

hey,

banregio

regional

**Code of Conduct
for Supplier**

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About Banregio



One of the pillars

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

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

This is the reason why, with the intention of building more transparent and fair relations, we present this Code of Conduct, which establishes the standards and expectations for our Suppliers.

Purpose

Our Client's Success.

Vision

To be a bank in tune with the community.

Our Values

We invite you to adopt and transmit our values.



Human



Prudent



Relevant



Leader



Open

What does Banregio expect of its Suppliers?

To be upright and honest	To Adopt the Culture	To be an innovator	To be committed
That your actions are aligned with our Code of Conduct with respect, honesty, responsibility, confidence and transparency while you are a Supplier.	Contribute so that together we reinforce the compliance culture and ensure that you carry out the activities according to the corresponding fiscal, legal and regulatory legislation.	Transform yourself, adapting to the ever-changing environment. Offer solutions and value propositions that will help us grow.	To be loyal is to be committed to giving the best of you every day. Our suppliers are a fundamental part of the Banregio Family.

Banregio commits to:

Generate equal opportunities and fair competence in the selection and evaluation of our Suppliers that comply with the required standards.

Maintain clear, transparent and reliable agreements and commitments regarding payment conditions, negotiations and processes.

Maintain an effective communication and offer a constructive feedback regarding the obtained quality and price.

Promote the collaboration, mutual confidence and a win-win relation.

Create an environment of respect and dignified treatment.

Our Suppliers are key for the Institution, they constitute an outstanding source of talent, goods, services and proposals making the operations happen according to our values

We continuously work to make the Institution an excellent place to work.

1

Compliance

Every Supplier is subject to the principles and rules established in current legislation and in accordance with its fiscal, environmental or social commitments and obligations, as well as the application of this Code of Conduct.

The Institution refrains from maintaining commercial relations with those Suppliers (current and future) that incur in illegal practices or outside this Code, policies and regulations.

The Institutional Conduct Committee participates in the preparation, review and annual updating of this document, as well as the promotion of its implementation, dissemination and attachment.

Make sure to know this Code, which is available on the official website of the Institution and participate in the annual training (Webinar format) that the Institution offers to its Suppliers, which is managed by the Comptroller and Compliance Directorate in collaboration with the various areas related to it.



2

Human Rights

In accordance with the fundamental rights established in the Declaration of the International Labor Organization, our commitment is to carry out negotiations with Suppliers that respect the human rights internationally recognized, which consider:

The elimination of all forms of forced labor and slavery.	Eradicate the use of child labor.
Ensure that the working conditions and environment comply with the current labor standards and regulations.	Maintain an environment free from discrimination and harassment as well as a dignified and respectful treatment among your employees.

We are constantly working to eradicate any form of discrimination, promoting inclusion and diversity, that is why our doors are open to everyone, regardless of ethnic or national origin, culture, skin color, physical appearance, sex, gender, gender identity and expression, sexual orientation, age, disability, religion, language, social status, economic status, legal status, as well as health, pregnancy, civil or marital status and immigration status, etc.

Aligned with this commitment, we support gender equity and encourage our Suppliers to identify, prevent and avoid discriminatory acts in their employment or hiring practices.

3 Social Responsibility

We understand sustainability as an essential component of our corporate strategy and the relationship with our stakeholders for which we seek to generate and add value.

We are signatories of the global compact where the commitment to implement and promote the principles of this global alliance of the environment and society is affirmed, to achieve the Sustainable Development Goals of the 2030 Agenda.

Environmental Policy

Under its Environmental Policy, the Institution is committed to caring for and preserving the environment, minimizing environmental impacts that could derive from its operations, including its banking and financial activity, through the implementation of an environmental management system. In this sense, respect for the environment and the minimization of negative environmental impacts on the operations of Suppliers in accordance with the laws and regulations in force, are an essential part of the commitment to the Institution and the community.

