1.04.01 Internal Control Objectives and Guidelines

Scope

This Manual is of general application for the companies comprising GFNorte.

1. Introduction:

A. Grupo Financiero Banorte (GFNorte) pays special attention to internal control when performing its operations, in the origination, processing, and disclosure of its accounting and financial information, in its relationships with its Board of Directors, investors, clients, authorities, suppliers, and to the public, and the performance of the applicable regulations.

B. The Internal Control System (SCI) of GFNorte sets forth the following general objectives and guidelines, which provide the framework for the actions and responsibilities of all employees, who are at the core of the primary control functions and has specialized areas to support the monitoring and surveillance of its risks and controls. We are convinced that having an appropriate control environment is one more of the competitive advantages that will support the growth of our presence in the Mexican financial market.

C. Objectives regarding internal control and the general guidelines derived therefrom have been approved by GFNorte's Board of Directors and are the pillars of SCI, which is based on the principle that the members of the Board of Directors themselves, the collegiate bodies, the Senior Management, all officers and employees are part of Internal Control.

D. **The Internal Control System (ICS) is structured in accordance with the Three Lines Model for risk management, aimed at protecting the Institution's value:**

1. **First Line: Operational Management (Risk Owner).** This line comprises the business and operational areas that generate revenue and execute day-to-day processes, under the key principle that "those who generate the risk are responsible for managing it."

2. **Second Line: Risk Oversight and Specialized Risk Management.** This line comprises the areas that establish methodologies and monitor and challenge the First Line. In other words, the Second Line does not conduct business; rather, it oversees, monitors, and challenges it.

3. **Third**: Internal Audit, which with the independence granted by its report to the Audit and Corporate Practices Committee, reviews the activities and the proper development of the functions of all areas.

E. Although this document has a general scope for GFNorte, in some sections the particular responsibilities of certain positions related to Banco Mercantil del Norte are mentioned, therefore, in its interpretation and application in each of the Group´s companies, equivalence should be considered in terms of those responsible for carrying out the functions in question.

2. Internal Control Structure:

A. An appropriate internal control structure allows us to generate the necessary control environment to facilitate the implementation of control activities, which positively affects risk management, reliability of the financial information, and compliance with regulations. GFNorte's Internal Control structure is evidenced in the institutional standards, section 1.4.2 "Internal Control Structure".

3. Internal Control Objectives:

A. That GFNorte operates according to the strategies defined by its Board of Directors having the necessary human, technological, and material resources; efficiently using them, always trying to assist in the maintenance of the environment and the fulfillment of the following principles:

1. Ensure the best customer experience when using our financial services, considering their voice as one of the pillars of our strategy.
2. To be the best specialize bank, consolidating the digital model in our operations.
3. Maintain simple and agile processes, ensuring optimization and guaranteeing service delivery in the manner the customer requires.

B. That there is an appropriate decision-making process and a reliable information disclosure to its Board of Directors, investors, clients, competent authorities, suppliers, and the public, with information systems with the required quality, sufficiency, safety, and timeliness.

C. That the risks are identified, assessed, and monitored to keep an effective control thereof and reduce to a minimum any possible losses through its appropriate management.

D. That operation processes conform to the resolutions of the Board of Directors and assessed to verify the operation of controls and take, if applicable, any corrective measures in a timely manner.

E. That the operation complies with external and internal regulations without losing focus on customer service.

F. That financial inclusion be considered in the design and implementation of new products and services, establishing mechanisms for the client to carry out their transactions with the lowest cost in terms of money, time and commute; with fair contracts, transparency in communication, protection of personal data, and information security.

In this regard, particular attention is given to customers from vulnerable groups, such as older adults and individuals with specific physical conditions, who are provided with dedicated service through the various channels made available by GFNorte.

G. Officers and employees perform their jobs with discipline, ethically, enthusiastically, and in compliance with the regulation, being aware of their obligation to act according to the principle of doing things right since the first time and not to rely on the reviews made by other areas.

This principle of excellence is the basis that supports both the business area that is the face towards our clients, and the operational one which governs each of the processes; and making it alive is an obligation and responsibility of all that collaborate in the Institution.

4. General Internal Control Guidelines:

A. **Human Resources:**

1. **Non-Discrimination**: Any discrimination in hiring, compensation, access to training and/or promotion, because of sex, age, religion, race, social origin, disability, ethnic origin, nationality, sexual preference, family responsibilities, civil status or any other condition that may lead to discrimination is prohibited.

2. **Organization**: The organizational structure proposed by the Chief Executive Officer must be aligned with the defined strategies and presented to the Audit and Corporate Practices Committee for approval by the Board of Directors. The Board of Directors must consider and, where appropriate, authorize any changes to the organizational structure down to the level immediately below the Chief Executive Officer.

