INTERNAL REGULATIONS OF THE BOARD OF DIRECTORS OF BANCO DE OCCIDENTE

TITULO I. PRELIMINARY CONSIDERATIONS

ARTICLE 1.01.- PURPOSE.

The purpose of these Regulations is to set forth the principles, rules and procedures of action and functions of the Board of Directors and its committees of BANCO DE OCCIDENTE, hereinafter the BANK, to and functions of the Board of Directors and its committees of BANCO DE OCCIDENTE, hereinafter the BANK, regulate its organization and operation, and establish the rules of conduct of its members, all in accordance with the provisions of the Law, the Bylaws and the Code of Good Governance, in order to facilitate the management of the Members of the Board of Directors in an environment of transparency, efficiency and certainty in their actions.

ARTICLE 1.02.- SCOPE OF APPLICATION

The Regulations shall be applicable to the Members of the Board of Directors, as well as to the officers of the BANK who participate in the meetings of the Board of Directors, who have the obligation to know, comply with and enforce compliance with these Regulations.

In the events in which it is applicable and deemed necessary, the Board of Directors shall develop its functions through general policies, guidelines or requests for information, seeking a balance between the interests of the Company and those of its subordinate entities, as a whole. The foregoing is without prejudice to the autonomy of the governing bodies of the Company's subordinate entities and the responsibility of the members of their senior management and administrators with respect to the ordinary course of their business**.**

TITLE II. OBJECTIVES, FUNCTIONS AND PRINCIPLES OF ACTION OF THE BOARD OF DIRECTORS

ARTICLE 2.01.- OBJECTIVES OF THE BOARD OF DIRECTORS

The purpose of the Board of Directors is to exercise the administration of the BANK, in all matters that are not of exclusive disposition of the GENERAL ASSEMBLY OF SHAREHOLDERS, and especially:

1) To direct the policy of the BANK, complying with the legal and regulatory provisions governing the matter.

2) To ensure respect for the rights of its shareholders and other investors in accordance with the parameters established by the market regulatory bodies.

3) To ensure respect for the rights of those who invest in its shares or in any other securities issued, the proper administration of its affairs and the public knowledge of its management.

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4)To comply with and enforce compliance with the legal, regulatory, statutory and internal rules applicable to the BANK and to the business, operations and activities carried out by the BANK.

5)To seek the effectiveness and efficiency of the operations and compliance with the basic objectives of the entity, safeguarding its resources, including its own assets, and the property of third parties held by the Entity.

ARTICLE 2.02.- FUNCTIONS OF THE BOARD OF DIRECTORS

In accordance with the Law, the Bylaws and the Corporate Governance Code, among others, the functions of the Board of Directors are as follows:

1) To freely appoint and remove the President of the BANK, the Vice Presidents, the General Secretary, the Branch Managers and to fix their assignments.
2) Establish and suppress, prior compliance with the legal requirements, the Branches and Agencies it deems convenient. The Bank's Management shall make the necessary recommendations to the Board of Directors.
3) To establish the administrative structure of the BANK, determining its personnel, functions and assignments. The Bank's Management shall make the necessary recommendations to the Board of Directors.
4) Present to the General Shareholders' Meeting, in association with the BANK's President, the reports and balance sheets for each fiscal year and the projects for the distribution of profits, accompanied by a report on the progress of the business and general situation of the entity, including a description of the BANK's main risks, internal control activities, as well as relevant findings. Said report shall be available to investors and shareholders in accordance with the mechanisms established in the Code of Good Governance.
5) Authorize increases in subscribed capital, issue regulations for the issuance and placement of shares, in accordance with legal provisions.
6) Appoint, when it deems it convenient, advisory or consultative boards for the Bank's Branches, setting their attributions and remunerations.
7) To form Committees or Commissions formed by two or more of its Members for the study and decision of certain matters.
8) To create one or more committees, composed of the number of members it determines and designates, which shall be renewed periodically and to which it may delegate one or more of the powers that are not exclusive to it or to another body of the Administration, in accordance with the Law.
9) To clarify the meaning of the Articles of the Bylaws, the Code of Good Governance, when any doubt arises.
10) To issue its own rules of procedure.
11) To adopt specific measures regarding the governance of the corporation, its conduct and information.
12) To ensure respect for the rights of all its shareholders, investors, depositors and suppliers.
13) Approve a Code of Good Governance that will contain all the rules, policies and mechanisms required by law, regulations, the General Assembly of Shareholders, the bylaws, and in general the best practices of good corporate governance.
14) Authorize the issuance of bonds.
15) To ensure due compliance with internal control policies and procedures.

