

BdB Human Rights Report 2021

Human Rights Report

Introduction

Our Sustainability Business Model



Within the framework of our **Corporate Sustainability Strategy**, which is aligned with our corporate strategy of the 6c's, we are committed to managing our business in a responsible and innovative way, to promote the improvement of people's quality of life that relate to us, contribute to the economic prosperity of society and contribute to reduce the impact that we generate to the environment, allowing us to consolidate a **Sustainable Business Model** that incorporates economic, environmental and social criteria.

Our stakeholders



Responding to the expectations of our stakeholders and working together to **generate shared value**, long-term relationships of trust, and a culture of sustainability within the organization is one of our goals. We work to generate a positive and significant social and environmental impact, through innovative and differentiating experiences.

Human Rights Management System

Background

In 2019 we started our process of building the Human Rights Management System, because the importance of them lies not only in the responsibility of the State but also the responsibility for the management of companies, considering the impact on the realization of fundamental rights, which require the management of mostly voluntary initiatives, to exercise commitments on this front.

In this way, we adopt the **United Nations Guiding Principles on Business and Human Rights¹**, which consist of 31 principles for implementing: *Protect, Respect and Remediate* framework to address corporate responsibility and human rights accountability. The principles were developed by UN Secretary-General Special Representative John Ruggie, giving rise to first global rules to prevent and remedy the possible violation of human rights. In this way the principles are focused on 3 chapters:

- The state of duty to protect against HHRR
- The responsibility of organizations in HHRR commitment
- Remediation actions and mechanisms

For this management system, four steps take place:



Source: Banco de Bogotá

- **Human Rights commitment**

The first stage in the definition of these guidelines in the Bank of Bogotá was the definition of a political commitment "BdB Human Rights Policy", which defines the commitments that we as a bank have with respect to our stakeholders and other related parties in our operation, carrying out a first approach to stakeholders and their expectations on the subject.

The approach to stakeholders was done through structured interviews and a survey evaluating the impact of possible human rights violations. With the results achieved, the priority commitments included in the Policy were defined.

This Policy is the first step in the consolidation of the Human Rights Management System of Banco de Bogotá, assuming the commitment to generate and systematically implement action plans that allow us to comply with the commitments stipulated in this Policy and the results of our Due Diligence process. It consists of 4 stages:

1. Documentary review of internal and external inputs
2. Interviews with internal actors

¹¹Guiding Principles of Companies and HRDs – Marco Ruggie:
https://www.ohchr.org/Documents/Issues/Business/IntroductionsGuidingPrinciples_sp.pdf

3. DDHH Risk Matrix
4. Involvement with interest groups

- **Due diligence process in HHRR**

The human rights due diligence approach in the company can be defined as how the company avoids and addresses the potential and/or real human rights risks arising from its business activities that could violate the human rights of related social actors.

Developing Due Diligence allows companies to anticipate, prevent and/or mitigate the impacts of the operation on human rights and thereby make decisions that are reflected in the implementation of good practices that positively impact the company's performance.

The scope of due diligence is linked to the particularities of the company's operating context, the legal context, as well as the potential and real impacts resulting from business operations and related relationships.



Source: Banco de Bogotá

Stakeholders' involvement

Collect relevant information on the perception of stakeholders in relation to the management of the Bank's HRDs, know the processes and mechanisms that already exist for the management of HRDs and identify the actual or potential risks of the bank's operation.

The involvement of the stakeholders helps us to identify and know the priority issues for stakeholders in relation to human rights, for a first exercise in validation of the commitments stipulated in the Policy and positively focuses on the perception of internal and external interest groups, in relation to the Bank.

In this way we perform:

Focus groups: three working groups that aimed to introduce the issue of Human Rights, the Bank's responsibility to respect them and to understand the perspective of stakeholders on the impacts and management of HHRR. Focus groups were developed with the aim of understanding the perception of external and internal stakeholders on the management of the Bank's human rights and identifying risks, impacts and priority opportunities. In this order of ideas, during due Diligence 3 focus groups were held at different times: suppliers, entities, collaborators, community's representation: women, local and national, foundations that helps indigenous people and children such as: UNICEF and Saving the Amazon.

