POLICY

1. Policy Name
Anticorruption Policies.

2. Scope:
All people who work or provide services at any of the companies that are a part of Grupo Financiero Banorte (GFNorte).

3. Contents:

1. <u>Definition of corruption:</u>

A. For purposes of this policy, corruption shall mean, among other things:

1. Bribery (inappropriate payment – in cash or in kind) to public officers / officials of private companies and individuals, directly or through third parties.

2. Influence peddling by any person that promotes illegal conduct by any public official.

3. Concealment of criminal offenses or reportable conduct, including, among other actions, aiding or assisting the perpetrator of an offense, concealing or facilitating the concealment of the person responsible for an offense or its proceeds, objects, or instruments, or obstructing its investigation.

4. Participation of an officer or employee that contravenes institutional regulations in exchange for a benefit in cash or in kind.

5. Fraud through the improper use of financial, technological, material, or human resources for the purpose of obtaining economic or other benefits, regardless of whether a potential benefit to GFNorte could be generated.

6. Voluntary use of false information to obtain authorizations, benefits, advantages, or to harm any third parties, including the forgery and alteration of documents.

7. Collusion in hirings or arrangements with competitors or clients.

8. Hiring by GFNorte of former public officials without complying with the applicable Law requirements.

9. Allowing the laundering of Funds of Illegal Origin either actively or by omission or failure to comply with the applicable regulations.

10. False or inadequate accounting records, as well as unrecorded assets or expenses.

2. <u>Principles of the Anticorruption Policy:</u>

A. General:

1. The Anticorruption Policy is an integral part of GFNorte's Internal Control System.

2. GFNorte's Management shall implement, keep, disseminate and provide the financial and human

resources to comply with the particular policies contemplated by the Anticorruption Policy.

B. Objectives:

1. Keeping consistency between the different policies and actions followed by the Financial Group to prevent acts of corruption in the conduction and execution of business and operations of the Financial Entities that are a part of GFNorte.

2. Ensure that the different related policies are revised and updated on a permanent basis.

3. See that the mechanisms for coordination and communication between business and control areas, as well as Corporate Governance bodies work appropriately and are being duly informed if any acts of corruption are detected.

4. Verify that the possible identified corruption cases are thoroughly investigated, and corrective measures are taken in processes that fail, and that the involved officers and employees are penalized.

5. Establish the terms and conditions to prevent acts of corruption, considering their probability of materialization or potential impact.

6. Implementing on a permanent basis action that ensures the promotion, encouragement and dissemination of a culture of integrity, as well as ethical behavior by GFNorte's personnel.

7. Encourage the existence of mechanisms to validate compliance with the Anticorruption Policy through the functions corresponding to the Control and Internal Audit areas.

3. <u>Elements of the Anticorruption Policy: Without limitation, the Anticorruption Policy contemplates the following:</u>

A. GFNorte personnel are strictly prohibited from:

1. **Human Resources:**

a. Paying, offering to pay, or authorizing the payment, directly or indirectly, of anything of value for the purpose of obtaining, securing, or retaining business, or obtaining an improper business advantage.

b. Accepting bribes from job candidates for the purpose of giving preferential consideration to their résumé or ensuring that it is presented to the head of the area in which the vacancy is located.

c. Recruiting individuals with a poor public reputation or whose hiring is intended to obtain an improper business advantage.

2. **Material Resources:**

a. Using assets owned by GFNorte for purposes other than those for which they were acquired, for the benefit of oneself or a third party.

3. **Use of information:**

a. Using confidential information accessed in the course of performing assigned duties for personal

benefit and to the detriment of third parties.

b. Removing, destroying, concealing, or improperly using any documents or information entrusted to their care or custody by virtue of their position or in the performance of their duties.

c. Using or generating false information in administrative procedures, including the falsification or alteration of documents, for the purpose of obtaining approval for the granting of credit, increasing customer deposits, or facilitating the contracting of products or services offered to customers by GFNorte companies.

4. **Donations:**

a. In accordance with the Internal Control Objectives and Guidelines, all donations must obtain the approvals required under applicable regulations and must under no circumstances be intended to facilitate an act of corruption or be used to finance or support organizations or candidates for elected office, whether affiliated with a political party or running as independents. All donations must be properly recorded in the accounting records and appropriately monitored to ensure that they are used for the purpose for which they were authorized.

