

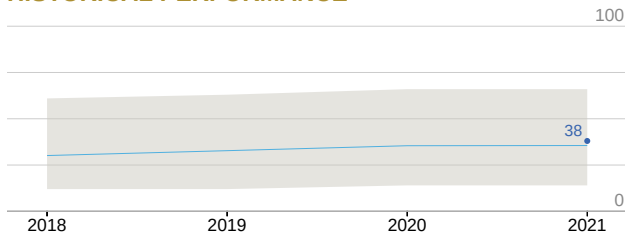
Company and Sector Performance⁽²⁾

ESG OVERALL SCORE

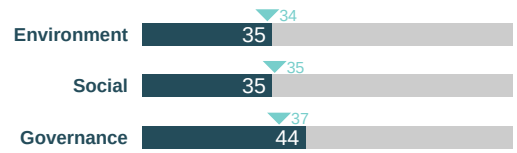


Rank in Sector	26/91
Rank in Region	172/846
Rank in Universe	1426/4894
Company Reporting Rate	66%
Sector Average Reporting Rate	71%
High severity controversies	No

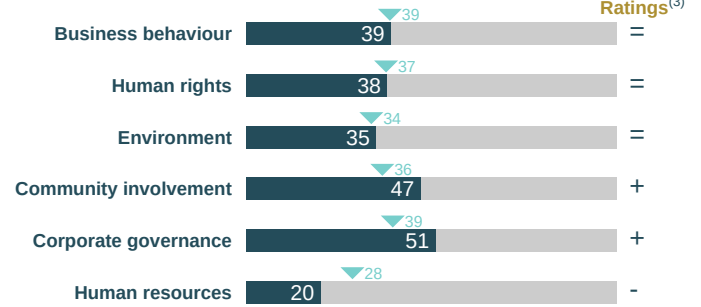
HISTORICAL PERFORMANCE



ESG PERFORMANCE (/100)

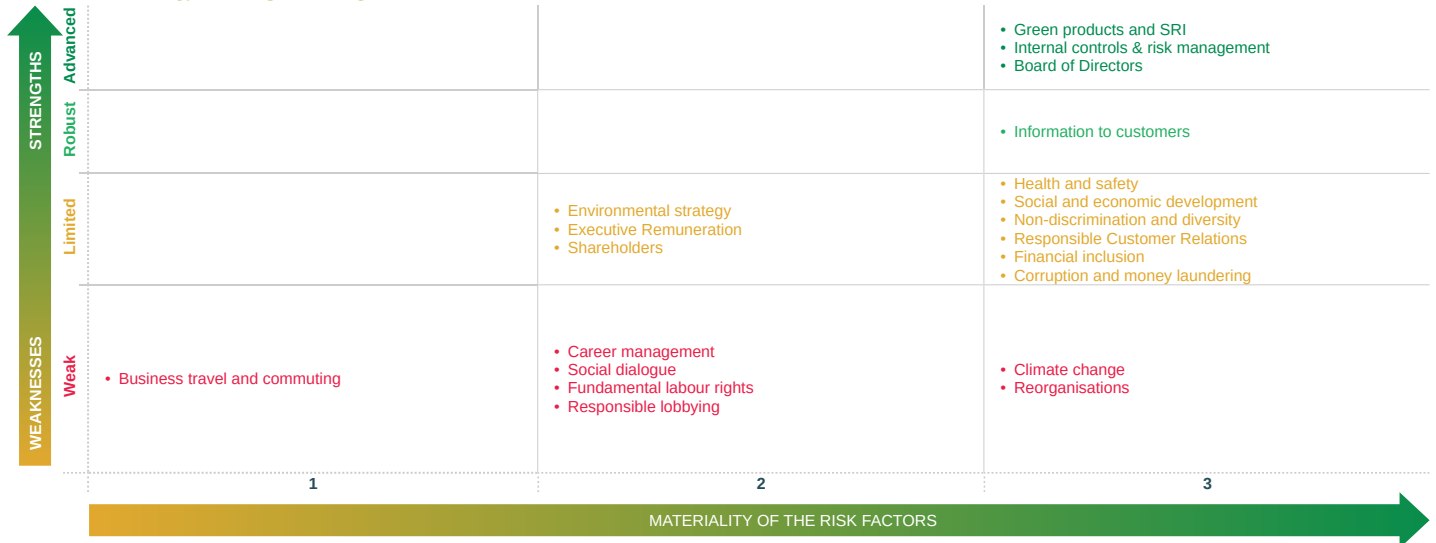


6 DOMAINS PERFORMANCE (/100)

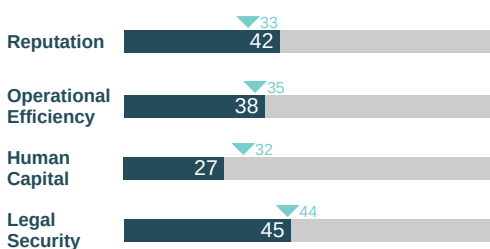


Management of risks and opportunities

MATERIALITY & PERFORMANCE MATRIX



RISK MITIGATION INDEX (/100)



ANALYST FOCUS

TOPIC	COMMENT	TREND
CSR Governance	The Company reports on allocating responsibilities over CSR issues at both management and Board Level, while also integrating these issues in the internal control system. However, its performance is lowered mainly due to insufficient information on the link between the Company's executives and its CSR performance.	
Social Pillar	Although the Company has issued commitments and reports on implementing various measures to address most of its social issues at stake, its performance is hindered due to its lack of transparency on related KPIs, which negatively affects the possibility of assessing performance trends over the years.	
Community Engagement	GF Mega has issued a formalised commitment and comprehensive policies to address the issue and reports on implementing various measures to promote investment to SME's and local community projects, while also cooperating with NGO's and promoting credit access to disadvantaged groups. However, it's performance could ameliorate with the reporting of related KPIs.	

(1) Performance level: weak (0-29/100), limited (30-49/100), robust(50-59/100), advanced (60-100/100)
(2) We assessed GF Mega at its request, in line with with our methodology of unsolicited rating. This assessment results in an absolute score of 38/100. Since GF Mega is not part our listed universe, this assessment does not result in a ranking against other listed companies. Therefore, the rankings and sector performance serve an indicative purpose only and should not be used for legal reporting.
(3) Ratings outline companies' domain performance within a sector, on a 5-level scale: "--", "-", "=", "+", "++"

Company performance in all the Sustainability Drivers

		Weight	Overall score 38/100		Trend	Score	Leadership	Implementation	Results
Environment						35	32	29	36
E	ENV1.3	3	Green products and SRI			68	65	75	65
E	ENV2.2	3	Climate change			14	0	0	43
E	ENV1.1	2	Environmental strategy			34	48	20	N/A
E	ENV2.7	1	Business travel and commuting			0	0	0	0
Human Resources						20	23	11	26
S	HRS2.3	3	Reorganisations			12	0	0	35
S	HRS3.2	3	Health and safety			34	53	28	22
S	HRS1.1	2	Social dialogue			14	0	0	43
S	HRS2.4	2	Career management			17	37	15	0
Human Rights						38	31	39	45
S	HRT2.4	3	Non-discrimination and diversity			49	51	65	32
S	HRT2.1	2	Fundamental labour rights			22	0	0	65
Community Involvement						47	62	41	39
S	CIN1.1	3	Social and economic development			47	69	30	42
S	CIN2.1	3	Financial inclusion			47	55	51	35
Business Behaviour (C&S)						39	44	22	50
S	C&S1.2	3	Information to customers			51	56	32	65
S	C&S1.3	3	Responsible Customer Relations			41	41	28	53
G	C&S3.1	3	Corruption and money laundering			43	65	21	43
G	C&S3.3	2	Responsible lobbying			12	0	0	35
Corporate Governance						51	53	42	57
G	CGV1.1	3	Board of Directors			62	50	64	71
G	CGV2.1	3	Internal controls & risk management			60	48	70	62
G	CGV3.1	2	Shareholders			39	67	9	41
G	CGV4.1	2	Executive Remuneration			33	53	0	46

■ Weak (0-29/100)
 ■ Limited (30-49/100)
 ■ Robust (50-59/100)
 ■ Advanced (60-100/100)



Involvement in allegations



Involvement in allegations with evidence of corrective measures

Peer Comparison

		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
MA0000012437	Bank of Africa	++	++	++	++	++	+	66
MA0000010811	BMCI	++	++	++	++	++	++	62
GRS014003024	Piraeus Bank	++	++	++	++	+	++	59
CLP1506A1070	Banco Santander Chile	+	++	++	++	++	++	58
INE528G01035	Yes Bank	++	+	+	++	++	+	57
BRSANBCDAM13	Banco Santander Brasil	++	++	+	++	+	++	56
GRS003003035	National Bank of Greece	+	++	+	+	+	+	52
ZAE000004875	Nedbank Group	++	+	++	+	=	++	51
COB07PA00078	BanColombia	++	+	+	+	+	++	50
TW0002887007	Taishin Financial Holdings	++	+	+	+	+	+	50
PHY0967S1694	Bank of the Philippine Islands	+	+	+	++	++	=	48
TW0002891009	CTBC Financial Holding	+	+	+	+	+	+	48
TW0002892007	First Financial Holdings	+	+	+	+	++	=	48
MA0000011884	Banque Centrale Populaire	+	+	++	+	+	=	46
GRS015003007	Alpha Bank	+	+	+	=	=	+	45
MA0000011926	Attijariwafa Bank	+	+	++	++	+	-	45
TRAGARAN91N1	Türkiye Garanti Bankasi	++	+	+	+	+	=	45
TH0015010000	Siam Commercial Bank	+	+	+	+	=	+	45
TREVKFB00019	Türkiye Vakıflar Bankasi	+	+	+	+	++	=	45
MXP370711014	Grupo Financiero Banorte	+	+	+	+	+	=	44
TW0002884004	E.Sun Financial Holdings	+	+	+	+	+	+	43
MYL1155OO000	Malayan Banking	+	=	+	+	+	+	42
TRAYKBNK91N6	Yapi ve Kredi Bankasi	+	=	++	+	+	=	41
MX41BS060005	Banco Santander Mexico	+	=	+	=	+	=	39
BRITSAACNPR7	Itausa	+	+	+	=	+	-	39
INE238A01034	Axis Bank	+	=	=	=	=	+	38
TW0002883006	China Development Financial Holdings	+	=	+	=	=	=	38
GRS323003012	Eurobank Ergasias Service	=	=	=	-	=	+	38
MYL5819OO007	Hong Leong Bank	=	=	=	=	=	+	38
CZ0008019106	Komerční Banka	=	+	=	=	=	=	38
TW0002886009	Mega Financial Holding	+	=	=	=	+	=	38
ZAE000109815	Standard Bank Group (South Africa)	=	=	=	=	=	+	38
KVE00001176	GF Mega	=	-	=	+	=	+	38
PHY077751022	BDO Unibank	=	=	=	=	+	=	37

