

ENVIRONMENTAL
MANAGEMENT MANUAL

ISO 14.001:2015











Foreign Exchange Control		
Rev.	Date	Reason
13	October 2024	NX specific points are added (comments on DRIVE, SCAN, etc.), NX policy. Integrated documents are updated at GG level.

# **ENVIRONMENTAL MANAGEMENT MANUAL**

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#### 1. COMPANY PROFILE

#### History

Created in 1999 and organized under the laws of the Argentine Republic, GRUPO GALICIA's objective is to provide savings, credit and investment opportunities to individuals and companies with a high commitment from its Board of Directors.

GRUPO GALICIA is composed of the following companies: Banco Galicia, Naranja X, Galicia Seguros, Inviu, Nera, Fondos Fima, Galicia Ventures.

These companies are listed under the following corporate names: Banco de Galicia y Buenos Aires S.A.U., Tarjetas Regionales S.A., Tarjeta Naranja S.A.U., Naranja Digital Compañía Financiera S.A.U., Sudamérica Holding S.A., Agri Tech Investments Argentina S.A.U., Galicia Asset Management S.A.U., IGAM LLC, Galicia Securities S.A.U., INVIU S.A.U., Galicia Seguros S.A.U. and Sudamericana Seguros Galicia S.A.

GRUPO GALICIA is one of the major local financial services holding companies.

# **BANCO GALICIA:**

Founded in 1905, Banco Galicia is one of the largest private-sector domestically-owned banks in the Argentine financial system. Through its traditional and alternative distribution channels, it markets a broad spectrum of financial products and services for individuals and companies. The bank promotes sustainable management that is grounded on the belief that business can only grow successfully if operations are conducted based on their social and environmental impact. This responsibility is supported by principles and purposes that guide the conduct of the bank's employees and is reflected and materialized in our policies, practices and programs.

## **NARANJA X:**

Naranja X is GRUPO GALICIA's fintech that helps customers to enhance the use of money. Naranja X creates technological solutions for the personal and corporate finance of millions of Argentine people. Naranja X's biggest challenge is to be close to customers and provide them with simple tools that help them grow, improve their quality of life, and access a world of possibilities.

## **GALICIA SEGUROS:**

Galicia Seguros started conducting its business activities in 1996 as a member of GRUPO FINANCIERO GALICIA. It offers insurance for individuals and their property, for retail and wholesale stores, and companies. In the areas of home, theft and personal accidents, it occupies the top positions within the insurance industry. In this way, it is present in people's lives, supporting all their needs. In 2016, the company restated its strategy and redefined its corporate purpose and values within the framework of the organizational culture and change project. Its purpose is to take care of people's affections and achievements.

#### **INVIU:**

Inviu is a financial innovation company launched in 2020 that is promoting a new investment culture. This platform is customized for each client's profile, thus generating close and trusting ties between advisers and investors. It is a digital experience that changes the way people invest and allocate their financial resources.

#### **NERA:**

Nera is a digital ecosystem which makes agro-financial management simple, practical and integrated. It has payment and financing functionalities to help in the management of the business, being part of an efficient, sustainable and leading connection in the global agribusiness scenario.

#### **GALICIA SECURITIES:**

Galicia Securities offers non-banking financial and stock market services to individuals, companies and institutions. It provides innovative solutions, focused on building close and long-term relationships, seeking continuous improvement in customer experience.

#### **GALICIA VENTURES:**

It is a Settlement and Compensation Agent (Agente de Liquidación y Compensación, ALYC). It offers unbanked financial products and services to its customers with an integrated value proposition.

## **FONDOS FIMA:**

With over 60 years of experience, since 1958, Galicia Administradora de Fondos has been managing FIMA mutual funds, distributed by Banco Galicia through its multiple channels (branch office network, Galicia Online Banking, and Office Banking, among others) and other agents. The company has a team of assets management professionals who manage the FIMA's family of funds, designed to satisfy the requirements of individual, business, and institutional investors seeking to diversify their investments by choosing portfolios with different risk profiles.

#### **GRUPO GALICIA**

## Leadership

We are one of the major financial services holding companies in Argentina. Through our subsidiaries, we provide savings, credit, investment, insurance, advice and digital solutions to individuals and companies, prioritizing customer experience, sustainable development and digital transformation.

Our purpose at Grupo Galicia is to "improve the daily activities of more individuals."

TO IMPROVE: it is to seek that each interaction and design is an opportunity to change a reality; to think about it differently.

