

Prevention and Safety Culture Policy



Process Summary Sheet

1. Name of the Process.

Prevention and Safety Culture Policy.

2. Process Goal.

To set forth guidelines for the Prevention and Safety Culture Department on safeguarding the life and integrity of employees and customers, as well as the property and environment of Grupo Financiero Banorte, and thus to comply with the laws, rules and regulations issued by the various regulatory authorities on the matter, through a Prevention and Safety Culture Policy.

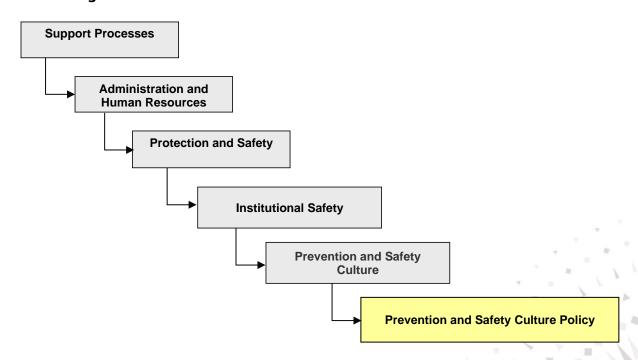
3. Scope.

Areas	This policy applies in general to all companies, stakeholders and other subsidiaries and
Aleas	affiliates that use the physical facilities of Grupo Financiero Banorte's properties.

4. Process path.

Support Processes / Administration and Human Resources / Protection and Safety / Institutional Safety / Prevention and Safety Culture / Prevention and Safety Culture Policy.

5. Hierarchical diagram.





6. Associated General Policies.

- Prevention Policy and Safety Culture.
- Banorte Protectors recruitment and training program (under development).
- Political Constitution of the United Mexican States.
- General Civil Protection Law.
- Regulation of the General Civil Protection Law.
- Internal Labor Regulations.
- Federal Labor Law.
- General Regulations for Labor Inspection and Application of Sanctions.
- Federal Regulation on Safety and Health at Work.
- Official Mexican Standards (NOM).
- General Corporate Communications Policy.

7. Annexes associated with the process.

- 1. Banorte Protectors signup / registration form.
- 2. Civil Protection Risk Analysis.



Policy

1. Name of the Policy

Prevention and Safety Culture Policy.

2. Scope

This policy applies in general to all companies using the physical facilities of GFNorte properties.

3. Content of the Policy:

1. Regulatory Framework:

- A. Section A, Subsection XXXI, Paragraph 22 of the Political Constitution of the United Mexican States, Article 123 reads: "the application of labor laws corresponds to the authorities of the federal entities of their respective jurisdictions, but in matters related to banking and credit services, it is the exclusive competence of the federal authorities."
- B. **Article 40** of the **General Civil Protection Law** mentions that: "All properties and fixed and mobile facilities of agencies, entities, institutions, organizations, industries or companies belonging to the public, private and social sectors, referred to in the Regulations of this Law, must have an Internal Civil Protection Program."
- C. Article 75 of the Regulations of the General Civil Protection Law establishes that such Internal Civil Protection Programs (ICPP): "must be in writing and contain the identification of risks and their evaluation, the actions and measures necessary for their prevention and control, as well as self-protection measures and other actions to be taken in the event of an accident, emergency or disaster."
 Furthermore, Article 79 states that: "Each Internal Civil Protection Unit must establish a training program to ensure the continuous theoretical and practical training of personnel assigned to the ICPP, establishing systems or forms of verification that such knowledge has been acquired."
- D. **Article 16, numeral II** of GFBanorte's **Internal Labor Regulations**, states that: "Preferably during the workday, practical first aid courses will be given to personnel in those departments or branches where given the nature of the work they perform, they may be susceptible to accidents." Employees who perform tasks in which such instruction is necessary will also be instructed on firefighting maneuvers so that they are prepared for any



emergency; likewise, **numeral IX** of the aforementioned article, states that: "the personnel appointed by the company and/or those who register voluntarily, must actively participate in the formation of the Joint Safety and Hygiene Committee, as well as in the Mixed Regional Subcommittees."