		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
KR7105560007	KB Financial Group	=	=	=	=	=	+	37
KR7055550008	Shinhan Financial Group	+	=	+	=	-	+	37
TW0002890001	SinoPac Financial Holdings	+	=	+	=	=	+	37
TH0068010Z07	TMB BANK	+	=	=	=	+	=	36
CLP0939W1081	Banco de Chile	-	+	+	=	=	=	35
CLP321331116	Banco de Credito e Inversiones	=	+	=	+	=	=	35
KR7086790003	Hana Financial Group	=	=	=	+	=	=	35
CL0002262351	Itau CorpBanca	=	+	=	=	=	=	35
COB01PA00030	Banco de Bogota SA	=	=	=	=	=	=	34
ZAE000255915	Absa Group	=	=	=	=	-	+	34
KR7138930003	BNK Financial Group	=	=	+	=	=	=	34
TW0002801008	Chang Hwa Commercial Bank	=	=	=	-	=	=	34
AEN000101016	First Abu Dhabi Bank	=	=	=	=	=	=	34
INE001A01036	Housing Development Finance Corporation	=	-	=	=	=	+	34
TH0150010Z03	Krung Thai Bank	=	=	=	=	=	=	34
MA0000010381	CDM	=	=	=	-	=	=	33
MYL1023OO000	CIMB Group Holdings	-	=	=	-	=	+	33
INE115A01026	LIC Housing Finance	=	-	-	+	+	=	33
MYL1066OO009	RHB Bank	=	=	-	=	=	+	33
TRETHAL00019	Turkiye Halk Bankasi	=	=	=	-	-	=	33
TRAICTR91N2	Turkiye Is Bankasi	=	=	=	=	=	=	33
ID1000096605	Bank Negara Indonesia	-	=	=	=	=	=	32
EGS60121C018	Commercial International Bank Egypt	=	=	=	=	=	=	32
KR7139130009	DGB Financial Group	+	=	=	=	-	=	32
AEA000201011	Abu Dhabi Commercial Bank	-	=	=	-	=	+	31
TRAAKBNK91N6	Akbank	=	=	-	=	=	=	31
ID1000109507	Bank Central Asia	=	=	=	+	-	-	31
ID1000118201	Bank Rakyat Indonesia	=	=	=	=	=	=	31
ZAE000035861	Capitec Bank Holdings	-	=	-	=	=	+	31
TW0002880002	Hua Nan Financial Holdings	-	=	-	-	=	=	31
MYL2488OO004	Alliance Bank Malaysia	-	=	=	=	=	=	30
TH0001010006	Bangkok Bank	=	=	-	-	=	=	29
MYL1082OO006	Hong Leong Financial Group	=	-	-	-	=	+	29
TW0002834009	Taiwan Business Bank	=	=	-	=	=	-	29
ID1000095003	Bank Mandiri	-	=	=	-	=	-	28
PEP116001004	Banco BBVA Peru	=	-	=	=	=	-	28

		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
INE148I01020	Indiabulls Housing Finance	-	-	-	-	=	+	28
MYL1295OO004	Public Bank	-	=	-	-	=	+	28
RU000A0JP5V6	VTB Bank	=	-	-	=	=	=	28
CNE1000002M1	China Merchants Bank	-	-	-	=	-	=	27
BMG2519Y1084	Credicorp	-	-	-	=	=	=	27
INE090A01021	ICICI Bank	-	-	-	=	=	=	27
HU0000061726	OTP Bank	-	=	=	=	-	-	27
PHY6028G1361	Metropolitan Bank & Trust	-	=	-	-	-	=	26
MX01R0000006	Regional SAB de CV	-	-	=	=	=	-	25
CNE100000X44	Chongqing Rural Commercial Bank	=	-	-	=	-	-	25
CNE100001QW3	China Everbright Bank	=	-	-	-	--	-	24
KR7316140003	Woori Financial Group	-	=	=	=	-	--	24
KR7024110009	Industrial Bank of Korea	-	-	-	=	-	--	23
PAL2400671A3	Intercorp Financial Services	-	-	-	--	=	=	23
TW0005880009	Taiwan Cooperative Financial Holdings	=	-	-	-	--	-	23
MA0000011454	Credit Immobilier et Hotelier	-	-	-	-	=	--	21
XS0300998779	Russian Agricultural Bank	-	-	-	=	-	--	20
MXP370641013	Grupo Financiero Inbursa	-	-	-	-	-	--	18
QA000A0M8VM3	Masraf Al Rayan	-	-	-	-	--	-	18
XS0906946008	Gazprombank	-	-	-	-	--	-	15
AED000201015	Dubai Islamic Bank	-	-	-	--	--	--	14

General information

GF Mega operates in providing specialized financial solutions to small- and medium-sized enterprises in

Mexico and auto loans for individuals in the United States. The Company is headquartered in Mexico.

Selected financial data

Key data	Revenues	EBIT	Employees
2020	N/A	N/A	112
2019	MXN 1,092m	MXN 429m	123
2018	MXN 599m	MXN 84m	82
2017	MXN 429m	MXN 44m	73
2016	MXN 313m	MXN 56m	770

Main shareholders	2019
Jose Guillermo Romo de la Peña	78.1%
DEG	21.9%

Geographical Breakdown	Turnover 2019	Employees
Mexico	95.1%	N/A
United States	4.9%	N/A

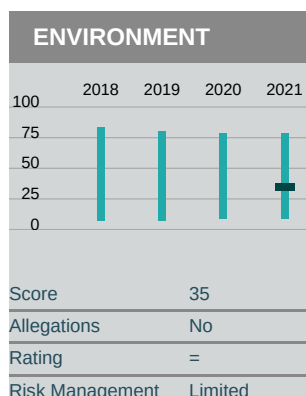
Main economic segment	Turnover 2019
Leasing	74%
Credit	21%
US Car Loans	5%

Selected ESG Indicators

	2020	2019
3 year trend for safety at work	N/A	N/A
Total CEO compensation / Average employee compensation	82.59	174.9
TCFD Signatory	No	N/A
Gender balance	45	44
Percentage of women on Board	29	29
3-year energy consumption trend (normalized to turnover)	N/A	N/A
Ratio of payments to employees vs. shareholders (3-year trend)	N/A	N/A
Percentage of independent Board members	57	N/A

■ Sector performance
■ Company performance
 Rating : min-- / max ++

CSR performance per domain

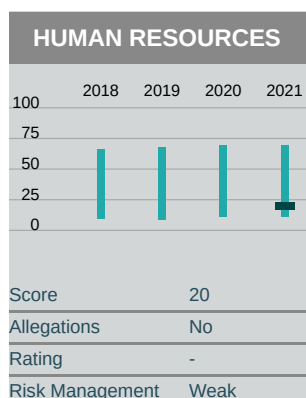


Key issues

The integration of environmental factors in the allocation of resources to companies and individuals is relevant to influence them towards more environmentally responsible behaviours. Financial institutions can also address their direct impacts by minimising the CO2 consumption of their own operations and by implementing an Environmental Management System.

Company performance

- GF Mega's performance in the Environment domain is limited in absolute terms.
- The Company has issued a formalised commitment towards environmental protection and reports on implementing a manual specifying the procedures and responsibilities allocated to promote the integration of environmental issues in its lending activities. A dedicated structure is responsible for overseeing environmental issues and employees attend awareness raising sessions on this regard. Additionally, the company reports on implementing a lending system for SME involved in agricultural exports and conducting risks assessment processes that covers environmental issues. The Company does not report on the efforts made to mitigate its impacts on climate change and to promote a sustainable mobility of its employees.



Key issues

Cost reduction strategies, including job cuts, affect the financial industry since after the financial crisis. This calls for banks to responsibly manage restructurings to mitigate social consequences for employees and safeguard their human capital base. The unstable external and internal environment, characterised by an increased work pressure, lack of job security and an increased demand for flexibility, requires an effective health & safety policy to deal properly with many stress factors.

Company performance

- GF Mega's performance in the Human Resources domain is weak in absolute terms.
- This is mainly linked to the lack of information on how the Company promotes social dialogue with employees representatives and on how the policies set to manage any possible reorganization in a responsible way. The Company has issued a formalised commitment towards health and safety and reports on implementing some measures to address mental health such as awareness raising programmes and flexible work opportunities, but related KPIs are not disclosed. Finally, as for its efforts to promote career management and employability, GF Mega has an internal job marketplace with detailed descriptions of each positions available to all employees. However, the company's turnover rate displays a negative trend over the past years and KPIs related to training are not disclosed.

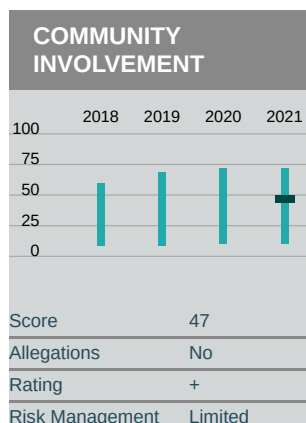


Key issues

The financial industry is characterised by a high-qualified workforce, with a high proportion of men in managerial positions and significant gender pay disparities. As a consequence, non-discrimination is a relevant issue for the sector.

