



CODE OF ETHICS AND CONDUCT

BANCO DE OCCIDENTE S.A.

SUPERINTENDENCIA FINANCIERA
DE COLOMBIA

V.F.I.E.L.A.D.D.



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Presentation

Banco de Occidente SA, under the ethical and moral principles it applies in its activities, strives to ensure that the conduct of its employees is framed within upright, honest, and credible behavior in order to protect the trust placed in it by its customers, users, and the community at large.

To achieve this objective, the Code of Ethics and Conduct contains values, principles, and minimum rules of conduct that must be observed in all financial, credit, and foreign exchange transactions, as well as in the development of all the Bank's activities. It was developed

In accordance with the laws of the Republic of Colombia, observing the rules of the Organic Statute of the Financial System and the regulations set forth in External Circular (Basic Legal) No. 029 of 2014, issued by the Financial Superintendency of Colombia. It is a formal invitation to promote and reinforce the obligation to maintain positive conduct related to doing things correctly and ensuring that the organization's philosophy is fully understood.

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Banco de Occidente, as part of the Aval Group, shares the principle of zero tolerance for the giving and/or receiving of any type of gifts, bribes, and/or corrupt payments of any kind in the course of its business, as well as any corrupt, fraudulent, discriminatory, workplace or sexual harassment, child labor, or any other conduct that violates human rights and/or applicable law.

This approach is known to employees and must be made known to shareholders, suppliers, advisors, agents, intermediaries, and, in general, to any counterparty with whom we have a relationship and/or influence.

In accordance with the above, the Bank and/or Grupo Aval's ethics line is available, and our employees are expected to escalate and/or report any anomaly or suspicion of which they become aware.

Therefore, this code is mandatory for each and every Banco de Occidente employee, who must prioritize ethical principles over achieving work, business, or personal goals in their actions.



The Vice Presidency of Human Talent and Administration and the Internal Audit, Compliance, and Banking and Information Security Departments will, during their periodic visits, assess the degree of compliance with organizational standards and procedures to detect deviations and take the necessary corrective measures.

It is the duty of each employee to report situations that violate the principles outlined in this code.

The acts or omissions referred to in the legal provisions mentioned in this document, or the acts or omissions that modify or add to such rules, are classified as serious offenses that will allow Banco de Occidente to terminate the employment contract with just cause, in accordance with the provisions of the Internal Labor Regulations, the Substantive Labor Code and other laws on the matter.

Cordially,

GERARDO JOSE SILVA CASTRO

President

Question of Ethics

This Code will help you understand how to act appropriately in various situations involving the Bank, other employees, clients, suppliers, the government, stakeholders, and other stakeholders. It also covers some mechanisms for resolving conflicts, in accordance with your personal responsibilities.

Situations may arise that are not foreseen in the Code of Ethics and Conduct. In these cases, you should consider the most appropriate approach to resolving the problem without violating this Code, the Internal Work Regulations, the law, or any other applicable regulations.

When faced with these types of situations and before making any decision, you should ask yourself:

- ¿ Is my performance in accordance with the Code of Ethics and Conduct, the Internal Work Regulations and applicable regulations?
- ¿ Is there anything wrong with this situation?
- ¿ Am I fully authorized to decide on the situation?
- ¿ What impact could my decision have on the Bank, others, or my family?

- ¿ Could what I do or fail to do appear to be wrong behavior?
do?
- ¿ What could be the consequences of what I do or do not do?
to do?
- ¿ Should I report this situation to the control areas?

It's important to use your judgment and common sense, because when something doesn't seem ethical, right, or dishonest, it probably is.

If you have any questions or concerns about the best course of action in a particular situation, it is your duty to report the matter to your immediate supervisor or the person responsible for the process. If the scope of your concern warrants it, it is your duty to inform other areas such as the Vice President of Human Talent and Administration and the Internal Audit, Compliance, and Banking and Information Security Departments.

If you have any questions regarding the legal risks of any decision, it is your duty to promptly request the opinion of the Bank's Legal Division.



Scope of Application

This update to the Code of Ethics and Conduct will take effect on September 9, 2024.

The rules established in this Code are mandatory for all Banco de Occidente employees.

Employees will prioritize principles and values in all their actions, as they seek to orient all behaviors toward compliance with Colombian law.

Leaders will ensure that their employees read the Code of Ethics and Conduct and understand the importance of complying with it.

1. Principles and Values

1.1 Ethical Principles

Banco de Occidente employees must conduct business and perform their duties with loyalty, clarity, transparency, precision, commercial integrity, seriousness, and compliance to create values in pursuit of social well-being, adjusting their conduct so that, through it, they "act under ethical conditions of responsibility, character, and professional suitability, prioritizing the general interest over particular interests." To this end, they must act in accordance with the following principles:

Good Faith and Loyalty

In every transaction or business, good faith must always come first, and one must act with honesty, sincerity, and loyalty.

Employees, clients, suppliers, contractors, and other stakeholders undertake to act ethically and fairly toward the Bank, its shareholders and investors, stakeholders, and/or third parties, always observing and ensuring compliance with the regulations.

Transparency

Banco de Occidente and its employees are committed to conducting their operations under optimal conditions, with the goal of ensuring the provision of financial information to clients, users, shareholders, regulatory bodies, and the community in general, in a clear, comprehensive, accurate, and timely manner.

Equity

Equality must be guaranteed in the offering of products and services, regardless of personal or third-party benefits. Employees, customers, suppliers, contractors, etc. must be treated fairly and responsibly.

Likewise, any discriminatory conduct based on gender, ethnicity, religion, political affiliation, disability, among others, is prohibited.

Prudence

Collaborators must act in accordance with the correct understanding of the risks associated with business development, which involves evaluating that in each decision taken, good judgment prevails and



criteria; identifying, measuring, and managing risks and recognizing the value of information and the importance of ensuring its confidentiality.

Self-Control and Self-Regulation Banco

de Occidente employees are required to comply with self-control and self-regulation criteria as a fundamental tool for preventing, detecting, monitoring, and mitigating the various risks to which the organization is exposed. These criteria are clearly communicated so that they are useful.

Legality

All activities must be carried out in compliance with the Colombian Constitution, the laws, policies, regulations, and controls, both internal and those of the competent authorities, and in particular, the regulations governing financial and foreign exchange activities.

Audit

It indicates that commercial, financial, and accounting transactions must be subject to ongoing management and results oversight, in order to reasonably ensure that the interests of shareholders, clients, and users are being safeguarded, verifying the degree of compliance with the legal and internal policies, rules, and procedures that regulate the financial and foreign exchange operations of Banco de Occidente.

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Collaboration

We must cooperate with national authorities in the fight against money laundering and terrorist financing, among other illegal actions.

National and international conventions signed by the State must be adopted and unconditionally respected, especially those related to the prevention, detection, and reporting of operations involving criminal activities, such as money laundering and terrorist financing.