Likewise, we seek to contribute to social development in the environments in which we are present, so we take care that the relationship with all our stakeholders are aligned with the social objectives promoted by the Institution. We encourage our Suppliers to build ties with their community and promote issues such as: volunteer actions, well-being of its employees, respect for diversity and inclusion, among others.



4 Honesty

To be honest is to perform the activities and required tasks in accordance with the internal policies of the Institution.

A Financial Fraud is committed when you intentionally deceive or take advantage of some error made by a Collaborator, Client, another Supplier or the Institution, with the intention of receiving money or another benefit in return, thus harming the Institution or a third person.

The crimes of Fraud, Theft, Breach of trust and Embezzlement are punished with the termination of the commercial relation, the repair of the damage in their totality, in addition to the legal proceedings that will be continued until the last consequences.

Not reporting concerns or behaviors that are or may be illegal is also a violation of this Code.

Your voice helps promote our culture of compliance.



5 Anti - Corruption

Corruption is to give or offer any element of value with the intention of influencing another person to perform its labor responsibilities improperly or receive a preferential or favorable treatment.

Being one of the main problems affecting the development of the country, the Institution does not tolerate any form of corruption in any of its activities or those of its Suppliers. Performing acts of corruption within the work environment is not correct and will be punished in accordance with the effective law as well as the termination of the commercial relationship with the Institution.

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

A more honest Mexico is incumbent upon us and benefits us all.

Case Study 1

Jose owns the company Almacенadora 123, S.A. de C.V. and gets a message from his friend Andres, who works in a Financial Institution and needs to obtain resources quickly to make a trip, so he offers him to incorporate him into the Institution as a Supplier omitting verification processes in exchange of a considerable monetary amount, with the purpose of both of them being benefited.

How should Jose act in this situation?



Jose accepts his friend Andres offer and manages to join the Institution as Supplier.



It is not correct for a Supplier to accept this kind of deal in return of a benefit.



Jose doesn't accept the offer, collects the evidence of the conversation and reports through the Transparency Mailbox the situation.



Thank you for doing the right thing!

6

Conflict of Interest

When your personal interests in a transaction or obligation are in conflict with your responsibilities with the Institution, Collaborators, Customers or other Suppliers.

- Do not offer or accept gifts, payments or benefits in exchange for preferential treatment for Collaborators, Customers or other Suppliers.
- Do not provide special treatment or working conditions based on personal or family relationships.
- When you face or detect a conflict of interest, report it immediately to the Transparency Mailbox.

Gifts and Hospitality

Frequent gifts from the same Supplier, regardless of their value, are considered inappropriate. Remember that it is forbidden to receive or give any kind of gift or hospitality with the intention or apparent intention of influencing actions or decisions.

As a Supplier you can only give gifts that do not exceed the value of \$3,500M.N. Therefore, the Collaborator(s) who receive gifts that exceed this value must inform the Personnel Management in accordance with the provisions of the BRGF-GOB-101 Institutional Code of Conduct.

In order to make business relations transparent and in accordance with the established internal policy, Collaborators of the Institution are not allowed to have a contractual relationship as Suppliers in the same.

As a Supplier it is a responsibility to comply with the Gifts and Hospitality Policy established in this Code, in order to avoid real or apparent conflicts of interest.

Case Study 2

Angela is working at the company Almacénadora 123, S.A. de C.V. Her boss tells her that he needs to get as many contracts as a Supplier at the Financial Institution that they provide their services to. He then asks her to send gifts to the Directors in order to obtain that benefit and preferential treatment.

How should Angela act?



Angela performs as requested by her superior and sends the gifts hoping to have a benefit and preferential treatment.



Angela didn't act with integrity, since when performing this action they seek influence actions or decisions.



Angela remembers what she learned in the Code of Conduct for Suppliers and denies carrying out said action since it seeks a benefit and preferential treatment.



Thank you for doing the right thing!

