

Code of Conduct

Banco Macro



Let's make Argentina to
think big, think in Macro.

INDEX

	Pag.		Pag.
1. INTRODUCTION. THE PRINCIPLES THAT MAKE US THINK BIG	05		
2. CODE OF CONDUCT. PURPOSE & MEANING	06		
2.1 Law Compliance.	07	3.18 Principles of Social Interaction. Social Media Activity.	15
2.2 Code of Conduct. Target Groups.	07	3.19 Institutional Representation of the Group.	16
2.3 Law Compliance. Action Criteria.	07	3.20 Professional Advice. Recommendations.	16
2.4 Code of Conduct. Sworn Statement.	07	3.21 Audits and Investigations.	16
3. OUR ACTIONS WITHIN MACRO COMMUNITY	08	3.22 Anti-money Laundering.	16
3.1 Confidential Information and Personal Data Protection.	10	3.23 Compliance with Security Standards.	16
3.2 Proper Treatment of Data Stored by Grupo Macro.	10	3.24. Internal Control Regulations.	17
3.3 AI Tool Use.	10	3.24.1 Collaborators with Supervisory Functions.	17
3.4 Conflict of Interests. Practice or Exercise of Activities outside the Group.	11	3.25 Public and/or Private Procurement.	18
3.5 Creation of Guarantees-Loans-Deposits.	11	3.25.1 Public Sector Relations.	18
3.6 Open Market Investments.	11	3.25.2 Relationship with Third Parties or Business Partners, including suppliers, distributors, service providers, agents and intermediaries.	18
3.7 Use of Accounts and Transactions of Banco Macro.	11	4. OUR RELATIONSHIP WITH MACRO TEAM	19
3.8 Business Relationships.	12	4.1. Respect and Inclusion.	21
3.9 Anti-corruption Policies.	12	4.2 Sanctioning Conducts considered to be harassment or intimidation.	21
3.10 Acceptance of Gifts and Invitations from Third Parties.	12	5. OUR RELATIONSHIP WITH THE COMMUNITY	22
3.11 Sending Gifts to Government Officials.	13	5.1 Commitment to fighting and preventing crimes committed in the field of financial business.	23
3.12. Expense Policy.	13	5.2 Commitment to Sustainable Management.	23
3.13 Bank Records and Accounting Entries.	13	5.3 Social Commitment. Participation in Social or Charity Actions.	23
3.14 Private Property.	13	5.4 Political Neutrality.	23
3.15 Use of Group's Resources and Facilities.	14	5.5 Responsibility for People's Well-being and Inclusion. Diversity and Pluralism.	23
3.16. Prohibition of Alcoholic Beverages and Unauthorized Drugs.	15	6. ETHICS & COMPLIANCE COMMITTEE	24
3.17 Obligation to Collaborate.	15		



1.

INTRODUCTION

THE PRINCIPLES THAT MAKE US THINK BIG.

THE PRINCIPLES THAT MAKE US THINK BIG.

All of us who are part of Grupo Macro have a strong commitment to dialogue and work to build close, ethical, transparent and long-term ties with a focus on sustainable development, complying and respecting the laws and regulations applicable to the financial activity and understanding that our contribution as a Group is a key element for the development of our country.

Our entity has always been committed to creating economic, social and environmental value in the short, medium and long term. We orient our actions towards the benefit of the community, with a clear goal: to be the most sustainable bank at federal level, providing the financial tools so that our customers can carry out their projects on a more transparent and agile manner.

The Group's commitment to the people who are part of it is based on the search for their well-being and personal growth. In order to achieve this, we design work policies aimed at promoting and enhancing diversity in the work environment and improving life quality through inclusion. We develop initiatives that reconcile professional and family life, understanding that our work teams are essential for our growth, since each person contributes and allows us to consolidate as a community ("We are more Macro").

Our organization creates initiatives so that each one can develop in a work environment where responsibility, execution, commitment, results, loyalty, honesty, good communication and teamwork are stimulated. As a cultural framework, purpose and principles are our Group's comprehensive vision to make things happen.



WE ARE PROTAGONISTS

We are Protagonists when we take charge: when we don't look the other way. We change things for our teams and customers.



WE ARE CLOSE

We are Close, where no other bank reaches, promoting the development of communities. We stand out by making room to all perspectives. We create inclusion at the micro level and celebrate diversity at the macro level.



WE ARE AGILE





We are Agile, we are in constant evolution and growth, this is possible thanks to our teams. We innovate, experiment on a collaborative manner, we don't stay on familiar ground.



WE FEEL PRIDE

We feel pride in our purpose, we transmit it and share it through every action. Let's continue to enhance experiences to live our brand to the fullest.