Confidentiality

All official or private information belonging to the company, its employees, shareholders, or third parties will be protected. Banco de Occidente employees will treat confidential or privileged information appropriately, prudently, and confidentially, and will therefore refrain from using it in any other manner and/or providing it to third parties without the appropriate authorization or for improper purposes. Information will be treated with integrity, discretion, privacy, and confidentiality, in compliance with current legal provisions.

Truth and Honor. Banco de

Occidente is committed to non-tolerance of any breach or wrongdoing, thus prioritizing the general interest over the individual. Consequently, the statements and information provided by employees will always be consistent with reality and the facts, protecting the good name and image of the organization, its employees, shareholders, controlling entities, clients, third parties, and others.

Sustainability

Banco de Occidente recognizes its role in the development of society, as well as the importance and impact of proper conduct as a factor contributing to the generation of economic, social, and environmental well-being for the community and, especially, for the transformation of the country.

1.2 Corporate Values

Corporate Values represent our way of acting and define where we want to take the organization. They also promote the desired behaviors in our employees to achieve our strategic objectives. To achieve this, they must act in accordance with the following values:

Honesty

We generate trust through consistency between what we think, say, and do.

Some of the behaviors that we associate with this value at the Bank are:

- Our actions reflect the Bank's philosophy.
- We act by example, within the rules and laws.
- We keep our promises and commitments.
- We are clear, concrete and we assume the consequences of our actions. act.

I respect

We recognize and value people in their integrity.

Some of the behaviors that we associate with this value at the Bank are:

- We have a friendly and cordial relationship with all people (leaders, colleagues, clients, shareholders and stakeholders).
- We recognize and understand diversity in all its forms dimensions.



• We respect the rules, the laws and we do not exceed our faculties.

• We are close and we generate trust through listening, service and disposition.

Cooperation

We work together to make things happen.

Some of the behaviors that we associate with this value at the Bank are:

• We generate collaborative networks.

• We work together to deliver our value proposition.

• We share the same goal.

Determination

We believe in our ability and talent to make things happen.

Some of the behaviors that we associate with this value at the Bank are:

• We give our best to achieve our goals.

• We accept mistakes as an opportunity to learn and make the necessary changes to avoid repeating them.

• We make things simple with resourcefulness, agility and quality, within the framework of legality and regulations.

We have the courage to do different things, to make decisions coherent, consistent and go the extra mile.

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2. Our Conduct

2.1 Compliance with Principles

Every activity undertaken must be carried out with the utmost diligence, timeliness, and reliability, seeking to achieve organizational objectives without deviating from ethical and moral principles, legal, and internal mandates.

All employees are required to report to the Bank's supervisory bodies (Vice-Presidency of Human Talent and Administration and the Internal Audit, Compliance, and Banking and Information Security Departments), as appropriate, all transactions detected as irregular, unusual, and/or which, in their opinion, warrant investigation.

2.2 Powers

The products and services provided to customers and users are governed by rules and policies regarding the responsibilities that must be met depending on the product type, amount, and type of service.

No employee, in the performance of his or her duties, may exceed the powers granted to him or her, nor may he or she commit the Bank expressly or tacitly, formally or informally, until he or she has been authorized to do so in writing.

2.3 Efficient Expenses

Expenses incurred by Banco de Occidente must be consistent with operational and administrative needs. Employees must not earn profits as a result of authorized expenditures.

Those who approve expense reports in accordance with current procedures are responsible for their reasonableness and for verifying their timeliness and reliability.

2.4 Use of Assets

Banco de Occidente's tangible and intangible assets are for its exclusive use and must fulfill the purpose for which they were acquired.

It is the duty of employees to protect and use the Bank's assets appropriately and never for personal benefit or that of anyone outside the organization.

Every employee must be responsible for the securities, money, documents, equipment, keys, and work items assigned to them, managed by them, or under their charge due to their duties.

2.5 Goods Received as Payment in Kind

The receipt and administration of assets received as payments in kind, as well as the disposal process, will be carried out in compliance with the policies established by the Bank, always acting in accordance with the principles and values guiding this code.



2.6 Legal Situation Report

Except in cases provided for by law, Bank employees are required to notify the Vice President of Human Resources and Administration and the Internal Audit, Compliance, and Banking and Information Security Departments if they have been arrested, summoned, appeared before a judge, arraigned, charged, or convicted of any criminal offense.

2.7 Information Registration

It is the duty of all Bank employees, in accordance with current procedures, to ensure the correct recording of internal operations, transactions, and customer information, ensuring the necessary information is available to generate accurate and timely reports for management, shareholders, and supervisory bodies.

2.8 Internal Control Conduct Risk

All Bank employees must evaluate and monitor their work, detecting potential deviations and implementing corrective measures in the performance and fulfillment of their duties. This allows the organization to improve efficiency in the development of its activities, prevent and mitigate the occurrence of internal and external fraud, adequately manage risks, increase the reliability and timeliness of the information generated, comply with applicable regulations, protect the organization's assets, and prevent and mitigate the occurrence of acts of corruption.

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To achieve the above objectives, all employees must adhere to the principles of self-control, self-regulation, and self-management.

2.9 Leader's Responsibility to his Collaborators

Leaders must ensure that their employees comply with the processes, procedures, policies, and provisions contained in the Employment Contract, the Internal Work Regulations, the Code of Ethics and Conduct, and other internal or external rules, policies, and regulations that govern the Bank's administrative, operational, or commercial affairs and functions.

2.10 Compliance with the standard

All Bank employees must comply with the labor obligations and prohibitions contained in this Code, the employment contract, the Internal Work Regulations, current and/or future policies, manuals, and circulars issued by the Bank, as well as with the legal provisions in force in Colombia.

In particular, the provisions of regulations related to workplace and/or sexual harassment, human rights, occupational health and safety, the environment, and foreign exchange and/or financial transactions must be taken into account.

2.11 Conduct towards Competition, Monopolies and Integrity of the Market

Banco de Occidente is committed to protecting competition in the financial and other markets in which it operates. Consequently, employees must comply with the provisions of Decree 2153 of 1992, regulations of the Superintendency of Industry and Commerce, and any other regulations that may add to, complement, modify, or replace them regarding the protection of competition, anticompetitive behavior, and antitrust in order to avoid engaging in such practices.

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Any employee who violates the provisions preserving jurisdiction in the Colombian legal system will be subject to the sanctions stipulated in this code, Colombian civil and criminal law, and the provisions of the employment contract.

To this end, Bank employees must avoid, within the scope of their duties:

- Violate the advertising regulations contained in the statute of consumer protection.
- Influencing a company to increase the prices of its products or services or to desist from its intention to lower prices.
- Refusing to sell or provide services to a company or discriminating against it when this could be understood as retaliation for its pricing policy.
- The reduction of prices below costs when the objective is to eliminate one or more competitors or prevent their entry or expansion.



