

**CODE OF ETHICS AND CONDUCT FOR SUPPLIERS**  
**BANCO DE LA NACIÓN ARGENTINA**



Banco de la  
Nación Argentina

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## PURPOSE

This Code of Ethics and Conduct for Suppliers (hereinafter, the “Code”) establishes and sets forth the minimum ethical, legal, social, and environmental standards, values, and principles that must be met and observed by any supplier of goods and services intending to contract and/or be related to Banco de la Nación Argentina (hereinafter, the “Bank” or “Institution”).

In this sense, the Code is prepared in accordance with the guidelines established in the Code of Ethics and Conduct of Banco de la Nación Argentina.

## TARGET AUDIENCE – SCOPE

This Code applies to all the Bank’s suppliers who, directly or indirectly, develop a commercial relationship for the provision of services or goods, without distinction of nationality and place of provision of services. Any third party that is subcontracted by the original supplier is included, (as long as permitted), even in collaboration or assistance tasks, on an occasional or regular basis.

Consequently, the activities of the suppliers will be governed by the guidelines established in the Code, in addition to all other rules governing the activity and process of contracting and/or establishing relationships with the Bank, all of which must be complied with before, during, and after execution of the contract.

## REQUIREMENTS FOR SUPPLIERS

Suppliers shall undertake to comply with this Code. In addition, they shall meet the requirements established in the Institution’s Procurement and Contracting Regime and abide by the guidelines established in the Code of Ethics and Conduct of Banco de la Nación Argentina, which are posted on the Bank’s institutional website.

## PRINCIPLES AND EXPECTED CONDUCT

Prior to and throughout the contractual relationship, the Bank’s suppliers are expected to act in accordance with the values and principles set forth below.

## INTEGRITY

Suppliers must behave diligently, ethically and in good faith, fulfilling their obligations and seeking continuous improvement both towards their counterparties and third parties.

They must also maintain high ethical standards, ensuring integrity and accountability in all their actions. In addition, they must act by showing honesty and loyalty, and fostering business relationships based on trust.

Suppliers undertake to fully and unrestrictedly comply with applicable laws and shall report any situations or regulations that may modify or alter normal implementation of the guidelines set forth in this Code.

They must act in a transparent and open manner, providing accurate and complete information, respecting this principle of integrity.

## HUMAN RIGHTS

Suppliers must respect Human and Labor Rights, acting in accordance therewith, in such a way that they convey the spirit of the Institution's values to their own value chain. Respect for others must prevail at all times, maintaining fair and equitable treatment in all relationships.

They shall observe all labor, pension, social security, wage, union, and other laws and regulations applicable to labor and business relations in the countries in which they operate. Forced labor, involuntary labor, child labor, gender-based violence, workplace violence, and gender-based violence in the workplace are prohibited.

The principles and values promoted by the Institution encourage suppliers to offer equal opportunities in the workplace by discouraging discrimination based on race, gender, language, religion, political or other opinion, nationality, sexual orientation, health status, age, disabilities, marital status, pregnancy, or other characteristics. In turn, suppliers are expected to provide a safe and healthy working environment for all their members of staff in order to prevent casualties and injuries, by providing appropriate personal protective equipment and training.

As regards labor and Human Rights matters, any act of harassment and/or physical or psychological intimidation by the supplier, their employees and/or contractors, even when occurring outside of their usual tasks, will be considered undesirable conduct. Insulting words or gestures, verbal abuse, threats, malicious and false statements about other people will also be considered undesirable behavior.



## ENVIRONMENTAL CARE

The Bank adheres to the Global Compact, UNEP FI and the Principles for Responsible Banking, undertaking to care for and protect the environment.

In this regard, the Bank is committed to conveying to its suppliers the values, principles, and responsible behavior of the Institution in terms of sustainability, promoting good governance practices towards the community and the environment.

Suppliers are expected to respect the environmental legislation applicable to their activity, both in relation to the Bank and any other contractual relationship, and to act in an environmentally responsible manner, adopting sustainable practices to avoid, minimize and ultimately compensate for negative environmental impact that may result from their activities. In addition, they must promote sustainable development in all their operations and processes, preferably seeking to establish internal policies ensuring responsible behavior.

## BRIBERY, FRAUD, AND CORRUPTION

The Bank has zero tolerance for fraud, bribery or corruption, and expects the same from suppliers. For this reason, any alleged incident will be investigated and may lead to the corresponding actions according to current internal and external regulations.

The Bank prohibits, throughout its value chain, receiving or offering facilitation payments, in cash and/or in kind, made to modify the normal and customary course of any operation or procedure, regardless of the amount.

A determining reason for rejection of the proposal or offer, at any stage of the procurement procedure, or for termination of the contract, without prejudice to criminal and other legal actions that may arise, shall be any person who gives or offers money or any gift, so that:

- Officers or employees of the Bank -under any modality-, with authority regarding engagement or execution of a contract, do or refrain from doing something related to their functions.
- Officers or employees of the Bank -under any modality- assert their influence over another officer or employee, with the above-mentioned authority, so that they do or refrain from doing something related to their functions.
- Any person asserting their influence over an officer or employee of the Bank with the above-mentioned authority, so that they do or refrain from doing something related to their functions.