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16) Resolve conflicts of interest that arise between shareholders and directors, managers or senior officers and between controlling shareholders and minority shareholders. When the conflict of interest involves a member of the Board of Directors, it shall be resolved without taking into account the vote of the affected party. The Company's Code of Good Governance establishes the procedures for resolving conflicts of interest. Exceptions to the foregoing are those conflicts that arise due to any activity by an administrator of the Bank, whose development implies competition with the corporation or any act with respect to which there is a conflict of interest, which must be authorized or resolved by the General Shareholders' Meeting. For such purpose, the director shall provide the Meeting with all the information that is relevant for the decision to be made. The vote of the administrator, if he/she is a member, must be excluded from the respective determination. In any case, the authorization of the General Assembly of Shareholders may only be granted when the act does not harm the interests of the corporation.
17) To authorize or not the proceeding of specialized audits when so requested by shareholders representing at least ten percent (10%) of the outstanding shares of the Bank and/or investors owning at least twenty percent (20%) of the total outstanding commercial securities issued by the Bank, at the time of the request.
18) The Board of Directors and Senior Management of the Entity, regardless of their other responsibilities, must execute all actions within their reach in order to seek the adequate organization, monitoring and follow-up of treasury activities. These responsibilities include the establishment of risk limit policies in these activities, as well as the approval of the policies, strategies and rules of action of the Entity in this field, under the terms indicated in the Code of Good Corporate Governance.
19) The Board of Directors shall analyze new products, their implications on risk management and the impact on equity. The participation in new markets and the negotiation of new products must be authorized by the competent authorities of the organization.
20) Exercise, in accordance with the Law, all the functions it deems necessary for the development of the Bank's corporate purpose, which are not contemplated in the Bylaws or in the Code of Good Governance.
21) The President of the Board of Directors may prepare, jointly with the President of the Bank, the Agenda of the General Shareholders' Meeting. Annex C
22) In the event that the Board of Directors receives a proposal from a shareholder or group of shareholders representing at least 5% of the capital stock, in order to include one or more items in the Agenda of the General Shareholders' Meeting, the Board of Directors may evaluate whether or not the request is appropriate. If it deems it convenient, it may include it in the Agenda of the Meeting, for which purpose the Agenda shall be updated on the Web Page. In the event that the request is not approved, the Board of Directors may justify in writing the decision that gave rise to the rejection of the request. In any case, the shareholders' proposal must be submitted to the Board of Directors within 5 common days following the publication of the notice of meeting.
23) In the event of a request by a Shareholder or Senior Management for a Segregation process (Improper Spin-off) involving the Bank, the President of the Board of Directors or, in the absence of such request, any of the Directors, together with the President of the Company, may include it as a separate item in the Notice of the General Shareholders' Meeting.

PARAGRAPH FIRST. At a general level, the Board of Directors may concentrate its activity on the general functions of strategy, supervision, governance and control, in order to confirm the due compliance

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PARAGRAPH SECOND In the event that there are qualifications and/or paragraphs of emphasis by the Statutory Auditor, the Board of Directors may maintain its criterion, for which it must explain and justify through a written report to the General Shareholders' Meeting.

PARAGRAPH THIRD. In the event of transactions that may result in a dilution of the capital of minority shareholders, the Board of Directors shall evaluate the need to hire an external opinion (fairness opinion) to analyze and assess the terms of the transaction and may submit the respective report to the consideration of the shareholders' meeting. Said opinion shall guarantee the right of inspection.