Company performance

- GF Mega's performance in the Human Rights domain is limited in absolute terms.
- The Company has issued a formalised commitment towards non-discrimination and diversity that covers most categories and its backed up by the implementation of significant measures, such as awareness raising, monitoring, corrective procedures, flexitime initiatives and maternity and paternity payments above the statutory requirements. Although GF Mega does not disclose KPIs related to the inclusion of employees with disabilities, the share of women in management positions has remained stable over the past 3 years. However, the Company's performance in this domain is hindered by the low level of information on how it addresses the respect for freedom of association and collective bargaining.

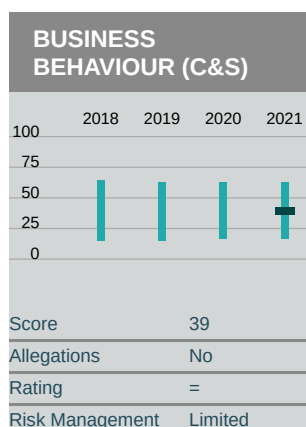


Key issues

The main role of banks is to enhance the social and economic development by supporting the real economy and to mitigate risks resulting from activities with negative impacts for society. As tax revenues are key for sustainable development, companies have the responsibility to ensure fairness and transparency in their tax strategies. Financial inclusion and the support of clients in financial distress are also a key responsibility for banks.

Company performance

- GF Mega's performance in the Community Involvement domain is limited in absolute terms.
- The Company has issued a formalised commitment towards the promotion of local social and economic development, which is backed by the implementation of few measures to address these issues, such as investment support to SME's and community projects, and cooperation with NGOs on local development. On the other hand, the Company also has issued a formalised commitment towards financial inclusion and reports on implementing credit access for disadvantaged groups and significant measures to manage the negative social impact of its services. However, the Company's performance in this domain is hindered due to its lack of transparency on related KPIs.



Key issues

Banks' responsibility is to provide comprehensive and suitable advice to customers on their products and associated risks, as well as to ensure fair relations with them. Cybersecurity and the protection of clients' information are emerging as key issues for a responsible management of clients and therefore recently included in the dedicated driver. Companies' effort to create an internal culture of responsible business conduct is also crucial in a sector that has been heavily affected by controversies related to unethical behaviour.

Company performance

- GF Mega's performance in the Business Behaviour domain is limited in absolute terms.
- The Company has issued a formalised commitment to adequately inform its costumers and to promote responsible relations. The commitment is backed by the implementation of some measures such as ensuring customers suitability, approval processes and awareness raising on responsible customer relations for the staff. GF Mega also commits to prevent corruption and money laundering, and reports on implementing a confidential reporting system to address these issues. Additionally, procedures to detect and follow up any suspicious activities have been defined. However, GF Mega does not disclose any quantitative data on the number or nature of corruption and money laundering incidents reported internally. The Company's performance in this domain is hindered to the Company's lack of transparency on how it promotes responsible marketing, protect cybersecurity and ensure transparency on its lobbying practices.



Key issues

Sound corporate governance is required to oversee a company's strategic direction, including the CSR strategy. Directors are notably evaluated on their level of diversity and experience with operational, financial, and CSR topics. The audit and internal controls system is examined regarding the efficiency and reach of its risk management. Shareholders are expected to have fair voting rights and access to all relevant information on emerging ESG risks. Executive remuneration is assessed for transparency and alignment with balanced stakeholder interests.


Company performance

- GF Mega's performance in the Corporate Governance domain is limited in absolute terms.
- The Board is 57% independent and CSR issues are reviewed at Board meetings. The Audit Committee has a comprehensive role and limited measures in terms of CSR risks covered by the internal control system are in place, but there is no evidence of measures implemented in terms of governance of risks. In terms of Shareholders, voting rights are ensured and relevant CSR issues are presented to shareholders and investors, but major restrictions have been identified to add items to the agenda of the AGM and to convene an EGM. Finally, information on executive remuneration is insufficient on the performance rules linked to variable remunerations.

CSR performance per criterion

Detailed Analysis

Environment	12
ENV1.1 Environmental strategy	12
ENV1.3 Development of green products and services	14
ENV2.2 Minimising environmental impacts from climate change	15
ENV2.7 Management of environmental impacts from transportation	16
Human resources	17
HRS1.1 Promotion of labour relations	17
HRS2.3 Responsible management of restructurings	19
HRS2.4 Career management and promotion of employability	20
HRS3.2 Improvement of health and safety conditions	22
Human rights	24
HRT1.1 Respect for human rights standards and prevention of violations	24
HRT2.1 Respect for freedom of association and the right to collective bargaining	25
HRT2.4 Non-discrimination	27
Community involvement	29
CIN1.1 Promotion of the social and economic development	29
CIN2.1 Societal impacts of the company's products / services	31
Business behaviour (C&S)	33
C&S1.2 Information to customers	33
C&S1.3 Responsible Customer Relations	35
C&S3.1 Prevention of corruption and money laundering	37
C&S3.3 Transparency and integrity of influence strategies and practices	40
Corporate governance	42
CGV1.1 Board of Directors	42
CGV2.1 Audit & Internal Controls	44
CGV3.1 Shareholders	46
CGV4.1 Executive Remuneration	48

 Involvement in allegations  Involvement in allegations with evidence of corrective measures

Environment

Score: 35

ENV1.1 Environmental strategy

(score: 34, weight: 2)



Visibility of the commitment to environmental issues

The company has issued a formalised commitment to environmental protection in its Environmental Protection & Social Commitment Policy.

Relevance of environmental strategy

The company commits to some of its responsibilities in terms of environmental protection:

- Measuring and monitoring direct environmental impacts
- Minimising environmental impacts from transportation
- Introducing environmental factors in the credit risk assessment
- Incorporate ESG considerations in investments strategies
- Reducing indirect impact on climate change, through credit/ lending activity

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, there is a dedicated structure responsible for this issue.

The company reports on having an Environmental & Social Responsibility Committee that is responsible for overseeing environmental issues. Additionally, a coordinator is responsible for implementing the Environmental & Social Management System that reports directly to the Risk Committee.

Means allocated to environmental management system

The company has allocated limited resources to environmental management.

- Environmental manual specifying procedures and responsibilities
- Internal audits that assess the effectiveness of the EMS
- Management review of the EMS (at Executive Level)
- Environmental performance measured against targets
- External verification of reporting on environmental performance

- Environmental manual specifying procedures and responsibilities: The company reports on having an Environmental & Social Management System Handbook in order to promote the integration of these issues in its lending activities.

Means allocated to employees environmental engagement

The company has set up some employees environmental engagement initiatives.

- Awareness raising
- Training on ways to reduce their environmental impact in their daily operations
- "Green teams" or environmental dedicated task forces
- Remuneration based on environmental performance (bonuses and awards)

- Awareness raising: The company reports that its employees awareness raising

sessions as part of its training on the SGAS lending handbook.

Coverage of certified environmental management systems

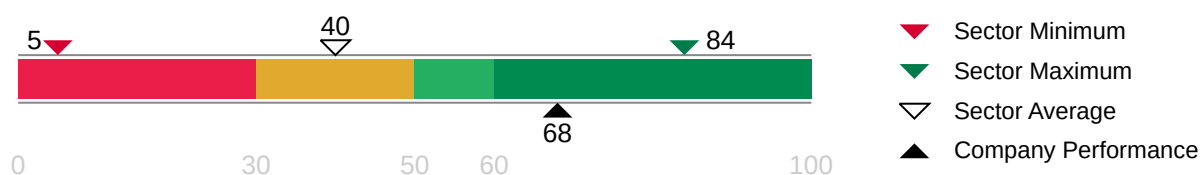
Information obtained from company and public sources regarding the share of the sites/offices that have a certified environmental management system is insufficient.

Leadership	48
Visibility	65
Relevance	30
Ownership	65

Implementation	20
Means & resources	30
Coverage	0

ENV1.3 Development of green products and services

(score: 68, weight: 3)



Relevance of the company's commitment to integrate environmental issues in its lending and investment activities

*The company discloses policies on sensitive sectors and/or cross-sectoral environmental policies:
- The company is a signatory of the Equator Principles III*

Ownership of the commitment

The commitment applies throughout the company, supported by the senior management. In addition, specific units/ teams within the concerned departments are involved in the implementation of the policy

The company reports on having an Environmental & Social Responsibility Committee that is responsible for overseeing environmental issues. Additionally, a coordinator is responsible for implementing the Environmental & Social Management System that reports directly to the Risk Committee.

Means allocated to integrate environmental standards in the company's lending to individuals and/or SMEs

The company offers some investment and/or financing products to clients. In addition, the company has developed a methodology to assess environmental risks in its lending activities

The company reports on implementing a lending system for SME involved in agricultural exports. Additionally, the company reports on conducting a risks assessment process that covers environmental issues for all its lending activities.

Coverage of the measures in place to integrate environmental issues in the company's lending to individuals and/ or SMEs

The company has allocated these means into all of its credit assessments.