- y The application of discriminatory conditions for equivalent transactions, which place a consumer or supplier at a disadvantage compared to another consumer or supplier with similar conditions.
- y Carry out acts that have the purpose or effect of subordinating the supply of a product to the acceptance of additional obligations, which by their nature did not constitute the purpose of the business, without prejudice to the provisions of other provisions.
- y The sale to one buyer on terms different from those offered to another buyer when it is intended to eliminate competition in the market.
- y Selling or providing services in some part of Colombian territory at a price different from that offered in another part of Colombian territory, when the intention or effect of the practice is to eliminate competition in that part of the country and the price does not correspond to the cost structure of the transaction.

2.12 Prohibited Situations

It is the responsibility of each of the organization's employees to ensure compliance with legal and internal regulations. Reverential fear (permissive loyalty in violation of rules by the leader) must not exist.

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The prohibited situations in the Bank are:

- a. Establishing a business relationship with a client without taking into account the internal instructions and procedures issued for that purpose, even when dealing with recommended individuals.
- b. Exempt clients from completing the "Cash Transaction Declaration" form, in compliance with current regulations defined by the Colombian Financial Superintendency, without being authorized or empowered in accordance with the internal procedure established for this purpose.
- c. Accepting cash transactions equal to or greater than \$10,000,000 or USD5,000 without completing the "Cash Declaration" form, in accordance with current procedures.

- d. Insist on clients or users splitting cash transactions in order to circumvent established controls.
- e. Inform customers about administrative or judicial actions taken against them by the competent authorities or the Bank's supervisory bodies; customers will only be notified of embargo measures once they have been implemented.
- f. Disclose private and/or privileged information about the organization, its clients or collaborators to external entities or other collaborators whose position does not require their knowledge.
- g. Delay or omission of assigned functions, due to proven negligence or arbitrariness.
"Knowing that he should not do it, he does it and vice versa."
- h. Exceeding the powers granted in accordance with organizational policies based on the product type, amount, and type of operation.
- i. Facilitate, promote, or execute any practice that has the purpose or effect of tax evasion and/or alters compliance with current tax information exchange agreements.
- j. Accepting gifts, courtesies, presents, favors, or gratuities from clients, suppliers, and internal or external counterparties that compromise the commercial freedom or decisions of the employee and the Bank, under the terms established in this code and other internal and external regulations.
- k. Appearing while intoxicated, or under the influence of narcotics or intoxicating drugs.
- l. Use the Bank's products, services, or resources for personal benefit, directly or indirectly through third parties, without authorization from the authorized body. Products and services are considered to be those offered by the organization within its corporate purpose and resources, as well as the physical facilities and equipment necessary to carry out the Bank's activities.
- m. Intervene during working hours in demonstrations or public meetings of political parties.



- n. Discriminate against or favor clients, third parties, or colleagues in the performance of their duties based on their political affiliation, religious creed, ethnic origin, sexual orientation, identity, or preference.
- o. Report in a timely manner all situations that generate a conflict of interest (one's own or that of a third party).
- p. Committing or permitting acts of fraud or irregular allocation in relation to the recognition and payment of interest, commissions, purchases, expenses, among others, charged to the Bank.
- q. Issue certifications and statements that do not correspond to the truth of the certified facts, issue them by unauthorized persons, or provide false or altered documentation.
- r. Signing credit documents or internal forms of the Bank without having the express written authority or authority to do so.
- s. Exceeding the powers and authority assigned to the position, failing to comply with the functions, processes, procedures, policies and other internal regulations.
- t. Omitting functions, processes, procedures, policies and internal standards under the pretext of necessity, opportunity and effectiveness in the service.
- u. To administer, assign, distribute or use in an irregular manner without compliance with the processes, the economic, physical and computer resources for the fulfillment of the functions assigned to the post.
- v. Fail to impose sanctions on personnel in charge, when these are authorized or determined by the Operating Committee of each zone, the National Operating Committee or by the Labor Relations or Human Talent area of each zone.
- w. Allowing Banco de Occidente facilities and the services it provides to clients and users to be used to cover up illegal activities or failing to report them when detected.
- x. Request or offer loans to the Bank's suppliers or clients, whether they are companies or individuals specialized in this type of activities.

- and.** Request or offer loans to other collaborators of the Bank.
- z.** Promote and/or actively or passively participate in activities that may be considered Mass and Regular Raising of Money ("chains, pyramids, planes, multi-level" or similar activities that generate promises of high economic returns, nor may the Bank's facilities be provided, nor may payroll accounts be supplied for such purposes.
- aa.** Participate in or promote raffles and/or fundraisers for profit.
- ab.** Offering financial services or professional expertise to third parties (related to the position held at the Bank) without the express authorization of the Labor Relations or Human Resources Department of each Zone, who will assess any potential conflict of interest. If the case warrants it, it will be submitted for consideration by the National Operating Committee.

Non-financial activities such as university teaching or educational services are exempt.

Acts that violate morality and good customs , or that jeopardize the Bank's reputation and good name.

- ad.** Failure to comply with current policies regarding Personal Data Protection and unauthorized processing of personal databases of clients and non-clients.
- ae.** Failure to substantiate the origin of funds entering the payroll account in accordance with the policies established by the Bank for its clients, when required by regulatory bodies.
- Extracting customer databases from the Bank for personal or third-party benefit, as well as managing customer databases from sources not authorized by the Bank .
- Facilitate the placement and/or acquisition of Bank products with false or altered documentation or with information that is far from reality .
- Ah.** Other acts or omissions that the law or the Internal Work Regulations define as misconduct.



3. Anti-Fraud Policy

Honesty and integrity should never be compromised by committing fraud.

Misuse of the Bank's resources and fraud are committed when information is intentionally concealed, altered, falsified, or omitted for one's own benefit or that of others. Internal fraud is a malicious act carried out by an employee, revealing a deceptive intent, intended to harm and affect the Bank by taking advantage of their power, status, or handling of privileged information.

Fraud may be motivated by the possibility of obtaining something of value (such as meeting a performance objective or obtaining payment) or by avoiding negative consequences such as disciplinary proceedings.

Attempted fraud is defined as:

- Misuse of Bank funds is made without due authorization.
- Contracts or agreements are entered into in the name of the Bank, without express authorization to do so.
- Bank applications and systems are accessed to carry out activities that are not related to the assigned function(s) and/or task(s).
- When a malicious act is carried out with the aim of obtaining personal benefit or causing harm to the Bank or the entrusted work, thus, the result does not materialize due to causes beyond the control of the collaborator.
- The placement and/or acquisition of Bank products is facilitated with false or altered documentation or information that is far from reality.

4. Anti-Bribery and Anti-Corruption Policy

Banco de Occidente and its subsidiaries are committed to a zero-tolerance policy against corruption in any form and promote a culture of combating it, enabling them to conduct business and operations with high ethical standards and in compliance with current laws and regulations.

In accordance with the above, the Bank has adopted an Anti-Bribery and Anti-Corruption Policy based on current Colombian legislation and the U.S. Anti-Corruption Law: Foreign Corrupt Practices Act (FCPA).

Bank employees may not solicit or accept promises of improper payments from public or private officials (including members of political parties and officials of multilateral international organizations) when the purpose of such payments is to obtain or retain business, secure an advantage, or improperly influence the Bank's official actions.