Structured interviews with key players: introductory presentations to the topic of Human Rights that ended with a series of questions associated with the role of the person in the bank. We recognize that there are key players in the Company, who have a vision of the integral business; Under this logic, in-depth interviews allowed us to know the current management and future expectations of the leaders of the different areas of the company: risk, service, commercial, comptroller, banking companies, mass banking, sustainability, communications, HR, Board of Directors, investors, suppliers, operations and processes, information security and also groups representation from: collaborators, migrant workers, third – party contracted labor.

Identification and analysis of real or potential risks

Once the process of relationship and dialogue with stakeholders, new recurring issues were identified in relation to the Bank's human rights management, consolidating a list of risks that kept topics from the survey applied to the Policy, as well as new aspects, such as:

- Financial inclusion
- Money laundering and financing terrorism
- Violations of the human rights of business customers.
- Affecting the honor and reputation of customers.
- Gender inequity in the management team.
- Limited access to feedback and open dialogue on professional development.
- Evaluation and feedback processes.

The following is the list of risks according to the Bank's role and their description:

Bank as an employer

- Fraud and corruption
- Late payment of social security obligations
- Gender equity in the management team and in remuneration
- Occupational and/or sexual harassment.
- Excessive work hours/ Personal and work balance impact
- Violation of the privacy of the data of the collaborators.
- Exclusion of minorities in the staffing plant (ethnic minorities, persons with disabilities or with special needs)
- Employee discrimination
- Violation of collective bargaining
- Inequity by contractual types.
- Limited access to feedback and open dialogue on professional development

Bank as a service provider

- Violation of the privacy of customer data.
- Limited access to facilities, products, and information for the existence of some disability condition (physical, mobility, hearing, visual, communicative etc.)
- Exclusion in the conditions for accessing products and services
- Transparency in the sale of the products
- Money laundering and financing terrorism
- Human rights violations by business customers towards third parties
- Affecting customer honor and reputation
- Oral, visual and written communication does not include and that generates discrimination.
- Environmental impacts of the operation

Bank as a buyer of goods and services

- Corruption in the supplier recruitment process
- Misinformation in the process of contracting and developing the work of the bank's suppliers (relationship with suppliers as a partner)
- Violation of third-party human rights by suppliers

Bank as a lender

- Social and environmental impacts of funded projects.

Prioritization

According to the exercise carried out were defined whether these risks were real or potential. After the identification process was carried out, the valuation scales for impact and probability were defined to qualify the identified risks and obtain the inherent risk.

The following are:

1. Impact assessment scale

The scale of assessment of the impact of the identified risks was built on the basis of the guidelines raised by various international standards mentioning that the scales are determined under the particularities of each Company, however, they must take into account the severity, scope and possibility of remedying the impact.

In addition, the results of the survey of stakeholders for the definition of the Human Rights Policy were considered, once each of the proposed variables was rated, these will be added giving an absolute impact result where the assessment will be expressed at five levels.

2. Probability valuation scale

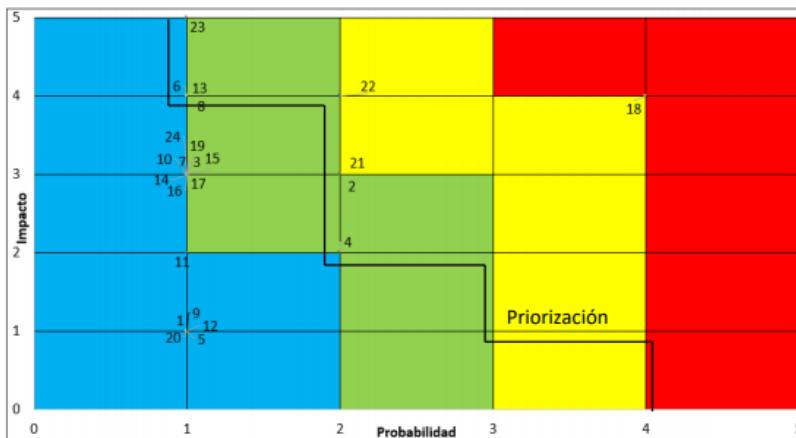
The probability scale had as its first criterion whether in the process of engaging with stakeholders it was identified that the risk was real or potential (considering whether this event happened, is happening or may happen) this assessment was made in the following real and potency way.