Anyone having committed such acts for direct or indirect benefit of the supplier, whether as representatives, administrators, partners, agents, managers, employees, contractors, business managers, trustees, or any other natural or legal person, will be held liable for this conduct.

## CONFLICT OF INTEREST

Suppliers must avoid situations that could give rise to a conflict of interest, which is understood as any situation in which private or personal interests conflict with the Bank's business or interests.

Suppliers shall not make or accept gifts to and from the Bank's staff or persons linked to the Institution, which could affect the independence and integrity of their professional performance, or which could imply, at the present time or in the future, a conflict of interest or any obligation or preferential treatment.

Suppliers must also act independently, avoiding any kind of influence that could affect impartiality in decision-making. Any person involved in a conflict of interest must refrain from intervening or participating in the relevant dealings.

## CONFIDENTIALITY OF INFORMATION AND PRIVILEGED INFORMATION

Suppliers, their agents and related third parties undertake to maintain strict confidentiality of all Information provided by the Bank, as well as any other Bank Information that may come to their knowledge on the occasion of contracting and provisioning of service(s) or during the relevant time.

For the purposes hereof, "Confidential Information" means all information related to the Bank's processes, business, customer or employee information and any other information that must be kept confidential by virtue of a legal obligation, as well as any other information deemed as "Confidential Information" at the time of disclosure to the Supplier.

Any disclosure and misuse of privileged information is expressly prohibited. "Privileged Information" means information that, by referring to facts or circumstances that other people are unaware of, could generate some advantage for those having access to it. "Privileged Information" includes data unavailable for the public which disclosure may have a significant impact.

In addition, Suppliers shall not use for their own benefit, nor provide to third parties, nor disclose any Confidential Information and/or Privileged Information, to which they may have access due to the provision of services under this contract, without prior express consent of the Bank, undertaking full responsibility for any breach of such obligation.

Suppliers must comply with supplementary laws and regulations on personal data protection, privacy and information security applicable in the countries in which they operate and under the provisions governing the relationship between suppliers and the Bank, using the information received only for the purpose for which it was provided. They must also protect and respect all intellectual property rights of the Institution.

The target audience of this Code must also immediately inform the Bank of any occurrence and/or incident, unauthorized access, disclosure or loss in relation to the information under their responsibility, as well as any theft, damage, destruction, intended cyberattack, etc.

They shall also ensure the handling of data (integrity, accuracy, and traceability) as well as continuity of their services, minimizing any disruption that may affect the Bank's operations.

The Bank may require any supplier to identify the data and information protection measures, as well as any mechanisms to identify and manage the risks inherent in their activities.

## COMMITMENT

Suppliers related to the Bank must act in accordance with this Code, since all parties with whom the Institution interacts are expected to perform in accordance with the values promoted by the Institution, as well as to comply with applicable anti-corruption, anti-bribery, ethics, relevant international conventions, anti-money laundering or terrorist financing laws.

In addition, they shall represent that they are aware of and accept the obligations pertaining thereto under applicable and effective legal and regulatory provisions, as amended by BCRA, which may be applicable as a result of the provision of the contracted service.

Upon occurrence at the beginning of or during their relationship, suppliers must inform the Bank of the existence of conflicts of interest, whether potential, actual, or apparent. They must also report any act of fraud, bribery or corruption, as well as any situation or fact that poses risk for, and/or affects or may affect, the image and/or reputation of the Bank.

Occurrence of any of the conducts contemplated in this Code shall constitute grounds for rejection of the proposal or offer at any stage of the procurement procedure, or termination of the contract, without prejudice to the corresponding legal actions.

