Banco de Occidente

PERIODIC YEAR-END REPORT 2024



Great Place To Work. Certificada AGO 2024-AGO 2025 COL

EL MEJOR LUGAR PARA #1 TRABAJAR EN COLOMBIA

ANOTHER YEAR

on the side of people that make things happen

Grupo AVAL

MANAGEMENT AND SUSTAINABILITY REPORT 2024

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

Presentation

Banco de Occidente is a corporation with securities in the market through the trading system of the Colombian Stock Exchange for ordinary and subordinated bonds. As of December 31, 2024, $4.00T has been issued and $3.90T has been placed, of which $3.90T of series A Fixed Rate and B under IBR are still in force, with average opening and maturity terms being 2016 and 2028, respectively. At the end of 2024, the current issuance and placement program is $12.00T with an available limit of $6.00T to meet the needs of raising resources.

Likewise, Banco de Occidente's shares are registered and traded on the Colombian Stock Exchange under the modality of ordinary shares.

City of principal domicile:
Santiago de Cali, Valle del Cauca, Colombia

Address of the main address:
Carrera 4 # 7-61.



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

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VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Glossary

Absenteeism: occurs when the worker does not attend or leaves his or her workplace, either with or without justification.

Agile Scaling: methodology to carry out projects in a flexible, dynamic and fast way to give productivity to teams.ADL Digital LAB: corresponds to a digital service provider.

ADL Digital LAB: corresponds to a digital service provider.

Balance Score Card: management tool that applies predictive and balanced performance indicators from the financial, persons, processes and customers perspective within the company.

Basel: are the international agreements or recommendations on banking supervision, issued by the Basel Committee on Banking Supervision (CBSB).

Biodegradation: it is the ability of some materials to decompose naturally without human intervention.

Biodiversity: a term that includes the living species that provide the Earth's life support system; a grouping of plants, animals, insects and fish make up the ecosystems that provide us with food, clean water, air and energy.

Bond: these are negotiable securities that represent a debt. Therefore, it can be said that when an investor acquires a bond, he is lending money to a company. The company that issues the bonds acquires the obligation to return to the holder of the bond (once the period established in it has elapsed) the amount of the investment plus a sum of money as interest (this is the investor's return).

BPO: is the outsourcing of business process functions to service providers, either internal or external to the company.

Braille: a reading and writing system made of raised dots used by visually impaired people to understand by touch with their fingers.

Carbon Footprint: indicator of impact on the environment due to the activities carried out by human beings with respect to the amount of resources used and generated

Carpooling: a term in the English language that means "sharing the vehicle" where several people travel on defined routes to the same destination and seeks to reduce the use of private vehicles with only one person on board.

Career Plan: it is the growth path defined so that employees can project their career at the Bank according to their competencies and expectations. It is articulated with our Corporate University and we are working on the construction of learning paths for each position. Currently, the operational and commercial career plan is structured.

CDC: in technology it corresponds to Change Data Capture, software that allows you to integrate, optimize and efficiently manage databases.

Coaching: professional training of a person to achieve their goals through communication, self-confidence, personal development and leadership.

Collective Investment Funds: mechanism or vehicle for savings or administration of sums of money or other assets, integrated with the contribution of a plural number of determinable persons once the fund comes into operation. These resources will be managed collectively to obtain collective economic results.

Commercial Trust: legal transaction by virtue of which a person, called the settlor, transfers one or more specified assets to another, called the trustee, who undertakes to administer or dispose of them to fulfill a purpose determined by the constituent, for the benefit of the latter or a third party called beneficiary or trustee.

Collaborating Brand: talent recruitment, commitment and retention processes.

Contractor: A person hired by the reporting organization to perform work that would otherwise be performed by a employees, at a workplace controlled by the organization.

Content Hub: web space where all the platform's content converges, regardless of its format.

Credit Risk: possibility that one of the parties to a financial contract is unable to meet the financial obligations acquired; as a result, the other party loses.

Credit Scoring: is a credit evaluation methodology that consists of assigning a score to the potential debtor. In this way, the customer's ability to pay is measured.

Critical Talent: positions of high impact and importance for the fulfillment of the organization's objectives and their replacement implies a significant cost so they are fine-tuned in the personnel.

Customers: Persons or companies that acquire, for their use, products and/or services offered by Banco de Occidente and its subsidiaries. Cybersecurity: It is the practice of protecting important systems and confidential information from possible digital attacks.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Dale: is a digital wallet from Grupo Aval that allows users to send and receive money, make payments, make withdrawals at ATMs and refill balance easily and securely from their cell phone, without the need for a traditional bank account.

Dashboard: tool or dashboard that reflects the management of performance indicators to monitor business objectives and processes.

Dematerialized Promissory Note: security that supports credit operations that is not in physical form but by digital means.

Disability: disability is a concept that relates the sensory, physical, cognitive, intellectual, psychosocial and multiple differences that a person may have. This is articulated with the physical, attitudinal and communication barriers that limit their participation and access to different areas or work, social and economic contexts, among others.

Discrimination: are the actions or omissions that exclude, violate or affect in any way (physical, psychological, structural, among other forms of violence) a person because of their sexua orientation, gender identity, ethnicity, age, disability, place of origin, class or other marker of difference.

Digital Ratio: in marketing, it corresponds to the percentage of interested parties who visit a website and stay doing the process that is being promoted.

Discharges: final disposal of liquids in bodies of water, soil or drains.

Diversity: refers to the multiple ways of being that characterize the groups and societies that make up humanity, it is manifested in the plurality of identity, social, cultural, ethnic and religious particularities, among others, that define each person and give added value to society.

Donation: a purely voluntary act by which a natural or legal person gives resources in money or in kind for the benefit of another, without obtaining anything in return.

Elderly: adulthood that begins from the age of 60; also classified as a senior citizen.

Electronic streamers: a physical self-service channel that makes it easier for the user to carry out transactions such as payments, inquiries and withdrawals, among others, with the use of the debit or credit card of Banco de Occidente or Grupo Aval entities.

Emotional Benefit: it is the one that the employees receives, in addition to their economic remuneration, related to their sensations and feelings with which they create a bond with the company or the brand.

Electronic Channels: mechanisms or options offered by our Bank to carry out transactions virtually.

Electric Vehicle: car or land transportation that uses electricity for mobility, must be connected to an energy source.

Employees: a person who has a direct employment relationship with our Bank through a permanent or indefinite employment contract, and who fulfills obligations in exchange for remuneration that includes legal and extralegal benefits.

Employees Journey: measurement that allows us to know the traceability and performance of a employees in the company from their entry to retirement.

Energy Efficiency: the ability to obtain the same or better results using the least amount of energy resources.

Finance for Biodiversity: a global initiative that seeks to mobilize the financial sector to support the conservation and restoration of biodiversity through responsible investments and sustainable strategies.

FINDEV: is Canada's development finance institution (DFI), which supports the private sector in developing markets to promote sustainable development.

Financed Emissions: are the greenhouse gas (GHG) emissions resulting from loans.

Fiscal Policy: policy established by the Bank regarding transparency and responsibility in tax obligations.

Franchise: commercial contract by means of which a license is granted for the exploitation of a trademark and procedures.

Fusiondata: management system for government entities and whatever deemed necessary.

Global Compact: UN initiative that encourages companies to adopt principles in human rights, labor standards, the environment and anti-corruption to promote sustainability and corporate responsibility.

GPTW Certification: recognition granted by the Great Place To Work Institute and Icontec that certifies entities with high quality standards in the work environment and highlights the best places to work nationally and internationally.

Hybrid: A way of working that offers the possibility of working some days of the week from home and others in the offices.

Hybrid Vehicle: Car or land transport that combines gasoline or diesel combustion with an electric motor for mobility.

IDB (Inter-American Development Bank): Multilateral organization whose objective is to offer financial solutions for the economic and social development of the region.

Liquidity Risk: probability of incurring losses due to not having sufficient resources to meet the obligations assumed.

Licenses: the right to use software or any other creation associated with a tracing language.

Liquidity: A person or company's ability to convert its assets into cash to cover its financial obligations.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Market Risk: Potential loss of the value of financial assets caused by adverse changes in the factors that determine their price.

Material Efficiency: corresponds to the metric of comparison between measures of cost, efficiency and flow of raw materials in their consumption, transformation and disposal to optimize processes.

Market Share: in marketing, it corresponds to the indicator of market share or fraction that the organization has in a specific segment.

Materiality: in sustainability management, it corresponds to the environmental, social and governance aspects that the organization prioritizes based on the positive or negative impact on its stakeholders.

MSCI Colcap: An index jointly created by MSCI and the Colombian Stock Exchange (BVC), it is designed to represent the performance of the Colombian stock market and aims to include a minimum of 25 securities and 20 issuers based on free-float adjusted market capitalization, liquidity and international investment criteria.

Net Stable Funding Ratio (CFEN): corresponds to the ratio between the Stable Available Funding (FED) and the Required Stable Funding (FER), according to the definitions established by the Finance Superintendence of Colombia.

NEXA BPO: trademark of the affiliate Ventas y Servicios S.A.

Omnichannel: refers to all touchpoints in the customer lifecycle — such as websites, social media, real-time chats, emails, phone calls, among others — work together, guaranteeing the user that their requirements are met quickly and seamlessly.

Openbanking: is a model that facilitates the exchange of information between all types of financial institutions through application programming interfaces (APIs). In this model, users are the owners of their financial information, therefore, they decide to share their data or not, with the aim of offering new products and services according to the needs of customers.

Other Copyright: any other right that recognizes ownership over an invention in accordance with current regulations.

Occupational Disease: Work-related injury, ailment, or illness that results in any of the following: Death, days off work, work restrictions or transfer to other positions, fainting or medical treatment beyond first aid, or serious injury or illness diagnosed by a physician or other certified health care professional, even if it does not result in the foregoing.

Occupational Accident: any unforeseen event at work that causes the worker an organic or psychological injury, disability or death.

Operational Risk: is the possibility that the entity incurs losses due to deficiencies, failures or inadequate functioning of processes, technology, infrastructure or human resources, as well as the occurrence of external events associated with them. It includes legal risk.

Occupational Risks: source or situation that can cause injuries or deterioration of health.

Organic Guidelines: corresponds to advertising (advertisements, news) or content that is disseminated by digital means at no cost.

PSE Button: digital tool that allows our customers to make payments and collections virtually and securely.

Public Trust: trust business that is entered into with public entities in accordance with the regulations applicable to the resources subject to the contract.

Private Equity Funds: are closed-end collective investment funds that must allocate at least two-thirds of the contributions of their investors to the acquisition of assets or rights of economic content other than securities registered in the National Registry of Securities and Issuers -RNVE.

Payment Gateway: is the service that allows merchants to carry out customer collection operations by exchanging data between the seller's bank and the buyer's bank electronically (online), which allows the use of various payment methods (e.g. PSE, credit card, debit card and cash, among others). In addition, it provides value-added services such as the construction of the merchant's website, the integration of payment buttons through Web Service or Apis, and enriched and online information.

Patents: industrial property right that recognizes the invention of a product or process, with an inventive level and industrial application.

Pensioner: a person who is a beneficiary of a pension mainly for retirement, widowhood, disability or invalidity.

Parental Leave: leave granted by the company to employees who become fathers or mothers. Our Bank grants additional days to those stipulated by law.

Pet Friendly: offices that allow the entry and stay of pets (mainly dogs and cats) in the company of their owner so that they can carry out the activities they require.

Pricing: "assigning price" in English, is the process of setting the prices of products and services.

Prospects: person or company that shows interest in what the Bank is offering and becomes a target audience for the company's product or service offering.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Recycling: Reprocessing products or product components that have become waste to create new materials.

Recruitment: process of managing the hiring or enlistment of candidates for positions in the Bank.

Recycled PVC: PVC (polyvinyl chloride) plastic material reused through transformation into new products, in this case it is used for the production of physical credit cards that are delivered to our customers.

Retention Plan: consists of the different actions or initiatives that Banco de Occidente has aimed at guaranteeing the permanence of employees in the organization for a prolonged period of time to strengthen their commitment through access to different salary or emotional benefits.

SAES: Special Administrative Service, are specialized services tailored to the customer in the Government Banking segment of Banco de Occidente.

SARLAFT: Money Laundering and Terrorist Financing and Proliferation of Weapons of Mass Destruction Risk Management System, which manages the identification of operational, legal, contagion and reputational risks. It is found in the Bank's procedures manual.

Salary Ratio: statistical indicator that determines the relationship between the minimum wage and the average salary of the Bank's employees.

Secondary Market: in the financial sector, it corresponds to the purchase and sale between investors of securities already issued in the primary market.

Self-managed: when the person by himself does the procedure he requires, where he manages and executes an activity.

Solar Power: it is one of the renewable energy sources, which is produced by the light and heat of the sun to produce electricity, lighting and heating.

Sustainable Mobility: transportation program for the Bank's employees, which seeks to reduce CO2 emissions caused by the travel of our employees to and from their homes when they travel to our offices to fulfill their functions, for example: walking, bicycle and electric car use, among others.

Shares: a negotiable instrument that represents a proportional part of a company's equity. It is a participation security, that is, when an investor acquires the shares of a company, he becomes a partner of the company. These instruments grant their holders economic and political rights that can be exercised collectively and individually.

Solvency Ratio: corresponds to the quotient between the technical equity of the entity and the sum of the assets weighted by risk level, market risk and operational risk, in accordance with the definitions established by the Finance Superintendence of Colombia.

Sponsorship: financial support given to an entity in exchange for consideration in advertising and brand visibility.

Supplier: natural or legal person who offers products or services that are required by the Bank and establishes a commercial relationship with it through a contract, invoice or purchase order.

Supply Chain: set of activities that involves everything from the purchase and transformation of raw materials to the manufacture, distribution and delivery of the product to the final consumer.

Stakeholders: people or groups of people who may be positively or negatively affected by the development of our Bank's activities and who also have the capacity to affect this development.

SmartSupervision: platform of the Finance Superintendence for the management of claims.

Select Segment: section of customers of the Bank and its affiliates that corresponds to its active officials.

SOFR: The SOFR rate has been published by the Federal Reserve of New York since 2018 and reflects the overnight cost of loans secured by Repos of US Treasury securities. This rate is based on a diverse and robust market with a large volume of participants.

Success Factor (SSFF): a cloud-based application that allows you to manage data and processes related to Human Resources such as payroll, training, performance evaluation, requests for leave and vacations, etc.

Trust Accounts: fiduciary business by virtue of which a person delivers to another one or more specific assets without transferring their ownership, with the purpose that the latter fulfills a specific purpose with them, either for the benefit of the settlor or a third party.

Tax Approach: compliance with and application of tax regulations to manage the company's business, ethical and social objectives and expectations.

Trademarks: industrial property right that recognizes exclusivity in the use of a distinctive sign associated with a good or service.

Turnover: employees who leave the organization voluntarily or due to dismissal, retirement, or death in service.

Teleworking: type of employment contract where the employee develops his or her role in a place other than the company's facilities, mainly his or her home with the use of information technologies.

UNEP FI (United Nations Environment Programme Finance Initiative): An initiative of the United Nations Environment Programme that promotes sustainable financial practices through collaboration between the UN and the financial sector.

Virtual Classroom: online education mechanism (teaching and learning) through information and communication technology.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Volunteering: activities carried out by the organization in the company of its employees to contribute to different social and/or environmental causes.

Waste: Anything that a person eliminates, wishes to dispose of, or is obligated to dispose of.

Webinar: virtual presentation of courses, conferences, talks, etc. where the person can interact in real time.

Weighted Return: corresponds to the overall return of the portfolio for the capital invested and the cash flow at the beginning and end of the investment.

Work Environment Index: indicates the level of achievement reached by the organization and its leaders, synthesizing the employeese's experience in relation to their work environment.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Presentation





SDG 13.1; 17.5
I GRI 2-5 I

We are pleased to present Banco de Occidente's Management and Sustainability Report, reflecting our commitment to transparency, accountability and responsible management in the environmental, social and governance fields. This report summarizes the actions carried out by our bank in the period between January 1 and December 31, 2024 and has been prepared in reference to the Essential option of the GRI (Global Reporting Initiative) Standards and in compliance with Circular 031 of 2021 of the Finance Superintendence of Colombia.

In its development, we identify the most relevant aspects of our sustainable management, highlighting the achievements reached and the goals that we continue to promote. As part of our commitment to transparency and continuous improvement, we have included the GRI Content Index, as well as the Sustainability Accounting Standards Board (SASB) sector indicators for the commercial banking industry. We also adopted the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), strengthening our climate disclosure strategy.

To guarantee the quality and reliability of the information presented, this report has been submitted to an Independent Limited Assurance process by the firm BDO Audit S.A.S. Regarding financial information, we have the tax audit of KPMG S.A.S. This external verification reaffirms our commitment to integrity, alignment with regulatory frameworks, and the adoption of international best practices.

The report also accounts for our contribution to sustainability at a global level, evidencing our voluntary management around the ten principles of the Global Compact and our participation in key initiatives such as the Sustainable Development Goals (SDGs), the Dow Jones Sustainability Index (DJSI), the United Nations Environment Programme — Finance Initiative (UNEPFI), among others.