Stakeholders' feedback

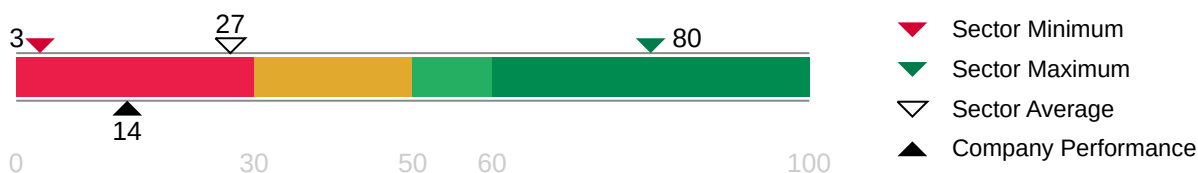
A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership	65	Implementation	75	Results	65
Relevance	65	Means & resources	65	Performance	65
Ownership	65	Coverage	100		

ENV2.2 Minimising environmental impacts from climate change

(score: 14, weight: 3)



Relevance of the company's commitment to reduce its energy consumption/ CO2 emissions

The company does not disclose any commitment with regard to its energy consumption/ CO2 emissions

Means allocated to reduce the company's own energy consumption and CO2 emissions

Information obtained from company and public sources regarding means allocated to reducing energy consumption and/or related emissions is insufficient

Coverage of the means in place to reduce the company's own energy consumption and CO2 emissions

Information obtained from company and public sources regarding the percentage of sites covered by such actions is insufficient

Performance indicators on the company's own CO2 emissions related to energy consumption

Information obtained from company and public sources regarding CO2 emissions linked to energy consumption is insufficient

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

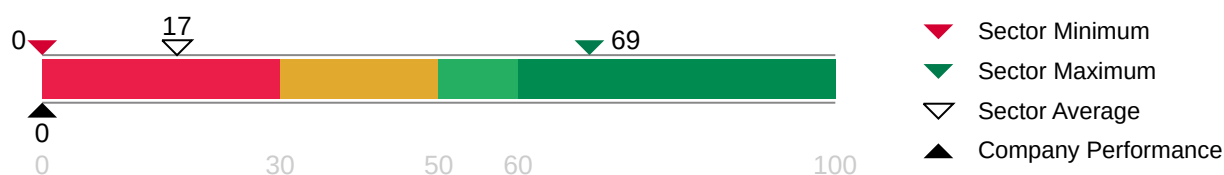
Leadership	0
Visibility	0

Implementation	0
Means & resources	0
Coverage	0

Results	43
Performance	0
Trends	65

ENV2.7 Management of environmental impacts from transportation

(score: 0, weight: 1)



Relevance of the company's commitment with regard to the environmental impacts related to the transport of its products and/or personnel

The company does not disclose any commitment with regard to the environmental impacts related to the transport of its products and personnel.

Means allocated to minimising the environmental impacts

Information obtained from company and public sources regarding means allocated to minimising the environmental impacts related to the transport of its personnel is insufficient.

- Measures to reduce pollution (car maintenance, alternative fuels, driver training, etc.)
- Rationalisation of transport flows (promotion of conference calls, train travels, etc.)
- Improvement of personnel transport mix/commuting (promotion of public transport, cycling, financing job tickets, car sharing, etc.)
- Cooperation with local authorities (involvement in transport infrastructures, mobility plans, etc.)

Coverage

Information obtained from company and public sources regarding the percentage of sites/products covered by such actions is insufficient.

Energy consumption or CO2 emissions related to transportation

The company does not monitor energy consumption or CO2 emissions from transportation.

Trend in transport mix

The company does not report the breakdown of the different modes of transport uses internally.

Leadership	0
Relevance	0

Implementation	0
Means & resources	0
Coverage	0

Results	0
Performance	0
Trends	0

Human resources

Score: 20

HRS1.1 Promotion of labour relations

(score: 14, weight: 2)



Visibility of commitment The company does not disclose any commitment to promote labour relations.

Relevance of commitment The company does not disclose any commitment to promote labour relations.

Ownership of commitment The company does not disclose any commitment to promotion of labour relations.

Coverage of employee representative bodies Information obtained from company and public sources regarding the percentage of sites where employee representation structures are in place is insufficient.

Subjects covered by collective bargaining Information obtained from company and public sources regarding the subjects covered in collective bargaining is insufficient.

- health & safety
- CSR issues
- remuneration
- working hours
- training
- career development
- work time flexibility
- age conscious human resources management
- stress management
- equal opportunities

Employee representative bodies in countries with restrictive legislation Information obtained from company and public sources regarding how the company promotes employee representation in countries with restrictive legislations is insufficient.

Stakeholders' feedback A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Coverage of collective agreements on working conditions Information obtained from company and public sources, regarding the percentage

of the company's employees covered by collective agreements on working conditions, is insufficient.

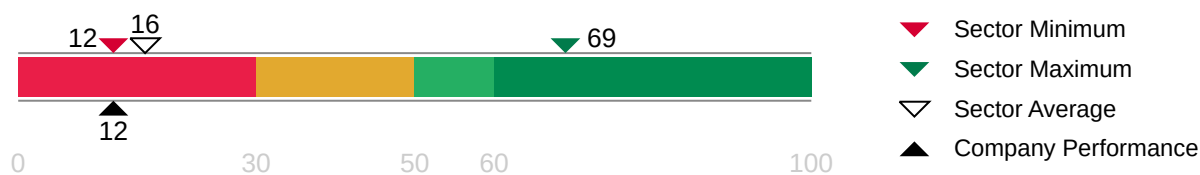
Leadership	0
Visibility	0
Relevance	0
Ownership	0

Implementation	0
Means & resources	0
Scope	0
Coverage	0

Results	43
Performance	43

HRS2.3 Responsible management of restructurings

(score: 12, weight: 3)



Relevance of commitment to manage reorganisations responsibly

The company does not disclose any commitment to manage reorganisations responsibly.

Involvement with employee representatives

The company does not disclose any commitment to inform and consult employee representatives on reorganisations.

Means allocated to prevent and manage reorganisations

Information obtained from company and public sources regarding measures allocated to prevent and manage reorganisations is insufficient.

- significant financial compensation
- early retirement
- outplacement services
- individualised follow-up of employees
- reduction of labour time
- internal mobility programme
- re-training

Coverage

Information obtained from company and public sources regarding the percentage of sites where such measures are taken is insufficient.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

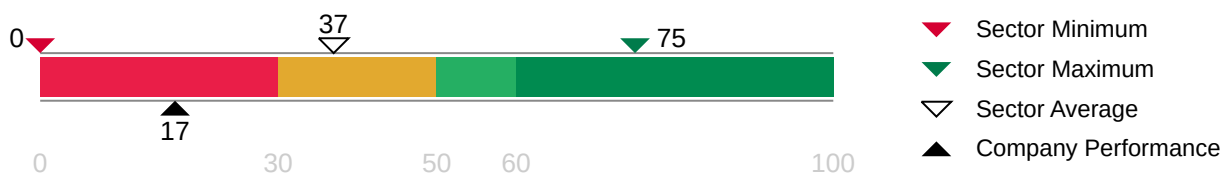
Result of the company's commitment to manage reorganisations responsibly

The company does not provide any information on the impacts of reorganisations on employment.

Leadership	0	Implementation	0	Results	35
Relevance	0	Means & resources	0	Performance	35
Ownership	0	Coverage	0		

HRS2.4 Career management and promotion of employability

(score: 17, weight: 2)



Visibility of commitment

The company has issued a formal commitment to promote career management and training, but it is not published publicly.

The company has issued a formal commitment to promote career management and training in its Academic Studies Support Policy and 360° Assessment Policy.

Relevance of commitment

The company's commitment to promoting career management and training only addresses part of its responsibilities:

- Anticipate short and long-term employment needs and skill requirements
- Adapt employees' skill sets to their career paths
- Elaborate individual development plans
- Promote age conscious training and development

Ownership of commitment

The Head of HR is part of the company's Board or Executive Committee. However line managers do not appear to be evaluated on their performance in terms of HR management.

The company reports that managers and key personnel are evaluated by external agencies specialized in Human Resources and the results are shared directly to the General Director who in turn shares the results with the Remuneration Committee.

Career management systems

The company has set up an internal job opportunity marketplace and/or has formalised the skill requirements for the various job positions.

The company reports that when it is required to hire personnel, the Manager, Director or Director of the area, must have the job description and fill out the personnel requisition form.

Coverage of career management systems

There is no evidence that the career management systems reported cover a majority of the company's employees.

Types of training provided to non-managers

Information obtained from company and public sources regarding training programmes offered to employees is insufficient.

Of note, the Company informed V.E that various types of training are implemented, but there is no evidence nor details provided in their Academic Studies Support Policy.

Means allocated to training for all employees

Information disclosed on performance indicators related to training per employee is insufficient.

Mobility / turnover

The company's employee turnover rate has increased by 13 percentage points over the past three years, from 5% in 2018 to 18% in 2020.

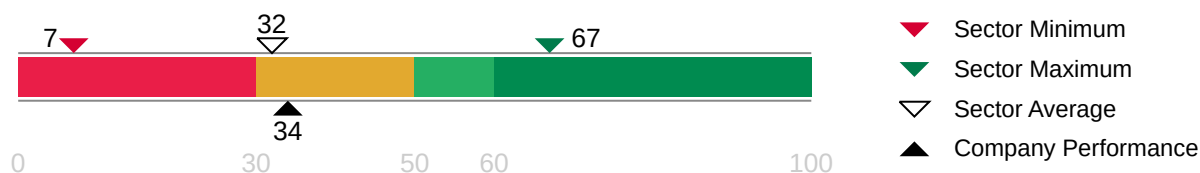
Training delivered during the year under review

The company does not report on the total percentage of employees having received training over the course of the year under review.

Leadership	37	Implementation	15	Results	0
Visibility	65	Means & resources	10	Performance	0
Relevance	30	Coverage	30		
Ownership	30				

HRS3.2 Improvement of health and safety conditions

(score: 34, weight: 3)



Visibility of health & safety commitments

The company has made a formalised commitment to health and safety issues in its:

The company has made a formalised commitment to health and safety issues in its Psychosocial Risk Factors at Work Policy and Health Policy

Relevance of commitment

The company's commitment addresses its main responsibilities:

- ensure awareness about health and safety issues
- reduce the number of work accidents and their severity
- prevent occupational disease
- reduce stress/promote well-being
- improve ergonomics
- reduce the rate of absenteeism

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Means allocated to health and safety

Information obtained from company and public sources regarding means allocated to health and safety is insufficient.

- training/awareness raising programmes
- internal monitoring
- risk assessments
- internal H&S audits
- H&S competitions
- remuneration based on H&S performance
- ISO 45001 / OHSAS 18001 certifications

Coverage of health and safety system

Information obtained from company and public sources regarding the percentage of employees that benefit from health and safety training and/or audits is insufficient.

Means allocated to reduce stress at work

The health programs are mainly concerned with the treatment, rehabilitation and recovery process of individuals.

