

REPORT ON THE REVIEW OF THE TAXPAYER'S 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 GENERAL ADMINISTRATION OF MAJOR TAXPAYERS

1. I HEREBY ISSUE THIS REPORT IN CONNECTION WITH THE AUDIT I CARRIED OUT UNDER THE INTERNATIONAL AUDITING STANDARDS (IAS) 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 (FCC), 58 SECTIONS I, IV AND V OF THE REGULATIONS OF THE FCC (RFCC), RULES 2.10.6, 2.10.14, 2.10.15 OF THE MISCELLANEOUS FISCAL RESOLUTION FOR 2022 (MFR) AND WITH THE INTEGRATION AND CHARACTERISTICS INSTRUCTIONS AND GUIDANCE FORMATS FOR THE PRESENTATION OF THE FINANCIAL STATEMENTS OPINION FOR FISCAL EFFECTS CONTAINED IN EXHIBIT 16-A OF THE MFR.

AS A CONSEQUENCE OF THIS AUDIT, I ISSUED A REPORT WITHOUT QUALIFICATIONS DATED JULY 14, 2022.

2. EXCLUSIVELY AS MENTIONED IN THIS PARAGRAPH 2, I HEREBY STATE UNDER OATH, BASED ON THE PROVISIONS OF ARTICLES 52 SECTION III OF FCC, 57 AND 58 SECTION III OF THE RFCC AND RULE 2.10.15 OF THE MFR, THAT:

a) IN CONNECTION WITH THE AUDIT CARRIED OUT IN ACCORDANCE WITH THE IAS, OF THE FINANCIAL STATEMENTS OF GRUPO FINANCIERO BANORTE, S.A.B. DE C.V (THE COMPANY) FOR THE FISCAL YEAR ENDED DECEMBER 31, 2021, I REFER TO IN THE ABOVE PARAGRAPH, I ISSUED MY OPINION WITHOUT QUALIFICATIONS AFFECTING THE TAXPAYER'S FISCAL SITUATION.

b) AS PART OF MY AUDIT DESCRIBED IN THE FOREGOING PARAGRAPH, I REVIEWED THE ADDITIONAL INFORMATION AND DOCUMENTATION DRAFTED BY AND UNDER THE RESPONSIBILITY OF THE COMPANY, IN ACCORDANCE WITH ARTICLES 32-A OF THE CCF, 58 SECTIONS I, IV AND V OF THE RCCF, RULES 2.10.6, 2.10.7, 2.10.14 OF THE MFR AND WITH THE GUIDANCE FORMATS AND THE INTEGRATION AND CHARACTERISTICS INSTRUCTIONS FOR THE PRESENTATION

OF THE FINANCIAL STATEMENTS OPINION FOR FISCAL EFFECTS CONTAINED IN EXHIBIT 16-A OF THE MFR, SUBMITTED TO THE SAT IN THE INTERNET PRESENTATION SYSTEM OF FISCAL OPINION 2021 (SIPRED). I HAVE AUDITED THIS INFORMATION AND DOCUMENTATION BY MEANS OF SELECTIVE TESTS, USING THE APPLICABLE AUDIT PROCEDURES UNDER THE CIRCUMSTANCES, WITHIN THE NECESSARY SCOPE TO EXPRESS MY OPINION ON THE FINANCIAL STATEMENTS TAKEN AS A WHOLE, IN ACCORDANCE WITH THE IAS. SUCH INFORMATION IS INCLUDED FOR THE EXCLUSIVE USE AND ANALYSIS BY THE GENERAL ADMINISTRATION OF MAJOR TAXPAYERS. BASED ON MY AUDIT, I HEREBY STATE THE FOLLOWING:

