Corporate Governance Code

XI Revision

Banco de la Nación Argentina

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1. PURPOSE AND SCOPE

1.1 Purpose

The Institution acknowledges the significance of having a regulatory framework that ensures good Corporate Governance, consolidating a model based on aspects that ensure transparency in management and relevant accountability, as well as the determination of levels and scope of responsibility of BNA and its members of staff. Moreover, it promotes compliance with its corporate purpose, the review of the corporate social and environmental aspects, and the implementation of an adequate risk management framework. In this sense, it intends to ensure an environment with equal treatment and respect as regards the right to equal opportunities discouraging discrimination of any kind and for any cause, especially based on gender, race, ethnics, age, disabilities, and sexual orientation.

1.2 Scope

This Corporate Governance Code establishes the structure, composition, functions, and responsibility of the governing bodies of BNA. Its purpose is to contribute to the adequate development of the Institution's activity and achievement of the purposes set forth in the Charter of the Bank, all in accordance with governance best practices and transparency policies.

Moreover, it includes guidelines for BNA Group Companies and Foreign Branches. In this sense, it serves as basis for suitability and/or updating of their respective codes, internal regulations and practices, to the extent that its implementation be consistent with regulations in force in each jurisdiction.

2. BANCO DE LA NACIÓN ARGENTINA

2.1 Legal System

BNA is a State-owned autarchic entity created by Law No. 2841 passed by the National Congress on 10/16/1891. Its Charter in effect was enacted through Law No. 21799 "Charter of Banco de la Nación Argentina", dated 05/18/1978. Pursuant to its legal nature, it has budgetary and administrative autonomy. It is governed by the provisions under Law No. 21526 "Law on Financial Institutions", its Charter, and other related legal rules, acting in coordination with the economic and financial policies established by the National Government. The general rules issued for the organization and operation of the National Public Administration, particularly the acts that may result in restrictions on the legal capacity or powers granted by reason of its specific regime shall not be applicable to the Bank (Charter Art. 1). The Bank's transactions are guaranteed by the Republic of Argentina (Charter Art. 2) and its registered office is that of its Head Office, located at Bartolomé Mitre 326 in the City of Buenos Aires (Charter Art. 7).

2.2 History

Banco de la Nación Argentina was created during Carlos Pellegrini's administration, at a crucial time in the institutional life of the country, as a strategic response of the National State to the severe financial crisis affecting particularly the Argentine Republic, threatening the banking system and the commercial and economic activity. In such critical circumstances, the first Board of Directors was constituted on 10/26/1891, establishing an institution intended to have a key role in the national reconstruction and development.

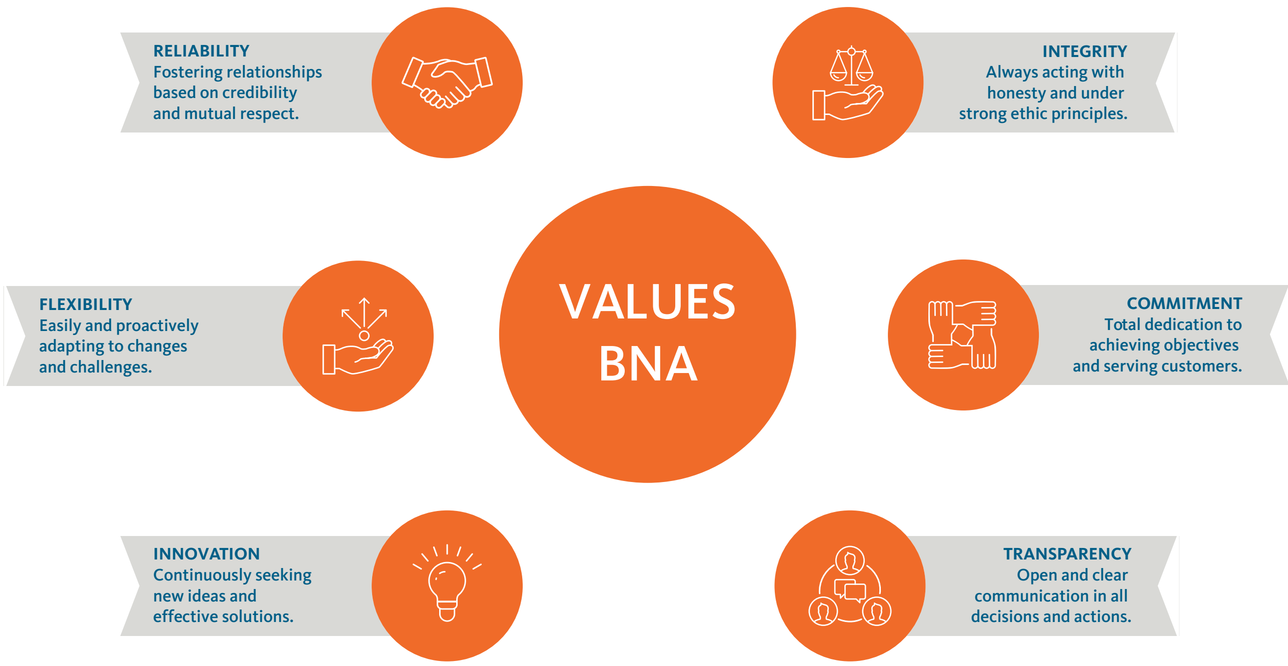
In this regard, the creation of "a big National Bank that would include in its line the entire Republic" was promoted, "with the double purpose of attending to present demands and the future economic development" having "all the guarantees of a good administration (excerpt of the proposal of President Carlos Pellegrini in his speech to the National Congress when submitting the bill for the creation of the Bank). From the beginning, BNA was considered as a key instrument of the State's economic policy, aimed to public interest and social welfare.

According to its law of creation, Banco de la Nación Argentina was entitled to all the powers, rights, and prerogatives that had been granted to its predecessor, "Banco Nacional". In a few years, it included in its line the entire territory of the country, becoming the largest commercial bank in Argentina, strongly and actively participating in the main events of the economic life of the country. In this sense, its commitment to the rural sector was crucial in supporting productive growth and to the worldwide recognition of the Republic of Argentina in the agribusiness sector.

2.3 Mission, Vision and Values

In accordance with the provisions of Article 3 of the Charter, Banco de la Nación Argentina launched its Strategic Plan, approved by a resolution of the Board of Directors, which sets out its mission: To be the national bank of choice for Argentinians due to its strength, efficiency, competitiveness, transparency and quality of service, providing a positive digital experience for all customers and employees; and its vision: To contribute to the improvement and sustainable development of all Argentinians.

Both the mission and the vision are supported by a set of fundamental values that form the basis of its institutional identity and shape its organizational culture. This culture constitutes the Institution's DNA, making it unique and special. It is reflected in the values, conduct, beliefs, principles, symbols, and standards that constitute an organization's identity, and in each person who makes up the Institution.



Building on these values, a management model based on shared principles has been established, promoting commitment, integrity, accountability and excellence in performance, ensuring consistency between strategic objectives and day-to-day activities.

Within this framework, the behavioral compliance approach is integrated as a central component of the Bank's institutional design, in line with the Charter and the principles defined in its Strategic Plan. Compliance is considered as a system that directly influences organizational behavior, incorporating ethical, quality, security and transparency criteria into processes, incentives and decision-making environments. Accordingly, integrity is embedded in the organizational culture, the institutional identity that defines and guides the Bank's conduct, And translates into practices that prevent risks, reinforce individual and collective responsibility, and promote conducts aligned with the fundamental values of the Institution.

2.4 Strategic Role

The Bank plays a central role in the national economy, with an institutional focus on development, sustainability, contributing to the country's economic and social growth, and promoting financial inclusion as a key tool to narrow gaps and foster greater integration of the population into the financial system.

As part of its institutional activities, the Bank is strengthening its support for Argentine SMEs and households through financing instruments designed to strengthen the productive sector and meet the needs of households. Such credit facilities (intended for investment, working capital, consumption and housing) promote innovation, job creation and equitable access to development opportunities.

This strategy is strengthened by BNA's extensive nationwide presence, which enables it to play an active role in supporting communities and promoting financial inclusion across the country. Within this framework, the institution reaffirms its commitment to sustainability and the adoption of best practices in corporate governance, promoting transparent and responsible management in line with the highest international standards.

