Juárez, C.P. 03230, México, México City.
- E-mail address: oficialdeprivacidad@gentera.com.mx

In order to make the request for Revocation of Consent, it is essential that the person making the request must be the Data Holder or his/her legal representative; thus, in both cases documentary proof of identity is necessary (ID Card, Passport, Military ID Card, Professional License ID Card). In the case of the existence of a legal representative, his/her identity must be proven by presenting the capacity with which he/she appears, attaching the supporting documents to the request (Public Instrument: Notarial Power of Attorney, Statement in Personal Appearance of the data holder or, where appropriate, Letter Proxy executed before two witnesses).

The time to issue a resolution to your request will be delivered to you within 20 (twenty) business days from the date of receipt of your request.

How can you become aware of the changes to this privacy notice?

This privacy notice may be modified, changed, or updated as a result of new legal requirements; or due to changes in our processes or services we offer, or our privacy practices, or changes to our business model.

We commit ourselves to keep you informed on the updates to this privacy notice, through our website www.gentera.com.mx, in the Privacy Notices section.

The procedure through which the notifications about changes and/or updates to this privacy notice will be carried out is as follows:

Banners on GENTERA's website, notifying the changes and/or updates to this privacy notice.

Once the change and/or update of this privacy notice is published in the aforementioned means, said change and/or update shall become effective on the day following its publication.

To learn more about the companies that are part of GENTERA you may go to www.gentera.com.mx

Ética



El presente Código de Ética y Conducta
fue aprobado por el Consejo de Administración
de Gentera el 26 de julio de 2023