3. **Compensations and Benefits**: The compensation structure shall be authorized by GFNorte's Executive Management through the General Administration Division, which shall ensure that employee compensation is equitable across comparable positions and functions and aligned with market conditions, while seeking to adhere to applicable best practices for administrative and sales areas (customer-facing roles).

4. **Appointments**: For every designation and appointment to the position of Chief Executive Officer and to positions within the two organizational levels immediately below the Chief Executive Officer, the information requirements to the relevant authorities, as established by internal and external regulations, must be met.

5. **Publication of Vacancies**: In compliance with the principle of transparency and aiming that all personnel be able to apply for opportunities that represent improvements in terms of hierarchical position and development of competencies, vacant positions shall be published internally by the Recruitment Executive on the Human Resources institutional platform, in accordance with the provisions set forth in the Recruitment and Selection of Personnel manual.

6. **Promotions**: Employees and officers having any personnel in their charge shall not deny them the opportunity to participate in a candidate selection process for a higher position. In the event that any member of the work team is elected, the immediate boss shall not oppose the promotion of the personnel.

7. **Definition and Assessment of Objectives**: Employees and officers who, due to their organizational level or responsibilities, are subject to periodic performance evaluations must adhere to the Institutional model, which is designed to promote the continuous review of individual and team performance, foster the alignment of objectives, ensure quality service to internal and external customers, promote the proper assessment and management of risks, and encourage effective communication between employees and their immediate supervisors.

   At least semiannually, progress toward the objectives established at the beginning of the year shall be reviewed, and the immediate supervisor shall provide feedback on the achievements attained, indicating whether the original objectives need to be adjusted.

8. **Description of Positions**: The CEO position and all second-level positions of any senior personnel must describe their functions and responsibilities in a clear manner, including those related to the control of their processes and the required profiles.

9. **Conflict of Interest**: In every process or operation, it must be ensured that no conflict of interest exists in the performance of personnel duties. For these purposes, a conflict of interest is understood to arise when the interests of the Organization conflict with the personal interests or responsibilities of the individual performing such duties.

GFNorte forbids any Board Member, Officer or Employee from taking any reprisal against his/her superiors, peers, and subordinates for having reported any failures to comply with any regulations of the Code of Conduct.

Any reprisal must also be discreetly reported to the Comptrollership Deputy Managing Director and/or the Deputy General Directorate of Special Affairs Audit Directorate, or through the electronic channels established at the Institution.

10. **Separation of Functions**: In the design of the organizational structure, authorization, execution, assessment, conciliation, custody, and recording functions must be duly separated, and there must be an appropriate independence among any areas that have different functions in critical processes. Likewise, the delimitation of functions must allow for the efficiency and efficacy in the performance of the personnel activities.

11. **Authorities**: Only the duly authorized personnel, considering the limits set forth in the regulations, as well as those approved by the collegiate bodies, can authorize any kind of transaction, operation, expense or investment.

12. **Training**: All personnel performing a role within the Organization must receive appropriate induction and training, be informed of their responsibilities and authorities, and have access to the necessary up-to-date materials containing the policies and procedures they are required to know for the proper performance of their duties.

    a. Training provided to employees must include, among other topics, the promotion of a culture of control and information security, risk prevention, fraud prevention, anti-money laundering and counter-terrorist financing, personal data protection, economic competition, the Code of Conduct, anti-corruption, the Business Continuity Plan, the importance of regulatory compliance, and information technology security (cybersecurity).

    b. In order to preserve the integrity, objectivity, and validity of training course assessments, the use of Artificial Intelligence tools to generate, obtain, or provide answers to such assessments is prohibited. Responses must be prepared directly by each employee, based on the knowledge acquired during the training, in order to individually and effectively demonstrate their understanding of the content provided.

13. **Integrity Tests**: GFNorte's CEO, together with the Administration Managing Director, must conduct an evaluation at least once every three years for employees in the areas defined in the Fraud Prevention Management Plan, to ensure that they possess not only the necessary technical quality and experience but also the required integrity for the activities they perform.

14. **Health Plan**: GFNorte must provide to its officers and employees the respective health plans to maintain their health and a healthy life, by leading internal information campaigns related to the prevention and prompt detection of diseases, as well as means of access to the care thereof.

15. **Prevention of psychosocial risks at work**: GFNorte's CEO, together with the Administration Managing Director, must analyze and implement programs focused on the prevention, identification, and analysis of psychosocial risk factors among the personnel, which must consider carrying out periodic evaluations of the organizational environment, promoting a permanent model that forms part of the continuous improvement process.

16. **Aid in the event of a disaster**: Any employee of any of the companies of GFNorte who is affected by any natural disaster and/or adverse weather condition may be assisted in accordance with the strategy approved by GFNorte's Management. For the abovementioned aid to be provided, the natural disaster and/or adverse weather condition must have to be officially recognized by the Civil Protection Office of any of the three government levels: municipal, state or federal.

