

**hey,**

**banregio**

# **regional**

**Institutional  
Code of Conduct**

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# Pact for honesty

**I hereby,** \_\_\_\_\_

As a fundamental part of the Banregio Family, I know that my attitude and service quality build trust and generate value for our Clients and the Institution.

This is why I commit myself to know, accept, respect and comply this Code of Conduct.

I am responsible for the decisions I take on a daily basis and for upholding our values.

I commit myself to be an example for my family, in my work and within my community, by behaving honestly.

**Sign the pact here:**

<https://forms.gle/kKX3QGYLLaKJu6hY6>

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# Message from the CEO of Regional

*Dear coworkers:*

*The key to our growth is focused on innovation: our products and services respond to the needs of today's Clients, which is why doing things right and adopting this Code of Conduct is essential.*

*We have significant responsibilities towards our Clients and the Community, thus it is important to conduct ourselves with integrity, prudence and transparency, in order to safeguard the trust and assets entrusted to us by our Clients, Collaborators, Suppliers and Partners.*

*We need to commit ourselves to know, accept, respect and comply with this Code of Conduct in our daily activities and sharing it with our coworkers, thereby promoting a Culture of Compliance and Control.*

*Rest assured that your voice will be heard on an anonymous and confidential basis through our reporting channels.*

*I invite you to maintain a positive and inclusive work environment, to do what is right and to embody our values and principles setting an example of honesty for our colleagues, family and Community.*

A portrait of Manuel G. Rivero Zambrano, a man with dark hair and a beard, wearing a light blue shirt and a grey blazer, smiling. The background is a light blue gradient.

**Manuel G. Rivero Zambrano**  
*Regional Chief Executive Officer*

# Message from the CEO of Banregio

*Dear family:*

*Banregio has stood out for its quality of service, part of this success stems from adopting the best practices of the financial system since the Institution's inception, as well as of the bankers who joined the first generation, leaving a legacy of honesty and values.*

*It is up to all of us to continue reinforcing that commitment and that our actions are guided by this Code of Conduct as well as the Institution's policies and procedures, ensuring transparency within the organization.*

*We know that corruption is one of the oldest afflictions in the country, therefore, in Banregio we do not tolerate bribery or corrupt acts, which is why we created the Institutional Conduct Committee, which ensures the appropriate handling and monitoring of integrity and conduct cases to minimize any patrimonial and reputational risks.*

*I invite you to continue upholding the name of Banregio, enforcing this Code with our actions of integrity and honesty.*

A portrait of Héctor Cantú Reyes, the CEO of Banregio. He is an older man with white hair and a mustache, smiling. He is wearing a dark blue suit jacket over a light blue patterned shirt. The background is a blurred outdoor scene with trees and a building.

**Héctor Cantú Reyes**  
Banregio Chief Executive Officer

## Purpose

Our Clients' Success.

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## Vision

To be a bank in tune with the community.

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We aim to be the bank with the best customer service and to continue achieving success in order to generate a positive change in our community, for that we need your commitment, knowing, living and making yours our institutional values day by day.

## Our Values



### Human

We value people and place them at the center of all our actions.



### Prudent

Our strength, within a dynamic and competitive environment, has been forged mostly because of our prudence in decision-making.



### Relevant

We aim to generate an impact. Our value proposal is relevant to peoples' lives and to the performance of our country.



### Leader

Ensuring us that what we do, is the best. We can create great things if we live our lives with energy and with a purpose that exalts us.



### Openness

We believe that an open dialogue allows people to contribute in generating ideas and proposals to promote innovation and creativity.

We invite you to adopt and transmit our values.

# What does Banregio expects from you?

## To be upright and honest

May your actions be aligned with our Code of Conduct with honesty, responsibility, trust, loyalty, sense of belonging and zero tolerance for corruption.

## Connect with our values

Adopt and transmit the Institutional Values. Your positive example transcends and inspires your Family, your Community and the Institution.

## To Adopt the Culture

Contribute to strengthening the culture of compliance and control together, make sure to carry out the activities that your position requires in accordance with internal policies, procedures and regulations.

## To be an innovator

Adapt to a rapidly changing environment. Observe and respond quickly to the needs of our Customers.  
Be proactive.

## To be committed

Be a team player and wear our colors, remember that you are part of the success and growth of the Institution, commit yourself every day to give your best.

# Banregio commits to:

- Improve our community.
- Promote collaboration.
- Maintain an effective communication.
- Strive for the Collaborator's well-being.
- Find the balance between your family and professional life.
- Generate equal opportunities for professional growth based on merits.
- Maintain constant innovation.
- Continue to reap success.

**Our Collaborators are key to the Institution, they represent an outstanding source of talent and make operations possible in accordance to our values.**

We work  
continuously  
in order to create  
an **excellent place**  
to work in.





# Doing the right thing benefits us all

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The Code of Conduct is one of the means that underpins our culture, which is why its compliance has the following benefits:

## **Build Trust for Everyone**

All business is built upon relationships with Clients, Collaborators, Suppliers and other groups. The bond and strength of those relationships rely, to a great extent, on the trust that the parties have with each other. In this regard, integrity conduct is an indispensable factor for building trust as it has the ability to give credibility to those who practice it.

## **Attracting good Clients, Collaborators, Suppliers and Partners**

Respecting current laws and regulations, acting in accordance with internal policies and procedures, refraining from misleading or omitting information, complying with what is offered and behaving with integrity and honesty are all actions that attract people who tend to behave in the same manner because they feel identified with those principles.

## **Protection against Reputational Risk and Negative Advertising**

When activities are conducted in accordance with best practices of corporate integrity, it is difficult for negative publicity to occur. Therefore, integrity behavior safeguards the Institution against negative publicity, minimizes reputational risk and adds value to our brand.

## **Staff Satisfaction**

The Code of Conduct helps Collaborators to identify what the Institution acknowledges as acceptable business practices, leading to better decisions, greater fidelity and pride in being part of the Banregio Family, therefore creating a positive organizational culture and carrying out its activities in the best possible manner.

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It's worth noting that each Collaborator, Manager, Partner, Shareholder and Director are bound to this Code of Conduct as a commitment to a culture of compliance and zero tolerance for corruption.

Integrity is strengthened in the Institution through the Institutional Code of Conduct, in conjunction with the policies and procedures that govern us, our Transparency Mailbox, the System of Consequences and the Institutional Conduct

Committee, which aims to provide safety to Collaborators in the handling and monitoring of integrity and conduct conflicts, strengthen the organizational culture based on our Institution's values and ultimately to address and make decisions regarding events identified as deviations to the norm.

# How to make better decisions?

Think on those things that you can improve in the way you act and the tasks you perform in your work. Remember that our decisions always have an impact, positive or negative, big or small.

If you are unsure about something before making a decision, consider the following:

- Am I authorized to do this?
- Does my action adhere to the Code of Conduct, Internal Work Regulations, policies, processes and applicable legislation?
- Is my action consistent and reflective of institutional values?
- Does my behavior enhance my reputation and that of the Institution?
- Would I like this to be posted on social media?
- Am I ready to assume the consequences that my action could have?

If any of these questions are answered with “No” or “I’m not sure,” stop and consult with your Leader or supporting areas.



Show  
your **passion**  
to serve.