In addition, we identify attitudes or actions that stand in the way of achieving a pleasant work environment among the people who make up Grupo Macro and have an impact on our customers. We call them “non-negotiable attitudes”:

AntiMacro Attitudes (Non-negotiable)	
Thinking big is for Argentina to think big, think Macro.	<ul style="list-style-type: none"> ✗ I cling to continue doing things "because they were always done that way." ✗ We work in silos, the only priority is my management area. ✗ I don't delegate because I think anyone does it like me.
 WE ARE PROTAGONISTS	<ul style="list-style-type: none"> ✗ I base myself on my beliefs about what I believe to be right. ✗ The others have nothing to teach me. ✗ I don't think I'm doing things wrong; the problems belong to others. ✗ Play it safe and risk little. ✗ Be guided by unconscious biases. ✗ Thinking big is someone else's responsibility. ✗ I am a spectator in my day to day because others decide for me.
	<ul style="list-style-type: none"> ✗ I only get involved with those who are related to me. ✗ I focus only on the relationships that are useful to me. ✗ I always put hierarchies before the relationship. ✗ I have behaviors that threaten the dignified treatment of intersectional diversity.
 WE ARE AGILE	<ul style="list-style-type: none"> ✗ I assume that the other person already knows what to do. ✗ I prioritize that tasks and results are achieved, without considering how people feel. ✗ I don't share information and knowledge. ✗ Things are done as I see fit. I expect others to execute them.
 WE FEEL PRIDE	<ul style="list-style-type: none"> ✗ Being a detractor of the purpose. ✗ Speaking ill of our workplace. ✗ I feel indifferent about working at Banco Macro or somewhere else. ✗ Criticizing instead of proposing, using complaints as an excuse. ✗ Things are done as I see fit. I expect others to execute them.

Recognizing these *non-negotiables* and acting on them invites us to create daily relationships based on mutual respect, trust, kind and simple treatment, and to develop all activities with the highest ethical, work and personal principles.

Having in mind our goals, those of us who are part of Grupo Macro commit to have an honest, loyal, responsible and professional behavior. Our conduct has an impact on the Group's institutional image, and the Code of Conduct allows us to formalize our organizational culture.



2.

**CODE OF CONDUCT
PURPOSE & MEANING**

CODE OF CONDUCT. PURPOSE & MEANING

This Code of Conduct is intended to provide a framework of action and the main guidelines so that all those who are part of Grupo Macro act in the same manner and with the same values in similar situations. The trust placed in the people by the shareholders, the customers and the community in general, will depend largely on the fulfillment of these goals.

2.1 Law Compliance.

The people who are part of Grupo Macro must comply and behave in an honest, responsible and professional manner, respecting the applicable laws and regulations, as well as the internal present and future policies of the organization. We must bear in mind the value that the Group's actions have on the community, the importance of preserving the bank's reputation in the eyes of customers and the society as a whole.

In this sense, we must know and perform our tasks within the organization, following the values and interests on which the Group has built its identity and takes into account to project its business model.

2.2 Code of Conduct. Target Groups.

This Code of Conduct takes into account the principles and values of our organization, which define our identity and determine the guidelines and beliefs that must be followed in a mandatory manner by those who carry out tasks within the organization.

All of us who are part of Grupo Macro must know and comply with the rules, principles and values of this Code, which also contains the guidelines to prevent any violation or breach of the current laws and/or the internal rules and values of the organization.

If you have any doubts or queries,
please contact our Labor Relationship
Department inquiry line:
centroatencionrh@macro.com.ar

Law Compliance. Action Criteria.

We declare to know that all the policies, rules and proceedings issued by the entity are mandatory for all personnel. While performing our duties we must adjust our conduct to such policies, rules and proceedings, as well as to respond the instructions and suggestions we receive from our superiors, as long as they are in accordance with the rules and values of the entity.

The Group may incorporate changes any time it deems it necessary. Such changes shall be duly informed to the entire staff, explaining the nature and magnitude thereof.

In line with the above, failure to report any irregularity or non-compliance, or to cooperate with the investigation in case of a suspected violation of an internal or external rule or regulation, shall be deemed a breach of the Code of Conduct.

We commit to report any breach or non-compliance behavior, informing it to our Superior, the Human Resources Department or through the Bank's Ethics Line:
eticagrupomacro@kpmg.com.ar

Violation of any aspect of this policy is sufficient reason for the application of disciplinary sanctions that the seriousness of the same justifies.

2.4 Code of Conduct. Sworn Statement.

All of us who work at Grupo Macro have to sign the sworn statement along with its annex, entering the platform or tool made available for such purpose.

