

TAX ADMINISTRATION SERVICE

SYSTEM FOR THE PRESENTATION OF THE 2019 OPINION

NAME OF THE TAXPAYER:

GRUPO FINANCIERO BANORTE, S.A.B. DE C.V.

EXHIBIT INFORMATION: REPORT

REPORT ON THE REVIEW OF THE TAXPAYER FISCAL SITUATION

TO THE BOARD OF DIRECTORS AND SHAREHOLDERS OF GRUPO FINANCIERO BANORTE, S.A.B. DE C.V.

TO THE MINISTRY OF FINANCE AND PUBLIC CREDIT

TO THE TAX ADMINISTRATION SERVICE (SAT)

TO THE LARGE TAXPAYERS GENERAL ADMINISTRATION OFFICE

1. I ISSUE THIS REPORT IN CONNECTION WITH THE AUDIT I PERFORMED UNDER INTERNATIONAL AUDITING STANDARDS (NIA) OF THE FINANCIAL STATEMENTS PREPARED BY THE MANAGEMENT OF GRUPO FINANCIERO BANORTE, S.A.B. DE C.V. IN ACCORDANCE WITH ARTICLES 32-A OF THE FISCAL CODE OF THE FEDERATION (CFF), 58 SECTIONS I, IV AND V OF THE REGULATIONS OF THE FISCAL CODE OF THE FEDERATION (RCFF), RULES 2.13.7, 2.13.15 (2.13.25) OF THE FISCAL MISCELLANEOUS RESOLUTION (RMF) FOR 2020, THE INTEGRATION AND CHARACTERISTICS INSTRUCTIONS AND THE GUIDELINE FORMATS FOR THE PRESENTATION OF THE OPINION ON THE FINANCIAL STATEMENTS FOR FISCAL PURPOSES CONTAINED IN EXHIBIT 16-A OF THE FISCAL MISCELLANEOUS RESOLUTION.

AS A CONSEQUENCE OF THIS AUDIT, I ISSUED A REPORT DATED AUGUST 14, 2020 WITHOUT EXCEPTIONS.

2. EXCLUSIVELY REGARDING THIS SECTION 2, I HEREBY STATE, UNDER OATH, BASED ON ARTICLES 52 SECTION III OF THE FISCAL CODE OF THE FEDERATION, 57 AND 58 SECTION III OF THE REGULATIONS OF THE FISCAL CODE OF THE FEDERATION AND RULES 2.13.16 OF THE FISCAL MISCELLANEOUS RESOLUTION THAT:
 - A. IN CONNECTION WITH THE AUDIT OF THE FINANCIAL STATEMENTS OF GRUPO FINANCIERO BANORTE, S.A.B. DE C.V. (THE ENTITY) UNDER THE INTERNATIONAL AUDITING STANDARDS, FOR THE YEAR ENDED DECEMBER 31, 2019, I REFER TO IN THE ABOVE SECTION, I ISSUED MY OPINION WITHOUT EXCEPTIONS AFFECTING THE FISCAL SITUATION OF THE TAXPAYER.

- B. AS PART OF MY AUDIT DESCRIBED IN THE ABOVE SECTION, I REVIEWED THE ADDITIONAL INFORMATION AND DOCUMENTATION PREPARED BY AND UNDER THE RESPONSIBILITY OF THE ENTITY, IN ACCORDANCE WITH ARTICLES 32-A OF THE FISCAL CODE OF THE FEDERATION, 58 SECTIONS I, IV AND V OF THE REGULATIONS OF THE FISCAL CODE OF THE FEDERATION, RULES 2.13.7, 2.13.16 OF THE FISCAL MISCELLANEOUS RESOLUTION AND THE GUIDELINES FORMATS AND INSTRUCTIONS FOR THE INTEGRATION AND CHARACTERISTICS FOR THE PRESENTATION OF THE OPINION ON THE FINANCIAL STATEMENTS FOR FISCAL PURPOSES CONTAINED IN EXHIBIT 16-A OF THE FISCAL MISCELLANEOUS RESOLUTION SUBMITTED IN THE SYSTEM FOR THE PRESENTATION OF THE 2019 FISCAL OPINION (SIPREDI) TO THE TAX ADMINISTRATION SYSTEM VIA INTERNET. I HAVE AUDITED THIS INFORMATION AND DOCUMENTATION BY MEANS OF SELECTIVE TESTS USING THE AUDITING PROCEDURES APPLICABLE UNDER THE CIRCUMSTANCES, AND WITHIN THE NECESSARY SCOPE TO BE ABLE TO EXPRESS MY OPINION ON SUCH FINANCIAL STATEMENTS TAKEN AS A WHOLE, IN ACCORDANCE WITH INTERNATIONAL AUDITING STANDARDS. SUCH INFORMATION IS INCLUDED FOR THE EXCLUSIVE USE AND ANALYSIS OF THE LARGE TAXPAYERS GENERAL ADMINISTRATION OFFICE.