# 1 Customer Service



## One of the pillars

that distinguishes us as a Bank is our level of service and customized attention.

Over the last two decades, we have managed to position Banregio as one of the strongest banks regarding the provision of consultancy and financing services to the entrepreneur of small and medium-sized companies, this is due to the commitment, effort and especially to the constant confidence of our Clients, Collaborators, Suppliers and Partners.

Nowadays our challenge is to be relevant through the digital channel, seeking financial alternatives to drive an integral and close relationship to be our Clients' main bank.

### Empathic Service

Practice active listening and understand our internal and external Clients based on their needs (not solely from our business interests).

### Humane Service

We are all human beings, without any distinction. Let's acknowledge this fact, embrace it, and perform our work under the premise that people are always the most important.

### Assertive Service

It is our responsibility to understand how the Institution can become the best vehicle to strive for peoples' well-being and business growth; only then, can we provide solutions to their needs with products that are in tune with them.

### Genuine Service

Each interaction we have with different persons is an opportunity to build trust and value.



## Products and Services

When offering products and services to our Clients or Prospects, you must ensure that the information provided is truthful and verifiable, while also taking into consideration the promotions of financial transactions and services that are offered through any means.

Be transparent about the features of the products and services offered by the bank without hiding their risks, fees, other costs. Do not use deceitful information that might lead to misunderstanding about the financial transactions or services.

You must not condition the contracting of financial transactions or services to another transaction or service, unless they belong to a comprehensive service package communicated to the Client or Prospect.

## Relations

### Suppliers

If you come into contact with Suppliers while performing your duties, any operation you conduct must be based upon and be conducted with independency and integrity.

As a Collaborator you must not participate nor tolerate any act of corruption from a Supplier, nor should you utilize the Supplier as a conduit to corrupt practices. The contracting of Suppliers and Third parties should only be done for the proper operation of the Institution and they should be remunerated only for the legitimate products and services provided, without exceeding.

Likewise, the Institution will refrain from operating with Suppliers and Third parties when there is knowledge or suspicion of bribery or any other act of corruption on their part.

The Institution commits to conducting bids, contracts, and purchases in a transparent manner, in accordance with internal regulations and policies as well as business standards. Therefore any form of influence peddling by a Collaborator or Executive is prohibited, this includes, offering, promising or exerting influence to obtain a contract or bid.



### Authorities and Third Parties

You must provide special attention to the information requests made by the competent authorities ensuring that the information is provided on time and form, through the corresponding authorized departments.

If you receive an information request and you are not authorized to answer it, you must notify your Superior so that he/she can forward it to the corresponding personnel.

Collaborators must refrain from making facilitation payments to public officials, which are illegal. Facilitation payments are illegal payments to public officials with the purpose of expediting or securing some routine or necessary government process, to which the payer is legally entitled. In the event of coercion or when the integrity and security of the Collaborator are at risk, it must be accurately documented and registered.

### Subsidiaries

While carrying out your activities for another entity within Regional, S.A.B. de C.V. and its subsidiary Banregio Grupo Financiero, S.A. de C.V., you must execute them based on the guidelines contained in the corresponding Operation Manuals.

**If you have any doubts regarding the interpretation of provisions, please consult with the Compliance Department**

You must use the systems, information, tools, and all other infrastructure required by the Institution while maintaining at all times, strict compliance with the bank and fiduciary secrecy.

## Competence

You shall not:

- Communicate or disseminate information to discredit your competitors.
- Generate false conditions of demand or supply for any product or service with the purpose to artificially influence their prices.
- Engage in conversations about future plans related to fees, costs, tariffs, or other matters.
- Agree on allocating territories, Clients, or markets.

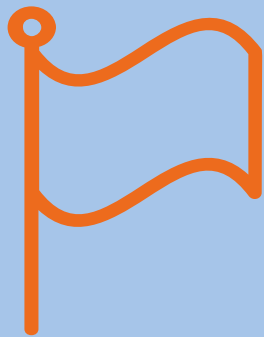


**See Manuals:**

- *Prevención de Conflicto de Interés BRGF-GOB-112*
- *Código de Conducta para Proveedores BRGF-GOB-114*
- *Compras Institucionales BRGF-RM-104*
- *Atención de Oficios y Requerimientos de Autoridades BRGF-AMD-107*
- *Reportes Regulatorios a Autoridades BRGF-ADM-106*







## Live the Value: **Relevant**

We seek to generate impact. Our value proposition is relevant to the lives of people and to people's lives and contributes to our country's performance.

Clients are the reason to be of any business, therefore, you must ensure that you are well-informed with the Institution's products and services so that our Clients feel that they are being properly taken care of, listen to them and find efficient solutions that facilitate their lives; only then you will offer a great service experience causing them to return with us.





## 2

# Inspire with your example, do the right thing

**Identify bad habits that may affect your professional performance.**

In order to promote good behavior and enhance efficiency in your activities, we provide you some recommendations to eradicate bad habits that frequently occur in your day to day:

- Respect the rules and processes.
- Avoid frequent distractions that impede executing your activities.
- Plan your assigned tasks to deliver them on time.
- Contribute to creating and maintaining a healthy and respectful environment.
- Be on time, respect your coworkers' time and be organized.
- Keep an open mind towards different opinions, learn to listen.
- Treat others as you would like to be treated.
- Avoid gossip and misunderstandings.
- Keep our facilities in good conditions.
- Take into account your collaborators' suggestions.
- Value your work.
- Respect others and promote a harassment-free and violence-free environment.

For us, it is important to foster a work environment that enhances your and your team collaborators' productivity. This environment must be based on cooperation, trust, integrity, respect and honesty.

Likewise, we seek to maintain a favorable organizational environment and develop a culture that ensures dignified and decent work, as well as the continuous improvement of working conditions to prevent psychosocial risk factors, in accordance with NOM 035 STPS 2018.



**See Manuals::**

- Reglamento Interior de Trabajo BRGF-GOB-103
- Reglamento de Uso de Instalaciones BRGF-SGD-101

## Human Rights for Human Dignity

Our commitment is to establish relationships and negotiations with Clients, Users, Collaborators and Suppliers in compliance with the fundamental rights established in the Declaration of the International Labour Organization and respecting internationally recognized human rights, which consider:

- Eliminating all forms of forced labor and slavery
- Eradicating the use of child labor.
- Ensuring that working conditions and environments meet current labor regulations.
- Maintain an environment free from discrimination and harassment, as well as dignified treatment and respect for human dignity.

We acknowledge that diversity enriches our teams, strengthens innovation, and fuels our growth. Therefore, we aim to ensure that in our diverse work environment the differences of each Collaborator are respected and valued. At the Institution, we embrace diversity with inclusion and equity, understanding these concepts as:

### Diversity

Refers to inherent differences or identities of all kinds, such as sex, gender, gender identity and gender expression, age, religious beliefs, sexual orientation, ethnic origin, physical or mental disability, socio-economic background and cultural customs, among others.

### Equity

Equal opportunities and responsibilities regardless of differences in sex, gender, gender identity and expression, age, religious beliefs, sexual orientation, ethnic origin, physical or mental disability, socio-economic background and cultural customs, among others.

### Inclusion

Refers to creating an environment that integrates people within the community and respects their differences and similarities, seeking that they contribute while they receive corresponding benefits from the community. It refers to respecting, listening to and effectively integrating all Collaborators of the Institution, under the framework of the same rights and obligations established in this Code of Conduct.

