- Banco Patagonia coordinates the necessary mechanisms and controls to prevent the Bank from being used for Money Laundering and Terrorist Financing. It also coordinates the implementation of internal standards or procedures to ensure compliance with regulations issued by different oversight bodies (UIF, BCRA, CNV).
- 2. Banco Patagonia participates in the Financial System as a Regulated Entity and makes best efforts to apply current regulations to prevent and combat money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption, or other illicit.
- 3. Banco Patagonia acts in accordance with the regulations of the Financial Information Unit, the Central Bank of the Argentine Republic, the FATF standards, and United Nations Resolutions to prevent and combat Money Laundering, Terrorist Financing, bribery, extortion, corruption, and the financing of the proliferation of weapons of mass destruction
- 4. Banco Patagonia adopts a customer identification and knowledge policy, whose minimum content complies with Articles 20 bis, 21(a), and 21 bis of Law No. 25.246 and its amendments, Decree No. 290/2007 and its amendments, and current resolutions of the Financial Information Unit, considering the particularities of each client and product.
- 5. Banco Patagonia adopts procedures in the relationship with public entities, to inhibit the practice of acts of corruption.
- 6. Banco Patagonia practices and controls to prevent and combat money laundering and the financing of terrorism in line with the Wolfsberg Group's principles for correspondent banking.
- 7. Banco Patagonia uses parameters established by law for registering transactions and identifying those considered indications of money laundering, terrorism financing or financing of the proliferation of weapons of mass destruction, in the development of automated systems for monitoring transactions performed.
- 8. Banco Patagonia adopts monitoring procedures for operations with Public Entities clients to prevent the Bank from being used in Money Laundering, Terrorist Financing, or corruption processes.
- Banco Patagonia keeps records related to the procedures of preventing and combating money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption in compliance with the legislation in force.
- 10. Banco Patagonia adopts adopt procedures in the development of products and services to inhibit their use for unlawful practices related to money laundering, the financing of terrorism, the financing of the proliferation of

- weapons of mass destruction and corruption To this end, the Anti-Money Laundering, Operational Risk, and Compliance areas are necessary participants in the development of new products.
- 11. Banco Patagonia conducts internal risk assessment to identify and measure the risk of using its products and services for illicit practices such as money laundering, terrorism financing, the financing the proliferation of weapons of mass destruction, and corruption. This assessment is made for each of its business lines to determine the risk profile of the entity, the level of inherent exposure, and to evaluate the effectiveness of the controls implemented to mitigate risks related to its customers, products and/or services, distribution channels, geographical areas, use of new technologies, and activities carried out by employees, business partners, and external service providers. This entire process is subject to the approval of the Board of Directors.
- 12. Banco Patagonia requires the application of the "Know Your Customer" policy as an essential condition to initiate or continue the business or contractual relationship with the client, aiming to avoid any connection with fictitious or unidentified account holders.
- 13. In analysing the operations, Banco Patagonia assesses the instruments used, the way they are performed, the frequency, the parties and amounts involved, the customer's financial capacity and economic activity, and any indication of irregularity or illegality involving the customer or its operations, for the purpose of detecting signs of money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction or corruption.
- 14. Banco Patagonia conditions the initiation and maintenance of business relationships with customers who are Politically Exposed Persons on the authorization of the Anti-Money Laundering and Terrorist Financing Prevention Committee.
- 15. Banco Patagonia adopts due diligence procedures to mitigate the risks of money laundering, terrorist financing, the financing of the proliferation of weapons of mass destruction and corruption, according to the activity, jurisdiction and agents involved.
- 16. Banco Patagonia adopts restrictive measures regarding g doing business and maintaining business relationships with customers when circumstances reveal evidence of involvement in acts related to money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction or corruption, in compliance with the legislation in force.
- 17. Banco Patagonia conditions the maintenance of correspondence relations with other banks to the existence, in the scope of those banks, of mechanisms to prevent money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction.
- 18. When maintaining business relationships with partners and suppliers, Banco Patagonia considers the existence, within the scope of these third parties, of mechanisms to prevent corruption.

- 19. Banco Patagonia adopts procedures to monitor the process of preventing and combating money laundering, terrorist financing financing of the proliferation of weapons of mass destruction by senior management, ensuring its commitment to the effectiveness and continuous improvement of the policy, procedures, and internal controls required, by the Board of Directors.
- 20. Banco Patagonia maintains specific channels for receiving complaints, including anonymous ones.
- 21. Banco Patagonia duly notes indicators or reports of corruption by direct agents or third parties, in accordance with the legislation in force..
- 22. Banco Patagonia verifies indications and reports of acts of corruption practiced by direct agents or third parties, against the assets, principles and commitments undertaken by the Bank, in accordance with the legislation in force.
- 23. Banco Patagonia conducts, in a confidential and restricted manner, the registration, analysis and communication processes of financial operations with signs of money laundering, the financing of terrorism or the financing of the proliferation of weapons of mass destruction to the competent authorities, including in relation to customers, as well as the processes related to the investigation of suspected acts of corruption.
- 24. Banco Patagonia preserves the identity of the whistleblowers as anonymous.
- 25. Banco Patagonia repudiates any act of retaliation against good-faith whistleblowers who choose to identify themselves.
- 26. Banco Patagonia adopts measures to protect good-faith whistleblowing employees in relation to facts arising from their reports.
- 27. Banco Patagonia reports to the competent authorities regarding operations or proposed operations that, in the form of the current legislation, characterize signs of money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption
- 28. Banco Patagonia adopts criteria for hiring and employee conduct, with a focus on preventing and combating money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption.
- 29. Banco Patagonia requests its suppliers adopt criteria for hiring and monitoring employee conduct, with a focus on preventing and combating money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption.

- 30. Banco Patagonia maintains a specific employee training program on preventing and combating money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption.
- 31. Banco Patagonia requests that the bank correspondents who provide services to the Bank carry out training in preventing and combating money laundering and the financing of terrorism.
- 32. Banco Patagonia annually submits the process of preventing and combating money laundering and the financing of terrorism, financing of the proliferation of weapons of mass destruction, and corruption; as well as its Integrity program, to an Independent External Auditor, which must be approved by the Board of Directors on an annual basis.
- 33. Banco Patagonia establishes that Politically Exposed Persons (PEPs) registered in its systems—whether through marking against Public Databases or by signing the client's affidavit —will remain active until two years after ceasing the function that gave rise to their status, or until the client informs the Bank that two years have passed since their termination.
- 34. Banco Patagonia maintains a policy of not establishing any kind of business relationship with entities classified as "Shell Banks" or "Ghost Banks."
- 35. Banco Patagonia participates in joint actions, within the scope of the National Financial System, to prevent and combat money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption. through contribution and collaboration in meetings called by the regulator and overseers.
- 36. Banco Patagonia prevents prevent money laundering, the financing of terrorism, the financing of the proliferation of weapons of mass destruction and corruption practices in doing business in accordance with the national legislation and with the legislation of transnational scope.
- 37. Banco Patagonia exchanges information between control areas to comply with regulatory obligations, adhering to the guidelines established by the Information and Cybersecurity Security Policy and the confidentiality provisions set out in the regulations for Prevention of Money Laundering and Terrorist Financing.
- 38. Banco Patagonia does not maintain relationships nor conduct financial transactions with designated entities or individuals. Additionally takes timely and discreet steps to make the assets of natural and legal persons sanctioned by the United Nations Security Council unavailable.