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Bank employees may not offer or deliver anything of value, nor promise unauthorized financial or other benefits to any person, whether a government official, a member of such official's family, a third party, or a non-profit organization suggested by the recipient, with the aim of influencing the recipient to take or refrain from taking any official action, or inducing the recipient to maintain or conduct business with the Bank.

Improper payments made indirectly through an intermediary are also subject to the same regulations and penalties.

In addition to offering or giving improper payments, gifts or entertainment, offering employment opportunities to a government official or a member of his or her family also for the purpose of obtaining an improper advantage may constitute a violation of domestic and extraterritorial anti-bribery laws.



5. SARLAFT Policy

The Money Laundering and Terrorism Financing Risk Management System (hereinafter SARLAFT) contains values, principles, policies, procedures and minimum rules of conduct that must be observed in all financial and foreign exchange transactions of the Bank, which as a supervised organization, must establish minimum criteria and parameters that allow it to manage risk events related to Money Laundering, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction (hereinafter LA/FT/FPADM).

It should be noted that SARLAFT consists of two phases: the first, which corresponds to risk prevention, aims to prevent the introduction into the financial system of resources from activities related to money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction (ML/TF/FPADM); the second, which corresponds to control, aims to detect and report on attempted or actual transactions, in an attempt to give the appearance of legality to transactions linked to ML/TF/FPADM.

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The application of SARLAFT policies and procedures is mandatory for all employees associated with the Bank, who receive training through various means regulated in the SARLAFT Manual.

They will also ensure compliance with the law and related regulations established by the supervisory bodies.

It is the responsibility of the Bank's management, the oversight bodies (Audit and Statutory Auditor), the Compliance Officer, and, in general, all of the organization's employees, to ensure compliance with current policies and procedures related to SARLAFT.

The SARLAFT Manual contains the general guidelines adopted by the Bank, describes each of the stages and elements of the system, as well as the Risk Factors, the agents that generate the risk of ML/FT (Clients/Users, Products, Distribution Channels and Jurisdictions), and the risks associated with AML/FT, and those through which the AML/FT risk materializes (reputational, legal, operational and contagion).

The Bank's SARLAFT has more demanding guidelines for customer linking and monitoring of operations of national or foreign persons who, due to their profile or the functions they perform, may

expose the organization to a greater degree to the risk of ML/TF, as is the case with PEPs (Politically Exposed Persons).

For clients considered to be at high risk for money laundering/terrorist financing, the Bank will establish mechanisms for their identification and ongoing monitoring.

It is the Bank's employees' obligation to prioritize compliance with AML/CFT risk management regulations over achieving business goals.

In case of doubt or suspicion related to the commission of an activity related to SARLAFT risk, including unusual transactions and those related to the identification and reporting of suspicious transactions, all Bank employees must consult the Compliance Department for verification and/or review.

6. Operational Risk Policy

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The Operational Risk Management System (SARO) (Operational Risk and Business Continuity Risk) enables organizations to manage their processes by identifying and managing risks and strengthening their internal control system.

This system contains policies, procedures, documentation, operational risk event logs, information disclosure, and training that aim to achieve effective operational risk management.

All Bank employees are responsible for properly managing the Operational Risk Management System (SARO) (Operational Risk and Business Continuity Risk), identifying process risks, implementing controls to prevent risk events, and reporting materialized risk events with the corresponding corrective actions to mitigate them. This is established in the SARO manual (MAN-APY-038).



All Bank employees are required to ensure compliance with and implementation of good practices for operational and conduct risk. Likewise, designated Operational Risk Managers and/or process owners must perform the functions and responsibilities established in the Operational Risk and Conduct Risk manuals.

7. Bank Reserve

Bank employees must protect confidential information disclosed by their clients, users, and the organization. Handling this information involves:

- a. Do not reveal information about the Bank, its clients or collaborators to people who do not belong to the Bank or who, although belonging to the Bank, are not authorized to know it.
- b. Not to use for one's own benefit or that of others, privileged information that one has learned by virtue of one's duties.
- c. Provide, to the extent necessary, the information required by the organization's departments.
- d. Refrain from making comments in the workplace, at home, at social engagements and other public places that may harm the interests of: managers, employees, clients, users and shareholders.

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The Bank must guarantee the confidentiality of the information reported in accordance with Article 105 of the Organic Statute of the Financial System.

Bank confidentiality is not enforceable against specific requests for information made by authorities within the framework of investigations within their jurisdiction. If you are unsure about the jurisdiction of an Administrative or Judicial Authority to hear such information, you should consult the Bank's Legal Vice Presidency.

7.1 Confidentiality of Information

According to the definition by the Colombian Financial Superintendency, privileged information is understood to be "information to which only certain persons have direct access by virtue of their profession or occupation, which, due to its nature, is subject to confidentiality, and which, if known, could be used to obtain profit or benefit for oneself or a third party."

In accordance with Article 75 of Law 45 of 1990 and without prejudice to the provisions of Article 27 of Law 190 of 1995, and any regulations that modify or complement them, it shall be understood that privileged information is that of a specific nature that has not been made known to the public and that, had it been made public, a reasonably diligent and prudent investor would have taken it into account when negotiating the respective securities.

Bank employees must protect the confidentiality of confidential information disclosed to them in connection with or in the performance of their duties, including information related to criminal, civil, or commercial investigations into client actions. This confidentiality includes unusual transactions detected in the offices or reports of suspicious transactions submitted to the UIAF or any other competent authority. In any case, the Bank's executives and employees must refrain at all times from taking undue advantage of such information to obtain any type of personal benefit, for themselves or for third parties, under penalty of the criminal or administrative implications that may arise from their conduct.

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Information management involves:

- a. Do not reveal the organization's information to people who do not belong to it or who, although belonging to it, are not authorized to know it.
- b. Not to use for one's own or another's benefit the privileged information that one has learned by reason of or by virtue of one's duties.

Under no circumstances should information processed by the Compliance Department be disclosed to clients or third parties. This includes concepts, client analyses, or internal decisions.



7.2 Attention to Requirements

Customer Requirements

Bank employees are committed to addressing customer concerns and complaints with integrity, kindness, and prudence.

Explain to clients how each service operates, inform them of the organization's ability to meet its commitments, and any changes to the terms of the contractual relationship. This means ensuring a clear understanding of all the elements necessary to close the deal or transaction.

Provide clients with relevant information for conducting transactions, as well as timely delivery of business documentation in accordance with the agreed-upon method, whether physical or through mechanical or electronic account entries.

Provide internal departments, clients, and external entities with accurate and timely information that is not confidential or privileged.

Disclose the nature and extent of any conflict of interest and treat it fairly and equitably. If this is not possible, they must refrain from carrying out the transaction.

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Requirements of Competent Authorities

Provide timely and truthful information required by the surveillance and control authorities, complying with the procedures established by the organization in the Procedures Manual for Attention to Requirements from Control Entities.

Bank secrecy is not enforceable against requests for information specifically formulated by authorities within the framework of investigations within their jurisdiction.