## Compensation Policy

The compensation philosophy is mainly focused on 4 pillars:

**Fair:**

In line with the responsibilities of each Collaborator, aligned with the market, and based on the best practices of the industry.

**Equitable:**

Based on each Collaborator's merits, to promote their professional and economic development.

**Inclusive:**

Available to all Collaborators equally, without any distinction of sex, gender, religion, disabilities, preferences, etc.

**Flexible:**

Provides decision making flexibility to each Collaborator through benefit options considering the diversity of needs and their life circumstances.

## Labor Equality and Non-Discrimination

We constantly work to eradicate any kind of discrimination and promote labor inclusion, in accordance with the Federal Law for the Prevention and Elimination of Discrimination (LFPED), the Institution strongly prohibits the mistreatment, violence, and segregation from managers and leaders of the Institution towards Collaborators as well as among the Collaborators. We are strongly committed to promote labor equality, preventing and eliminating all types of workplace violence and discrimination whether its based on ethnic or national origin, culture, skin color, physical appearance, sex, gender, gender identity and expression, sexual orientation, age, disability, religion, language, social, economic, health or legal status, pregnancy, marital status, and immigration status, etc

In alignment with the Technical Guidelines for Health Safety in the Work Environment by the Ministry of Health, the Institution does not tolerate discrimination towards Collaborators recovered from COVID-19 or those who have a family member who has or has had it, or any other contagious disease.

## Zero Tolerance for Sexual Harassment and Workplace Violence

In accordance with our commitment to an environment of respect for human dignity and free from violence, the Institution prohibits any type of harassment, and works to prevent sexual harassment and all forms of violence in the workplace.

Report at the Transparency Mailbox and the Report Phone Line 81 81 24 24 09.

**Any discriminatory act, workplace or sexual harassment, or acts of violence will be sanctioned according to the Consequences System.**



**See Manuals:**

- *Identificación, Análisis y Prevención de Riesgos Psicosociales BRGF-RH-108*
- *Reglamento Interior de Trabajo BRGF-GOB-103*





## Live the Value: **Human**

Because we value people and place them at the center of all our actions, we want you to find the necessary balance between family and professional life, while being aware of your responsibility to society, and helping to improve your environment so that Mexico grows in tune with your wellbeing.

For this reason, we've implemented flexible scheduling programs, spaces for integrating our workforce's talents, support for our collaborators during their maternity and paternity leave superior to what the law establishes, promotion of habits to keep your personal finances healthy, as well as ongoing training, integration events, health campaigns and recreational spaces.

Our doors are open to everyone, without distinction of ethnic or national origin, culture, skin color, physical appearance, sex, gender, gender identity and expression, sexual orientation, age, disability, religion, language, social, economic, health or legal status, pregnancy, marital status, and immigration status, etc.



Our most  
importante value  
is you.





## 3 Social Responsibility

**W**e comprehend sustainability as an essential component of our corporate strategy and of the relationship with our stakeholders for whom we aim to generate and give back value.

We have defined three pillars of Social Responsibility, which guide our actions:

### Community

We create close relationships to improve our employees' quality of life and the communities where we have a presence.

### Financial Education

To promote healthy habits of personal and family finances among Collaborators, Clients, and the community.

### Environmental Impact

We take responsibility for the impacts generated by our operations upon the environment, and manage them in accordance with the laws and regulations in force, with the objective of significantly reducing them.



## Environmental Policy

**Regional, is committed to caring and preserving the environment, minimizing the environmental impacts that could derive from its operations, including its banking and financial activity, through the implementation of an Environmental Management System. The Bank undertakes to:**

- Comply with legal and regulatory requirements on environmental protection.
- Establish environmental objectives and goals for eco-efficiency in the use of material resources such as:
  1. Minimization and segregation of waste.
  2. Saving and sustainable use of resources.
  3. Consideration of efficiency and energy saving criteria.
  4. Green purchasing policies.
- Transparently evaluate and communicate the risks and opportunities that the company identifies in relation to pollution control, reducing our carbon footprint and combating climate change.
- Develop effective strategies to reduce environmental impacts.
- Establish mechanisms and internal policies for managing the indirect impacts of financial operations.
- Collaborate with associations dedicated to the protection of the environment to generate community by joining collective actions and achieving greater impact.
- Raise awareness, educating and promoting internal practices with our Collaborators that encourage efficient and responsible use of natural resources.
- Promote continuous improvement of our Environmental Management System.

Regional is a signatory of the Global Compact, which affirms the commitment to implement and promote the principles of this global alliance in a responsible way in favor of the environment. It also adheres to the Principles of Responsible Banking, which establish the role and responsibility of the banking industry in shaping a sustainable future and aligning it with the UN Sustainable Development Goals and the Paris Climate Agreement of 2015.



We seek to contribute to social development in the environments where we operate. For such purpose, we have created an active community where our Collaborators participate through volunteer programs.

We are strengthening our relationship with the communities through a new branch-level approach towards organizations, business, and persons of the environment, in order to:

- 1) Foster local talent and businesses to connect among themselves through the Institution.
- 2) Provide assistance to both Clients and non Clients by organizing workshops and conferences.
- 3) Contribute with local organizations whose efforts are focused on community improvement.



**See Manuals:**

- Política de Evaluación Ambiental, Social y de Gobernanza de Crédito BRGF-PLN-102
- Sistema de Gestión Ambiental BRGF-PLN-103
- Buenas Prácticas BRGF-PLN-104



## 4

## Take care of your Personal Finance

It is your responsibility to fulfill your financial commitments with any Institution as you are our representative; your credit bureau score can positively or negatively affect your personal and professional image, as well as the Institution's image.

Here are some recommendations for maintaining healthy personal finances:

- Start a financial plan according to your possibilities.
- Avoid small-scale, daily expenses or compulsive shopping.
- If you have any credit cards, be aware of your cut-off and payment dates, in order to make total payment when due.
- Have an emergency fund equivalent to 3 months of your salary.
- Make a fortnightly saving culture.
- And most importantly, never spend more than what you earn!

The Institution assists you with short-term personal and auto loans, consumption loans, mortgages, among others. These loans are limited in amount and term, each individual's income level taking into consideration your payment capacity.

Contact the Collaborator Service Branch Office for assistance and to learn more about the benefits available to Collaborators and their families, also take note of the Collaborator's Personal Finance video capsules.

### Collaborator Service Branch Office

sac@banregio.com

Follow the Training and Development programs to maintain and improve your personal finances.

Also, as part of our social responsibility strategy we have a financial education and inclusion platform called Clara Banregio, which brings financial knowledge to people who want to improve their relationship with money. We invite you to learn, share and participate with Clara in their workshops and events.

### Clara Banregio

www.clarabanregio.com



#### See Manuals:

- Beneficios para Colaboradores BRGF-RH-104
- Préstamos para Colaboradores BRGF-RH-107



## Live the Value: **Leader**

We believe you have to the potential to become a leader capable to shine and make others shine! We can create great things if we live our lives with energy and with a purpose that exalts us.

Transform yourself and adapt to a fast changing environment, to do so you must understand customer needs, technology and new regulations. Be an agent of change!