ARTICLE 2.03.- DUTIES OF THE BOARD OF DIRECTORS WITH RESPECT TO TRANSACTIONS WITH PARTNERS OR DIRECTORS

In matters of transactions between Members of the Board of Directors and partners or administrators, the Board of Directors shall have the following functions:

1) The members of the Board of Directors must refrain from granting, in contravention of legal or statutory provisions, credits or discounts to shareholders, or persons related to them, under conditions that may endanger the solvency or liquidity of the institution.
2) The Board of Directors shall approve with the unanimous vote of the members of the Board of Directors attending the respective meeting, the authorized transactions determined by the National Government and entered into by the BANK with its shareholders owning five percent (5%) or more of the subscribed capital, with its administrators, as well as those entered into with their spouses and relatives of its partners and administrators within the second degree of consanguinity or affinity, or sole civil relationship, in accordance with article 122 of the Financial System Organic Statute, and the rules that add, modify or repeal it. In the minutes of the meeting in which the approval is made, there shall also be evidence of having verified compliance with the rules on limits to the granting of credit or maximum debt or risk concentration quotas in force on the date of approval of the operation.

ARTICLE 2.04.- PRINCIPLES FOR ACTION

The Board of Directors shall always act independently from the Management, and in accordance with the general principles and instructions given by the General Shareholders' Meeting to the Directors. Without prejudice to the other obligations established in the regulations in force, the members of the Board of Directors shall act in good faith, under criteria of diligence and care with their decisions and acts, with loyalty; keeping the respective prudence and confidentiality, and avoiding the use of corporate assets except in the performance of their duties as member(s) of the Board of Directors, as well as refraining from engaging in conducts that imply competition or conflict of interest with the Bank without due authorization.

For their part, the members of the Board of Directors shall have the right to: be duly informed for their decision making; propose the collaboration and support of experts if necessary; be remunerated in accordance with the decision of the Shareholders' Meeting; as well as to receive training when deemed pertinent and the need for the complexity of the issues so warrants.

The members of the Board of Directors shall be liable before the Company, the shareholders and third parties under the terms established by law.

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PARAGRAPH: The information provided by the Bank's officers to the Board of Directors and/or Senior Management must be truthful, understandable and complete.

TITLE III. COMPOSITION OF THE BOARD OF

DIRECTORS

ARTICLE 3.01.- CONFORMATION AND PERIOD

In accordance, among others, with Law 964 of 2005, Decree 3923 of 2006, the Bylaws and the Code of Good Governance, and other regulations that modify, complement or repeal them, the composition of the Board of Good Governance Code, and other regulations that modify, complement or repeal them, the composition of the Board of Directors, and the determination of its term shall be in accordance with the following conditions:

1) The Board of Directors shall be composed of nine (9) principal directors.
2) The General Assembly shall freely elect and remove the members of the Board of Directors for periods of one (1) year.
3) For the purpose of electing the members of the Board of Directors, the electoral quotient system shall be applied.
4) The designation as member of the Board of Directors shall be in a personal capacity.
5) The Board of Directors must have at least 25% of its members as independent.

According to their origin, the Members of the Board of Directors may be classified as follows:

a) Independent Members: They are those who meet the requirements of Law to be considered as independent.

b) Non-Independent Members: Are those who do not comply with the requirements established in the applicable Law to be considered as Independent. In turn, these members of the Board of Directors may be classified as: a) Equity Members: Non-Independent members who are shareholders of the Company or who have been expressly nominated by a legal entity or natural person shareholder or group of shareholders to be members of the Board of Directors. b) Executive Members: Non-Independent members who are legal representatives of the Company or are part of the senior management thereof.

PARAGRAPH: The Society recognizes the value of having a diverse Board of Directors, that is, people with different knowledge, experiences, perspectives, beliefs, gender, ethnicity, political preference, professional and personal skills that promote analysis and enrich discussions with different points of view for decision making.

In the event of vacancies or appointment needs, the Board of Directors will eventually inform the Shareholders of the profiles deemed necessary for the composition of this Board of Directors, taking into account the aforementioned criteria.

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ARTICLE 3.02.- GENERAL QUALIFICATIONS FOR BOARD MEMBERSHIP

The Board of Directors may not be composed of a majority of persons related to each other by marriage, or by kinship within the third degree of consanguinity or second degree of affinity or first civil relationship.

