Participation of Banco de Occidente in trade associations aligned with climate change.

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Lobbying and trade associations – Climate alignment

Banco de Occidente recognizes the importance of the financial sector in the transition toward a low-carbon economy and the relevance of promoting spaces for dialogue and coordination with public and private actors to contribute to sustainable development, climate change management, and the strengthening of sustainable finance.

In line with its sustainability strategy and climate commitments, the Bank participates in trade associations, sector initiatives, and institutional forums that promote practices aligned with the Paris Agreement and the principles of corporate sustainability.

The Bank participates in technical and sectoral forums related to sustainable finance, climate regulation, and ESG risk management, contributing to public–private dialogue and the development of initiatives aligned with the climate transition and the strengthening of the financial sector.

Governance framework for regulatory affairs and industry relations.

Banco de Occidente has guidelines for participation in industry associations and the monitoring of regulatory affairs and public policy related to sustainability and climate change.

The Sustainability Management leads the technical evaluation of the associations, initiatives, and participation spaces in which the Bank is involved, in coordination with the Institutional Relations, Legal, Risk areas, and the involved vice presidencies, according to the nature of each initiative.

As part of this process, the following is evaluated:

- The alignment of the public positions of the associations with the Bank's climate and sustainability strategy.
- The contribution of such associations to topics related to climate change, energy transition, and sustainable finance.
- The regulatory, reputational, and ESG risks associated with industry participation.
- The consistency of the initiatives and activities carried out with corporate commitments and the principles of the Paris Agreement.

The results of this analysis are presented to the Sustainability Committee, the body responsible for validating recommendations related to the continuity, adjustment, conditioning, or reevaluation of the Bank's participation in such associations, strengthening executive-level oversight on public policy and sustainability matters.

Management of misalignments against climatic positions

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Banco de Occidente periodically monitors the public positions, regulatory agendas, and activities carried out by the industry associations in which it participates, with the objective of verifying their consistency with the Bank's climate commitments and the principles of the Paris Agreement.

The Bank conducts an annual review of the climate alignment of relevant industry associations and sector initiatives, considering their public positions, activities, regulatory contributions, and participation in topics related to climate change and sustainability.

When potential misalignments with the institutional climate strategy are identified, the Sustainability Management develops a technical analysis that may include:

- Dialogue and feedback processes with the corresponding association.
- Requests for review or clarification regarding public positions.
- Escalation of the analysis to the Sustainability Committee.
- Reevaluation of the Bank's continued participation in the association, considering reputational, regulatory, and strategic impacts.

The Bank may reconsider, condition, or terminate its participation in associations whose positions are persistently inconsistent with its climate strategy and the principles of the Paris Agreement.

Monitoring, evaluation, and reporting

The Bank conducts periodic reviews of its participation in industry associations and institutional spaces related to sustainability and climate change. The monitoring includes the review of objectives, activities, public positions, and sector contributions of each association.

Information related to associations, public positions, identified risks, and participation outcomes is consolidated and documented periodically for the purposes of monitoring, traceability, and internal decision-making.

The findings and conclusions derived from this analysis are integrated into internal sustainability and corporate governance processes, strengthening decision-making and alignment with international ESG standards and best practices.

Political neutrality

Banco de Occidente maintains a neutral position regarding political matters and does not make contributions to electoral campaigns or political lobbying organizations in the jurisdictions where it operates.

Associations aligned with the Bank's climate strategy

Association	Related topic	Alignment verified	Bank participation
Asobancaria	Sustainable finance and financial regulation	Yes	Sectoral and technical participation
ANDI	Business sustainability and climate change	Yes	Industry participation
ANIF	Economic policy and regulation	Yes	Technical participation
UNEP-FI	Sustainable finance and climate	Yes	Membership and institutional participation
Pacto Global Red Colombia	Corporate sustainability and SDGs	Yes	Institutional participation
Finance for Biodiversity	Biodiversity and financial risks	Yes	Institutional participation