Maintain yourself curious with an active capacity for amazement, be empathic with your team members by helping them develop their potential; only then they will realize they have the power to generate positive changes in their lives and within Banregio's Family.



Take care of  
**Banregio** as  
you take care  
of your family.



## 5 Honesty

**To be honest is to act and perform the duties required under your position and comply with the internal policies of our Institution.**

A Financial Fraud crime is committed when deceiving intentionally or taking advantage of any error involving another Collaborator, Client, Supplier, or of the Institution itself, or take any other action, aiming to receive money or any other personal benefit thereby harming the Institution or a third party.

In general, all frauds are characterized by:

- Lies
- Theft of resources
- Identity Theft
- Data manipulation
- Intentional omission of information
- Treason
- Bribery/Corruption, among others.

Any party carrying out any fraud operates by altering results or data to his/her favor or misuse information to obtain an illicit economic benefit.

No authorization is given for granting pardons to fraud-related crimes in exchange of repairing (by the person held liable) the damages at hand; the Institutional Conduct Committee, the Head of the respective Department or Business Unit, and the departments of Special Affairs and Legal Affairs are the authorized parties to engage in any negotiation, taking into account the evidence at hand.

Financial abuse against older adults refers to the exploitation or manipulation of elderly people in relation to their financial matters. It is a form of abuse or violence towards the elderly, in which their vulnerability and dependence are taken advantage to obtain economic benefits unduly.

It is important to watch for any signs of financial abuse towards older adults and report it to the competent authorities to protect vulnerable people.

The Institution has policies, regulations, and practices for risk management and fraud prevention that are an essential priority of corporate integrity. The Fraud Prevention Policy of its own nature is confidential and internal.



In the event that a Collaborator detects or suspects in good faith with evidence of irregular conduct that may lead to fraud by another Collaborator or Director, it must be reported to the Directorate of Special Affairs and Physical Security and/or through the Transparency Mailbox and the Anonymous Complaint Hotline 81 81 24 24 09, without fear of reprisals.

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## Other Crimes

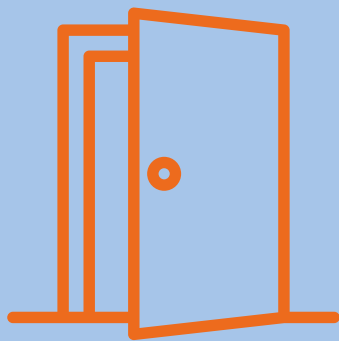
- Theft takes place when something is taken without the owner's consent.
- One of the most common breaches of trust is taking property unlawfully, taking advantage of the victim who allowed the use or possession of such property as a result of a close relationship.
- Scam is based on deceptions, lies and manipulations for the victim to make the transfer of an asset with the aim of getting a profit.

**These acts are punishable by contract termination, full reparation of damages, as well as the applicable legal proceedings until resolution and final consequences.**



### **See Manuals:**

- *Gestión de Consecuencias BRGF-GOB-119*
- *Prevención de Fraudes BRGF-OP-107*
- *Administración de Riesgos BRGF-NR-100*



## Live the Value: **Openness**

We believe that an open dialogue allows people to contribute in generating ideas and proposals to promote innovation and creativity.

We want you to adopt a culture that privileges agility, transparency and innovation as the objective of your work when finding solutions for our internal and external Clients. We know that at the end of the day, they will thank you for it!



We are all part of  
the **Banregio**  
community, and as  
active members we  
must be alert and  
work as a team.





## 6 Anti Corruption

**Corruption is to give or offer anything of value with the intention of influencing another to perform his work responsibilities improperly or to receive preferential or favorable treatment.**

### **Corruption includes:**

- Bribery
- Extortion
- Facilitation payments
- Embezzlement
- Action of a Conflict of Interest
- Undue hiring of public officials
- Collusion
- Trading in influence
- Laundering of proceeds of such practices

Being one of the main problems that affects the country's growth; the Institution does not tolerate any form of bribe/corruption in any of its activities.

Any corrupt or illegal behavior is never acceptable in our operations. Incurring in any act of bribery/corruption within a work environment is not appropriate and will be sanctioned according to the Catalogue of Consequences and, as applicable, the laws in force.

The acts of bribery, fraud, extortion, facilitation payments, influence peddling, and the laundering of the proceeds of these practices, are prohibited in any form, whether you participate in said acts directly or indirectly, and even through third parties.

In line with article 52 and 66 of the General Law of Administrative Responsibilities, as well as the Foreign Corrupt Practices Act (FCPA), the Institution prohibits the payment of bribes in all its forms.

Likewise, no reprisals will be taken in case any Collaborator refuses to give or accept a bribe, even if some business or benefit for the Institution is lost as a result.

The act of extortion or instigation of crime is the requirement of a bribe, whether or not accompanied by a threat if it is refused. Collaborators must oppose any attempt of extortion and report it to the Directorate of Special Affairs and Physical Security and/or the Transparency Mailbox and the Complaint Hotline 81 81 24 09.

Likewise, in our interest of fully complying with the new Anti-Bribery National System and following the best practices of the Financial Action Task Force (FATF) against money laundering, we verify within the transactional monitoring of our Clients and Suppliers that there are no transactions or funds that could have arose from a crime (underlying crime), such as bribery/corruption acts, which lead to Money Laundering activities.

### Case Study 1

Andres works in a Financial Institution and receives a message from his friend Jose, owner of the company Almacenadora 123, S.A de C.V. which offers a considerable monetary amount in exchange for incorporating him as a Supplier to the Financial Institution omitting the verification processes, in order to leave both beneficiaries.

How should Andres deal with this situation?



Andres accepts the offer of his friend Jose and incorporates him into the Institution.



It is not right for a Collaborator to accept this kind of deal in exchange of a benefit.



Andres doesn't accept the offer and denounces the situation through the Transparency Mailbox.



Thank you for doing the right thing!

## Political Contributions

In compliance with article 41 of the General Law of Electoral Institutions and Procedures, the Institution does not make contributions or donations of any kind to political parties or candidates.

We respect the freedom of political participation of our Collaborators as long as it is done on a personal basis, without using the resources of the Institution and outside working hours, avoiding opinions or references on behalf of the Institution.

## Social Contributions and Donations

Social contributions, donations, and sponsorships made by the Institution must be transparent and in accordance with the policies and regulations, ensuring that these contributions are not inappropriate or used as a means or cover-up for corruption or bribery.



**See Manuals:**

- *Servicios de Domiciliación BRGF-SUC-106*
- *Donación y Reciclaje de Activos Tecnológicos BRGF-TI-115*
- *Solicitud de Donación y Reciclaje de Activos de TI BRGF-TI-003*



## Monitoring

The Institution has an Internal Control System which contributes significantly to the achievement of the Institution's objectives, with guidelines of its own and authorized by the Board of Directors.

