

1. Name of the process.

Human Rights Policy.

2. Purpose of the process.

Establish GFNorte commitments, frame of reference and guidelines on the protection of Human Rights.

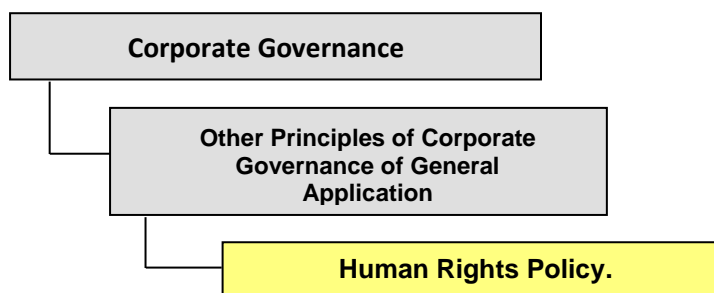
3. Scope.

Areas	This policy is generally applicable to all companies and interest groups that belong to Grupo Financiero Banorte.
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4. Route.

Corporate Governance / Other Principles of Corporate Governance of General Application / Human Rights Policy.

5. Hierarchical diagram.



6. Associated General Policies.

- Human Rights Policy.

1. Policy Name

Human Rights Policy.

2. Scope

This policy is generally applicable to all companies and interest groups that belong to Grupo Financiero Banorte..

3. Content:

1. Objective:

A. Establish GFNorte human rights commitments, framework and guidelines.

2. Introduction:

A. According to the United Nations (UN), human rights are the set of powers inherent in the nature of the person, the effective realization of which is essential for the integral development of the individual..

B. GFNorte recognizes the value and importance of human rights, likewise, through the General Directorate and with the support of the Specialist Directorate for Sustainability and Responsible Investment, promotes policies and procedures aimed at respecting and protecting them; for its collaborators, suppliers, clients and stakeholders..

3. Regulatory Framework:

A. This policy is based on national and international human rights agreements and initiatives of which Mexico and GFNorte are part; in the national legal framework, as well as in the regulations that frame the processes of the companies that belong to GFNorte. The following is an illustrative, non-limiting list of the main regulatory instruments:

1. International agreements and initiatives.

- a.** The International Charter of Human Rights.
- b.** International Covenant on Civil Rights and its two protocols.
- c.** International Covenant on Economic, Social and Cultural Rights.
- d.** Statement of the International Labor Organization.
- e.** United Nations Guiding Principles on Business and Human Rights (UNGPs)
- f.** The ten principles of the United Nations Global Compact.
- g.** Equator Principles.

2. National legal framework:

- a. Current regulations of the National Commission of Human Rights (CNDH).

3. GFNorte regulations:

- a. Code of conduct.
- b. Sustainability Committee.
- c. Environmental Policy.
- d. Social policy.
- e. Socio-Environmental risk policy
- f. Responsible Investment Policy.
- g. Natural Capital Policy.
- h. Psychosocial Risk Policy.

4. On internal and external initiatives and commitments:

A. Considering the relevance that human rights charge among our collaborators, clients, investors, suppliers and the community in general, GFNorte has joined important initiatives to incorporate this concept in the management of its processes and activities and in its commercial and decision making:

1. Regarding collaborators:

- a. In order to establish and maintain a safe and dignified environment among its collaborators, GFNorte considers that the commitment for respect on human rights is crucial among its members. By virtue of the foregoing, collaborators, managers and directors must comply with the guidelines established in the Social Policy, the Code of Conduct and the socio-environmental risk policy, which record and endorse the respect and dignity with which it must be treated to all individuals in general.
- b. Within the previously mentioned policies and code the guidelines on how to prevent human rights risks are included, which have: forced labor, child labor, non-discrimination, freedom of association, health and safety in the workplace, well-being at work. and personal, gender equality, corruption and bribery.
- c. The Specialist Directorate for Sustainability and Responsible Investment is responsible for strengthening the integrity of its GFNorte collaborators, promoting their development and training through continuous training, as well as updating and communicating the procedures carried out in terms of protection of human rights . For the above, the Specialist Sustainability and Responsible Investment Directorate may request the support of the area Directorates that

are required according to the specialty area that is being treated (training, issuance of regulations, communication, etc.)

