

BdB Human Rights Policy

As part of our **corporate sustainability strategy**, we are committed to managing our business ethically, innovatively and responsibly for our stakeholders in order to generate *shared value*, improve our stakeholders' quality of life, contribute to society's economic prosperity and make a positive contribution to environmental conservation. This enables us to establish the *Sustainable Business Model*, which incorporates economic, environmental and social criteria, and adheres to national and international best practices.

Aligned with this purpose, we operate based on our sustainability strategy, policies, codes and handbooks, which have facilitated the formation of a business culture. Additionally, this policy declaration adheres to all the principles and guidelines defined by our Code of Ethics and is in accordance with our established governing principles.

This policy is the framework for action that governs us in human rights, committing us to: transparency and anti-corruption; care and respect for all people; inclusion, diversity and equality; environmental conservation and contribution to society; and data protection, communication and disclosure mechanisms for all our stakeholders.

Aim

Consolidate our commitment to the promotion, protection, respect and remedy, when applicable, of human rights, in line with the applicable national and international standards, and internal handbooks, codes and policies.

Scope

The human rights commitment established through this policy is applicable in all spheres and to our stakeholders: Board of Directors, shareholders and investors, clients, employees and third – party contracted labor, suppliers and partners, government and control agencies, media and opinion leaders, professional groups and associations, NGOs, universities, local communities (including: children, women, indigenous people, migrant workers), and all the stakeholders who interact with the Bank¹.

Benchmark standards and regulations on human rights

This policy is part of the applicable national and international regulations and the standards of respect and protection of human rights, specifically:

- Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights

¹ This policy does not cover our subsidiaries.

- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- United Nations Principles for Responsible Banking
- United Nations Global Compact
- Sustainable Development Goals (SDGs)
- Net Zero Banking Alliance (NZBA)
- Fundamental Conventions of the International Labour Organization (ILO)
- Convention on the Rights of Persons with Disabilities
- Standards of Conduct for Business on Tackling Discrimination against LGBTI People
- Colombian Constitution

Our commitments

We are committed to **respecting and promoting** all the human rights established in the aforementioned benchmark standards and to generating action plans that ensure that we meet this commitment. We are also committed to ensuring the **protection** of the mentioned stakeholders' human rights, as well as **remediating** any impact on human rights that may occur with respect to our business activities, aligned with the Guiding Principles on Business and Human Rights.

Additionally, based on the risks and impacts associated with the possible vulnerability of the human rights identified in our management and our stakeholders' perception, resulting from the inquiry made to draft this policy, we will focus our management on:

Care and respect for all people

- To guarantee an environment free from harassment, which includes sexual and non-sexual harassment, understood as sexual or non-sexual actions, comments, and behaviors, that affect the physical, emotional, or psychological well-being of individuals, as well as any physical and/or emotional violence involving our partners, clients, suppliers, and any person who has a relationship with the Bank's activities. For more information, please refer to Annex 2. Guidelines to ensure zero tolerance to sexual and non-sexual harassment and discrimination.
- Promoting equality, diversity and inclusion, as well as zero tolerance to discrimination on any grounds, including: race, color, sex, language, religion, political or other opinion, national or social origin, place of birth, economic or other status, through a confidential and serious process, capable of generating corrective measures to prevent such behaviors in all our processes, activities and in our value chain. For more information, please refer to Annex 2. Guidelines to ensure zero tolerance to sexual and non-sexual harassment and discrimination.
- Encouraging the well-being and safety of our employees, complying with the legal requirements at all times with respect to social security payments and contractual commitments, as well as complying with the Occupational Safety and Health Management System (OSHMS).

- Promoting good practices and legal obligations in our supplier relations to respect human rights, especially regarding hiring, the environment and transparency.
- Ensure freedom of association, including the right to strike and collective bargaining, which allows our employees to protect their interests.
- Rejecting human trafficking, forced labour, child labour in all its forms both in our operation and in the activities of our stakeholders, especially our suppliers.

Transparency, anti-corruption and illegality

- Fighting against corruption at all levels of our operation and throughout our value chain through compliance with our Anti-fraud and Anti-Corruption Policy.
- Ensuring due process in the resolution of any conflict that arises with employees, suppliers or any other stakeholder.
- Ensuring compliance with the organization's Code of Ethics by all our stakeholders.
- Ensuring transparency in the sales process of our products and services, providing complete information about the conditions of the products our clients acquire in order to meet our value promise.