17. **Care protocol in the event of a health contingency**: GFNorte will establish the necessary measures aimed at preserving the health of employees and officers in the event of a health contingency scenario, seeking, when applicable and depending on the case, the offer of vaccination schemes; implementing access control policies to administrative buildings and branches; protocols to maintain customer service; communication of preventive measures; timely attention and granting of temporary disability for personnel who present any symptoms of contagious disease and implementation, where appropriate, of work schemes in confinement.

18. **Code of Conduct**: The members of the Board of Directors, as well as the personnel of GFNorte and any other external personnel providing services to the Group must follow and behave according to the provisions of the Code of Conduct.

    Given that a key element for the proper functioning of internal control is its ongoing monitoring and updating, the Board of Directors reviews and approves the topics contained in the Code of Conduct on an annual basis. Once the corresponding review is completed, the Deputy General Directorate of Internal Control will be responsible for managing an exercise, with support from the Human Resources technology platform, through which personnel will be informed of the main changes, encouraged to consult the full document on the Institutional Regulatory Portal, and asked to reaffirm their commitment to act in accordance with its guidelines in their daily activities.

19. **Social Networks:** GFNorte has institutional social networks designed for official affairs, so officers and employees must refrain from sharing confidential, internal or privileged information of the Institution on their personal social networks; advertise products, services or promotional campaigns and/or identify themselves as collaborators without having the authorizations of the Deputy Managing Director of Communication and Public Affairs and the Deputy Managing Director of Comptrollership; having to ensure at all times that the published comments or images are in a personal capacity and do not damage the image of GFNorte, which we must

preserve as members of the Institution.

B. **Technological, Telecommunications and IT Infrastructure:**

1. **Safety**: The information, technological infrastructure and technology operation process systems must provide sufficient identification, authorization, and protection mechanisms for a safe operation, both on the platforms and internal applications, as well as in the information interfaces shared with correspondents and suppliers, likewise, they must have the capability to monitor and identify transactions that may potentially originate from fraudulent activities or illicit operations. All safety policies and procedures regarding information must be checked and adjusted from time to time.

2. **Access profile control**: The profiles of access to different information platforms, applications or interfaces must be aligned with the description of positions of the employees and officers, in order ensure that the proper permits are granted according to positions and functions, monitoring that an appropriate separation of functions is respected at all times.

3. **Completeness of information**: Sufficient and reasonable safety and operation mechanisms must be implemented in order to prevent any unauthorized addition, modification or destruction of data, allowing an appropriate registration of transactions.

   Measures to investigate, report and sanction any cases of alteration of information must be established.

   Regarding any destruction of data, techniques or procedures not damaging the environment must be used, trying to recycle the material without jeopardizing the confidentiality of the information. In case of any electronic destruction, measures guaranteeing the safe and definitive deletion of information must be used.

4. **Accountability of the functions of the "Chief Information Security Officer (CISO)"**: In the fulfillment of his functions, the CISO reports to the CEO of GFNorte and must carry out periodic reviews to evaluate the internal control in security matters of the information, measuring the risk indicators established in the regulation, notifying the findings and the remediation plans that derive from the monitoring that will be carried out within the framework of an annual plan and prepare an annual Master Plan on Information Security, considering also the risk analysis to which GFNorte is exposed, based on its applications and communications infrastructure. Likewise, it will follow up on the observations derived from internal reviews, vulnerability tests and ethical hacking that are developed.

5. **Maintenance**: The computer and telecommunication equipment, as well as the systems and programs used to support the business operation, must have the necessary and sufficient maintenance and support services

required for their appropriate operation.

6. **Contingencies**: The operation of the information systems must contemplate recovery plans that include information backups, redundancies in the operation of critical processes, and documented action plans to face any failures, emergencies or disasters in accordance with the Business Continuity Plan and the Recovery Plan in Case of Disaster. The effectiveness of the recovery plans and procedures must be tested periodically**.**
7. **Recording of Transactions**: Information systems must keep an activity registry to have audit footprints allowing them to verify any operations.

8. **Development, installation and change of computer and communication systems and equipment**: They must be carried out according to any policies and procedures preventing any safety, completeness and reliability risks for the information and availability of services in operation.

9. **Use of Artificial Intelligence:** When incorporating Artificial Intelligence into the development and implementation of new technologies, it must be ensured that it is used in furtherance of GFNorte's legitimate interests and to serve our customers or improve internal processes, while ensuring its ethical use, fairness, transparency, clear language, non-discrimination, traceability, and information security, the latter in compliance with applicable regulations. The relevant control areas and the persons responsible for the area that will use the technology must be informed in order to assess the associated risks.