To facilitate the understanding of our contribution and compliance with these standards, we have included graphic references throughout the report, such as [GRI 2-25], [SASB FN-CB-410a.2] and the iconography of the SDGs, which allow us to clearly identify our commitment.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Introduction

Our Bank and its Commitment



Great Place To Work. Certificada AGO 2024-AGO 2025 COL

EL MEJOR LUGAR PARA TRABAJAR EN COLOMBIA #1

Banco de Occidente | Grupo AVAL

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A.

Message from the President

SDG 8.3; 10.2
| GRI 2-6; 2-22 |



At Banco de Occidente, we stand with those who take action. We believe that sustainable development is not a distant aspiration, but rather the guiding principle behind our decisions and a challenge to transform realities. Throughout 2024, we reaffirmed our commitment to responsible growth, financial innovation, and positive impact on our communities.

The year we left behind challenged us with a complex economic environment, but it also gave us the opportunity to demonstrate **our resilience, adaptability, and leadership.**

We are proud to have achieved solid growth in our total portfolio, consolidating our commitment to companies and individuals who trust us to make their projects a reality.

We lead with strong results, and we would like to highlight some of the most important milestones:

- ✓ Service is what sets us apart, and we strive every day to have the best indicators. That is why we ended the year with a customer recommendation indicator (NPS) of 68 for businesses and 55 for individuals, reflecting the high level of satisfaction and trust of our customers.
- ✓ We obtained Carbon Neutral certification, reaffirming our responsibility to the environment and setting an ambitious goal of reducing our emissions by 25% by 2030.
- ✓ We structured and financed key projects such as Puerta de Oro, the largest independent solar park in Colombia, and consolidated credit lines with a sustainable focus for USD $150 million.
- ✓ Our total portfolio reached $48.99 trillion, with annual growth of 7.89%, outperforming the banking system as a whole in all lines (commercial, portfolio, and housing).
- ✓ We consolidated our position as the second largest bank in Colombia in terms of foreign currency portfolio, with a 19.14% share, and ranked first among Grupo Aval banks in Finagro substitute portfolio loans, disbursing $3.31 trillion.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

These achievements are not just numbers. They are proof that **we are moving forward with a clear purpose: to make the development of people and their families, business growth, and the sustainable transformation of the country a reality.**

- We launched our new OcciRed app, which already has more than 3,000 customers, improving the user experience and advancing the digitization of our services.
- We were recognized by Great Place to Work Colombia as the best place to work in the country, the best place to work for women, and the best bank to work for in Latin America, reflecting our belief that a company that cares for its people is a company that cares for and is concerned about its customers.
- At COP16, held in Cali, we reaffirmed our commitment to protecting biodiversity and water. In addition, we celebrated more than 30 years of our Blue Planet National Ecology Award with its 16th edition, recognizing 14 initiatives that are transforming our relationship with the natural environment.

For nearly six decades, we have worked with determination to build relationships of trust, generating a positive impact on communities, the environment, and the economy. This translates into decisions that not only benefit our shareholders, but also distribute 60% of the economic value generated—more than 2.1 trillion pesos—among our various stakeholders: suppliers (33%), employees (25%), government (21%), and the remaining 21% among shareholders, customers, and communities.

These achievements are not just numbers. They are proof that we are moving forward with a clear purpose: to make the development of people and their families, business growth, and the sustainable transformation of the country a reality.

Each goal achieved motivates us to continue innovating and challenging the limits of what is possible. We know that the future is built on courageous decisions, ethical leadership, and a vision that goes beyond financial results. In the coming years, we will continue to drive growth, strengthen our digital strategy, and consolidate our role as a key player in the country's transformation.

At Banco de Occidente, we believe that building a sustainable future is not only a responsibility, but also an opportunity to make a difference. We will continue to stand with those who take action, because every action counts and every effort brings us closer to the Colombia we dream of. Thank you to our customers, shareholders, employees, and partners for being part of this journey. Let's continue together, making things happen.

Gerardo Silva Castro.
President of Banco de Occidente.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

About us

At **Banco de Occidente,** we have built a history of trust and soundness that has allowed us to accompany our customers, shareholders, employees and other stakeholders in their growth and evolution. Since our foundation in 1965 in Cali, we have developed innovative and sustainable financial solutions, adapting to the needs of the market and contributing to the progress of the country.

Today we have more than **175 branches, 18 Credit Centers and 3,093 ATMs in Colombia,** in addition to our subsidiaries in Panama and Barbados. Over the years, we have evolved to offer innovative, sustainable financial solutions aligned with market needs.

Our purpose is clear: to make the development of people, the growth of businesses and the transformation of the country a reality. To achieve this, we are guided by four strategic pillars:

We are leaders

Be first in our core segments by **integrating our affiliates,** with relevant, innovative and **competitive value** propositions that enable profitable growth.

We are sustainable

Act in a **responsible and ethical** manner, seeking a positive material impact on **society and the environment,** ensuring the **profitability of the business and shareholders.**

We are digital

Develop a**dvanced processes and technologies,** optimizing **internal operations and customer service,** ensuring confidence in digital transactions.

We are desired

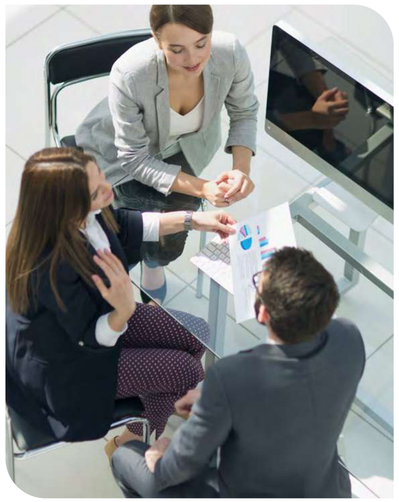
Create memorable experiences for our **customers, collaborators and suppliers,** ensuring their preference for **Banco de Occidente and its affiliates.**



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Our way of acting is defined by values that guide each of our decisions and actions:



Honesty:

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



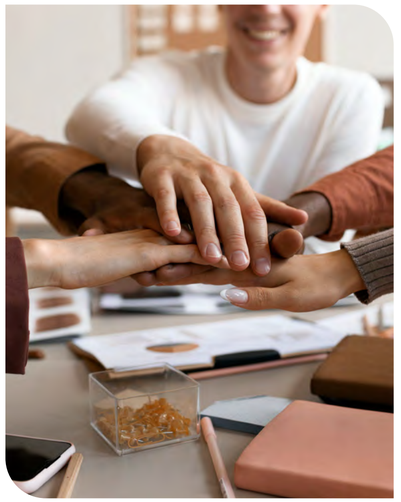
Respect:

We recognize and value people in their integrity.



Determination:

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



Cooperation:

We work together to achieve our objectives and contribute to the development of the Bank.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FILIAL PANAMÁ

It has been 59 years weaving progress. Not only did we grow, we evolved with Colombia, listening to those who make our progress possible. In addition, we have opted for innovation and sustainability as pillars of our growth. Some milestones that mark our trajectory are:

National and International Expansion: from the opening of our first office outside Cali in 1970 to the consolidation of our subsidiaries in Panama and Barbados.

Commitment to Sustainability: from the creation of the National Ecology Award "Planeta Azul" in 1993 to the consolidation of our Sustainability Strategy.

Financial Innovation: we launched our Credencial credit card in 1976 and we have strengthened our solutions with different business units.

Digital Transformation and Customer Experience: we implement new business models, digitize our services and modernize our offices to improve our customers' experience.

With every step we take, we reaffirm our commitment to the country, to our customers and to all those who trust us. We continue to evolve to be a more agile, closer and more sustainable bank.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Our Affiliates

Banco de Occidente de Panamá

This affiliate operates in the International License Banking sector, with a business model based on placement in international portfolios and foreign currency deposits in Colombia through term and demand deposits.

Currently, it has assets of $4,483,099,262,655.65, liabilities of $4,144,357,085,796.67, operating income of $281,981,452,683.51 and expenses of $218,968,876,817.13.

Among its main milestones are the record net profits in the last 10 years, the AAA rating by Fitch Ratings and a record figure in international portfolio placement.

As part of its strategic projects, it is advancing in the implementation of its Securities License to offer investment portfolios. Its main challenges include the implementation of the new license, the improvement of the deposit mix to reduce the cost of funding and keep this reduction in line with the Fed's rates. Looking ahead to 2025, its strategic focus is on the comprehensive strategy of liabilities and payment methSDG, the digital E2E experience, channel optimization and human talent management at the forefront.

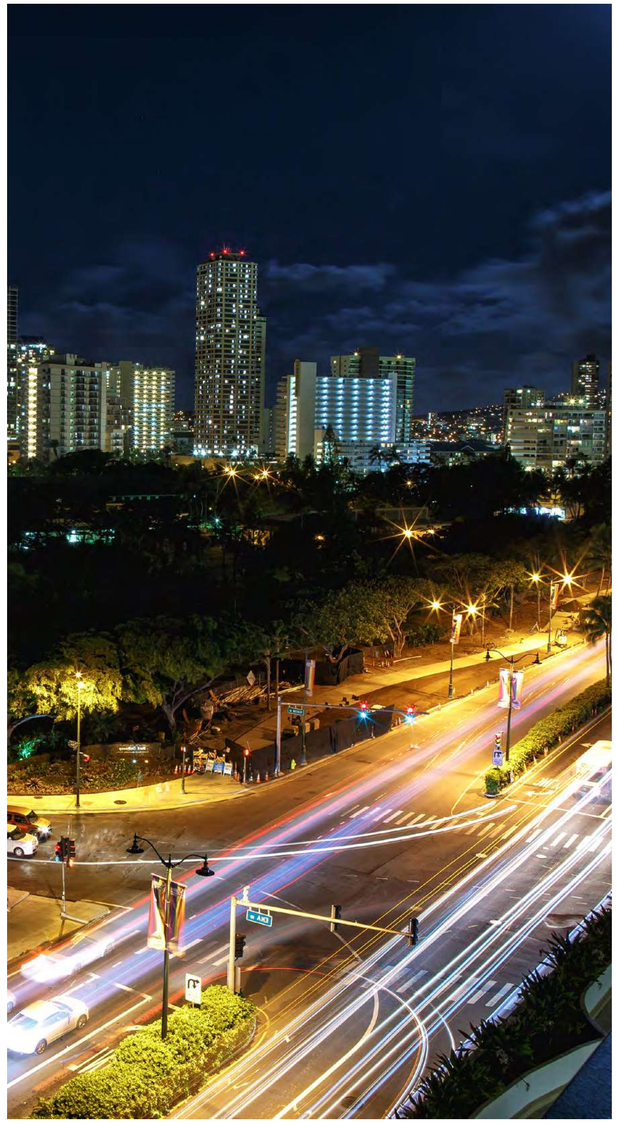
Occidental Bank Barbados

Occidental Bank Barbados operates under the International License Banking regime, focusing its operations on placement in international portfolios and foreign currency deposits from Barbados, as well as in Colombia through term and demand deposits.

With total assets of $1,486,252,493,384.22, liabilities of $1,292,655,885,361.05, operating income of $82,663,888,943.26 and expenses of $61,833,282,341.31, it has set records in net profits for the last 10 years, maintains the best possible rating by Fitch (AAA) and presenting record figures in international portfolio placement. Among its outstanding projects is the obtaining of the Securities License, which makes it possible to offer investment portfolios to its clients.

Currently, its challenges are focused on the implementation of the new approved license to expand its product offerings, on improving the deposit mix to reduce the cost of funding, and on maintaining this reduction in accordance with the Fed's rate reductions.

Looking ahead to 2025, its strategy is oriented towards a comprehensive strategy of liabilities and payment methSDG, the strengthening of the digital E2E experience, channel optimization and human talent management at the forefront.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. PANAMÁ



Nexa BPO

NEXA BPO is a commercial services company that provides contact center and BPO services nationwide to entities from various economic sectors. Its strategic plan focuses on four fronts with nine objectives, aimed at maturing its service offering and diversifying its customer portfolio beyond its natural market, with a focus for 2025 on the growth of turnover in new and current customers, prioritizing competitive margins.

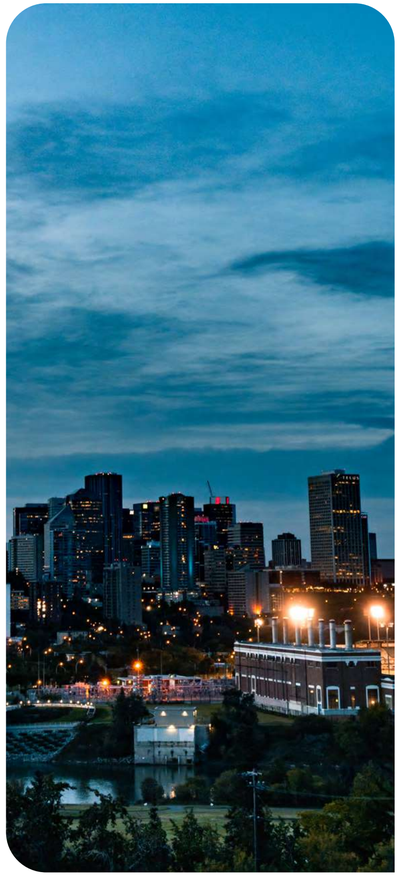
With total assets of $116,912,441,158.62, liabilities of $65,601,934,953.00, operating income of $354,995,851,700.34 and expenses of $352,747,318,391.83. The company consolidated significant progress in its sustainability strategy, in line with its commitment to responsible development and long-term value creation.

Among the milestones are the declaration of its sustainability strategy, the diagnosis and benchmarking in sustainability, the fulfilment of strategic objectives through key indicators, the consolidation of the annual work plan, the development and execution of activities with ESG impact, the identification of material risks and the creation of the Sustainability Committee.

During that same year, NEXA BPO promoted projects such as the Sustainability Ideathon, Recycling, Sustainable Fashion and carbon footprint measurement, while its main challenges included planning activities with greater impact, budget management and the review of the exclusive team for sustainability. Looking ahead to 2025, its strategic goals are to turn NEXA BPO into a BIC company, reduce its carbon footprint, update its sustainability purpose and strengthen its materiality strategy.

> **Its strategic plan focuses on four fronts with nine objectives, aimed at maturing its service offering and diversifying its customer portfolio beyond its natural market, with a focus for 2025 on the growth of turnover in new and current customers, prioritizing competitive margins.**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Fiduciaria de Occidente

Fiduciaria de Occidente is a company dedicated to the execution of commercial trust agreements and non-transferable fiduciary mandates of ownership, whose fundamental purpose is to execute all kinds of commercial trust or trust contracts; receiving trust accounts; managing and investing their wealth to generate the best possible return; acting as a representative or agent of interests of third parties for any purpose; managing assets and investments, representing holders of bonds or any other securities issued in series; managing guarantees constituted by third parties; and managing authorized collective investment funds, including private equity funds, entering into all other transactions permitted to trust companies.

Its strategic plan, designed to consolidate leadership in the fiduciary sector through innovative and sustainable strategies, is aimed at improving the customer experience, optimizing processes and expanding its portfolio of services, based on strategic objectives that include sustainable growth, customer satisfaction, reliability and the well-being of its people. The corporate strategy is based on three pillars: innovation and transformation, alignment with Banco de Occidente and vocation for segments.

With a direct presence in six regional offices nationwide (Barranquilla, Santa Marta, Montería, Medellín, Pereira and Cali) and two offices in Bogotá, **the entity reports total assets of $478,685,146,390.60, liabilities of $38,812,040,800.08, operating income of $225,263,947,869.72 and expenses of $137,101,113,537.71,** reaching record figures in financial indicators (profit and revenue), achieving the best year in NPS results, work environment and internal service, as well as operational efficiency, in addition to being the first fiduciary to have digital onboarding and opening for companies.

Within the framework of its Innovation and Transformation strategy, it has obtained outstanding achievements in the digital transformation of the persons' client market, increasing the share of digitally onboarded customers from 77% to 92% at the end of the year, and initiated a pilot of customer referencing to FICs through alliances with Metrocuadrado and the dale! digital wallet, becoming the group's only fiduciary with such alliances, in addition to being the first trust company to allow the digital onboarding of investors to private equity funds in 2024.

On the Digital Transformation of Companies front, it developed the first digital onboarding flow for Collective Investment Funds for Legal Entities (covering Companies 1, Companies 2, Corporate, Institutional and Government), which allowed it to reach an AUM of 93.5 billion pesos in 371 onboarded customers, with 54% of customers in December digitally onboarded, reducing oboarding times by more than 80% and finalizing the investment process in a period of between 4 hours and one business day. Among the recognitions obtained are its position in the Top 50 of the most innovative companies in Colombia according to ANDI magazine, two FICs awarded at the Prixtar Awards, the seal of good practices in innovation awarded by the CCB and ICONTEC, and an award in the Competitiveness category at the CCB Circle of Affiliates Awards. Its goals include strengthening the positioning of the FICs, consolidating itself as a BIC company, strengthening the commercial and operational synergy with Banco de Occidente, continuing to strengthen the work environment and maintaining its position in the top of the most innovative companies in Colombia, with financial objectives that seek to reach $40 billion in profit and $179 billion in core revenues, grow by 36 bp. in the share of fiduciary commissions and 24 bp. in fund fees, reduce efficiency indicators (below 70%) and operational risk expenditure (below 1.5% in the core), and maintain an NPS above 70% together with an outstanding work environment.

