



# **Code of Ethics and Conduct**

**Banco General, S.A. and Subsidiaries**

**APRIL 2023**

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**In matters of ethics,  
things are either black or  
white; beware of the grey.**

Federico Humbert Azcárraga





# Objetives

The Code of Ethics and Conduct is a document that includes the principles and values that constitute the pillars of the corporate culture of Banco General, S.A. and Subsidiaries and the behaviors expected of directors, executives and employees, in the performance of their tasks and responsibilities, inside and outside of the organization.

The objectives of the Code of Ethics and Conduct are:



Preserve our reputation and strengthen an exemplary corporate image through the development of our business and activities, within the current legal framework, with full observance of ethical principles.



Serve as guidance to all directors, executives and employees of Banco General, S.A. and Subsidiaries regarding the attitudes and conduct applicable inside and outside the organization.



Facilitate the process of integration and adaptation to Banco General, S.A. and Subsidiaries' own culture.



Explain the scope of the commitments assumed in the manifesto Code of Ethics and Conduct of Banco General, S.A. and Subsidiaries.



# Who we are





## Our Values and Culture

The Vision, Mission and Values of Banco General, S.A. and its Subsidiaries constitute the core of its organizational culture, since they provide a common sense of direction to all employees, executives and directors, and must be evidenced daily with each of their actions within and outside of the organization.

### Our Vision

is what makes us enduring over time as an institution and raises the aspirations of Banco General:

**" Leading company, recognized for its solidity, ethics, innovation, dedication to the customer, sustainability practices and solidarity with the community ".**

### Our Mission

summarizes our objectives, constituting the expression of what Banco General S.A. and Subsidiaries, look for in their work:



**Serve our customer with excellence and satisfy all their financial needs**



**Comply with our ethical commitment**



**With enthusiasm and dedication, work as a team and promote new ideas**



**Maximize return of investment**



## Our Values

Our Vision and Mission are based on the following values:

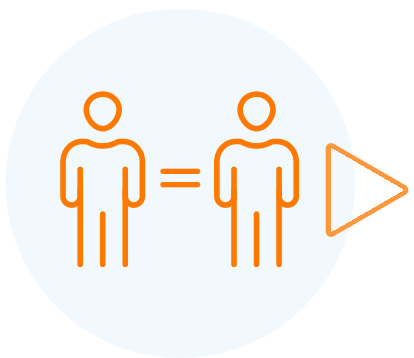


### Integrity

Act consistently and on a daily basis on the principles of transparency, justice, reliability and respect.

### Confidentiality

Not disclose any information to a third party without expressed previous authorization; It refers to the discretion and reservation that must be kept regarding a specific event detected during a process. The information handled at Banco General, S.A. and Subsidiaries can only be known by authorized individuals.

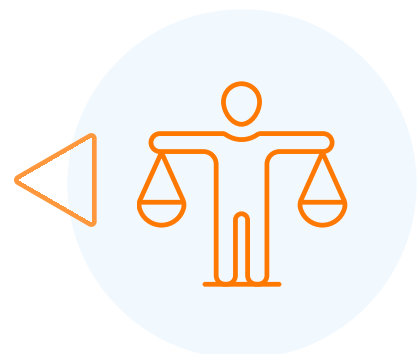


### Honesty

Harmonize the words with the actions; it means to have identity and coherence and to be proud of oneself.

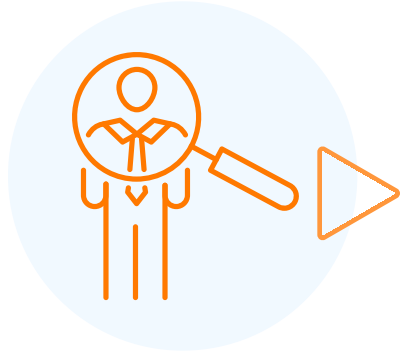
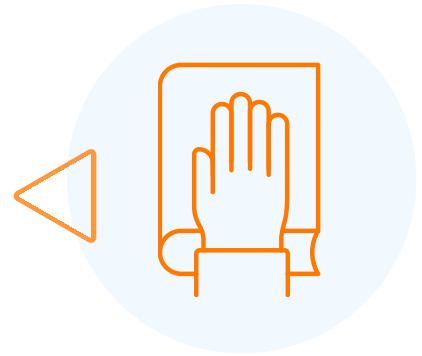
### Respect

Take care of the interests, rights, spaces and times of others, and that each one owns individually. It is taking care of the things that one shares with another that are not one's own.