5. **Business:**

a. In the performance of business, notwithstanding what segment, it is indispensable for the plaintiff representing GFNorte to always seek conditions that favor the Group's interests, and it is forbidden to offer or receive any monetary funds or something valuable to obtain or retain them.

b. In certain business activities, GFNorte is required to interact directly with government officials. In this regard, making or offering any payment or compensation, whether in cash or in kind, to such officials for the purpose of obtaining, securing, or retaining business, directing business to any person, or obtaining an improper business advantage is prohibited, except for minor payments made to government employees for the purpose of expediting, but not circumventing, certain routine procedures, such as the issuance of official documents required for the Institution's business activities, the provision of protection by law enforcement authorities, among others.

(i) Routine procedures do not include acts in which the officers have the power to decide the assignment of a business or its continuity, or to influence other people to encourage them to perform such actions.

(ii) These procedures must be duly approved and recorded in accordance with the internal mechanisms and controls defined in the regulations (see central expense policy).

c.Conducting transactions or engaging in business with individuals or legal entities located in countries or jurisdictions with lax tax regimes, weak Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) measures, or that are included on sanctions lists issued by the relevant Authorities is prohibited.

d.The Group's employees, regardless of their functions, whether they involve the contracting of suppliers of goods and services, the placement of products or services or any activity involving third parties, must refrain from promoting GFNorte's participation in tenders, bids or businesses in which there are indications of corruption. In the event that employees become aware of an event that falls under this assumption, they must report it through the whistleblower system and the electronic channels established in the Institution.

6. **Bribery:**

a. It is the responsibility of all employees and officers in the performance of the activities entrusted upon

them to refrain from receiving or giving any gift, either in cash, favors, or in kind, intended to derive any benefit in exchange.

b. The receipt of gifts or their delivery is forbidden, unless the same is done pursuant to the provisions of the Code of Conduct.

c. Courtesies, meals and gifts: Under no circumstances may courtesies, meals and gifts granted to public officials or private individuals exceed the provisions of internal policies, and their granting must be analyzed to ensure that their frequency and timing are linked to the legitimate pursuit of the business.

7. **Influence Peddling:**
a. It is strictly forbidden to use influence through interpersonal relationships in order to obtain any favors or preferential treatment, to the prejudice of third parties.

8. **Accounting Record:**
The following strictly prohibited:

a. Omitting to record information on each and every payment made, keeping the details of the transactions, including at least the amount paid, the beneficiary or recipient of the payment and the concept of the payment.

b. Taking any action that results in the concealment of accounting records of expenditures related to potential acts of corruption or bribery.

9. Courtesies, meals and gifts: Under no circumstances may courtesies, meals and gifts granted to public officials or individuals exceed the provisions of internal policies, and their granting must be analyzed to ensure that their frequency and timing are linked to the legitimate pursuit of the business.

B. Prevention, Monitoring and Surveillance.

1. **Structure, Recruitment and Selection of Personnel, Contracting and Training of Human Resources:**

a. Organizational Structure: The organizational structure shall always correspond to the institutional mission, vision and objectives, and its design must encourage the appropriate separation of functions, particularly in processes that may be impacted by corruption.

b. Personnel Recruitment and Selection: The General Direction of Administration is responsible for developing and implementing training programs for GFNorte's personnel related to the Anti-Corruption Policy, contemplating situations of conduct considered inappropriate, and the consequences derived therefrom.

c. Personnel Hiring: In the personnel hiring process, it is the responsibility of the General Directorate of Administration to manage the necessary actions to apply the psychometric and integrity tests applicable to each position.

d. Training: The General Direction of Administration is responsible for developing and implementing training programs for GFNorte's personnel related to the Anti-Corruption Policy, contemplating situations of conduct considered inappropriate, and the consequences derived therefrom.

2. **Reporting acts of corruption:**

a. In accordance with the Code of Conduct and the Internal Control Objectives and Guidelines, GFNorte's Board Members, Officers, or Employees who become directly or indirectly aware of any act of corruption, reportable conduct, conflict of interest, or regulatory non-compliance that may cause or result in financial loss to GFNorte or its customers, or that constitutes a breach of any of the principles set forth in the current Code of Conduct, must report such matter to the Deputy General Directorate of Internal Control and/or the Special Affairs and Claims Audit Department, or through the Institution's reporting system and established electronic channels.

3. **Compliance with Code of Conduct:**

a. The directors, senior officers and employees, when becoming a part of GFNorte, shall know the Code of Conduct and commit themselves to acting in accordance with the guidelines.

b. With the annual ratification of the Code of Conduct, the personnel of GFNorte renews its commitment to direct its performance in the business environment and in its relationships with clients, suppliers, authorities and fellow employees according to the guidelines of this Policy.