Neither may they be members of the Board of Directors:

1) Persons who hold any position or are Legal Representatives of the BANK.
2) Persons who sit on the boards of directors of other credit institutions, except for the exceptions established by law.
3) Persons who, in accordance with the regulations governing the banking activity, have any impediment.

ARTICLE 3.03.- SPECIAL CONDITIONS FOR INDEPENDENT MEMBERSHIP

Independent Members shall be all those persons determined as such by Law, especially those who meet the conditions set forth in Law 964 of 2005, Article 44, Paragraph 2, and other regulations that add, modify or repeal it, and, therefore, independent shall be understood as a person who in no case is an Independent Member:

1) Employee or officer of the BANK or of any of its affiliates, subsidiaries or controlling companies, including those persons who have held such position during the year immediately preceding the appointment, except in the case of the re-election of an independent person.
2) Shareholders who directly or by virtue of an agreement direct, guide or control the majority of the voting rights of the entity or who determine the majority composition of the administrative, management or control bodies thereof.
3) Partner or employee of associations or companies that provide advisory or consulting services to the BANK or to companies belonging to the same economic group of which the BANK is a part, when the income for such concept represents twenty percent (20%) or more of their operating income.
4) Employee or officer of a foundation, association or society that receives significant donations from the BANK. Significant donations are considered to be those that represent more than twenty percent (20%) of the total donations received by the respective institution.
5) Administrator of an entity whose board of directors includes a legal representative of the BANK.
6) A person who receives from the BANK any remuneration other than fees as a member of the board of directors, the audit committee or any other committee created by the board of directors.

TITLE IV. RELATIONS OF THE MEMBERS OF THE BOARD OF DIRECTORS

ARTICLE 4.01.- RESOLUTION OF CONFLICTS OF INTEREST OF THE MEMBERS OF THE BOARD OF DIRECTORS.

In accordance with the Code of Good Governance:

1) All Directors who are faced with a conflict of interest or consider that they may be faced with one, must promptly inform the Entity, about any situation that may involve a conflict of interest, including family or personal relationships.

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2) The Directors may not disregard, limit or restrict in any way the rights of any shareholder, who shall have all the powers conferred by law for the exercise of such rights.

3) When a conflict of interest arises between a Director and a Shareholder, the Board of Directors shall be convened to discuss the case. In making the decision, compliance with the regulations in force and the interests of the Company shall prevail.

TITLE V. BOARD OF DIRECTORS OFFICERS

ARTICLE 5.01.- PRESIDENT OF THE BOARD

The President of the Board of Directors shall be elected from the membership by the members of the Board of Directors. This shall be the permanent spokesperson for the Board of Directors and the Committees.

The President and/or any member of the Board of Directors may attend the Shareholders' Meeting as a guest, in order to respond to the Shareholders' concerns.

The President of the Board of Directors shall, to the extent possible, prepare the Agenda for each Board of Directors meeting. Such agenda may be agreed upon topics and work recommended by the President of the Bank.

ARTICLE 5.02.- VICEPRESIDENT OF THE BOARD OF DIRECTORS

The Vice President of the Board of Directors shall be elected from among the directors.

The Vice President shall substitute for the President in the President's permanent or temporary absence, and shall have the same duties as those assigned to the President of the Board of Directors.

In the absence of the President, the Vice President shall preside and direct the meetings and deliberations of the Board of Directors. In the absence of the President, the member of the Board of Directors to whom it corresponds in accordance with the provisions of the Bylaws, the Code of Good Governance and the Law, shall preside and direct the meetings and deliberations of the Board of Directors.

ARTICLE 5.03.- GENERAL SECRETARY

The duties of the Secretary General shall include, but not be limited to, the following:

i. To endeavor to comply with the established deadlines for the delivery of the items to be discussed at the Board of Directors' meetings.
ii. To keep and safeguard the historical memory of the minutes in accordance with the applicable regulations and in the place established by the Bank

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iii. To ensure the formal legal compliance of the actions of the Board of Directors, in accordance with the provisions of the rules, bylaws and other internal regulations.