- Employee assistance programme / hotline (stress only)/counselling
- Job redesign (work organisation)
- Training on stress for managers
- Monitoring of absenteeism/rate of occupational disease; assessment of stress

through analysis of internal H&S data

- Awareness campaigns and information
- Training on stress for employees
- Measures to improve ergonomics
- Detection of stress: Identification of stress sources/risks assessments
- Avoidance of overtime
- Employee oriented flexibility (work/life balance)
- Employee participation tools (opinion surveys, dedicated teams, workshops)

- Awareness campaigns and information: The company reports that an awareness raising campaign has been implemented, addressing topics such as the main psychosocial diseases and the related preventive measures.
 - Employee oriented flexibility (work/life balance): The company reports on having a Home Office Policy that allows employees to work remotely when there is need for child or elder care.

Coverage of means allocated to address mental health

The mental health and safety measures cover a majority of the company's employees.

Accident frequency rate

The company does not disclose quantitative data on accident frequency rates.

Other health and safety indicators

The company does not disclose quantitative data on occupational disease rates.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership		Implementation		Results	
Visibility	65	Means & resources	0	Performance	22
Relevance	65	Scope	30		
Ownership	30	Coverage	37		

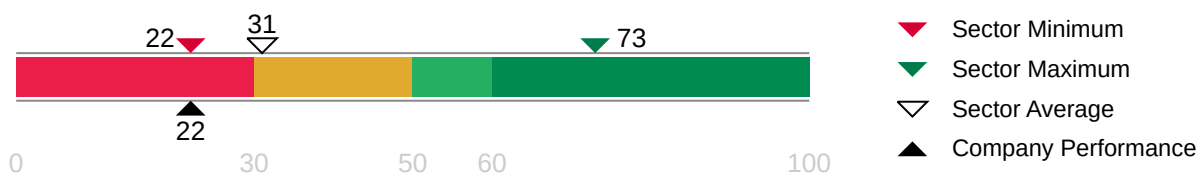
Human rights

Score: 38

HRT1.1 **Respect for human rights standards and prevention of violations**
(deactivated)

HRT2.1 Respect for freedom of association and the right to collective bargaining

(score: 22, weight: 2)



Visibility of commitment

The company does not disclose any commitment to freedom of association and the right to collective bargaining.

Relevance of commitment

The company does not disclose any commitment to freedom of association and the right to collective bargaining.

- Respect and protection of freedom of association and the right to organize (ILO C87)
- Respect of the right to collective bargaining (ILO C98)
- Respect and protection of workers' representative (ILO C135)
- Prevent workers' representative discrimination
- Guarantee the effective exercise of the trade union rights in the workplace

Ownership of commitment

The company does not disclose any commitment to freedom of association and the right to collective bargaining.

Monitoring

It is not clear what steps the company takes to ensure that freedom of association is respected throughout the company's operations (e.g.: through external verification, risk mapping, audits, etc.)

- occasional risk mapping
- occasional internal audits
- on-going monitoring of labour rights risks
- regular internal audits
- external audits/verification
- external investigation of allegations
- cooperation with unions: joint audits, joint grievance procedures etc.

Promotion of collective bargaining

Information obtained from company and public sources regarding measures in place to inform employees about their trade union rights is insufficient.

Coverage

Information obtained from company and public sources the percentage of the company where such labour rights systems and programmes are in place is insufficient.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership	0
Visibility	0
Relevance	0
Ownership	0

Implementation	0
Means & resources	0
Coverage	0

Results	65
Performance	65

HRT2.4 Non-discrimination

(score: 49, weight: 3)



Visibility of commitment

The company has issued a formalised commitment to non-discrimination in its Diversity & Inclusion Policy.

Relevance of commitment

The company's commitment to non-discrimination explicitly defines most of the categories covered:

- gender
- sensitive medical conditions
- trade union membership or activities
- other (please define)
- race / ethnicity / nationality
- social background
- religion
- sexual orientation
- family responsibilities (including pregnancy)
- disabilities
- political opinion
- age

- Other: Language

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

The company's Ethic and Conduct Committee is held responsible for overseeing the implementation of the commitment.

Means allocated

The company has set up significant measures to prevent discrimination and promote diversity:

- awareness raising
- maternity pay (greater than the statutory requirement)
- paternity pay (greater than the statutory requirement)
- job sharing initiatives
- child care facilities/child care subsidies
- training
- monitoring
- confidential reporting system / grievance procedures
- disciplinary procedures / corrective measures
- affirmative action programmes
- flexitime
- monitoring of salary disparities

career break opportunities

- Awareness raising: The company conducts awareness raising on diversity in the framework of the training on its Code of Ethics & Conduct.
- Monitoring: The company reports on monitoring the percentage of women in its total workforce.
- Confidential reporting system / grievance procedures: The company reports on having a confidential channel for reporting activities identified as non-compliant with its Code of Ethics & Conduct.
- Disciplinary procedures / corrective measures: The company reports that the Human Resources Management is responsible for implementing corrective measures when breaches or violations to the Code of Ethics & Conduct have been reported and identified.
- Flexitime: The company reports on having a Home Office Policy that allows employees to work remotely when there is need for child or elder care.
- Maternity/paternity pay (greater than the statutory requirement): the company reports that it provides additional 10 days to the statutory requirement for both mothers and fathers.

Coverage

The company has set up programmes to promote diversity (eg: training, awareness-raising, etc.) in a majority of its operations.

Results in terms of gender distribution

The share of women in management positions remained stable over the past three years.

The share of women in management positions has remained stable over the past three years, to stand at 10% in 2020.

Results in terms of employment of persons with disabilities

The institution does not disclose quantitative data on performance indicators such as the share of employees with disabilities in the total workforce.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership	51
Visibility	65
Relevance	65
Ownership	30

Implementation	65
Means & resources	65
Coverage	65

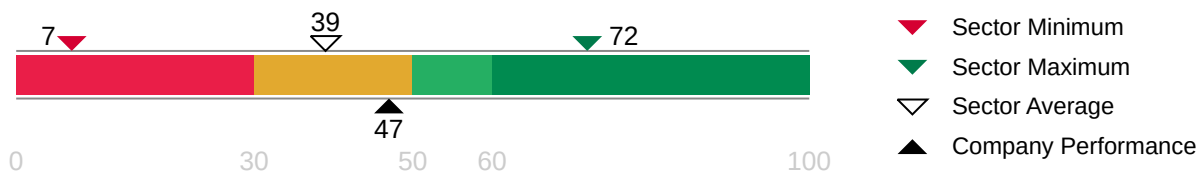
Results	32
Performance	65
Trends	15

Community involvement

Score: 47

CIN1.1 Promotion of the social and economic development

(score: 47, weight: 3)



Visibility of the commitment to support local development

The company has issued a formalised commitment to the promotion of local social and economic development in its:

Code of Ethics & Conduct and Environmental & Social Management System Handbook.

Relevance of the commitment

The company's commitment to promote local social and economic development addresses all of its responsibilities:

- Promote local entrepreneurship through SME financing
- Support to community investments
- Implement a responsible tax strategy (as a company)
- Encourage responsible tax practices by clients (as tax services providers)

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

The company's Ethic and Conduct Committee is held responsible for overseeing the implementation of the commitment.

Means allocated

The company has allocated few means to address social and economic development, including:

- Support to SME's and/or business start-ups (investment, logistical support, training, advices)
- Impact investing actions (dedicated social impact funds, social bonds, social/ societal investments)
- Support local development through investee companies (for ex. thematic investment funds, private equity, etc.)
- Support to public and/or community development/investments
- Support to micro-finance providers (through, for ex. dedicated investment vehicles)
- Cooperation with NGO's or other relevant stakeholders on local development
- Support the financial infrastructure in developing countries

- Support to SME's and/or business start-ups: The company reports on implementing the MATI programme, which aims to promote women led SME's by providing marketing and commercial support. The programme also works closely with the company's Mega DA+ initiative, which consists of a thematic fund for projects that promote the inclusion of women.
- Support to public and/or community development/investments: The company reports that its MATI programme is targeted towards community investment projects.

- Cooperation with NGO's or other relevant stakeholders on local development: GF Mega reports that it cooperates with the Guadalajara Foundations Cooperative, which have been participants of the MATI programme.

Geographical coverage

These means are allocated in a minority of company sites.

Trend of indicators measuring the "impact" of the company's community development engagement

Information obtained from company and public sources regarding the quantitative outcomes of local social and economic development projects is insufficient to determine a trend.

Transparency of tax reporting

The company reports only on gross taxes paid. There is no breakdown on a regional or country basis.

- taxes paid in some countries of operations
- taxes paid in some regions of operations
- taxes paid in key regions of operations
- taxes paid in key countries of operations
- sales per zone
- operating profit per zone
- number of employees per zone
- ratio between tax paid and headline corporate tax rate per zone
- explanation for significant differences between tax rate actually paid and expected tax rate

Presence in IMF 'offshore financial centers' and/ or in jurisdictions considered by the OECD as not compliant enough with tax transparency rules

The Company does not operate in any location considered by the IMF as 'offshore financial centres' and/ or in jurisdictions considered by the OECD as not compliant enough on tax transparency rules

The company's operations are based only in Mexico and the United States.

Stakeholders' feedback

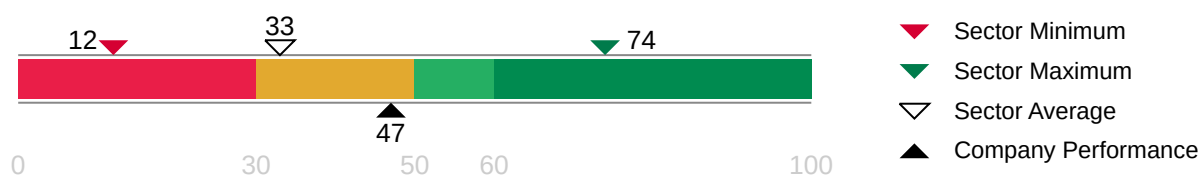
A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership	69	Implementation	30	Results	42
Visibility	65	Means & resources	30	Performance	57
Relevance	100	Coverage	30	Trends	0
Ownership	30				

CIN2.1 Societal impacts of the company's products / services

(score: 47, weight: 3)



Visibility of the company's commitment to promote financial inclusion

The company has issued a formalised commitment to address the accessibility of its products/services in its:

Code of Ethics & Conduct and Credit Handbook.