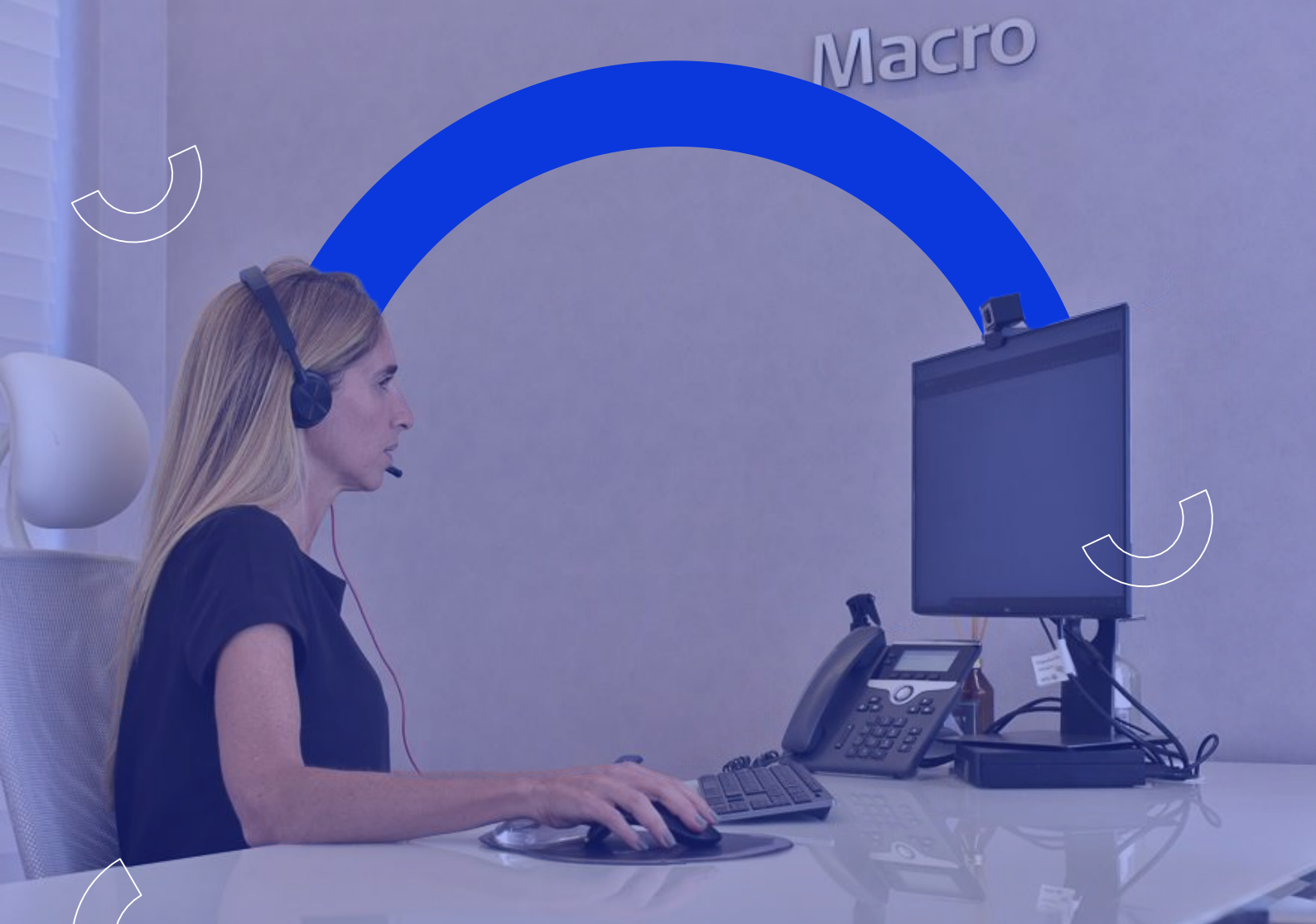
In addition, all people must know the contents of this Code and comply with it at the time of joining the company, as well as all new and updated information in connection with it, or any time the Human Resources Department shall determine.





3.

OUR ACTIONS WITHIN MACRO COMMUNITY



OUR ACTIONS WITHIN MACRO COMMUNITY

Those of us who are part of the Group will refrain from using the goods, facilities, materials, services or other resources of the company for our own benefit or that of a third party.

All the material we use for the exercise of our functions or duties is the property of Grupo Macro, and will be understood to be furnished for the sole purpose of carrying out our professional activity within the organization and not for personal benefit. It must be kept in perfect condition and returned when requested and/or in case we cease to belong to the organization for any reason.

Both the use of computer and communication tools (e-mail, stationery resources with or without the Group's letterhead, for example), are work tools provided by the entity that must be used exclusively for the tasks and functions to be carried out within the institution. We are aware that at any time the organization may access or monitor our activity and information stored in the computer tools provided by the Group.

Those of us who work at Grupo Macro declare that we are aware that any invention, patent, trademark, industrial property, information, development, created individually or as a team, in the exercise of our usual functions, will be the sole and exclusive property of the Group.

3.1 Confidential Information and Personal Data Protection.

All of us who work in the Group are responsible, both in our workplace and outside it, for maintaining professional secrecy with respect to data or information that is not in the public domain, to which we access in the exercise of our functions. Information that refers to customers, third parties or any member, even when we cease to work in the Group.

For all the above, those of us who are part of the Group must be extremely careful when, for work reasons, we must take work material or documents out of our offices.

We must also take extreme care and security measures to store documentation related to our work, either by keeping it under lock and key, protecting it with a password or encrypting it.

Under no circumstances may we disclose or use the confidential information obtained while being part of the company, for our personal benefit or advantage or that of third parties, such as for the performance of transactions with securities of Grupo Macro or its potential business partners. We do not share personal data information, unless there is a legal instance or argument that involves sending the information.

We use personal information and data exclusively to carry out our usual tasks, using only such data and information that is strictly necessary and ensuring that we are authorized to do so. We make sure that technical measures are in place to ensure an adequate level of security for data subjects at all times.

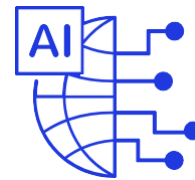
We refrain from transmitting any information about third parties to the media, since the Press Department is the only one authorized to give official information regarding Grupo Macro.

Unless expressly authorized by the entity through the President, the Commercial Banking Department and/or the Press Department, no collaborator may assume the representation of the Group by making public statements in the media on behalf of the Group, in any activity whether press, social, cultural, political or of any other kind.

3.2 Proper Treatment of Data Stored by Grupo Macro.

We undertake to use the data to which we have access as a result of our work at the Group in a responsible manner, taking care of its integrity and quality, and keeping it in shared systems of the Group and never on personal devices.

When, due to our tasks, we must provide information to members outside the organization, the convenience of doing so must always be weighed beforehand, only for work purposes and in compliance with the organization's safety regulations.