2. In relation to customers:

a. The GFNorte mission is to build trust and financial strength for its clients: fulfilling this commitment is essential. For this reason, through the management of the Executive Directorate of Customer Experience, programs are implemented with national scope that allow GFNorte to listen to what its customers have to say about the quality of banking service in real time..

b. GFNorte identifies two types of dimensions in which human rights are involved in the interaction with its clients:

(i) The personal treatment that exists with its clients which is regulated through the Code of Conduct and;

(ii) The process and criteria for granting financing to its clients, which is detailed in section 5 On credit activities, in the responsible investment manual and, in general, in the regulations for each of the financial services.

3. Suppliers of goods and services.:

a. Every selection of suppliers for the contracting of goods or services, must be in principle attached to the General Policies of Material Resources and the manual of Contracting of Suppliers.

b. The Deputy General Directorate of Material Resources, both for the conclusion of new contracts, and for the corresponding renewals, may include as part of the resulting contract, the declaration regarding each of the parties, where they will represent that they are recognized and they are obligated to comply with the validity of the document, with the United Nations Global Compact that establishes that companies commit to, support and put into practice the 10 fundamental values or principles in the field of Human Rights, Labor Standards, Environment and Fight against corruption to current regulations. Principles that find their foundation in The Universal Declaration of Human Rights, The Declaration on Fundamental Principles and Rights at Work, International Labor Organization, The Rio Declaration on Environment and Development, and The United Nations Convention United against Corruption. In order to eradicate child labor, the hiring of minors for the provision of specialized services is prohibited..

4. Communities:

a. This interest group includes indigenous populations and communities that reside in the places where the projects in which GFNorte invests or finances are carried out..

b. Through the Socio-environmental Risk Management System (SEMS), the environmental and social risks of GFNorte's credit portfolio are identified, classified and evaluated. The SEMS offers a frame of reference to ensure that GFNorte's client projects comply with national legislation and with best practices at the international level to guarantee respect for human rights, avoiding possible negative impacts on project-related communities. Among the most important risks to communities are the forced relocation of the same, exploitation of natural resources or water contamination (which can directly affect the health and safety of the community) as a result of the projects that are developed in them..

B. In line with the above principles and being part of the solution to global problems while generating value for the business, the Specialist Director of Sustainability and Responsible Investment will coordinate the following actions together with the General Directorates that correspond:

1. Identify, evaluate and monitor the impacts and risks resulting from operations that could present a detriment to the human rights of employees, clients, suppliers and the community in general. In the case of positive impacts, continuous improvement will be sought, on the contrary, if any negative situation is detected, strategies will be established to manage the corresponding action plans.
2. Verify that all operations, products and services are in full compliance with the applicable national legislation on issues of protection of human rights and integrate international best practices.
3. Raise awareness, inform and manage training for employees of companies belonging to GFNorte on human rights issues, to ensure their consideration in daily processes and decision-making..
4. Prioritize risk management in sensitive areas to prevent the violation of human rights in terms of population displacement and damages to indigenous peoples in conducting business.

5. On the activities of credit and responsible investment:

A. In GFNorte we know that respect for human rights is a duty, therefore, we promote their protection intrinsically in financing activities, in this regard, institutionally, the General Directorate of GFNorte, through the Specialist Director of Sustainability and Responsible Investment and the General Director of Risk and Credit Administration, manages the risks of the activities it finances, through its Social and Environmental Risk Management System (SEMS), which is documented in detail at the section 2.2.3 Social and Environmental Risk Analysis of the credit manual.