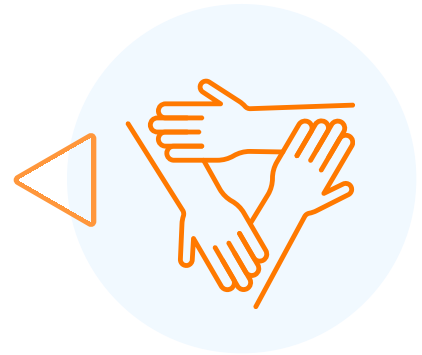
## Moral Solvency

Act with decency, decorum, respect and dignity; to not take advantage of the trust, innocence and naivety of others.



## Transparency

Provide information in an honest, clear, accurate and timely manner.



## Solidarity

Participate and contribute to the development of the communities in which we operate, as well as in areas of high social risk.

All directors, executive personnel, and employees of Grupo Financiero BG, Banco General, S.A. and its subsidiaries, must keep a strong commitment in the fight against corruption in any of its forms, as well as know and ensure the strict compliance of our Anti-Corruption and Anti-Bribery Policy.

All directors, executive personnel and employees of Banco General, S.A. and Subsidiaries must respect and obey the laws, as well as local and international regulations in all the countries in which we operate. It is the responsibility of each individual to know and understand the policies of Banco General, S.A. and Subsidiaries, the country's legislation and regulations applicable to their job responsibilities.





## Corporate Governance

Banco General, S.A. and Subsidiaries recognizes with absolute and full responsibility, the importance of honest, committed and effective compliance with honest, committed and effective control systems; therefore, it reinforces the values and principles as a good corporate citizen. It is the responsibility of the Board of Directors, with Senior Management, to promote ethical and integrity standards, as well as the continuous management of an organizational culture that emphasizes the importance of the processes of internal control.

For this, the Board of Directors and the Senior Management have developed an internal system that establishes rules and guidelines that must govern its performance, in such a way that transparency, objectivity and clarity in the allocation and administration of resources are guaranteed, which is based in the Corporate Governance system.

We define Corporate Governance as the system by which a company makes and implements decisions to achieve its objectives framed in the culture defined by the Board of Directors; in other words, it is the system by which the company is directed and controlled. It can include formal mechanisms based on defined structures and processes, as well as informal mechanisms that arise in connection with the culture and values of the company, often under the influence of those who lead the organization.

Banco General, S.A. and Subsidiaries has a [Corporate Governance Manual](#) that details the policies, roles and procedures of its internal control system.





## Our Code of Ethics and Conduct **a living document**



### **Applicability**

This Code of Ethics and Conduct applies to Banco General, S.A. and its Subsidiaries, made up of: Finanzas Generales, S. A. and Subsidiaries (BG Trust, Inc. and Vale General, S.A.), General de Seguros, S.A., Overseas Capital Markets, Inc. and Subsidiaries, (Banco General Overseas, Inc. and Commercial Re Overseas, Ltd.), BG Valores, S.A., BG Investment Co. Inc. and Subsidiaries, Banco General (Costa Rica), S.A., ProFuturo, Administradora de Fondos de Pensiones y Cesantías, S.A. and Yappy S.A.







## Compliance

The effective application of the corporate values described in this Code depends on the professionalism, awareness, and good judgment of all of those who make up Banco General, S.A. and Subsidiaries, and is a shared responsibility.

However, due to the breadth of the topic, this Code cannot foresee all the topics that may arise in the future. If presented, these would be considered in due course.

It should be noted that this document is not exclusive of existing codes or specific regulations that are required by external regulatory entities, and/or where the nature of their management requires.

This Code is presented to each and every one of the directors, executives and employees of Banco General, S.A. and Subsidiaries, and the acknowledgment of its obligation to comply, will be recorded.

In addition to keep the vigilant attitude that is expected, employees who occupy positions of authority must set an example regarding compliance with the principles and standards set in this Code.



## Complaints process and follow-up

Any director, executive or employee who is aware of activities related to the disclosure of confidential information, fraud, theft of money or titles in general, or the violation of any of the principles established in this Code, has the obligation to immediately report them to any of these instances:

- i. Executive Vice President of Human Capital and Corporate Services
- ii. Your Human Capital Advisor
- iii. Secure Line





## **Confidentiality and Non-Retaliation Policy**

Complaints for breach of the Code of Ethics and Conduct will be handled in confidentiality, only including those involved in the investigation.

Banco General, S.A. and Subsidiaries, will not tolerate retaliation against any employee, former employee or third party for denouncing or reporting any breach of this Code and will keep the confidentiality of the complaints. The open communication of situations and concerns by employees, without fear of negative consequences, is vital for the proper implementation of this Code.

It is a commitment for the employees of Banco General, S.A. and Subsidiaries to cooperate with the internal investigations on ethics issues. Information submitted, related to reported cases, will receive a timely, professional, and confidential response.