3.3 AI Tool Use.

At Grupo Macro we recognize the value and potential of artificial intelligence to improve the efficiency, accuracy, and quality of our products and services. However, we are also fully aware of the ethical and social implications surrounding their use.

Therefore, we are committed to using AI in a responsible, transparent, and respectful manner. We do not tolerate any use that violates the Group's principles of equity, privacy, security, human rights, or the Group's policies. We ensure that every implementation of AI complies with applicable laws and regulations, as well as recognized ethical standards.

3.4 Conflict of Interests. Practice or Exercise of Activities outside the Group.

As part of the organization, we refrain from participating in situations where personal, family, friendship or any other type of interests affect our objectivity or judgment in a confrontation with the interests of the Group.

Nor can we participate directly or indirectly in activities that, in general, have interests contrary to or in conflict with the Group.

We declare that we know that we cannot authorize operations that imply a risk for the entity in favor of our own interests or the interests of a family member or a related third party.

In the event that we understand there is a potential situation of conflict of interest, we shall inform our superior in accordance with the provisions of the questionnaire annexed to the "Code of Conduct", whether such situation exists at the time of the obligation to sign the document or whether it is supervening.

We may carry out professional activities unrelated to those carried out in the Group, provided that they are compatible with the tasks for which we have been hired, and do not imply a conflict of interest or are detrimental to our work performance at the Group. Such activities must be communicated, at the time of the beginning of the employment relationship, to the Human Resources Department, and also be disclosed in the annex to the Group's "Code of Conduct", or subsequently, if such activities start after the employment relationship has begun.

3.5 Creation of Guarantees-Loans-Deposits.

All of us who are part of the Group declare that we are aware that we cannot grant guarantees or loans with our own resources to any customer or supplier, except to our direct family or purchase debt in financial instruments publicly and legally negotiated.

We may, however, apply to open an account at another financial entity on the same terms and conditions as those usually offered by that entity for the open market, and we may only receive loans from an immediate family member or other financial entity on the same terms as those offered by that entity to the general public.

3.6 Open Market Investments.

The members of the Group may invest in the OTC market provided that the agreed price corresponds to the market value, and that no confidential information has been used to carry out the transaction, and the investment must not exceed 5% (five percent of the total outstanding shares).

We also undertake not to disclose confidential information to third parties or advise third parties, whether customers or not, regarding stock market transactions using that information.

3.7 Use of Accounts and Transactions of Banco Macro.

All the people of the Group are aware that the benefits associated with banking products that our entity grants us may not be purchased for the benefit of third parties, family members or for commercial purposes or related to operations or activities, which may generate a conflict of interest in relation to our tasks within the organization.

We are extremely careful with the business relationships we establish with our customers, keeping them within the corporate framework. In this sense, in no case can we:

- Channel customer transactions through our personal accounts.
- Invest in fixed-term deposits of customers, except in the cases in which the holders of such deposits have a proven family-based relationship with the employee/collaborator.
- Operate customer safe deposit boxes or facilitate the use of our own safe deposit boxes.

Our status of "collaborator of Grupo Macro" does not exempt us from compliance with the policies, standards and controls in force, applicable to the client portfolio in general and to the prevention of money laundering in particular.

3.8 Business Relationships.

In the administration of our personal assets, those of us who are part of the Group, avoid any situation that may generate conflicts of interest. Taking into account this parameter, we cannot establish business relationships of any kind personally or on behalf of customers or service providers linked to the Group.

In this regard, we undertake to purchase any necessary equipment, supplies or services on the basis of quality, utility and price offered by the supplier. Under no circumstances will we give preferential treatment to customers in negotiations with suppliers, or in transactions involving Group purchases.

3.9 Anti-corruption Policies.

Our institution defined anti-corruption policies, based on the Law on Criminal Liability of Legal Entities (No. 27,401), the Foreign Corrupt Practices Act (FCPA), and the recommendations issued by the OECD. Likewise, it adheres to the terms of the Law on Ethics for Government Officials and Employees.

Under these guidelines, the Board of Directors of our entity establishes that those of us who work in it may not make any kind of payment, gift, job offer, or offer a preferential treatment or benefit, directly or indirectly, to employees, managers or administrators of other companies or entities, public or private, in order to obtain a benefit for the organization, as a result of the acquisition of products, services and/or the purchase and sale of goods, or related to asserting influence in such negotiations.

The situations covered by this definition are the follows:

- *Giving or offering gifts for a person to do, delay, or omit to do something related to his or her duties.*
- *Demanding or making a person pay a contribution, and/or also charging more than what he or she is entitled to.*
- *Giving or offering gifts for a person to improperly assert his or her influence before a government official, a judicial magistrate, a member of the Public Prosecutor's Office, or any other person.*

In the event that a courtesy gift is made to members of other organizations, government officials on behalf of Grupo Macro, it must be previously authorized by the "Human Resources Department" and by the "Compliance Department", and be duly substantiated, taking into account the principles and business strategies of the organization.

3.10 Acceptance of Gifts and Invitations from Third Parties.

Those of us who work in the organization are aware and know that we must act with transparency, ethics and adherence both to the internal rules and to the applicable laws. In this sense, we know that we cannot accept, request, offer, promise directly or indirectly anything of value that could influence the way we perform as collaborators of Grupo Macro.

Cash or any value of any type or denomination (foreign currency, securities, shares, cryptocurrencies, etc.), cannot be considered an acceptable gift, so it is forbidden to receive them for those of us who work at Grupo Macro. The mere offering of such a gift must be brought to the attention of Human Resources and Compliance.