C. **Material resources:**

1. **Efficient administration of assets:** Any assets owned by GFNorte must be used for the purpose for which they were acquired. Those not being used must be sold or donated for their use by and for the benefit of charitable institutions, or as part of any disaster victims support, in accordance with the policies to be established for said purpose. The fixed asset control policies to be defined must consider the responsibilities of their good use and preservation by the employees who manage them.
2. **Investment**: Any investment in fixed assets must align with the strategies defined by the Board of Directors and subject to the limits fixed by the regulation.
3. **Suppliers**:
   a. **Reliability of suppliers:** The conditions for every supplier to comply in due time and manner with any agreed commitments must be established and avoid, as far as possible, relying on a single material and/or technological resources supplier that may jeopardize the operation, continuity or efficiency of GFNorte. If this is not possible for any reason, there must be an alternative supply or operation plan to face a contingency.
   b. **Supplier selection**: The criteria for suppliers' choices, such as technical capacity, reputation, prior

experience with them, scope of deliverables they offer, cost/benefit ratio, must be taken into consideration in the selection of suppliers, and even though price is an important factor, it is not decisive for purposes of selection. Likewise, it should be considered that the supplier is not included in the Internal Bureau, has no aspects related to blacklists, or that it has been involved in a lawsuit against or sued by Banorte or has caused any economic damage.

In conditions of similarity of price and quality between two suppliers, preference may be given to one that is recognized as a Socially Responsible Company and if its practice is familiar with social and environmental protection issues.

c. **Procurement Modalities**: Procurement may be carried out under the following modalities, considering at all times the detail that is contemplated in the Institutional Procurement Handbook:
   (i) **Quotations**: The required quotations must be available according to the cost of the acquisition in accordance with the provisions of the Institutional Procurement Handbook.
   (ii) **Auction**: An auction is understood to be the supply of a good and/or service through bids made by suppliers through the Ariba tool.
   (iii) **Supplier Assignment**: The Director of Material Resources is responsible for authorizing purchases in this modality, in accordance with the provisions of the Institutional Procurement Handbook.
   (iv) **Internet purchases**: In the event that the Acquisitions Manager/Analyst determines that the Internet is the only means to acquire the goods or services requested, he must leave evidence of the analysis performed.
   (v) **Cataloged goods and/or services**: In this modality of the Ariba system, the user, when making a request through a requisition, will be able to select the required good or service from the available catalogs.

d. **Supplier hiring**: Any hiring of suppliers must follow the provisions of the Supplier Contracting Handbook of goods or services and any applicable internal regulations.
   It shall be understood that the terms of any agreement, letter of agreement, commercial agreement, framework agreement, confidentiality agreement or any other document representing the rights and obligations for the Institution regarding the supply of goods or services, are synonymous with an agreement and, therefore, are subject to verification by the Agreements Legal Department.

(i). The Institution may contract with any third parties, including other national or foreign financial institutions or entities, the provision of any services necessary for its operation, as well as any commissions to execute the operations provided by Article 46 of the LIC, subject to the provisions of Chapter XI of the “Circular Única de Bancos”.

(ii). The contracting of Commission Agents shall be subject to the authorization of the National Banking and Securities Commission. Likewise, mechanisms for the selection and contracting, training and performance evaluation of the Commission Agent, as well as the verification of its business continuity plans must be implemented.

(iii). Any agreement with a supplier implying the management of an operation process and the management of databases must be submitted to authorization of the Audit and Corporate Practices Committee / Risk Policies Committee before its formalization, and be compliant with the applicable provisions, containing all necessary protection for the Institution, as well as the obligation the supplier to inform the Institution regarding any safety measures concerning the information supplied to it and the measures to be taken in the event of a contingency, with the Institution having the right to request any necessary audits to verify compliance with the above.

(iv). In the case of hiring a supplier that uses external personnel to provide its services, who ask to carry out their work at GFNorte's facilities, which are not part of the company's corporate purpose or preponderant economic activity, it must be verified that its corporate purpose preferably includes textually the "provision of specialized services". Individuals and entities that provide these services must be registered with the STPS (Secretaría del Trabajo y Previsión Social) for which they must be up to date with their tax and Social Security labor obligations, thus obtaining authorization to form part of the Registry of Specialized Services Providers or Specialized Works (REPSE). In addition, the corresponding contracts and/or documents must include the recommendations issued by the Executive Director of Human Capital, the Executive Director of Human Resources, and the Agreement's Legal Director.

(v). In the case of the execution of contracts for the provision of services in which the handling of personal data of clients and employees by the supplier is involved, the Deputy Director of Control of Regulatory Provisions may issue recommendations and/or comments in this matter, which must be considered in the terms of the contract.

If a risk in terms of personal data processing is identified, it will be the Director of the requesting area, who must ensure that the findings and recommendations by the Institution are resolved by the provider prior to the start of operations.