## **Sanctions**

In general, non-compliance with the principles and rules established in this Code of Ethics and conduct will be sanctioned disciplinary or legally, according to the seriousness of the infraction and in accordance with the internal policies of the organization, as established in the Code of Labor and Banking Legislation, without prejudice to civil or criminal actions contemplated in the Law.



## **Regulations and modifications**

New regulations or modifications to this Code will be proposed by the Committee of Social Responsibility and Business Ethics and approved by the Board of Directors.



# Our responsibilities





## Our responsibility Board of Directors

The directors of the Board of Directors of Banco General, S.A. and Subsidiaries must act in a diligent, responsible, objective, and reasoned manner when making decisions. All the responsibilities of the directors are detailed in [Banco General, S.A. and Subsidiaries Corporate Governance Manual](#).





## Our responsibility Executive Personnel

The executive staff of Banco General, S.A. and Subsidiaries that includes the positions of Executive Vice President, Vice President, Assistant Vice President, Executive Manager and Manager, must act in good faith, with loyalty and diligence of a good professional. Their actions will be carried out for the benefit of the organization, taking into account the interested parties.

In fulfilling their function, the executive staff shall:

- ✓ Make the necessary efforts to achieve the adequate development for which Banco General, S.A. and Subsidiaries is legally constituted, as well as the strategic objectives, the business plan and the social objective of the organization.
- ✓ Ensure strict compliance with legal and statutory dispositions.
- ✓ Ensure strict compliance with our Code of Ethics and Conduct, and promote knowledge and understanding of it among their teams.
- ✓ Ensure the preservation of the corporate culture of Banco General, S.A. and Subsidiaries.
- ✓ Save and protect information about the businesses of Banco General, S.A. and Subsidiaries and the relationship with customers.
- ✓ Avoid any situation that could turn into a conflict of interest, such as, any situation in which the judgment of the individual (concerning his primary interest) and the integrity of an action, tend to be unduly influenced by a secondary interest of a generally economic type. The individual is expected to resolve the situation ethically and in accordance with the provisions of this Code.
- ✓ Refrain from misusing confidential information.
- ✓ Be responsible for the integrity of the information and documents in their custody.
- ✓ Refrain from participating alone or through another person for their own benefit or that of third parties, in activities that imply competition with Banco General, S.A. and Subsidiaries or in acts with respect to which there is a conflict of interest.
- ✓ Act courteously, with availability and attention to all the people with whom one interacts, respecting individual differences.
- ✓ Act in professional life, with loyalty towards colleagues and employees under one's charge.
- ✓ Recognize the merits and opportunities for improvement, in relation to the work carried out by colleagues or employees and express it as soon as the opportunity arises.
- ✓ Promote absolute respect for the opinions of others and the prohibition of all types of harassment and discrimination.
- ✓ Adequately execute their functions within the faculties and privileges assigned.



## Our responsibility Employees

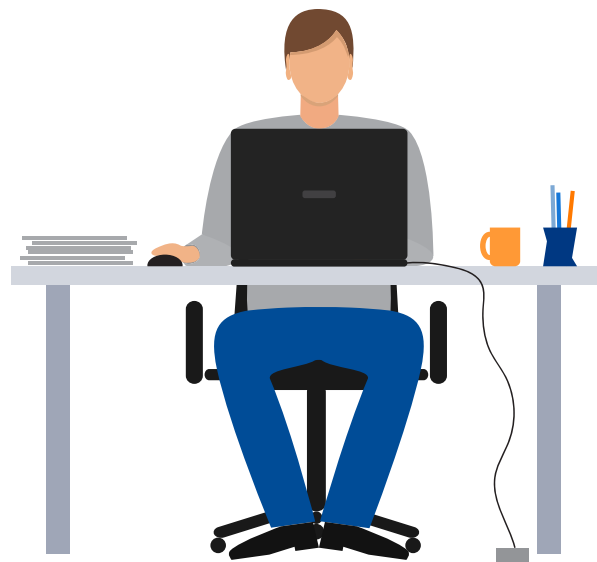
Employees must always act in accordance with the values of Banco General, S.A. and Subsidiaries and ensure strict compliance with this Code of Conduct and Ethics.