In the event the gift cannot be rejected for protocol reasons, we must send it to the Human Resources Department to be raffled among the employees or donated to charitable organizations.

People who are part of the Group can accept:

- *Promotional objects of low value, up to the equivalent in pesos of US\$150 (US dollars) taking into account the official rate of exchange at the time of acceptance of the gift.*
- *Customary invitations that do not exceed the limits deemed reasonable in customary, social and courtesy uses.*
- *Occasional token gifts for specific and exceptional reasons (such as Christmas gifts), as long as they are not in money or other type of value, and the value of which is less than or the equivalent of pesos US\$150 (thirty US dollars), taking into account the official rate of exchange at the time of receipt thereof.*

Invitations or tickets to sports, cultural or commercial promotion events sponsored by Grupo Macro or its suppliers, or potential suppliers, to the extent that a general procedure is identified for access to these benefits, and provided that it favors the commercial relations of the organization, allowing the possibility of expanding the Group's business opportunities.

Gifts and courtesy gifts made by customers, suppliers or third parties to direct relatives of any collaborator at the latter's indication, shall be subject to the same limits and parameters as those set out in this section.



3.11 Sending Gifts to Government Officials.

Those of us who are part of the Grupo Macro community, taking into account the provisions of Law No. 25,188 on "Public Ethics", before making any gift or donation to Public Officials in hierarchical positions, must consult with the Compliance Sector about the convenience or possible violation of the regulations in force on the matter.

3.12. Expense Policy.

As part of the Macro community, we work towards an efficient management of the Group's resources, taking into account that when expenses or disbursements must be made or authorized due to the professional activity in the entity, such expenses or disbursements must be reasonable, proportionate, commensurate with a lawful activity and justified for the achievement of the Group's commercial goals, and all documentation justifying such disbursement must be kept for proper accounting.

3.13 Bank Records and Accounting Entries.

We know that we must carry out our tasks in a clear and transparent manner, so that all operations, income and expenditure are recorded in a reliable manner, without omitting or concealing information, so that the control areas can verify and check the transactions carried out. Failure to comply with this obligation may be considered serious misconduct, subject to the corresponding internal sanctions.

In this regard, the falsification or adulteration of information, authorizing signatures, records, receipts or documentation is considered a serious offense.

Any person who executes transactions (e.g., collections, payments, etc.) or operations (e.g., purchases, sales, service installations, etc.) without being duly authorized to do so, or who acts fraudulently towards the company, shall be liable to severe sanctions or penalties.

3.14 Private Property.

Any inventions, patents, trademarks, intellectual property, business secrets and developments applied or created individually or jointly, inherent to ordinary staff duties, shall be the sole and exclusive property of the Group, regardless of their application.

3.15 Use of Group's Resources and Facilities.

All of us who are collaborators of Grupo Macro know that the resources assigned are only for business purposes, and to be used in the development of our tasks, and cannot be used for personal benefit. In this sense, it is strictly forbidden:

To use on behalf of the Group its resources or facilities for personal use or that of third parties.

To copy, sell and/or distribute software, either on the computer assigned for use at the Group's facilities, or in the resources provided for the development of our tasks remotely.

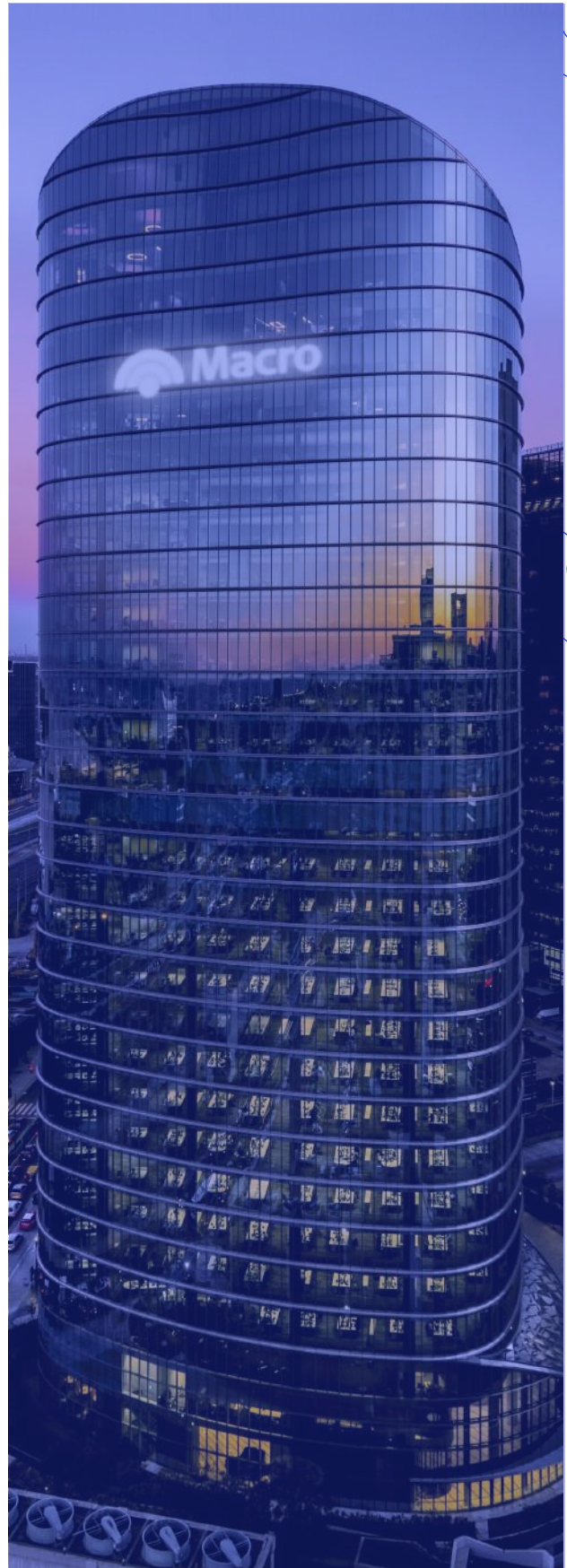
Failure to comply with these prohibitions constitutes a serious violation of licensing agreements and copyright law.