In addition, the other valuation variables were the rating of the Bank's risk experts, the number of mentions made by the sample selected for the dialogues within the Due Diligence process, and the results of a comparative exercise with processes developed by other financial sector entities, including the country's leading and global leaders considered by DJSI and Bank Track Human Rights Benchmark 2019.

After performing the qualification process of each of the variables defined for both probability and impact; the result of the inherent risk was obtained.

Finally, residual risk was calculated from the identified controls and the control rating methodology used by the Bank and agreed with the risk area.

Residual Risk Heat Map



- Prioritized risks**
- 2. Limited access to facilities, products, and information due to the existence of any condition of disability (physical, mobility, auditory, visual, communicative, etc.)
 - 4. Transparency in product sales
 - 6. Human rights violations by business customers towards third parties
 - 8. Oral, visual, and written communication that is not inclusive and that generates discrimination.
 - 13. Excessive working hours/ Affection of work-life balance
 - 18. Inequity by contractual types.
 - 21. Misinformation in the process of contracting and developing the work of the bank's suppliers (relationship with suppliers as a partner)
 - 22. Violation of the human rights of third parties by suppliers.
 - 23. Social and environmental impacts of funded projects.

- **Assessment**

We assessed our potential human rights issues across our business activities since 2019. In our own operations (including Joint Ventures where the company has management control) as a % of: Sites, we have assessed 100% of total assessed in last three years, the same as in our Contractors and Tier I Suppliers (as a % of contractors or Tier I Suppliers). 100% % of total assessed where risks have been identified in our own operations and contractors and 100% % of risks have mitigation or remediation process implemented as you can see in the table below.

Category	A. % of total assessed in last three years	B. % of total assessed where risks have been identified	C. % of risk with mitigation or remediation process implemented
Own Operations	100	100	100
Contractors and Tier I Suppliers	100	100	100

Note: We do not have any joint ventures at stakes above 10%.
Banco de Bogotá only contract with strategic partners such as providers of products and services.

- **Action plans**

After identifying the priority aspects of Human Rights Management within the bank, an analysis of the results was carried out focused on identifying the main risks /impacts (salient issues) on which to focus the management of the Bank.

Based on this analysis and considering the context of the bank's operation and the internal dynamics of the bank, plans are proposed to manage the identified risks and make the due diligence a dynamic and permanent process. This process resulted in **24 identified risks**, 8 prioritized risks from which 19 cross-cutting action plans for Communication and Training emerged, 10 related to the bank's risk in the role of buyer of goods and services, 11 action plans in the role of employer, 18 action plans in the role of service provider and finally 3 plans in the role of lender, for a total of **61 stock plans**, which focus on all interest groups evaluated such as: business customers, natural person customers, suppliers, communities and society, shareholders and investors and collaborators. We decided to work in mitigation plans in 7 of the 9 prioritize risks and plans and 1 related to Diversity, inclusion, and gender equality. See Report and disclosure (p:8).

The action plans: risk and impact, objective, actions, scope, type of measure, best practices, responsible areas, necessary resources.

