

CODE OF ETHICS AND CONDUCT FOR SUPPLIERS

Banco Nación

CONTENTS

3 › INTRODUCTION

3 › PURPOSE

3 › IMPLEMENTATION

3 › SCOPE

4 › INTEGRITY

4 › COMMITMENT AND RESPONSIBLE MANAGEMENT

5 › BRIBERY, FRAUD, AND CORRUPTION

5 › CONFLICT OF INTEREST

6 › GIFTS AND HOSPITALITY

6 › CONFIDENTIALITY OF INFORMATION

6 › PRIVILEGED INFORMATION

7 › COMPLIANCE

7 › REPORTING CHANNEL – BNA ETHICAL LINE

8 › ENQUIRIES

8 › EFFECTIVE DATE AND APPROVAL

9 › ANNEX I – GLOSSARY

INTRODUCTION

This Code of Ethics and Conduct for Suppliers (hereinafter, the "Code") sets forth the conduct standards, values, principles and minimum integrity and compliance guidelines that shall be met and observed by all legal and natural persons maintaining, currently or potentially, a business or contractual relationship with Banco de la Nación Argentina (hereinafter, the "Bank" or "Institution"), in their capacity as suppliers of goods and services.

PURPOSE

This Code aims at promoting business relationships based on ethics, integrity, transparency, responsibility and compliance with regulations in force, contributing to the prevention of inappropriate conducts and to the strengthening of a culture of integrity throughout the entire value chain of the Institution.

The provisions stated herein supplement the guidelines set forth in the Code of Ethics and Conduct of Banco de la Nación Argentina and promote conduct standards in line with values guiding the operations of the Institution.

IMPLEMENTATION

Adherence to this Code shall be binding at the time of registration in the Registry of Suppliers of the Bank.

SCOPE

This Code is binding on all the Bank's suppliers who, directly or indirectly, maintain a commercial relationship for the provision of goods or services, without distinction of nationality or place of rendering of services.

Moreover, third parties, subcontractors, agents, consultants or collaborators involved in the execution of goods or services engaged are hereby covered.

INTEGRITY

Suppliers must act with diligence, honesty, good faith, professionalism, and transparency in all activities related to the Bank, acknowledging, respecting and complying with integrity standards, maintaining conduct standards in line with ethical, integrity and transparency principles, fostering business relationships based on trust.

Moreover, they shall fully comply with regulations in force, applicable internal regulations of the Bank, contractual obligations undertaken, and the provisions stated in this Code, promoting responsible practices and a compliance culture in the performance of their activities.

In this regard, they shall refrain from participating in unlawful, fraudulent, corrupt or misleading practices, and immediately report any situation that may imply regulatory non-compliance and/or a violation of the principles set forth in this Code or a reputational risk to the Bank.

These principles shall be promoted by suppliers among their employees, representatives and third parties related to their activities.

COMMITMENT AND RESPONSIBLE MANAGEMENT

The Bank adheres to the UN Global Compact, the United Nations Environment Programme Finance Initiative (UNEP FI), and the Principles for Responsible Banking. In this regard, the Bank fosters among its suppliers the adoption of values and principles, guiding their performance in relation to sustainability, and promoting good practices regarding environmental care and management.

Suppliers are expected to strictly comply with all applicable laws, rules and standards as regards environmental, labor, safety and hygiene issues, among other, as well as with the internal guidelines of the Bank. Moreover, they shall perform their activities in a responsible manner, ensuring decent and safe work conditions, respecting the integrity of people, avoiding any type of discrimination, workplace violence, forced or child labor, and promoting practices based on equity, inclusion and mutual respect.

Similarly, suppliers are expected to adopt practices which minimize negative environmental impacts resulting from their transactions, promoting the efficient use of resources, reduction of environmental impact and adequate management of waste, as well as the progressive inclusion of sustainability criteria in their processes and decision-making. For such purposes, it will be worth having management systems, policies or procedures fostering responsible social and environmental performance.

The Bank will not tolerate any conduct contrary to these principles, and suppliers are expected to fully commit with integrity and respect towards other people.

BRIBERY, FRAUD, AND CORRUPTION

The Bank has zero tolerance for fraud, bribery or corruption, and expects the same from suppliers. Therefore, any alleged incident may be investigated thoroughly and lead to the relevant contractual penalties and legal actions, pursuant to internal regulations and laws in force.

The Bank prohibits, throughout its value chain, the offering, promise, delivery, request, acceptance and receipt of facilitation payments, in cash and/or in kind, made to modify or accelerate the normal course of operations or procedures, regardless of the amount.

As a result, suppliers shall refrain from offering, promising, authorizing, delivering, requesting or accepting, directly or indirectly, payments, benefits, gifts, favors, undue advantages or any other type of compensation, whether in cash or in kind, for the purposes of influencing, obtaining, maintaining or directing businesses, decisions, contracting, authorizations, procedures or any other action for their own benefit or the benefit of third parties.

A determining reason for rejection of the proposal or offer, at any stage of the contracting 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

Pursuant to Decree No. 202/2017, suppliers shall declare, at the time of registration in the registry of suppliers of the Bank, the existence of relationships with officers covered by such regulations, through the submission of the relevant Conflict of Interest Affidavit through the *Plataforma de Trámites a Distancia (TAD)* (platform for remote operations).

Information set forth in the Conflict of Interest Affidavit shall be complete, accurate and updated, committing to timely report any amendment that may have an impact on the content of the duly submitted affidavit.