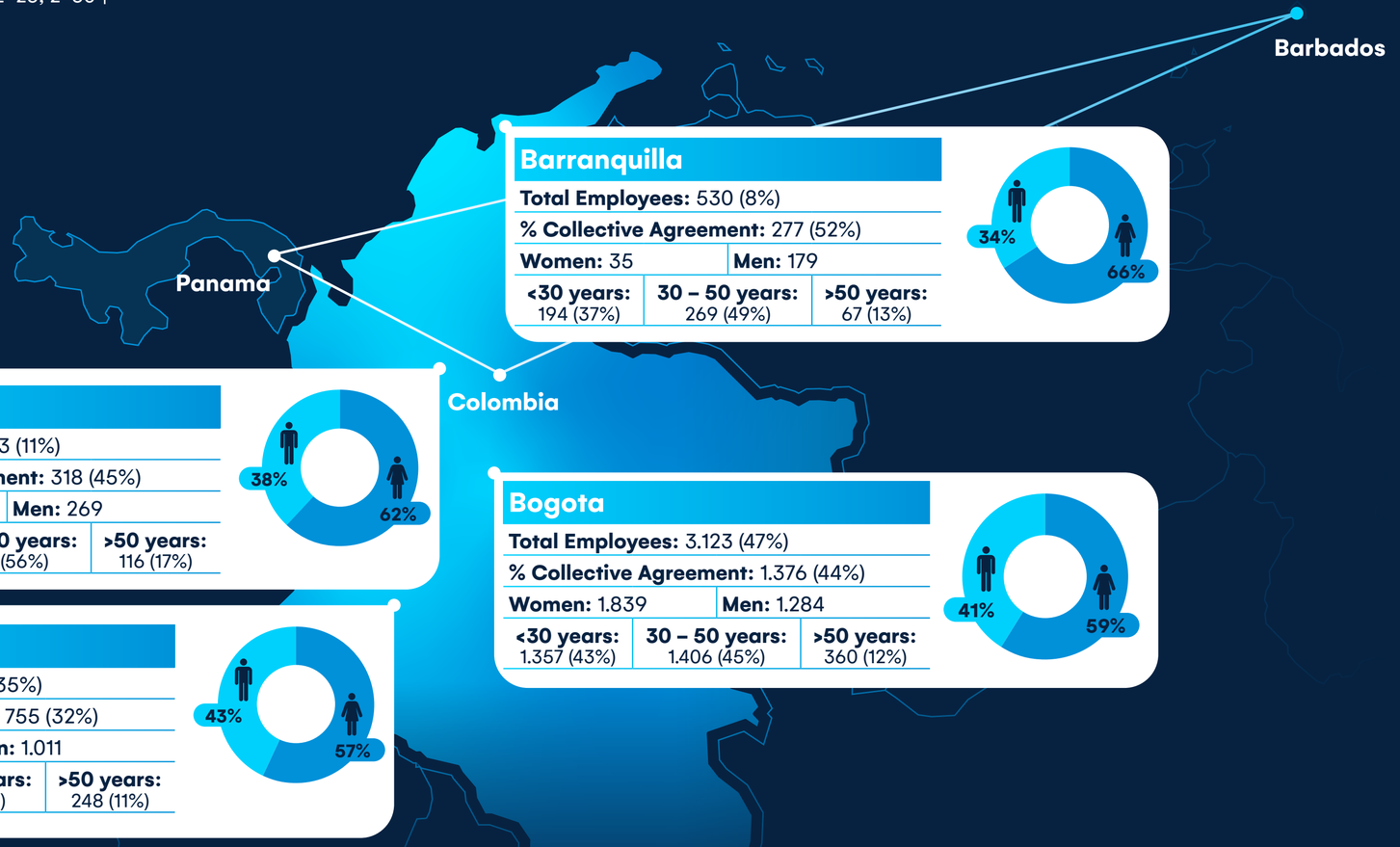
> **Among the recognitions obtained are its position in the Top 50 of the most innovative companies in Colombia according to ANDI magazine, two FICs awarded at the Prixtar Awards.**

Fiduoccidente
FIDUCIARIA DE OCCIDENTE S.A.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

National and International Presence

| GRI 2-1; 2-7; 2-8; 2-9; 2-23; 2-30 |



Barranquilla

Total Employees: 530 (8%)

% Collective Agreement: 277 (52%)

Women: 35	Men: 179

<30 years: 194 (37%)	30 – 50 years: 269 (49%)	>50 years: 67 (13%)

Medellin

Total Employees: 703 (11%)

% Collective Agreement: 318 (45%)

Women: 434	Men: 269

<30 years: 196 (28%)	30 – 50 years: 391 (56%)	>50 years: 116 (17%)

Bogota

Total Employees: 3.123 (47%)

% Collective Agreement: 1.376 (44%)

Women: 1.839	Men: 1.284

<30 years: 1.357 (43%)	30 – 50 years: 1.406 (45%)	>50 years: 360 (12%)

Cali

Total Employees: 2.339 (35%)

% Collective Agreement: 755 (32%)

Women: 1.328	Men: 1.011

<30 years: 920 (39%)	30 – 50 years: 1.171 (50%)	>50 years: 248 (11%)

Apprentices	Women	Men	Total
Bogota	94 65%	50 35%	144 44%
Cali	52 55%	43 45%	95 29%
Medellin	15 56%	12 44%	27 8%
Barranquilla	44 75%	15 25%	59 18%
Total BdO	205 63%	120 37%	325 100%

Affiliate	Employees
Banco Occidente de Panamá	60
Fiduciaria de Occidente	614
Occidental Bank Barbados	3
Nexa BPO	7.459

Total BdO	
Women	3.952 (59%)
Men	2.743 (41%)
<30 years	2.667 (40%)
30 – 50 years	3.237 (48%)
>50 years	791 (12%)
% Collective Agreement	2.726 (41%)
Total Employees	**6.995 (100%)**

* Of our 6,695 employees, 6,197 are engaged with an indefinite term contract, while 498 have a fixed-term contract.
* Union representation that has maintained a stable trend, with variations derived from gradual disaffiliations. The total number of temporary and outsourced employees is 2,224.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Reputation and Recognition

SDG 13.1; 17.5

Our participation in various global initiatives and certifications reflects our commitment to the highest standards. Thanks to our commitment, in 2024 we have achieved important certifications, adhesions and recognitions that reflect our positive impact on society and the environment.

Key Certifications and Memberships:

- **For the second year in a row, we were the best place to work in Colombia,** as well as the best place to work for women and the best bank to work for in Latin America in the large companies category.
- **We achieved the Carbon Neutral certification,** reaffirming our commitment to sustainability and climate action by measuring, reducing and offsetting our carbon footprint.
- We obtained **recertification in Friendly Biz by the Chamber of Diversity,** reflecting our commitment to gender equality and social inclusion.
- **We joined the Finance for Biodiversity Foundation,** reaffirming our commitment to biodiversity.
- **We continued to promote responsible and sustainable finance thanks to our adherence to the United Nations Global Compact,** UNEP-FI and AsoBancaria Green Protocol.

Recognitions in Sustainability and Good Practices:

- **We retained, for the twenty-seventh consecutive year, the triple AAA rating,** the highest credit rating for our long-term debt.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

- We have the **BRC1+ rating, which represents the highest certainty of payment** for our short-term debt, granted by BRC Standard & Poor's.
- We maintained the **highest rating on a national scale for long-term debt** (AAA in Colombia) with a Stable outlook, and for short-term debt (F1+ in Colombia) according to Fitch Ratings.
- According to the **rating update granted by Fitch Ratings, we maintained the Long-Term rating at BB+ and the Short-Term rating at B,** based on the quality of our assets, our business model and the sustainability of our profitability and capital metrics.
- We held the **XVI version of our Blue Planet National Ecology Award,** this time within the framework of COP 16 in Cali, highlighting our leadership in environmental initiatives and recognizing 14 environmental initiatives led by foundations, NGOs, grassroots organizations, companies of all sizes and academia.
- In our second measurement against the Dow Jones Sustainability Index, **we increased our score and placed ourselves in the 79%,** consolidating ourselves as a benchmark in sustainability within the financial sector.
- We were recognized by the Bogota Chamber of Commerce as a **company with exemplary sustainability** practices for our UNICEF credit card.
- **We were winners in the 30th edition of the Portfolio Awards,** in the category of "Human Resource Management" – Organizations that stand out for the search for the well-being of their employees.
- We received the distinction of **Green Seal of Truth** that certifies our environmental commitment.
- We obtained **2nd place in the Punto Cardinal Reputational ranking** of the banking and financial sector in Colombia.
- We entered the **top 100 of Merco's reputation ranking.**
- We reached **5th place in Brandvalorum's ranking of the most valuable brands in Colombia,** within the range of USD $500 million to $1 billion.
- We received the **National Award for Excellence in Innovation and Management (PNEIG).**
- **We created our Human Rights Due Diligence project,** reaffirming our commitment to responsible management and respect for communities.
- **More than 309,000 customers use our digital channels** (Banking Portal and Mobile Banking), with a growth of +18.8%.
- **We implemented the Google Wallet with MasterCard** in Credit Card, expanding digital payment options.
- **AZUL was born,** our internal generative artificial intelligence, designed to optimize processes and improve efficiency in our operations. With this innovation, we strengthen the agility and precision of our services, positively impacting the experience of our customers.
- **We support events that strengthen local identity and talent,** participating in iconic fairs and festivals such as the Manizales Fair, Flower Fair, Barranquilla Carnival and Cali Fair, spaces where we promote regional development and closeness with our customers.
- **We were present at key events** such as the Asobancaria Camp, Cirque du Soleil and sports races in Cali, Popayán, Buga, Buenaventura, Barranquilla, Eje Cafetero and Bucaramanga, promoting healthy lifestyle habits and connection with our communities.
- **We held our motivational forum** with Rigo in Medellín, connecting with our customers and allies through sport and resilience, values that identify us as a bank.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Business Model

Our model is based on two fundamental pillars: **Business Banking and Personal Banking,** each with proposals and solutions designed to meet the specific needs of our customers, helping to promote sustainable businesses and high-quality financial experiences.

Business Banking:

We focus on offering specialized financial solutions for governments, large corporations, medium-sized corporations, institutions and entrepreneurs, among others. To this end, we have implemented improvements that optimize efficiency and increase our customer satisfaction:

Clan Transactions:

- We launched interoperable QR as a means of payment, facilitating immediate payments and boosting interoperability.
- We implemented new means of payment in the GOU gateway, such as the AVAL Button and the Correspondent Banking, which improve the efficiency in transactional costs and expand our collection capillarity.
- We redesigned the Aval Pay Center portal to offer a more renewed and intuitive experience to our customers and users.
- We established a direct connection for processing with MasterCard Acquiring, which allows us to operate faster and activate new technologies and solutions.
- We launched the CarroYa Credit Card, which offers a business payment solution for electronic tolls.
- We automated payments through the H2H channel, increasing third-party payment transactions by 14%.
- We increased our correspondent coverage to more than 8,000 service points throughout the territory.

Clan Loans:

- We were recognized by Findeter as strategic allies in promoting the development of the drinking water and basic sanitation sector.
- We created a sustainable business line in all our credit modalities for companies, with the execution of around 6,000 sustainable operations.
- We enabled the Supply Factor platform for the self-management of customers in all Unidirect modalities, generating disbursements of $1.4T COP.
- In the area of foreign currency, we managed to stabilize BankTrade and enabled the flow of resources through ATH to make transfers.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Personal Banking:

In this segment, we are working to expand product coverage and improve the digital experience, reaching both current customers and new users. Our initiatives include:

Housing loans:

- We expanded customer coverage, allowing joint applications and approvals in UVR and developed a new self-management flow for external allies and enabled a housing simulator via WhatsApp.

Vehicle loans:

- We included independent clients and enabled financing for Chinese and Indian brands and improved the onboarding and legalization processes using the brown paper methodology and implemented a vehicle simulator via WhatsApp.

Digital Innovation:

- We launched our **100% digital credit card Occiflex,** with immediate availability in mobile banking for use.
- We incorporated **Mastercard Credit** cards into Google Wallet, eliminating the need for a physical card to make payments, through Android devices with NFC functionality.
- Our Digital Credit Card was recognized in the seventh version of the awards for good practices in Sustainable Development, standing out for its innovation, impact and relevance in the territory.
- With **18,100 active plastics of our UNICEF Card, we have donated more than $2.22 billion pesos** in the last three years through the agreement we have with our partner, helping communities in La Guajira to have access to drinking water, sanitation and better hygiene practices.
- We implemented the **Touch Card** system on our Credit and Debit cards, allowing visually impaired people to easily identify them by touch. This innovation was awarded Gold at the Fintech Americas Financial Innovators of the Americas Awards, in the Customer Experience category.

This comprehensive business model allows us to serve both organizations and individuals in a differentiated and specialized way, always betting on innovation, operational efficiency and sustainability in each of our proposals.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Great Place To Work.
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#1 EL MEJOR LUGAR PARA TRABAJAR EN COLOMBIA

Responsible **Growth** and Comprehensive Risk Management



Banco de Occidente | Grupo AVAL

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FOGAFIN

Financial Outlook and Stock Market Performance

SDG 8.1; 8.3

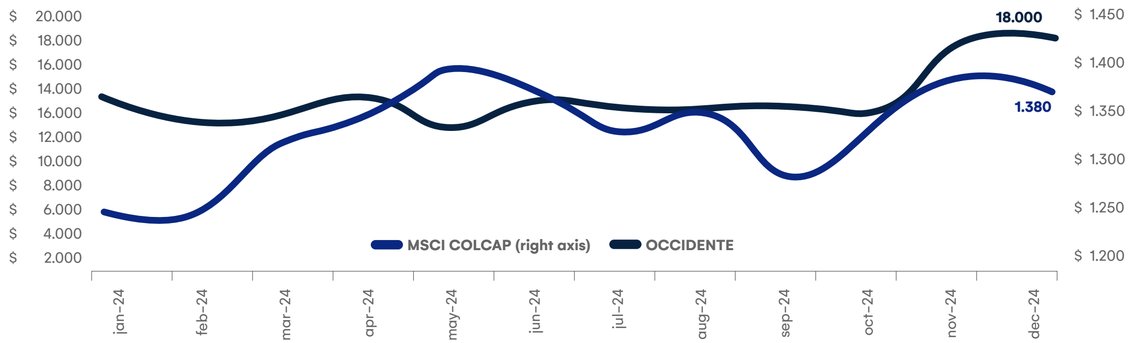
The following conventions are used to understand the figures included in this document:

a) One trillion pesos = $1.00T.
b) One billion pesos = $1.00B.
c) One million pesos = $1MM.
d) One million dollars = USD 1 million.

Our performance in the in the stock market

Our stock traded during 2024 in a range between $11,840 and $18,000, which represents a volatility of $6,160, with an average price in the year of $13,645.

COLCAP and Banco de Occidente Share



On average, the total trading volume was $547 million, with a movement of 40,086 shares.

Banco de Occidente Bonds

During 2024 we did not make any new issuances in terms of fixed-income securities. In the secondary market, 405 operations were carried out, with a trading volume of $502.441 billion with operations in the 23 references of ordinary and subordinated bonds issued by Banco de Occidente.