In the performance of their duties, they must:

- ✓ Understand and comply with the laws and regulations that govern Banco General and Subsidiaries, as well as internal policies and procedures.
- ✓ Act in his/her professional life in a fair, transparent and honest manner, with loyalty towards colleagues and the organization.
- ✓ Immediately report any unacceptable conduct or violations of laws, regulations or internal policies.
- ✓ Clearly inform customers of the terms and conditions of the products and services offered and contracted.
- ✓ Make sure that customers have satisfactorily received any required information. The information provided or the reason that justifies the refusal to provide it, will be presented in a clear and understandable manner.
- ✓ Be responsible for the integrity of the information and documents in their custody. The information, data, records and operations carried out with clients must be exact and precise, in such a way that they reflect with transparency the business carried out with Banco General and Subsidiaries.
- ✓ Participate responsibly and with good judgment in social, professional and political dialogues on [social media](#).
- ✓ Preserve the organization's assets, that is, equipment, materials, technological and strategic information, and operational facilities.
- ✓ Use the media and communication technologies for matters pertinent to work, taking into account information security and preventing the spreading of illegal, pornographic, racist, or political or religious messages.
- ✓ Obey and comply with the mandatory health regulations and general biosafety recommendations decreed by the country's health authority in the event of an epidemic or pandemic.



**Our  
commitment to...**





## Our commitment to Employees

Banco General and Subsidiaries promotes work relationships that stimulate collaboration and teamwork and the necessary efforts to successfully overcome the challenges that arise.

The hiring of employees is carried out based on equal opportunities, free of all kinds of biases and is framed in rigorous standards of academic, professional and moral quality.

Banco General and Subsidiaries promotes a pleasant and productive work environment that channels the potential and creativity of its employees; in addition, it encourages teamwork and ethical and moral values. In this same direction, it is committed to:

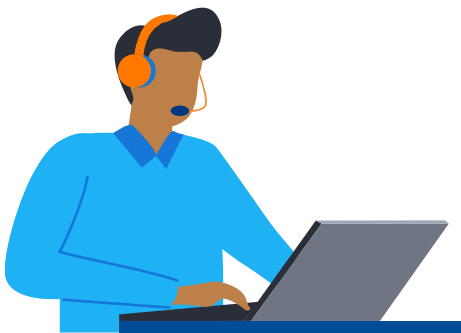
- ✓ Not tolerate any type of discrimination, including preconceptions of origin, race, sex, age, religion, gender bias, sexual orientation, family models, political affiliation, disability, disease or any other form of discrimination.
- ✓ Not tolerate child labor within its operations or in any part of its value chain.
- ✓ Not tolerate the practice of sexual harassment (see [Sexual Harassment](#)).
- ✓ Not tolerate behavior of any kind, including improper or illegal, that could give rise to a reputational risk for the organization (see [Harassment](#)).
- ✓ Not tolerate any type of intimidation, threats, harassment, workplace bullying of any kind between employees of the organization.
- ✓ Establish continuous training programs to maintain excellence and professional development of employees.
- ✓ Ensure that hiring, promotion, project participation, career development and/or compensation decisions are based on standardized criteria free of gender bias and any type of discrimination.
- ✓ Provide its employees with competitive compensation and benefits, grant recognition, promote open communication and adequate channels for feedback in compliance with labor laws and regulations.
- ✓ Provide employees with a pleasant work environment and adequate physical facilities; protect the occupational health of the worker and the environment, as well as seek the balance of family, work and personal life with social co-responsibility.





## Our commitment to Employees

- ✓ Ensure the fulfillment of proposed goals, through the practice of values and compliance with this Code of Ethics.
- ✓ Promote family values as the basis of society; for this reason, relationships between employees that risk or violate this principle will not be accepted or approved by the organization.
- ✓ Support feedback processes, provided they are carried out through the appropriate channels, as a demonstration of loyalty to the organization and to the rest of the employees.
- ✓ Communicate to employees, in a timely manner, the results of the evaluation of their performance.
- ✓ Guarantee that the personal, medical or benefit information of the employment relationship with the employee is guarded by the organization and managed by appropriate personnel. Likewise, guarantee free access to it by the employee with due confidentiality.
- ✓ Promote the voluntary participation of employees in activities or events that contribute to the development of the community.





## Our commitment to Clients

Banco General, S.A. and Subsidiaries understands that the relationship with its clients is based on trust. For this reason, it commits to:

- ✓ Offer clients comprehensive financial services, based on the construction of long-term relationships of trust, which maximize the generation of value.
- ✓ Know the client according to current laws and internal regulations.
- ✓ Serve the client with excellence, satisfying all their financial needs.
- ✓ Treat our clients fairly, respecting their human dignity and culture at all times.
- ✓ Strictly apply the rules established for the granting of credits and all kinds of financial operations.
- ✓ Make sure that customers have satisfactorily received the required information. The information provided or the reason that justifies the refusal to provide it, will be presented in a clear and understandable manner.
- ✓ Keep a rigorous policy of total rejection, and self-protection against actions linked to money laundering, terrorism financing or similar practices. Seek at all costs compliance with current legal standards as well as internal regulations, rules and procedures.
- ✓ Promote the availability, terms, quality of the products, facilities and services offered, with sales arguments that conform to the truth and therefore do not misrepresent the facts or lead to error, deception or confusion.
- ✓ Respond to customer requests, claims and requirements in a timely and accurate manner, in accordance with the law and the respective contracts.
- ✓ Make sure that all the necessary policies are kept in force and monitor the effectiveness of the related processes that allow compliance with the Laws, their reforms, and regulations related to money laundering, financing of terrorism, and financing of the proliferation of weapons of mass destruction, in all the countries that we operate.