The following guidelines aim to establish the rules of the Internal Control System:

1. Ensure compliance with all laws and regulations.
2. Promote the efficient employment of human capital and material resources of the business.
3. Identify and evaluate business risks, through the establishment of controls to minimize them.
4. Promote an adequate segregation and delegation of functions and responsibilities, as well as independence between areas.
5. Ensure that there are proper authorization levels to execute and authorize the different business transactions.
6. Ensure that operations are carried out by competent, reliable and ethical personnel.
7. Regulate and monitor any dependence on external Suppliers.
8. Regulate the use and integrity of computing systems, as well as ensuring the confidentiality and availability of the generated information.
9. Establish backup mechanisms and contingency plans.
10. Ensure that the accounting computing system makes the correct and timely recording of all transactions, as well as their results.
11. Ensure that the financial information is prepared in accordance with the regulations that apply.
12. Define actions to prevent and report any unlawful acts or irregularities that third parties or Collaborators may commit.
13. Observe and promote bank and fiduciary secrecy in the handling of the Client information.
14. Ensure that all transactions generate evidence to verify movements, their authorization and their correct and timely processing.
15. Have Audit and verification programs that monitor and evaluate the compliance of the Internal Control System.

## Anti Corruption Training Program

Collaborators and Executives must comply with the anual training through the Code of Conduct, Anti-Money Laundering and Combating the Financing of Terrorism, Internal Control and Information Safety online course, in which integrity, compliance and anti corruption aspects and information are contemplated. Its final purpose is to ratify their commitment to our philosophy and values.

We also have an internal website as a channel of official information to consult key policies and to promote the behavior of all our collaborators, executives, shareholders and counselors. This website is managed by the Institutional Integrity and Regulations Department.

Additionally, in order to contribute to the strengthening of anti corruption issues, the Institutional Integrity and Regulations Department prepares and distributes informative material to Collaborators and Executives through our electronic channels.

**Remember that your actions define you as a person, both inside and outside the Institution.**

**A more honest Mexico is our responsibility and benefits us all.**



**See Manual:**

- Control Interno BRGF-GOB-109



## 7 Conflict of Interests

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It arises when your personal interest in a transaction or obligation conflicts with your responsibilities to the Institution, other Collaborators, Customers or Suppliers.

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A conflict of interest exists when we allow personal interests and relationships to interfere and affect our judgment as collaborator in making decisions, and acting with objectivity, integrity and honesty.

For instance, this can occur when there is a family member with direct dependence (Boss-subordinate) within the same workplace or they are Collaborators in the same area.

It also occurs, when you seek to obtain a financial benefit or avoid a financial loss at a Client's expense, or when you seek to generate a result in order to benefit oneself that is different from the operations contracted by the Client.

This includes using your position for obtaining any benefit or advantage by using confidential information, either for yourself, your family members, friends or a third party.

The conflict of interest policy applies not only to Employees, but also to Executives, Directors, Partners and Shareholders, considering that they have greater access to privileged information.

When facing a real or apparent conflict of interest you must report it immediately to your superior.

Remember that as a Collaborator, it is our responsibility to update the Labor Declaration and Conflict of Interest Letter, when the Institution so requests.

**The interests of the Institution are a priority, as long as they are aligned with the policies and procedures with integrity and honesty.**



**See Manuals:**

- *Manual de Prevención de Conflicto de Interés BRGF-GOB-112*
- *Manual de Reclutamiento y Selección BRGF-RH-100*
- *Carta Declaratoria Laboral y Conflicto de Intereses BRGF-RH-017*

## Gifts and Courtesies

It is our responsibility as Collaborators to comply with the policies regarding the acceptance and giving of gift established in this Code of Conduct and the Personnel Management Manual.

The Collaborators must not accept or award gifts greater than \$3,500.00 M.N. Remember that it is prohibited to receive or give any kind of gift or hospitality to Customers and Suppliers with the intention or apparent intention of influencing actions or decisions.

All gifts exceeding a value of \$3,500.00 M.N. must be reported in writing to the Personnel Management, indicating the date of receipt or award, detail of the gift, name of the Customer and/or Supplier who granted it or, where applicable, to whom it was delivered, as well as the estimated value of the gift.

Any doubt or excesses should be consulted or reported to the Personnel Directorate.

Frequent gifts from the same Customer or Supplier, regardless of their value, are considered inappropriate.

Any activity that goes against these policies will be investigated and those involved will be sanctioned in accordance to the Catalogue of Consequences.



**As Collaborators it is our responsibility to comply with the Policy of Gifts and Attentions established in this Code, in order to avoid real or apparent conflicts of interest.**

### Case Study 2

The Directors of the Financial Institution receive gifts with a note that mentions if they could grant more contracts with the company Almacenadora 123, S.A. de C.V., which provides its services as a Supplier.

### How should Directors act?



The Directors of the Financial Institution accept the gifts and grant the highest number of contracts to the company.



**It is not right for a Collaborator to accept this kind of deal in return of a benefit.**



The Directors return the gifts and report the situation through the Transparency Mailbox.



**Thank you for doing the right thing!**



#### See Manuals:

- Catálogo de Consecuencias BRGF-GOB-016
- Reglamento Interior de Trabajo BRGF-GOB-103
- Código de Conducta para Proveedores BRGF-GOB-114
- Administración de Personal BRGF-RH-106



## Travel and Per Diem Expenses

When undertaking work and/or training trips we must respect and comply with the Travel Expenses policies according to the internal manual of the same name, which includes, the procedures that must be carried out to obtain the economic resources that allow paying for a trip or expenses incurred on behalf of the Institution, as well as the following guidelines:

- Travel Expense advances are strictly for meals, local transportation in the visited area, and tips.
- Travel expenses must be authorized by the immediate manager and/or whoever corresponds.
- The concepts of movie rental, servi-bar, room service or any other service not included in the reservation are not considered Travel Expenses and must be covered by the Collaborator on personal account, since they are not considered as Travel Expenses.
- In the case of business meals, such as attention to Clients or Suppliers, made during the trip, you must present the invoices independently to the settlement of travel expenses, in accordance with the policies of Minor Expenses established in the Catalog of Faculties.
- The collaborator must request the liquidation/reimbursement, as well as report and check the Travel Expenses within a maximum period of 5 business days after the end of the trip.

**For Regional, any invitation to events or recreational activities whose purpose or result is to influence the performance of a Collaborator in their functions inside or outside the company, is unacceptable.**



**See Manuals:**

- *Manual de Gastos de Viaje BRGF-RM-100*
- *Formato Liquidación de Gastos de Viaje BRGF-RM-001*

**Conflicts of interest are a specific form  
of corruption.  
Say NO to the conflicts of interest.**

## 8 Anti Money Laundering

**T**ogether we take care of the Institution's trajectory, by avoiding getting involved in illegal and prohibited transactions and operations, by raising awareness and sharing knowledge with all coworkers.

### Money Laundering

Is the act of concealing, disguising or covering up the origin of the resources and funds that are a product of a crime or illegal activities, to make them seem as if they stemmed from a legitimate source.

### Illegal Activities

Acts that threaten health, family integrity, and safety of people and the country. Being the most common examples, drugs or narcotics smuggling, arms trafficking, corruption, fraud, human trafficking, kidnapping, prostitution, extortion, organized crime, oil theft, copyright infringement, tax evasion, sale of invoices and terrorism financing, among others.

If you have any doubt about the origin or the establishment of a business relationship with an individual or legal entity, you must consult such circumstance with the Anti Money Laundering Department.