TITLE VI. FUNCTIONING OF THE BOARD OF DIRECTORS

ARTICLE 6.01.- TYPES, FREQUENCY AND LOCATION OF MEETINGS

The meetings of the Board of Directors shall be of the following types:

1) Ordinary Meetings: the Board of Directors shall meet on an ordinary basis, at least every fifteen (15) days upon convocation by the President of the BANK.
2) Extraordinary Meetings: The Board of Directors shall meet extraordinarily when called by the of the Board of Directors, by the President of the BANK, by the Statutory Auditor or by two of its members acting as principals.
3) Non-Presential Meetings: Non-presential meetings may be held, provided the legal requirements are met.

ARTICLE 6.02.- CALL FOR PROPOSALS and WORK PLAN

The meetings of the Board of Directors shall be called by any suitable means indicating the place, date and time of the meeting.

The President of the Board of Directors may prepare, with the collaboration of the Secretary General and the President of the Bank, a work plan for the Board of Directors, which shall include, but not be limited to, the following activities, among others:

1) Establish, in accordance with Article 32 of the Bank's Bylaws, the schedule for holding periodic Board of Directors meetings (every 15 days) with dates and times. As well as to ensure that the aforementioned meetings of the Board of Directors are complied with.
2) The aforementioned meetings of the Board of Directors shall have the duration deemed necessary.

WORK PLAN: In accordance with the provisions of the Bank's bylaws and paragraph 6.01 above, the Board of Directors shall meet with the frequency indicated therein. In the event it deems it necessary to hold additional meetings, the Work Plan may be reviewed by the President of the Board of Directors, and may be assisted by the Secretary and the President of the Company.

It may also periodically establish a plan of topics to be discussed at meetings, dates of Board meetings and may require Senior Management to review the strategy being developed as necessary. The model is included as Annex E

ARTICLE 6.03.- DELIBERATIVE QUORUM

The Board of Directors shall validly deliberate with the presence of the majority of its Members.

ARTICLE 6.04.- ATTENDANCE OF BOARD MEMBERS

In addition to the provisions of Colombian law, Board members shall endeavor to attend at least 75% of the regular meetings of the Board of Directors. The absence of a member of the Board of Directors for a period of more than three consecutive months shall result in the vacancy of the position of Director.[1]

ARTICLE 6.05.- PARTICIPATION OF OTHERS IN MEETINGS

The President of the BANK shall attend the meetings of the Board of Directors and shall have voice but no vote.

Any other officer of the institution may also attend at the invitation of the Board of Directors or the President of the BANK.

ARTICLE 6.06.- DECISION-MAKING QUORUM

The Board of Directors shall validly decide with the affirmative vote of the majority of its members present.

ARTICLE 6.07.- VOTING

When a tie vote of the Board of Directors results in a vote, the motion shall be deemed denied, but may be discussed again at another meeting of the Board of Directors.

If again there is a tie vote, the matter shall be considered denied, and may be taken up again only at the request of a majority of the Board of Directors.

TITLE VII. ACTS

ARTICLE 7.01.- ACTS

The deliberations and decisions of each meeting shall be recorded in minutes that shall comply with all the requirements of the law, the bylaws and the regulations.

with all the requirements of the Law, the Bylaws and the Rules of Procedure. The Minutes Book shall be kept in accordance with the legal provisions.

Each Minute shall be submitted to the consideration of the Board of Directors at the same or the following meeting and, once approved, shall be signed by the president of the corresponding meeting and by the person who acted as Secretary.

TITLE VIII. BOARD COMMITTEES

[1] Article [73] item 4 of the Organic Statute of the Financial System

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ARTICLE 8.01.- SUPPORT COMMITTEES

The Board of Directors may form the Committees it deems convenient to support its functions. The Committees of the Board of Directors may have the support of members of senior management and/or external advisors when they deem it convenient or necessary to carry out the tasks within their competence.

For the integration of its Committees, the Board of Directors shall take into consideration, among other factors, the profiles, knowledge and professional experience of the members appointed to be part of them, in relation to the subject matter of the Committee.