Requests from the Colombian Financial Superintendency, the Financial Information and Analysis Unit (UIAF), the Attorney General's Office, or any other competent authority must be met promptly and diligently, without withholding or concealing information. Orders to seize or freeze funds received through official communications issued by the competent authorities (judges, magistrates, specialized prosecutors, the Special Assets Society or its representative) must be complied with promptly.

7.3 Training

Employees must possess a high level of training and professionalism in the conduct of their operations. Each employee is responsible for staying up-to-date with the organization's internal documentation and circulars, as well as those issued by entities that regulate financial and foreign exchange activities, as well as taking the courses required by the Financial Superintendency and market self-regulators, and those the Bank deems mandatory.

Employees must take advantage of all training opportunities provided by Banco de Occidente, making the best use of them. They must also be familiar with the regulations governing their profession or trade and the standards inherent to their position within the organization.

Attendance and response to these training sessions are mandatory for all Bank employees.

7.4 Sanctions

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Failure to comply with the rules, policies, and procedures related to bank reserves will result in administrative and/or disciplinary sanctions. Under this assumption, the aforementioned noncompliance will be considered a serious offense pursuant to Section 6 of Section a) of Article 62 of the CST, a provision substituted by Article 7 of Decree 2351 of 1965, and therefore will authorize the employer to terminate the employment contract for just cause.

8. Conflicts of Interest

Conflicts of interest arise when a manager or employee of the organization, acting on their own behalf or on behalf of another (a representative of a natural or legal person), is directly or indirectly involved in a conflict situation in the performance of their duties for reasons other than the proper fulfillment of their responsibilities, affecting impartiality, because their personal interests prevail over the interests of the organization and their labor and social obligations.



In order to avoid any situation that may involve a conflict of interest, Bank executives and employees who find themselves facing a conflict of interest or consider they may be facing one must promptly inform the organization and act equitably, providing their contracted services without expecting compensation other than that agreed upon in the contractual or employment relationship, without considering personal or third-party benefits.

This section covers transactions determined by the National Government and those entered into by the Bank with its shareholders, its directors, or their spouses and relatives within the second degree of consanguinity or affinity, or the sole civil degree, which must be concluded with the unanimous vote of the members attending the Board of Directors meeting. In the event that a conflict of interest arises with one of the Bank's directors, only the votes of the other members will be taken into account. Any conflicts of interest that may arise will be resolved through the application of the mechanisms established in this Code.

Transactions may not include conditions other than those generally used by the Bank with the public, depending on the type of transaction, except for those carried out to address health, education, housing, and transportation needs in accordance with regulations issued by the Board of Directors in general.

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In dealing with clients, users, suppliers, or contractors, all employees must act in the best interest of Banco de Occidente, excluding any personal gain.

Credit operations or the management of products and services related to: a) first- or second-degree blood relatives, first-degree affinity relatives, or sole civil relatives of the employee; b) companies owned by the employee or in which the employee has any shareholding; c) companies owned by first- or second-degree blood relatives, first-degree affinity relatives, or sole civil relatives of the employee; the employee must not have direct or indirect involvement in the approval process. In all cases, current procedures and controls must be followed. If the employee is part of the approving body and has no one to replace them, approval must be requested from their superior or designated (ad hoc).

There are no restrictions on the provision of services to these clients by employees for non-credit products and services, provided that current procedures and controls are followed.

There should be no improper use of the benefits that Banco de Occidente grants exclusively to its employees.

No discounts, exemptions, or exceptional compensation of any kind should be granted for reasons of friendship or kinship without prior approval from the Board of Directors or a qualified executive of the organization.

The decisions made by employees must be subject to the criteria and guidelines provided by the Bank, and to the proper performance of their duties. Their behavior should under no circumstances be influenced by gifts, courtesies, or invitations they may receive in the course of their duties.

8.1 Relationship with Clients

Customer services are permitted as long as they are strictly commercial in nature, correspond to commercial gifts approved by the Bank and include its logo, occur occasionally, and the costs involved are commensurate with the activity performed.

8.2 Relationship with Suppliers

Compliance with the Bank's established policies and procedures for the selection and hiring of suppliers and contractors is mandatory.

Relationships established with suppliers must be based on trust and transparency, fully adhering to the guiding principles and values established in this code.

8.3 Personal relationships with market participants

Front Office employees who report personal relationships with individuals linked to other financial institutions, brokers, etc., with whom they share physical space in the development of the teleworking contractual modality, must annually certify that they are aware of and accept the risks and responsibilities regarding conflicts of interest and confidentiality of information, on the part of the individuals to whom it applies.



8.4 Gifts and Entertainment Activities

Managers and employees must refrain from accepting and/or giving gifts and invitations that could compromise their professional independence and the organization's responsibility.

As established by Banco de Occidente's Corporate Anti-Fraud and Anti-Corruption Policy and the Conflict of Interest Policy, employees are prohibited from soliciting, receiving, granting or promising, as a gratuity or gift, money, bonuses, fees, commissions, advances, travel expenses, checks, debit cards, entertainment, securities or any other document that can be converted into money, as well as any other thing of value from a third party with which Banco de Occidente does business.

In accordance with the above, it is common in business relationships to give and receive gifts and invitations. However, this practice can be misused to access favors and advantages. Therefore, understanding that this practice is part of the ordinary course of business relationships, the conditions applicable to employees regarding the giving and receiving of gifts and invitations are established below.

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Granting Gifts and Invitations

Employees are prohibited from granting or promising, on behalf of the Bank or on their own behalf with the Bank's resources or with their own resources acting on behalf of the Bank, money or any other cash equivalent, such as bonds, checks, debit or credit cards, securities and/or securities.

Without prejudice to the foregoing, subject to the necessary levels of authority and/or authorizations, collaborators are permitted to make gifts and invitations, provided they meet the following conditions:

- Gifts must correspond to promotional items representative of the corporate image of Banco de Occidente and/or its Subsidiaries.
- Invitations must correspond to activities that are part of the ordinary course of business for the promotion or offering of products or services, in accordance with the Bank's corporate purpose.
- Payment of travel expenses to third parties is prohibited.
- The granting of gifts and invitations must be within the framework of legitimate purposes, and their granting for the purpose of obtaining an undue or illegal advantage as compensation is prohibited.

Receiving Gifts and Invitations

Employees are prohibited from soliciting gifts and invitations, directly or indirectly, implicitly or explicitly. However, employees may receive gifts and invitations provided the following conditions are met:

- They cannot be in cash, that is, they cannot receive cash, checks, debit cards, securities, or any other document that can be converted into money.
- The gift or invitation may not exceed 5% of the monthly salary of the employee who receives it and said amount may not exceed two (2) current legal monthly minimum wages (SMMLV), cumulative during a current year; and may not be received more than once in the same quarter from the same third party and may not be granted during or within three (3) months following the negotiation with the third party.
- In the case of invitations, they must correspond to events related to the ordinary course of business, with the offering and/or demonstration of products or services or invitations to events for academic or training purposes.
- Under no circumstances may receiving the gift or attention have the capacity to improperly or illegally influence the employee's conduct.