## Our commitment to Suppliers

Our activity obliges us to keep mutually beneficial relationships with suppliers, high quality standards, compliance and transparency. Based on this:

- ✓ We expect the practice of ethical principles.
- ✓ We carry out contracting and purchasing processes in a transparent manner. These processes are governed by principles of good faith, economy, responsibility and quality in accordance with the established control and prevention measures.
- ✓ We select our suppliers fairly, taking into account the competitive price, quality, experience, service and reciprocity with the Bank.
- ✓ We foster long-term relationships, based on fair, transparent and equitable negotiations.
- ✓ The suppliers contracted by Banco General, S.A. and Subsidiaries must comply with current laws.
- ✓ We promote sustainable development throughout the supply chain.
- ✓ We respect intellectual and industrial property rights, so business relationships cannot be established with suppliers that do not demonstrate that they are duly authorized to use or market products or services.



## Our commitment to **Public Authorities**

We recognize the role of the State as responsible for the generation of stable scenarios in the economic, political and social spheres; for this reason, we are committed to developing our business within current legislation, and to respect the laws, regulations and established principles.

Relations with public authorities and regulatory entities will always be managed within the framework of the law, under ethical standards, with transparency and without bribery or undue influence.

We will present truthful financial information to the corresponding regulators, in the time required by banking regulations in each country where Banco General, S.A. and Subsidiaries has a presence.

Relations with State entities or agencies will be handled through employees authorized by the Senior Management. They must be guided by a spirit of cooperation, cordiality and respect; without prejudice to maintaining confidentiality in cases where it is manifestly necessary.

Relations with representatives of state institutions and authorities must always reflect the official position of Banco General, S.A. and Subsidiaries, through authorized employees.

Employees must previously inform their immediate boss when they have been called to testify as a witness or provide other types of evidence in legal proceedings related to Banco General, S.A. and Subsidiaries.



## Our commitment with the **Community**

Banco General, S.A. and Subsidiaries is committed to its community and to the integral development of the country, without this implying the creation of dependencies. Based on this:

- ✓ We support the development of social initiatives, addressing priority areas such as food security, education, health, inclusion, and decent housing.
- ✓ Our strategy in the social area leads us to establish lasting relationships with non-profit organizations. Donations and support provided must be made through the channels defined for this purpose.
- ✓ We support all those actions that promote the rational use of the natural resources at our disposal, promoting at all times the conservation of the environment.
- ✓ We support and promote educational and awareness initiatives inside and outside the company to promote environmental conservation.
- ✓ We promote responsible financing to favor the environment, evaluating possible environmental risks in credit proposals.
- ✓ We conduct our operations in accordance with the spirit and intent of the United Nations Universal Declaration of Human Rights.



# Our policies



# I

## Confidential information

At Banco General, S.A. and Subsidiaries we believe that obtaining and proper use of information is an essential requirement, so its administration and management must be done in a confidential, responsible, secure and objective manner.



### A good practice

- Take care of the information you manage as a good father of a family.
- Lock your work equipment when you are not using it.
- Avoid opening suspicious emails or messages.
- Use only authorized digital programs and tools.
- Keep up to date with all the security recommendations given by the Bank.

All information related to Banco General, S.A. and Subsidiaries, its customers and suppliers is considered confidential. This includes information related to employees, business plans, methodologies, technological systems, market strategies that are not public or whose unauthorized disclosure may harm the development of the financial activities of Banco General, S.A. and Subsidiaries, customers or suppliers. This information must not be disclosed in writing, by telephone, orally or digitally.

We understand by obtaining confidential information, to know about acts, facts or documents that for no reason should come to public knowledge, or that may represent a personal benefit to whoever makes improper use of them.





### A good practice

Discussing sensitive information in open areas, public spaces, on loudspeakers or on the internet, could expose confidential information. Use headphones or avoid handling this type of information in the aforementioned spaces.



All employees will be responsible for the integrity of the information and documents in their custody. The information, data, records and operations carried out with clients must be exact and precise, in such a way that they transparently reflect the business carried out.

Employees, executives and directors must commit to safeguard and make good use of all confidential information they possess, even after separating from Banco General, S.A. and Subsidiaries.

Executive staff and directors must take the necessary measures to ensure compliance with the provisions of the rules and policies related to the management or security of information, and the [Corporate Governance Manual](#).