7

Money Laundering Prevention

Our duty is to prevent companies and/or persons that provide products and services with an illicit origin or with illicit funds from entering the Institution. That is why, in accordance with our policies, it is our obligation and responsibility to have a broad knowledge of the Suppliers and validate them against restricted lists.

We also recommend:

- Provide the required documents during the selection and evaluation process.
- Ensure that the information and documents you send are correct and up-to-date to speed up validation and avoid homonymy on restricted lists.
- Keep your information up-to-date on the Suppliers website or contact your Purchasing Manager (Banregio Collaborator).

Website

<https://ehyn.login.us6.oraclecloud.com>

- Know your Customers and how they use the products and services you offer as a Supplier.
- Accredited and document the origin of your funds, if they may be required.

We invite you to share our commitment

to avoid operations with resources of illicit origin and thus together prevent money laundering and financing of terrorism.

8 Security

We are confident that the proper use of information is a competitive advantage; therefore, its administration and management must be responsible, safe and objective.

- The improper use and disclosure of information constitutes a criminal offense.
- Suppliers must respect the principles of confidentiality of the information used during the activities and their relationship with the Institution. Additionally, Suppliers must comply at all times with the Federal Law of Protection of Personal Data in Possession of Individuals (LFPDPPP in its Spanish acronym) and the General Data Protection Regulation (GDPR) for Suppliers handling information with the European Union.
- The Supplier must report any type of security event that could jeopardize the operation and information of our Institution and/or Customers.
- It is the responsibility of any Supplier to know the health and safety standards and make its employees and subcontractors comply with them when the activities are carried out inside the facilities of the Institution, thus fostering a safe and prudent environment.
- Suppliers shall also use the resources that the Institution makes available to them in a responsible manner and only use them for authorized purposes.

Drug-free workplace

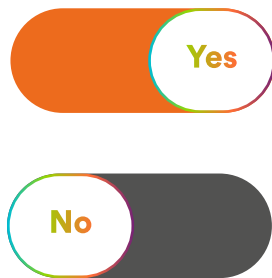
Substance use limits the ability to get the job done safely and puts everyone's safety at risk.

For this reason, we should never engage in work activities under the influence of alcohol, drugs or illegal substances or misuse prescription or over-the-counter medicines.

9 Transparency Mailbox

Remember that our decisions always have an impact, positive, negative, big or small.

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



Go to:

Transparency Mailbox

It is an anonymous, secure and confidential communication channel through which you can share with us any situation that you consider affects your integrity, good practices or our values.

The Transparency Mailbox is an integral tool to follow up and timely solve irregularities involving Collaborators, Managers, Partners, Shareholders, Directors, Suppliers, Customers and Users. We value that our Transparency Mailbox respects anonymity and confidentiality of whistleblowers.

- 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 by email:

buzondetransparencia@banregio.com





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

Suppliers who perceive inappropriate behavior of any Collaborator of the Institution, must report it, without affecting the business relationship. The Institution strictly prohibits intimidation or retaliation against anyone who reports any out of policies with our business.

Consequence System

It is essential to carry out the activities and tasks required by the Institution in accordance with the policies, procedures, current regulations and the executed contract or agreement for the provision of services, otherwise we will act accordingly as a result of the non-compliance by the Supplier. These consequences include the termination of the commercial relationship and the legal or administrative actions that may apply.

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I, the Supplier

Agree to know, respect and comply with what is described in this Code of Conduct, as well as to abide by the internal rules and policies of the Institution and the provisions of the executed contract or agreement for the provision of services.

I agree to be an example to my family, my work and my community by behaving honestly and being responsible for the decisions I make on a daily basis.

In addition, I make sure to participate in the training that the Institution offers and share this Code with key employees from my organization who are involved in the process.

To register the signature of your commitment, go to:

<https://goo.gl/forms/NnL8fB9bwaSHO8GS2>



Glossary of terms

Communication: Any internal or external information, verbal or written, including but not limited to television, radio, advertising, sales illustrations or reports and correspondence, as well as answers to questions from the media, authorities, Customers, related persons and the general public.