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It is understood that gifts or invitations that do not meet the aforementioned conditions may not be received. However, gifts or invitations that have been given or received in violation of these parameters must be reported to the Vice President of the respective area, or the Manager, if applicable, and to the Anti-Corruption Leader, who must decide whether to authorize receiving or delivering the gift or invitation. Vice Presidents or those whose hierarchical superior is the President of the Bank must consult with the latter. The President must consult with the Board of Directors.

The rules on gifts and entertainment apply year-round, including holidays, and apply not only to employees but also to their spouses or relatives up to the second degree of consanguinity.



8.5 Solution Mechanisms

When conflicts of interest arise, the following mechanisms are defined for their resolution:

8.5.1 At the Management Level

The solution to the conflict will be addressed by the Presidency.

As a general rule, when in doubt about whether a conflict of interest exists, you should consult with your superior about whether you should submit to the formal procedure detailed above.

8.5.2 At the Collaborator Level

The case will be presented to the Human Resources Department of each Zone, the Human Resources Department in Bogotá, and the Labor Relations Department in the General Directorate, where any potential conflict of interest will be assessed.

When the case warrants it, it will be submitted for consideration by the National Operating Committee, which is composed of: Vice President of Human and Administrative Talent, Labor Relations Manager, Banking and Information Security Manager, and Process Manager.

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9. Treasury Operations

Regardless of the mandatory nature of other policies enshrined in this Code, Treasury employees must adhere to ethical and good-faith professional standards, always disregarding personal considerations, preventing and controlling risks, and complying with the policies, procedures, controls, and security measures defined for Treasury business.

All operations carried out by the Treasury will be subject to the quotas, limits, and powers established for each counterparty, operation, and collaborator. Any operation that exceeds the quota, limit, and conferred power must be authorized by the relevant authority prior to execution. Treasury collaborators are responsible for ensuring compliance with their own limits and powers, as well as those they have delegated.

Treasury employees, by virtue of the law and in the best interests of clients and market integrity, are obligated to strictly adhere to the following basic principles of stock market activity.

9.1 Principles¹

Transparency

Provide accurate, sufficient, clear, and timely information about the products it promotes and the operations it carries out in the development of its corporate purpose.

Confidentiality

Avoid disclosing private information related to the market.

Appropriate use of information

All participants must avoid using privileged information for their own benefit or that of third parties.

Loyalty

It is understood as the obligation of participants to act with honesty, frankness, fidelity and objectivity with respect to all market participants.

Professionalism

Securities market intermediaries must always provide their clients with information based on "serious, complete, and objective" information and take their needs into account.

Respect for the Law

Act in accordance with legal provisions, especially the obligations to provide information contained therein, informing the client of any circumstances that may modify their contractual intentions.

Rumors

Bank employees will refrain, at all times, from generating or transmitting market rumors or comments based on any type of information.

¹ Extracted from the AMV Study Guide – Ethics and Integrity



Insider Information

No contract or transaction should be negotiated on the basis of non-public information, in accordance with relevant laws or concerning insider trading or price transparency.

Honesty

Treasury employees, their spouses, or financially dependent individuals must report transactions with restricted entities, whether financial interests, contractual, employment, advisory, or counseling relationships, loan applications or grants, or special business conditions.

Favoriting clients, third parties, or other areas of the Bank in order to take advantage of potential business benefits is prohibited.

No Treasury employee may use the organization's name to carry out activities or execute transactions for which they are not authorized. Likewise, when the Bank's name is used for authorized activities or transactions, it must be done professionally, avoiding compromising the Bank's financial stability or jeopardizing its image and credibility.

9.2 Intermediation

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All intermediation activities must be conducted prudently based on the criteria, laws, and stipulations contained in the Bank's policies and procedures.

9.3 Operations

Treasury employees should only participate in transactions they deem prudent under current market conditions, keeping their word in all negotiations, both in the market and internally.

In accordance with the above, it is the duty of the members of the Treasury:

- Rectify and adjust incorrect quotes that have been made by any professional counterparty in the market.
- Immediately and obligatorily report to the Management and Senior Management level that it deems necessary, any irregularity that is suspected to be being committed by others.
- Refrain from carrying out Treasury Operations without having the respective certification for the type of operation in force.

9.4 Customer Management

Treasury members in charge of client management must:

- Generate trust among your clients through performance transparent, impartial and in good faith, without putting personal interests first.
- Provide clients with all available, suitable and truthful information that is important for making fundamental decisions, without violating confidentiality, banking secrecy, and personal data protection.
- Ensure that clients understand the nature of the transactions they enter into, as well as the risks involved. • Inform clients of the service collection policies, as well as any expenses involved in the transactions they enter into.

9.5 Regulatory Update

To properly perform their duties and meet the highest standards, Treasury employees must promptly review the regulations, circulars, policies, and other documents issued by the oversight and supervision bodies of the financial system and the securities market.

10. Communication Channels

10.1 Ethics Line

Being ethical is everyone's responsibility. The Ethics Line is a mechanism established by the organization that allows the Bank's employees, clients, suppliers, and contractors to anonymously report malicious behavior that threatens people, assets, any of the principles or policies established in this code, and the Bank's integrity in general. Its main objective is to prevent, stop, and mitigate risk events arising from irregular practices and situations that compromise the Bank's good name, ensuring the confidentiality of the information provided and protecting the identity of the person making the report.



The timely identification and resolution of these situations is vital to maintaining the Bank's strong relationships with its customers, employees, and shareholders.

The information provided for the investigation is treated with the utmost confidentiality, in accordance with applicable law and regulations.

All Banco de Occidente employees, regardless of position, role, and/or responsibility, are required to report any suspicion or evidence of malicious conduct.

Investigations will be conducted in accordance with applicable regulations, respecting the principle of good faith, due process, and other legal and constitutional guarantees. Likewise, all Banco de Occidente employees must cooperate in any investigations if requested by those in charge.

You can contact the Banco de Occidente Ethics Line through the following route: Banco de Occidente Website / Institutional / Ethics Line - <https://www.bancodeoccidente.com.co/wps/portal/banco-de-occidente/bancodeoccidente/footer/otros/linea-etica>

10.2 External Communications

The Brand and Relationships area of the Vice Presidency of Corporate Banking is the only area within the Bank authorized to make public statements on behalf of the Bank.

If a contributor is contacted by a member of the media, they should refer the person to this area and refrain from commenting and/or providing clarifications.

No information may be published or announced in writing or electronic format, no speech may be given, no interview may be granted, or no public appearance may be made in which Banco de Occidente, its operations, clients, products, or services are mentioned without prior authorization from the Brand and Relationship areas of the Vice Presidency of Corporate Banking, who in turn must inform the President or, failing that, the Legal Vice President, should their intervention be required, as the only collaborators authorized to handle public statements.