Cross action plans

	Risk	Action Plans	Objective
Cross plans	Disclosure	Human Rights Training for Bank Employees	Raise awareness of the respect and protection of DDs. HH through the awareness and training of 100% of employees in key human rights concepts and the mechanisms defined by the bank for its management.
	Disclosure	Human Rights communication	Ensure that 100% of the Bank's internal and external communications are inclusive and respectful of human rights through the integration of HHRR criteria, within communications processes.
	Disclosure	Human Rights Management and Monitoring System	Define a human rights management and monitoring system to monitor the management indicators of the priority risks identified in the due diligence process and the defined action plans.
	Disclosure	Strengthening channels for receiving complaints and complaints	Strengthen the channels of reception of complaints and complaints and the ethics committee, expanding their scope and promotion, in order to consolidate them as the mechanisms of control and repair of possible violations of HHRR.

Specific and prioritized action plans

	Risk	Action plans	Objetive
Employer	Exclusion of minorities in the staff plant (ethnic, disabled, special needs etc.)	Promoting diversity in recruitment	Promote diversity in the bank's procurement with inclusive attraction processes that seek to increase minority representation at the Bank's staffing floor.
	Excessive work hours/ Personal and work balance impact	Promoting work-life balance	Raise awareness of the enjoyment of free time as a DDHH in all bank partners, especially in management positions, through the recognition of mental health as a fundamental part of OSH.
	Inequity by contractual types.	Closing gaps associated with the contract type	Reduce gaps in conditions and benefits between direct and indirect employees through the standardization of the direct and indirect recruitment process and joint work with companies responsible for outsourcing staff.
	Occupational and/or sexual harassment.	Zero tolerance to discrimination and child and sexual harassment	Promote a culture of inclusion and zero tolerance to discrimination and harassment through communication and awareness that generate healthy and respectful environments in HHRR & the strengthening of reporting channels and processes.
	Employee discrimination	Zero tolerance to discrimination and child and sexual harassment	Promote a culture of inclusion and zero tolerance to discrimination and harassment through communication and awareness that generate healthy and respectful environments in HHRR & the strengthening of reporting channels & processes.
Service provider	Lack of transparency in the sale of products	Transparent and fair sales processes	Ensure transparency and ethical behavior in the process of selling products and services through strengthening controls and principles of transparency, training and constant monitoring in order to avoid possible violations in sales processes and compensate for those that materialize.
	Exclusion in the conditions for accessing products and services	Inclusive products and services	Promote financial inclusion through the creation of inclusion guidelines and criteria in the design of products and services in order to expand coverage and access to bank products.
	Limited access to products or services for people with disability status	Inclusive access to people in a disability	Ensure access to the Bank's facilities or information to persons in a disability through the adequacy of the facilities and communication tools and the definition of an inclusive communication policy.
	Human rights violations by business customers to third parties*	Monitoring possible human rights violations by business client activities	Reduce the risk of human rights violations of business customer activities through evaluations and follow-up with ESG criteria for critical customers or products.
Buyer	Misinformation in the process of hiring and developing the work of the bank's suppliers	Strengthening relationships and communication with Suppliers	Strengthen relationships with suppliers through the definition of communication channels and constant feedback that allow to maintain relationships of mutual benefit in the long term.
	Violation of third party human rights by suppliers*.	Evaluation of suppliers with human rights criteria	Ensure that the activities carried out by the Bank's suppliers do not violate the human rights of its employees or third parties, through the inclusion of human rights criteria in the selection of suppliers and in periodic evaluations.
Lender	Social and environmental impacts of funded projects.*	Assessing the impacts of funded projects	Reduce the risks of possible human rights violations of Bank-funded projects through evaluation with previous ESG criteria and constant monitoring during project development.

* It refers to related, indirect risks in the Bank's operation.

For details of our action plans see **Annex 1. Action Plans on HHRR BdB.**

Report and disclosure

The process of building the Management System in HRHH will be known to all its stakeholders through the Structured Communication Plan for this purpose through the Bank's virtual channels through webinars, trainings, public documents and annual management and sustainability reports.

Anexx 1. Mitigating actions plans in HHRR

Currently we have: 19 cross actions, 42 specific in products, services and programs: 35 in an advanced stage and 26 in process.