2.5 Strategic Plan

BNA presents the Carlos Pellegrini Strategic Plan as the instrument that will direct and guide the Institution's actions in the coming years, establishing a clear and coherent framework for its development. It covers the Bank's mission, vision, values and strategic objectives, from which goals and guidelines are defined to guide the Institution in one direction: serving as the foundation for the development of business plans, systems, and transactions.

Its main purpose is to consolidate the Bank's business, contributing to its growth and positioning to reaffirm its leadership within the national financial system. In this context, the Plan drives initiatives aimed at strengthening an innovative and proactive institution with a strong presence throughout the country.

It also promotes the development of an organizational culture based on integrity, public ethics and transparency, through ongoing training programs that foster the understanding and application of management principles, standards and mechanisms aimed at preventing corruption and strengthening the Institution.

The Plan encourages the participation of everyone in the institution, regardless of their hierarchical level, recognizing them as strategic participants in the construction and consolidation of an institutional global culture, as well as in the implementation of the defined guidelines. Finally, it considers performance evaluations and ongoing improvement that enable the impact of training initiatives in the workplace to be measured and ensure the ongoing updating of the plan.

2.6 International Presence

Within the framework of strategic functions and objectives, Banco de la Nación Argentina has established a significant international presence in the commercial and financial sectors.

This expansion is supported by a network of eleven subsidiaries strategically located in key economic centers: New York and Miami (USA), Madrid (Spain), São Paulo (Brazil), Montevideo (Uruguay), Santa Cruz de la Sierra (Bolivia), and Asunción (Paraguay). The branches in Concepción, Encarnación, Villarrica, and Villa Morra report to Asunción (Paraguay). The Bank also has a representative office in Beijing (People's Republic of China).

Each of the foregoing adapts to the specific regulatory, economic and cultural characteristics of the jurisdiction in which it operates, contributing to promote international business and facilitate financial links between Argentina and the markets in which the Bank has presence.

2.6.1 Payment of bonus at foreign branches

BNA's foreign branches, located in the Northern Hemisphere (Miami and New York), award an annual individual bonus to staff, based on the performance of the employees and the branch.

2.7 BNA Group Companies

Within the framework of its corporate strategy and in addition to its financial activities, Banco de la Nación Argentina has established BNA Group, comprising: Nación Servicios S.A., Nación Reaseguros S.A., Nación Seguros de Retiro S.A., Nación Seguros S.A., Nación Bursátil S.A. and Pellegrini S.A., companies engaged in specialized activities linked to the financial system and rendering of supplementary services. Through these companies, the Bank diversifies its range of products and services and strengthens its position in various market segments, in line with its strategic objectives and institutional mission.

Each of these companies has its own management and supervisory bodies, in accordance with applicable corporate and regulatory standards, seeking to maintain corporate governance standards aligned with the principles and guidelines promoted by Banco de la Nación Argentina.

3. ORGANIZATIONAL STRUCTURE

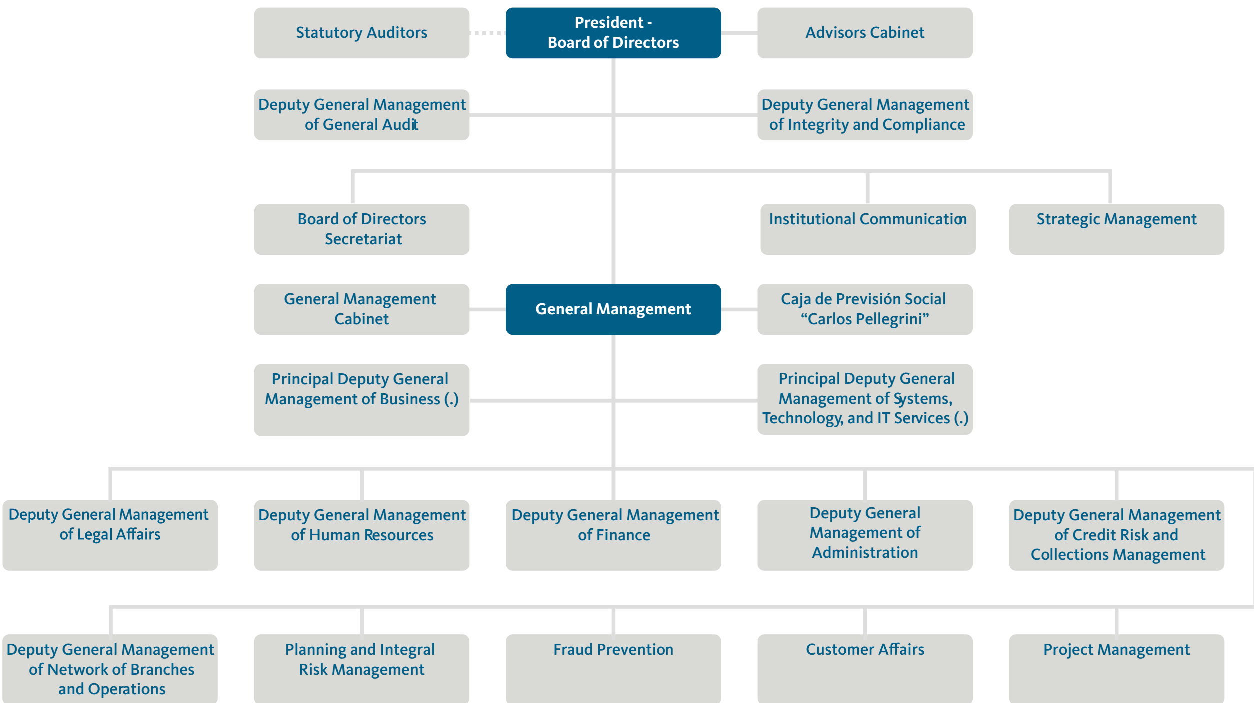
Banco de la Nación Argentina operates through an organizational structure that combines departments at Head Office and the Branch Network, as detailed below:

Network of service and institutional presence			
Location	**Type**	**Number**	**Details**
Argentina	Branches	708	650 branches, 53 operating annexes, 4 on-site banking and 1 branch without separate accounting.
	Electronic Branches	10	-
	Points of Promotion	5	-
	Administrative office	1	-
	Mobile branches	3	-
	Head Office	1	-
Abroad	Branches	4	Nueva York, Madrid, Montevideo and Santa Crus de la Sierra.
	Agencies	3	Miami, São Paulo and Asunción
	Sub-agencies	3	Concepción , Encarnación and Villarrica (Paraguay)
	Customer Service Center	1	Villa Morra (Paraguay)
	Representative Office	1	Beijing (China)

As of 31 December 2025, BNA's staffing amounted to 15,373 employees, including 15,303 permanent employees and 70 temporary employees.

In addition, there were 194 Argentine employees working abroad.

3.1 Organizational Chart



(.) Principal Deputy General Management

3.2 Governance

The Bank is managed by a Board of Directors, consisting of a President, a Vice President, and eight Directors; all of them are native Argentine citizens, by option or naturalized, having exercised their citizenship for a minimum period of ten years (Charter Art. 9). The President, Vice President, and Directors are appointed by the National Executive Branch and remain four years in office, with the possibility of being reappointed (Charter Art. 10 and Art. 12).

3.3 President and Vice President

The President is the legal representative of the Institution and oversees management thereof. In addition, the President is in charge of enforcing the provisions of the Charter and other regulatory and legal provisions, the execution of which pertains to the Bank. The President is authorized to act in and resolve all those issues not expressly reserved to the decision of the Board of Directors (Charter Art. 14°).

3.3.1 Functions of the President and Vice President

The duties of the President are as follows (Charter Art. 14):

- To preside over the meetings of the Board of Directors.
- To take part in the internal commissions of the Board of Directors.
- To propose to the Board of Directors the appointment of the General Manager, Deputy General Managers, and Departmental Managers of the Bank.
- To appoint, transfer, promote, and impose sanctions on the officers and employees of the Bank, according to the rules issued by the Board of Directors, informing the same about the decisions adopted.
- To propose to the Board of Directors the hiring of temporary staff for the rendering or performance of services and, only occasionally, for executive or advice tasks.
- In cases of urgent need, the President may resolve those issues inherent in the Board of Directors together with the Vice President and a Director or with two Directors, informing thereof to the Board in the first regular meeting to be held. Any officer replacing the President shall be empowered with the same authority.
- To assume the representation of the Institution and to grant the necessary powers for the legal representation of the Bank.