When confidential information is required by a competent authority, the request must be dealt with immediately, after verification of the requirements demanded by the corresponding area.

Employees, executives and directors will respect the intellectual and industrial property rights of other companies and their employees are required to respect such rights.





## Relations and political activities

Banco General, S.A. and Subsidiaries respect the participation rights of directors and employees in political activities or contributions of a personal nature, as long as they do not interfere with the duties and responsibilities contracted with the organization. Employees may not use Banco General, S.A. and Subsidiaries facilities, their resources, logos, uniforms or any other symbol that may be associated with the organization for these activities. If the employee were to hold a government position, Banco General, S.A. will analyze each case and act in accordance with the provisions of the competent laws.

Banco General, S.A. and Subsidiaries will not make contributions of any kind to political parties or to candidates for public positions in local, national or international governments, including financial or in-kind resources.



## General conflict of interest

The executive and management staff and other employees of Banco General, S.A. and Subsidiaries have the obligation to act honestly and ethically, always seeking to protect the interests of the organization.

There is a situation of conflict of interest when a director or employee is deliberating on a decision for the company or is in a position to influence or participate in the respective decision and making this decision may impact, positively or negatively, other direct interests or indirect employees outside the company, including people related up to the third degree of consanguinity or affinity (see [Table of Consanguinity and Affinity](#)).

Therefore, situations that mean or could mean a conflict of personal interest between the executive staff, employees, directors and Banco General, S.A. and Subsidiaries, are not allowed, such as:

✓ Any situation in which employees, executives or directors have private or personal interests capable of influencing the impartiality and objectivity of the performance of their duties, or that may affect the interests or reputation of Banco General, S.A. and Subsidiaries.

✓ The approval of special conditions for banking relationships that employees maintain with Banco General, S.A. and Subsidiaries. The benefits and incentives that the organization offers to its employees or directors are excepted.

✓ The participation of an employee, executive or director in the direct management of the banking relationship or in credit decisions or other decisions that may economically or morally affect a client of Banco General, S.A. and Subsidiaries that is a competitor in a business where the employee or their relatives, up to a third degree of consanguinity and affinity, maintain economic interests.





## General conflict of interest

### What happens if...

**I'm dealing with a business client and I find out that my father-in-law has an equity interest of more than 20% in that company...**

In this case, you must immediately report the conflict of interest to your direct boss - since your father-in-law is in your second degree of affinity - and evaluate the option of passing this client on to another colleague.

- ✓ In the event of a conflict of interest of a professional or personal nature in relations between employees, employees are expected to resolve the situation ethically, in accordance with what is indicated in this Code, to avoid biased decisions.
- ✓ No employee may work at Banco General, S.A. and Subsidiaries and, in turn, provide services to other financial and related institutions, customers or suppliers of Banco General, S.A. and Subsidiaries. Teaching activities and those duly approved by Senior Management are excepted.
- ✓ Employees must avoid participating in external activities that, although in themselves may not represent a conflict of interest, could adversely affect job performance by requiring too much time, to the detriment of full compliance with the duties inherent to the position they hold within the group.
- ✓ No employee of Banco General, S.A. and Subsidiaries must give or receive special treatment with respect to employment conditions, based on family, sentimental or personal relationships that link them to persons endowed with internal or external authority.
- ✓ Employees are free to buy and sell shares, bonds and make other investments, as long as they strictly comply with the relevant laws, regulations, policies and procedures. They must refrain from using or taking advantage of information available by reason of their position, to satisfy particular or personal interests.

## Conflict of interest in the management of client relationships



**No employee, executive or director may authorize, approve, manage or directly supervise relationships or transactions with customers and suppliers, up to the third degree of consanguinity and affinity (see [Table of Consanguinity and Affinity](#)).**

**The relationship officers of Wealth Management may manage accounts of natural or legal clients up to the third degree of consanguinity and affinity, as long as the following conditions are met:**

- i.** Formal and written approval of the person up to the third degree of consanguinity and affinity, where he authorizes the management of the relationship.
- ii.** All transaction orders must be confirmed in writing by the person(s) authorized on the account(s).
- iii.** All terms, conditions, commissions and rates must be approved by a superior who is not in conflict of interest with the relationship as indicated in this Code of Ethics and Conduct.
- iv.** The relationship officer must immediately report to the Chief Executive with a copy to the Compliance Officer, any situation that generates a conflict of interest.



## Conflict of interest in employee activities

Employees and executives must avoid participating, directly or indirectly, in commercial or professional activities that generate a real or potential conflict of interest with Banco General, S.A. and Subsidiaries. The executive staff will be obliged to report annually in the data update form, those companies, associations, unions, trusts, non-governmental organizations, foundations or businesses that could generate a real or potential conflict of interest for them and in which the employee could be:

- ✓ Director or dignitary.
- ✓ Owner, partner or shareholder of more than 20% of the issued and outstanding shares.
- ✓ Person who exercises significant influence in the administration.
- ✓ Person who receives economic or material benefits.