I. WITHIN THE SELECTIVE TESTS CARRIED OUT IN COMPLIANCE WITH THE IAS, I REVIEWED THE TAXPAYER'S FISCAL SITUATION REFERRED TO IN ARTICLE 58 SECTION V OF THE RCCF, FOR THE PERIOD COVERED BY THE AUDITED FINANCIAL STATEMENTS AND, WITHIN THE SCOPE OF MY SELECTIVE TESTS, I CHECKED THAT ALL GOODS AND SERVICES ACQUIRED OR DISPOSED OF OR GRANTED FOR THE USE OR BENEFIT OF THE COMPANY, WHERE ACTUALLY RECEIVED, DELIVERED OR GRANTED, RESPECTIVELY. IN ACCORDANCE WITH SECTION II OF RULE 2.10.15 OF THE MFR, THE PROCEDURES I APPLIED DID NOT INCLUDE ANY EXAMINATION WITH RESPECT TO COMPLIANCE WITH THE PROVISIONS REGARDING CUSTOMS AND FOREIGN TRADE.

THERE IS EVIDENCE IN MY WORKING PAPERS OF THE AUDIT PROCEDURES APPLIED TO THE ITEMS SELECTED THROUGH SAMPLING AND SUPPORTING THE RESULTS OBTAINED.

II. BASED ON SELECTIVE TESTS AND THE IAS, I REVIEWED THE CALCULATION AND PAYMENT OF THE FEDERAL TAXES ACCRUED DURING THE FISCAL YEAR INCLUDED IN THE TAX REPORT OF THE TAXPAYER AS A DIRECT SUBJECT OR IN ITS CAPACITY AS WITHHOLDER.

SINCE THE COMPANY DOES NOT HAVE ANY EMPLOYEES, EMPLOYEE-EMPLOYER FEES TO BE PAID TO THE MEXICAN SOCIAL SECURITY INSTITUTE (IMSS) DERIVED FROM ANY WAGES AND SALARIES ARE NOT DETERMINED.

III. BASED ON SELECTIVE TESTS AND THE IAS, I REVIEWED THAT THE TAXPAYER IS ENTITLED TO THE RECOVERABLE BALANCES REQUESTED IN THE TAX RETURNS CARRIED OUT DURING THE FISCAL YEAR SUBJECT TO REVIEW AND THAT THE AMOUNTS PENDING RETURN OR RETURNED TO THE COMPANY BY THE FISCAL AUTHORITY DERIVE FROM SUCH BALANCE.

IV. I REVIEWED, BASED ON THE NATURE AND APPLICATION MECHANISM USED, AS THE CASE MAY BE, DURING PREVIOUS FISCAL YEARS, THE CONCEPTS AND AMOUNTS SHOWN IN THE FOLLOWING EXHIBITS:

- RECONCILIATION BETWEEN THE ACCOUNTING AND TAX RESULTS FOR INCOME TAX EFFECTS
- RECONCILIATION BETWEEN THE AUDITED INCOME ACCORDING TO THE INTEGRAL INCOME STATEMENT, AGGREGATES FOR INCOME TAX EFFECTS AND THE SUM OF ALL ACTS OR ACTIVITIES FOR VALUE-ADDED TAX (VAT) EFFECTS OF THE 2021 DEFINITIVE MONTHLY PAYMENTS MADE.

V. I WAS NOT AWARE THAT THE TAXPAYER FILING, DURING THE FISCAL YEAR, ANY SUPPLEMENTARY TAX RETURNS MODIFYING THOSE OF PREVIOUS FISCAL YEARS NOR ANY TAX DIFFERENCES FOR THE AUDITED FISCAL YEAR. LIKEWISE, I REVIEWED THE SUPPLEMENTARY TAX RETURNS I KNEW OF FILED BY THE TAXPAYER FOR THE TAX DIFFERENCES OF THE AUDITED FISCAL YEAR, EVIDENCING THAT THEY WERE FILED IN ACCORDANCE WITH THE APPLICABLE TAX PROVISIONS.

VI. SINCE THE COMPANY DOES NOT HAVE ANY EMPLOYEES, IT DID NOT ACCRUE NOR PAID ANY PROFIT-SHARING TO EMPLOYEES.

VII. THROUGH SELECTIVE TESTS, I REVIEWED THE BALANCES IN THE ACCOUNTS STATED IN THE EXHIBITS RELATIVE TO THE EXPENSE SUBACCOUNT COMPARATIVE ANALYSIS, THE FINANCING INTEGRAL RESULT SUBACCOUNT COMPARATIVE ANALYSIS, RECONCILING, IN ITS CASE: A) ANY BASIC FINANCING STATEMENTS DIFFERENCES DERIVED FROM RECLASSIFICATIONS FOR THEIR FILING, AND B) DETERMINING DEDUCTIBLE AND NON-DEDUCTIBLE AMOUNTS FOR INCOME TAX PURPOSES.