The Vice President shall exercise the duties of the President in case of absence or impediment of the latter. Should the office become vacant, the Vice President shall exercise the duties of the President until a new president is appointed. Furthermore, they shall perform the duties entrusted by the President, within those pertaining to the position (Charter Art. 10).

The Second Vice President will replace the President or Vice President, as necessary (Charter Art. 15 subparagraph n).

Should the President or the Vice President die or resign or otherwise become disabled or leave office before the expiration of the term for which they were appointed, the National Executive Branch shall designate the substitutes, to complete the term (Charter Art. 10 and 11).

3.4 Board of Directors

Directors shall be appointed by the National Executive Branch, and they shall equitably represent the different sectors, activities, and regions that constitute the national economic activity.

They shall remain four years in office and may be reappointed. Should any of them die or resign or otherwise become disabled or leave office before the expiration of the term for which they were appointed, another person shall be appointed according to the provisions of the Charter, in order to complete the term. (Charter Art. 12).

The following persons shall not be eligible to act as members of the Board of Directors (Charter Art. 13):

- Those persons included in the provisions of incapacity set forth in the Law on Financial Institutions or lacking a well-known reputation.
- Those persons who are part of or report to the management, administration, representation or supervisory committee of other banks or financial institutions, except when, for their being members of the Board of Directors of Banco de la Nación Argentina, they are members of other banking or official institutions.
- Those persons holding other offices or positions remunerated or compensated in any way whatsoever, directly or indirectly subject to national, provincial or municipal governments. Those engaged in teaching activities shall not be included in the provisions of this paragraph.
- Those persons who are part of legislative or judicial bodies, whether national, provincial or municipal.

The remuneration of the President, Vice President, Directors and Statutory Auditor shall be fixed by the National Executive Branch (Charter Art. 31).

3.4.1 Functions of the Board of Directors

Las principales funciones del Directorio son:

According to Art. 15 of BNA Charter, the Board of Directors shall:

- Establish the rules for the economic and financial management of the Bank, decide on transactions with the customers, and resolve the cases not specified in such rules.
- Determine the characteristics and conditions of the Bank's transactions and fix the interest rates, discounts, commissions, and terms therefor.
- Fix and approve on an annual basis the budget, adjustments thereof and the action plan of the Bank, escalating them to the Ministry of Economy for acknowledgement (repealed by Article 41 of Law No. 22602 on the General Budget for Fiscal Year 1982).
- Establish the regime of recruitments, subsidies, and donations to be followed by the Bank.
- Establish the functional organization of the Bank and issue the internal rules, as well as administrative and accounting regulations.
- Open and close branches, agencies, offices, and any other representative offices in the country and abroad according to the provisions of Art. 8 of the Charter. It shall settle correspondent offices and appoint correspondents.

- Issue statutes, rules, and working and operating conditions of branches abroad, and the salaries regime of their Argentine or foreign personnel, for which the legislation, the banking characteristics, and custom and practice of each country shall be taken into consideration.

- Establish the plan of acquisition and sale, under any system of ownership, of the premises necessary for real estate transactions or for the performance of the Bank, as well as for their building or repair, assigning them fully or partially to its use and disposing of the unused portion.

- Establish the regime of acquisition, repair, conservation and disposal of those properties guaranteeing the credits of the Bank.

- Establish for each fiscal year the amortization, write-offs, provisions, and allowances and fix the amounts to be assigned in order to increase the capital, and for such other purposes as set forth under Art. 5 of the Charter.

- Approve the annual Balance Sheet, the Statement of Income and the Annual Report of the Bank, all of which shall be submitted to the National Executive Branch for acknowledgment and publishing in accordance with Art. 6 of the Charter.

- Appoint the General Manager, Deputy General Managers, and Departmental Managers of the Bank, as proposed by the President.

- Approve the engagement of temporary personnel for the rendering or performance of services and, only occasionally, for executive or advice tasks.

- Discharge from services or exonerate officers and employees of the Bank. It shall issue the Bank's Personnel Regulations, ruling their admission, permanence, salary, promotion, social and welfare services, training, disciplinary system, leave, incompatibility, and removal.

- Appoint every year the Second Vice President among the Directors, who shall replace the President or Vice President, as applicable.

- Appoint the Directors, Statutory Auditors, Trustees, or Auditors in the companies or syndicates in which it takes part.

The foregoing does not prevent the performance of any other act related to the purposes of the Institution and the better fulfillment of its goals.

According to BCRA Communication "A" 5201:

The Board of Directors shall:

- Evaluate, on an annual basis, based on these minimum guidelines, if the Corporate Governance Code implemented by the financial institution, or as applicable, its economic group, is suitable for its profile, complexity, and importance, recording such evaluation.

- Monitor the Institution's risk profile.

- Avoid conflicts of interest, including potential ones, in relation to the Institution's activities and commitments.

- Refrain from making decisions where a conflict of interest prevents it from performing properly and objectively its duties.

- Invest time and dedication to fulfil its responsibilities.
- Promote training and development of executives and establish ongoing training programs for its members and Senior Management, maintain an appropriate level of knowledge and experience as the Institution grows in size and complexity.
- Conduct a self-assessment of its performance as a body, and of each of its members, specifying the applicable procedure and/or methods.
- Select and, where necessary, replace senior executives, and have an appropriate succession plan in place to ensure that candidates meet the necessary requirements to manage the Institution.
- Establish performance standards for Senior Management that are consistent with the Institution's objectives and strategies.
- Oversee the Institution's Senior Management, exercising authority to obtain sufficient information in a timely and appropriate manner to assess their performance.
- Meet, on a regular basis, with Senior Management to review the policies, establish communication channels and monitor compliance with corporate purposes.
- Meet, on a regular basis, with internal auditors to review the results arising from internal controls.
- Encourage the proper functioning of the financial institution, understand the regulatory framework, and ensure an effective relationship with regulators.
- Exercise due diligence in the hiring and monitoring process related to the external audit tasks, upon opinion of the Audit Committee.
- Ensure that Senior Management conducts appropriate and regular monitoring of policies.
- Approve, control, and review the design and functioning of the remuneration system of all the staff of the institution and if applicable, economic incentives to personnel, according to applicable regulations, ensuring compliance therewith.
- Acknowledge corporate governance policy of subsidiaries.

3.4.2 Independence

It is considered good practice for the number of members and the composition of the Board of Directors to be such that it enables independent judgement to be exercised when making decisions, as regards management and inappropriate external interests' points of view.

Independence and objectivity can be strengthened by including independent and qualified directors, with the purpose of preventing conflicts of interest and avoiding the adoption of decisions against the institution's best interests. For those purposes, the integrity of financial and non-financial information, transactions with related parties –in accordance with the relevant regulations in force– and the appointment and remuneration of senior executives shall be monitored.

In the case of entities where members of the Board of Directors also hold executive positions, the Institution shall take the necessary measures to minimize any risks that may arise.

For the purposes of these provisions, a member of the Board of Directors of a financial institution shall not be deemed to be independent where any of the following situations applies.

- There is a controlling relationship as set forth in paragraphs 1.1 and 1.2 of Annex I to Communication "A" 2140.
- They hold executive positions or have held such positions during the last three years, starting from the day following the last day on which they held that position. In the case of public financial institutions, this period shall be one year.
- They are the spouse or a relative up to the second degree of consanguinity or the first degree of affinity of any person falling within the abovementioned categories..

3.4.3 Responsibilities of the Board of Directors

According to BCRA Communication "A" 5201:

The Board of Directors shall establish and enforce clear responsibility throughout the Institution. For this purpose, the Board of Directors shall**:**

- Specify its own powers and responsibilities and clearly define and approve those of Senior Management.
- Oversee the performance of Senior Management and ensure adherence to defined policies, as part of the control system and balances, for adequate corporate governance.
- Monitor the transactions of its branches and controlled companies and ensure that management of these transactions complies with current policies and processes. Particularly, it shall oversee the quality of information provided by subsidiaries and branches and their compliance with internal controls.
- Take responsibility for activities delegated to third parties, which must comply with current regulations. For such purpose, it shall ensure that due diligence is performed in selecting the vendors, that a policy is established regarding the delegation of activities and the selection of vendors, preventing any harm to customers or compromise to the security of the institution's transactions; it shall ensure the implementation of contingency plans and that agreements are entered into with vendors clearly establishing the rights and responsibilities of the parties. Moreover, it shall also assess the risk involved in activities with one or a small number of vendors.
- Use the work performed by internal and external audits and the functions relating to the internal control system in an effective manner.
- Ensure that the Institution's remuneration policies and practices are consistent with its culture, long-term objectives, its strategy and control environment.
- Understand the Institution's operational structure.