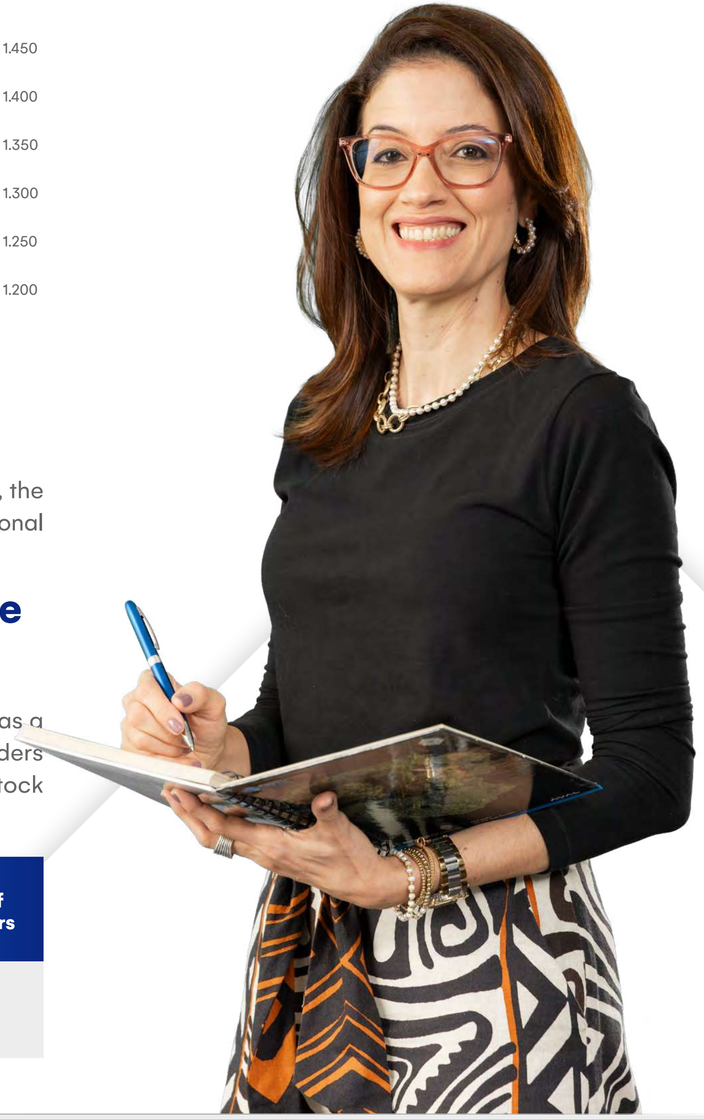
The minimum rate on bonds in the secondary market was 9.0% and the maximum rate was 15.5%, with an average rate at the end of 2024 of 11.39%. The Bank's total share of bonds in the non-trading secondary market of TES was 0.25%.

It is worth mentioning that, at the end of 2024, the Bank issued subordinated bonds in the international market for USD 175MM.

Our shareholder structure and composition

Taking into account that all our shares issued as a Bank are ordinary shares, the 1,358 shareholders that make up the entire participation in the stock capital are observed as follows:

Class of Outstanding Shares	Number of shareholders	Number of shareholders
Ordinary	1.358	100%



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

The beneficiary whose percentage is equal to or greater than 10% of the stock capital is described below:

Identification	Investor Name	Number of shares	Participation	Class of share
8002161815	Grupo Aval acciones y valores S.A	112.671.455	72,2717563%	Ordinary

We are an affiliate of Grupo Aval Acciones y Valores S.A., a company that controls 72.27% of the stock capital and therefore we belong to the business group controlled by the natural person Luis Carlos Sarmiento Angulo.

Thus, at the Shareholders Assembly on March 20, 2024, the distribution of cash dividends was decreed as follows: $115 per month per share, payable within the first ten days of each month in accordance with current legislation, from April 2024 to March 2025, inclusive, out of a total of 155,899,719 shares subscribed and paid as of December 31, 2023.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Macroeconomic outlook

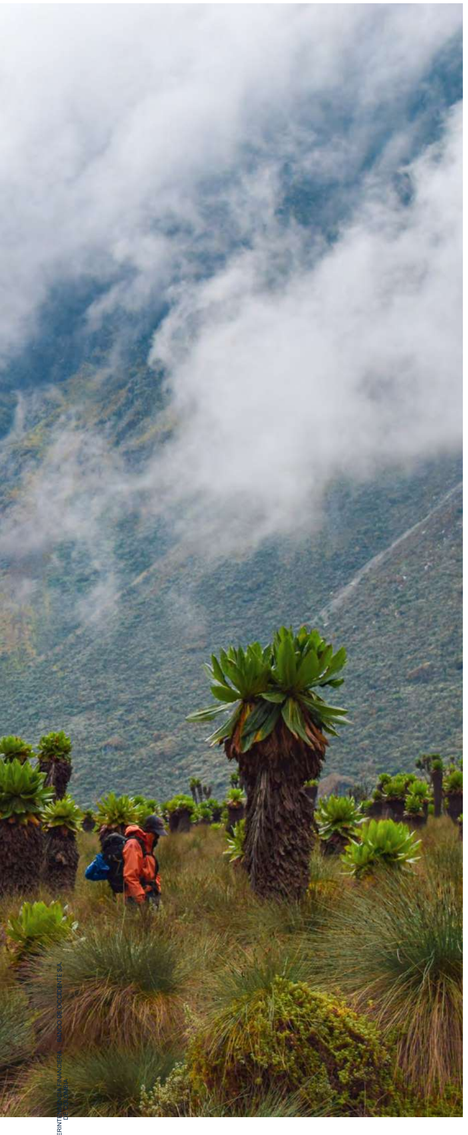
| GRI 203-2 |

2024 was characterized by being a year with a slow moderation of inflation, without a significant economic slowdown. In developed economies, the slowdown in inflation allowed central banks to begin normalizing their monetary policy, although inflation remains at above-target levels.

Regarding the behavior of the markets, during the first half of 2024 the volatility was mainly explained by the dynamics of the labor market in the United States, as concerns arose of an economic slowdown in the country as a result of the increase in unemployment, however, these concerns faded as the American economy continued to grow at a solid pace and the labor market remained stable, which allowed volatility to moderate.

In addition to this, another event that generated stress in the markets and significant movements was what occurred on August 5 on account of the Bank of Japan's (BoJ) decision to surprisingly increase its interest rate by 115 bps to 0.25% at the July 31 meeting, which resulted in a strengthening of the Yen against the dollar, which had reached lows not seen 38 years ago and caused many investors to leverage in Japan and the Yen to finance investments at low interest rates. However, when the BoJ surprisingly raised its interest rate, it deteriorated this investment strategy and forced many investors to liquidate positions to cope with losses on account of the strengthening Yen and higher borrowing costs. In this context, the Nikkei registered a contraction of 12.4%, being the largest fall since 1987, in turn, stock markets around the world temporarily presented significant devaluations.

On the other hand, the presidential elections in the United States marked the global dynamics in the last quarter of the year, consolidating itself as the most relevant economic and political event during the period. The elections declared the Republican and former President Donald Trump the winner by surpassing the threshold of 270 electoral colleges and obtaining 312 electoral colleges, while his opponent, Democrat Kamala Harris, won 226. The race, which was initially expected to be even, resulted in a resounding victory for the Republican Party in the 7 key states (Pennsylvania, Wisconsin, North Carolina, Nevada, Georgia, Michigan and Arizona).

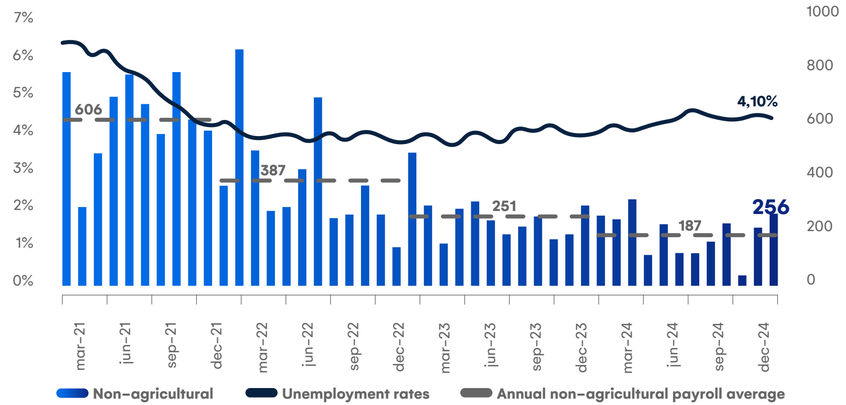


The victory of the Republican Party was also in Congress; in the Senate they have a majority as they have 53 of the 100 seats. While in the House of Representatives, Republicans have 220 seats and Democrats have 215, more than 218 representatives are required in the House to have a majority.

In this context, global equities end 2024 with strong valuations, mainly explained by the strength of the technology sector, in particular by companies related to Artificial Intelligence, microchips and semiconductors, where Nvidia was the company that stood out the most in the year and accumulated a valuation of 171%. With this, the Nasdaq index appreciated in 2024 by 25%, followed by the S&P500 (+24%).

Investors were watching the labor market as the Federal Reserve kept interest rates high to tame inflation. Employment showed a slight deterioration with an unemployment rate that went from 3.7% at the end of 2023 to 4.1% as of December 2024. The Federal Reserve, based on contractionary monetary policy and high interest rates, sought to reduce inflation, however, it ran the risk of generating a significant deterioration of the economy and thus affecting employment, which is why, during the year, the employment results that end the year with a scenario of relative tranquility for Fed members and investors were of vital relevance.

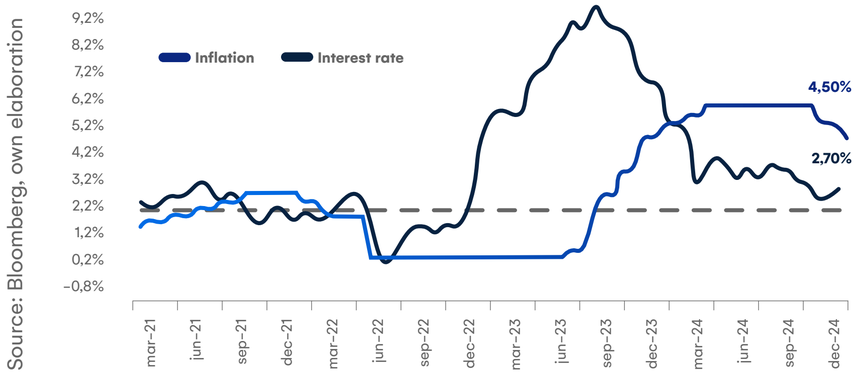
Nonfarm Job Creation and Unemployment Rate (United States)



Source: Bloomberg, own elaboration.

On the other hand, inflation in the United States ended 2023 at 3.4% and did not decreased below 3.0% until July. In November, inflation was 2.7% and is expected to close the year at 2.9%, showing that it is still persistent. With this, the Fed maintained a cautious stance for much of the year, keeping its interest rate stable in the range between 5.25% and 5.50% until the September meeting, in which it began its monetary policy normalization cycle, being the first cut in the interest rate in four years (they cut 50 bps). In addition, they made two cuts of 25 bps in the November and December meetings, with which the interest rate ended the year in the range between 4.25% and 4.50%.

Annual inflation and interest rate (United States)



Source: Bloomberg, own elaboration

In Europe, the dynamics were marked by political uncertainty and limited economic growth, registering little significant variations compared to what was observed quarterly in 2023 and remained below 1% throughout the year, which still reflects a complex outlook. In Germany, the breakup of the governing coalition led to an early call for general elections to be held in February 2025. Meanwhile, in France, the parliament's no-confidence motion against the prime minister, in a challenging political and fiscal scenario, further increased uncertainty.

VIGILADO SUPERINTENDENCIA FINANCIERA DE COLOMBIA

As for Eurozone inflation, it moderated by 70 bps from 2.90% YoY observed in December 2023 to 2.20% YoY in November, continuing its path of corrections. Given the behavior of inflation, the ECB began its monetary policy normalization cycle at the June meeting and made 4 cuts throughout the year, with a decrease of 100 bps.

Regarding China, the economy has failed to reach its 50% growth target, prompting the government to implement a series of fiscal and monetary stimulus packages to revive economic activity. This poor performance was especially affected by the crisis in the real estate sector, which continues to show no signs of recovery.

On the monetary policy front, the People's Bank of China (PBOC) kept its benchmark rates stable during the first half of the year until it decided to cut them by 10 bps in July, and in October it cut them by 25 bps, so that the prime rate on 1-year loans (LPRs) was reduced to 3.10% and the 5-year LPR was reduced to 3.60%. These movements are in line with the series of announcements made by the government of stimuli to boost the economy. Looking ahead to the coming months, there could be further cuts to boost economic activity.

As for commodities, they showed a mixed behavior during 2024. The valuations are led by coffee (69.8%), gas (44.5%), gold (27.2%) and silver (21.5%), while the devaluations were led by soybeans (-22.1%), iron (-20.2%), cotton (-15.6%) and wheat (-12.2%).

Commodity	Units	2023	2024
WTI	$US/oz	-10,7%	0,1%
Brent	$US/oz	-10,3%	-3,1%
Aluminum	$US/lb	0,3%	7,0%
Copper	$US/tm	22%	2,4%
Gold	$US/tm	131%	27,2%
Iron	$US/bp	13,9%	-202%
Nickel	$US/bp	-447%	-7,7%
Silver	$US/bu	-0,7%	21,5%
Coffee	$US/oz	12,6%	698%
Corn	$US/tm	-305%	-2,7%
Cotton	$US/lb	-2,8%	-15,6%
Soybean	$US/bu	-148%	-221%
Sugar	$US/lb	2,7%	-6,4%
Wheat	$US/lb	-20,7%	-122%
Gas	$US/bu	-43,8%	44,5%

Source: Bloomberg, own elaboration.

With coffee and other agricultural products such as cacao, these presented a good dynamic and traded at or near historical highs, this favored in particular the exporting countries of these products, such as Colombia, which contributed to a good dynamic of the primary sector.

On the other hand, benchmark oil F Brent and WTI showed little variation. This was the result of a de-escalation of tensions in the conflict in the Middle East, which resulted in crude oil supply remaining stable, in addition to concerns of weaker global demand due to economic dynamics in China and the gradual lifting of production cuts by OPEC+ countries.






VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Local Context

lThe balance for the country in 2024 was bittersweet. On the one hand, inflation continued its path of corrections, which allowed the Central Bank to move forward with the normalization of monetary policy.

This scenario favored the recovery of some sectors and contributed to the economy growing at a higher rate than in 2023. However, political and economic uncertainty was constant, compounded by concerns related to the country's fiscal outlook.

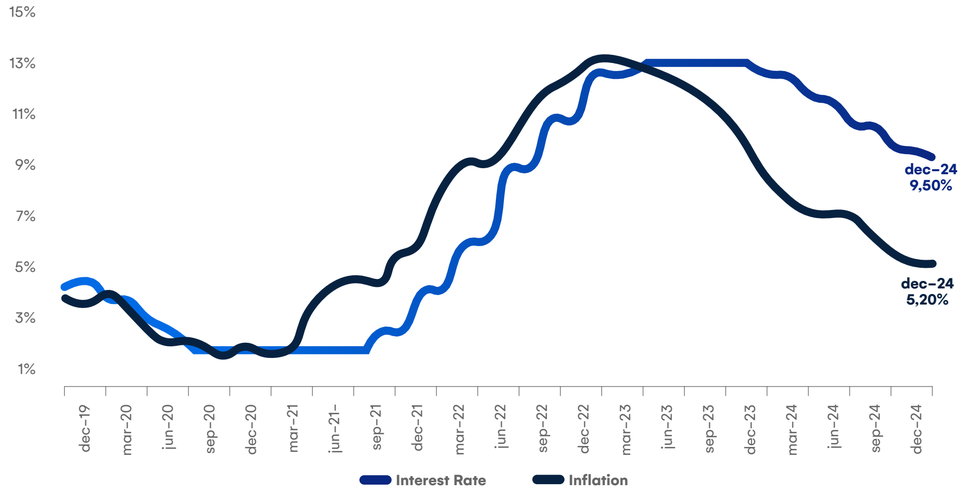
The economy grew 0.6% in 2023, showing a slowdown with greater effects on the construction sector (–4.1%) and industry (–3.6%) due to the moderation of dynamics due to the increase in interest rates, which limited household spending and reduced business investment. During 2024, economic activity has continued to grow, but at a moderate pace, from Occieconómicas we estimated that growth in 2024 would be between 1.6% and 1.8%, mainly explained by a better dynamic of the agricultural sector (7.8%), which has been one of the main drivers of economic activity and has registered the best dynamics in 20 years, and artistic activities (8.6%) which have rebounded especially in recent years due to virtual betting, however, concerns about the industrial sector continued which contracted for the second consecutive year (–2.4%) and the mining sector would present a variation of –3.3% due to the fall in oil and coal prices, in addition to lower coal production.

Annual inflation peaked at 13.3% in March 2023, as of that date, inflation in annual terms has moderated, closing 2023 at 9.3%. During 2024, prices continued to grow at a lower rate, closing the year with a variation of 5.2%, with a drop of 407 bps compared to the previous close.

The moderation in inflation is explained by a lower increase in prices in all divisions, particularly, the lines of goSDG and services that most influenced this dynamic were: i) Transportation: During 2023, a progressive series of increases in gasoline prices were made, which implied that the transportation item closed that year at 15.4%. In 2024 the increases in ACPM were moderate and their impact has not been significant, closing the year with a variation of 5.2%. ii) Food: The agricultural sector has been favored by moderate climatic phenomena, which has favored the production, distribution and marketing of food, with this, food inflation at the end of the year was 3.3%. iii) Rents and utilities: Rental prices have moderated, but gradually, limiting the accelerated correction of inflation, however, during the last few months, the special revision of utility rates in the Caribbean has supported the moderation of inflation.

In line with the moderation in inflation, the Central Bank cut interest rates during 2024 and accumulated an adjustment of 350 bps in the year, going from 13.00% at the end of 2023 to 9.50% by the end of 2024 and, in December, surprised the market by moderating the speed of adjustment closing the year with a decrease of 25 bps. Although inflation surprised to the downside during the second half of the year, Central Bank members opted for caution especially due to: i) inflationary risks derived from the depreciation of the exchange rate, ii) the persistence of fiscal uncertainty, and iii) the challenging international environment marked by the increase in risk premiums and expectations of restrictive financial conditions for longer time.