BASED ON MY AUDIT, I HEREINBELOW STATE AS FOLLOWS:

- i. WITHIN THE SELECTIVE TESTS PERFORMED IN COMPLIANCE WITH INTERNATIONAL AUDITING STANDARDS, I REVIEWED THE FISCAL SITUATION OF THE TAXPAYER REFERRED TO IN ARTICLE 58, SECTION V, OF THE REGULATIONS OF THE FISCAL CODE OF THE FEDERATION, RULES 2.13.19 AND 2.13.20 AND SECTION XVI OF RULE 2.13.16 OF THE FISCAL MISCELLANEOUS RESOLUTION FOR THE PERIOD COVERED BY THE AUDITED FINANCIAL STATEMENTS AND, WITHIN THE SCOPE OF MY SELECTIVE TESTS, I REVIEWED THAT ALL GOODS AND SERVICES ACQUIRED, DISPOSED OF OR GRANTED FOR THE USE OR ENJOYMENT OF THE ENTITY WERE ACTUALLY RECEIVED, DELIVERED OR LENT, RESPECTIVELY, ACCORDING TO SECTION II OF RULE 2.13.16 OF THE FISCAL MISCELLANEOUS RESOLUTION. THE PROCEDURES I APPLIED DID NOT INCLUDE AN EXAMINATION REGARDING COMPLIANCE WITH ANY CUSTOMS OR FOREIGN TRADE PROVISIONS.

MY WORKPAPERS INCLUDE THE EVIDENCE OF THE AUDITING PROCEDURES APPLIED TO ITEMS SELECTED BY SAMPLING AND WHICH SUPPORT THE CONCLUSIONS REACHED.

- ii. I VERIFIED, BASED ON SELECTIVE TESTS AND INTERNATIONAL AUDITING STANDARDS, THE CALCULATION AND PAYMENT OF THE FEDERAL TAXES INCURRED IN THE FISCAL YEAR, INCLUDED IN THE LIST OF TAXES TO BE PAID BY THE TAXPAYER AS DIRECT SUBJECT OR AS WITHHOLDER.
- iii. DUE TO THE FACT THAT THE ENTITY HAS NO EMPLOYEES, NO EMPLOYER-EMPLOYEE FEES PAYABLE TO THE MEXICAN INSTITUTE OF

SOCIAL SECURITY (IMSS) DERIVED FROM ANY WAGES AND SALARIES ARE DETERMINED.

