

Human Rights Policy Banco de Occidente and Subsidiaries

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1. HUMAN RIGHTS POLICY

1.1 General Overview:

Building upon the United Nations Guiding Principles on Business and Human Rights, as well as the values established in our Code of Ethics and Conduct, Internal Work Regulations, and within the framework of our sustainability strategy, we set forth our corporate commitment to Promote, Respect, and Protect the Human Rights of individuals belonging to our stakeholder groups.

We aim to contribute to a better quality of life for individuals who are part of our stakeholder groups, understanding this to encompass economic conditions, labor relations, transparency of information, and environmental protection.

Aligned with this document are our Code of Ethics and Conduct, Internal Work Regulations, Selection and Hiring Policies, as well as other policy, manuals, and procedures issued by Banco de Occidente and Grupo Aval that may involve engagement with any stakeholder group and may seek to uphold and promote Human Rights.

1.2 Purpose

Establishing the policy that openly and publicly commits us to Protect, Respect, and Remedy the Human Rights of individuals within our stakeholder groups and, where necessary, to provide remedy to any victims of actions that deviate from this commitment.

1.3 Scope of Application

This policy represents the commitment to Human Rights by Banco de Occidente and its Subsidiaries.

The stakeholder groups we have identified and whose members we commit to respecting, promoting, and remedying their Human Rights are: Human Team, Customers, Partners, Board of Directors, Society and Environment, Shareholders and Investors, Suppliers, Government and Regulation, and Opinion Leaders.

Our commitment encompasses the following standards:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social, and Cultural Rights
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- United Nations Global Compact
- OECD Guidelines for Responsible Business Conduct

- Human rights enshrined in the Colombian Political Constitution and relevant laws and regulations governing human rights in Panama and Barbados for our subsidiaries operating in those jurisdictions
- United Nations Guiding Principles on Business and Human Rights
- Sustainable Development Goals (SDGs)

1.4 Commitments to Stakeholders

- We operate based on our ethical principles: Good Faith, Transparency, Equity, Prudence, Legality, Oversight, and Collaboration, in all our operations.
- We promote respect for every individual who is a member of any stakeholder group and reject any act that could violate their Human Rights.

i. Human Team

- We respect the Human Rights of our employees, providing them with a work environment based on respect, equal opportunities, balance, inclusiveness, and honesty.
- We reject any form of discrimination, including but not limited to gender (sex, gender identity, gender expression, sexual orientation), ethnicity, age, religion, disability (physical, sensory, intellectual, psychological), language, nationality, economic status, ideologies, or any other condition. We investigate any such incidents and seek proper remedies for those affected.
- We prioritize the mental and physical well-being of our employees, ensuring a workplace free from harassment and abuse. We have established a Health and Safety system that safeguards the protection and integrity of our employees.
- We both respect and encourage the freedom of association and uphold the provisions outlined in collective bargaining agreements.
- We value due process, conducting investigations that respect the rights of our employees and provide them with fair treatment. We approach each case with attentiveness and careful consideration.

ii. Customers

- We provide transparent, accurate, timely, and relevant information about our products, services, and processes.
- We work to ensure access for all our customers, including those with disabilities (physical, sensory, intellectual, psychological).

- We protect our customers' personal data, ensuring confidentiality, and we actively collaborate to identify and address any violations that may compromise their integrity.
- We treat all our customers with respect, without any form of discrimination based on gender, age, religion, language, race, nationality, economic status, ideologies, or any other condition.

iii. Partners

- We collaborate with strategic partners to contribute to the development of our country.
- These alliances are built on a shared commitment to human rights and we collaborate to prevent any violations from occurring.

iv. Society and the Environment

- In alignment with our sustainability strategy, we promote respect and care for the environment, recognizing its crucial role in our business ecosystem.
- We strive to reduce our carbon footprint and minimize negative environmental impacts.
- We advocate publicly for the respect of human rights for all individuals.