Inflation and BanRep Interest Rate



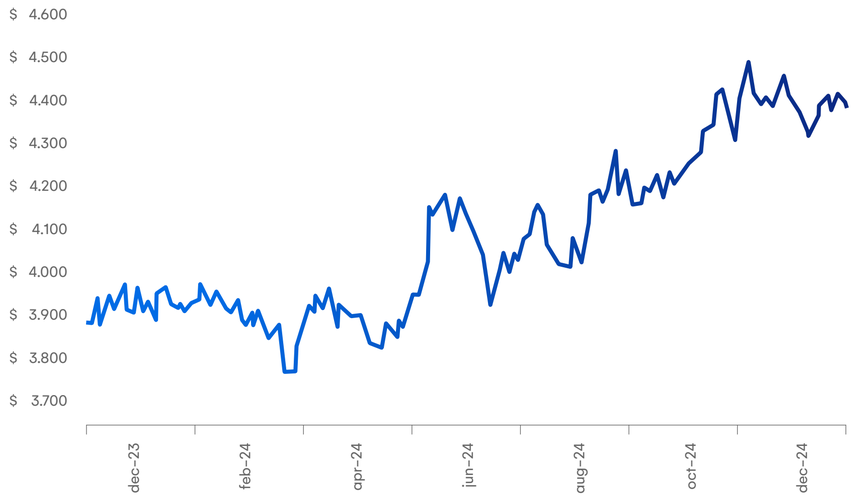
Source: Bloomberg, own elaboration

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Regarding the exchange rate, the dollar in Colombia maintained a lateral movement with an average closing of $3,900 during the first 5 months of 2024, which was mainly explained by: i) the flow of dollars from large taxpayers for the payment of taxes, ii) Nutresa's takeover bid and iii) the increase in oil prices. Then, the pair broke the psychological level of $4,000 to the upside in the middle of the year, mainly driven by the strengthening of the dollar worldwide as a result of the increase in geopolitical tensions in the Middle East, concerns of a possible economic slowdown in the United States and regional political uncertainty on account of the presidential elections in Mexico. Subsequently, in the second half of the year, the pair's movement was influenced by: i) political and fiscal uncertainty at the regional level, ii) expectations of contractionary international financial conditions for longer, iii) the elections in the United States and the implications of Trump's protectionist proposals, which reached a high during the year of $4,547 in November and closed the year at $4,405 with a year-average of $4,075.

Behavior of the Colombian peso against the dollar

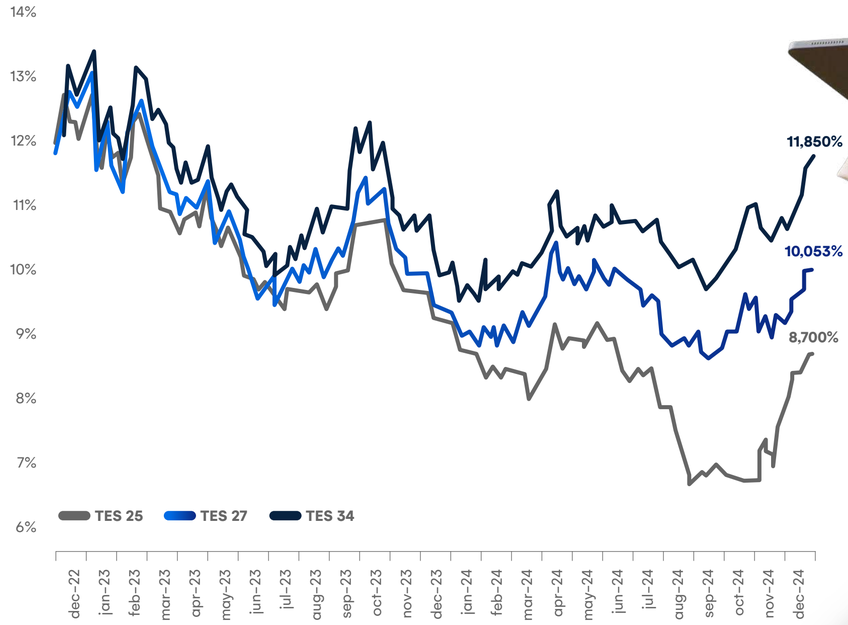
Source: Bloomberg, own elaboration.



During 2024, the TES TF curve presented a steep movement with valuations of the TES 2025 of 57 bps and the TES 2026 of 8 bps, due to the decrease in interest rates of the Bank of the Republic and the government debt swaps. The rest of the curve was devalued by an average of 168 bps, a movement driven by the TES 2050 that rose in rate by 241 bps. In turn, the Ministry of Finance placed 1.05 T in TES 2046, the new reference started in the market at a rate of 11.50% and closed the year trading at 12.78%. In this context, the difference between the TES 2025 and 2050 increased from 96 bps at the end of 2023 to 395 bps at the end of 2024. For their part, the UVR TES end the year with an average devaluation of 125 bps, except for the UVR 2025 TES that are trading at 1.6% with a valuation of 170 bps.

TES TF yield curve behavior

Source: SEN, own elaboration





VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Generating Profitable and Sustainable Growth

SDG 8.3; 9.3

We are focused on maintaining economic growth that is simultaneously sustainable and profitable, by contributing to the creation of value for our shareholders, our customers; generation of well-being for our employees and their families; and the economic progress of the country.

At the Finance and Strategy Vice Presidency, we have the great responsibility of protecting the Bank's assets and equity, as well as our clients' deposits, and we contribute to their growth through adequate financial and tax planning that generates value, which is distributed in a socially responsible manner to generate value for our stakeholders.

We have the great responsibility of **protecting the Bank's assets and equity,** as well as our **clients' deposits**

Economic value generated and distributed

| GRI 201-1 |

Item	2022	2023	2024
Direct economic value generated: revenue	$ 2.703	$ 3.187	$3.573
Net interest margin	$ 2.019	$1.991	$2.095
Other ordinary income	$ 494	$ 1.016	$1.322
Net fees	$ 189	$ 174	$156
Release of retained earnings	$1	$ 6	-
Distributed direct economic value	$ 1.856	$ 1.850	$2.129
Suppliers	$ 518	$ 609	$713
Shareholders	$ 251	$ 215	$249*
Direct employees	$ 435	$ 492	$523
Taxes and contributions	$ 488	$ 363	$455
Investments to improve customer service	$138	$163	$185
Donations and Advance Conditional Donation CTIC Foundation *	$ 26	$ 8	$4
Provisions, depreciation and amortization	$ 595	$ 1.116	$1.198
Reserves	$ 253	$ 222	$246*
Retained economic value	$ 848	$ 1.338	$1.444

(Figures in billions of pesos B)

We guarantee our shareholders clear and timely information, allowing them to make informed decisions and protect their interests within a framework of regulatory compliance, in addition, our financial management benefits our employees, ensuring them fair and timely compensation, which promotes their well-being and that of their families.

Similarly, we support social welfare through donations to the CTIC Foundation (Luis Carlos Sarmiento Angulo Cancer Treatment and Research Center) contributing to the fight against cancer.



Source: Banco de Occidente

* Profit distribution project to be presented for consideration by the General Shareholders Assembly.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FILIGRANA

Bank Changes and Results

We closed 2024 with an annual growth of 13.75% in total Assets, which grew by $8.73 trillion compared to December 2023, and reached a total balance of $72.65 trillion. The increase was mainly based on the growth of total Investment Financial Assets and Trading Derivatives, which reached the sum of $16.11 trillion, with a growth of 49.2% compared to the previous year, as a result of the execution carried out in Investments in debt securities where a year-year growth of 142.8% was evidenced with a positive variation of $4.87 trillion.

This was followed by the growth of the Legal and Foreign Currency Gross Credit Portfolio (excluding Repos and Interbanks), which increased by $3.76 trillion compared to the balance recorded in December 2023, equivalent to an annual increase of 8.6% and which contributed 43.1% of the growth in total Assets.

According to the latest information available from the Finance Superintendence of Colombia, as of December 2024, Banco de Occidente has a market share of 7.23% in the total portfolio, (higher by 30bps from Dec-23). By type of portfolio, the Bank's commercial portfolio closed at $33.6T, which represented an annual variation of 7.5% or $2.34 trillion, and with a market share of 9.26% (higher by 17bps from Dec-23).

The consumer portfolio records an annual variation of $711.915 B, equivalent to an annual increase of 5.8%, and a market share of 6.78% as of December 2024, 60bps higher than Dec-23. Finally, the housing portfolio (Mortgage and Leasing) registered a year-on-year growth of 18.5% and an annual variation of $479.271 B, the results are attributed to the good performance of the commercial force to promote the placement of credit products in the market.

The Credit Portfolio rated at C, D and E, registered a total balance of $3.17T, which represents 6.48% of the total gross legal and foreign currency credit portfolio and an annual variation of 10.01%. This behavior is mainly explained by the cyclical effects on the bank's customers associated with the country's economic behavior in which there has been an economic slowdown, inflation levels above the target range of the Bank of the Republic and the levels of interest rates in the Colombian market. The impact has been mainly concentrated in the consumer portfolio.

On the side of total liabilities, our Bank closed 2024 with a balance of $67.17T, registering a variation of $8.42T more than the balance at the end of the immediately previous year, which is equivalent to an annual percentage increase of 14.3%.

Within the behavior of Total Liabilities, the performance presented in total deposits at the end of December 31, 2024 stands out, which reached the sum of $48.18T, increasing by $3.20T compared to December 2023; which represents an annual percentage growth of 7.1%. This behavior is mainly explained by the evolution of savings accounts, which registered the sum of $23.69T with a growth of $4.16T compared to the same period of the previous year, equivalent to an annual percentage growth of 17.6%. Savings, checking accounts and CDTs represent 57.8%, 14.0% and 28.1% of the Bank's total deposits, respectively. This accelerated growth of savings products is mainly explained by the Bank's growth funding strategy in compliance with the different liquidity indicators (in particular CFEN) and the search to optimize the cost of funds.

According to the latest information available from the Finance Superintendence of Colombia as of December 2024, we have a market share of 7.16% in total deposits (higher by 2bps from Dec-23). By type of deposits, savings accounts have a market share of 9.02%, an annual variation of $4.16T. Checking accounts registered an annual variation of $192.885B, equivalent to an annual growth of 2.95% and a market share of 8.72% as of December



2024. Finally, CDTs recorded a market share of 4.72% (lower by 69bps from Dec-23). These results are in line with the national situation and corporate strategy.

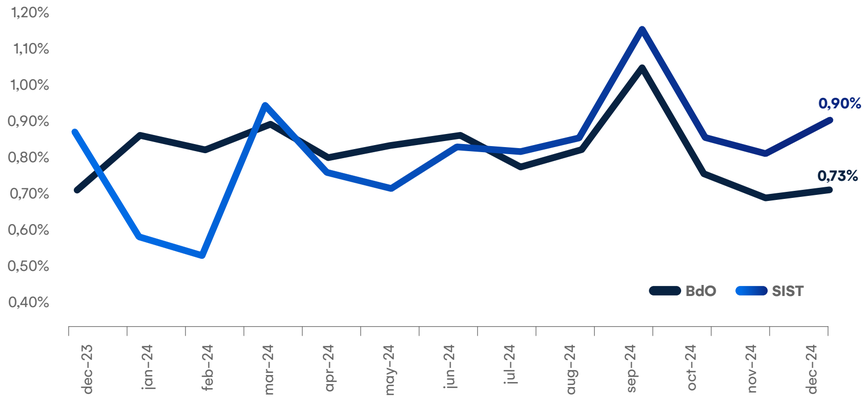
In relation to the other sources of funding, it is worth mentioning the growth corresponding to the Interbank and Overnight Funds where the closing balance reached the value of $8.63T with a year-year growth of 96.15%. On the other hand, the behavior presented by bonds is the result of the maturities of issues presented so far this year; as of December 31, 2024, the balance of bonds issued by the Bank was $2.67T, reflecting an annual growth of 22.97%. Currently, the current balance in bonds has maturities close to 8 years on average.

Our Bank's total equity was $5.48T, up $0.30T year-to-year, representing an annual growth of 5.99%. This result corresponds mainly to the increase in the equity reserve by $0.22T, explained by the withholding of profits for the 2023 period and the results for the 2024 financial year.

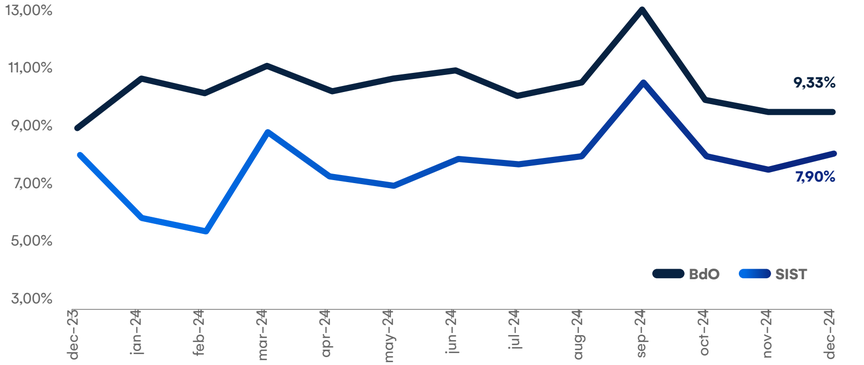
Our total net income at the end of December 2024 was $494.992B, which represents a variation of 14.95% compared to the result of the immediately previous year, mainly explained by the following events:

- **Annual growth of 5.24%** in net interest income and valuation, equivalent to $104.402 billion. The movement is mainly explained by a decrease in interest paid for $302.211B, which represents a variation of -5.66% compared to 2023; partially offset by a decrease in interest received of $245.514B, which represents a variation of -3.55% compared to 2023.
- **Portfolio provision and interest receivable expense increased by $1.350B,** growing in the order of 6.77%, mainly represented by the consumer portfolio modality, especially in products such as personal loans.
- **Increase in the Bank's general administrative expenses by 9.57%** represented by $91.303B, justified by the increase in the Bank's operation, together with expenses indexed to macroeconomic variables.

ROAA (Cumulative)



ROAE (Cumulative)



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

In this way, the results presented allow us to maintain the profitability indicators within the Bank's expectations. Thus, **the Annual Return on Total Assets in December 2024 was 0.73% and the Annual Return on Equity was 9.33%.**

At the consolidated results level, at the end of 2024 total Assets reached a total of $78.40T, up $9.79T since the end of 2023. The increase was based on the growth of investments in debt securities, which was the result of the strategies associated with the increase in placements by both the parent company and affiliates.

Regarding Total Liabilities, at the end of 2024 they stood at $72.41T, representing a growth of 15.10% compared to the end of 2023, in response to the funding needs of our commercial operations. Total consolidated equity at the end of 2024 was $5.98T, up by $297.707B compared to the end of 2023.

Consolidated net income was $481.048B with a growth of 0.31% compared to 2023. The increase was mainly based on the growth of Net Other Income, which reached the sum of $770.495 B, with a growth of 63.67% compared to the previous year, mainly as a result of the net gain by difference in exchange where a year-on-year growth of $213.794 B was evidenced. The foregoing, followed by the 4.06% year-on-year variation in Net Interest Income and Valuation, equivalent to $90.756B, broken down between Interest Received on Credit Portfolio and Leasing Operations and Interest Expense on Deposits.

There was a variation of -4.54% compared to 2023 of Interest and Similar Expenses, represented in $249.412B, mainly explained by the variation in the component of Interest Expense on Deposits, which registered a year-on-year variation of -7.36%, as a result of the decrease in the volume of fundraising and monetary pressures that do not favor savings, the increase compared to the end of 2023 by 6.12% of Financial Obligations is also noteworthy, which is equivalent to a variation of $70.297B.

The Other Net Expenditure item registered an increase of $182.031 B compared to 2023, which translates into a variation of 8.91%, in the breakdown of the variation, the increases in Personnel Expenditure of 9.42%, Depreciation and Amortization Expense (12.37%) and the increase in General Administration Expenses (9.79%) stand out.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Liquidity and Solvency Behavior

In terms of the solvency indicator, during 2024 we continued with the analysis and development of different actions to strengthen the proactive management of its capital, managing to maintain an adequate level for compliance with regulatory indicators and internal risk appetite. The foregoing, within the framework of a higher level of capital required due to the increase of 38 basis points in the capital conservation buffer that all entities in the system must meet, and which in 2024 completed the transition period granted in accordance with the provisions of Article 13 of Decree 1477 of August 2018.

Thus, at the end of 2024 we reached a total solvency indicator of 12.70%, which meant an increase of 95 basis points compared to the end of 2023, as a result of (i) the strengthening of regulatory capital through the issuance of subordinated bonds abroad worth USD 175 million, (ii) the internal generation of capital through profits, (iii) the permanent monitoring of assets weighted by credit risk level, and (iv) management of market and operational risk.