- E. GFBanorte's **Internal Labor Regulations**, **Article 21**: "To actively and voluntarily participate in the formation of brigades to form internal civil protection units, attend training programs on the subject and participate in evacuation programs and drills and/or simulations that the company conducts as required by the competent authorities."
- F. Article 134 of the Federal Labor Law, mentions obligations pertaining to workers, including, in numeral II, "to observe the provisions contained in the regulations and the official Mexican standards on safety, health and work environment, as well as those indicated by the employers for their personal safety and protection;" and in numeral VIII, "to provide assistance whenever necessary, especially in the event of an accident or imminent risk to human safety or to the interests of the employer or coworkers."
- G. Article 12 of the General Regulations for Labor Inspection and Application of Sanctions establishes that "all workplaces will be subject to oversight and compelled to comply with labor laws, in accordance with the competence of each of the labor authorities, and worker placement agencies, in accordance with the inspection programs. The oversight and enforcement of labor regulations in the work centers, will be carried out through inspections or alternative mechanisms."
- H. Article 7 of the Federal Occupational Safety and Health Regulations establishes employers' obligation "to form and include a Safety and Hygiene Committee within their workplace, and to provide the necessary facilities for its operation." Article 8 of the same Regulations outlines workers' responsibilities, including "compliance with the preventive safety and health measures set out in these Regulations and in applicable Standards, as well as those established by their employer to prevent workplace risks." Additionally, workers are required to participate in "emergency response brigades when applicable, and to take part in any training or instruction related to risk prevention and emergency response provided by the employer or those the employer designates."
- I. The Official Mexican Standards (NOM) regarding safety provide a set of "mandatory technical regulations issued by the competent agencies, which are intended to establish the characteristics that processes or services must meet when they may constitute a risk to the safety of



persons or harm human health; as well as those related to terminology and to their compliance and application, including, among others:

- NOM-002-STPS-2010, Safety conditions—Fire prevention and protection in the workplace, Number 6.3, states that workers must "participate in the training activities provided by the employer for the prevention and protection against fire."
- 2. Number 5.1 of **NOM STPS 19**, Constitution, Incorporation, Organization and Operation of the Safety and Hygiene Committees, states employers' obligation "to form and incorporate at least one committee in the work center," while number 6.2 establishes that workers must "participate as members of the committee, when appointed."
- Number 4.8 of NOM-030-STPS-2009, Preventive occupational health and safety service—functions and
 activities (dof.gob.mx) stipulates that employers must train employees who participate in preventive
 occupational health and safety services.

2. Mission.

A. To physically safeguard the employees, customers, users, assets and facilities of Grupo Financiero Banorte (GFB) through an active culture of prevention.

3. Vision.

A. To encourage and coordinate the establishment of policies and actions aimed at comprehensive risk management with the committed participation and shared responsibility of employees, making use of the material, human and technological resources necessary and acting in a proactive, efficient and timely manner.

4. Activities of the Prevention and Safety Culture Department.

- A. GFB, through its Civil Protection Prevention and Safety Culture Department, is responsible for:
 - Compliance with national regulations on civil protection matters, whether federal, state, municipal, Official Standards (NOM), Reference Standards (NMX), technical standards or any others issued by any governmental institution.
 - Establishing alliances through working groups / activities in coordination with internal areas of GFB, with public and private institutions, non-profit organizations, research or academic centers dedicated to prevention, safety or civil protection, in order to promote the culture of comprehensive risk management.