THE DAILY ACTIVITIES: it is here and now, it is every day a little more, it is in each moment and in each contact, but with a long-term perspective.

OF MORE INDIVIDUALS: we have a vision of sustainable growth and leadership that includes all our stakeholders: customers, community, shareholders and employees.

The Board of Directors of each of the companies is part of GRUPO GALICIA, and they assume their responsibility of leadership of the GROUP to uphold the principles set forth in its policies.

Its strategic vision is based on the Sustainability-ESG (Environmental, Social and Governance) approach, and is shared with all areas of the business through the establishment of policies, indicators and integral goals at Group level.

GRUPO GALICIA works collaboratively with internal and external partners through the definition of an inspiring and transformational strategy that allows us to identify priorities which have a positive impact on employees, customers, society and the environment in the medium and long term.

GRUPO GALICIA works on 4 environmental programs:

AWARENESS: It seeks to work on communications and training both internally and externally to raise awareness among GRUPO GALICIA's employees and the community in general, with a focus on sustainability and climate change, among others.

RATIONAL USE: It seeks to work on the rational use of GRUPO GALICIA's consumption of electricity, natural gas, water, diesel and refrigerant gases.

OPTIMIZATION: Its objective is to work on the reduction of waste, paper and office supplies, among others, of GRUPO GALICIA.

INDIRECT RISKS: Its objective is to minimize Banco Galicia's indirect risks.

Furthermore, the participation of all GRUPO GALICIA's referents in the Environmental Management System is ensured, deploying its planning and control both in the operative management and in the Cross Teams meetings for the analysis of information and the taking of operative and strategic decisions at Group level.

The Cross Teams were approved in April 2024 and are divided into the following groups:

**CROSS TEAM FOR ENVIRONMENTAL STRATEGY:** Its objective is to take a lead role in all aspects of sustainability and leadership.

**CROSS TEAM FOR RATIONAL USE OF ENERGY, WATER, GAS AND FUEL:** The objective of this group is to lead definitions on issues relating to the rational use program.

**CROSS TEAM FOR OPTIMIZATION OF PAPER, CARDBOARD AND SPECIAL WASTE RESOURCES:** The objective of this group is to lead definitions on issues relating to the optimization program.

**CROSS TEAM FOR ENVIRONMENTAL AWARENESS:** Its objective is to lead communication and training actions with a group approach.

**CROSS TEAM FOR LEGAL ISSUES:** The objective of this team is to lead everything related to environmental legal requirements applicable to GRUPO GALICIA.

## 2. GRUPO GALICIA'S CONTEXT

#### 2.1 ANALYSIS OF THE INTERNAL AND EXTERNAL CONTEXT

The context of GRUPO GALICIA is identified through the SWOT + PEST tool, which includes an external and internal analysis taking into account political, economic, social and technological issues, both of the particularities of each of the companies of GRUPO GALICIA as well as general issues of the GROUP.

This analysis is detailed in a single SWOT that is shared in Galicia's Sharepoint, in folder 2. Context.

## 2.2 STAKEHOLDERS

Stakeholders relevant to the EMS are identified through GRUPO GALICIA's "Stakeholders Matrix" register.

The stakeholders of each company and of GRUPO GALICIA are analyzed in each of its buildings.

Additionally, every year, as part of the review by the directors, changes in stakeholders, their needs and expectations, internal and external issues, as well as the risks associated with the activity, are analyzed. Finally, feedback from these stakeholders is reviewed to ensure that their needs and expectations are met throughout the EMS process.

## 3. GRUPO GALICIA'S ENVIRONMENTAL COMMITMENT

We understand the environment as the natural setting that surrounds human beings, with which they are in permanent interaction.

The quality of life and the eventual survival of life on Earth is intrinsically linked to the health of the environment, which we consider to be a heritage that we must protect for the benefit of all people, by avoiding, minimizing or controlling the negative impacts that our activities may have on it.

As a financial entity, we not only take care of the environment through the prevention and minimization of the direct impact of our activities, but we also seek to carry out responsible environmental management in the development of our entire business.

This commitment is also reflected through the voluntary adoption of the Equator Principles, the guidelines of the *IFC* and the *UNEP Fi* program, the *Carbon Disclosure Project* (Banco Galicia), the guidelines of the United Nations Global Compact, the *Global Reporting Initiative* and the GHG Protocol for measuring the Corporate Carbon Footprint (GRUPO GALICIA).