The following Committees are bodies that form part of the Board of Directors, with the purpose of facilitating the development of the functions and the fulfillment of the objectives of the Board of Directors, which shall have their own rules of procedure:

1) Audit Committee (AC)
2) Nomination, Compensation and Corporate Governance Committee (CNRGCGC) 3) Comprehensive Risk Committee (CR)

TITLE IX. INTERPRETATION AND MODIFICATION

ARTICLE 9.01.- INTERPRETATION

This Regulation must be interpreted in accordance with the legal provisions, the Company's Bylaws and the Code of Good Governance.

ARTICLE 9.02.- MODIFICATION

Amendments to these Regulations shall be made under such terms as the Board of Directors deems pertinent, complying with the same requirements for their approval.

TITLE X. FUNCTIONS OF THE BOARD OF DIRECTORS AT THE SHAREHOLDERS' MEETING

ARTICLE 10.01 AGENDA FOR THE GENERAL SHAREHOLDERS' MEETING

As far as possible, the Board of Directors shall submit the proposed resolutions to the shareholders for each item on the agenda, simultaneously with the call of the meeting or at least fifteen (15) common days prior to the meeting.

10.02 PROPOSED AGENDA ITEMS

In the event that the Board of Directors proposes the Agenda, an effort shall be made to disclose the important issues in a clear and transparent manner.

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Notwithstanding the foregoing, in the cases in which such Agenda proposals are presented, the President of the Bank and the Legal Vice President shall be supported in structuring the relevance of the decisions to be adopted at the Meeting for the benefit of the entity.

TITLE XI. VARIOUS

ARTICLE 11.01 . INFORMATION FOR NEW DIRECTORS

The new members of the Board of Directors shall be provided with sufficient information so that they are aware of the Bank, the sector in which it operates, and their responsibilities, obligations and powers.

For purposes of the foregoing, an induction shall be given to the new directors. Likewise, the Directors may consult basic information on the Bank's website (for example: Bylaws, Code of Good Governance, Board of Directors Regulations, Financial Statements, among others).

ARTICLE 11.02. INFORMATION MEETINGS

To the extent possible, the information to be discussed at the respective meeting shall be made available to the Directors at least five (5) calendar days in advance. Likewise, the Directors may request, through the President of the Bank or the Secretary of the Board of Directors, the information they deem necessary for adequate decision making.

The President of the Board and/or the Secretary may verify the relevance and/or timeliness in which the Directors receive such information.

ARTICLE 11.03. BOARD EVALUATION

The Board of Directors may conduct an evaluation of its work, which may include its committees and/or its directors. For this purpose, it may consider peer evaluation. The result of the evaluation may be used to make proposals to help improve the performance of its duties. In the event that it deems it necessary, it may propose an evaluation by independent assessors.

ARTICLE 11.04 RELATIONSHIP WITH THE SHAREHOLDER

Requests related to access to shareholder information, resolution of information requests, clarity in communication channels, among others, will be handled by the Service Department (Securities and Collection). The procedure for responding to such requests, as well as access to information, will be handled in accordance with the terms established by law. In turn, efforts will be made to inform the communication channels for shareholders, such as, for example, the Web Page.

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ANNEX A – CERTIFICATE OF INDEPENDENCE

Mrs.
BANCO DE OCCIDENTE
City

In order to fill the position of Member of the Board of Directors of Banco de Occidente, I hereby certify that as of the present date I am not a member of the Board of Directors of Banco de Occidente:

- Employee or officer of the Bank or any of its affiliates, subsidiaries or controlling companies, and that I have not held such position during the year immediately preceding this designation.

- Shareholder who directly or by virtue of an agreement directs, directs or controls the majority of the Bank's voting rights or who determines the majority composition of the Bank's administrative, management or controlling bodies.

- Partner or employee of associations or companies that provide advisory or consulting services to the Bank or of companies belonging to the same economic group of which the Bank is a part, when the income for such concept represents for them twenty percent (20%) or more of their operational income.

- - Employee or officer of a foundation, association or society that receives significant donations from the Bank[1].

- Director of an entity in whose board of directors a legal representative of the Bank participates.