In the event that even with the aforementioned, contracting the provider implies maintaining an incremental residual risk, it will be necessary to present the case for the authorization of the Personal Data Protection Committee.

e. **Contracting Bonds**: The Procurement Department must contract a bond from the supplier in the following

cases:

(i) Suppliers that carry out the treatment of a database of clients and/or prospects of Banorte for the offer of products and/or services.

(ii) Suppliers in which some type of risk in terms of personal data protection is identified.

The amount of the deposit will be established according to the criteria approved by the Committee for the Protection of Personal Data.

D. Information:

1. **Accounting policies**: Financial information must be prepared in accordance with the Financial Reporting Standards issued by the Mexican Financial and Sustainability Reporting Standards Board, as well as with the provisions issued by the regulatory authorities and international accounting guidelines, where applicable.

2. **Internal Accounting Control**: The documentation of material processes directly based on financial information must be permanently updated, and periodic effectiveness tests of the controls included in the processes must be carried out. The subsidiaries of GFNorte which, due to their regulation require the opinion of any external auditors on the subject, must perform their functions.

3. **Sole source**: All financial and management information for the internal decision-making process, and that is generated to comply with the regulations, must be consistent with accounting. Financial, economic, legal, and administrative information must reach the personnel according to their functions and authorities, and the collegiate bodies requiring it, and must contain the necessary elements for a correct decision-making process and comply with the applicable regulations.

4. **Confidentiality**: The financial, accounting, legal, and administrative information generated by GFNorte is confidential and exclusively for its internal use, except for any information subject to disclosure in accordance with the applicable regulations. Measures must be established for the personnel and external suppliers who have access to confidential information, maintain it as such.

5. **Banking and Trust Secret**: Any banking, trust and stock exchange secret must be kept upon the terms of the applicable legal provisions.

6. **Data protection**: Any personal information owned by third parties, known to GFNorte due to its commercial relationships, must be treated with the same care and under the same standards as any confidential information. Third-party information includes their personal information, that of their employees, their families, their references,

as well as any financial and patrimonial information and, if any, sensitive information of the abovementioned people.

At all times, the ARCO rights granted by law to personal data subjects must be respected, including the rights to access, rectify, and cancel their personal information, as well as to object to its processing.

Likewise, in connection with cross-selling efforts for the products offered, it must be verified that no offers are made to customers and/or users registered with the Public Registry of Users (REUS), or to those who have exercised their right to object to the processing of their personal data.

In addition to the foregoing, interactions with customers for advertising purposes must:

a. Take place during appropriate hours (9:00 a.m. to 7:00 p.m.).
b. Be conducted by an employee who must identify themselves by their full name and inform the customer that the purpose of the contact is advertising or marketing, in accordance with the Personalized Offers Manual.

7. **Planning**: The Annual Plan must consider, in addition to general action strategies, the internal and external macroeconomic factors, the competitive environment in the system that may have an impact on the business, as well as the financial result expected from such strategies.

8. **Regulatory information**: The regulatory information and the information requirements of authorities must be delivered in due time and form.

9. **Conciliations**: A permanent conciliation process of the different application systems with accounting must be conducted. An analysis of significant variations in the different accounting records must be made in order to detect and correct possible errors on time.

10. **Information request by Directors**: It is the Management's responsibility to respond to any information request made by any Board Member through the Secretary of the Board of Directors.

11. **Information on products and services**: The information given to the general public with respect to the products and services offered by the Institution must be sufficiently clear, complete, precise and timely, in order for all clients, no matter age or physical condition, to have all necessary elements to make the decision to contract the required product or service that meets their financial needs in compliance with the applicable regulations.

E. Risk management:

1. **Risk identification, assessment, and measurement**: Risks inherent in the Institution's operations, including credit, balance sheet, market, counterparty, operational and technology, legal, reputational, strategic, business, sustainability, emerging, and regulatory risks, must be assessed by the responsible governing committees, measured by specialized areas equipped with the appropriate tools to perform their functions, and controlled by the areas responsible for managing such risks. Sustainability and responsible investment considerations must also be incorporated into the decision-making process.
2. **Limits**: Operations must be executed respecting the risk limits established by the Board of Directors and the authorized bodies, taking into consideration those established by the current regulations.
3. **Monitoring and information**: Monitoring mechanisms of the various risks, as well as compliance with exposure limits must be respected in order to detect any deviation in due time, take the corresponding corrective measures and inform the competent bodies.
4. **Registry**: Keep a centralized base for risk management and compliance with controls allowing to trace the risks from their identification to their mitigation and monitoring, centralizing the registration and monitoring of any corrective action plans derived from any reviews, audits, incidents, risks, among others.