In the case of advertising elements, these will be the responsibility of each Management or the Brand and Relationships area of the Vice Presidency of Corporate Banking, who will request prior approval from their respective Vice Presidency or, failing that, from the President.

10.3 Social Networks

The participation of collaborators through social networks such as Facebook, X, TikTok, Instagram, YouTube, among others, will be done on a strictly personal basis.

No Banco de Occidente employee is authorized to respond to comments, complaints, questions, acknowledgements, or attacks made by other users on the Bank's social media profiles. The Community Manager is the sole official spokesperson for Banco de Occidente on these channels.

If employees have personal and/or group, private and/or public accounts or websites on any social network, they may only publish textual or graphic content that mentions and compromises the image and reputation of Banco de Occidente when they are endorsed and/or authorized by the Bank, either through its leaders, the Brand and Relations areas of the Vice Presidency of Corporate Banking and the Brand and Advertising areas of the Vice Presidency of Personal Banking and/or the Presidency.

Bank employees are prohibited from making disparaging comments or comments that undermine the Bank's reputation, shareholders, colleagues, clients, or superiors through social media.

All employees agree to comply with the guidelines issued by the Bank regarding the use of social media and advertising materials.

Bank employees must comply with the policies and procedures defined internally regarding information management and security.



11. Sanctioning Regime

Speaking of sanctions implies the possibility of actions that go against what are normally considered ethical limits or that are against legal restrictions and that obey irresponsible, permissive, negligent, inefficient or omissive attitudes in the commercial and operational development of the organization, which entails a series of sanctions for the responsible managers and collaborators that will be imposed by State agencies or by the organization itself, as the case may be.

Operations carried out with clients must be regulated and controlled, with the objective that the Bank is not used as an instrument for concealing, managing, investing or exploiting in any way, money or other assets derived from criminal activities, or to give the appearance of legality to illicit activities or transactions or funds linked to them.

11.1 State Administrative Sanctions

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These are those applied by the Colombian Financial Superintendency or any other competent state body on a personal basis to directors or employees when they authorize or carry out acts that violate the Statutes or any law, regulation, or any legal standard to which the Bank must adhere.

These sanctions may be:

Admonition

It is a written warning, addressed directly to the person being warned, with a copy to the Bank's Legal Representative, stating the non-compliance and warning that if the anomaly persists, the penalty may be more severe.

Financial Sanction

The Financial Superintendent may also impose economic sanctions. The fines are scalable annually starting in 2003, according to the CPI (Consumer Price Index) provided by DANE (National Agency for the Promotion of Financial Conduct). They may be successive as long as the noncompliance persists and will be applied regardless of the existence of a punishable offense (Article 209 of the Organic Statute of the Financial System).

Suspension or Disability from Financial Work

The Financial Superintendent may disqualify the performance of positions that require possession before the Superintendency for up to a period of five (5) years.

Dismissal

If the violation is of such magnitude, the Financial Superintendent, through a reasoned resolution, may request the Bank's Board of Directors or Legal Representative, as the case may be, to immediately dismiss the executive or employee. In this case, the Labor Relations Department must cancel the respective employment contract.

11.2 Termination of Employment Contract

If the employee's actions go against the legal or internal regulations previously referenced, for example, if banking confidentiality is violated or money from illegal activities is concealed and given the appearance of legality (non-compliance with SARLAFT), it will be considered a serious offense in accordance with section 6) of literal a) of article 62 of the CST, a rule substituted by article 7 of Decree 2351 of 1965 and, therefore, will authorize the employer to terminate the employment contract with just cause. This measure is in accordance with the provisions of the introduction to this code and for the reasons set out below.

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they expose:

External Character Reasons

When the Financial Superintendent demands the immediate removal of a manager or employee who violates a legal norm or internal regulation, the Human Resources Departments of each Zone, the Bogotá Human Resources Management Office, and the DG Labor Relations Management Office must terminate the employment contract with just cause, a measure taken in accordance with the Substantive Labor Code.

Internal Reasons

When a Bank employee has violated the provisions contained in this Code, internal regulations, applicable regulations issued by a supervisory body, or the acts or omissions referred to in the legal provisions mentioned in the SARLAFT Manual, or the acts or omissions that modify or add to such regulations."



11.3 Civil Liability Actions

If an employee acts negligently or omits to perform his or her duties and, through his or her actions, harms the organization or a natural or legal person, whether a client of the Bank or not, he or she shall be held civilly liable for any economic or moral losses suffered as a result of the violations committed. This rule is enshrined in Article 210 of the Organic Statute of the Financial System.

11.4 Criminal Sanctions

Without prejudice to any action taken by the Financial Superintendent or the organization, the employee may be subject to criminal prosecution if his or her actions violate criminal law, particularly in the following respects:

Private Corruption

Article 250A of the Penal Code: Whoever directly or through an intermediary promises, offers or grants to directors, administrators, employees or advisors of a company, association or foundation a gift or any unjustified benefit to benefit himself or a third party, to the detriment of the former, shall incur imprisonment of four (4) to eight (8) years and a fine of ten (10) to one thousand (1,000) current legal monthly minimum wages.

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Unfair administration

Article 250B of the Penal Code: The administrator, de facto or de jure, or partner of any company, whether established or in formation, director, employee or advisor, who for his own benefit or that of a third party, abusing the functions inherent to his position, fraudulently disposes of the company's assets or incurs obligations on behalf of the company, directly causing an economically assessable loss to its partners, will incur imprisonment of four (4) to eight (8) years and a fine of ten (10) to one thousand (1,000) current legal monthly minimum wages.

Transnational Bribery

Article 433 of the Penal Code: Whoever gives, promises or offers to a foreign public servant, for the benefit of the latter or a third party, directly or indirectly, sums of money, any object of pecuniary value or other benefit or utility in exchange for the latter performing, omitting or delaying any act related to the exercise of his functions and in relation to an international business or transaction, shall incur imprisonment of nine (9) to fifteen (15) years, disqualification from the exercise of public rights and functions for the same term and a fine of six hundred and fifty (650) to fifty thousand (50,000) current legal monthly minimum wages.

Improper Use of Privileged Information

Article 258 of the Penal Code: Anyone who, as an advisor, director or member of a board or administrative body of any private entity, in order to obtain profit for himself or a third party, makes improper use of information that he has learned by reason or on the occasion of his position or function and that is not public knowledge, will incur a prison sentence of one (1) to three (3) years and a fine of five (5) to fifty (50) current legal monthly minimum wages.

The same penalty shall apply to anyone who uses information known by reason of their profession or occupation to obtain profit for themselves or a third party through the negotiation of a certain share, security or instrument registered in the National Securities Registry, provided that said information is not public knowledge.

Massive and Regular Collection of Money

Article 316 of the Penal Code: Anyone who develops, promotes, sponsors, induces, finances, collaborates, or carries out any other act to raise money from the public in a massive and habitual manner without prior authorization from the competent authority, will incur imprisonment of one hundred twenty (120) to two hundred forty (240) months and a fine of up to fifty thousand (50,000) current legal monthly minimum wages.