**Our commitment is to avoid the entry and use of funds of illegal sources into the financial system. Knowing your Clients and complying with our policies is of vital importance.**

**Remember you are the first line of defense in preventing money laundering.**

**For such purpose, it is essential to:**

- Know your Client.
- Make sure that the captured data matches the information provided by the Client.  
Don't assume, ask and verify.
- Verify and document the origin/source of the Client's funds.
- Know the Client's economic and financial activities.
- Verify the authenticity of the Client's documents.
- Participate in training programs on anti-money laundering.
- Don't ignore any alerts sent by the system.

Report any unusual transaction or indication of irregular activities through the Corporate Intranet, in the Anonymous Report Portal.

## Anonymous Report

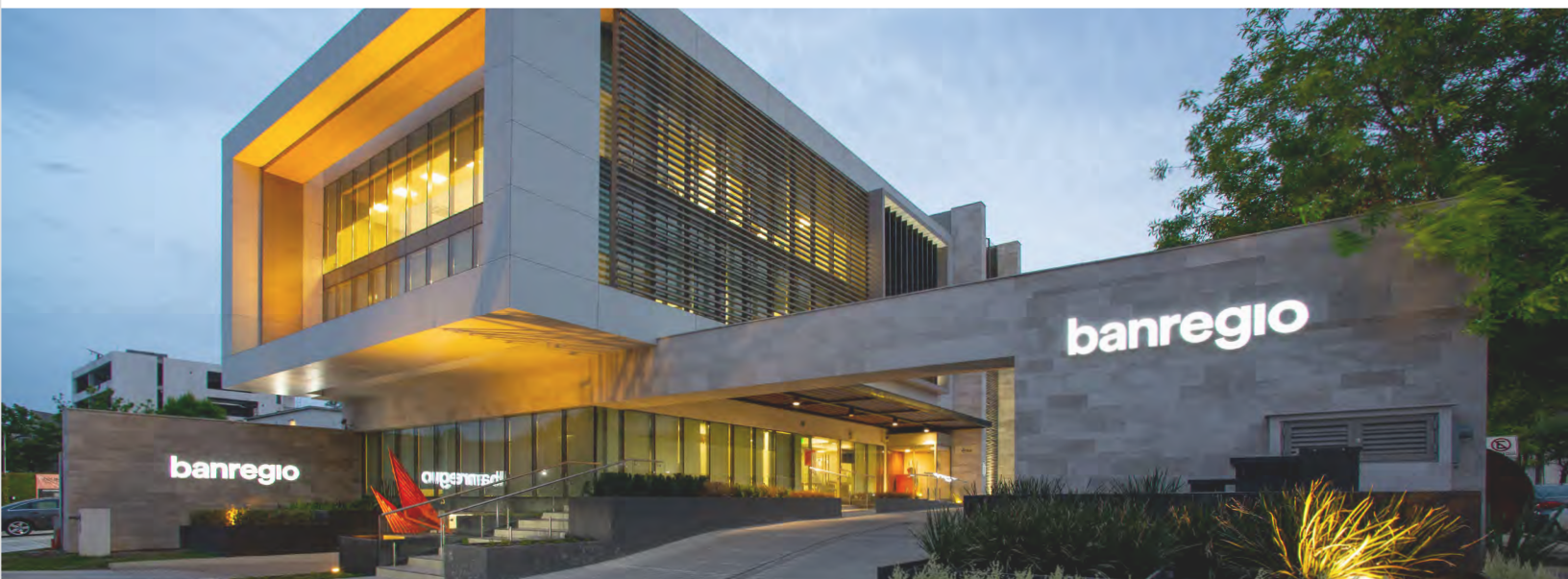
Web Site

<http://simpId.banregio.com:8080/banregiopId/denunciaAnonima.seam>



**See Manuals:**

- *Operación para Prevenir y Detectar Operaciones con Recursos de Procedencia Ilícita BRGF-GOB-106*



## 9 Safety

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**W**e are certain that the proper and adequate use of information is a competitive advantage, therefore, its management and handling must be carried out with responsibility and in a secured and objective manner.

### Using the Information

Information, in any of its forms, is considered -after human capital- the most valuable asset for the Institution.

Each Directorate must classify and handle all information of the Institution according to its importance and value, considering the requirements of confidentiality, availability and integrity of it, in addition to identifying and processing personal data according to existing regulations, as well as regulations emanating from them.

It is the responsibility of all of us who are part of the Institution to make good use of the information we have access to.

#### The information is classified as follows:

- Secret Information
- Internal Use Restricted Information
- Internal Use Information
- Public Use Information

The unauthorized use or disclosure of information constitutes a crime sanctioned by the criminal laws.



**See Manual:**

- Seguridad de la Información BRGF-SGD-105

## Recommendations

- Usernames, passwords, and accesses are unique and non-transferable, do not share them.
- When leaving your workplace, block your computer equipment and safeguard your documents and work tools locked under key.
- At the end of your activities leave your workplace in order, turn off your computer and do not forget to lock all valuable documents or with information of Restricted and Secret Internal Use.
- Protect and make good use of the tangible and intangible assets of the Institution.
- The use of assets or any other resource of the company is prohibited for any purpose that is illegal or contrary to the values of the Institution.
- Third-party applications that are not authorized by the Institution should not be used to carry out a business process and / or share Banregio information.
- Report any digital security incident to the Cybersecurity department: [ciberseguridad@banregio.com](mailto:ciberseguridad@banregio.com)
- Stay informed, take note of the announcements and recommendations published and follow the Information Security and Physical Security training programs.

### Case Study 3

Jorge is a Collaborator of the Financial Institution who decided to go out for lunch but forgot to lock his computer. After a few minutes, he remembered that he didn't lock his computer, and therefore sensitive and confidential information is at risk.

How should Jorge deal with this situation?



Jorge prefers to go for lunch and leave his computer unlocked without considering the security of the information.



The Collaborator didn't act with integrity as he put sensitive and confidential information at risk.



Jorge decides to return to his workplace and block the computer equipment, complying with information security policies.



Doing the right thing benefits us all!

## Brand Usage

When using logos and graphic elements in internal and external documents, you must comply with the corporate identity requirements and obtain prior authorization from the department of Identity or by the Executive Management.

## Use of social media

Social media represents, among other an openness to new spaces of connection, socialization, interaction, exchange, and knowledge.

Thanks to social media, nowadays is easy to share information, therefore, as a Collaborator, you must maintain and take care of the Institution's image.

It is our responsibility to make good use of social media:

- Respect the audience and your coworkers.
- Be prudent, remember that as a Collaborator you are our representative, take care of your image.
- Do not publish any personal opinion or any other reference on behalf of the Institution.
- When publishing information or an opinion as a Collaborator, act with respect and use good judgment and common sense while being careful as to the information you are sharing.
- Do not publish or disclose secret information or internal-use restricted information that compromises your safety, your coworkers and of the Institution.
- If you identify any comment, publication, blog, article, news, photo, suggestion, etc., in any social media that implies an area of improvement, critic, lack of respect, among other things, towards the Institution, please notify the office of Social Media.

**Remember that your actions and decisions have consequences, stay alert and make proper use of social media.**



**See Manuals:**

- *Guía para el Uso de Redes Sociales BRGF-IDE-100*
- *Manual de Identidad Corporativa BRGF-IDE-101*

## Safe Workplace

As Collaborators, one of your responsibilities is to prevent and avoid any risk to your physical integrity, that of your coworkers and Clients, complying with the safety, protection and health guidelines and making correct use of the facilities, access controls and security devices. In the event of a physical security risk, accident, illegal conduct or critical situation, report immediately to the Integral Center for Investigation, Alarm Monitoring (CIIMA).