F. Fraud prevention:

i. **Internal control**: GFNorte must strive to implement measures to monitor, identify, measure, prevent, control, and respond to potential behaviors or actions that may threaten the interests and assets entrusted to us by our clients or those of the Institution itself. These may include:

   a. Impersonation of the client.

   b. Theft of personal and financial information from the client.

   c. Impersonation of the Institution.

   d. Misuse of privileged client information.

   e. Compromise of electronic means contracted by the client with the Institution, aimed at installing malicious code capable of altering monetary transactions.

   f. Alteration or issuance of fraudulent checks.

ii. **Management Plan**: GFNorrte's CEO's must review and approve the fraud prevention management plan, which outlines the institutional efforts for the prevention, detection, and response to the aforementioned behaviors or actions.Particularly important is the protection provided by GFNorte's banking entities to safeguard client

transactions carried out through various channels, such as branches, online banking, ATMs, and banking agents. To this end, controls must be established to monitor transactional parameters based on the information provided by the client.

iii. **Reporting**: Directors, officials, and employees who become aware of any of the aforementioned behaviors or actions must report in accordance with the provisions outlined in the "Reporting Procedures" section of the Code of Conduct.

iv. **Sanctions:** A zero-tolerance approach shall apply to any of the conduct described in item 1 above, and the corresponding sanctions shall be imposed in accordance with the Labor Sanctions Manual.

G. Communication with clients via text messages (SMS) or Quick Response (QR) codes:

i. GFNorte, aware that the use of SMS messages and QR codes are channels through which clients may be exposed to potential fraud, is strongly committed to making controlled and responsible use of these communication methods.

ii. Therefore, the Area Directorates that, in the course of their functions and projects, intend to communicate with clients through these types of messages must notify the Business Development Digital Control Office, so that the proposal can be jointly analyzed with the Executive Directorate of Innovation and Marketing.

H. Communication with Customers to Prevent or Mitigate Fraud

i. Through its Fraud Prevention Management Plan, GFNorte establishes customer communication campaigns aimed at preventing customers from falling victim to potential fraudsters. These campaigns provide customers with fraud prevention guidance, inform them of the official channels through which the Institution communicates with them, and explain the authentication, verification, and approval mechanisms applicable to their transactions.

I. Continuous improvement process:

i. **Assessment**: The status of the SCI must be assessed yearly, both regarding its Objectives and Guidelines and its comprehensive operation, and reports must be submitted to the Audit and Corporate Practices Committee and to the Board of Directors, including any material deviations. Likewise, the Code of Conduct must be annually revised and, if applicable, propose any modifications thereto, which must be submitted by the Audit and Corporate Practices Committee for approval of the Board of Directors.

ii. **Provisions update**: Any manuals derived from the incorporation of new products, services or processes must be documented or updated, as well as the improvements proposed by the responsible areas, of any observations of the Risks, Comptrollership, Internal Audit, External Audit areas and of the observations of the competent authorities.

iii. **Corporate governance**: The functions, authorities and integration of the various decision-making collegiate bodies must be kept updated, evidencing the decisions they may make, ensuring the efficacy and efficiency of their activities.

iv. **Responsibility**: The responsibility to keep internal control in line with the General Internal Control Objectives and Guidelines, and to monitor their effectiveness, corresponds to the directors managing the different processes, who must ensure that they have sufficient controls to mitigate any risks, documented processes, keeping appropriate accounting records, protecting the institutional assets from misuse, to see that the information used in the decision-making process is reliable, appropriate, precise and timely, and for its correct publication, this will be achieved through a risk and control matrix, which must be approved by the Process and Management Comptroller of the area and by the Executive Directorate of Regulatory Comptrollership and Expenses. Even though the foregoing allows us to reasonably manage any risks of errors, losses, or frauds, it cannot be guaranteed that the same will not occur.

v. **Operations with related parties**: In all operations among GFNorte's companies, there shall be no conflicts of interest, they must be exercised within market conditions and in compliance with all requirements and limits set forth in the regulations of each entity.

The operations with related parties or legal entities exceeding 5% of the assets of the Institution must be submitted to the Board of Directors for authorization.

vi. **Free loans, loans, or any type of credits or guarantees to related parties**: Any kind of free loans, loans, or credits or guarantees to be granted to related parties, must be authorized by the Credit Committees of the Institution, always monitoring their compliance with the regulations.

J. Personnel Safety:

i. GFNorte provides a safe and healthy environment and takes effective steps to prevent any accidents or potential damage to the health of its employees, minimizing, to the extent possible, any risks inherent to the work environment.

ii. The Deputy General Directorate of Security and Fraud Prevention, together with the respective authorities, must conduct drills of any situation that may jeopardize the health and integrity of the personnel, so that such personnel know what to do and how to react in the event of an emergency.

K. Compliance with external and internal regulations:

i. **Compliance**: Internal standards must comply with the applicable regulatory provisions.

ii. **Tolerance levels**: There are no tolerance levels for any risks implying failure to comply with the laws and deviation from these Internal Control General Guidelines.

iii. **Operations**: Only the operations approved by the authorized bodies and personnel must be executed.

iv. **Institutional Standards Portal:**

1. The Institutional Standards Portal is the only source of consultation regarding the policies and procedures for GFNorte's operation.