Assuming our environmental responsibility implies the following:

- From the legal point of view: to strictly apply the applicable legal requirements and other requirements endorsed by GRUPO GALICIA in relation to our environmental aspects.
- From the technological point of view: by upgrading infrastructure and equipment, to contemplate and minimize the environmental impact of our operations
- From the management point of view: to implement policies, mechanisms and controls that translate into concrete environmental improvements.
- From the human point of view: to promote environmentally responsible behavior among our employees, raising their awareness and turning them into multiplying agents of such behavior.

## 4. GRUPO GALICIA'S POLICIES

Grupo Galicia's policies are communicated internally, and it is the commitment of the companies within GRUPO GALICIA to disseminate them. They are available to stakeholders. They are reviewed by the directors at each Review by the Directors to ensure their relevance and/or updating.

## **CARING FOR CLIMATE POLICY**

This document defines the environmental focus within Grupo Galicia's ESG strategy, applicable to all its subsidiaries, to move towards carbon neutrality, seeking to generate shared value for all areas of the business through the establishment of comprehensive indicators and goals at Group level.

Summary:



# SUSTAINABILITY-ESG POLICY OF GRUPO GALICIA

The Sustainability-ESG Policy of Grupo Galicia has been established and documented within the framework of the extension process of sustainable management to the entire Grupo Galicia.

This Policy is disseminated and communicated to all employees of Grupo Galicia.

Summary:

#### 2.1. Objective

This document establishes the approach to Sustainability-ESG of Grupo Financiero Galicia S.A. based on a common strategic vision through purposes that define the identity of each subsidiary company, seeking to generate shared value to all business areas through the establishment of comprehensive indicators and goals at Group level.

This Policy defines and establishes the management framework and **General Principles** to be followed by the Group and its subsidiaries in terms of sustainable development.

Grupo Galicia's commitment to sustainable development is evidenced in an integrated triple performance management with ESG objectives (environmental, social and governance factors), managed through indicators used to evaluate the impact of the Group's subsidiary companies and complement traditional financial objectives. These include the following issues:

- Environmental goals: management of Critical Resources, contribution to climate change through the management of the carbon footprint, analysis of associated risks, and financing of the environmental impact;
- Social goals: employees' development, health and safety, diversity and inclusion strategy, local development, sustainable financing, digital transformation, customer experience and cybersecurity;
- Corporate governance goals: management leadership, ethics, transparency and anticorruption, comprehensive risk management, and economic performance.

This policy must be observed by all companies of the Group, as well as their executives and employees, regardless of the type of contract.

#### 3. GENERAL PRINCIPLES

The Group will follow these general performance principles in ESG matters:

- 1. To promote a profitable and sustainable business model with a long-term perspective.
- 2. To integrate sustainability transversally to all business areas, creating value for our stakeholders.
- 3. To incorporate ESG opportunities and risks into strategy, processes and comprehensive risk management.
- 4. To contribute to the transition to sustainable business models for customers.
- 5. To design innovative and sustainable products and services with a focus on the productive ecosystem and a low-carbon economy.
- To promote an inclusive management of diversity, ensuring equal opportunities and a culture of respect for differences.
- To develop agile, efficient, collaborative and innovative teams in safe and healthy environments that generate value for customers.
- 8. Contribute to the well-being of individuals and the development of local communities.
- 9. To promote financial inclusion and education.
- 10. To manage our environmental impact through the mitigation and compensation of carbon emissions in the development of our operational and business activities, with a focus on carbon neutrality.

## 5. SCOPE

This Environmental Management Manual, and the policies and guidelines emanating from it, apply to environmental management, based on the requirements of the International Standard ISO 14001:2015.

The scope is determined as follows:

- BANCO GALICIA: Administrative management and financial assessment activities carried out in corporate buildings and branch offices:
  - TORRE, located at Tte. Gral. Juan Domingo Perón 430, Autonomous City of Buenos Aires.
  - PLAZA GALICIA, located at Leiva 470, Autonomous City of Buenos Aires.
  - HEADQUARTERS, located at Tte. Gral. Juan Domingo Perón 407, Autonomous City of Buenos Aires.
  - BRANCH OFFICES
  - OTHER REAL PROPERTY AND PREMISES

## - NARANJA X:

- Development of products, services and functionalities to manage personal and commercial finances at Leiva 4070, Autonomous City of Buenos Aires.
- Administrative and operational management activities carried out in the Casa Naranja X building, located at La Tablada 451, Córdoba City, Argentina.
- Printing, enveloping and mailing of plastic cards for customers, located at Sucre 541,
   Córdoba City, Argentina.
- BRANCH OFFICES
- GALICIA SEGUROS: Insurance offer for individuals and their property, for retail and wholesale stores, and companies at Tte. Gral. Juan Domingo Perón 430, Autonomous City of Buenos Aires.
- INVIU: Financial innovation services at Leiva 4070, Autonomous City of Buenos Aires.
- NERA: Digital platform for financial management of agriculture at Leiva 4070, Autonomous City of Buenos Aires.