According to BCRA Communication "A" 7724: :

The Board of Directors shall:

- establish and maintain coordinated governance members regarding authority and responsibilities to achieve the mission, goals and objectives of the Institution.

- approve and oversee organizational structures and high-level policies related to the information technology and security governance framework.

- monitor on an on-going basis the performance of information technology and security governance, to meet the established goals and objectives.

- drive and oversee strategic information technology and security projects.

- ensure that adequate resources are made available to areas related to information technology and security management.

- approve and oversee the risk management framework and the IT risk appetite.

- foster an IT and IS risk management environment across the Institution.

- promote the implementation of an information security management framework and monitor its effectiveness.

- approve the business continuity management framework and the mechanisms ensuring cyber resilience and oversee their performance.

- approve policies for managing relationships with third parties.

- approve policies for reporting significant cyber incidents to governmental agencies.

- approve policies for reporting incidents that compromise customer data.

According to BCRA Communication “A” 8249:

The Board of Directors shall:

- Approve the framework to be used for operational risk management, which shall be reviewed at least annually or whenever, in the institution’s discretion, significant events or situations relating to this risk arise; such events or situations must be brought to the attention of the Superintendence of Financial and Foreign Exchange Institutions (SEFyC).

- Have a clear understanding of the procedures developed for the purpose of managing operational risk and its level of compliance. For such purposes, it must receive, at least every six months, sufficient information to analyze the financial institution’s overall operational risk profile and verify the strategic and material impact on its activities.

- Ensure that the operational risk management framework is subject to an internal audit process (which area shall not be responsible for its management) which considers an adequate coverage and comprehensive reviews and the pertinent adoption of corrective measures by the audited areas.

- Approve policies for the dissemination of the operational risk management framework and for training, aimed at all areas and officers of the financial institution.

- Establish policies for the management of operational risks arising from outsourced activities.

- Approve a policy for disclosure to third parties of relevant information regarding the operational risk management framework. The content of such information and its characteristics shall be proportionate to the volume, complexity and risk profile of the financial institution's transactions.

- Ensure that the institution has technically qualified staff, as well as the necessary resources for operational risk management.
- Verify that those responsible for such management –the operational risk unit or the person in charge– do not perform other tasks in areas that could give rise to conflicts of interest.
- Approve and review regularly the definition of operational risk appetite and tolerance according to the nature, types and levels of operational risk that the financial institution is ready to undertake.
- Monitor regularly the effectiveness of information technology and security risk management to ensure confidentiality, integrity and availability of data and systems.
- Review and approve the financial institution's operational resilience approach, considering its risk appetite and tolerance for disruption of its critical transactions. When establishing the tolerance level, it must consider the institution's operational capabilities across a wide range of probable scenarios that could affect its critical transactions.
- Ensure that policies effectively consider situations where the financial institution's capabilities are insufficient as regards is tolerance level.
- Play an active role in ensuring a comprehensive understanding of the institution's operational resilience approach by clearly communicating its objectives to all relevant parties, including staff, third parties, and entities belonging to the economic group.

3.5 Senior Management

Management of the Bank is performed by the General Manager, assisted by a Managerial Committee composed of the Deputy General Managers. The General Manager and the Deputy General Managers shall be Argentine citizens, either native or by option, or naturalized, having exercised their citizenship for a minimum period of ten years, shall be persons of well-known competence in economics and banking, shall not be included in the provisions of incapacity mentioned in Article 13, and shall not have any other remunerated job, except for teaching activities.

The Board of Directors shall appoint the Deputy General Manager proposed by the President, who shall act as General Manager in case of absence, incapacity, or vacancy in the office (Charter Art. 19).

The General Manager and the Deputy General Managers are the immediate advisors to the President, Vice President, and Directors and, in such capacity, they attend the meetings of the Board of Directors, where applicable. The General Manager is responsible for the enforcement of the rules, regulations, and resolutions adopted by the Board of Directors, and may issue any internal regulations necessary to that end (Charter Art. 20).

3.5.1. Responsibilities of Senior Management

According to BCRA Communication “A” 5201:

In accordance with Communication “A” 5201, Senior Management, as a matter of good practice and, amongst other things, shall be responsible for::

- Ensuring that the institution's activities are consistent with its business strategy, the policies approved by the Board of Directors and the risks to be taken.

- Implementing the policies, procedures, processes and controls necessary to carefully manage transactions and risks, meet the strategic objectives set by the Board of Directors, and ensure that the Board receives relevant, complete and proper information enabling it to assess management and analyze whether the responsibilities it assigns are being effectively fulfilled.

- Monitoring managers in the various areas on a consistent basis in accordance with the policies and procedures established by the Board of Directors. One of the key roles of Senior Management will be to establish, under the guidance of the Board of Directors, an effective internal control system.

- Assigning responsibilities to the institution's staff while monitoring the exercise of those responsibilities and establishing a management structure that encourages accountability.

- Reporting to the Board of Directors on the results of its management of the institution.

- Using the work performed by internal and external audits and the functions relating to the internal control system in an effective manner.

- Understanding the institution's operational structure.

According to BCRA Communication "A" 7724:

In accordance with Communication "A" 7724, institutions must establish the responsibilities of Senior Management with regard to information technology and security. Senior management shall:

- Design information technology strategies and plans and define the budget required to implement them.

- Know and understand the risks associated with information technology and security; ensure that they are included in the established management programs; and define plans for mitigation of any risks detected.

- Design information security strategies, plans and measures, and define the budget required to implement them.

- Define and ensure the implementation and maintenance of high-level policies.

- Define the necessary roles and responsibilities for information technology and security processes in a coordinated and effective manner.

- Establish an information security management framework to ensure the identification, prevention, detection, response and recovery upon cyber incidents.

- Implement internal control and risk management practices and ensure that information technology decisions are taken in accordance with the institution's risk appetite.

- Outline a business continuity management framework, its associated documents and the resulting reports.

- Define and implement a framework for ongoing control and monitoring of processes, services, and/or activities delegated to third parties.

- Ensure the management of knowledge, skills and capabilities in line with the technologies used.
- Establish communication and coordination mechanisms among the risk management, information technology and security areas to ensure they meet their purposes.
- Ensure that the ‘secure by design’ principle is incorporated into information technology projects.
- Ensure that impact assessments are conducted and risk appetites are defined for the use of artificial intelligence.
- Approve communication protocols and responsibilities in the event of crisis and/or emergency scenarios.
- Ensure that requirements related to the protection of financial services’ users are considered in the relevant processes.
- Accept the residual risks arising from information technology and security risk management.

According to BCRA Communication “A” 8249:

Senior Management shall:

Será la responsable de la implementación, reporte y control de los procesos y procedimientos para la puesta en práctica y funcionamiento del marco de gestión aprobado por el Directorio de la entidad. Ese marco será aplicado en forma consistente en toda la entidad financiera, debiendo todos los niveles de la organización comprender sus responsabilidades con respecto a la administración de este riesgo.

- Be responsible for the implementation, reporting and monitoring of the processes and procedures for the implementation and operation of the management framework approved by the institution’s Board of Directors. This framework shall be applied throughout the financial institution, and all levels of the institution must understand their responsibilities regarding risk management.
- Ensure that processes and procedures are in place for each business unit, for managing the operational risk associated with the financial institution’s products, activities, processes, and systems.
- Establish clear reporting lines, responsibility and communication with the various management teams to promote and maintain accountability.
- Ensure that adequate resources are available to conduct effective operational risk management.
- Assess whether management oversight process is appropriate for the risks inherent in the policies of each business unit.
- Receive reports from the operational risk unit or the responsible person and, if applicable, from the functional level with decision-making authority in matters of risk management to which such unit or person reports, related to the results of the implementation of processes and procedures, the detection of any potential deficiencies in operational risk management policies, processes and procedures, and any relevant corrective measured proposed.
- Report to the Board of Directors, at least every six months, on the main aspects related to operational risk management.