As relevant information, it is necessary to mention that we have been identified and declared a Systemically Important Entity — EIS for 2025, in accordance with resolution 2629 of 2024 of the Finance Superintendence of Colombia — SFC. The status of an EIS requires the Bank to build an additional capital buffer equivalent to 1.0% of its assets weighted by credit, market and operational risk. To this end, the SFC granted a transition period to implement the new capital buffer in four stages as follows:

1 First stage: **30% of the buffer** before June 30, 2025.

2 Second stage: **additional 30%** before November 15, 2025.

3 Third stage: **additional 20%** before May 31, 2026.

4 Fourth stage: **additional 20%** before November 15, 2026.

Affiliates and main associates

Banco de Occidente (Panama) S.A. is an entity organized and incorporated in accordance with the laws of the Republic of Panama. It began operations on June 30, 1982, under the protection of an International License, granted by the Superintendence of Banks of the Republic of Panama, through Resolution No. 9-82 of March 16, 1982. Additionally, it has a brokerage house license granted by the Superintendence of the Securities Market through Resolution No. SMV-435-2024 of December 31, 2024 (in the pre-operational period). Currently, it has assets of $4,483,099,262,655.65, liabilities of $4,144,357,085,796.67, operating income of $281,981,452,683.51 and expenses of $218,968,876,817.13.

The affiliate presented its operating results in general terms as follows:

The portfolio generated a significant variation, going from USD 552 million in 2023 to USD 546 million in 2024, for a decrease of -1% in balances. This represented in revenues, an increase of 35% compared to the previous year's growth of 96%; a decrease is observed, impacted by the decreases in the FED rate.

In terms of its investments, it obtained an increase in investments of 14% from USD 261 million to USD 297 million, as a result of the purchase of securities due to the behavior of the market.

For liquidity purposes, it increased by 49% from USD 117 million to USD 173 million. This is justified by the decrease in the portfolio and the increase in term deposits.

Term deposit balances increased 17%, from USD 661 million to USD 775 million. On the other hand, the interest generated increased as a result of the increase in balances from USD 27 million to USD 39 million in interest paid.

In 2024, there was an increase in portfolio provisions of 1327%, justified by adjustments in risk models.

Net Income for the year increased by 19%, closing 2024 with USD 15.3 MM.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. PANAMÁ

Affiliate Occidental Bank (Barbados) Ltd.

Occidental Bank (Barbados) Ltd. was incorporated pursuant to the laws of Barbados on May 16, 1991 and is licensed to conduct banking and trust business from and within Barbados. The Bank's registered office is at Chelsea House, Chelsea Road, St. Michael, Barbados. The Bank is a wholly-owned subsidiary of Banco de Occidente S.A. It currently has total assets of $1,486,252,493,384.22, liabilities of $1,292,655,885,361.05, operating income of $82,663,888,943.26 and expenses of $61,833,282,341.31.

The subsidiary presented its operating results in general terms as follows:

- **The Portfolio presented an increase of USD 30 MM,** which is equivalent to a growth of 22%. This represented an increase of 27% in revenues, which compared to the previous year's growth of 42%, a decrease is observed, this impacted by the decreases in the FED's rate.
- **In terms of its Investments, it obtained an increase in the portfolio of 18** that is equivalent to USD 16.3 MM, mainly associated with securities maturities during the year.
- **For liquidity purposes, this increased by 40%,** which is equivalent to USD 16.4 million. This increase is mainly due to the increase in both term and demand deposits.
- **Term deposit balances increased by 31%,** which is equivalent to USD 49.9 million. The behavior of these deposits represented an increase of 134% in spending, due to the growth of term deposits, it should be taken into account that there was a significant drop in the cost of funding.
- **Portfolio provisions increased by 200%,** associated in part with adjustments in risk models, due to the increase in the portfolio, especially in International Markets.
- **Net income for the year increased by 21%** closing at USD 5.2 million.

The business plans of the foreign affiliates are aligned with the business plans of the Parent Company, being a complement to the value offer for the Bank's customers. In 2024, the offshore entities generated joint profit above USD20 MM (USD 14.9 MM in Banco de Occidente Panama and USD 5.1MM in Occidental Bank Barbados), being the year with the highest historical result of the companies.

As a financial institution, we directly provide a wide variety of financial services to entities and individuals that operate or have their effect abroad. Among the main assets that generate income are portfolio placements, which can be in Colombia or in different parts of the world, treasury operations in fixed-income investment portfolios and liquidity operations through correspondent or short-term interbank banks. During 2024, no new products or services were developed in the affiliates. However, Banco de Occidente Panama received a brokerage house license on December 31 (in the pre-operational period) with which it expects to offer international investment funds to its clients starting in 2025, once the conditions to start the operation are met.

For the year 2024, there was no evidence of material effects on the affiliates in liquidity and solvency. The affiliates have presented strong indicators in recent years with solid financial results, successful cost-cutting strategies, strategic alignments with their parent company and strong long-term funding structures, among others, which help support the hypothesis that it is a going concern for the next twelve months.

Income from activities is not received on a seasonal, cyclical, or occasional basis. Income is stable at different times of the year and does not obey a particular period.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Fiduciaria de Occidente S.A — FiduOccidente

Fiduciaria de Occidente S.A. is a private company, incorporated by public deed number 2922 of September 30, 1991 of the Notary 13 of Bogotá, D.C., authorized by the Finance Superintendence of Colombia and whose main address is in the city of Bogotá D.C. — Colombia. Fiduciaria de Occidente S.A. is subordinate to Banco de Occidente S.A., whose controlling entity is Grupo Aval S.A.

The activity is aimed at the administration of trust businesses and investment funds, including private equity funds, in the corporate and personal markets and serves, respectively, the segments of: i) government, corporate, institutional and companies, and ii) individuals in certain segments, including preferential, elite and wealth management.

The fiduciary's strategic plan has been properly implemented, which is evidenced by the transformation that the organization has undergone in the last six years measured through the main strategic indicators. For example, at the end of 2024, we obtained a growth in commissions of 16%, compared to 2023; customer satisfaction measured by the Net Promoter Score (NPS) was 72.5%, exceeding 60% for the fourth year.

In addition, the work environment index measured by Great Place to Work grew to 85%. These results are the reflection of collaborative work at the different levels of the organization and supported by its strategic pillars, for which we have obtained various recognitions, among which the following stand out:

- ✓ **In 2024 we were awarded at the Prixtar** awards highlighting our responsible and transparent management in two of the collective investment funds.
- ✓ **That same year, we obtained the Great Place to Work certification,** certification for the fourth consecutive year, certifying us as a VERY OUTSTANDING place to work in Colombia.
- ✓ **Similarly, in 2024 we ratified our environmental commitment** and sustainable growth by obtaining the carbon neutrality certification granted by ICONTEC.

The corporate purpose of the Company is the execution of commercial trust agreements and non-transferable fiduciary mandates of ownership, in accordance with legal provisions. Its fundamental purpose is to make all kinds of commercial trust or trust contracts; receiving trust accounts; managing and investing their assets, in such a way that they generate the best possible returns; acting as a representative or agent of interests of third parties for any purpose; being an administrator, also on behalf of third parties, of all kinds of assets and investments; acting as a representative of holders of bonds or any other class of securities that have been the subject of serial or mass issuances; managing guarantees constituted by third parties; managing the collective investment funds that are authorized, including private equity funds, and entering into all other operations and/or contracts permitted to trust companies.

FiduOccidente is currently one of the leading fiduciaries in the sector by size in terms of assets under management, with a value close to $50T, we generated a net profit of $88.189B, 17.7% higher than that obtained in 2023, and, additionally, Fitch Ratings reaffirmed our investment management quality rating in excellent stable outlook, which is evidence of our commitment to a solid and transparent management of our clients' resources.

Likewise, FiduOccidente has the authorization of the Finance Superintendence of Colombia to distribute the products of Banco de Occidente Panama and Occidental Bank Barbados, which complements its value proposition with international instruments.

In 2024, three new funds were launched: 2 Alternative Fixed Term FICs (V and VI), with a duration of 12 months and 6 months respectively, whose objective is to offer clients investment opportunities taking advantage of market conditions in local fixed income, which reached an AUM of $116 B; the Invest+ FIC as an alternative for the retention of customer funds in the government, business and corporate segments, which closed with an AUM of more than $160 B. Additionally, the Occirenta FIC was restructured, with the creation of two new types of participation to meet the value proposition of the select and Aval segments and the FIC Occitesoros to serve potential clients of the official sector.

On the Private Equity Funds (FCP) side, the FCP CIEB II, infrastructure fund, began operations; the acceptance of offers for the structuring of 3 new funds was achieved and the structuring of another 4 began. In this FCP line at the end of December 2024, a value of resources under management of $5.8T was reached, which meant a growth of $610.250 B, 12% compared to the same period of the previous year.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Additionally, as part of our Innovation and Transformation strategy, the commitment of the People Digital Transformation Cell was strengthened with the evolutions implemented in the digital people engagement tool, with which the participation of digitally onboarded customers increased from 77% to 92% at the end of the year. On the other hand, a pilot of customer referencing to the fiduciary's FICs with Metrocuadrado and the digital wallet Dale! was initiated, making us the only fiduciary of the group to establish an alliance with these two entities. Finally, during 2024, the milestone of being the first trust company to allow the digital onboarding of investors to private equity funds in the FCP Dalval was achieved.

On the Digital Transformation of Companies front, the first digital onboarding flow was developed for Collective Investment Funds for Legal Entities of all segments: Companies 1, Companies 2, Corporate, Institutional and Government. In this regard, we became the first trust company to digitize this process in the market.

With this new tool, it was possible to reach assets under management of $93.5 billion pesos in 371 onboarded customers and closes the year with 54% of December customers digitally onboarded. Through the tool, it was also possible to reduce onboarding times by 80% in digital processes. By onboarding digital customers, we have managed to complete the process and the generation of the investment in an estimated average time between 4 hours and one business day.

Income from activities is not received on a seasonal, cyclical, or occasional basis. Income is permanent at different times of the year, with some fluctuations that depend on the behavior of the financial markets and do not obey a particular period.

The affiliate Fiduciaria de Occidente S.A. presented the results of its operation in general terms under the following milestones:



- ✓ It currently has **total assets of $478,685,146,390.60,** liabilities of $38,812,040,800.08, operating income of $225,263,947,869.72 and expenses of $137,101,113,537.71.
- ✓ **Equity increased by 9.8%** between December 2023 and December 2024, which is equivalent to an increase of $39.412B from $400.483B in 2023 to $439.895B in 2024, a variation that is concentrated in the 17.0% increase in profit of previous years that increased by $27.439B and in the 17.7% increase in profit of the year that increased by $13.256B.
- ✓ **Profit before taxes increased by $15.547B (+18.0%)** from $86.455B in 2023 to $102.002B in 2024 and net income increased by $13.256B (+17.7%) from $74.933B in 2023 to $88.189B in 2024.

The Fiduciary does not present material changes in its liquidity and solvency situation, since liquid investments plus available investments remain at adequate levels; for the years 2023 and 2024 they reached $88.545B and $85.023B respectively. As for the solvency margin, double-digit indicators are maintained for the end of 2023 and 2024 with values of 73.6% and 28.3% respectively, which are well above the minimum regulatory level (9%), the decrease is due to the implementation of decree 175 of 2022, which increases deductions to technical equity exceeding $200B, arising from capital investments, deferred tax assets and acquisition of intangibles. No trends, events or uncertainties are identified that have the capacity to materially impact the fiduciary's operations, its financial position or changes in its financial position.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A.

Ventas y Servicios S.A. – NEXA BPO

Ventas y Servicios S.A. — NEXA BPO is a commercial services company that provides contact center and BPO services nationwide to entities from different sectors of the economy. It is a corporation, supervised by the Superintendence of Companies with domicile in Bogotá, Colombia. It has more than 7,200 employees and operates in 13 cities in the country.

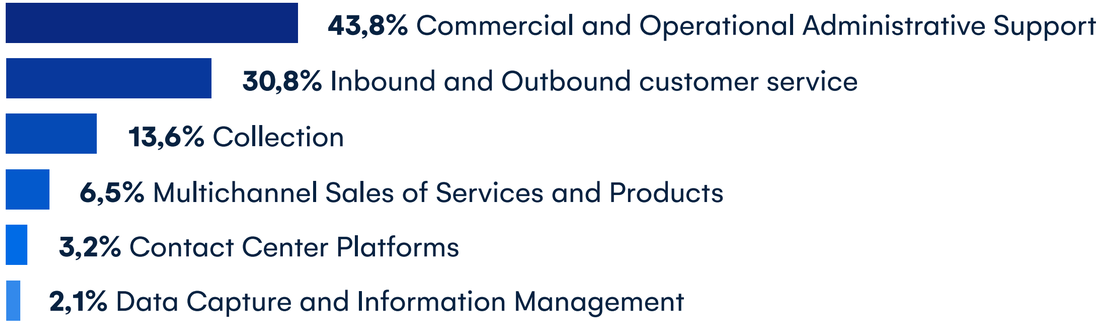
The corporate purpose of the Company is the provision of technical or administrative services referred to in Article Five of Law 45 of 1990, such as: Computer programming, marketing, the creation and organization of consultation files and the performance of statistical calculations and reports in general.

Nexa BPO is an expert in customer experience management and provides BPO Contact Center solutions. It creates experience models with customers, by enabling secure environments that build trust, add value to their customers' businesses, and humanize interactions.

The strategic plan focuses on 4 fronts with 9 strategic objectives and is focused on maturing our service offer towards the market, while diversifying the client portfolio beyond our natural market within the business group to which we belong and the traditional industries served by the sector. The focus for 2025 will be on the growth of billing in new and current customers with a special focus on competitive margins. It currently has total assets of $116,912,441,158.62, liabilities of $65,601,934,953.00, operating income of $354,995,851,700.34 and expenses of $352,747,318,391.83.

The company maintains its position within the industry in a competitive market that grew by 8% by 2023, projected at 5% by 2024, with a notable growth in foreign investment and service export processes that reach a growth of 386% in the last 10 years, despite its decrease in 2023. Likewise, the growing adoption of new technologies and the need of customers for the search for differentials and operational optimizations focused on self-management and asynchronous digital tools are highlighted. Nexa is the seventh largest in the industry nationwide.

The company's services are distributed as follows:



The strategic and technological transformation that the market demands of us has led us to increase our efforts in tools based on technology and artificial intelligence that optimize our clients' processes and internal processes, therefore, they become one of the most important supports to achieve our clients' goals and our own. With a view to transforming the company's value proposition, work continues on the progress of the MEGA 2026 strategic plan. This plan consists of 9 strategic objectives in management.

The affiliate Ventas y Servicios S.A. — NEXA BPO presented its operating results in general terms as follows:

- ✓ **NEXA's sales grew 19.7%** compared to 2023, closing at $352.482 B.
- ✓ **Fixed Costs decreased by 2.2%** compared to 2023, closing 2024 at $39.91B.
- ✓ **Operating cost increased 0.62 percentage points** compared to 2023, remaining at $306.716 B for 2024.
- ✓ **In 2024, net income closed at $2.226 B,** compared to a loss of $372 million in 2023.

As of December 31, 2024, Corporación Financiera Colombiana S.A. presented Assets of $26.94T, which in percentage terms represented an annual growth of 0.79%. It obtained an annual profit of $327.654B with an annual decrease of 59.50% compared to the profit of the year 2023.

At the end of this year, the associate Porvenir S.A. recorded a total of assets of $4.03T, reaching an annual growth of 13.81%. Profit as of December 31, 2024 was $652.6B, growing by 16.8% compared to December 2023.

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Transactions carried out after the balance sheet

For the financial statements presented as of December 31, 2024, no off-balance sheet transactions are presented, all economic events have been recognized in accordance with accounting legislation and were subject to the reviews performed by the Bank's internal audit and the tax auditor KPMG.

After the end of the financial year

It is specified that there have been no significant external or internal events that could affect the normal conduct of the Bank's operations and results from the closing of the balance sheet to the date of this report.

Free circulation of invoices

In compliance with the provisions of Law 1231 of 2008 and added with Law 1676 of 2013, the Bank informs that it has no practices of withholding invoices from our suppliers, with the definition of internal policies to ensure the free circulation of invoices issued by vendors or suppliers.

Material transactions with related parties

To carry out transactions with related parties, we have procedures related to the MAN-COL-431 procedures manual, which establishes that operations carried out with customers classified as tied or related parties must have the approval of the Bank's Board of Directors, for which there is a consultation list that allows the areas in charge to identify when a customer is part of this list. In addition, a monthly control is carried out on these operations to validate that the new active operations with tied and related parties have the due approval by the Board of Directors.

The details of these transactions are disclosed in note 28 of the separate FS and note 30 of the Consolidated FS.

Relationship between the Bank and its Subordinates

Below is the amount of the transactions carried out between the Bank and its subordinates, which are included in the 2024 balance sheet and income statement.