Risk	Scope	Actions	Status
Training collaborators	Collaborators	Develop a training program (cycle) for all employees of the organization, using as a basis the Guiding Principles of Human Rights and Business, which presents the basic concepts of human rights, the importance of its management and the existing internal mechanisms to communicate and repair possible violations. This can be integrated into compulsory and annual entrance skills.	In process
		Create a discrimination and harassment training module to be considered as key aspects within interactions within bank.	Advanced
		Define area-specific training modules to deepen impacts on HHRR. of each workspace.	In process
		Define coverage targets and indicators related to training coverage and effectiveness, which allow monitoring compliance and effectiveness of the training plan.	Advanced
Respectful communication	All stakeholders	Update the Strategic Communications Policy including the articulation of communications governance and the evaluation of human rights criteria, within the different communication processes, as well as in the dynamics of the communications area.	Advanced
		Evaluate the communication channels used, against the stakeholders to which they are addressed and identify barriers or communication gaps that prevent communications from being clear and accessible to all audiences; for example, the use of legal or corporate jargon, the educational level of the audience, the mother tongue or conditions of disability.	Advanced
		Include in the communication plans an evaluation/control scheme through the definition of human rights criteria under which all communication pieces must be analyzed, ensuring that they will be enabled for all audiences without generating any discrimination, executed this process as part of the criteria of approval of the communication parts.	Advanced
		Integrate in the trademark manual aspects of inclusion that should be considered in the communication parts used by the Bank, considering the assessment made in the second numeral and the main risks/impacts (salient issues) on human rights.	Advanced
		Track the number of communications that have passed through the Human Rights filter, including the registration of discarded ones. Set goals for 100% analysis of communications under this assessment. Also, include criteria in the monitoring of HRD in the review of reputation monitoring.	In process

		Promote dual-track communication, through channels of receiving complaints and complaints as a mechanism to receive requirements around human rights, related to the communication parts of the bank.	In process
		Establish protocols to respond to external communications (from stakeholders to the bank) in an appropriate manner, without jailing respect for human rights; this includes both reviewing complaint and complaint response times and complaint protocols and including human rights criteria in crisis committee protocols (including those related to social media or protests). In addition, include human rights monitoring criteria in the reputation monitoring review.	Advanced
		To generate a mechanism for redressing communications-related human rights violations, which may be included in both crisis-care protocols and Bank processes; for example, a communication to customers apologizing for the delay in responding to their request or the simplification of the cancellation processes of products acquired by "misleading" or improper communication in the process of purchasing the product.	In process
Management and monitoring system in DDHH	All stakeholders	Define management indicators to measure the progress, efficiency and outcome of processes related to priority human rights risks and the progress of action plans to manage these risks. These indicators will be included in the Sustainability monitoring board.	In process
		Monitor indicators on a regular basis to identify opportunities for improvement effectively and correct deviations.	Advanced
		To allocate space in the annual management report to present the Bank's management approach to human rights, the performance of indicators and targets. Create a Human Rights report where the results of the Due Diligence process are presented.	Advanced
Strengthening the grievance and complaint system	All stakeholders	Strengthen all channels of reception of complaints and complaints, ethical line and coexistence committee as the mechanisms for reporting possible violations of HRDs through information campaigns on the procedures and requirements associated with these channels.	Advanced
		Define those responsible for the attention of the requirements associated with HRDs received through the traditional channels of the bank. Considering the existence of the Ethics Committee, expanding the scope of the committee, and training its members on Human Rights in order to consolidate itself as the supervisory body for the implementation of the Bank's HRD commitments, to achieve this the members of the committee must be trained in related issues.	In process
		Develop regular meetings of the Ethics Committee to follow up on the Bank's HRD management.	In process
		Define processes to respond to possible cases of human rights violations known through the different channels, including PQRS, that allow for repair processes	In process