- Regularly assess the design, implementation and effectiveness of information technology and security risk management.

- Ensure that the institution's change management process is comprehensive, has adequate resources and is properly coordinated among the pertinent lines of defense.

- Implement the institution's operational resilience approach and ensure that resources (financial, technical, etc.) are allocated appropriately to support such approach.

- Provide regular and timely reports on the operational resilience of the business units to support the Board's oversight, particularly in cases where significant deficiencies could affect the execution of the financial institution's critical operations.

3.5.2 Managerial Decisions

In accordance with best practice, key management decisions will be taken by more than one person. Senior Management:

- Should not become involved in decision-making on minor or detailed business matters.

- Should manage the various departments whilst considering the views of the committees responsible for those departments.

- Should exercise control over the activities of the most influential staff members, particularly when their performance exceeds reasonable expectations.

4. COMMISSIONS AND COMMITTEES

For the purposes of developing and complying with its obligations, the Board of Directors is organized in several Commissions and Committees, together with senior managers and the responsible administrative officers of the various areas of the functional structure of the Bank, for the analysis of the issues submitted thereto.

4.1 Board Commissions

Commissions review the different issues to be addressed by the Board of Directors, recommending measures to be taken for each of the issues submitted, upon proposal of the technical areas of the Bank. The Commissions are not in charge of solving the matters pertaining to the Board of Directors. All Board Resolutions should be adopted in plenary meetings.

The Bank has established the following Commissionss:

- ADMINISTRATION
- SYSTEMS, TECHNOLOGY, AND IT SERVICES
- PLANNING AND INTEGRAL RISK MANAGEMENT
- LEGAL AFFAIRS
- NETWORK OF BRANCHES AND OPERATIONS
- INDIVIDUAL BANKING
- BANKING FOR COMPANIES
- CREDIT POLICY
- INTERNATIONAL BANKING
- MARKETING AND INSTITUTIONAL COMMUNICATION
- CUSTOMERS
- CREDIT RISK AND COLLECTIONS MANAGEMENT
- HUMAN RESOURCES
- FINANCE
- GENERAL AUDIT
- BOARD OF DIRECTORS' AFFAIRS
- INTEGRITY AND COMPLIANCE.

When the creation of a Committee for addressing certain issues is required under BCRA regulations, the relevant Commission may assume such responsibility if so provided fora.

4.2 Committees of the Board of Directors

The Board of Directors establishes specific Committees for the treatment of certain issues, where applicable provisions or best practices so require:

- Information Technology, Systems and IT Services Governance
- Assessment of IT Services, Technology and System's Needs
- Integral Risk Management
- Financial Services User Protection
- Fraud Prevention
- Ethics
- Audit
- Environmental, Social and Governance Sustainability
- Protection of Information Assets
- Control and Prevention of Money Laundering, Financing of Terrorism and other illegal activities (CCP)
- Corporate Governance
- Institutional Coordination of Companies controlled by Banco de la Nación Argentina
- Asset and Liability Management (ALCO)

4.3 General Management and Senior Management Committee

As provided for in "Chapter VI – General Management", Articles 19 and 20 of BNA's Charter, management of the Bank shall be exercised through the General Manager assisted by a Managerial Committee made up by the Deputies General Managers.

Within this framework, and to strengthen the coordination, analysis and decision-making, General Management has the following Committees:

- General Management Committee
- Enhanced General Management Committee
- Incentives to Personnel Committee
- Disaster Recovery and Business Continuity Committee
- General Management Credit Committee

5. CORPORATE GOVERNANCE PRINCIPLES

5.1 Governance

For the purposes of implementing best practices as regards Corporate Governance, the Bank has taken various actions which contribute to the enhancement of Governance at the Institution. For such purpose, procedures and tools have been developed which help the Board of Directors and Top Management in the performance of their duties. Such actions seek to expand knowledge and necessary skills for decision-making purposes, adequate management of responsibilities and to act with loyalty and due diligence as regards the affairs of the Institution.

In such context, various initiatives are noteworthy such as self-assessment of performance of the Board of Directors, which tool helps identify and channel opportunities for improvement as regards Corporate Governance. Training Programs for the Board of Directors and Top Management are also noteworthy, which are designed based on specific surveys on training topics. It is also worth mentioning participation in UNDP "Activity No. 2: Modernization of Banco de la Nación Argentina: Integrity and Efficiency at the Service of Human Development", aimed at implementation of best practices as regards Corporate Governance. Together, these actions consolidate a comprehensive approach based on integrity, efficiency, and responsibility.

5.2 Transparency

BNA promotes transparency in all areas of management, as a key tool for democratization of access to information, as part of its integrity policy. For such purpose, it discloses in a clear, timely, and accessible manner all information that may be relevant to depositors, investors, customers, offerors, providers, users of financial services, and the public in general, seeking to promote market discipline and consolidating good Corporate Governance, based on openness and accountability.

5.2.1 Access to Information

In line with the Transparency principle under section 5.2 hereof, BNA, in its capacity as a reporting party under the terms of Law No. 27275 on the Right of Access to Public Information, guarantees access to relevant information for depositors, investors, customers, users of financial services, and the public in general.

In compliance with these obligations, the Bank disseminates, through its institutional website, relevant information that includes the conditions and commissions of its products corresponding to the Banking for Companies and Individual Banking segments, as well as the main institutional documents, including the Annual Report and Balance Sheet, the Code of Ethics and Conduct, the Corporate Governance Code, and the ESG Sustainability Report.

In addition, in relation to procurement and contracting, the Bank publishes the applicable regulations together with the corresponding general terms and conditions, as well as the information related to the scheduled biddings by item and the reports of recent acquisitions, including details on volume and pricing.

5.3 Integrity

BNA understands that best practices pertaining to Integrity and Corporate Governance strengthen management and control areas. In this regard, BNA makes sure to implement further and better mechanisms to strengthen ethics, transparency, and integrity in its business. Accordingly, the Bank implements standards, tools, and actions aimed at promoting ethical and responsible conduct at all levels of the organization.

5.3.1 Integrity Program

As a public institution playing a strategic role in the country's economic and social development, the Bank considers integrity as a key principle guiding both strategic decisions and daily business. In this sense, integrity becomes apparent through regulatory frameworks, corporate governance policies, prevention and control mechanisms, and institutional channels that strengthen reliability, legitimacy, and sustainability of management.

Based on these guidelines, BNA's Integrity Program is a key component of the institutional management model, which objective is to consolidate an organizational culture based on ethics, transparency, and accountability and it is integrated into the Bank's organizational structure, with defined functions and responsibilities, allowing institutional values to be consistently translated into policies, guidelines, and practices applicable throughout the organization.

In terms of its scope, the Integrity Program shall apply to both the operational units in the country and foreign branches. It shall subsequently apply to related companies, with the aim of consolidating a culture of integrity throughout the institutional network.

5.3.2 Training Plan on Integrity

Through regulations, anti-corruption policies, corporate governance practices, whistleblowing channels, and control mechanisms, the Integrity Program intends to translate institutional values into guidelines reflected both in formal definitions and in everyday practices.

By virtue of this, it promotes an organizational culture based on ethical values and the development of competencies at all levels of the organization, promoting upright behavior aligned with institutional commitments and the guidelines issued by the Anti-Corruption Authorities. Its approach is comprehensive, including content related to ethics, conflicts of interest, transparency, accountability, anti-corruption practices, applicable regulations, and risk management.

The ultimate objective is to promote the aforementioned principles among all members of the Bank, regardless of their hierarchy or function, ensuring their strategic, effective and continuous improvement in business and decision-making processes.

5.3.3 Affidavit of Integrity and Minimum Compliance Standards – Large Companies

The actions that promote integrity and transparency include the Affidavit of Integrity and Minimum Compliance Standards for the customer segment of Large Companies in order to gain knowledge on the value chain and integrity standards involved in the Bank's operations.

This tool enables the implementation of controls on customers in this segment, to gain knowledge on policies and procedures implemented by customers to prioritize ethics and integrity in their businesses and to identify whether they are involved in pending cases of fraud and/or corruption.