Relevance of commitment

The company's commitment addresses most of its responsibilities:

- promote access to basic banking services for weaker customers
- promote access to credit for weaker customers
- support customers in financial distress
- prevent clients' discrimination

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

The company's Ethic and Conduct Committee is held responsible for overseeing the implementation of the commitment.

Means allocated to promote access to basic financial services:

The company has allocated few measures to promote access to basic financial services

- Access to basic banking services
- Access to credit
- Financial education (to community at large)
- Systems to prevent the discrimination of customers
- Specific training for sales personnel
- Development of expertise through cooperation with stakeholders (long term and stable partnerships)

- Access to credit: The company reports that it promotes financial inclusion in the implementation of the MATI and Mega Da+ programmes, both aimed to develop financial inclusion for women.

Means question on programs to support customers in financial distress

The company has allocated significant measures to manage the negative social impact of its products/services

- Monitoring of weaker customers (early warning system)
- Specific product training for sales personnel
- Support programs in case of financial distress (debt restructuring)
- Specialised departments/business units
- Development of expertise through cooperation with stakeholders

- *Monitoring of weaker customers (early warning system):* The company reports that the Collection Board gathers each Monday to monitor and identify weak costumers.
- *Specific product training for sales personnel:* The company reports that the commercial team receives training on its various financial services.
- *Support programs in case of financial distress (debt restructuring):* The company's Restructurings Committee is responsible for monitoring restructurings in the clients activities and provide them with financial solutions. Additionally, GF Mega reports that during the pandemic crisis clients with good payment historial received the possibility to take financial solutions for work capital.
- *Specialised departments/business units:* The company reports on having a Restructurings Committee responsible for monitoring restructurings in the clients activities.

Coverage of means allocated to promote access to basic financial services:

These means are allocated in the majority of the company sites

Trend of indicators measuring company efforts to promote financial inclusion

The company does not disclose indicators on financial inclusion

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

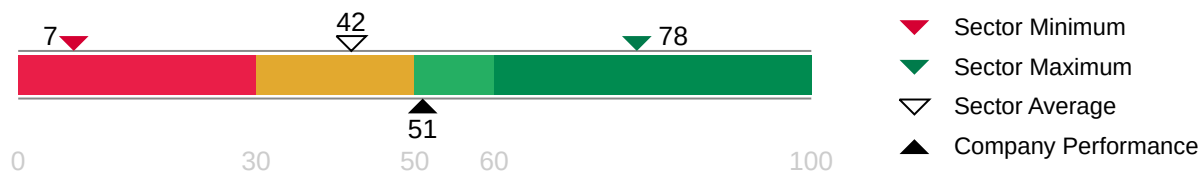
Leadership	55	Implementation	51	Results	35
Visibility	65	Means & resources	48	Performance	65
Relevance	65	Coverage	65	Trends	0
Ownership	30				

Business behaviour (C&S)

Score: 39

C&S1.2 Information to customers

(score: 51, weight: 3)



Visibility of commitment to adequately informing customers about products/ services

The company has issued a formalised commitment to adequately inform customers about its products/services in its:

Code of Ethics & Conduct

Relevance of the commitment

The company's commitment addresses its main responsibilities:

- provide customers with detailed information about product risks/benefits
- ensure that suitable products are sold to clients (products in line with their risk profile)
- avoid misleading marketing messages
- avoid mis-selling practices
- avoid coercive tied selling/inertia selling

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

The company's Ethic and Conduct Committee is held responsible for overseeing the implementation of the commitment.

Systems to monitor information to customers

The company has set up few measures to ensure customers are informed properly:

- educational tools at disposal of customers
- initiatives directly addressing transparency also in cooperation with stakeholders
- procedures to approve/monitor marketing and/or contracts material internally or externally
- systems to overcome information asymmetry (i.e. comparison tools)
- ensuring customers' suitability
- products approval processes

- Ensuring customers' suitability: GF Mega reports on having a database for Potential Clients, which is adjusted to criteria based on market conditions and the client's profile. The database is updated monthly.
- Products approval processes: The company communicates to customers the details of the different types of approval processes and their conditions in its Credit Manual.

Employees training and awareness raising

Information obtained from company and public sources regarding responsibility in marketing and commercial practices is insufficient.

Coverage of systems to monitor information to customers

The company has set up such systems throughout the company

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

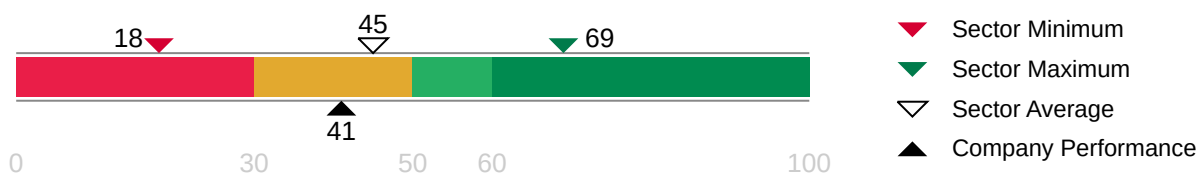
Leadership	56
Visibility	65
Relevance	65
Ownership	30

Implementation	32
Means & resources	17
Coverage	65

Results	65
Performance	65

C&S1.3 Responsible Customer Relations

(score: 41, weight: 3)



Visibility of commitment to responsible customer relations.

The company has issued a formalised commitment to responsible customer relations in its:

Code of Ethics & Conduct

Relevance of commitment

The company commits to some of its responsibilities.

- prevent unfair contract terms
- enhance customer satisfaction
- listen to customers' complaints
- cooperate with consumer associations to improve banking services
- protect clients' information assets

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

The company's Ethic and Conduct Committee is held responsible for overseeing the implementation of the commitment.

Means allocated to ensure responsible relations with customers

The company has set up few measures:

- staff awareness and training
- measuring performance against customer satisfaction surveys and be acting on the results
- linking the remuneration of sales staff to customers' satisfaction
- cooperating with consumer association on customers related topics (fairness of contracts, for ex.)

- Staff awareness and training: The company reports on providing training on customer relations to its employees as part of the Code of Ethics & Conduct's training.

Complaints management system for customers

There is a formalised and accessible system to handle complaints.

Coverage of means allocated to ensure responsible relations with customers

The company has set up such systems throughout the company

Means allocated to address cyber security and to protect key information assets

Information obtained from company and public sources regarding measures to ensure that customers are treated appropriately and are allowed to complain and

receive adequate assistance is insufficient

- There is a chief information security officer (CISO) that sets the security strategy and initiatives
- The CISO has a direct reporting relationship with the CEO
- The CISO regularly briefs the board on cybersecurity strategy
- An incident management plans (including disaster recovery and business continuity) is established
- There is security team and a dedicated security budget
- Effective communication/ training of security requirements is provided to all employees
- Preventive measures
- ISO 27001 certification

Of note, the company reports on having an Information Security Policy overseen by a Systems Management team, but the policy does not provide details on the budget dedicated to cyber security.

Trend of complaints received

The company does not disclose the number of customers' complaints received.

Stakeholders' feedback

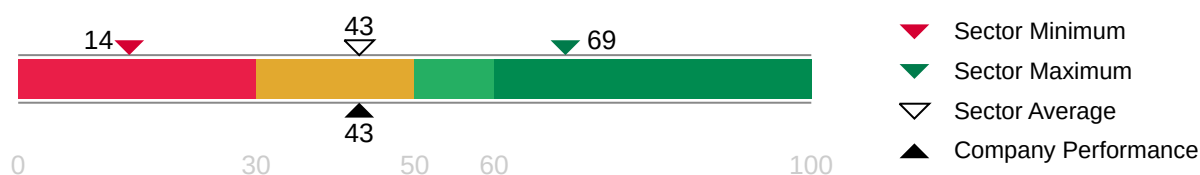
A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership	41	Implementation	28	Results	53
Visibility	65	Means & resources	19	Performance	65
Relevance	30	Coverage	65	Trends	0
Ownership	30				

C&S3.1 Prevention of corruption and money laundering

(score: 43, weight: 3)



Visibility of commitment on business ethics and money laundering

The company has issued a formalised commitment to preventing business ethics risks in its Code of Ethics & Conduct and in its Money Laundering Prevention Handbook.

Relevance of commitment

The company's commitment addresses its main responsibilities:

- giving / receiving bribes
- money laundering
- funds derived from suspicious activities
- gifts and invitations
- extortion
- fraud
- avoid financing oppressive corrupt regimes
- conflicts of interest
- illegal financing of political parties
- prohibition of facilitation payments
- restriction of facilitation payments

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved.

The company's Ethic and Conduct Committee is held responsible for overseeing the implementation of the commitment. Additionally, the company reports on having a Compliance Officer and a Communication and Control Committees responsible for overseeing compliance in terms of overseeing money laundering.

Involvement of employees on business ethics

The company has instituted awareness-raising programmes for employees on business ethics risks prevention and management.

The company reports that its employees attend to awareness raising sessions on corruption as part of its training on the Corporate Integrity and Ethics Code training.

Means allocated (business ethics)

The company has set up reporting systems to prevent business ethics risks that include:

- internal audits (internal verification of compliance with the company's code of conduct etc.)
- approval procedures for gifts, etc. by an independent department
- the possibility to contact internal audit, legal or compliance departments directly & confidentially
- a dedicated confidential hotline or email address

- external audits (by an independent, external specialised organisation) AND/OR external investigations of allegations
- risk assessment of company vulnerability

- A dedicated confidential hotline or email address: The company reports on having a confidential channel for reporting activities identified as non-compliant with its Integrity and Ethics Code.