Accounts	Banco de Occidente Panama	Fiduciaria de Occidente	Occidental Bank Barbados	Ventas y Servicios -Nexa Bpo	Grupo Aval
Total Assets	322.088	431.649	183.575	23.080	124.959
Total Liabilities	-	3.449	-	10.676	132.797
Total Revenue	1.335	2.202	1.459	22	11.226
Total Expenditures	-	9.415	-	108.224	85.589

Transactions with Shareholders and Directors

As of December 31, 2024, we had loans granted to executives for $8.893B, basically supported by credit operations for the acquisition of housing, vehicle and personal loan, according to the conditions stipulated by the Bank for its employees. The only shareholder of the bank with a stake greater than 10% is Grupo Aval Acciones y Valores S.A, which has a credit card and an ordinary calendar portfolio.

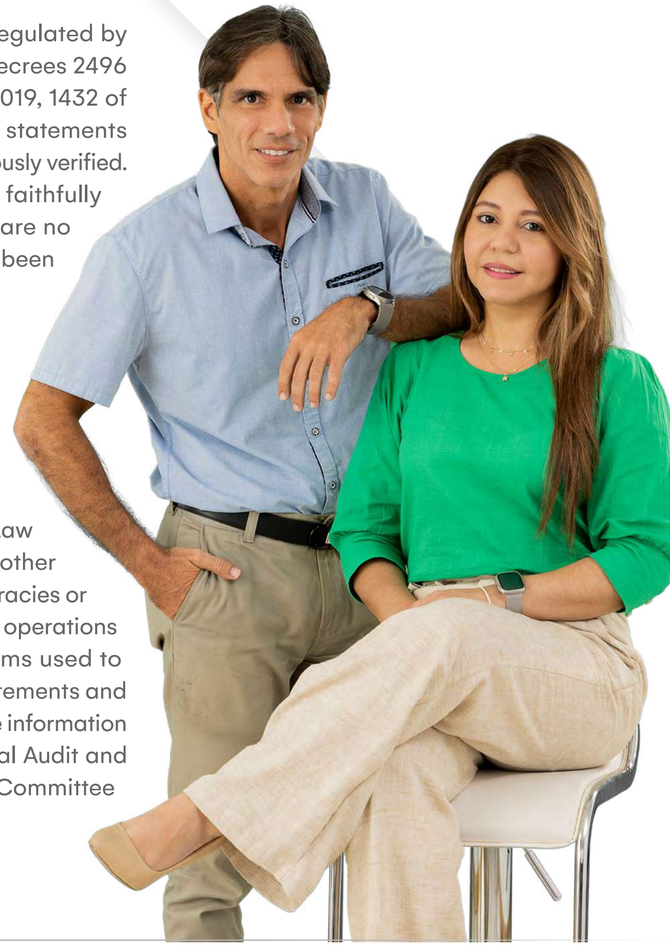
Year 2024	Individuals with control over Banco de Occidente	Key management Personnel	Companies that belong to the same group	Associates and joint ventures	Entities that are controlled by persons included in category 1 and 2	Entities that have significant influence over persons included in category 1 and 2
Assets	15	9.009	655.714	226.516	607.585	3.297
Liabilities	8.136	20.537	1.477.078	35.612	459.281	3.510
Revenue	6	92	101.870	75.346	119.848	503
Expenses	805	2.045	265.883	78.955	42.020	4

Controls and procedures used for financial reporting

In accordance with the provisions of Law 1314 of 2009, regulated by the Single Regulatory Decree 2420 of 2015, amended by Decrees 2496 of 2015, 2131 of 2016, 2170 of 2017, 2483 of 2018, 2270 of 2019, 1432 of 2020, 938 of 2021 and 1611 of 2022, it is certified that the statements contained in the Bank's financial statements have been previously verified. presented as of December 31, 2024, that they have been faithfully taken from the Company's accounting books, that there are no omissions of information and that all economic facts have been recognized therein.

Disclosure of financial information

EIn compliance with the provisions of Articles 46 and 47 of Law 964 of 2005, we certify that the financial statements and other relevant reports for the public do not contain defects, inaccuracies or errors that prevent knowing the true financial position or the operations carried out. In addition, the disclosure and control systems used to incorporate the information contained in such financial statements and relevant reports to the public are adequate, based on reliable information and subject to the reviews performed by the Bank's Internal Audit and the Tax Auditor KPMG, under the supervision of the Audit Committee of the Board of Directors.



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Certification issued by the tax auditor

Please refer to page 1 of Annex I and page 1 of Annex II, corresponding to the reports of the tax auditor to the Separate and Consolidated FS.



Risk Rating

Locally: at the end of this year, we maintained for the twenty-seventh consecutive year the triple AAA rating, the highest credit rating for long-term debt and BRC1+, the highest certainty of payment for short-term debt granted by BRC Standard & Poor's. We also have the highest national rating for long-term debt AAA (Col) with a Stable outlook and F1+ (Col) for short-term debt given by Fitch Ratings.

International: according to the rating update granted by Fitch Ratings, its Long-Term rating at BB+ and Short-Term at B is maintained, based on the quality of our assets, business model, and maintaining modest profitability and capital metrics.

Relevant Facts

Business Banking Results

Below, we share the most relevant events of our Vice Presidency of Companies during 2024, which leveraged the Bank's purpose of generating growth for companies and contributing to the sustainable transformation of the country.

- ✓ **Regarding the recommendation of our customers in Business Banking (NPS), we closed the year with 74%.** We remain at a world-class level, so we will continue to design strategies to achieve our goals and increase the level of recommendation in each of our segments.
- ✓ **We reached a figure of more than $32.6 T** in placement products, driven by an increase in business economic activation. We presented an annual growth of 8.32%, that is, $2.5 T with a budget compliance of 98.8%, achieving a market share of 9.26% as of December 27.
- ✓ **In deposits we achieved a growth of 11.08%,** with a marginal of $3.9T and an execution of 108.37% of the budget.
- ✓ **In terms of the foreign currency portfolio, we ranked second in Colombia with a share of 19.14%,** positioning ourselves as a comprehensive, close, agile and passionate financial option with presence in Panama and Barbados.
- ✓ **We obtained credit lines with correspondent banks for USD $150 MM** with a sustainable focus and use (environmental and social), contributing to our We Are Sustainable strategy and the growth of the portfolio in foreign currency.
- ✓ **We increased 20% in credit lines** with correspondent banks to leverage the growth of the portfolio in foreign currency.

We continue to work on strengthening the value propositions for the strategic segments:

- ✓ **In the Government segment we managed to obtain a share in the deposits of the General Accounting Office of the Nation** CGN of 20.90%, in checking account 20.69% occupying first place, in savings 20.95% and for CDT 4.50%, in addition we achieved a non-performing loan indicator of 0.45% and a customer recommendation level (NPS) of 75.9%.
- ✓ **In the Corporate, Medium and Institutional segment, we reached 17.80%** in placements as of September 2024. We managed to reach historic highs during the year of $15T in deposits and $12T in placements. We optimized the calculation of the Net Stable Funding Coefficient (CFEN) index.
- ✓ **We obtained the structuring and financing of important energy transition projects,** eamong which is the largest independent solar park in Colombia "Puerta de Oro". In addition, we went

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from 4th to 2nd place in customer service preference with respect to our value proposition and a customer recommendation level of 75% (NPS).

- ✓ **In the Business segment, we managed to maintain the 2nd position in our customers' wallets,** increasing participation by 66 bps and closing the gap with the leading bank. In addition, we continue to work on strengthening our value proposition with the realization of forums and diploma courses built based on the needs of customers in our Business Classroom, achieving more than 7,600 visits. We achieved an excellent result by increasing our customer recommendation level (NPS) from 67% to 77%.
- ✓ **In the SME segment, we reached a significant milestone by positioning ourselves as the leading bank in our customers' wallets,** surpassing the competition by a difference of $45 billion. We continue to strengthen the bond with our customers through the use of advanced analytics models and digital marketing campaigns. At the same time, we have strengthened our "Business Community" through forums, diploma courses, podcasts and networking events, impacting more than 9,400 companies and training more than 37,000 people. This has resulted in an increase in the level of recommendation (NPS), which went from 51% to 62%, increasing 11 basis points.

In the same way, and seeking to strengthen commercial management for our segments, we find the following achievements:

- ✓ **We carried out Kam Master training sessions for the Corporate and Business segments,** seeking to increase productivity, effectiveness and commercial well-being, achieving effective business for 643 B. Additionally, we carried out training sessions on Working Capital for SMEs.
- ✓ **We provided support in the structuring and definition of the new CASH business model** for the SME segment, impacting 46 cash management specialists and more than 140 SME relationship managers. The new structure aims to promote the sustainable growth of the operating deposits and commissions of the Vice-Presidency of Companies.
- ✓ **We achieved 85% in the indicators of final beneficiary data** and completeness of information of legal entity clients.
- ✓ **We carried out marketing campaigns for Cesantías Porvenir,** banking correspondents, Facilpass, CSI Renting, App OcciRed, territorial taxes, SME engagement, Your Business Community, company value proposition, Banco de las Empresas and the National Savings Fund, impacting more than 1.2 million people.
- ✓ **From the Maestros del Hacer platform, we deliver valuable information to our clients** so that they can make informed decisions, through face-to-face tax forums in the main cities of the country, with the expert Tulio Restrepo with attendance of more than 2,000 people.

Through the agile framework and its scaling, we are able to deliver advances to the sales force:

- ✓ **In Finagro Substitute Portfolio loans, we achieved disbursements of $3.31T,** occupying first place in the banks of Grupo AVAL with the use of these lines. We were recognized by Findeter for being a strategic ally, promoting the development of the drinking water and basic sanitation sector.
- ✓ **In revolving credit, we enabled the management of limit activation requests for our customers,** going from 2 days to 15 minutes.
- ✓ **We reaffirmed our participation in the leasing business** business with more than $ 78B in placements, through our agreements.
- ✓ **We reached the figure of 91 builder credit projects,** of which 23 were in the green builder loan modality for more than $ 844B.

To facilitate collections, payments, and in general transactions and the management of cash and investments to our clients, we launched new solutions and services through the following actions.

- ✓ **We provide our customers with the interoperable QR,** becoming a means of payment that leverages immediate collections.
- ✓ **We implemented new means of payment in the GOU gateway:** AVAL Button and Banking Correspondent. Changes were implemented in the Aval Pay Center portal to improve the user experience.



- **This year we successfully launched our new OcciRed App** migrating to more than 3,000 customers. We continue in the integration with FiduOccidente and the redesign of our portal for usability, ensuring that our users can quickly and securely generate their statements and certificates from the same portal.
- **We managed the evaluation and approval of 146 new special administrative services** (SAES) and 184 scopes/improvements to current services. Increasing the customer base to 258 with 901 services.
- **We automated payments through the Host to host (H2H) channel,** which has allowed us to increase Third-Party Payment transactions by 14%.
- **We increased correspondent coverage to more than 80 thousand service points** points throughout the country with our correspondents Efecty, Puntored, SuperGiros, Punto de pago, Éxito and EDEQ. Opening of the service in Farmatodo and Gane through Puntored.

Personal Banking Results

Below, we share the most relevant facts of the management of the Vice Presidency of Personal Banking during the year 2024, which leveraged the commitment in Personal Banking to the development of people, business growth and development of the country:

- **Growth in the consumer portfolio was achieved above the market,** at a rate of 5.8%. This dynamic allowed it to reach $12.80 T, achieving a marginal growth compared to 2023 of $703B. In Housing, the portfolio reached $3.00 T, which represented a growth of 18.7%.
- **In disbursements, one Trillion pesos exceeded for 2 consecutive months** (October and November). Reached $9.6T in consumer disbursements, which represented a growth of 12.8%.
- **The consumer non-performing loan index (ICV) stood at 4,02%** at the end of the year, below the sector that as of November 2024 stood at 7.19%.
- **Thanks to the implementation of the new decision engine model** and the participation in the management of recovery and provisions, the stabilization of the cost of risk in consumption was achieved.
- **The bank's portfolio remains aligned with the strategy of low-risk products:** Payroll loans $5.02T (33%), Personal Loans $3.44T (22%), Housing $3.03T (19%), Vehicles $2.47T (16%) and Credit Card $1.59T (10%).
- **At the deposit level, the year closed with $3.62T,** during 2024 commercial efforts were focused on promoting the use of dematerialized CDTs.
- **We are the first choice in the banking system for our clients** in the Core segments. As of December 2024, a debt share of 36.6% in Elite, 33% in Preferente Plus and 19.4% in Preferente was obtained.
- **Asset management was consolidated,** increasing productivity to 12%; in Housing, 3,956 operations were disbursed, representing $991 billion pesos, a 35% growth compared to 2023. In vehicles, 15,162 operations worth $1.4T were placed, growing by 26.3% compared to 2023.
- **A deployment was made in commercial models of deepening,** relationship, business centers and select, increasing productivity by 9%. This allowed to reach $2T of disbursements in Personal Loans.
- **The encapsulated Management model for the Payroll Loan product was worked on,** managing to disburse $2.6T throughout 2024, which translates into an increase of 46% compared to the previous year.
- **In Credit Card, $3.6T was invoiced** in 2024 and 58,000 Plastics were activated, growing by 8% compared to 2023.
- **We contributed to sustainability by disbursing Green Line loans,** both in Vehicles and in housing; placing 1,152 credits worth $120.141B in Hybrid and Electric Vehicles and 107 operations worth $28B in Sustainable Housing or with Green technologies
- **The objective of income from commissions in insurance was achieved,** contributing to the Bank's profitability around $126B with an over fulfillment of the expected 2024 goal of 103.0%, a result with important and outstanding

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performances in productivity of voluntary insurance placement in Payroll Loans with 84.0% penetration (best practice in the national industry) and Personal Loans with average penetrations above 186.0% in different sales channels and Mortgage Credit at 175.0%.

- **Through our digital channels, we continue to transform our customers' experience.** For the WhatsApp channel, different simulators were developed; such as housing which has already generated approvals for $900MM, opening of CDTs for a total of $2.3B and vehicle loans with approvals for more than $1B. In our Banking Portal, the new payment plan consultation functionality has benefited more than 194,000 customers, and it is expected to reach 196,000 thousand more. This improvement not only optimizes the customer experience, but also represents an estimated annual savings of $47MM in the Contact Center, due to a decrease in calls.
- **Our Mobile Banking App has been redesigned with a more intuitive and user-friendly interface,** allowing our customers to carry out their banking operations easily, comfortably and securely. The personalized service was implemented for the ELITE segment, with immediate attention and resolution in first contact of more than 95%.
- **At Banco de Occidente we are preparing for Banco de la República's Bre-B project** and with our Tag AVAL, we are redefining immediate payments. Our customers now enjoy fast, safe and secure transfers.



- **The launch of our 100% digital credit card-Occiflex** was carried out with approval without physical documents and immediate availability in mobile banking for use. This product will allow having a 50% discount in the category of commerce with which customers are expected to feel more comfortable with purchases in: e-commerce, restaurants, clothing, supermarkets, entertainment, hotels and airlines.
- **Our UNICEF Credit Card was selected as one of the winners** winners in the seventh version of recognition of good practices in Sustainable Development, standing out among more than 243 practices applied for this 2024, thanks to its innovation, impact, sustainability over time and relevance in the territory. With the 18,000 active plastics, more than $2.23B have been donated in the last three years, contributing to communities in La Guajira having access to drinking water, sanitation and hygiene practices.
- **Our Touch Card system in Credit and Debit Cards** (allowing users to easily identify cards through touch) was awarded by Fintech Americas, awarding Banco de Occidente gold in the Financial Innovators of the Americas Award, in the Customer Experience category.
- **A personal loan line was established to finance solar panels for individuals,** encouraging their placement through an alliance with Rocasol, a company specializing in solar panels.
- **The 100% digital self-managed savings account was launched,** opening without documents, in minutes, delivery of debit card (TD) at home, aimed at individual customers and non-customers. Management through service channels, transactional portal, digital marketing, own media and thanks to the digitization of different processes, efficiencies were obtained in the elimination of physical forms.
- **The Google Wallet was implemented in Mastercard Credit Cards (TC)** where the physical TC is not required to make payments, a faster and more secure process through the Android cell phone.

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Fiscal and Tax Management

| GRI 207-1; 207-2; 207-3; 207-4 |

With a clear commitment to boosting our country's economy, we actively contribute to the development of society through timely tax contribution.

This premise is evident in our Tax Policy[4], which reflects that our actions and the administration of tax matters are carried out with total transparency, clarity, order and coherence, always with a socially responsible vision of our stakeholders.

The Financial and Strategy Vice-Presidency is responsible for approving and modifying the organization's fiscal strategy, but it is the duty of all our Bank employees and other interested parties to ensure compliance with the Fiscal Policy within the framework of its principles[5] of: Ethics, integrity and good practices, transparency, clarity, coherence, prudence and legality.