Moreover, they shall cooperate with information and documentation requirements made by the Bank for the purposes of verifying, assessing and managing potential conflict of interest situations, refraining from omitting or falsifying relevant information relating to assumptions covered by applicable regulations.

GIFTS AND HOSPITALITY

Suppliers, as well as persons acting on their behalf, shall not offer, promise, grant, request or accept any gifts, hospitalities, invitations, trips, benefits or perquisites of any kind that may affect, condition or pretend to affect the objectivity, Independence or impartiality of decisions related to the business or contractual relationship with the Bank.

Suppliers shall perform their activities independently and with professionalism, refraining from any conduct that may be construed as an attempt to obtain undue advantages or to influence the decisions of employees, authorities or people related to the Bank.

CONFIDENTIALITY OF INFORMATION

Suppliers, as well as their employees, assistants, agents, subcontractors, consultants and any other third parties intervening on their behalf in the execution of the goods or services engaged, shall maintain the strictest confidentiality in respect of all information provided by the Bank or to which they have access by reason of the contractual relationship, during the validity period and after termination when the nature of the relevant information or obligations so require.

Confidential information shall be deemed as all such information relating to activities, operations, processes, strategies, systems, products, customers, users, employees, providers or any other aspect relating to the Bank which disclosure is not authorized or is protected by legal, regulatory, or contractual provisions, or due to their own nature. Furthermore, it also comprises all information covered by duties of confidentiality, financial, banking, or professional secrecy, as well as such information expressly identified as confidential at the time of communication thereof.

PRIVILEGED INFORMATION

It is expressly prohibited the use, disclosure, communication, reproduction, or any other form of improper use of privileged information to which the provider, their assistants, agents or related third parties have access by reason of the contractual relationship with the Bank.

For the purposes of this Code, "privileged information" refers to such non-public information in relation to the Bank, its transactions, customers, businesses, markets or any other event or circumstance which, due to its nature, may grant undue advantage to whom is aware of such information or the disclosure of which may significantly affect the decision-making of third parties.

The provider shall adopt the necessary measures to preserve its confidentiality and to prevent any access, use or unauthorized disclosure, except for express prior authorization by the Bank. Furthermore, it shall comply with laws and applicable rules as regards protection of personal data, privacy and safety of information, as well as contractual provisions and further applicable policies and procedures of the Bank.

The target audience of this Code shall immediately inform the Bank of any incident, unauthorized access to information under their responsibility, as well as any event that may have an impact on confidentiality, integrity or availability, including any theft, damage, destruction, intended cyberattack, or other similar events.

Furthermore, any access, use or unauthorized disclosure of privileged information shall be immediately reported to the Bank.

Non-compliance with obligations stated herein shall give rise to relevant contractual, administrative and/or legal liabilities, including, where applicable, liabilities for damages.

COMPLIANCE

Compliance with provisions stated herein shall be binding at all stages of the relationship with the Bank, including stages prior to engagement, contract execution and, where applicable, obligations surviving termination.

Non-compliance with the conduct guidelines, obligations and principles stated herein, as well the existence of circumstances, background information or behavior that enable to reasonably question the integrity, transparency or suitability of the provider, may be considered enough reason for the implementation of the relevant measures, including the exclusion of engagement processes, the disregarding of offerings, non-awarding of contracts, the termination of contractual relationships in force or any other action stated in the applicable regulations.

The implementation of measures stated herein shall not limit the execution of the relevant administrative, civil or criminal actions, pursuant to regulations in force.

REPORTING CHANNEL – BNA ETHICAL LINE

BNA's *"Línea Ética"* (Ethical Line) constitutes an institutional mechanism aimed at receiving reports and claims relating to alleged irregularities in respect of the provisions stated in this Code, the Code of Ethics

and Conduct of Banco de la Nación Argentina or in applicable regulations, ensuring confidentiality of the information received.

In this regard, suppliers shall report, through the reporting channels enabled by the Institution, any event, conduct or situation of which they become aware, and which may entail an infringement of those provisions.

The Ethical Line shall be used in a responsible manner and in good faith, for the purpose of contributing to an early detection of irregular situations and to the strengthening of integrity, transparency and compliance mechanisms promoted by the Institution.

Available channels

Any situation contrary to this Code may be reported in a strictly confidential and independent manner, with the possibility of anonymity, reserved identity or explicit identity, through the following alternative channels:

- **Website:** www.resguarda.com/lineaeticabna
- **E-Mail:** lineaeticabna@resguarda.com
- **Telephone:**
  Argentina: 0-800-122-7374 / 0-800-999-4636
  Bolivia: 800100605
  Brasil: 0-800-891-4636
  España: 900-975-278
  Estados Unidos: 1-800-921-2240
  Paraguay: 009-800-521-0056
  Uruguay: 000-4052-10128
- **E-chat:** on the website
- **WhatsApp:** +54 11 53658978

NO RETALIATION COMMITMENT FOR WHISTLEBLOWERS

The Bank is committed to protecting users of the Ethical Line, defining protection measures for persons reporting a situation in good faith through BNA's Ethical Line.

ENQUIRIES

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

EFFECTIVE DATE AND APPROVAL

The latest version of this Code has been approved by the Board of Directors of the Institution, through Resolution N°. 1751, effective as from 09/10/2026.

ANNEX I – GLOSSARY

› **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.

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

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

› **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.

› **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.

› **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.

› **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.

› **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:** Tany 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.

› **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.).

› **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

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

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


Banco Nación