In this way, through the Credit Committees, the impacts that may neglect the achievement of the business, specific aspects such as the participation of communities, indigenous peoples, working conditions, health and safety of workers are analyzed, in line with the Performance Standards of the International Finance Corporation (see socio-environmental risk policy). In addition, we have an exclusion list for risky or prohibited activities that contemplate forced labor and child labor, among other topics.

6. Of communication:

A. GFNorte recognizes that disseminating the relevance of human rights contributes to the prevention and mitigation of operational risk and negative impacts on our operations, for which the active and responsible participation of staff, clients, investors and other stakeholders in the processes is an essential management.

B. GFNorte has sundry mechanisms that facilitate communication with its stakeholders in order to maintain an open channel of communication with them. Among the mechanisms are:

1. **Collaborators:** Intranet, email, Banorte support line, "Ethics Point" reporting system and organizational climate surveys. Likewise, the communication mechanism between the collaborators of the Branch Network and the Customer Experience area, "Tu Voz Transforma", which aims to identify and resolve the barriers that prevent a good experience for our customers. This is part of the Internal Customer Experience system that directly has an impact on our customers..

2. **Investors:** Annual report, quarterly reports, shareholders meeting, Banortel, email and website.

3. **Client:** Branches, Banorte Móvil, Contact Center, Banorte specialized unit for queries and complaints, website, social networks and satisfaction evaluations.

4. **Community:** Telephone, email, website, social networks and meetings with focused interest groups.

5. **Suppliers:** Telephone, email, tender contests and meetings with focused interest groups..

C. In this sense, the Specialist Director of Sustainability and Responsible Investment will be responsible for:

1. Keep the regulations related to the protection of human rights updated and manage their publication on the institution's internet portal.

2. Manage together with the Talent Management Department a training program aimed at the areas involved in the matter.

3. Check the comments and doubts of employees through the email sustentabilidad@banorte.com

7. On the obligation to inform

A. Responding to the principle of transparency embodied in our sustainability model, the Specialist Directorate of Sustainability and Responsible Investment will have the function of annually informing the organizations to which GFNorte is attached (See section 4), as well as their stakeholders, the results of the implementation of the principles related to the protection of human rights that have been carried out in the financial year.

8. Complaint system:

A. In accordance with the provisions of the Code of Conduct, the directors, officers or employees of GFNorte, who have direct or indirect knowledge of an irregular act, conflict of interest or non-compliance with the regulations that may constitute or come to mean damage or loss for GFNorte, or constitutes non-compliance with any of the principles of protection of human rights and in general, any non-compliance with the Code of Conduct, they must report it, with discretion, to the Deputy General Directorate of the Comptroller, and / or the Executive Directorate Audit of Banking and Subsidiary Operations or, through the complaints system and the electronic channels established in the Institution. (See Code of Conduct) (See manual of Ethics point).

Glossary of Terms

Sec.	Concepto	Descripción.
1.	Approach with Interest Groups:	The process where a business tries to understand and involve stakeholders in its activities and decisions with the aim of mitigating / eradicating possible violations of its human rights or making remediation mechanisms accessible.
2.	Supply chain:	Is a set of activities or operations involved in the process of selling a product in its entirety. In other words, the supply chain involves from the process of supervision of obtaining raw materials, manufacturing, production, to the final distribution of the product.
3.	Labor conditions:	Labor conditions are indicated by the Federal Labor Law as the basic conditions that must be granted in an equitable way to any worker without differences being made due to race, nationality, sex, age, religion, or political doctrine. Among the working conditions are the working day, rest days, Christmas bonus, and others.
4.	Universal Declaration of Human Rights:	It is a document prepared by representatives from all regions of the world with different legal and cultural backgrounds. The Declaration establishes, for the first time, the fundamental human rights to be protected worldwide.
5.	Discrimination:	Inferior treatment to a person or group for reasons of gender, sexual orientation, racial, religious, political, and others.
6.	Resource use efficiency and pollution prevention:	Organizational or technological modification that allows a defined process or task to be carried out using the minimum amount of possible resources. These modifications include product redesign processes, conversion to energy saving lighting and reduced usage.
7.	Gender equality:	Justice, impartiality and social equality between men and women.
8.	Human rights impact assessment:	It is a practice that aims to identify and face negative impacts on human rights, through an approach with stakeholders, data collection and analysis, a process of prevention, mitigation and remediation.
9.	Interest groups:	Based on Edward Freeman's definition, interest groups are groups of people who have an interest, influence or are affected by a project or activity of a business.
10.	Responsible investment:	GFNorte Responsible Investment process consists of the analysis of the environmental, social and corporate governance (ESG) factors of the issuers in which the Group invests, with the aim of improving risk and opportunity management, considering the material impact what ESG risks can generate in a long-term investment landscape