The assigned computer devices and tools, including institutional email, are considered work tools that should only be used for work purposes.

Individuals are responsible for properly maintaining the Group's resources and assets, and for taking the necessary precautions to preserve them against possible threats of a natural, human or technical nature (unauthorized use, fraud, sabotage, espionage, fire, robbery, theft, etc.) regardless of the means used, the environments in which processing takes place and the products or platforms that support the operations.

The Group expects maximum cooperation from us to provide an adequate image, both in terms of personal aspects and the care and order of the offices.

Collections, raffles, sales and/or promotion of items are not allowed. Nor any action that is foreign to the functions assigned within the organization.



3.16. Prohibition of Alcoholic Beverages and Unauthorized Drugs.

We may not consume alcoholic beverages, use unauthorized drugs or be under the influence of them, in or out of the premises, when we are performing our tasks or representing the Group.

3.17 Obligation to Collaborate.

In order to comply with and prevent any inconvenience to the development of the business, Grupo Macro monitors and supervises the activity carried out by its collaborators, through the work tools provided to them, and may request their authorization or collaboration at any time.

As members of the Group, we must avoid malicious practices or inappropriate behavior that may cause severe security breaches, such as the use of unauthorized software, non-compliance by technical users, or information leakage.

Cybersecurity is the responsibility of everyone in the Group. We can consult our Cybersecurity Policy, which indicates the proper use of computer systems and information technologies. Or, in the event of any situation or concern, we contact the Computer Security department or the Code of Conduct help line (cumplimiento@macro.com.ar).

3.18 Principles of Social Interaction. Social Media Activity.

We must be careful of the implications of our eventual participation in matters related to Grupo Macro on social networks, adjusting our behavior in such spaces to the provisions of this regulation.

In this sense, any participation in social networks related to issues that affect or may affect the image or activities of the organization, must be carried out in a responsible and precise manner, respecting the obligation of confidentiality and loyalty that we have with the Group and customers, avoiding pronouncing ourselves through defamatory or harassing messages, or in violation of the regulations in force on the matter. The misuse of social networks can have a reputational and cybersecurity impact on our company. Any official communication or disclosure, as well as interaction with the media, must be made through the Group's press department, and no employee may issue any official statement without prior authorization.

In the event of issuing opinions or interacting on social networks on non-work issues, we must use exclusively our personal email and our social networks, making it clear that opinions and interventions are in a personal capacity and not in the name and representation of the company.

Those of us who are members of the organization may not disseminate or make available images, logos or any other type of visual element related to the work environment and/or the work group, unless we have the relevant authorization from HR. It is clarified that collaborators can share and recommend all the information that Grupo Macro publishes institutionally in its profiles, photos, institutional videos on the Group's social networks, to the extent that they do not violate current legal regulations and the use policies of the respective networks.





3.19 Institutional Representation of the Group.

Except for personnel authorised by the President's Office or the Press Department of the organization, no collaborator may assume the representation of the Group in academic, journalistic, political, social, cultural or any other activities, nor make statements in the public media in the name of the Group or on its behalf. All press requests must be channeled through the Press Department.

3.20 Professional Advice. Recommendations.

Those of us who work at Grupo Macro take special care during the development of tasks when providing information. In this regard, we know that we must refrain from providing advice or information that could be construed as a financial or tax opinion, unless it is inherent to our function. We must not provide recommendations to professionals or persons who offer services that are similar, equal or related to the institution's business, with the exception of those who are expressly authorized to be members of committees on behalf of the Group.

3.21 Audits and Investigations.

All collaborators must cooperate fully with internal and external auditors or internal investigation instructors, disclosing all necessary and relevant information for the purpose of the investigation. The omission or concealment of information or documentation may be considered a serious offense and may be subject to sanctions. In case of receiving information requests from audits or external entities, we must channel them through the person in charge of the corresponding department.



3.22 Anti-money Laundering

Those of us who are part of Macro Group are aware of the entity's express commitment to actively fight the carrying out of financial operations with resources of illicit origin. In this context, both the Bank and its subsidiaries have a permanent institutional policy of rejecting any operation or activity linked to operations with resources that may come from or be linked to criminal acts.

It is the Group's policy to maintain a close relationship with its customers that allows it to provide them with an excellent quality service and to know their activities, in order to guarantee sound banking practices and compliance with the legal framework in force. All the Group's employees are aware that we must strictly adhere to current legislation regarding the registration of transactions, identification and "know the customer", and the actions to be taken in the event of suspicious transactions.

In addition, we must invariably report, through the appropriate channels, all those operations that meet the requirements to be considered suspicious transactions.