2. Only authorized operations shall be incorporated into the Institutional Standards.

3. Any other related information not included in the portal, shall not be considered official.

v. **Issuance/Update**: The Area Director is responsible for having the standards that rule the processes he/she manages and if he/she does not have them, he/she must request the Executive Director of Regulation Comptrollership and Expenditures or the Risk Policies Director, the issuance or updating of such standards. Standards must be permanently updated and made available to the personnel.

vi. **Prevention of Illegal Operations**: An appropriate monitoring of operations made by the clients must be done in order to prevent any frauds, and also to prevent GFNorte from being used for money-laundering and terrorist financing purposes, assisting the competent authorities at all times in accordance with their responsibilities.

vii. **Verification and Monitoring**: The Internal Audit areas and those areas carrying out any Internal Comptrollership functions must have unrestricted access to the various areas and information that may be necessary to monitor and verify compliance with standards.

viii. **Internal Control Report**: The provisions of the regulations must be performed in due time and manner, in connection with the opinion on the appropriate performance of the SCI prepared by the external auditor and the report submitted by the Comptrollership Deputy Managing Director to the Audit and Corporate Practices Committee on its internal control follow-up activities.

L. Follow-up to Audit observations:

i. It is the responsibility of the process owners, to give timely follow-up to the observations of Internal and External Audit that are related to the processes under their responsibility, paying particular attention to those that are classified as high or very high risk or are related to the issuance or updating of regulations, periodically informing their hierarchical superiors, the Process and Management Comptrollers and the Auditor himself, the progress in the remediation plans that have been agreed for this purpose.

M. Donations:

i. All donations must have the authorizations contemplated by the respective regulations and at no time they shall have as purpose any act of corruption or be used for financing of or support to organizations or candidates to popular election positions representing a political party or acting independently.

N. Anticorruption:

i. GFNorte's CEO must establish the necessary measures to prevent any acts of corruption in the conduction and performance of the business and operations of any of the Financial Entities members of GFNorte, and in the event that any act of corruption occurs, investigate and sanction it.

O. Economic Competition:

i. GFNorte's CEO must adopt a series of measures to promote, protect and guarantee economic competition as well as to prevent and investigate, if applicable, any monopolistic practices, illegal concentrations and barriers to free competition, and any restrictions to the efficient operation of the markets that may be derived from any decisions made or resolutions passed by any officer of GFNorte.

P. Launch of products and services:

The launch of products and services must be supported at all times in compliance with external regulations, best practices and healthy economic competition, with the understanding that any initiative requires a prior analysis of the inherent operational risks and the controls necessary to mitigate them.

If any officer, manager or employee becomes aware that the business proposal in question fails to comply with any of the aspects mentioned in the previous paragraph, they must report it to the General Directorate of Regulatory Internal Control or through the institutional complaints tool.

Q. Fair Treatment of Customers and Transparency of Information:

i. GFNorte upholds high standards of personal care and absolute respect for its customers, guided by the principles of respect, inclusion, legality, honesty, diligence, transparency, and fair treatment in the offering and contracting of our financial services, taking into consideration the following:

1. Every person must be treated with respect, enhancing their value as human beings, avoiding any type of violence, mistreatment or physical or mental humiliation; always guaranteeing a safe physical and technological environment, and encouraging their freedom and autonomy in making financial decisions.

2. Customers shall be treated without distinction and on equal terms; however, particular attention shall be given

to the specific needs of vulnerable groups, including, for example, preferential and priority service through in-person or remote service channels (branches, ATMs, contact centers, and electronic banking) or, under certain circumstances, assistance at the customer's place of residence. The confidentiality of customers' personal, sensitive, and financial information shall be ensured at all times through the application of institutional and regulatory verification, protection, and security measures, in accordance with the fundamental principles of legality, accessibility, inclusion, and non-discrimination.

3. When offering financial products or services, clear, simple, and appropriate language must be used, taking into account each customer's particular circumstances and needs, in order to ensure that the information provided is properly understood. Customers must be provided with clear, objective, complete, up-to-date, and accurate information regarding the features of the product or service, eligibility requirements, and how it operates, enabling them to select the product or service that best meets their needs.

ii. Regarding accessibility in the handling of information and management of resources, we will seek at all times that the formalities or procedures to be carried out by the client both in the contracting of products and in the management of its resources are clear, simple and easy to understand, making available a channel for the attention of possible inquiries, acting with objectivity, impartiality, and independence, honoring the trust of our clients and protecting their interest and the assets they entrust to the Institution.

iii. Prior to entering into a financial product agreement or conducting certain transactions in person, customers must be informed of the regulatory requirement to verify their identity and of GFNorte's commitment to protecting such information in accordance with the applicable laws and regulations.

iv. GFNorte promotes for its client's permanent financial education programs, which aim at the full knowledge of the scope and use of the financial products and services offered, including details of the technical, economic, and operational characteristics, in order to ensure informed decision making. Moreover, preventive measures are included that should be considered to reduce the risk of becoming victims of potential fraud.

v. GFNorte promotes clear and transparent advertising directed at customers, providing up-to-date technical, operational, and financial information and encouraging them to review such information and consult with their customer service representatives to ensure that the products and services they intend to contract are suitable for their particular circumstances, without making their purchase conditional upon other products that they do not want or require.