VIII. I WAS NOT AWARE OF THE COMPANY OBTAINING ANY RESOLUTIONS FROM THE TAX OR JURISDICTIONAL AUTHORITIES (FEDERAL ADMINISTRATIVE JUSTICE COURT (PREVIOUSLY CALLED THE FEDERAL COURT OF FISCAL AND ADMINISTRATIVE JUSTICE) OR THE SUPREME COURT OF JUSTICE – DISTRICT AND CIRCUIT COURTS) OR THAT IT BENEFITTED FROM ANY TAX INCENTIVES, EXEMPTIONS, SUBSIDIES OR TAX CREDITS, DURING THE FISCAL YEAR ENDED DECEMBER 31, 2021.

IX. DURING THE FISCAL YEAR, I WAS NOT AWARE OF THE ENTITY BEING JOINTLY LIABLE AS WITHHOLDER IN THE DISPOSAL OF SHARES CARRIED OUT BY RESIDENTS ABROAD.

X. THE TAXPAYER DID NOT RECORD ANY CURRENCY FLUCTUATIONS DURING THE FISCAL YEAR.

XI. THE BALANCES OF THE COMPANY WITH ITS MAIN RELATED PARTIES AS OF DECEMBER 31, 2021, ARE DISCLOSED IN NOTE 5 TO THE FINANCIAL STATEMENTS, INCLUDED IN THE EXHIBIT "NOTES TO THE FINANCIAL STATEMENT" OF THE SIPRED. TRANSACTIONS WITH RELATED PARTIES CARRIED OUT DURING THE FISCAL YEAR ARE DISCLOSED IN EXHIBIT 12 "TRANSACTIONS WITH RELATED PARTIES" OF THE SIPRED. WITHIN THE SCOPE OF MY SELECTIVE TESTS, I REVIEWED COMPLIANCE WITH OBLIGATIONS RELATIVE TO TRANSACTIONS WITH RELATED PARTIES IN ACCORDANCE WITH THE FOLLOWING PROVISIONS OF THE INCOME TAX LAW, ARTICLES 11, 27 SECTION XIII, 28 SECTIONS XVII, FOURTH PARAGRAPH, SUBPARAGRAPH B) XVIII, XXVII, XXIX, 76 SECTIONS IX, X AND XII, 179 OF THE INCOME TAX LAW.

XII. DURING THE FISCAL YEAR ENDED DECEMBER 31, 2021, IN THE GENERAL INFORMATION EXHIBIT OF THE SIPRED, THE COMPANY INCLUDED THE INFORMATION RELATED TO THE APPLICATION OF SOME OF THE CRITERIA DIFFERENT TO THOSE IT WOULD HAVE MADE KNOWN, IN ITS CASE, THE TAX AUTHORITY IN ACCORDANCE WITH SUBPARAGRAPH H) OF SECTION I OF ARTICLE 33 OF THE FEDERAL FISCAL CODE IN FORCE ON DECEMBER 31, 2021. THE TAXPAYER STATED IN THE AFOREMENTIONED EXHIBIT THAT, DURING THE FISCAL YEAR ENDED DECEMBER 31, 2021, IT DID NOT APPLY SUCH CRITERIA.

XIII. WITHIN THE SCOPE OF MY SELECTIVE TESTS, I REVIEWED THE INFORMATION THE TAXPAYER INCLUDED IN THE TAX RETURNS FILED IN COMPLIANCE WITH ITS OBLIGATIONS RELATED TO THE FOLLOWING TAX PROVISIONS WITH NO OMISSION BEING OBSERVED:

a) ARTICLE 76, SECTION XIII OF THE INCOME TAX LAW, "TAX RETURN OF TRANSACTIONS CARRIED OUT THROUGH TRUSTS (EXHIBIT 10 OF THE DIM)

b) ARTICLE NINE OF THE TRANSITORY PROVISIONS OF THE INCOME TAX LAW FOR 2014, SECTION X, "INCOME TAX, VALUE-ADDED TAX AND SPECIAL TAX PAYMENTS AND WITHHOLDINGS" (EXHIBIT 2 OF THE DIM).