- - A person who receives from the Bank any remuneration other than fees as a member of the board of directors, the audit committee or any other committee created by the board of directors.

Likewise, I will inform the Bank immediately and in writing when any of the above conditions change, in order to keep the information on my independence up to date.

Cordially,

Name: C.C.
Date:

[1] Significant donations are those that represent more than twenty percent (20%) of the total donations received by the respective institution.

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ANNEX B

[City], [date]

President
BANCO DE OCCIDENTE
Cali

Reference: Acceptance of appointment as member of the Board of Directors. Dr [____]:
I received your communication dated [], by means of which it informs me that the General Ordinary Shareholders' Meeting of Banco de Occidente S.A. in its session held on [date], me [reelects; appoints] as Member of the Board of Directors for the period [20()-20()], for which reason I accept the designation.

Cordially,

[Candidate's name] C.C.

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ANNEX C - EXAMPLE

Santiago de Cali, [date]

Mr. or Mrs:

«Name»

«Address »

«City»

Banco de Occidente summons its shareholders to the [Extraordinary] General Assembly, to be held on [at 9:00 a.m.], at the offices of Carrera 4ª No. 7-61 Piso 15, in the city of Cali.

Agenda:

1. Verification of quorum
2. Reading and approval of the agenda
3. Appointment of the committee to draft and approve the minutes (...)

The Bank places at your disposal the exclusive channel for Shareholders and Investors, available on the Bank's Web Page, Institutional Link, Securities Issues - Shareholder Information.
Shareholders who are unable to attend, are kindly requested to be represented by means of a written communication addressed to the Bank's President's Office.

Cordially,

BANCO DE OCCIDENTE S.A.
VIGILADO SUPERINTENDENCIA FINANCIERA DE COLOMBIA

ANNEX D.

[City], [date]

Shareholders
BANCO DE OCCIDENTE
Cali

Reference: Letter of Commitment. Respected Shareholders' Meeting:
In view of the confidential or relevant information that I may come to know of relevant transactions such as Takeover Bids, Mergers or Spin-offs, in my capacity as [member of the Board of Directors/Senior Management Position] of Banco de Occidente, I undertake not to trade, directly or indirectly through an intermediary, shares of the company, for the time that the Shareholders' Meeting deems appropriate.

I also declare that I know and understand that in accordance with the regulations governing the securities market, there are restrictions on the use of confidential and privileged information, including the following rules:

- Law 964 of 2005, Article 50, Section e): Whereby the non-compliance with the rules on privileged information or the improper use or disclosure of information subject to confidentiality is considered a violation of the securities market.

- Code of Commerce, Article 404: This article establishes that the company's administrators may not alienate or acquire shares of the company while they are in office, except in the case of operations unrelated to speculative motives and provided that they have the authorization of the Board of Directors and/or the Shareholders' Meeting, as applicable.

- Penal Code, Article 258: This article states that whoever makes undue use of privileged information in order to obtain benefits for himself or for a third party, through the negotiation of shares, securities or instruments registered in the National Registry of Securities and Issuers, shall incur a prison term of one to three years and a fine of five to fifty Minimum Legal Monthly Wages in force.

Cordially,

[Candidate's name] C.C.

VIGILADO SUPERINTENDENCIA FINANCIERA DE COLOMBIA
BANCO DE OCCIDENTE S.A.
Banco de Occidente | Del lado de los que hacen.
Grupo AVAL

ANNEX E

WORK PLAN

Ordinary, Extraordinary, and Shareholders' Meetings

Banco de Occidente

Great Place To Work. Best Workplaces in Latin America 2024

▶ Year 2025 - 8:00 a.m. to 12:00 p.m.

January	10		24
February	14	*21	28
March	14		28
March – Shareholders' Meeting	26	-	2:30 p.m.
April	11		25
May	9	*16	23
June	13		27
July	11		25
August	8	*15	22
September	12		26
October	10		24
November	14	*21	28
December	12		19

NOTE: Meeting dates marked with an asterisk (*) correspond to extraordinary meetings by the Integral Quarterly Risk Committee - SIAR