- Coordinating the registration of the Internal Civil Protection Programs (ICPP) with the corresponding authorities.
- 4. Establishing work groups / activities by internal areas of GFB to coordinate the development of a "Banorte Protectors Program" whose mission is to promote a culture of prevention and civil protection, in order to avoid risks and to know how to act in case of emergencies.
- 5. Exercising oversight to detect anomalies within the properties and physical facilities that put employees, clients, customers, users, property or GFB assets at risk.
- 6. Conducting a risk analysis that examines the threats to which GFB employees, customers, clients, users, goods or assets are exposed.
- Developing first-response protocols for a variety of disruptive natural or anthropogenic phenomena in accordance with the risk analysis of each property; providing first response to phenomena that directly impact GFB employees, customers, users, visitors, property or assets.
- 8. Conducting drills to prepare for various scenarios (earthquake, fire, bomb threat, among others).
- 9. Promoting a culture of prevention and civil protection within the organization, through events or talks; creation of infographics or visual elements; and organizing activities that bring employees together and encourage them to take an active part in prevention.
- Ensuring the operational availability and functioning of emergency response equipment (automatic defibrillator (AED), self-contained breathing apparatus, fire cabinet and others).
- 11. Analyzing emergency or disaster situations affecting the country in order to assess the scope of the impact and make the necessary recommendations to protect employees, clients, customers, users, visitors, property, assets and the environment of GFB.
- 12. Promoting inclusion and equality for people with disabilities and ensuring the accessibility of GFB's facilities (to employees, customers, users, visitors, contractors).
- Assembling the information required by the Ministry of Labor and Social Welfare for inspections of GFB properties.
- 14. Attending to the inspection visits by personnel from the Ministry of Labor and Social Welfare and providing whatever information or documentation that this labor authority requires.
- 15. Fostering an organizational climate that favors occupational health and safety, minimizing the risks to which employees are exposed in their workplaces, as established in the following Mexican Official Standards:
 - a. NOM-030-STPS-2009, Preventive Occupational Health and Safety Services—Functions and activities.
 - NOM STPS 19, Constitution, Incorporation, Organization and Operation of the Safety and Hygiene Committees.



- 16. Participating in the development and implementation of a global occupational health and safety system based on occupational health and Safety standards for employees.
- 17. Participating in the implementation of preventive medicine programs for employees.
- 18. Recognizing the importance of the quality of life, productivity and profitability of the employees as important as health, safety, injury and illness prevention, in accordance with the Psychosocial Risk Prevention Policy.
- 19. Employees must come first, and for this reason both employees and suppliers must respect and adhere to the established safety standards, involving them actively in the preventive culture outlined in this Policy and implemented in the institution.
- 20. Promoting continuous improvement in all areas of occupational risk prevention management.
- 21. Adhering to the GFB Social Policy, as mentioned in the Social Policy Manual.

5. Internal Civil Protection Programs.

- A. The Prevention and Safety Culture Department is responsible for assembling a file of information on the Internal Civil Protection Program for each GFB property for subsequent delivery to the corresponding authorities.
- B. Each GFB property must have an Internal Civil Protection Unit made up of Banorte Protectors.
- C. The Prevention and Safety Culture Department is responsible for coordinating the compilation of the documentation/information required by the civil protection authorities from the corresponding internal areas of GFB in accordance with the Internal Civil Protection Programs (ICPPs).
- D. Formation of the ICPPs is carried out jointly with the internal areas of GFB involved, accredited third parties and specialized service providers.

6. Safety and Hygiene.

- A. The Prevention and Safety Culture Department is responsible for:
 - 1. Forming Safety and Hygiene Committees within GFB.
 - 2. Conducting safety and hygiene inspection rounds of GFB properties.
 - 3. Compiling information on preventive and corrective maintenance of:
 - a. Electrical installations.
 - b. Air conditioning.
 - c. Fire extinguishers.
 - d. Other equipment considered pertinent by the authorities.



- 4. Inspecting compliance with the minimum safety measures necessary for the maintenance activities in hazardous areas (work at heights, energized lines, among others).
 - **Note:** The Prevention and Safety Culture Department must ascertain and document compliance by suppliers with the minimum measures necessary for the activities mentioned in point 4, above, supported, for example, by:
 - For work at heights, Mexican Official Standard NOM-009-STPS-2011, Safety conditions for working at heights. The standard includes a procedure for conformity assessment, which applies to inspections carried out by the regulatory authorities in civil protection matters, including inspection visits by accredited verification units, stating the minimum measures.
 - For energized lines, Mexican Official Standard, NOM-029-STPS-2011 Maintenance of electrical installations in work centers Safety conditions. This standard "establishes safety conditions for carrying out maintenance activities to electrical installations in workplaces." The standard establishes minimum necessary measures and emergency plans; due to their nature, these must be carried out by a specialized supplier engaged to perform this type of work. The measures are mandatory and are established to minimize risks in the activities described in the standard.
- 5. Ascertain and document, before beginning any activity, that the supplier has appropriate emergency plans to avoid accidents that may occur due to the nature of the activities mentioned in the previous numeral.