Banco General, S.A. and Subsidiaries recognizes that it is impossible to cite or describe all possible real or potential conflicts of interest, therefore it trusts in the commitment and good judgment of its employees. It also trusts that they will seek advice when they deem it necessary, and that they will be guided by the highest ethical principles when evaluating professional and personal affairs.



## Conflict of interest with the receipt and delivery of gifts and hospitality

Hospitality or gifts must not be given or received unless they are in accordance with current Banco General, S.A. and Subsidiaries regulations, and therefore do not compromise commercial judgment. Promotional items that do not compromise commercial criteria are excepted (see [Receipt and delivery of gifts and hospitality](#))



## Communication

All communication from Banco General, S.A. and Subsidiaries must reflect the values and principles detailed in this Code of Ethics and Conduct.

- Our mass communication, advertisements, reports and other public communications must be built on the basis of transparency, which guarantees the community the reliability of the information and moral solvency that has always characterized us.
- All Bank communications, internal and external, use inclusive communication, promoting skills and ensuring that they do not display discriminatory, sexist or offensive messages or attitudes.

### What if...

#### **I see that someone is promoting false information about Banco General on social media?**

Remember that social media platforms, even though they have privacy settings, are public forums. Report the case to the Marketing area immediately. If it seems appropriate, always guided by common sense and the Bank's values, you can personally clarify negative information towards the Bank.

- All communication rules out participation in events that may conflict with the Bank's values.
- The Bank does not place television, radio, print or digital media advertisements whose strategy to attract consumers is to exploit violence, sex or drug use.



## Social media

The social media of Banco General, S.A. and Subsidiaries are managed by the Marketing department and their content and care are the responsibility of the team that uses the organization's Communication Manual as a basis.

Regarding the personal use of social media by directors, executives and employees, Banco General, S.A. and Subsidiaries respects their personal and private management, always expecting it to be done with responsibility, common sense and values, since these contents are public and permanent.

### General dispositions:

- Employees of Banco General, S.A. and Subsidiaries can promote the organization's public content on their personal social media, always using a positive attitude and common sense.
- Photos and content about work, colleagues, volunteer activities, among others, can be shared, always ensuring that confidential information of the organization is not revealed (documents, security locations), etc.
- Banco General, S.A. and Subsidiaries has already defined its public spokespersons. If an employee wishes to issue an opinion on a specific issue related to Banco General, S.A. and Subsidiaries, they must clarify that they are personal comments.
- The official communications of Banco General, S.A. and Subsidiaries are the only ones authorized to use the Bank's logo. Therefore, only authorized personnel can use it in their communications.
- Complaint response management is handled from the Customer Service and Marketing areas, through the channels designated for this purpose. However, if an employee detects any negative digital conversation, they must report it to the Marketing team, who will be in charge of channeling it.



## Receipt and delivery of gifts and hospitality

This regulation is a complement to the Code of Ethics and Conduct, and is intended to frame the delivery or acceptance of hospitality, gifts or other courtesies to avoid the generation of conflicts of interest.

It is not possible to give or accept gifts, courtesies or other presents, in circumstances in which it could be interpreted that the commercial criteria of Banco General, S.A. and Subsidiaries has been compromised.

Gifts, hospitality or other courtesies may be justified for legitimate business purposes and in all cases such considerations must be permitted by applicable law. Cash gifts are prohibited in their entirety, regardless of amount.

Acceptance of the following courtesies or gifts is allowed:

- One (1) gift with a nominal and appreciable value not greater than \$250.00 (two hundred and fifty dollars with 00/100) and on no occasion will it be cash.
- Promotional items that do not compromise commercial criteria.
- Customary and reasonable meals, as well as recreational activities at which the person you invite is present, such as business lunches or occasional sporting events.
- Gifts from relatives or friends with whom you do not have business relations.

In certain circumstances, it may be appropriate to accept the gift. In these cases and in the case of one (1) gift that has a nominal or appreciable value greater than \$250.00 (two hundred and fifty dollars with 00/100), the employee must notify the vice president of his area to request authorization.

Those gifts that are considered to be of excessive value (greater than \$250.00) or that could generate a situation of conflict, must be returned by the employee or the vice president of their area to the Marketing Department, where they will be in charge of sending a letter thanking the gesture and explaining the regulations of the company in this regard. In these cases, the Marketing Department will coordinate the donation of the gift to a charitable entity and will notify the client or provider as part of the regulation.