4. **Material Resources**

a. The assignment of economic resources for the acquisition of goods and services must be made based on the budget authorized by the Board of Directors.

b. The General Administration Division, through the Deputy General Directorate of Material Resources, is responsible for ensuring compliance with the controls established for disbursement requests and for verifying that such requests are not intended for any improper purpose under this Policy.

c. In the management of material resources, the following cases shall be considered as acts of corruption, and shall be reported by the established Accusation channels, when detected:

(i) Use of assets owned by GFNorte for any purposes different than those for which they were acquired, to their own benefit or the benefit of a third party.

(ii) Prioritize the contracting of a supplier in exchange for any economic benefit, even when it has the qualities that make it appropriate for the provision of the good or service subject matter of the negotiation.

(iii) Bribery (inappropriate payments – in cash or in kind) to public officials / private companies and persons, directly or through third parties, or resorting to influence peddling for the conclusion of a negotiation or agreement, or to obtain the permit from any authorities.

(iv) Colluding or making arrangements with competitors, clients or suppliers.

d. Considering the nature of the goods or services to be procured, the Deputy General Directorate of Material Resources and the Deputy General Directorate of Internal Control must determine whether the agreement to be entered into should include a contractual provision requiring the supplier to comply with GFNorte's Anti-Corruption Policy.

5. **Assessment of Risks:**

a. The effectiveness and efficiency of compliance with the Anti-Corruption Policy shall be monitored by the Executive Directorate of Operational Risk, which must incorporate into its risk management methodology operational risk indicators related to acts of corruption, calculated based on the information obtained in the performance of its duties. The results of such monitoring shall be reported to the relevant

Corporate Governance Bodies.

b. The Reputational Risk that may be derived from an act of corruption shall be managed according to the policies established on the subject.

6. **Communication:**

a. The Office of the Assistant General Director of Communication and Public Affairs shall establish communication programs that promote the importance of integrity in the actions of employees and publish the tools and means to fight any corrupt actions that may be identified.

7. **Use of information:**

a. The classification, administration and management of information of GFNorte and its companies shall comply with institutional regulations.

b. Any transactions by Directors, Officers and Employees in the securities market must be made in compliance with the regulations and Institutional Provisions.

c. An employee's or officer's failure, for their own benefit or that of a third party, to comply with the procedures applicable to their duties in connection with Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) and the Sanctions Program shall be considered an act of corruption.

8. **Verification:**

a. The Audit Office, in the performance of its duties must include, as part of the aspects to be reviewed in audits of the processes defined in its annual plan, an assessment on whether the general controls in processes are effective to prevent and, as the case may be, identify acts of corruption, reporting the detected situations to the Audit and Corporate Practices Committee.

9. **Sanctions:**

a. The Labor Sanction Enforcement Handbook establishes the guide to be followed for purposes of response to irregular acts; likewise, the Security Committee shall analyze the origin of the damage or risk of irregular events in which employees or third parties participate, in order to implement provisional measures to avoid repetitions, through changes in operating and/or administrative processes, and alert messages to senior officers, officers and employees.

b. The decisions made by the Security Committee shall be documented in the minutes of the corresponding meeting. The Committee shall also be responsible for implementing the resolutions adopted and, where applicable, for ensuring, through the General Administration Division, that any written warnings are included in the relevant personnel files.

10. **Monitoring:**

a. The control functions comprising the Second Line of risk management within the Internal Control System, which is designed to preserve the Institution's value (Legal, Risk, Internal Control, with the support of Process and Management Controllers, and the Information Security Officer), shall, each within the scope of its respective responsibilities, contribute to the identification of risks, the implementation of controls and regulatory updates deemed necessary to strengthen the Anti-Corruption Policy, and the

reporting of incidents.

(i) Likewise, the control functions, Internal Audit, the UNE, and the Process and Management Controllers shall be responsible for reporting to the Executive Directorate of Operational Risk any identified event related to acts of corruption, regardless of whether or not such event has resulted in financial loss to the Institution.

b. Acts of corruption of relative importance will be reported with the control measures implemented by the Deputy General Comptroller's Office to the Audit and Corporate Practices Committee, and the Board of Directors will be informed of the situation through this Governing Body.

11. **Cooperation in the conduction of investigations**

a. All employees and officers must provide Internal Audit, External Audit, or the relevant authorities with any information requested for the purpose of clarifying the facts or determining their respective responsibilities.

(i) Deliberately concealing information, providing false or inaccurate information, or refusing to provide background information and/or evidence relating to a case shall be considered an act of corruption.

b. Crimes are covered whenever, among others, employees or officers provide assistance or cooperation to the author of a crime, conceal or favor the concealment of the person responsible for a crime, and the effects, objects or instruments involved in the same.