Coverage (business ethics)

The measures implemented cover all significant parts of the company

Means allocated (money laundering)

The company has set up some measures to prevent money laundering that include:

- measures to establish the identity of its clients and identify the customers whose circumstances warrant additional diligence (e.g. PEPs identification)
- development of risk assessment policies (e.g. on company structures, the customer's reputation, source of wealth/funds, involvement in public contracts, expected account activity)
- updating of customers database on a regular basis to ensure consistency and completeness and appropriate record-keeping
- procedures for identification of and follow up on unusual or suspicious activities
- a dedicated confidential hotline or e-mail address
- involvement of relevant senior managers in decisions on entering or maintaining high-risk business relationships
- thorough assessment for jurisdictions with higher level of organised crimes, AML/CTF deficient legislations

- Measures to establish the identity of its clients and identify the customers whose circumstances warrant additional diligence: The company reports that during the identification of clients and users it ensures that these are not linked to financing terrorism or political exposed persons (PEP).

- Procedures for identification of and follow up on unusual or suspicious activities: The company reports on having a Compliance Officer that coordinates follow up activities and the implementation of subsequent investigations. Based on the investigations' evidence, the Communication and Control Committee is responsible for determining whether the operation is identified as unusual or internally concerning.

- A dedicated confidential hotline or email address: The company reports on having a confidential channel for reporting activities identified as non-compliant with its Integrity and Ethics Code.

Coverage (money laundering)

The measures implemented cover all significant parts of the company.

Reporting (business ethics and money laundering)

The company does not disclose any quantitative data on the number or nature of corruption and/or money laundering incidents reported internally.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership	65	Implementation	21	Results	43
Visibility	65	Means & resources	17	Performance	43
Relevance	65	Coverage	30		
Ownership	65				

C&S3.3 Transparency and integrity of influence strategies and practices

(score: 12, weight: 2)



Visibility towards stakeholders

The visibility of the company's commitment to ensuring transparency and integrity of lobbying practices is insufficient.

Comprehensiveness of the commitment

The company does not disclose any commitment to ensuring transparency and integrity of lobbying practices.

- to prevent any contrast with public international conventions (UN, ILO, OECD)
- not obtain or try to obtain information, or any decision, dishonestly
- not to misrepresent themselves to mislead third parties and/or staff of public authorities
- openly declare the company's business interests
- ensure that information provided is up-to-date, complete and not misleading
- not induce staff of PA to contravene rules of behaviour applicable to them
- if the company employs former staff of PA, to respect their obligation of confidentiality
- to be transparent on the amounts of donations to political parties/organisations

Ownership of commitment

The company does not disclose any commitment to ensuring transparency and integrity of lobbying practices.

Involvement of employees

Information regarding the involvement of employees in ensuring transparency and integrity of lobbying practices is insufficient.

Measures allocated

Information regarding measure allocated to ensure transparency and integrity of lobbying practices is insufficient.

- publication of detailed information on lobbying activities
- approval procedures for gifts, travel or other privilege by an independent department
- a dedicated confidential hotline or email address
- internal monitoring for lobbying budget
- internal audits for lobbying activities
- independent party for monitoring lobbying budget/external audit
- external investigations of allegations
- disclosure of the company's lobbying position as regards key sector issues

Coverage of the measures allocated

Information regarding the percentage of the company covered by such controls and

measures is insufficient.

Reporting

The company does not disclose the budget directly and indirectly dedicated to lobbying practices.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Leadership	0
Visibility	0
Relevance	0
Ownership	0

Implementation	0
Means & resources	0
Coverage	0

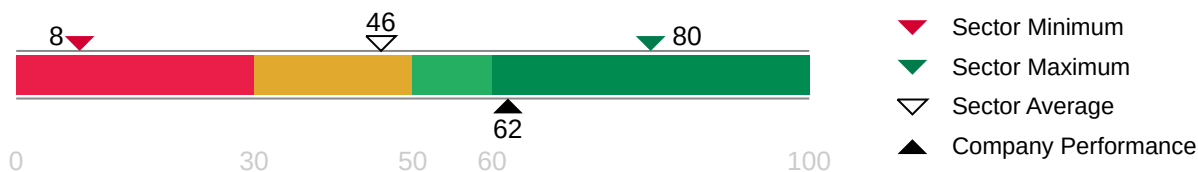
Results	35
Performance	35

Corporate governance

Score: 51

CGV1.1 Board of Directors

(score: 62, weight: 3)



[LISTED COMPANIES] Existence and independence of Nomination Committee

No specific committee is in charge of director nomination, which might raise concerns.

Independence of the Board Chairman

The roles of Chairman and CEO are separated, but the chairman is not considered independent.

Responsibility allocated over CSR issues

There is a CSR committee that is part of the Board. In addition the Head of CSR department makes regular reports to the committee.

The company reports on having an Environmental & Social Risk Committee, who works directly with the Environment & Social Management. The coordinator of the E&S management unit makes quarterly reports on the portfolio E&S categorisation to the committee.

Share of independent shareholder-elected Board members

[LISTED COMPANIES] In accordance with standards advocated by Vigeo Eiris, the Board is more than 50% independent.

Four members of the seven-member Board are considered independent.

Diversity of the skills and backgrounds of the Board

The Board of Directors diversity appears to be partial:

- At least 30% of directors are women
- At least 40% of directors are women
- Employee representative(s) sitting on the Board
- Board members with demonstrated professional experience in the company's sector of activities
- Board members with demonstrated expertise on CSR issues

- Board members with demonstrated professional experience in the company's sector of activities: The company reports that all Board members have demonstrated experience in the finance sector.

Training and expertise provided to board members

Information obtained from company and public sources regarding training provided to board members is insufficient.

Regular election of Board members

[LISTED COMPANIES] Board members are elected every year.

Board members are eligible for re-election following one-year terms.

Evaluation of Board's functioning and performance

Information obtained from company and public sources regarding the evaluation of board functioning and performance is insufficient.

Review of CSR issues at Board meeting

Some of the relevant CSR issues are discussed at Board level.

- Business ethics
- Human capital
- Responsible customers relations
- Cybersecurity
- Climate change
- Social and environmental issues in business activities
- Tax policy
- Financial inclusion

- *Human Capital: The company reports that the Board has discussed its Human Resources related policies during general meetings over the past two years.*
 - *Cybersecurity: The company reports that the Board has discussed and approved its Information Security Policy during general meetings over the past two years.*
 - *Social and environmental issues in business activities: The company's Board of Directors has reportedly discussed the implementation of its Environmental & Social Investment Handbook over the course of the last two years' general meetings.*

Regularity of and attendance at Board meetings

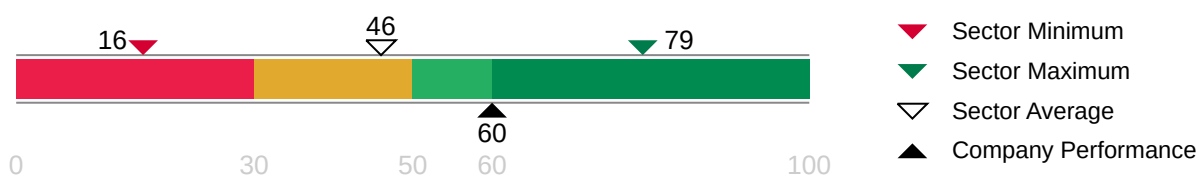
Regular meetings are held, and attendance rates are above 90%

4 Board meetings were held during the last fiscal year and the attendance rate was 90%.

Name of Board member	Role	Executive	Non executive	Employee representative	Nomination	Audit	Remuneration	Former executive	> 9 years on Board	Stock options	Paid>1/2 executive salary	Represent>3% company's shares	Other	Independency
José Romo Romero	Chairman		X			X	X		X			X		
José Romo de la Peña			X						X			X		
Jessica Espinoza T.			X			X						X		
Karen Lavonne M.			X											X
Octavio Rubio Limón	Audit Committee Chair		X			X	X							X
Juan Petersen Farah			X											X
Eduardo Michelsen D.	Compensation Committee Chair		X				X							X

CGV2.1 Audit & Internal Controls

(score: 60, weight: 3)



[LISTED COMPANIES] Existence and independence of Audit Committee

No executive is a member of the committee, but half or fewer are independent.
One member of the three-member Audit Committee is considered independent.

Skills and backgrounds of Audit Committee members

Members appear to have financial and/or audit experience and relevant operational experience.

Operational and CSR risks covered by the company's internal controls system

The internal control system covers the standard issues related to financial, operational, and legal risks. In addition, the system covers most of the CSR risks inherent to the company's business operations.

- Business ethics: non-compliance, tax avoidance, corruption
- Consumer privacy & data security
- Environmental & climate change risks in credit decisions & other banking activities
- Social & human right risks in credit decisions & other banking activities
- Inclusion, retention & development of staff
- Tax avoidance/evasion

- *Business ethics: non-compliance, tax avoidance, corruption: The company reports that its operations are subject to risks related to financing activities that are not compliant with standards related to corruption and/or tax avoidance.*
 - *Consumer privacy & data security: The company reports that its lending activities are exposed to emerging risks related to cybersecurity and security of its clients' private information.*
 - *Environmental & climate change risks in credit decisions & other banking activities: The company reports on having a risk assessment system to integrate environmental related risks in its lending and credit decisions.*
 - *Social & human right risks in credit decisions & other banking activities: The company reports on having a risk assessment system to integrate environmental related risks in its lending and credit decisions.*
 - *Tax avoidance/evasion: The company reports that its operations are subject to risks related to financing activities that are not compliant with standards related to tax avoidance/evasion.*

Governance of risks

Information disclosed on this subject is insufficient or not relevant.

- No executive is part of the Board Risk Committee
- The Board Risk Committee is composed by a majority of independent members
- The Chairman of the Audit Committee is a member of the Risk Committee
- The Chief Risk Officer (CRO) is at par level of Chief Financial Officer (CFO)
- The CRO has direct access to the Board Risk Committee (including attending committee meetings)

Of note, the company reports on having a Board Risk Committee, but the majority

of its members are considered non-independent by the company.

Role of the Audit Committee in overseeing internal and external controls

The Audit Committee has a comprehensive role that includes:

- Oversee internal audit and internal controls
- Review accounting policies and be responsible for updates
- Nominate the statutory auditor
- Oversee the work of the external auditor
- Approve the type of audit and non-audit services provided and fees paid to the external auditor

Management of the CSR risks

Limited processes dedicated to management of CSR risks appear to be in place:

- Balanced scorecard
- Risk-related training
- Monitoring of key risk indicators
- Reporting system to the Board
- Risk mapping/materiality assessment
- A board committee (with no executive part of it) overseeing CSR risks

- Risk-related training: The company's environmental and social assessment of its lending activities includes training on these issues for the commercial teams involved.