v. Suppliers

- We refrain from engaging with suppliers who have a documented history of non-compliance with human rights, workplace health and safety, legal compliance, taxation, environmental matters, or labor practices.
- Our suppliers must share our principles and commitment to protect, respect, and remedy human rights for their stakeholders and those they interact with. They actively participate in remediation processes whenever necessary.

vi. Board of Directors

- We have the commitment of our Board of Directors to protect, respect, and remedy the human rights of our stakeholders at the highest level of corporate governance within our bank. Our goal is to proactively prevent any human rights violations

vii. Shareholders and Investors

- We consistently meet the expectations of our shareholders and investors by fulfilling our duties and complying with relevant legislation.
- Our success stems from our transparent and respectful interactions with all individuals involved.

viii. Governance and Regulation

- We also prioritize compliance with human rights legislation in the countries where we operate and actively cooperate in remediation efforts when our involvement is deemed necessary.

ix. Opinion Leaders

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- We uphold the values of clarity, truthfulness, sufficiency, timeliness, verifiability, understandability, accuracy, and relevance when providing information, always respecting the confidentiality parameters of our Bank.

1.5 Mechanisms of Assistance

For any Requests, Complaints, Claims, or Suggestions, we have the following mechanisms: Banco

de Occidente Ethics Hotline: <https://www.bancodeoccidente.com.co/wps/portal/banco-de-occidente/bancodeoccidente/footer/otros/linea-etica>

Fiduciaria de Occidente Ethics Hotline:
<https://www.fiduoccidente.com/linea-Etica>

Banco de Occidente Customer Service:
Email: servicio@bancodeoccidente.com.co
National Hotline: 018000514652

Fiduciaria de Occidente Customer Service:
Email: atencionalconsumidorfdo@fiduoccidente.com.co
National Hotline: 01 8000 521 144

Banco de Occidente Workplace Environment: ambientelaboral@bancodeoccidente.com.co
Fiduciaria de Occidente Workplace Environment: comiteconvivencia@fiduoccidente.com.co

Financial Consumer Ombudsman's Office: Carrera 7
No 71-52 Tower A Floor 1 Bogotá Phone: (601)
7462060 ext. 15318 y 15311
defensoriacliente@bancodeoccidente.com.co
defensordelconsumidorfdo@fiduoccidente.com.co

2. Commitment Banco de Occidente and its Subsidiaries to EQUITY, DIVERSITY AND INCLUSION

At Banco de Occidente and our Subsidiaries, we share a common purpose, knowing that achieving it relies on our human team, which reflects the values and identity our organizations have established over the years.

Respect, a fundamental value in our corporate culture, permeates all our operations, reaffirming our commitment to protecting human rights and fostering diverse environments free from discrimination, violence, and workplace harassment. This commitment ensures the physical, mental, and social well-being of our collaborators and stakeholders, as stated in our Diversity and Inclusion Policy, Human Rights Policy, Internal Work Regulations, and Code of Ethics and Conduct, all in compliance with prevailing legal requirements.

In the bank, we promote equity, diversity, and inclusion, considering women, LGBTQIA+ individuals, persons with disabilities, ethnic groups, migrants, veterans, and the elderly. This is accomplished through the design and implementation of guidelines to:

- Ensure fair, just, and impartial treatment in various internal and external processes, such as financial consumer service across our different channels (branch network, Contact Center, and social media), selection and hiring strategies, talent retention, training plans, professional growth, compensation, emotional benefits, supplier engagement, and more. These guidelines are applied regardless of ethnic background, gender identity, sexual orientation,

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political or religious affiliation, nationality, disability, age, marital status, socioeconomic situation, etc.

- Promote talent management based on competencies and work capabilities rather than biases related to individual diversity.
- Establish processes that strengthen access to financial products and services for the aforementioned populations, ensuring that our portfolio is offered without distinction.
- Enhance cultural transformation through education and training of our human team, fostering knowledge of manuals, policies, procedures, etc., to prevent the emergence of discriminatory environments.
- Guide our messages across various internal and external communication channels, avoiding stereotypes and promoting diversity and inclusion.

This policy takes effect as of the date of publication.

Cesar Prado Villegas
President of Banco de Occidente

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Director of Sustainability

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