OTHER ITEMS

3. MY ANSWERS TO THE QUESTIONS OF THE TAX DIAGNOSTIC QUESTIONNAIRES AND RELATED TO TRANSFER PRICES, 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 COMPANY CALLED GRUPO FINANCIERO BANORTE, S.A.B. DE C.V., AS OF DECEMBER 31, 2021, AND FOR FISCAL YEAR ENDED ON THAT DATE, WHICH WAS CARRIED OUT IN ACCORDANCE WITH THE IAS; CONSEQUENTLY, THE ANSWERS STATING COMPLIANCE WITH THE TAX PROVISIONS BY THE TAXPAYER, ARE BASED ON: A) THE RESULTS OF THE AUDIT I CARRIED OUT IN ACCORDANCE WITH THE IAS, OR B) THE FACT THAT, DURING THE AUDIT I CARRIED OUT IN ACCORDANCE WITH THE IAS, I REVIEWED AND WAS NOT AWARE OF ANY NONCOMPLIANCE BY THE TAXPAYER WITH ITS TAX OBLIGATIONS.

SOME OF THE ANSWERS TO THE QUESTIONS OF THE TAX DIAGNOSTIC QUESTIONNAIRE AND THE QUESTIONNAIRE RELATED TO TRANSFER PRICES WERE LEFT BLANK DUE TO: 1) NOT APPLYING TO THE COMPANY, 2) NO ANSWER POSSIBLE OR 3) THE INFORMATION WAS NOT CHECKED SINCE IT WAS NOT WITHIN THE SCOPE OF MY REVIEW, WHICH DOES NOT CONSTITUTE NONCOMPLIANCE WITH THE TAX PROVISIONS.

4. IN RELATION TO THE ANSWERS PROVIDED BY THE COMPANY ON THE TAXPAYER TAX DIAGNOSTIC QUESTIONNAIRES AND RELATED TO TRANSFER PRICES INCLUDED IN THE EXHIBITS "GENERAL INFORMATION" AND "TAXPAYER INFORMATION RELATED TO ITS TRANSACTIONS WITH RELATED PARTIES", RESPECTIVELY, FORMING PART OF THE INFORMATION INCLUDED IN THE SIPRED, I HAVE ANALYZED AND REVIEWED SUCH ANSWERS BEING CONSISTENT WITH THE RESULTS OF MY AUDIT CARRIED OUT IN ACCORDANCE WITH THE IAS.

CONSEQUENTLY, THE ANSWERS STATING COMPLIANCE WITH THE TAX PROVISIONS BY THE TAXPAYER ARE JUSTIFIED ON THE FACT THAT, DURING THE AUDIT I CARRIED OUT, I REVIEWED AND WAS NOT AWARE OF ANY NONCOMPLIANCE WITH RESPECT TO THE TAX OBLIGATIONS SUCH QUESTIONNAIRES REFER TO.

LIKEWISE, SOME ANSWERS REQUIRED INFORMATION NOT WITHIN THE BASIC FINANCIAL STATEMENTS; THEREFORE, THE ANSWERS WERE PROVIDED BY THE COMPANY AND ARE NOT WITHIN THE SCOPE OF MY AUDIT.

5. AS OF DECEMBER 31, 2021, NO IMPORTANT TAX DIFFERENCES BY THE TAXPAYER AS DIRECT SUBJECT OR IN ITS CAPACITY AS WITHHOLDER WERE IDENTIFIED.

[Signed]

HÉCTOR GARCÍA GARZA, CERTIFIED PUBLIC ACCOUNTANT

REGISTRY NUMBER 15255 IN THE AGAFF

JULY 15, 2022