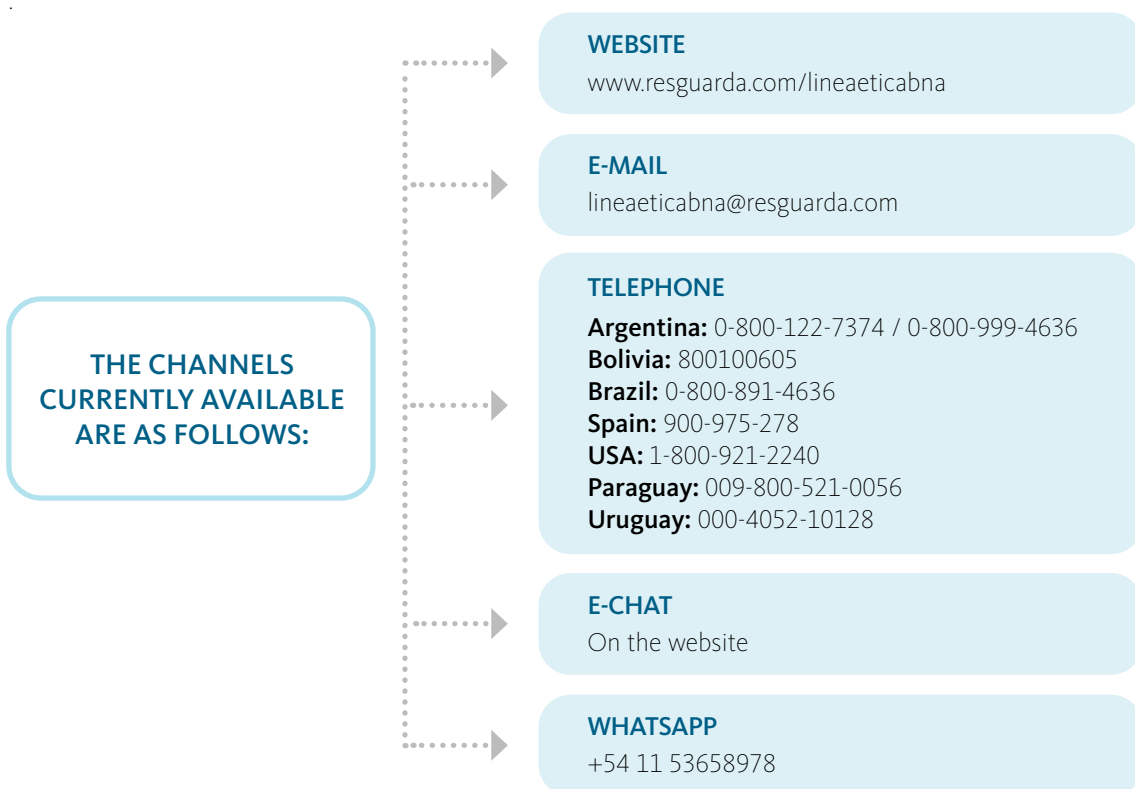
The Bank may evaluate the continuity of the relationship with a supplier, in light of facts hindering transparency, honesty, and integrity.

In no case may the supplier claim unawareness of the contents of this Code or the regulations in force.

## REPORTING CHANNELS – BNA ETHICAL LINE

The Bank requires its suppliers to report any situation contrary to this Code and/or the **Code of Ethics and Conduct** for Bank personnel, through the reporting channels provided by BNA's "*Línea Ética*" (Ethical Line), in a strictly confidential and independent manner.

5 (five) alternative channels are available so that users can contact each other in a secure and strictly confidential manner and with the possibility of remaining anonymous. Suppliers undertake to use such channels in good faith, assuming responsibility for improper or abusive use thereof.



## ENQUIRIES

Any enquiry regarding this Code and application thereof may be made via e-mail to: **integridad@bna.com.ar**

## EFFECTIVE DATE AND APPROVAL

This Code has been approved by the Board of Directors of the Institution, effective as from 12/10/2024.

## ANNEX I – GLOSSARY

**Bribery:** Offering, promise, delivery, acceptance, or demand of an incentive to perform an illegal and unethical action or an action presuming a breach of trust. Incentives may consist of gifts, loans, fees, rewards, or other advantages (taxes, services, donations, etc.).

**Child labor:** Work that deprives children of their childhood, their potential and dignity, and that is detrimental to their physical and psychological development.

**Confidential information:** All information of which someone may gain knowledge as a result of the performance of their duties, except as provided for under the regulations governing administrative secrecy or privilege.

**Corruption:** A form of abuse of authority that may be used for somebody's own benefit or for the benefit of third parties. This may involve the offering, delivery and/or reception of something of value and/or any benefit in order to influence a decision and/or behavior in order to get an improper benefit.

**Environmental Rights:** Rights and obligations to ensure rational use of natural resources, both at present and in the future, protecting the environment in which operations are conducted, within a framework of sustainable development.

**Ethics:** Set of customs and standards governing or assessing the behavior of people within a community.

**Forced labor:** Work or service demanded of an individual under threat of any penalty and for which the individual does not volunteer.

**Fraud:** To willfully deceive another person in order to take an undue or illegal advantage (whether financial, political or otherwise).

**Human Rights:** Rules that recognize and protect the dignity of all human beings. These rights govern the way in which individuals live in society and relate to each other, as well as their relations with the State and the State's obligations towards them.

**Integrity:** A fundamental value consisting in doing what is right in accordance with the highest ethical and moral values. It is the virtue whereby a person acts according to the voice of consciousness to do what is right, fair and honest.

**Labor Rights:** Rights and obligations of workers and employers based on the General Labor Regime.  
Ethics: Set of customs and standards governing or assessing the behavior of people within a community.

**Privileged information:** Information which, as it refers to events or circumstances unknown to other persons, may give advantage to those people having such information. Privileged information includes data unavailable for the public which disclosure may have a significant impact.

**Public officer:** Any officer or employee of the State or agencies thereof, including those selected, appointed or elected to perform activities or duties in the name of the State or serving the State, at all hierarchical levels.



## ANNEX I – GLOSSARY

**Regulatory practices:** A set of actions, procedures, and standards that an organization follows to ensure compliance with regulations and laws applicable to a specific industry or sector.

**Supplier:** any natural or legal person, who on a regular or occasional basis, provides goods or services, of whatever nature, either by itself or through a contracted third party.

**Third parties:** Providers, consultants, contractors, subcontractors, and their relevant members performing actions with the Bank, either directly or for and on behalf of the Bank.



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