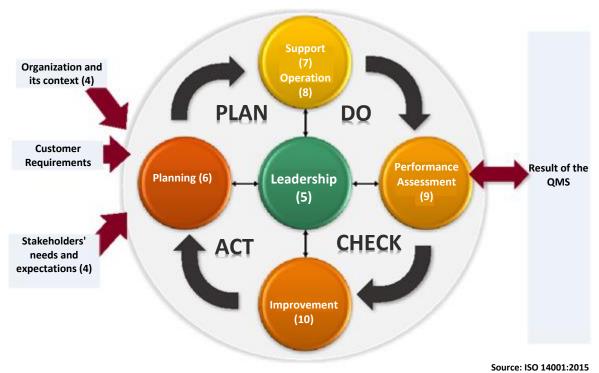
## 6. TERMS AND DEFINITIONS

For the purposes of this Environmental Management Manual and the Environmental Management System set forth therein, the terms described in standard **ISO 14001:2015** are adopted.

## 7. THE ENVIRONMENTAL MANAGEMENT SYSTEM

GRUPO GALICIA has established, documented, and implemented an Environmental Management System, which it maintains, based on the requirements of standard ISO 14001: 2015.

The Environmental Management System and the evolution of the objectives and plans defined at both the operational and strategic levels are monitored.



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# 7.1 RESOURCES, FUNCTIONS, RESPONSIBILITY AND AUTHORITY

The Board of Directors ensures through its annual planning and budgeting the availability of essential resources to establish, implement, maintain and improve the Environmental Management System.

Competencies are established according to the needs of the system and then the responsible persons are assigned accordingly.

Roles, responsibility and authority are adequately documented and communicated to facilitate an effective environmental management.

#### Reference documents:

- GFG Responsible Individuals Matrix
- EMS Roles and Responsibilities

#### 7.2 PLANNING

# 7.2.1 Actions to Address Risks and Opportunities: Comprehensive Environmental Risk Management

Once the SWOT has been generated, GRUPO GALICIA works on the risks to be minimized and/or the opportunities to be enhanced. They are managed through actions in an action plan within the same registry.

Through its Board of Directors, Banco Galicia manages business risk in an integral manner and develops ethical processes that allow us to comply with the established regulations, have updated policies in place, and guarantee the security and transparency of our operations. Comprehensive risk management is essential to business strategy and to the creation of value of their shareholders.

The Risk Management Area permanently monitors the operations of the main risks that may affect the fulfillment of Banco Galicia's strategy, ensuring compliance with the regulations in force and internal policies, and also making sure that the Board of Directors is always informed about the level of exposure. It also proposes policies and procedures that allow it to maintain an adequate profile with the risk appetite defined by shareholders, and aligns itself with international best practices in order to continuously improve its processes.

In order to manage the area efficiently, it is in charge of teams specialized in each risk dimension:

**Financial risk:** it is related to liquidity and solvency levels.

**Credit risk:** it is the possibility of total or partial economic loss due to the financial obligations undertaken with the Bank or its related companies by its customers or counterparties.

**Operational risk:** losses resulting from the failure or inadequacies of internal processes, human resources or IT systems, or stemming from external events. Market risk or "price risk": it is the possibility of incurring losses arising from the market price variation in listed financial assets subject to trading. Interest rate risk: it is the result of the financial margin

and the Shareholders' Equity economic value variation as a consequence of the fluctuation of market interest rates.

**Reputational and strategic risk:** situations that generate loss or decrease of trust and perception of quality among target audiences. Environmental and social risk: the possibility of having a negative impact on aspects related to the preservation of natural spaces, community development and human rights.

**Environmental, social and climate risk:** this refers to the management of indirect risks in credit, where the potential environmental and social risks that may be caused by the investment projects being financed and the credit assistance are analyzed. Galicia voluntarily adheres to the Equator Principles and applies this framework for Project Finance over USD 10 million and corporate loans over USD 50 million.