- Risk mapping/materiality assessment: The company reports on having a risk assessment system to integrate environmental and social related risks in its lending and credit decisions.

Leverage ratio of the bank

The leverage ratio of the bank is above 7%.

At December 2020, the unweighted leverage ratio of the bank ((Equity - goodwill and less tangible assets)/ Total assets) was 10.74%.

Independence of the firm's external auditors

The audit firm receives non-audit fees, but these represent only 5% or less of total fees.

Non-audit fees represented 3.9% of total fees paid to Deloitte in the last fiscal year.

Inclusion of CSR issues in the company's reporting

The company does not publish any significant CSR reporting on the key material issues for its sector.

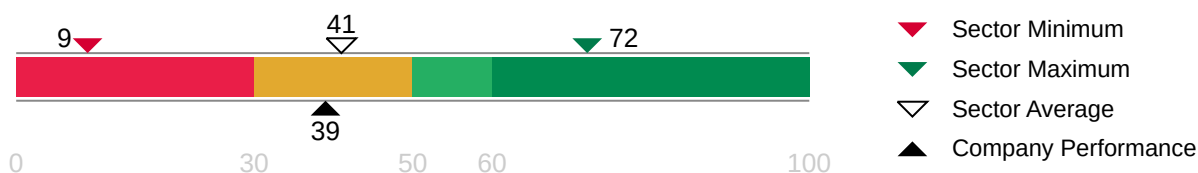
Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

CGV3.1 Shareholders

(score: 39, weight: 2)



Nonexistence of voting rights restrictions

The company respects the "one share - one vote" principle.

Safeguards on transactions with major shareholder(s)

No safeguards appear to be in place, which might raise concerns with regard to the fairness of any such transaction.

Of note, the company reports that any call for fixed capital increase or decrease is required to be approved in an EGM, while any increase or decrease of variable capital is required to be approved in the AGM. Additionally, the company reports on having a Shareholders Agreement that regulates their relations, but this document does not appear to be disclosed.

Ability to add items to the agenda of the AGM and to convene an EGM

Major restrictions have been identified to add items to the agenda of the AGM and to convene an EGM.

The company reports that a shareholder or a group of shareholders representing 20% or more of the capital stock may convene EGMs and propose modifications to the agenda.

Access to voting at General Meetings

There are no major restrictions on shareholders' ability to vote, however there is no possibility of voting through online services.

Ability to vote on relevant issues in separate resolutions at AGM

Not all major items are put to a shareholder vote.

The following items are not put to a vote at the AGM:
 - Executive remuneration
 - Selection of external auditors

Presentation of CSR strategy to shareholders and investors

The company has presented to shareholders and investors its CSR strategy and this covers some of the most relevant CSR issues.

- Business ethics
- Human capital
- Responsible customer relations
- Cybersecurity
- Climate change
- Social and environmental issues in business activities
- Tax policy
- Financial inclusion

Board's attitude towards CSR-related shareholder resolutions

Information obtained from company and public sources, regarding the Board's attitude toward legitimate CSR related shareholder resolutions is insufficient.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

CGV4.1 Executive Remuneration

(score: 33, weight: 2)



[LISTED COMPANIES] Existence and independence of Remuneration Committee

All members are non-executive directors, and the majority, including the committee's chair, are independent.

Two members of the three-member Remuneration Committee are considered independent.

Disclosure of senior executives' individual remuneration

[LISTED COMPANIES] All elements of executive remuneration are disclosed on an individual basis. However, the fair value estimate of individual grants under the long term incentive plans is not disclosed.

Link between Short Term Incentive Plans and the performance of the company

Bonuses are not linked to predetermined economic and/or operational performance indicators.

Link between the main Long Term Incentive Plan and the performance of the company

The company does not have any incentives plan for its executives linked to multi-year performance conditions.

Link between variable remuneration and CSR performance of the company

CSR performance objectives are not considered in the determination of variable remuneration of senior executives.

- Business ethics
- Customer relations
- Contribution to social development & financial inclusion
- Indirect environmental and human right impacts
- Human resources development

Severance pay for senior executives

Information obtained from company and public sources regarding severance pay for senior executives is insufficient.

Risk alignment of remuneration of material risk takers

Information on risk adjustments of remuneration is insufficient or not relevant.

Evolution of CEO-to-employee compensation ratio

The ratio of CEO compensation vs. average employee salary has been stable, or has decreased.

- The ratio of CEO compensation vs. average employee salary has decreased over the past three years by 26% from 111.8 in 2018 to 82.6 in 2020.
- The total CEO compensation has decreased over the past three years by 3%, from EUR 131,645 in 2018 to EUR 128,511 in 2020.

- The average employee compensation has increased over the past three years by 32%, from EUR 1,177 in 2017 to EUR 1,556 in 2019.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 01/2021, GF Mega did not appear to be involved in any controversy related to this sustainability driver.

Detailed Scores and Ratings

CURRENT AND PREVIOUS RATINGS

Period	Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance
2021/01	=	-	=	+	=	+

SCORES PER DOMAIN

Domain	Average Score	Leadership	Implementation	Results
Environment	35	32	29	36
Human resources	20	23	11	26
Human rights	38	31	39	45
Community involvement	47	62	41	39
Business behaviour (C&S)	39	44	22	50
Corporate governance	51	53	42	57

SCORES PER CRITERIA

Sub-domain	Criterion	Score
Environment 1	1	34
	3	68
Environment 2	2	14
	7	0

Sub-domain	Criterion	Score
Human resources 1	1	14
	3	12
Human resources 2	4	17
	2	34

Sub-domain	Criterion	Score
Human rights 1	1	N/A
	1	22
Human rights 2	4	49

Sub-domain	Criterion	Score
Community involvement 1	1	47
	1	47

Sub-domain	Criterion	Score
Business behaviour (C&S) 1	2	51
	3	41
Business behaviour (C&S) 3	1	43
	3	12

Sub-domain	Criterion	Score
Corporate governance 1	1	62
	1	60
Corporate governance 3	1	39
Corporate governance 4	1	33

Overview of the latest updates

Date of the latest update	Information updated
---------------------------	---------------------

Disclaimer

© 2020 VIGEO SAS AND/OR ITS LICENSORS AND SUBSIDIARIES (COLLECTIVELY, “V.E”). ALL RIGHTS RESERVED.

V.E provides its customers with data, information, research, analyses, reports, quantitative model-based scores, assessments and/or other opinions (collectively, “Research”) with respect to the environmental, social and/or governance (“ESG”) attributes and/or performance of individual issuers or with respect to sectors, activities, regions, stakeholders, states or specific themes.

V.E'S RESEARCH DOES NOT ADDRESS NON-ESG FACTORS AND/OR RISKS, INCLUDING BUT NOT LIMITED TO: CREDIT RISK, LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. V.E'S RESEARCH DOES NOT CONSTITUTE STATEMENTS OF CURRENT OR HISTORICAL FACT. V.E'S RESEARCH: (i) DOES NOT CONSTITUTE OR PROVIDE CREDIT RATINGS OR INVESTMENT OR FINANCIAL ADVICE; (ii) IS NOT AND DOES NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES; AND (iii) DOES NOT COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. V.E ISSUES ITS RESEARCH WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

V.E'S RESEARCH IS NOT INTENDED FOR USE BY RETAIL INVESTORS AND IT WOULD BE RECKLESS AND INAPPROPRIATE FOR RETAIL INVESTORS TO USE V.E'S RESEARCH WHEN MAKING AN INVESTMENT DECISION. IF IN DOUBT YOU SHOULD CONTACT YOUR FINANCIAL OR OTHER PROFESSIONAL ADVISER. V.E'S RESEARCH IS NOT INTENDED FOR USE BY ANY PERSON AS A BENCHMARK AS THAT TERM IS DEFINED FOR REGULATORY PURPOSES AND MUST NOT BE USED IN ANY WAY THAT COULD RESULT IN THEM BEING CONSIDERED A BENCHMARK.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT V.E'S PRIOR WRITTEN CONSENT.

ALL INFORMATION CONTAINED HEREIN IS OBTAINED BY V.E FROM SOURCES BELIEVED BY IT TO BE ACCURATE AND RELIABLE. BECAUSE OF THE POSSIBILITY OF HUMAN OR MECHANICAL ERROR AS WELL AS OTHER FACTORS, HOWEVER, ALL INFORMATION CONTAINED HEREIN IS PROVIDED “AS IS” WITHOUT WARRANTY, EXPRESS OR IMPLIED, OF ANY KIND, INCLUDING AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE. V.E IS NOT AN AUDITOR AND CANNOT IN EVERY INSTANCE INDEPENDENTLY VERIFY OR VALIDATE INFORMATION IT RECEIVES.

To the extent permitted by law, V.E and its directors, officers, employees, agents, representatives, licensors and suppliers (together, “V.E Parties”) disclaim liability to any person or entity for any (a) indirect, special, consequential, or incidental losses or damages, and (b) direct or compensatory losses or damages caused to any person or entity, including but not limited to by any negligence (but excluding fraud, willful misconduct or any other type of liability that, for the avoidance of doubt, by law cannot be excluded); on the part of, or any contingency within or beyond the control of any V.E Party, arising from or in connection with the information contained herein or the use of or inability to use any such information.

Additional terms For PRC only: Any Second Party Opinion or other opinion issued by V.E: (1) does not constitute a PRC Green Bond Assessment as defined under any relevant PRC laws or regulations; (2) cannot be included in any registration statement, offering circular, prospectus or any other documents submitted to the PRC regulatory authorities or otherwise used to satisfy any PRC regulatory disclosure requirement; and (3) cannot be used within the PRC for any regulatory purpose or for any other purpose which is not permitted under relevant PRC laws or regulations. For the purposes of this disclaimer, “PRC” refers to the mainland of the People's Republic of China, excluding Hong Kong, Macau and Taiwan.