3.23 Compliance with Security Standards.

All of us who work at Grupo Macro must comply with and ensure respect for all security measures that are communicated through the established internal communication channels.

3.24. Internal Control Regulations.


We are committed to efficiently using the guidelines and procedures of the internal control system.

Internal Control System is understood to be the organizational plan and the coordinated set of methods and measures adopted within the Institution, to safeguard its assets, verify the accuracy and reliability of information, promote operational efficiency and encourage adherence to the policies provided for by the Management of Grupo Macro.

3.24.1 Collaborators with Supervisory Functions.

Those who exercise supervisory functions in each Branch or in Central Areas must apply the following principles of Internal Control:

- *Delegate functions, but maintain responsibility for their fulfillment.*
- *Grant the necessary authority for the exercise of the delegated functions.*
- *Delineate the responsibilities of all personnel under their charge.*
- *Separate functions in such a way that no single individual can commit fraud and cover it up.*
- *Apply a reasonable rotation of functions, which allows the training of personnel and contributes to the detection of errors or irregularities.*
- *Carry out comprehensive controls that allow them to determine and alert on shortages, imputation errors, regulatory non-compliances or other types of relevant events, when assuming a new role.*
- *Enforce compulsory licensing rules.*
- *Enforce the reading of internal communications by notifying all personnel under their responsibility, as well as train and require training on issues related to their activity.*
- *Passwords, entry cards and other elements, the manipulation of which poses a potential risk, must be sufficiently protected so that those who are not authorized do not have access to them.*
- *The handling of cash and securities must be reserved exclusively for tellers or expressly authorized personnel.*
- *The critical forms, debit cards, credit cards, pins and guarantees received must have sufficient controls to allow, at all times, their location, and an adequate separation of functions must be implemented to prevent their use or handling by unauthorized third parties. Carry out periodic and surprise counts, and, if shortages are detected, take immediate actions aimed at regularizing them.*
- *Carry out balances and audits of the accounting accounts that are under their responsibility. They must be executed by personnel independent of those who operate the area and the result of such balances or audits must be reliably recorded. In the event of differences, immediately adopt the corresponding measures for their regularization.*
- *Exercise sample and non-routine controls, to evaluate whether existing controls act in the way they were created, alerting about the changes implemented in order to evaluate such changes and update the relevant process.*
- *Certify that the controls implemented allow for the prevention, detection and notification of unusual operations, otherwise warn about their inefficiency.*
- *Ensure that the vouchers, receipts or slips issued for any concept contain all relevant information, i.e.: operation description; date; amount; account; sector of origin and affected sector, and that the same are signed by those who prepare, supervise and authorize them.*
- *Control that all entries and transactions processed are carried out under the causes designed for this purpose, responding to the concept that gives rise to them.*



Ensure the inalterability and conservation of the records and documentation of all kinds that are under their responsibility, as well as their proper sending to the entity's general archive.

Ensure the reliability, confidentiality, integrity, accuracy and availability of the information and the application environment that supports it, through controls in computer systems and related technologies.

Information Asset Owners, Delegates, and Custodians are responsible for security management, infrastructure management, procurement, and maintenance of assigned information assets.

Properly use the electronic and computer devices provided by the entity and/or those of their own, authorized for use in the corporate environment, in such a way as not to jeopardize the confidentiality, integrity and availability of the entity's information, including cell phones, notebooks, PCs, etc.

Communicate to the higher control levels about the inappropriate use of the Internet and social networks that may be carried out by employees of the organization, to the extent that such inappropriate use may pose security or reputational risks.

Communicate in a reliable and timely manner to the higher levels and those responsible for risk management, the needs, inconveniences or events that prevent adequate compliance with Internal Control principles.



3.25 Public and/or Private Procurement.

This section includes minimum measures that employees must take into account with respect to public and/or private procurement, as an additional control mechanism that contributes to mitigating the risks associated with crimes of corruption and bribery, among others. These measures must be complied with by all of us who are part of the Group, whether or not we participate in the respective contracting.



3.25.1 Public Sector Relations.

In the context of the Group's commitment to business ethics and corporate responsibility, it is the company's internal policy to generate an environment of control prior to and during the term of public procurement, in charge of the department manager who is analyzing the participation in the business, complying with the following guidelines:

Observe the integrity of contacts with officials representing the public sector, paying special attention to conduct that is inappropriate.

Prohibit, in accordance with the provisions of the Code of Conduct, the delivery or receipt of any type of value given with the purpose of influencing any act or decision generated so that Banco Macro S.A. or any of the companies of Grupo Macro obtains or retains a contract for its benefit.

Prohibit any type of agreement between companies to distort due competition in public procurement.

3.25.2 Relationships with Third Parties or Business Partners, including Suppliers, Distributors, Service Providers, Agents and Intermediaries.

In order to generate control over the integrity and record of any third parties to be hired by the company, those who intervene in the hiring, procurement and/or selection process must be extremely careful in the verification and compliance by them, in the respect and compliance with the applicable legal regulations, as well as respect for the rules that make up this Code of Conduct, and the practice of: social responsibility, respect for human rights and environmental sustainability. They must maintain an ethical commitment, act with honesty and integrity in all their contacts and business relationships, with public and/or private entities in any country in which they operate.

The persons in charge of the process of selection, contracting and registration of suppliers or intermediaries must follow the internal rules assigned to the Administration and Payment to Suppliers department.