## CIIMA

81 8124 2434 y 2435  
Emergency Line: 8911

## Healthy workplace

The consumption of harmful substances to health limits the capacity to perform work in a safely manner and puts everyone's safety at risk. Therefore, never perform labor activities under the influence of alcohol, drugs, illegal substances nor use medicines improperly with or without prescription.



**See Manuals:**

- Reglamento Interior de Trabajo BRGF-GOB-103
- Manual de Seguridad y Protección BRGF-SGD-100
- Reglamento de Uso de Instalaciones BRGF-SGD-101







## Live the Value: **Prudent**

We are convinced that our trustworthy image is built by gaining our Clients' and Collaborators' trust, thus distinguishing from our competition; we trust that you will take care of our Institution's culture and value with ethics and transparency, as you represent an important member of the Banregio Family.

Our strength, within a dynamic and competitive environment, has been forged mostly because of our prudence in decision-making.

For such purpose, it is vital that you become well-informed on the responsibilities of your position and execute them on an honest and appropriate manner, according to the institutional policies and requirements.

Remember, we are all compliance!



# 10

## Transparency Mailbox

Do you know or were you involved in any situation of Fraud, Theft, Conflict of Interest, Dishonesty, Corruption, Abuse of Power, Discrimination or Harassment?



Access the:

**Transparency Mailbox**

This is an anonymous, secure and confidential communication channel where you can report any circumstances deemed to impair your values, good practices, or our shared values.

The Transparency Mailbox is a comprehensive tool to provide follow-up and a timely solution to irregularities involving Collaborators, Directors, Partners, Shareholders, Directors, Suppliers and Clients. We value that our Transparency Mailbox respects the anonymity and confidentiality of whistleblowers.

Likewise, it is prohibited to impose any type of punishment or retaliation against people who expose any behavior that contradicts the guidelines of our business.



- Go to the portal Banregio Te Escucha in the Transparency Mailbox section:  
<https://www.banregio.com/buzon-de-transparencia.php>

**Note:** After submitting your report, remember to take note of the folio and password so that you can follow up on the portal.

- Or leave a message on the Report Phone Line:  
**81 81 24 24 09**
- Or through email:  
[buzondetransparencia@banregio.com](mailto:buzondetransparencia@banregio.com)



**Write to us so that **TOGETHER** we can find the best solution.**

#### Case Study 4

Georgina collaborates in a Financial Institution, constantly receives comments and jokes from her colleagues that make her feel uncomfortable, she is afraid to make a report because her colleagues have a good relationship with their leader, which could result in some form of retaliation against her.

**What should Georgina do?**



Georgina avoids the reporting process due to fear of retaliation against her.



**Remember that in the Institution is prohibited any form of retaliation against the complainant!**



Georgina exposes her complaint through the Transparency Mailbox, as any conduct that goes against our values and Code of Conduct is unacceptable.



**Doing the right thing benefits us all!**

## System of Consequences

We encourage you to read the Rules of the Game, which consist in executing your position's duties pursuant to the internal policies and procedures and the regulations in force; otherwise, you will be imposed with a sanction.

## Sanctions

Disciplinary measures vary according to the circumstances and severity of each case, so one or more of the following sanctions may be applied at the discretion of the Officials that make up the Institutional Conduct Committee:

- Verbal warning
- Written warning
- Administrative record
- Facts record
- Leave without salary
- Blocking a promotion of a position
- Salary adjustment or granting of loans
- Justified termination of the employment relationship with the bank



*For more information, please consult the Consequences Management Manual BRGF-GOB-119 and the Catalogue of Consequences BRGF-GOB-016 in the Wiki Normative.*

# Glossary of terms

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**Abuse of Authority:** This takes place when someone takes advantage of the trust given by someone as a result of an existing relationship between them, in order to inflict a harm or a personal prejudice or a prejudice in his/her assets.

**Agent of Change:** Such person who deliberately promotes, or through its behavior, changes in social or cultural matters or in the behavior of individuals.

**Bribery:** It is an offer, delivery or acceptance of any undue benefit, to another person (Public official, Client, Collaborator, Supplier, Partner, etc.), in order to obtain a business or other unfair benefit.

**Collusion:** Agreement between two or more parties to limit free competition in the market.

**Communication:** Any internal or external verbal or written information, including, but not limited to, television, radio, advertising, sales illustrations or reports, and correspondence, as well as answers to questions made by the media, authorities, Clients, parties involved, and by the public in general.

**Conduct:** How a human behaves in his/her life and actions.

**Conflict of Interests:** A conflict of interest takes place when, in a transaction or in an obligation, your personal interest is in conflict with your responsibilities towards the Institution, the Collaborators, the Clients, and the Suppliers.

**Corruption:** To give or to offer an element of value with the intention of influencing another to perform their job responsibilities improperly or receive preferential or favorable treatment.

It includes acts of bribery, fraud, extortion, facilitation payments, the action of a conflict of interest, improper hiring of public officials, collusion, trading influence and the laundering of

the product of these practices.

**Culture:** Set of knowledge that allows someone to develop critical judgement. Customs, practices, ways of being, rituals, types of clothing, and behavior norms are aspects entailing culture.

**Discrimination:** Any distinction, exclusion, restriction or preference that, by action or omission, intentionally or without it, is not objective, rational or proportional and has as its object or result hindering, restricting, preventing, impairing or nullifying recognition, enjoyment or exercise of human rights and freedoms, when based on one or more of the following reasons: ethnic or national origin, skin color, culture, sex, gender, gender identity and expression, sexual orientation, age, disabilities, social status, economic, health or legal, religion, physical appearance, genetic characteristics, immigration status, pregnancy, language, opinions, political identity or affiliation, marital status, family status, family responsibilities, language, criminal records or any other reason. Discrimination will also be understood as homophobia, misogyny, any manifestation of xenophobia, racial segregation, antisemitism, as well as racial discrimination and other related intolerance.

**Diversity:** Refers to a range of human differences or identities of all kinds, such as: gender, gender identity and gender expression, age, religious beliefs, sexual orientation, ethnic origin, physical or mental disability, socioeconomic context and cultural customs, among others.

**Donation:** Monetary or in-kind contribution, resource voluntarily delivered especially for charitable or charitable purposes.

**Embezzlement:** Misappropriation of values or resources by those who are entrusted with the obligation of custody or administration of the same.

**Equity:** Equal opportunities and responsibilities regardless of differences in gender, age, religious beliefs, sexual orientation, gender identity and expression, ethnic origin, socioeconomic context and cultural customs, among others.

**Ethics:** Is a part of the philosophy dealing with good and evil, analyzing the good and evil in humans' conduct. Daily experience of the virtues and values that prevail where one lives.

**Extortion:** It is the demand of a bribe, whether or not accompanied by a threat if it is rejected.

**Facilitation Payments:** Illegal payments to public officials in order to expedite or ensure a routine or necessary governmental process, to which the facilitator payment payer is legally entitled.

**FCPA:** Foreign Corrupt Practices Act.

**Financial Fraud:** Deceit or any other action for purposes of obtaining a benefit, with which someone is prejudiced. Most of the people who carry out a fraud, seek to get personal data to obtain an illicit financial gain.