The execution of the Affidavit is mandatory at the time of applying for credit assistance, and it is provided that, if applicable, customers shall provide additional documentation required to BNA's satisfaction.

5.3.4 Conflict of Interest – Affidavit of Interest in Loan Transactions Involving Legal Persons

In line with the abovementioned measures to gain knowledge on the value chain and to prevent conflicts of interest, the Bank requires all customer Legal Persons to execute a form when applying for credit assistance.

This shall enable to identify whether certain members of the applicant institution are public officials of the National Executive Branch, namely, the Argentine President or Vice President, Chief of the Cabinet of Ministers or other ministers or officials.

This also aims at avoiding conflict of interest, ensuring similar business conditions and treatment to those established for the remainder of customers of the Institution.

5.4 Code of Ethics

The Bank has in place the Code of Ethics and Conduct, which main objective is to establish the values, principles, and guidelines of ethical behavior that should guide the conduct of all members of the Bank and to promote professional conduct in line with institutional standards.

Under this framework, all employees, regardless of their employment relationship, must act with integrity and honesty, avoid any situation that may give rise to a conflict of interest and have an impact on the impartiality required for the performance of their tasks, as well as report to the relevant authority on any act or procedure which may damage the Institution or constitute a criminal or administrative offense.

In addition, internal regulations are also established in the Bank's Personnel Regulations, wherein the duties, rights, and minimum guidelines for the implementation of disciplinary actions and the establishment of liabilities are listed.

5.4.1 Whistleblowing

In order to promote a culture of Integrity, Ethics and Transparency, the Bank has several channels to report any irregulariti:

- Through the corresponding hierarchical instances: In accordance with Article 13), paragraph (K) of the Personnel Regulations, members of personnel must report to higher instances, but may also report directly to the President, General Manager, or Auditor General, in writing or orally, any irregularities or acts or procedures that may cause damage to the Bank or may imply the commission of a crime.

- Internal/External Whistleblowing Channel – BNA's Ethical Line: Any situation contrary to the Code of Ethics may be reported, through BNA's Ethical Line, in a strictly confidential and independent manner, either anonymously or not.

5.4.2 Code of Ethics and Conduct for Vendors

Banco de la Nación Argentina's Code of Ethics and Conduct for Vendors establishes the minimum ethical, legal, social and environmental principles, values and standards that must be met by all suppliers of goods and services doing business with the Institution. It is aligned with the Bank's Code of Ethics and Conduct and is mandatory, without distinction of nationality, contractual modality or place, including authorized subcontractors and third parties.

Vendors shall adhere to this Code and comply with the requirements set forth in the Bank's Procurement and Contracting System, as well as with the internal and external regulations applicable throughout the life of the contractual relationship.

5.5 Reporting and Accountability

As the leading entity of the Argentine financial system, BNA considers sustainability as a key component of its management, aiming at responsible and sustainable development.

The Sustainability Policy establishes a comprehensive framework for the entire organization, serving as the basis for the implementation of programs, initiatives and processes with a positive impact on ethical, economic, social and environmental matters. It covers all areas of the Institution and contributes to strengthening the relationship with stakeholders, in line with the Corporate Social Responsibility and Sustainability Management Model. This model defines commitments and is structured around seven fundamental pillars: Integrity, Financial Inclusion, Regional Development, Human Rights, Value Chain, Sustainable Finance, and Environmental Management.

In this context, the Sustainability Report is a key tool to strengthen institutional integrity and accountability, by clearly communicating the Bank's main initiatives, progress and results in terms of sustainability, as well as any commitments undertaken and future challenges identified.

6. COMPLIANCE AND INTERNAL CONTROL

6.1 Compliance

As regards regulatory compliance, BNA has implemented different mechanisms, processes, and controls to ensure compliance with the regulatory framework, applicable laws and standards, as well as internal standards, codes, and policies to which the Institution is subject. This enables systematic and ongoing monitoring of compliance, identification and reporting, as soon as possible, of any deviations to the relevant managerial level and informing the Board of Directors where necessary.

The Bank's internal controls are commensurate with the size and complexity of its activities and structure and include clear rules regarding the assignment of powers and responsibilities and segregation of duties. It also provides for independency and coordination among the Internal Audit and Compliance units, thus allowing to verify the efficiency of controls in place as well as compliance with applicable laws and regulations, and strengthening transparency, integrity, and sound corporate governance.

6.2 Internal Control

BNA acknowledges internal control as defined by the Central Bank of the Republic of Argentina in its "Minimum Internal Control Standards", designed to provide reasonable assurance regarding the achievement of institutional objectives. It also follows the Control Framework pertaining to the COSO Report (Committee of Sponsoring Organizations of the Treadway Commission) to define and establish internal control aspects and ensure reliability as regards the achievement of said objectives.

In this context, the Bank's internal control system is based on a set of interrelated components: first, the control environment serves as the basis of the system and involves the Institution's ethical values, organizational culture, management and risk appetite, as well as the established control activities, directly influencing the expected behavior of the personnel.

Second, risk assessment and control activities, including the identification and analysis of relevant risks, as well as the implementation of policies and procedures aimed at mitigating them and ensuring compliance with institutional objectives.

Third, information and communication are based on information systems that use internal and external data, which contents and timing must be adequate, so the members of personnel may effectively perform their duties.

Finally, the Institution oversees and monitors the components of its internal control system.

7. INTEGRAL RISK MANAGEMENT

In order to strengthen continuous improvement in risk management, BNA establishes policies and procedures aligned with international best practices, assigning resources and responsibilities in line with the risk appetite defined by the Board of Directors. Risk Management covers all areas of the Organization, including the Head Office Units, Zonal Managements, Domestic and Foreign Branches, as well as the Annexes. Also, companies pertaining to BNA Group shall develop their own Integral Risk Management framework, aligned with the principles, policies, and guidelines defined by Head Office.

“Integral Risk Management” is understood as the process by which the Bank identifies, measures, monitors, mitigates, and reports on the different types of risks to which it is exposed, considering the size, nature, and complexity of its operations, products, and services, following the guidelines and provisions of the Central Bank of the Republic of Argentina.

The Integral Risk Management Committee (hereinafter, IRMC) is in charge of making the decisions concerning the significant risks to which BNA is exposed, ensuring that risk management policies, practices, and procedures are appropriate in terms of its risk profile and its business and action plans, and that such decisions are effectively implemented in compliance with the provisions of the Central Bank of the Republic of Argentina, promoting development and formal implementation of best practices on the matter. For the purposes of complying with the objectives of the IRMC, the Planning and Integral Risk Management Unit is in charge of managing the risks to which the Bank is exposed, as a whole. The principles in which it is based relate to the independence of functions of the business and support units which manage and control risks inherent in the activities of the processes in which they are involved, from those areas assessing and monitoring risk exposure. Moreover, Management issues the corporate risk management standards and guidelines for standardization of activities conducted in such regard at Foreign Branches and Controlled Companies. Although these are autonomous as regards the development and execution of their action plans for management of their main risks, such plans shall follow the guidelines for integral risk management of the Bank and industry standards.

This approach is accompanied by strong commitment from all governing bodies of the Bank, strengthening independent management, and it is incorporated into business decisions and aimed at optimizing the risk profile by using updated tools and systems for detection, measuring, monitoring, and mitigation of each of the risks to which the Institution is exposed.

The Integral Risk Management model is based on “Overall Framework for Integral Risk Management – Policy and Strategy” and on policies for management of each specific risk, providing support to management structure and promoting corporate culture for addressing all significant risks to which the Institution is exposed.

Integral Risk Management activities are based on three pillars and two internal control measures which ensure the implementation of management:

1. Disclosure and Training covering, inter alia, the reports prepared by the Planning and Integral Risk Management Unit, training processes, publication of articles, websites, notes and material for employees, customers, controlling bodies, and the public in general.

2. Qualitative Risk Management involving the following activities: subjective self-assessment of risks, studies of correlation of different risks, and determination of risk matrixes and indicators.

3. Quantitative Risk Management covering the development of models, sensitivity analysis of variables and stress tests (severely adverse but possible scenarios) for the purposes of assessing the financial

position and condition of the Institution regarding its ability to absorb expected and unexpected impact.