Guarantee of inclusion, diversity and gender equality

- Ensuring that the hiring, remuneration, development and training processes and other conditions are equal and inclusive at all levels, including the selection processes for Board members.
- Promoting inclusive and fair management practices that enable visibility and diverse and equal participation at all managerial levels, including the Board of Directors.
- Offering mechanisms that minimize the barriers to access, through actions that improve access to our financial products and services.
- Promoting practices that foster a work-life balance among our employees and promoting a diverse work environment.
- Ensuring that any person with disabilities or special needs can safely access, pass through and remain on our facilities, as well as comfortably and autonomously accessing our products and services.

Environmental conservation and contribution to society

- Preventing, mitigating and/or remedying the real or potential impacts generated on the environment by our activities.
- Promoting the incorporation of social and environmental criteria into our business ecosystems.
- Preventing the possible negative impacts of projects financed by the Bank on society and the environment, by improving the evaluation mechanisms.
- Promoting initiatives that generate a positive social and economic impact on the communities where we operate.

Data protection

- Ensuring the protection and proper use of the data of our customers, suppliers and

employees through compliance with the policy on management of privileged or confidential information.

Communication and disclosure

- Ensuring that our internal and external communications respect and promote human rights, especially inclusion and anti-discrimination.
- Promoting respect for human rights through training and raising the awareness of our stakeholders.
- Communicating and disclosing the actions and results of our human rights management to our stakeholders.

Implementation mechanisms

We assume the commitment to systematically generate and implement action plans that enable us to meet the commitments established in this policy and the results of our due diligence process. Through the Ethics Committee, we will ensure the observance and implementation of this policy.

Control mechanisms

The observance and assessment of this policy are derived from the guidelines supported in the Code of Ethics, Corporate Governance Code, Internal Rules of Procedure, and Sustainability Strategy. Each department in charge of managing this framework for action shall be responsible for exercising control and assessment of the commitments generated in this policy, according to its procedures.

We are all committed to promoting and disclosing all our codes, policies and mechanisms for prevention and control that support compliance with this policy as part of ethics and transparency.

Service channels

An essential part of ensuring compliance with our commitments is the existence of mechanisms that enable our different stakeholders to communicate and report any violation or alleged violation of human rights related to our operations. We have the following service channels:

Ethics Hotline:

- Banco de Bogotá Ethics Hotline: Learn more [here](#).
- Aval Ethics Hotline: Learn more [here](#).

Workplace Harassment Committee: Banco de Bogotá employees can report cases of workplace harassment inside the organization by email or by contacting the Human Resources department.

Financial Consumer Satisfaction Committee: This committee is in charge of

comprehensively supervising customer experience to ensure satisfaction during all the defining moments of customers' relations with the Bank.

Financial consumer ombudsman: Consult the [webpage](#).

Disclosure

For the continuous improvement of our management, any feedback or comments about this policy can be sent to the email: sostenibilidad@bancodebogota.com.co.

Annex 1. Glossary

- **Workplace harassment:** Recurring actions in the workplace that instill fear, intimidation, terror or anguish in a person, causing their lack of motivation or resignation from the job.
- **Sexual harassment:** Undesired sexual conduct that can cause a person to feel offended, humiliated and/or intimidated.
- **Contractual commitments:** The agreements reached between two parties through a legal document in which they are bound to comply.
- **Corruption:** Taking advantage of a situation and/or abusing power to receive different benefits other than those established or warranted.
- **Due diligence:** Process assessing the human rights management of a company that enables the detection and resolution of the risks and impacts of its human rights management.
- **Human rights:** Rights inherent to all human beings without any distinction of any kind due to race, gender, nationality, ethnic origin, language, religion or any other condition.
- **Discrimination:** The actions and/or behaviors in any area of life that aim to destroy or defame a person, generating a distinction and/or preference based on people's physical characteristics or opinions.
- **Disability:** Physical, mental and/or intellectual impairments of people that limit their participation in equal conditions in different contexts of society.
- **Diversity:** Under the premise that we are all equal in dignity and rights, diversity recognizes that each person is different and deserves the respect of all their rights.
- **Equality and equity:** All people are born with the same dignity and rights. To achieve equity, it is necessary to ensure that each person can have the same opportunities to access the same goods and services according to their needs. An example of this is the stratification of public utility bills, which ensures that all people can afford the services, taking into account their specific socioeconomic conditions.
- **Inclusion:** Ensuring that all people, regardless of their race, color, gender, language, religion, political or other opinion, nationality or social background, financial situation, birth or any other social condition can participate in society in equal conditions.
- **Social security:** General systems established for pensions, health care, work-related risks, family subsidies, and the additional social services established by law.
- **Transparency:** Transparency is the quality of a government, company, organization or person of maintaining open communication of information, rules, plans, processes and actions.
- **Violence:** The intentional use of physical force or threats against another person, group or community that can result in trauma, psychological harm, development problems or death.