- iv. I REVIEWED, BASED ON SELECTIVE TESTS AND INTERNATIONAL AUDITING STANDARDS, THAT THE TAXPAYER IS ENTITLED TO THE FAVORABLE BALANCES REQUESTED IN THE RETURNS MADE DURING THE FISCAL YEAR UNDER REVIEW AND THAT THE AMOUNTS PENDING RETURN OR RETURNED TO THE ENTITY BY THE TAX AUTHORITY DERIVE FROM SUCH BALANCE.
- v. I REVIEWED, ACCORDING TO THE NATURE AND APPLICATION METHOD USED, IF ANY, DURING PREVIOUS YEARS, THE ITEMS AND AMOUNTS SHOWN IN THE FOLLOWING EXHIBITS:
 - CONCILIATION BETWEEN THE ACCOUNTING RESULT AND THE FISCAL RESULT FOR PURPOSES OF THE INCOME TAX (ISR).
 - CONCILIATION BETWEEN THE INCOME DETERMINED ACCORDING TO THE INTEGRAL PROFIT AND LOSS STATEMENT, THOSE ACCRUED FOR INCOME TAX PURPOSES AND THE SUM OF THE TOTAL AMOUNT OF ANY ACTS OR ACTIVITIES FOR VALUE ADDED TAX (VAT) PURPOSES OF THE DEFINITIVE MONTHLY PAYMENTS MADE, CORRESPONDING TO 2019.
- vi. DURING THE FISCAL YEAR, I WAS NOT AWARE THAT THE TAXPAYER MAY HAVE FILED ANY SUPPLEMENTARY TAX RETURNS MODIFYING THOSE OF PREVIOUS FISCAL YEARS NOR DUE TO ANY DIFFERENCES IN TAXES FOR THE AUDITED FISCAL YEAR.
- vii. DUE TO THE FACT THAT THE ENTITY HAS NO EMPLOYEES, IT DID NOT DETERMINE OR PAID ANY WORKERS PROFIT-SHARING.
- viii. I CHECKED, BY MEANS OF SELECTIVE TESTS, THE BALANCES OF THE ACCOUNTS INDICATED IN THE EXHIBITS RELATED TO THE COMPARATIVE ANALYSIS OF THE EXPENSES SUBACCOUNTS, THE COMPARATIVE ANALYSIS OF THE INTEGRAL FINANCING RESULT SUBACCOUNTS, CONCILIATING, AS APPLICABLE: A) ANY DIFFERENCES WITH THE BASIC FINANCIAL STATEMENTS, DERIVED FROM RECLASSIFICATION FOR THE PRESENTATION THEREOF AND B) THE DETERMINATION OF ANY DEDUCTIBLE AND NON-DEDUCTIBLE AMOUNTS FOR INCOME TAX EFFECTS.
- ix. DURING THE FISCAL YEAR ENDED DECEMBER 31, 2019, I WAS NOT AWARE THAT THE ENTITY OBTAINED ANY RESOLUTIONS FROM ANY FISCAL OR JURISDICTIONAL AUTHORITIES (ADMINISTRATIVE JUSTICE FEDERAL COURT, (FORMERLY, FISCAL AND ADMINISTRATIVE JUSTICE FEDERAL COURT) OR THE MEXICAN SUPREME COURT OF JUSTICE – DISTRICT COURTS AND COLLEGIATE CIRCUIT COURT)) OR THAT IT ENJOYED ANY FISCAL INCENTIVES, EXEMPTIONS, SUBSIDIES OR TAX CREDITS.

- x. DURING THE FISCAL YEAR, THE ENTITY WAS NOT JOINTLY RESPONSIBLE AS WITHHOLDER IN THE DISPOSAL OF SHARES MADE BY THOSE RESIDING ABROAD.
- xi. IT WAS NOT PRACTICAL TO DETERMINE THE PERCENTAGE OF THE SCOPE OF THE REVIEW OF EXCHANGE FLUCTUATIONS; HOWEVER, AS PART OF THE SELECTIVE TESTS, WE REVIEWED THE RESULTS OF EXCHANGE FLUCTUATIONS, CHECKING THE EXCHANGE RATES APPLICABLE ON THE DATE OF THE TRANSACTION, PAYMENT, COLLECTION AND YEAR-END.
- xii. THE BALANCES OF THE ENTITY WITH ITS MAIN RELATED PARTIES AS OF DECEMBER 31, 2019 ARE DISCLOSED IN NOTE 5 TO THE FINANCIAL STATEMENTS, INCLUDED IN THE EXHIBIT ENTITLED "NOTES TO THE FINANCIAL STATEMENTS" OF THE SIPRED. OPERATIONS WITH RELATED PARTIES PERFORMED DURING THE FISCAL YEAR ARE DISCLOSED IN EXHIBIT 12 "OPERATIONS WITH RELATED PARTIES" OF THE SIPRED.
- xiii. WITHIN THE SCOPE OF MY SELECTIVE TESTS, I REVIEWED COMPLIANCE WITH THE OBLIGATIONS RELATED TO OPERATIONS WITH RELATED PARTIES AS ESTABLISHED IN THE FOLLOWING PROVISIONS: ARTICLES 11, 27 SECTION XIII, 28 SECTIONS XVII, FOURTH PARAGRAPH, SUBSECTION B), XVIII, XXVII, AND XXXI, 76, SECTIONS IX, X AND XII, 76-A, SECTIONS I, II AND II, OF THE INCOME TAX LAW.
- xiv. DURING THE FISCAL YEAR ENDED DECEMBER 31, 2019, THE ENTITY INCORPORATED THE INFORMATION RELATED TO THE APPLICATION OF SOME CRITERIA DIFFERENT FROM THOSE WHICH, IF ANY, IT WOULD HAVE INFORMED TO THE TAX AUTHORITY UNDER PARAGRAPH H) OF SECTION I OF ARTICLE 33 OF THE FISCAL CODE OF THE FEDERATION IN FORCE AS OF DECEMBER 2019 IN THE EXHIBIT OF GENERAL INFORMATION OF THE SIPRED. THE TAXPAYER INFORMED IN SUCH EXHIBIT THAT DURING FISCAL YEAR ENDED DECEMBER 31, 2019 IT DID NOT APPLY
- xv. SUCH CRITERIA.