Internal control measures which ensure the implementation of management:

1. Monitoring and control: follow-up of risk exposure and evolution of indicators in order to suggest any changes in view of the actual nature of business.

2. Audit: including review of implementation and effectiveness of the integral risk management framewors.

7.1 Information Security

The Bank is aware of the importance of identifying and protecting its information assets, laying the foundations for minimizing exposure, and committing to continuously developing, establishing, maintaining, and improving the Information Security Management System (ISMS), in line with international standards and BCRA's regulations.

In this regard, BNA has an Information Security Policy approved by the Board of Directors, subscribed by all employees, and applicable to all processes related to the Institution, whether internal or external. The purpose of this policy is to ensure integrity, confidentiality, availability, and auditability of information and to implement a reasonable level of protection of the Bank's assets.

For this purpose, awareness-raising and training actions are taken on information security on an ongoing basis, covering both employees and customers of the Bank. These Policies support the Information Security Management System (ISMS) that allows the processes involved to be maintained in a cycle of continuous improvement.

In this context, the Bank has in place a security strategy including a set of tools, processes and human resources devoted to implementing a program for protection of information assets in line with business objectives; monitoring, preventing, and handling cyber-incidents in agreement with the current global context.

Since customer information is of vital significance for business, BNA complies with the requirements under Law No. 25326 on Personal Data Protection as the party responsible for handling data.

7.2 Fraud Prevention

In a context of increasing digitalization of financial services and permanent evolution of criminal practices, Banco de la Nación Argentina considers fraud prevention as a key component of its internal control system and integral management. Within this framework, it focuses on the protection of institutional assets, the security of operations, and the safeguarding of the trust of its customers, by adopting a comprehensive approach based on prevention, detection, and mitigation of external fraud events associated with its products and channels. To this end, it promotes the incorporation of controls such as design of processes, analysis of customer behavior patterns, and implementation of measures for preparedness for potential impact, thus strengthening is capacity to respond to these types of events.

Management is integrated into the Bank's internal control system, in coordination with risk management, regulatory compliance, and information security functions, which allows for the consolidation of an approach throughout the organization. In this regard, the Fraud Prevention Committee is the coordinating and supervisory body on this matter, which implements actions related to the prevention and management of fraud events, as well as coordinating the intervention of the competent areas in the definition and implementation of the applicable guidelines. This helps ensure traceability of decisions and consistency of the actions taken.

Within this framework, the Bank develops and maintains a comprehensive fraud prevention system that includes the definition of criteria for taking action, management and analysis of relevant information, the use of internal and sectoral sources, as well as the application of tools aimed at early identification of any unusual circumstances.

This approach makes it possible to evaluate profiles and adopt appropriate controls based on the level of exposure detected, thus contributing to the mitigation of operational, economic, and reputational impact.

The Bank implements controls throughout the entire customer life cycle, including the verification of information during onboarding, the monitoring of operations performed through the different channels, the identification of unusual behavior and the application of preventive or corrective measures, as appropriate. In particular, controls in digital channels are continuously reinforced through the incorporation of security tools, thus not only optimizing early detection of fraud events, but also reducing their impact on operations and customers.

In addition, in compliance with applicable regulations, the Institution implements specific mechanisms for identification and management of improper use of accounts. These mechanisms include controls related to the multiplicity of accounts in the financial system, the evaluation of profiles, as well as the adoption of preventive measures on unusual operations, which allows adapting controls according to the circumstances detected, in line with applicable regulatory provisions.

Fraud prevention management is based on systematic monitoring of management indicators, which allow the assessment of events, to alert any deviations and to measure the effectiveness of the controls implemented. In this regard, the Bank periodically monitors variables such as volume, associated amounts, the number of customers affected, as well as responsiveness. As a result of the measures adopted, improvement in the indicators is observed, thus reflecting the positive impact of the controls implemented and the consolidation of the management model.

In addition, the Institution promotes initiatives aimed at strengthening controls and continuous improvement of its processes. These include projects related to channel security, management tools, as well as the incorporation of specialized technological solutions. These initiatives contribute to consolidating a more robust prevention ecosystem, aligned with the Bank's digital transformation and with the best practices in the financial system.

Banco de la Nación Argentina promotes an organizational culture aimed at fraud prevention through training and awareness actions targeted to both staff and customers, with the aim of strengthening early detection and reducing risk exposure, contributing to the protection of users and safe use of financial services. Each agent of Banco de la Nación Argentina shall act diligently and remain alert to any indication of fraud within the scope of their functions and that may result in damage to the Institution or its customers. In this sense, proactive behavior is expected, for early identification, timely reporting, and cooperation in the prevention of these types of events, in accordance with current internal procedures and guidelines.

Mitigating measures adopted within the framework of fraud management are based on reasonableness and proportionality, and the risk analysis conducted. They are implemented in compliance with the current regulatory framework, seeking to protect the institutional assets and the rights of customers, ensuring adequate substantiation and review of the decisions adopted.

7.3 Anti-Money Laundering and Terrorist Financing and Proliferation Of Weapons Of Mass Destruction

In compliance with regulations applicable in each jurisdiction where it operates, the Financial Action Task Force (FATF) standards, and corporate policies established by its Head Office, BNA is committed to preventing and fighting against Money Laundering and Terrorist Financing and Proliferation of Weapons of Mass Destruction (AML/CFT/WMD). Such institutional policy aims at implementing efficient measures to ensure that its financial products and services are not used for illegal purposes.

In its capacity as reporting party before local regulators, BNA has implemented an AML/CFT/WMD system under a risk-based approach, including all policies, procedures, and controls for effectively identifying, assessing, monitoring, managing, and mitigating risks associated with: (i) Customers, (ii) Products and/or Services, (iii) Distribution Channels, and (iv) Geographical Areas. For designing and updating such System, Risk Assessments on Money Laundering, Financing of Terrorism and the Proliferation of Weapons of Mass Destruction, their reviews and other documents issued by competent authorities are covered, as well as any specific risks identified by the

Bank itself.

In such context, the Board of Directors of the Bank has appointed a Compliance Officer, whose role is to ensure compliance with and implementation of the procedures and obligations set forth by laws and regulations in force on control and prevention of money laundering and terrorist financing and proliferation of weapons of mass destruction. The Compliance Officer delegates operational tasks inherent in their position to the Anti-Money Laundering Unit (AMLU), which area is specialized in implementation of policies and procedures on this matter.

In addition, the Bank has a Committee for the Control and Prevention of Money Laundering, Financing of Terrorism, and other Illegal Activities in place, which is in charge of assisting the Compliance Officer of the Institution in designing and implementing the strategies for Control and Prevention of Money Laundering, Financing of Terrorism, and other Illegal Activities, in accordance with legal and administrative rules in force.

Regarding foreign branches, the AMLU works together with their Compliance Officers, by applying standards in accordance with the principle of stricter regulatory standards established under Resolution UIF 14/2023, Art. 15.

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8. SUPERVISION. INTERNAL AND EXTERNAL AUDITS

8.1 Supervision

The observance by the Bank of the provisions of this Charter and other applicable laws, decrees, resolutions, and provisions shall be supervised by a Statutory Auditor appointed by the National Executive Branch. The Statutory Auditor shall be a lawyer, PhD in Economics or a Certified Public Accountant, and shall meet the other conditions required for Directors. The Statutory Auditor shall remain two years in office and may be reappointed. (Charter Art. 21°).

Should the Statutory Auditor die, resign, or become disabled, or otherwise leave the position vacant, another person shall be appointed in order to complete the corresponding term. (Charter Art. 21°).

The duties of the Statutory Auditor are as follows (Charter Art. 22°):

- To make the cash counts, controls, inspections, and verifications as deemed necessary in connection with operating, accounting, budgetary, and administrative matters, in order to verify that the Bank's actions and provisions comply with relevant legal and regulatory provisions; to sign the Balance Sheet and Statement of Income as of year-end.

- To attend the meetings of the Board of Directors and express their opinion without the right to vote.

- To call a meeting of the Board of Directors whenever necessary for discussion of matters connected with the performance of their duties.

- To inform the Board of Directors and the National Executive Branch, through the Ministry of Economy, on performance of the Institution. In exercising their duties, the Statutory Auditor shall be subject to the liabilities set forth under the National laws applicable to this position.