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If the agent uses social media or other mass media for such purposes, the penalty will be increased by up to a quarter.

Money Laundering

Article 323 of the Penal Code: Whoever acquires, safeguards, invests, transports, transforms, stores, conserves, guards or manages assets that have their mediate or immediate origin in activities of migrant trafficking, human trafficking, extortion, illicit enrichment, extortionate kidnapping, rebellion, arms trafficking, trafficking of minors, financing of terrorism and administration of resources related to terrorist activities, trafficking of toxic drugs, narcotics or psychotropic substances, crimes against the financial system, crimes against public administration, or linked to the proceeds of crimes committed under conspiracy to commit a crime, or gives the assets from such activities an appearance of legality or legalizes, hides or conceals the true nature, origin, location, destination, movement or right over such assets or performs any other act to hide or conceal their illicit origin, will incur for that conduct alone, imprisonment of ten (10) to thirty (30) years and a fine of six hundred and fifty (650) to fifty thousand (50,000) current legal minimum wages.



The same penalty shall apply when the conduct described in the previous paragraph is carried out on property whose forfeiture of ownership has been declared.

Money laundering will be punishable even if the activities from which the assets originate, or the acts penalized in the preceding sections, were carried out, in whole or in part, abroad.

The custodial sentences provided for in this article shall be increased by one-third to one-half when the conduct involves exchange or foreign trade transactions, or the introduction of goods into national territory.

The increased penalty provided for in the previous section will also apply when contraband goods are introduced into the national territory.

Omission of Control

Article 325 of the Penal Code: Any member of the Board of Directors, Legal Representative, administrator or employee of a financial institution or cooperative that carries out savings and credit activities who, in order to hide or cover up the illicit origin of the money, fails to comply with any or all of the control mechanisms established by the legal system for cash transactions will incur, for that conduct alone, imprisonment of thirty-eight (38) to one hundred twenty-eight (128) months and a fine of one hundred thirty-three point thirty-three (133.33) to fifteen thousand (15,000) current legal monthly minimum wages.

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Front man

Article 326 of the Penal Code: Whoever lends his name to acquire property with money from the crime of drug trafficking and related crimes, will incur imprisonment of ninety-six (96) to two hundred seventy (270) months and a fine of six hundred sixty-six point sixty-six (666.66) to fifty thousand (50,000) current legal monthly minimum wages, without prejudice to the confiscation of the respective assets.

The same penalty will be imposed when the conduct described in the previous paragraph is carried out with money from extortionate kidnapping, extortion and related activities and the fine will be six thousand six hundred sixty-six point sixty-six (6,666.66) to fifty thousand (50,000) current legal monthly minimum wages, without prejudice to the confiscation of the respective assets.

Illicit Enrichment of Individuals

Article 327 of the Penal Code: Whoever, directly or through an intermediary, obtains, for himself or another, an unjustified increase in assets derived from one form or another of criminal activities, shall incur, for that conduct alone, imprisonment of ninety-six (96) to one hundred and eighty (180) months and a fine corresponding to double the value of the illicit increase obtained, without exceeding the equivalent of fifty thousand (50,000) current legal monthly minimum wages.

Favoring

Article 446 of the Penal Code: Anyone who has knowledge of the commission of punishable conduct, and without prior agreement, helps to evade the action of the authority or to hinder the corresponding investigation, will incur imprisonment from sixteen (16) to seventy-two (72) months.

If the conduct is carried out in relation to the crimes of genocide, forced disappearance, torture, forced displacement, homicide, extortion, illicit enrichment, extortionate kidnapping, drug trafficking, narcotics or psychotropic substances, the penalty will be sixty-four (64) to two hundred and sixteen (216) months in prison.

If it is a violation, a fine will be imposed.

Crimes associated with FCPA

Anyone who gives or offers money or other benefits to a public servant will incur the following crimes, as the case may be:

■ A National Public Official: Will incur the crime of Bribery by giving or offering, in accordance with the Colombian Penal Code, Title XV Crimes against public administration, Chapter Three, Art. 407.

■ A Foreign Public Official: Will incur in the crime of Transnational Bribery, in accordance with the Colombian Penal Code, Title XV Crimes against public administration, Chapter Eleven, Art. 433.

Extortion

Article 355 of the Penal Code: Anyone who forces another to do, tolerate or omit something, with the purpose of obtaining illicit profit for himself or for a third party, will incur imprisonment from four (4) to twenty (20) years.



Glossary

Back Office: Accounting Record Area for Treasury Operations.

Clients: These are natural or legal persons with whom a legal or contractual relationship is established and/or maintained for the supply of any product related to their activity or for the provision of any service.

Non-banking correspondents: These are natural or legal persons who, through a concession contract, offer banking services to the community in general, which for various reasons the Bank cannot provide directly.

DANE: National Administrative Department of Statistics.

Directors: The members of the Honorable Board are thus determined.
Board of Directors of the Bank of the West.

EOSF: Organic Statute of the Financial System.

Employee/Collaborators: Other persons with employment ties to Banco de Occidente, responsible for implementing and monitoring the policies, rules, and procedures mandated by law, the Statutes, or by the organization's directors.

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Front Office: Treasury Business Area.

CPI: Consumer Price Index.

LA/FT: Money Laundering/Terrorism Financing.

LA/FT/FPADM: Risk of Money Laundering and Financing of Terrorism and the Proliferation of Weapons of Mass Destruction.

Middle Office: Treasury Risk Assessment Area.

OFAC: Office of Foreign Assets Control of the U.S. Department of the Treasury

UN: United Nations Organization.

FIFOs: Publicly Exposed Persons.

Suppliers: These are natural or legal persons who, through a contract, provide their services to the Bank to supply goods or products for the proper development of the organizational activity.

SAES: Special Administrative Services.

SARLAFT: Money Laundering and Terrorism Financing Risk Management System.

STAFF: Support.

Outsourcing: These are natural or legal persons who, through the execution of a contract, provide their services and knowledge to perform specific work in the commercial, administrative, or operational areas of the Bank.

UIAF: Special Unit for Financial Information and Analysis.

Users: These are natural or legal persons who, for their own benefit or in favor of or on behalf of a client, occasionally use the services that the organization offers to its clients and the community in general.



Declaration of Compliance Code of Ethics and Conduct

I, _____ identified with the
citizenship card number _____, I declare that I
know and understand the content of the Bank's Code of Ethics and Conduct,
which clearly establishes the parameters of behavior that must be followed
as an employee of this organization.

Taking into account the above, I undertake to comply with the entire contents
of this document and to strictly follow the patterns of behavior stipulated
therein, taking into account that this Code constitutes an integral part of the
employment contract signed with the Bank and the violation of any of its
provisions constitutes a serious offense in accordance with the Law and the
provisions of the Substantive Labor Code.

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In constancy

Signature:

Name:

Code:

Date:

Note: A copy of this document will go in your resume folder. Failure to comply with any of the
rules will subject you to the established penalties.

Last Updated: September 2024



► BancodeOccidente.com.co

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