**Gift:** Gratification, gift or benefit given to a person as a sign of affection or esteem.

**Honesty:** It is the value to say the truth, be trustworthy, demure, reasonable, and just. The conduct of the members of a banking community, as such conduct must be subject to the provisions and internal policies in force of the Institution.

**Inclusion:** Any action aiming to integrate persons inside the community, seeking that such persons contribute their talents, and in turn, receive the benefits that the society may offer. . It refers to respecting, listening and effectively integrating all Collaborators of the Institution, under the

framework of the same rights and obligations established in this Code of Conduct.

**Information:** Communication or acquisition of knowledge that allows extending or specifying such knowledge on a given subject.

**Innovation:** Creation or modification of a product and its introduction to a market.

**Institution:** Regional, S.A.B. de C.V. and its subsidiary Banregio Grupo Financiero, S.A. de C.V., as applicable. To this date, the following are duly authorized:

- Arrenda Regional, S.A. de C.V.
- Banregio Grupo Financiero, S.A. de C.V.
- Banco Regional, S.A., Institución de Banca Múltiple, Banregio Grupo Financiero.
  - Start Banregio, S.A. de C.V., Sociedad Financiera de Objeto Múltiple, E.R. Banregio Grupo Financiero.
  - Sinca Banregio, S.A. de C.V., Fondo de Inversión de Capitales.
    - Regiovalores, S.A. de C.V.
    - Inmobiliaria Vida Regia, S.A. de C.V.
  - Inmobiliaria Banregio, S.A. de C.V.
- Operadora Banregio, S.A. de C.V., Sociedad Operadora de Fondos de Inversión, Banregio Grupo Financiero.
- Servicios Banregio, S.A. de C.V. Banregio Grupo Financiero.
- Comunidad Banregio, S.A. de C.V.
  - Admino, S.A.P.I. de C.V.
  - Comunidad Regional de Pagos, S.A. de C.V.
- Regional Informática y Soporte, S.A. de C.V.
- Hey Controladora, S.A. de C.V.:
  - Hey Administradora de Pagos, S.A. de C.V.
  - Hey Sistemas y Tecnología, S.A. de C.V.
  - Hey Portafolios S.A. de C.V. Sociedad Financiera de Objeto Múltiple Entidad Regulada



Any other new subsidiary or duly authorized financial entity that is integrated will apply automatically.

**Institutional Conduct Committee:** Its objective is to provide security to the Collaborators in the treatment and monitoring of conflicts of integrity and conduct, strengthen the organizational culture based on the values of our Institution and finally expose and decide through discussion forums that arise during their sessions on events identified as non-compliance with the norm.

**Integrity:** The behaviour of a human being of doing what must be done in accordance to what is right.

**Internal-Use Information:** Information required to be known of and used by the Institution's employees and officers for its business activities.

**Internal-Use Restricted Information:** Information that is restricted and subject to limited distribution to the Institution's authorized personnel (inside and outside the Institution) based on their "need-to-know basis" in order to perform their tasks. Its unauthorized disclosure can affect the Institution severely. It also includes such information referred to as Personal Data of Medium and Basic Sensibility Level.

**Law:** Law of Credit Institutions or that which is applicable to it.

**LFPED:** Federal Law for the Prevention and Elimination of Discrimination.

**Money Laundering:** It consists of the act of concealing, disguising, and hiding the source of the resources and funds that are a product of a crime or illegal activities, to make them view as if they stemmed from a lawful source.

**Political Contributions:** Monetary or non-

monetary contributions to support candidates or political parties.

**Privileged Information:** Such knowledge of relevant information or events that have not been disclosed through the authorized official means to make them available to the general public.

This may consist of acts, facts, or events, such as investment plans, financial conditions and business activities of the Institution or of any of its service providers, or of anyone who has the capacity to cause an impact in the prices of securities in the securities market.

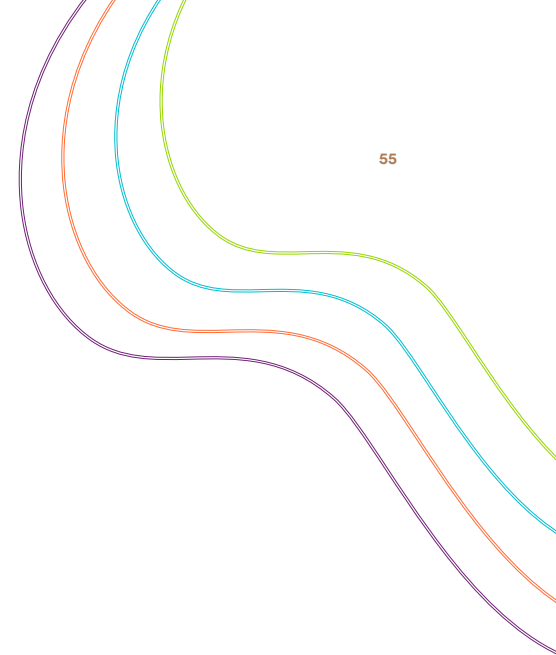
**Public Official:** Person who occupies a legislative, administrative or judicial position at any level of government, local, national or foreign. As well as any candidate, political party, official of a political party.

**Public-Use Information:** Information that through the authorized channels and without affecting the Institution, is deemed appropriate for being disclosed to clients, suppliers, creditors, and financial entities.

**Secret Information:** Information that, upon the opinion of the "Owner", must be subject to continuous surveillance by means of its distribution control. Its unauthorized disclosure would affect the Institution in different aspects, such as in strategic plans, competitive advantages, revenue, damage in image, clients or business partners, among others. It also includes such information referred to as Personal Data of High Sensibility Level, or the combination of Personal Data of Medium and Basic Sensibility Level.

**Service:** To ensure the offering of quality, professional, and responsible treatment to a Client.





**Sexual Harassment:** Situation in which any unwanted verbal, non-verbal or physical behavior of a sexual nature occurs with the purpose or effect of undermining the dignity of a person, in particular when an intimidating, hostile, degrading, humiliating environment is created or offensive. It must be dictated by the department of Special Affairs. It will be treated as a crime and must have the disposition of the victim to file a complaint against the harasser.

**System of Consequences:** This system establishes the policies and procedures for imposing sanctions if any violation, as well as how they must be handle in order to address irregular acts.

**Trading in influence:** Offer or request for an improper benefit to exercise improper influence, through connections with people, and in order to obtain favors or preferential treatment.

**Transformation:** Such action or procedure under which something is modified, altered, or changed, although its identity is maintained.

**Trust:** Hope in someone, thing, or achieve to cause something.

**User:** : A person who contracts or uses a financial service or product derived from any passive or active transaction or service operation.

**Value:** : Is the importance conferred to a given thing or action. It provides a guideline to formulate personal or collective goals and purposes. It reflects our must important interests, sentiments, and convictions.

**Workplace Harassment:** Humiliating treatment, mistreatment to which a person is subjected in the workplace in a systematic manner, which causes psychological and professional problems.

Institutional Code of Conduct  
BRGF-GOB-101-14

The norms mentioned in the Code are enunciative, not limitative.

Consult the Code of Conduct, the Catalogue of Consequences,  
manuals mentioned and formats in the Wiki Normative.

**regional**  
**banregio hey,**