7. First response equipment and tools

- A. The Prevention and Safety Culture Department is responsible for:
 - 1. Verifying the correct operation of first response equipment and tools.
 - Scheduling maintenance, modification or replacement of portable or non-motorized wheeled mobile fire extinguishers, manually or automatically operated, which is done via e-mail through the National Reporting Desk.
 - 3. Collect from the Supplier the Letter of Responsibility / Letter of Guarantee / Letter of Good Condition, attesting to the maintenance service performed on the portable or non-motorized wheeled mobile fire extinguishers, manually or automatically operated, and guaranteeing that they are in correct physical and operating condition.
- B. The Letter of Responsibility / Letter of Guarantee / Letter of Good Condition from the supplier must also guarantee / certify compliance with the corresponding NOM Standards, as well as the recharge and maintenance dates for which the portable or non-motorized wheeled mobile fire extinguishers, manually or automatically operated are certified to remain fully functional and operable.



8. Banorte Protectors Program.

- A. The Banorte Protectors Program has been created with the goal of instilling in GFB personnel capacities for response in the event of an emergency.
- B. Each GFB department must assign personnel to participate as Banorte Protectors, taking into consideration:
 - 1. In the case of the branch network, at least 3 persons per branch, or as many as the authorities require at each branch.
 - 2. In the case of banking modules, a minimum of one to a maximum of two Banorte Protectors should be appointed.
 - 3. In corporate offices, at least 10% of the staff of each building.
- C. The Prevention and Safety Culture Department is responsible for managing the personnel assigned by each GFB department, using the tools, formats or forms established for this function.
- D. In parallel, supervisors and coordinators register new volunteers to act as Banorte Protectors using the established form (Annex 1, Banorte Protector signup/registration form) and emailing it to: protectoresbanorte@banorte.com
- E. During a state of emergency, Banorte Protectors perform the following duties:
 - 1. Operate first response equipment and tools when required.
 - 2. Give/activate alarm and use their badges (vests, radios, paddles, etc.).
 - 3. Help employees, customers, clients, users, visitors to stay calm.
 - 4. Give directions to employees, customers, clients, users, visitors.
 - 5. Provide support to employees, customers, clients, users, visitors or suppliers that require it.
 - 6. Coordinate the evacuation of the properties if necessary.
- F. Each quadrant, floor, or other unit of organization for emergency response within GFB facilities will have a floor manager and a deputy, who will be responsible for **coordinating the Banorte Protectors** in evacuations and assisting with headcounts and location of personnel when necessary.

9. Awareness, training, communication and information in Civil Protection Matters.

A. Awareness:

The Prevention and Safety Culture Department must prepare annual awareness campaigns on civil
protection, which include, among others, events and talks that promote a culture of prevention and civil
protection, and send them to the Executive Department of Corporate Communication.



Based on this proposal, the Executive Department of Corporate Communications prepares a calendar
of publications in various institutional media, in accordance with the General Policies on Corporate
Communications.

Note: This schedule is previously shared with the Safety Prevention and Culture Department.

B. Training:

- 1. The Safety Prevention and Culture Department coordinates with the Learning and Development Department to:
 - a. Organize the annual calendar for training Banorte Protectors.
 - b. Hold workshops to foster a culture of self-protection at least once a year.
 - c. Practice the use of **first response equipment and tools** with employees so that they can learn how they work properly and get to know GFB's facilities.

C. Communication and information:

The Prevention and Safety Culture Department must coordinate the activities of "Banorte Protectors
Week" together with the Culture and Climate Office, which is part of the Communication and Culture
Department, to coincide with National Civil Protection Day.

10. Civil Protection Risk Analysis

- A. The Prevention and Safety Culture Department is responsible for preparing:
 - A civil protection risk analysis (See Annex 2) for each GFB property to determine its vulnerability as
 required under NOM 02 STPS, Fire Prevention in the Workplace, and the corresponding workplace fire
 risk table. This standard measures fire risk as a factor of the built surface in square meters and
 inventories of flammable gases, flammable liquids, combustible liquids, combustible solids, pyrophoric
 or explosive materials at the property.
 - 2. A risk analysis of the surrounding establishments that, due to their activities, could be at risk in the event of an emergency.
- B. These analysis also require an assessment of surrounding risks.

11. Drills.

A. Drills must be carried to prepare for a variety of scenarios in corporate offices and Banorte Branches, based on the risk analysis indicated in the Civil Protection Risk Analysis policy.