11.	GFNorte Exclusion List:	Economic activities or operations classified as risky or prohibited situations, located in the Credit Philosophy chapter of the GFNorte Credit Manual.
12.	Materiality:	Reflects significant social, environmental, and economic impacts for an organization; or those that substantially influence stakeholder assessments and decisions.
13.	Complaints mechanism:	System consisting of procedures, rules and roles to receive complaints and provide remediation and / or mitigation strategies. An effective complaint mechanism is expected to be legitimate, accessible, predictable, fair, transparent, human rights compatible and a source of continuous learning. For a mechanism to be effective at the operational level, they must be based on approach with stakeholders and dialogue according to the Guiding Principles on Business and Human Rights.
14.	Performance Standards (PS):	These are guidelines on Environmental and Social Sustainability created by the IFC, whose objective is to offer guidance to clients to identify, prevent and mitigate social and environmental risks and impacts. The PS are an integral part of the approach to risk management and together, the eight standards define the aspects that the client must respect during the investment cycle.
15.	Global Compact:	The United Nations Global Compact is the largest corporate sustainability initiative in the world. A call for companies to align their strategies and operations with the universal principles of human rights, labor standards, the environment and anti-corruption to take actions that allow progress in social objectives.
16.	Equator Principles:	Theoretical framework adopted by financial institutions to determine, evaluate and manage the environmental and social risks of projects. Its primary objective is to provide a minimum standard of due diligence and monitoring to support more responsible decision making.
17.	Principles of Responsible Investment (PRI):	PRI is an initiative of international investors in collaboration with UNEP FI and the Global Compact; Our approach to investing recognizes the relevance of environmental, social and corporate governance (ESG) factors to better manage risk and generate long-term returns. It is based on active management and the belief that these aspects can have a positive impact on the financial performance of investments.
18.	Principles of Responsible Banking:	These principles seek to align banks with the goals of society as expressed in the Sustainable Development Goals (SDGs) and the Paris Agreement. They establish the line of what it means to be a responsible bank and provide the action guide on how to achieve it.
19.	Guiding Principles on Business and Human Rights:	The global standard with the highest human rights authority in business. They are made up of 31 principles that establish how a company or a State must prevent and face the negative impacts on human rights that it could cause.
20.	Indigenous villages:	Indigenous peoples are generally defined as: 1) tribal people in independent countries whose social, economic

		and cultural conditions distinguish them from other sections of the national community, and whose status is partially or completely regulated by their own customs or traditions; 2) people in independent countries who are considered indigenous due to their descent from populations that inhabited the geographic region, to which the country belongs, at the time of the conquest, or colonization, and who retain some of its social, political, economic and cultural.
21.	Forced Labor:	Includes any type of work required of a person under any type of threat; financial, physical, psychological or a work to which the person has not voluntarily entered.
22.	Child Labor:	Any type of work performed by a child under the age of 15 (unless local law specifies a higher age, in which case that age limit applies).