Specific

Risk	Scope	Actions	Status
Strengthening relationships and communication with Suppliers	Suppliers	Consolidate mail that is in creation as a mechanism of constant communication between suppliers and the Bank, allowing suppliers to feel considered.	Advanced
		Enhancing the use of email licitaciones@bancodebogota.co as the tool that gives suppliers the possibility of consultations in the bidding process and include in the platform e-supplier feedback to the unelected suppliers.	Advanced
		Consider establishing a mechanism that allows suppliers to evaluate the Bank's management, including (but not limited to) human rights aspects. This assessment could be annual for active critical suppliers or at the end of the business relationship.	Advanced
		To make known to suppliers, from the bidding process, the lines of complaints and complaints and the ethical line where they can go if they are victims of any violation of human rights by the Bank, it is recommended to include in all RFPs an item that clarifies this information, as well as everything related to sustainability.	In process
Evaluation of suppliers with HRD criteria	Suppliers	Include in the supplier selection process evaluation criteria related to the protection of human rights (ESG criteria) and include within the evaluation of the proposal a percentage of the qualification related to these criteria.	In process
		Include standard clauses in all contracts that stipulate respect for human rights and good practices in ESG issues with suppliers.	In process
		To socialize with suppliers the importance of human rights and work together to adhere to the Bank's policies or create their own human rights guidelines, ensuring that suppliers meet HRD protection standards.	In process
		Design human rights training processes with critical suppliers, especially with security forces.	In process
		Include in periodic assessments of critical suppliers, criteria to monitor their management in terms of human rights and create procedures and action plans with suppliers in which human rights violation risks are identified that include their repair (by the supplier). This is given the Bank's progress with the supply chain sustainability partnership.	In process
		Support suppliers in understanding, establishing, or strengthening their own human rights management mechanisms, as well as in complaint and redress mechanisms to mitigate the risks of DD infringement. HH beyond the first link in the chain.	In process
Promoting work-life balance	Collaborators	Strengthen the management of risks related to the mental health of employees and stress management initiatives, incentives of healthy living habits and enjoyment of free time.	Advanced

		Strengthen and promote the tools provided by the bank for stress management and ensure the availability of coaches, counselors, psychologists, doctors, among others, who support in times of pressure and difficulties.	Advanced
		Continue to understand team leaders about the enjoyment of leisure time and work relationship with their team, seeking that they promote work-life balance and the use of welfare initiatives offered by the Bank.	Advanced
		Continue to conduct regular stress and job satisfaction surveys, which allow to analyze the situation of employees and generate improvement plans.	Advanced
		Promote the culture of work and personal life balance through initiatives such as regular feedback processes so that employees can express their level of satisfaction and well-being and corrective action can be taken in each work team when necessary.	Advanced
Closing gaps associated with the contract type	Collaborators	Identify contractual and salary benefit gaps by considering indicators of rotation, attraction, and training.	Advanced
		Analyze the possibility of rethinking the contracting model of the bank, gradually decreasing in number of outsourced collaborators.	Advanced
		Establish clear policies on contracting and contract migration processes as time and performance in the bank and integrate this plan into the hiring and induction process of the entity, aligning it with the partner's development plan.	Advanced
		Generate a plan to reduce gaps in conditions and benefits by working together with the companies responsible for outsourcing (e.g., Possibility of flexible hours, home office, participation in internal events etc.). This involves working together with the legal and purchasing area for the review and negotiation of counterfactual conditions with suppliers of human talent.	Advanced
		Establishing a process is evaluated periodically to ensure that positions held by indirect procurement comply with established policies.	Advanced
		Analyze time-in-time case that can migrate to direct procurement with the Bank according to established policies.	Advanced
Monitoring possible human rights violations by business client activities	Business customers	Include ESG criteria in business customer assessments, including, in addition to economic solvency and payment capacity studies, analysis of potential impacts of the company's activity and the performance of its human rights practices. You could extend the scope of ESRMS for this specific type of customer or design a form that includes those criteria for other types of customers.	Advanced