Additionally, we complement the environmental analysis with climate risk, detecting the main physical and transitional risks, as well as adaptation and mitigation opportunities, and measuring the carbon footprint of the portfolios.

# 7.2.2 Environmental Aspects

GRUPO GALICIA has established and maintains a documented procedure to identify the environmental aspects of its activities that have or may have a significant environmental impact.

Environmental aspects are identified and analyzed in the Environmental Aspects and Impacts Matrix, which is prepared for each building and updated according to the established procedure.

The environmental aspects determined as significant are fundamental elements for the establishment, implementation and maintenance of the Environmental Management System.

There are situations, such as temporary works, that require a specific analysis of the environmental aspects, in which case a register is used for this purpose.

# Reference documents and records:

- Procedure for the Identification and Assessment of Environmental Aspects
- GFG Environmental Aspects and Impacts Matrix

# 7.2.3 Legal and Other Requirements

GRUPO GALICIA has established and maintains documented procedures to identify, access and determine how to apply the environmental legal requirements applicable to each of the companies of GRUPO GALICIA and other requirements to which GRUPO GALICIA adheres.

It is the responsibility of all employees and contractors who work in the buildings to comply with them.

Those particular legal requirements are managed by each company of GRUPO GALICIA, and documented information on their identification and the compliance assessment is kept and maintained.

## Reference documents:

- Legal and Other Requirements Identification and Compliance Assessment
- RRLL GCM UP Monitoring Platform (BG)
- Environmental Scanning Platform (Naranja X)
- INVIU-NERA Legal Environmental Requirements Matrix
- Legal Requirements Monitoring Form GS Compliance

# 7.2.4 Objectives, Goals and Programs

GRUPO GALICIA establishes and documents environmental objectives and goals to be achieved in a given period.

These objectives and goals are consistent with the environmental principles of GRUPO GALICIA, with its policies, with the applicable legal requirements and with the requirements to which GRUPO GALICIA adheres.

In order to meet the objectives and goals set, indicators and programs are established detailing functions, resources and deadlines for achieving them.

Likewise, these programs constitute a framework for measuring the Carbon Footprint, which involves:

A1: Fixed combustion, mobile combustion, other emissions.

A2: Electricity.

A3: Raw materials used, waste, in itinere travel, corporate travel, logistics.

## Reference documents:

- Objectives, Goals and Programs (of the current year)
- Climate Change Dashboard (of the current year)
- NX Footprint Dashboard (of the current year)

# 7.2.5 Planning of changes:

Changes to the EMS are made on a planned basis and may have the following origins:

- Review by the Directors,
- External or internal EMS audits.
- Customer complaints and claims,
- Results of services,
- Detection of failures or opportunities for improvement during the development of the processes,
- Changes in current regulations,
- Information derived from the usual market analysis and context,
- Changes proposed by stakeholders,
- New projects.

## Reference documents:

Change Management Registration

## 7.3 IMPLEMENTATION AND OPERATION

# 7.3.1 Competence, Training and Awareness-Raising

The companies comprising GRUPO GALICIA ensure that all employees who perform tasks that may have significant impact have adequate competence based on their education, training or experience.

GRUPO GALICIA's companies ensure that all employees know and are aware of the policies, the objectives assigned to their function, the importance and impact of their daily tasks on the effectiveness of service delivery and compliance with the requirements of customers and stakeholders.

Awareness-raising activities are carried out among the personnel regarding the principles and policies of GRUPO GALICIA, how the work of each of them impacts on it and the potential risks of significant impacts.

Training and awareness-raising activities are planned both at GRUPO GALICIA level and specific to each company.

## Reference documents:

- Training Procedure
- GFG Training Plan (of the current year)

#### 7.3.2 External and Internal Communication

GRUPO GALICIA maintains adequate internal communication with all its personnel through screens in the buildings, communications in Workplace or Slack (as appropriate) and internal emails, among others.

An annual communication plan is drawn up at GRUPO GALICIA level based on a suggested theme, and then each company adapts the corresponding communication and disseminates it through its internal media.

The Communication Plan is followed-up monthly together with the Cross Team for Environmental Awareness.

External communication is carried out through the company's website, social networks, newsletters to customers, press releases and advertising, among others.