   Customers must at all times be offered services or products that are appropriate for their profile, either individually or as part of a comprehensive offering that serves their interests, in order to promote their active, productive, full, and effective participation in the management of their financial resources.

vi. In the case of advertising campaigns, GFNorte clearly and accurately informs customers of the campaign's validity period, terms, conditions, and limitations, as well as any other information necessary to ensure a better

understanding of the offer.

vii. GFNorte makes various communication channels available to its customers, in addition to those specified in the relevant agreements, to encourage interaction as part of its “La Voz del Cliente” program and other initiatives, including messages through electronic channels, its website, and statement inserts.

viii. The characteristics and attributes of the banking services offered by GFNorte institutions have been previously reviewed and authorized by the Bank of Mexico and, as such, are published on its website. Additionally, they are stipulated in the contract that is formalized and delivered to the client, ensuring transparency in the handling of information and making it available to users of financial services.

ix. Through its customer satisfaction indicators (NPS – Net Promoter Score), GFNorte continuously reviews the processes established across its customer service channels to ensure the delivery of high-quality service and reduce customer friction points.

x. GFNorte maintains a genuine commitment to customer satisfaction by addressing any inquiry, clarification, claim, or complaint objectively and promptly, and by providing customers with various service channels, including branches, the Contact Center, Banorte Móvil, and the Specialized Customer Service Unit (UNE).

In this regard, visible notices throughout the branch network and on GFNorte’s website provide customers with information regarding the location, contact details, business hours, and the person or persons responsible for the UNE, as well as the option to submit a complaint directly to CONDUSEF.

The guidelines governing the handling of inquiries by the UNE are detailed in the internal regulation, *General Policies of the Specialized Customer Service Unit*, which addresses the handling of inquiries, complaints, clarifications, claims, disputes, and filings with CONDUSEF.

xi. GFNorte fully respects the customer’s decision to terminate the business relationship, providing detailed information on the requirements for cancelling the applicable product or service, without imposing any objection or obstacle that could delay the process, and providing the customer with written confirmation of the corresponding cancellation.

xii. GFNorte conducts its collection activities in accordance with practices based on full respect and courtesy toward debtors, as established in the General Collection Management Guidelines.

xiii. As noted in the section on personal data management, GFNorte promotes, complies with, and strengthens the regulatory and internal measures necessary to ensure the protection of the personal data of both customers and employees, and holds a certification in this regard issued by an independent third party with expertise in the field.

R. Use of Institutional Communication Channels:

1. **GFNorte** provides its employees with various communication channels as tools to facilitate the performance of their duties and collaboration with their work teams or with staff from other departments they interact with in the course of their responsibilities. Accordingly, the following should be observed:

   a. **Meetings:** These may be held in person, by phone, or via video call to exchange ideas and knowledge, propose solutions to specific issues, or review the results of project implementation, among other topics. To maintain meeting efficiency, they should last no longer than 50 minutes. (See the acceptable use manual for the video call system).

   b. **Email:** Institutional email is an official organizational communication mechanism and serves as an agile collaboration tool. Its use must comply with the acceptable use manual for email.

   c. **Instant Messaging:** The institutional Instant Messaging tool should be used to streamline communication among employees and, where applicable, with external users providing services to the institution. Users must ensure compliance with the acceptable use manual for instant messaging.

   d. **Internal Social Networks:** Regarding the internal social network, called *Viva Engage*, employees may express themselves freely as long as they verify before posting that the information shared is necessary, accurate, and does not involve personal data. At all times, specific policies for communication on social networks must be observed.

2. In any of the aforementioned media, employees must use a professional and respectful tone. They must ensure proper classification and handling of the information shared, in accordance with current institutional regulations.

S. Accusations:

1. GFNorte's Board Members, Officers, or Employees who become directly or indirectly aware of any irregular act, conflict of interest, or regulatory non-compliance that may cause or result in financial loss to GFNorte or its customers, or that may constitute a breach of any of the principles set forth in the Code of Conduct, the Anti-Corruption Policy, or these Internal Control Objectives and Guidelines, must report such matter discreetly to the Deputy General Directorate of Internal Control and/or the Special Affairs and Claims Audit Department, or through the electronic reporting channel established by the Institution.