Conduct: How human beings behave in their lives and actions.

Confidence: Hope in a person, thing or event.

Conflict of Interests: When your personal interests in a transaction or obligation are in conflict with your responsibilities with the Institution, Collaborators, Customers or other Suppliers.

Culture: A set of knowledge that allows someone to develop his/her critical judgment. Customs, practices, personality, rituals, types of clothing and standards of behavior are aspects included in culture.

Fraud: Deception with the intention of making a profit, resulting in someone being harmed.

GDPR: General Data Protection Regulation.

Honesty: It's the courage to tell the truth, to be decent, modest, reasonable, and fair. This is how actions of the members of the banking community must be, they must adhere to the current provisions and internal policies of the Institution.

Inclusion: Is any attitude, policy or trend that seeks to integrate people into society, so that they contribute with their talents. At the same time, these persons are reciprocated with the benefits that society can offer.

Information: Communication or acquisition of knowledge that allows to expand or define the

knowledge possessed on a given subject.

Institution: Regional, S.A.B. de C.V. and its subsidiaries. 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.
 - Hey Banco, S.A, Institución de Banca Múltiple, Banregio Grupo Financiero.
- Comunidad Banregio, S.A. 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.:
 - Admino, S.A.P.I. de C.V.
 - Hey Tech, S.A. de C.V.
 - Hey X, S.A. de C.V.
 - Hey Medios, S.A. de C.V.
 - Hey Portafolios S.A. de C.V. Sociedad Financiera de Objeto Múltiple Entidad Regulada

Any other duly authorized new subsidiary or financial organization that is integrated will be included automatically.

Integrity: Behavior of the human being that focuses on doing what must be done in accordance with what is correct.

Internal Policy: Internal norms and rules aligned with the institutional values to which the Institution's Collaborators and Faculties must adhere in order to properly perform their functions.

Internal Use Information: Information that requires to be known and used only by the employees and officers of the Institution for the performance of their business activities.

Internal Use Restricted Information: Restricted information subject to limited distribution to authorized personnel inside and outside the Institution on "need to know" basis for the performance of their tasks. Its non-authorized disclosure could seriously affect the Institution. It also includes the information regarding Personal Data of Medium and Basic Sensitivity Level.

Law: Credit Institutions Law or those applicable.

LFPDPPP: Federal Law on Protection of Personal Data Held by Individuals.

Public Use Information: Information that through authorized channels, and without affecting the Institution, is considered appropriate to disclose to clients, suppliers, creditors, financial organizations.

Purchasing Manager: Role of the Manager / Deputy Manager / Coordinator / Analyst or person in charge of the specialized areas of the Institution according to the provisions of the Catalog of Faculties BRGF-GOB-102, who is empowered to prepare a purchase order (acquisition of product and/or service) through the Oracle system.

Secret Information: Information that, in the opinion

of the "Owner", should be subject to continuous supervision by controlling its distribution. Its unauthorized disclosure would affect the Institution in various aspects such as strategic plans, competitive advantages, income, brand image, affectation to its clients or business partners, among others. It also includes information that refers to High Sensitivity Level Personal Data, or the combination of Medium and Basic Sensitivity Level Personal Data.

Service: Ensure the fulfillment of an agreement to the Supplier or Client with quality, professionalism and responsibility.

Supplier: Juridical or natural person who supplies necessary services, products, resources or supplies for the development and operation of the Institution.

System of Consequences: It establishes the policies and procedures for the application of sanctions in case of noncompliance, as well as the way that they should be applied in order to handle irregular acts.

User: Person that hires or uses a financial service or product derived from any passive, active or service operation.

Value: The importance attributed to a specific thing or action. It provides a guideline to establish personal or collective goals and purposes. They reflect our most important interests, feelings and convictions.

Code of Conduct for Supplier
BRGF-GOB-114-8

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

For more information, consult the Institutional Code of Conduct
on our website: www.banregio.com/conoce-mas/integridad-corporativa.php

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