OUR RELATIONSHIP WITH MACRO TEAM



OUR RELATIONSHIP WITH MACRO TEAM

The rules and procedures issued by the Group were created to achieve the goals of the financial business, and to promote the correct treatment of all members of the Community that we are part of, in a pleasant and healthy work environment.

Taking into account the above, we are all aware of our responsibility to contribute to the creation of this environment, based on the Group's values and principles (Protagonism–Agility–Closeness and Pride), avoiding any intimidating, hostile, humiliating or offensive behavior.

Those of us who exercise leadership functions are committed to perform our duties responsibly and in a clear and proactive manner, promoting the development of all the team members under our charge, taking into account the principles of diversity and inclusion, both for their evaluation and for job promotion.

4.1. Respect and Inclusion.

Grupo Macro prioritizes the creation of a work context and climate where all people feel welcome and are relate by promoting human dignity, in a climate of respect and inclusion, fostering and valuing the diversity that enriches us.

In this sense, we are aware of the importance of inclusive behaviors, knowing how to listen and respect the different perspectives of all people.

We do not accept any form of discrimination, harassment or intimidation, direct or symbolic which, based on gender; gender identity and expression; disability; ethnic group; age; origin; nationality; health condition; religion; sexual preference; language; politics; socioeconomic status or otherwise, violates the Group's policies, whether on the part of an officer, supervisor, peer, customer, supplier or any of them.

We consider any discrimination based on biases, stereotypes or preconceptions to be unacceptable, and both superiors and collaborators must provide equal treatment in identical situations.

In case of becoming aware of discriminatory, exclusionary, harassing or intimidating conduct, we have the obligation to report such circumstance through the ethics line or reporting channel (eticagrupomacro@kpmg.com.ar) or by telephone: 0800 - 122 - 5768. This means of reporting is secure and confidential, and anonymously if we prefer.

We are all responsible for avoiding any conduct that may create an unpleasant, hostile, or offensive work environment.

We consider it inadmissible to show violent behavior that does not respect the rights of people in the teams, customers, suppliers or is disrespectful.

4.2 Sanctioning Conducts considered to be Harassment or Intimidation.

The people of Grupo Macro must refrain from discriminating, harassing or persecuting in any way anyone within the organization.


We consider harassment to be any form of physical or psychological intimidation, which causes psychological harm to people, perpetrated through any means (verbal, gestural or virtual harassment - the latter through email, text messages or in any other way).





5.

**OUR RELATIONSHIP
WITH THE COMMUNITY**



5.1 Commitment to fighting and preventing crimes committed in the field of financial business.

It is public knowledge that criminal organizations use the services offered by the banking sector to commit illegal acts, either for transactions in the country or abroad.

Banco Macro and all its related companies are fully committed to conducting their businesses by fighting corruption, money laundering and financing of terrorism, all in accordance with the regulations in force on the matter (Criminal Code, Law 25,246, Law 26,268, among others), adhering to the main standards and good practices of transparency and responsibility both for its acts at the national and international level.

Those of us who are part of the Group are extremely careful in the handling, transmission and information to customers and third parties that could be used for a criminal purpose.

To this end, we undertake to comply with the meticulous analysis of all the documentation submitted by customers, together with the subscription of all the documents required by internal regulations, in order to be able to activate the products requested, as well as to report to Compliance any unusual behavior and/or suspicious transaction.




5.2 Commitment to Sustainable Management.

Grupo Macro is committed to running its business in a manner so as to minimize the environmental impact that its activity could cause, directly or indirectly. We promote the responsible use of natural resources in order to minimize environmental impact, measuring and disseminating the work carried out through annual sustainability reports, where the Group accounts for its economic, social and environmental performance.

We responsibly manage technological waste, plastics and paper, considering both parts inseparable and essential for proper business management, going deeper into the analysis of environmental and social risks.

We are responsible for the management and efficient use of the resources granted, in order to reduce the environmental impact to minimum levels and in an environmentally friendly manner.



5.3 Social Commitment. Participation in Social or Charity Actions.

The Group, through different actions and programs, is committed to promoting banking penetration and focusing on lower-income sectors, adjusting its commercial offerings and developing a financial education program open to the community and of national reach.

Teams are invited to participate in these actions, as long as it is compatible with the activities carried out in the organization.


5.4 Political Neutrality.

Individually, we have the right to freely support or participate in political activities outside the organization and working hours, which in no way may involve the Group that conducts its business without promoting or adhering to any particular political party.

5.5 Responsibility for People's Well-being and Inclusion. Diversity and Pluralism.

Within the organization we must act being respectful at all times of diversity and equity, building in each personal relationship with different audiences, bonds that value human rights and the dignity of all people.

Taking into account the above, those who participate in processes of search, selection and promotion of personnel to occupy positions within the organization, actively commit themselves to do so, taking into account the diversity and pluralism that must govern our relationships, promoting at all times equal opportunities and access, without bias, creating independence.





6.

**ETHICS & COMPLIANCE
COMMITTEE**



ETHICS & COMPLIANCE COMMITTEE

The Ethics and Compliance Committee has the function of ensuring that the company has adequate means to promote appropriate decision-making, in compliance with internal and external regulations.

The Ethics and Compliance Committee will be informed of any significant deviation that arises from internal and/or external regulations, coordinating in this area, the execution of the action plans necessary to address and correct such deviations. In this area, the Committee is responsible for the Ethics Line and the handling of any complaints that come in.