Gifts, hospitality and other courtesies to executive vice presidents will be reported by them, for its evaluation, to the President of the Bank.

If you have any doubts about whether or not it is appropriate to accept or give a gift, attention or other courtesy, you should raise it with the vice president of your area or through the "Social Responsibility and Ethics Committee" mailbox.





## Sexual harassment

This regulation seeks to frame the policy against sexual harassment in relations between the related parties of Banco General, S.A. and Subsidiaries.

We define sexual harassment as harassment with sexual motivations and content, carried out within the scope of the organization and/or management of a company, in physical, verbal, gestural or written form from a worker of any hierarchy to another of the same or another sex that has neither expressly nor tacitly requested it and that affects the work environment.

### General dispositions:

- Employees of Banco General, S.A. and Subsidiaries have the right to work in a healthy, safe environment that guarantees the physical, mental and social well-being of workers, as well as the moral integrity of each one.
- No employee of any hierarchy of Banco General, S.A. and Subsidiaries shall threaten or imply that the refusal of an employee to submit to unwelcome sexual solicitations will negatively affect that person's employment, compensation, promotion, assigned tasks, or any other term or condition of the collaborator or development of the career.
- Sexual jokes, lewd images, sexual objects and any conduct in which employees allow, support or facilitate improper acts are prohibited.

Employees who believe that they have been sexually harassed should report this situation as soon as possible to a person with the hierarchy of Manager, Assistant Vice President or Vice President of Human Capital.

- The reports and investigations on acts of sexual harassment that are carried out will be handled confidentially by the people who have access to said information or who are part of the act.
- Retaliation is a serious violation of this policy and must be reported immediately.
- Any employee who retaliates against another person for reporting a situation of sexual harassment will be subject to the established disciplinary sanctions, which may include up to termination of employment.
- The organization offers assistance and counseling for men and women subjected to a situation of sexual harassment.

# VIII Harassment

This regulation seeks to frame the policy against harassment in relations between the related parties of Banco General, S.A. and Subsidiaries.

We define harassment as offensive behavior that is normally understood as conduct intended to disturb, restrict rights, diminish freedom, humiliate an employee or a third party, and/or affect their dignity, in a systematic way.

## General Dispositions:

- Employees of Banco General, S.A. and Subsidiaries have the right to work in a healthy, safe environment that guarantees the physical, mental and social well-being of workers, as well as the moral integrity of each one.
  - No collaborator of any hierarchy of Banco General, S.A. and Subsidiaries shall threaten, harass or humiliate another collaborator or a third party.
  - Employees who believe they have been harassed should report this situation as soon as possible to a person with the hierarchy of Manager, Assistant Vice President or Vice President of Human Capital.
  - Any complaint filed by an employee will be handled confidentially, diligently, and all the necessary investigations will be carried out exhaustively to obtain the necessary elements to complete the investigation.
  - The reports and investigations on acts of harassment that are carried out will be handled confidentially by the people who have access to said information or who are part of the act.
  - Retaliation is a serious violation of this policy and must be reported immediately.
- Any employee who retaliates against another person for reporting a harassing situation will
- be subject to the established disciplinary sanctions, which may include up to termination of employment.
  - The organization offers assistance and counseling for men and women subjected to a situation of harassment.



# Table of consanguinity

## Consanguinity

## Affinity

Degrees

| Degrees |                          |   |                    |                                |                           | EMPLOYEE                  | SPOUSE OF EMPLOYEE                    |                     |                                      |                                  |
|---------|--------------------------|---|--------------------|--------------------------------|---------------------------|---------------------------|---------------------------------------|---------------------|--------------------------------------|----------------------------------|
| 1°      |                          | Mother                                      |                    | Father                         |                           | Children                  | Son-in-law and daughter-in-law        |                     | Mother-in-law                        | Father-in-law                    |
| 2°      | Grandparents             |   | Siblings           | Son-in-law and daughter-in-law |                           | Grandchildren             | Grandchildren by marriage             |                     | Grandparents by marriage             | Brother-in-law and Sister-in-law |
| 3°      | Great-grandparents       | Aunts and uncles                            | Nieces and nephews | Aunts and uncles by marriage   | Great-grandchildren       | Great-grandchildren       | Aunts and uncles by marriage          |                     | Great-grandparents by marriage       | Nieces and nephews by marriage   |
| 4°      | Great-great-grandparents | First cousins and first cousins by marriage |                    |                                | First cousins by marriage | Great-great-grandchildren | Great-great-grandchildren by marriage | Cousins by marriage | Great-great-grandparents by marriage |                                  |
| 5°      |                          | Second cousins                              |                    |                                |                           |                           |                                       |                     |                                      |                                  |



Ancestors and descendants of employee



Descendants of employee and spouse



Descendants of employee's spouse