MISCELLANEOUS

- xvi. MY ANSWERS TO THE QUESTIONS CONTAINED IN THE FISCAL DIAGNOSIS QUESTIONNAIRE AND THE TRANSFER PRICES QUESTIONNAIRE WHICH ARE PART OF THE INFORMATION INCLUDED IN THE SIPRED, ARE BASED ON THE RESULTS OF MY AUDIT OF THE BASIC FINANCIAL STATEMENTS, TAKEN AS A WHOLE, OF THE ENTITY CALLED GRUPO FINANCIERO BANORTE, S.A.B. DE C.V. AS OF DECEMBER 31, 2019 AND FOR THE YEAR ENDED ON SUCH DATE, WHICH WAS PERFORMED IN ACCORDANCE WITH INTERNATIONAL AUDITING STANDARDS. ACCORDINGLY, THE ANSWERS INDICATING COMPLIANCE WITH ANY TAX PROVISIONS BY THE TAXPAYER ARE SUPPORTED BY: A) THE RESULT OF MY AUDIT CARRIED OUT ACCORDING TO INTERNATIONAL AUDITING STANDARDS, OR B) THE FACT THAT DURING

MY AUDIT, WHICH I PERFORMED IN ACCORDANCE WITH INTERNATIONAL AUDITING STANDARDS, I REVIEWED AND HAD NO KNOWLEDGE OF ANY NON-COMPLIANCE BY THE TAXPAYER WITH ITS FISCAL OBLIGATIONS.

SOME ANSWERS TO THE QUESTIONS CONTAINED IN THE FISCAL DIAGNOSIS QUESTIONNAIRE AND THE TRANSFER PRICES QUESTIONNAIRE WERE LEFT BLANK DUE TO THE FACT THAT: ARE NOT APPLICABLE TO THE ENTITY, 2) THERE IS NO POSSIBLE ANSWER OR 3) THE INFORMATION WAS NOT REVIEWED SINCE IT WAS NOT INCLUDED WITHIN THE SCOPE OF MY REVIEW, WHICH DOES NOT CONSTITUTE A NON-COMPLIANCE WITH THE TAX PROVISIONS.

- xvii. IN CONNECTION WITH THE ANSWERS GIVEN BY THE ENTITY ON THE FISCAL DIAGNOSIS QUESTIONNAIRE AND THE TRANSFER PRICES QUESTIONNAIRE INCLUDED IN EXHIBITS "GENERAL INFORMATION" AND "INFORMATION OF THE TAXPAYER ON ITS OPERATIONS WITH RELATED PARTIES", RESPECTIVELY, WHICH ARE PART OF THE INFORMATION INCLUDED IN THE SIPRED, I HAVE ANALYZED AND CHECKED THAT SUCH ANSWERS ARE CONSISTENT WITH THE RESULTS OF MY AUDIT PERFORMED UNDER INTERNATIONAL AUDITING STANDARDS.

ACCORDINGLY, THE ANSWERS INDICATING COMPLIANCE WITH THE TAX PROVISIONS BY THE TAXPAYER ARE SUPPORTED ON THE FACT THAT DURING THE AUDIT I PERFORMED, I REVIEWED AND HAD NO KNOWLEDGE OF ANY NON-COMPLIANCE WITH THE FISCAL OBLIGATIONS REFERRED TO IN SUCH QUESTIONNAIRES.

LIKewise, SOME QUESTIONS REQUIRE INFORMATION THAT IS NOT INCLUDED IN THE BASIC FINANCIAL STATEMENTS, FOR WHICH REASON THE ANSWERS WERE GIVEN BY THE ENTITY AND ARE NOT INCLUDED IN THE SCOPE OF MY AUDIT.

- xviii. AS OF DECEMBER 31, 2019, NO NON-MATERIAL DIFFERENCES IN TAXES IN CHARGE OF THE TAXPAYER AS DIRECT SUBJECT OR AS WITHHOLDER, WERE IDENTIFIED.

(SIGNED)
C. P. C. DANIEL CASTELLANOS CÁRDENAS
AGAFF REGISTRY NUMBER 17195
AUGUST 14, 2020.