## Reference documents:

- Internal and External Communication Procedure
- GFG Communication Plan (of the current year)

## 7.3.3 Documented Information

GRUPO GALICIA controls the documentation and records of the Environmental Management System.

Before their issuance, the Environmental Management System documents are approved by individuals with specific roles.

When necessary, documents are reviewed and updated. When updating a document, the changes and revision status are identified.

GRUPO GALICIA establishes and maintains the necessary documents to prove its compliance with the requirements of the established Environmental Management System.

Records are identified, stored for a certain period, protected, retrieved and disposed of in accordance with the documented procedure.

## Reference documents and records:

- Documents and Records Control Procedure
- List of Documentation and Records

## 7.3.4 Operational Control

For those operations associated with significant (actual or potential) impacts, operating instructions and controls have been established and documented to ensure that they are carried out under conditions that avoid, reduce or control the significant aspects.

Some of the operational controls, for example, deal with hazardous waste, generating sets and fuel unloading, management and review of urban solid waste and recyclable materials, WEEE, handling and storage of cleaning products and water consumption, among other relevant issues.

## Reference documents:

- See folder 4. Implementation and Operation; 5. Operational Controls

# 7.3.5 Preparedness and Emergency Response

GRUPO GALICIA has established procedures on operations to identify, prepare and respond to potential emergency situations that may have an impact on the environment.

Periodic tests of such procedures are conducted to assess their effectiveness, such as evacuation and fuel spill drills.

# Reference documents:

- See folder 4. Implementation and Operation; 6. Preparedness and Emergency Response
- DRIVE repository of NX's documentation

## 7.4 VERIFICATION

# 7.4.1 Internal Audit

GRUPO GALICIA schedules internal audits at planned intervals to determine whether the Environmental Management System:

- complies with the plan, the applicable legislation, the requirements to which GRUPO GALICIA has adhered and the ISO 14001:2015 standard.
- has been properly implemented and is being maintained.

GRUPO GALICIA manages the entire internal environmental audit process through a documented procedure that establishes the responsibilities and requirements for planning and conducting audits, reporting the results, and maintaining the associated records.

GRUPO GALICIA has a team of internal auditors, who have been trained as required to be able to develop this task and, in addition, they contribute with their experience of years of being part of the Environmental Management System.

## Reference documents:

- Internal Environmental Audit Procedure
- GFG Audit Program (of the current year)
- GFG Audit Plan
- Internal Audit Report

# 7.4.2 Review by the Directors

The Directors establish a system of annual verification of the Environmental Management System implemented, aimed at ensuring its suitability, adequacy, and continuous effectiveness.

Input items for the reviews by the Directors include:

- a) The status of actions from previous Reviews by the Directors
- b) Changes in external and internal issues that are relevant to the Environmental Management System
- c) Changes in the needs and expectations of stakeholders, including legal and other requirements
- d) Changes in significant environmental aspects
- e) Changes in risks and opportunities
- f) The extent to which environmental objectives have been achieved
- g) Information on environmental performance, including trends related to:
  - nonconformities and corrective actions
  - follow-up and measurement results
  - compliance with legal and other requirements
  - audit results
- h) Resource adequacy
- i) Relevant communications from stakeholders, including complaints
- j) Opportunities for continuous improvement

As a result of each Review by the Directors, a report is issued where the outputs of such review are analyzed, which include:

- k) Conclusions on the suitability, adequacy and continued effectiveness of the EMS
- I) Decisions related to continuous improvement opportunities
- m) Decisions related to any need for change in the EMS, including resources
- n) Actions required when environmental objectives have not been achieved
- o) Opportunities to improve the integration of the EMS with other business processes, if necessary
- p) Any implication for the strategic management of Grupo Galicia

## Reference documents:

- Review by the Directors Report (of the current year)

## 7.5 IMPROVEMENT

## 7.5.1 Noncompliance, Corrective Action and Preventive Action

Grupo Galicia has established a documented procedure to manage actual and potential noncompliance, take actions to mitigate their environmental impacts, and take appropriate corrective actions and record them properly.

Each noncompliance is investigated to analyze its cause and determine the actions to be taken to prevent their recurrence.

The effectiveness of the implemented actions is adequately assessed and recorded.

## Reference documents and records:

- Findings Management Procedure
- Inventory of Actions

## 8. ENVIRONMENTAL MANAGEMENT SYSTEM PROCESS DIAGRAM

Grupo Galicia has a Process Map, which details all the strategic, main and support processes within the scope of the EMS, and the interaction between them.