12. Employees

- A. Employees must follow the instructions of the Banorte Protectors at all times in the event of an emergency.
- B. Employees must participate actively, responsibly and seriously in the drills conducted at GFB facilities. Failure to do so may result in a sanction ranging from a verbal admonition or, if the incident warrants it, an administrative report.
- C. The employees designated by their respective departments must participate in the emergency brigades (Banorte Protectors Program).



Annex

Annex title

01) Banorte Protectors signup / registration form

1. Image

View Document



Annex

- Annex title
 O2) Civil Protection Risk Analysis
- 2. Image

View Document



Glossary of Terms

No.	Term	Definition
1.	Automatic Defibrillator (AED's)	A lightweight portable device that delivers an electrical shock through the chest to the heart. The shock can stop irregular heartbeats (arrhythmia) and allow normal rhythm to resume after sudden cardiac arrest.
2.	Banking module	Banorte bank branches with limited services and staffing. Most of these are located within other establishments or corporate offices.
3.	Banorte Protector Program	A program for recruiting and training GFB employees in prevention and protection.
4.	Banorte Protectors	Banorte employees who have received training in civil protection and can apply this knowledge in an emergency or disaster.
5.	Bomb threat	Intention or warning of the placement of an explosive device fitted with a timer so that it may detonate at a certain time.
6.	Coordinators	For the purposes of this Policy, the term refers to the Prevention and Safety Culture Coordinators (staff from the Prevention and Safety Culture Department), who are responsible for carrying out all the necessary activities related to prevention and compliance with the different laws, rules and regulations issued by the various regulatory authorities in the area of civil protection, aimed at safeguarding the lives and integrity of employees and customers, as well as the assets and environment of GFB, in accordance with the assigned control divisions (corporate offices).
7.	Corresponding authorities	Any official body vested with certain powers by law that allow them to dictate and enforce compliance with certain laws or functions, including, among others: • Federal civil protection authorities. • State civil protection authorities. • Municipal civil protection authorities. • Federal Ministry of Labor and Social Safety.
8.	Customer	Any individual or legal entity who holds an account, uses the services provided by the companies that make up GFB, conducts



		transactions with them, or participates in the companies referred to
		in Article 124 of the Popular Savings and Credit Law.
9.	Disruptive Anthropogenic Phenomena	A disruptive event or disaster attributed to human activity.
10.	Disruptive Natural Phenomena	A disruptive event or disaster attributed to nature.
11.	Earthquake	A phenomenon produced by the sudden movement or slippage of the plates that make up the rigid covering of the planet called the Earth's crust. This produces vibrations that spread in all directions and which we perceive as a shaking or rocking with variable duration and intensity.
12.	Employees	Employees of GFB.
13.	Fire	A fire that breaks out within GFB property that is not controlled in time or space.
14.	Fire Cabinet	Cabinet where personal fire protection equipment (helmets, overalls, jackets, boots, etc.) is kept.
15.	First response equipment and tools	Personal protection equipment or tools that are used by Banorte protectors for emergency response (fire extinguishers, manual fire stations, megaphones, firefighting equipment, etc.)
16.	Grupo Financiero Banorte (GFB)	For the purposes of this Policy, the term refers to the following companies: Banco Mercantil del Norte. Arrendadora y Factor Banorte Casa de Bolsa Operadora de Fondos Banorte Almacenadora Banorte. Seguros Banorte Pensiones Banorte Banco BINEO
17.	Health and Safety Committee	A joint labor/management group organized to achieve a common purpose: to prevent occupational accidents and/or occupational ill health derived from workplace activities, by investigating the causes of occupational accidents and ill health, proposing measures to prevent them and overseeing their enforcement.