		Review and update customer and industry categories if necessary, based on customer and industry characteristics analysis, and define compliance or impact prevention policies. Also, review and renew the categories periodically.	Advanced
		Investigate compliance with the commitments set out in the Bank's Human Rights policy (where applicable) or verify that they have their own appropriate policy through the credit application form. This item can be included in the form mentioned in point 1.	In process
		Conduct a review of existing indicators that allow to report the number of products or customers evaluated with ESG criteria, analyzing whether it is necessary to create new indicators and defining short- medium and long-term goals that aim to achieve the evaluation of 100% of customers or critical products. In addition, report these indicators publicly.	Advanced
		Train business customer account owners to have the ability to identify warning signs of potential human rights violations in their relationship with their customers.	In process
		Ensure that commercial customers have complaint and complaint mechanisms that can know and remedy possible violations of human rights. This item may be included in the form referred to in point 1.	Advanced
		Develop a communication plan that makes visible not only the products offered by the Bank, but the result of the indicators raised for its follow-up, allowing to demonstrate the Bank's interest in promoting responsible products in terms of sustainability.	Advanced
Transparent and fair sales processes	Collaborators	Include respect for human rights in sales procedures and guidelines as a key to success in sales and customer retention. As well as a procedure for early cancellation of products due to transparent sale, an example of these insurance.	In process
		Strengthen the controls established for sales processes seeking to reduce the number of products and services returned by situations related to communication and transparency in the sales process.	In process
		Continue the process of monitoring the commercial management of insurance products, monitoring sales processes and demonstrating, through indicators, the number of products that were returned due to lack of transparency in the sale and customers who withdrew for this same reason. Publicly report these indicators.	In process

		<p>Conduct an annual analysis of other products (in addition to insurance) to ensure that there are no warning signs about sales transparency. When a product is identified with this risk, create an action plan and constantly monitor sales and early cancellation indicators, as is currently done with insurance.</p>	In process
		<p>To raise awareness among the commercial force of the importance of human rights and transparency in sales, established controls and defined monitoring indicators.</p>	In process
Inclusive access to people in a disability	All stakeholders	<p>Define a cross-cutting area responsible for inclusive access for people in a disability, that can make decisions and coordinate the strategy of physical and communication inclusion, both in the facilities and in the different channels of the bank.</p>	In process
		<p>Formalize minimum inclusion requirements for Bank facilities, and ensure that all new and intervened offices have these inclusion requirements in terms of physical disability, hearing, speech, blindness, etc.</p>	In process
		<p>Include inclusion criteria in transactional migration processes, which allow digital channels and solutions to be accessible to people in a disability.</p>	In process
		<p>Integrating into the communication policy a fragment of inclusive communication that stipulates the creation of different versions of the Bank's communications based on the ability to understand them by people with some type of disability.</p>	Advanced
		<p>To enhance and update differentiated care protocols in offices where there are no trained staff or defined tools, where technological resources such as video calls or personalized attention after the customer's visit are used. (<i>Relevo Program</i>).</p>	Advanced
		<p>Create a response procedure for accessibility-related complaints and analyze complaints and complaints related to this situation to identify opportunities for improvement.</p>	Advanced
Assessing the impacts of funded projects	Customers	<p>Continue with the implementation of the ESRMS system and include human rights criteria to assess the social impact of projects.</p>	Advanced
		<p>Promote the ESG impact monitoring mechanism during project development, which allows monitoring of the human rights performance of funded projects and includes action plans to mitigate the impact of violations identified at the Bank and if possible, on the persons concerned. As well as the report of progress, achievements and challenges based on analysis of the results of the indicators.</p>	Advanced
		<p>Define and report management and monitoring indicators to identify the number of projects evaluated, approved and unapproved against ESG criteria (which consider human rights) and the measures taken in the continuous evaluation processes; to be aligned with the tracking models already implemented by the Bank.</p>	Advanced