Annex 2. Guidelines to ensure zero tolerance to sexual and non-sexual harassment and discrimination.

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The organization, in compliance with Law 1010 / 2006 and Resolution 652 / 2012, has a Workplace Harassment Committee in place, which was democratically elected by the employees and the employer. This is the committee which receives complaints related to workplace, sexual or non-sexual harassment and discrimination. Any such cases are filed by employees through a confidential channel established for the reception of these cases, with the aim of taking the actions that are relevant in which the parties involved participate to promote working agreements, improve the working relationships, respect, adjust behavior in a positive manner and contribute to a healthy and inclusive work environment

Furthermore, the Bank, in compliance with labor legislation and in alignment with Internal Labor Regulations, and its Collective Agreement, has a disciplinary procedure that allows, not only for the investigation of the constitutive conduct of possible misconduct on the part of the employees, but also those that are reproached in their internal regulations such as disrespect for the company and its employees. These might revolve around abuse, harassment, discrimination, mistreatment or other type of behavior unrelated to coexistence and well-being at work. In this way, corrective measures can be applied, with a view to maintaining order, discipline, respect and preventing new discriminatory manifestations that harms the organization and its employees.

The process will consist of at least three stages:

1. Receipt and analysis of the case
2. Summons to rebuttals, with the aim of clarifying the truth of the facts and that the employee involved can exercise his right to defense and contradiction. The employee must be summoned within 20 business days of knowledge of the facts. They will be given three days to prepare their defense and on the fourth day the rebuttals will take place. Under the principle of transparency, the employee may be accompanied by two trade union representatives (if applicable).
3. Decision-making: Once the rebuttals have been completed, the Bank will have 20 business days to generate its decision, which may be: closing the process; wake-up call; suspension of employment contract; or termination of the employment contract with just cause, according to the seriousness of the facts.
4. Notification of the decision is given to the employee.
5. Challenge: Once the employee has been notified of the decision, they will have three business days to challenge it, which must be decided by the chief's immediate supervisor. The Bank has 20 calendar days to resolve the challenge.

2. Promotion and awareness-raising to consolidate an organization free of harassment and discrimination

At least two annual awareness-raising campaigns are undertaken in connection with zero tolerance to discrimination and the dissemination of confidential channels available to the organization, for the reporting of discriminatory practices, sexual abuse and other behaviors that threaten the respect, inclusion, development and well-being of employees.

As part of the onboarding process, it is mandatory to participate in two courses related to:

1. Organizational Culture seal, where the employee is identified and respected; it is inclusive and diverse and is comprised of 3 dimensions and 9 behavioral attributes.
2. Training on diversity, inclusion and non-discrimination to raise awareness and promote new talents, practices and positive behaviors and the training of leaders in this area. This takes place on a regular basis.

The organization is certified in respect of diversity, equity, inclusion and non-discrimination, which allows both for the adoption and improvement of processes and practices, as well as ratification of the Bank's commitment to society, as a leading organization in the field of inclusion, equity, free from harassment and discrimination.

3. Training and education on sexual and non-sexual harassment and non-discrimination

The Bank is committed to the continuous training and development of employees in relation to sexual and non-sexual harassment and non-discrimination, through:

- Onboarding training on diversity, inclusion, and non-discrimination to all Bank employees, with the aim of fostering a diverse, equitable, inclusive culture which respects differences.
- Training on diversity and non-discrimination to commercial staff, who are the customer-facing arm of the bank.
- Offering spaces for conversation on inclusion, discrimination, and micro-aggressions.
- Running campaigns for zero tolerance to discrimination.
- Training through specialized programs and partners. The Bank is currently ACDI/VOCA certified in conjunction with USAID as "a leading financial entity in promoting diversity and inclusion, with a commitment to gender equity."