	Г	1
18.		Inspections rounds carried out by the Safety and Hygiene
		Committee to identify agents, hazardous or unsafe conditions and
	Inspection rounds	unsafe acts in the workplace; to investigate the causes of
		occupational accidents and diseases; to propose measures to
		prevent them, and to monitor their compliance.
		Grupo Financiero Banorte's internal communication networks, for
		example:
		Viva Engage
19.	Institutional media	Postcards
		Institutional e-mails
		BanorTV+
		Rumbo (Banorte WhatsApp account)
		For the purposes of this Policy, this refers to the following (as well
		as other areas not listed):
	Internal areas of GFB	Processes and Channels (for institutional communications
		to the branch network).
		Communication (in the publication of postcards regarding)
		organizational culture and follow-up with the Banorte's
		Protectors network through the institutional media).
		Training and Education (support for training and coaching)
		Banorte Protectors).
		Risk Information Management (in the creation of platforms
20.		to automate workflows through the GRC ARCHER tool).
		Protection and Safety (Physical and Operational) (in
		emergency operations and in the detection of irregularities
		found during supervisory activities).
		Human Resources (in securely sharing the databases of
		Banorte employees; in handling of inspections by
		regulatory authorities and identifying Banorte Protectors).
		Medical Service (in attending to medical emergencies or
		contingencies to be the first response in timely care).
		Occupational Health (in compliance with NOM-002-STPS-
		2010, Safety conditions - Fire prevention and protection in
		2010, Carety Conditions 1 lie prevention and protection in



- workplaces, specializing in the preventive aspect; also in attending to inspections by regulatory authorities).
- Business Continuity (tracking natural phenomena that may affect the continuity of Grupo Financiero Banorte's operations).
- Safety Engineering (in correcting deficiencies found in the alarm, protection and risk mitigation systems in GFB properties).
- Banorte Protectors (in following up on irregularities detected and providing the first response in the event of an emergency; in carrying out inspections in the branch network, participating in drills and in the annual Banorte Protectors week).
- Sustainability (in developing processes or standards by which Grupo Financiero Banorte can contribute to sustainable development).
- Material Resources (to reserve the space where the Banorte Protectors can conduct their activities; coordinate joint actions to improve the procurement of products and services required, and supply documentation on the properties that the regulatory authorities may require in matters of prevention.
- General Services (emergency response, support in the management of specific requests, for example, painting works, placement of signage within the properties).
- Commercial Department (to coordinate dates for annual training and staffing of Banorte Protectors, participation and execution of the annual program of drills, access and validation of maintenance services for fire extinguishers, inspection rounds by the mixed Safety and Hygiene Committee, and inspections of the branch network by authorities).
- Compliance Office (issuance/updating of regulatory manuals).



	1	A planning and appretional instrument limited to the access of an
21.	Internal Civil Protection Program (ICPP)	A planning and operational instrument, limited to the scope of an
		agency, entity, institution or organization of the public, private or
		social sector; composed of the operational plan for the Internal Civil
		Protection Unit, the business continuity plan and emergency plan;
		designed to mitigate previously identified risks and determine
		preventive and response actions in the event of emergency or
		disaster.
	Letter of Responsibility /	Document issued by the fire extinguisher maintenance provider
22.	Letter of Guarantee /	guaranteeing the correct physical condition and operation of the
	Letter of Good Condition	extinguishers. This document is valid for one year.
		The service center that receives and follows up on requests arising
23.	National Reporting Desk	from inspection reports, visits by the authorities or observations
23.	National Reporting Desk	from users of GFB properties, regarding Civil Protection and Health
		and Safety.
		For the purposes of this Policy, the term refers to personnel
		assigned to that Department, who occupy the following positions:
	Prevention and Safety	Director of Prevention and Safety Culture.
24.	Culture Department	Prevention and Safety Culture Manager.
		Prevention and Safety Culture Coordinator.
		Prevention and Safety Culture Supervisor.
	Calf Cantained Breathing	Devices designed to provide protection to persons using them when
25.	Self-Contained Breathing	oxygen deficiencies and toxic atmospheres exist in an enclosed
	Apparatus	space.
		For the purposes of this Policy, the term refers to Prevention and
		Safety Culture Supervisors (staff from the Prevention and Safety
	Supervisors	Culture Department), who are responsible for carrying out all the
		necessary activities related to prevention and compliance with the
26.		various laws, rules and regulations issued by regulatory authorities
		in the area of civil protection, aimed at safeguarding the lives and
		integrity of employees and customers, as well as the assets and
		environment of GFB, in accordance with the assigned control
		divisions (branch network).
	Suppliers / providers	Person or company that provides goods or services necessary for
27.		GFB operations.
		<u> </u>



28.	Surrounding risks	Elements or establishments that are temporarily or permanently present in the areas surrounding GFB properties which may
		represent hazards and which, due to the degree of exposure or vulnerability of the assessed entity, represent a degree of risk.
29.	Users	Any individual or corporation that uses the services provided by the companies that make up GFB, without having an existing contractual relationship with any of these.