The officers of the Bank shall facilitate the work of the Statutory Auditor by furnishing all the necessary means and information. (Charter Art. 23°).

The provisions of the Accounting Law are only applicable to the Bank as regards the supervision of expenses falling within the scope of its administrative budget through the rendering of accounts in writing, which shall be submitted on an annual basis to the National Government Accounting Office, as provided for under Law No. 24156. (Charter Art. 21°).

8.2 Audits

8.2.1 Internal Audit

The Internal Audit process at BNA is performed by the Deputy General Management of General Audit, reporting to the President/Board of Directors of Banco de la Nación Argentina, which main duty is to conduct the assessment and monitoring of internal control of the Institution and the controlled companies, with the exception of insurance companies, which have their own Internal Audit Managements that report to their respective Board of Directors and Audit Committees, promoting the enhancement of the audited processes.

Within this framework, the Internal Audit Unit provides independent and objective assurance and consultation services aimed at optimizing the operations of the Bank and the companies within its scope of review, and contributes to the achievement of the objectives set by the Bank's Board of Directors and by the management areas of BNA Group companies by applying a systematic and disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and corporate governance processes.

The scope of the Internal Audit function includes evaluating the effectiveness, adequacy, and operation of the internal control system applied to the processes under review, ensuring that risks are properly identified and managed; that there is interaction with the various governing bodies; important financial, administrative, and operational information is accurate, reliable, and timely; that the staff complies with applicable policies, rules, procedures, regulations, and laws; that resources are used efficiently and are adequately protected; that established programs, plans, and objectives are met; that quality and continuous improvement in the control process are promoted; and that legal or regulatory issues that impact the organization and BNA Group Companies are recognized and addressed properly.

The Internal Audit activity follows the Annual Audit Plan, prepared in accordance with the provisions set forth in BCRA's Minimum Internal Control Standards and considering SIGEN General Internal Control Standards (Resolution 172/14-SGN) and the Governance Internal Control Manual issued by such body (Resolution 03/2011-SGN) and applicable laws, decrees, regulations, and provisions, as well as those established by regulators of foreign branches. Moreover, SIGEN requirements set forth by Law No. 24156 on "Financial Administration and Controlling Systems of the Public Sector" and Resolution 175/18-SGN providing for the obligation to submit the Annual Work Plan to such body for approval are complied with.

Since 2011, the Internal Audit area has had its Regulations and Code of Ethics (updated in 2025, 2024, and 2022, respectively), pursuant to The Global Standards for the Professional Practice of Internal Auditing of the Institute of Internal Auditors (IIA) headquartered in USA. This Code includes a series of Relevant Principles and Rules of Conduct for internal auditing, in line with the guidelines issued by BCRA.

In addition, it has obtained a certification since 2011, pursuant to the International Standards for the Professional Practice of Internal Auditing, granted by the Institute of Internal Auditors of Argentina (recertified in 2016 and 2023) and pursuant to the International Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors (IIA).

It has obtained the Quality certification since 2014 as per Reference IRAM No. 13 "Requirements for Management of Quality of Internal Audit Units of Public Sector" issued jointly by IRAM / SIGEN (recertified in 2017, 2021, and 2024). The latest follow-up was conducted during 2026 with favorable results. Such practices provide a framework to conduct and promote a wide range of internal audit activities, establishing the basis for the evaluation of their performance and promoting continuous improvement in the organization's processes and operations.

8.2.2 External Audit

In compliance with the regulations provided in the "Minimum Standards for External Audits" issued by BCRA, BNA engages external auditors, pertaining to major companies well-known in the market in order to review its financial statements and other information required by the controlling body.

BNA, pursuant to Law No. 24156 of "Financial Administration and Control Systems of the National Public Sector" is audited by Auditoría General de la Nación (the General Audit of the Nation) (hereinafter, AGN), as an external controlling body of the National Public Sector, which reports to the National Congress.

External auditors, together with AGN, perform the review of the Bank's financial statements. To preserve the auditor's independence, BNA oversees compliance with regulatory and ethical issues when hiring them, ensuring such criteria for the whole engagement period. For this purpose, it ensures that the auditor does not engage services considered inconsistent by BCRA or contrary to BNA's concept of professional ethics.

Furthermore, external auditors are hired for each of BNA's foreign Branches and Agencies, following the financial standards and regulations of each country.

8.3 Independence

To ensure independence of the Internal Audit, the Deputy General Management of General Audit performs its duties reporting to the President and the Board of Directors of Banco de la Nación Argentina.

As regards External Audits, to ensure objectivity, independence and transparency, BNA has the "Guidelines for the Mandatory Rotation of External Audit Firms for Financial Statements" (approved by Board Resolution in 2011) requiring the mandatory audit firm rotation after a maximum term of 6 (six) fiscal years. Therefore, the Audit firm shall be hired for up to 3 (three) consecutive fiscal years with the possibility of extension for 3 (three) additional fiscal years.

Accordingly, the External Audit firm, having completed the term for the rendering of services, shall not be hired during the subsequent period. The foregoing also applies to any joint venture to which the firm or its partners are a party.

Pursuant to the provisions established by BCRA in the Minimum Internal Control Standards for Financial Institutions, the external audit shall be performed by appointed Certified Public Accountants who are registered with the "Auditors Registry" pertaining to the Superintendence of Financial and Exchange Institutions. Such professionals shall perform duties for up to five (5) consecutive fiscal years, and, upon completion of such term, these auditors shall not be reappointed for the subsequent term until two (2) consecutive fiscal years have elapsed.

8.4 Access to Information

The Board of Directors, through the Audit Committee, ensures that both internal audit and external audit functions have unrestricted access to all sectors and to all information of the Institution.

9. ROLE AS A FINANCIAL AGENT FOR THE NATIONAL GOVERNMENT

Banco de la Nación Argentina, in its capacity as a financial agent for the national government, as well as of those provinces, municipalities, and districts where it has been designated as such, plays a key role in the provision of banking and financial services. This also includes the agencies, bodies, and entities of the non-financial public sector within those jurisdictions.

Within this framework, the Institution administers official accounts and public funds, safeguarding and managing them by processing payments, collections, transfers, and revenue associated with the operations of the national, provincial, municipal, and local governments within its jurisdiction, thereby contributing to management of public resources and compliance with economic and financial policies.

Furthermore, the Bank may provide credit assistance to these jurisdictions to finance projects, programs, or temporary liquidity needs for the payment of wages and pensions, in accordance with applicable regulations and current policies.

Similarly, it may participate in the establishment and administration of public trusts and other financial mechanisms designed to implement public programs and policies in those jurisdictions.

Through these functions, the Bank acts as a financial intermediary in the areas where it acts as agent, contributing to management of public resources and the implementation of economic and financial policies.

10. ECONOMIC INCENTIVES TO PERSONNEL

In 2005, the Bank implemented the Encouragement and Motivation Program for the Network of Branches, Zonal Managements, Plaza de Mayo Branch, and Head Office. Guidelines on incentive programs for personnel aim at fostering higher productivity of staff, based on the achievement of strategic and commercial goals and management indicators previously stated, the control environment, the sustainability of business, and prudent risk-taking. It applies to all members of staff of the Institution, except for personnel engaged for the Security Area, Advisors to the President and/or the Board of Directors, and Argentine personnel stationed abroad. These programs are an integral part of risk management and Corporate Governance at the Institution ("Guidelines for Corporate Governance in Financial Institutions", BCRA Communication "A" 5201, as amended and supplemented) and are progressively tailored and perfected, in accordance with experience gained, in order to obtain better results for the Institution. The same criteria are implemented in measuring the different Business Units, making no distinctions as regards areas or employees.

The Board of Directors pays special attention to the design and implementation of the Encouragement and Motivation Program. It monitors and reviews such Program to ensure that it is operating as intended and that it complies with approved policies and procedures. Considering the need to supplement the current program with tools that help improve efficiency, in line with the Bank's business objectives, mechanisms are added for recognizing individual productivity, in order to promote utmost efficiency. In addition, the Operating Regulations of the Incentives to Personnel Committee are in place.

In addition to the tools mentioned above, this institution has implemented a special attendance bonus, which is a form of compensation, with the aim of promoting a greater sense of responsibility and commitment among staff regarding absenteeism.

Banco de la
Nación Argentina