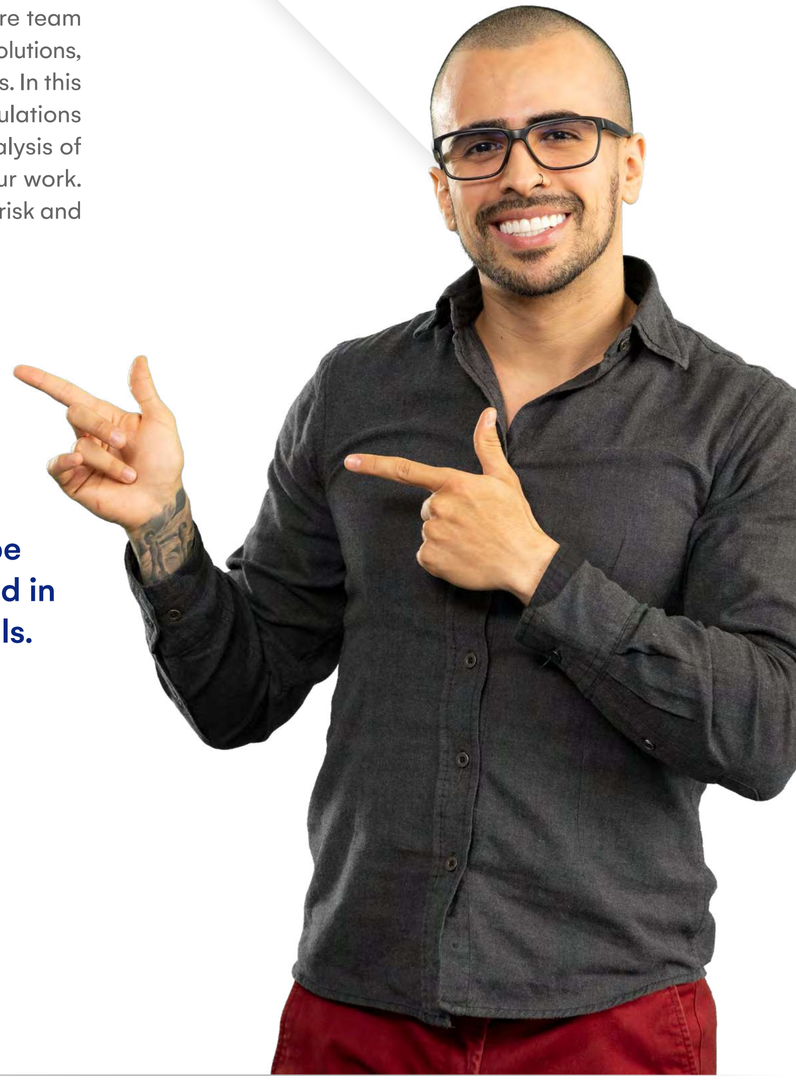
At the Bank, all typical and atypical transactions or economic events are analyzed in a comprehensive manner, committed to complying with all current regulations, complementing them with the tax impact that they may represent, as part of our business strategy to prevent risks such as tax evasion.

On the other hand, we have controls such as compliance with the SOX Act[6] and the Operational Risk Management System Committee (SARO), which allow us to further shield our operations and contribute to our fiscal governance. We also carry out an annual audit that evaluates compliance in our management through an external tax auditor. The latter, in turn, is responsible for reviewing the declarations and submits an annual audit report. The tax audit helps us to identify possible errors and validate the correction of these to comply with legal requirements.

In terms of the annual income tax return, we have external tax advisors for the verification of the information presented, where the evidence of all the cases of the review such as audit reports and income reports, among others, remain.

In addition, we strengthen our processes for tax compliance through the training we carry out with recognized national associations and institutions such as Asobancaria, the National Association of Entrepreneurs of Colombia (ANDI), the Colombian Institute of Tax Law (ICDT), among others. With these activities we seek to update our entire team on the current regulations, laws, decrees, resolutions, jurisprudence and doctrines that apply to us. In this way, we strive for due compliance with regulations with the use of good practices and the analysis of strategies that support the execution of our work. This allows us to minimize some type of tax risk and guarantee the optimal tax burden.

We also participate in meetings with all our stakeholders, where opinions and concerns are raised in tax matters, as well as the action plans to be followed, which are recorded in minutes or informative emails. In addition, we participate in the Tax Committee of Asobancaria that meets ordinarily 12 times a year.



[4] See heading, report of the financial statements, the accounting and fiscal policies of the Bank
[5] For more information, see the Responsible Investment Practices topic of this Report.
[6] The Sarbanes Oxley Act (SOX) regulates the financial reporting and auditing of publicly traded companies.

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Below is our tax information within the scope of the jurisdiction of this report:

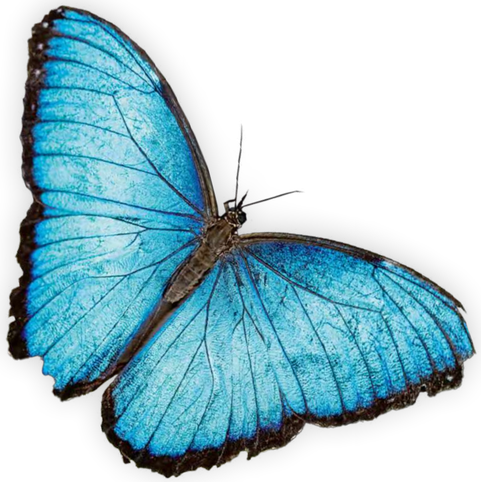


Figures in millions	2022	2023	2024
	COLOMBIA		
Name of resident entities	BANCO DE OCCIDENTE S.A.		
Main activities of the organization	Banking establishment		
Number of employees and details of this number	**7,113 employees distributed as follows:** 521 with a fixed-term contract, 6,262 with an indefinite term contract, 330 with a Sena apprenticeship contract. In addition, we had 2,387 employees in Outsourcing.	**6,984 employees distributed as follows:** 496 with a fixed-term contract, 6,143 with an indefinite term contract, 345 with a Sena apprenticeship contract. In addition, we have 2,438 employees in Outsourcing.	**7,020 employees distributed as follows:** 498 with a fixed-term contract, 6,197 with an indefinite-term contract, 325 with a Sena apprenticeship contract.
Revenue from sales to third parties	$5.3*	$8.7*	$8.9
Income from intra-group transactions against other tax jurisdictions	$1.6	$2.1	$ 2.8
Pre-tax profit or loss	$ 616	$374	$533
Tangible assets other than cash and cash equivalents	$590	$522	$558
Corporate income tax paid	$284	$480	$517
Corporate income tax accrued on profits or losses	$-524	$-855	$-554
Reasons for the difference between the cumulative corporate income tax on profits or losses and the taxes calculated if the statutory tax rate is applied to pre-tax profits or losses	The difference originates in income not taxed from tax regulations such as: equity method, dividends, exempt income and application of differential rates, as well as expenses not allowed from tax regulations such as: non-deductible taxes, provisions, among others.	The difference originates in income not taxed from tax regulations, such as: equity method, dividends, exempt income and application of differential rates, as well as expenses not allowed from tax regulations such as: non-deductible taxes and provisions, among others.	The difference originates in income not taxed from tax regulations such as: equity method, dividends, exempt income, application of differential rates; as well as expenses not allowed from tax regulations such as: non-deductible taxes, provisions, among others.

Source: Banco de Occidente
*For the year 2022 and 2023, total operating income was taken into account

Below, we detail the bank's tax obligations, which you can find in greater detail in:

Financial Reporting	2022	Calculated average rate (percentage change 2022 vs. 2023)	2023	Calculated average rate (percentage change 2023 vs. 2024)	2024
Earnings before taxes	$ 1.000	-11%	$ 888	19%	$1.058
Declared taxes	$ 498	-8%	$ 458	23%	$564
A. Income Tax and Complementary Taxes	$ 113		-$ 57		$38
B. Indirect taxes	$ 159		$ 236		$229
VAT	$ 99		$ 103		$119
Industry and Commerce	$ 56		$ 129		$106
Property tax	$ 2		$ 2		$1.8
Surcharges and Others	$ 1.3		$1.3		$1.4
Registration and annotation*	$ 156		$110		$81
C. Finance Superintendence Contribution	$ 10		$ 12		$16
D. Deposit Insurance	$ 114		$ 130		$141
E. Tax on Financial Transactions (4*1000)	$ 39		$ 68		$69
F. Parafiscal and social security contributions	$ 63		$ 69		$71
Dividends decreed in the year of the immediately preceding financial year	$ 150		$ 251		$215
Acceptable cumulative adjustments	$-		$-		$-
Taxes / Dividends Decreed	332%	-45%	182%	44%	$262
Effective tax rate in %	50%	4%	52%	3%	53%
Taxes paid in cash**	$ 669	49%	$ 995	5%	$1.043
Cash Tax Rate (%)**	67%	67%	112%	-12%	99%



Source: Banco de Occidente
* The taxes paid are made through the financial system, this item includes all tax payments payable by the company.
** Registration and annotation For the year 2022 and 2023 the figures were presented in billions of pesos for all items, which is why the figures less than one thousand were not reflected, for the year 2024 the figures were reported in millions of pesos.

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Strategic management of financial and non-financial risks

As part of our comprehensive risk management, we have designed a strategic structure that allows us to identify, assess and mitigate threats that could jeopardize our operational stability and financial sustainability. In this context, we also focus on preventing the materialization of negative impacts for our stakeholders.

At the macroeconomic level, we are aware that instability in the banking sector can have broader consequences, such as the triggering of systemic economic crises that affect employment, investment and financial stability in the country, for this reason, comprehensive risk management becomes an essential pillar to safeguard the interests of our stakeholders and ensure the continuity of our operations.

In Colombia, the financial sector is subject to rigorous regulations, which means that the measures adopted to manage risks must be aligned with regulatory requirements and regulatory guidelines. In this sense, under the framework of the Comprehensive Risk Management System (SIAR) established by the Finance Superintendence of Colombia, we have defined the guidelines and actions necessary to manage the risks inherent to our operations. These risks include:

- Credit Risk
- Market Risk
- Bank Book Interest Rate Risk
- Liquidity Risk
- Operational Risk
- Conduct Risk

Our SIAR is made up of several fundamental stages to guarantee its effectiveness:

Identification

In this stage, the current and potential risks associated with the activities we carry out or that we plan to implement are identified.

Measurement

In this phase, we evaluate and quantify the exposure to risks, as well as the impact they could have if they materialize, this measurement can be both qualitative and quantitative, depending on the type of risk.

Control

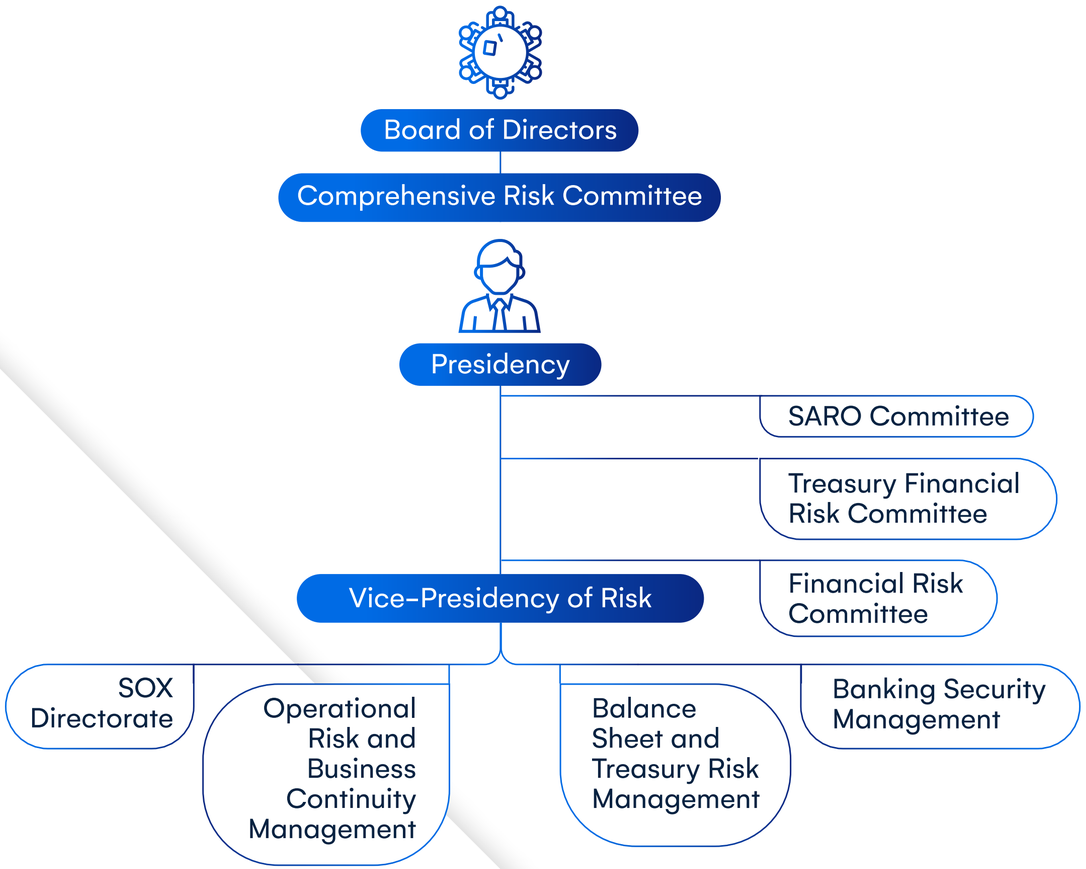
We establish mechanisms to mitigate and reduce the likelihood of risks occurring, as well as to minimize their impact.

Monitoring

We focus on the continuous monitoring of risk sources, the risk profile, deviations from established limits, and the effectiveness of the controls implemented.

As a complement to these actions and in line with our commitment to sustainable investments and with the full awareness that environmental and social risks can impact both our clients and society in general, since 2023 we began the Environmental and Social Risk Management System (SARAS) which was fully implemented in July 2024. This system covers all segments and commercial management of Business Banking, and reinforces our ability to manage risks associated with environmental and social impacts, which could also affect our customers' ability to pay.

Risk Governance



Our comprehensive risk management is led by the Vice Presidency of Risk and Collection led by Fabian Mauricio Arias Jiménez and coordinates a specialized team composed of four managements and a directorate: Balance Sheet and Treasury Risk, Credit Risk, Operational Risk, Banking Security and the SOX Directorate, each unit is focused on a specific area of risk management, guaranteeing comprehensive and specialized coverage.

Responsibilities of the Vice Presidency of Risk and Collection:

- In coordination with the Holding Company Grupo Aval, it must define the risk indicators, limits and thresholds, in accordance with the organizational structure, business lines and guidelines established in our risk appetite statement, based on the methodologies and internal models defined.
- The risk appetite, limits, thresholds and associated results are discussed and approved in several specialized committees, such as the Financial Risk Committee (Corporate Banking, Personal Banking), the Treasury Financial Risk Committee, the ALCO, the SARO Committee and the Risk Committee of Grupo Aval. These items are then submitted to the Board's Comprehensive Risk Committee for consideration and approval.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Risk Management Oversight

Supervision falls on each of the Managers associated with the Vice Presidency of Risk and Collection, who present the results of their monitoring to the different risk committees. In addition, the Board's Comprehensive Risk Committee (CIR), chaired by an independent Board member, meets quarterly to oversee risk management, monitor the risk profile, and ensure that policies and procedures are adequate.

Within its functions, the CIR advises the Board of Directors on operations, events or activities that may affect the exposure and risk profile, approves adjustments to the policies of the Comprehensive Risk Management System (SIAR), and continuously monitors the risk culture in the entity.

Comprehensive Risk Management Compliance

The Compliance Officer has the responsibility of overseeing the risk of money laundering, reporting directly to the Presidency and submitting detailed reports to the Board of Directors each quarter.

Risk Management and Assessment Process

Our Manual: Comprehensive Risk Management System (SIAR) establishes the guidelines, parameters and internal procedures to guarantee adequate and comprehensive risk management in accordance with current regulations. Key elements of this system include:

- Disclosure of the SIAR and the Risk Appetite Framework (MAR) to the Board of Directors, senior management and business units.
- Periodic review of the operation of the SIAR, with the updating of policies and procedures when necessary.
- The definition and monitoring of thresholds and limits of the MAR, as well as the management of risks inherent to new markets and activities.
- The implementation of corrective measures in the event of deviations and the evaluation of their effectiveness.
- Operational risk management and the contracting of insurance and third parties for the development of processes, without delegating the professionalism of risk management.

We have identified high-impact risks, each with their respective controls, among them we highlight:

Information Security and Computer Security (Cybersecurity): Loss of integrity, reliability, availability, and security of customer information, accounts, and cybersecurity.

Main mitigation actions:

- ✓ Computer security monitoring and alert management.
- ✓ Definition of action plans and follow-up to the findings identified in vulnerability and penetration tests in information systems and technological infrastructure.
- ✓ Monitoring of compliance with the information security model of Banco de Occidente and its subsidiaries.
- ✓ Approval, disclosure and verification of compliance with the information security model.
- ✓ Administration and renewal of the Cyber Policy (Cybersecurity).

Business Continuity Plan (PCN): Unavailability of critical Bank services and services provided by third parties due to disruptions in operational and/or technological functions.

Main mitigation actions:

- ✓ Verification of the operation of the alternate computer center.
- ✓ Testing of the business continuity plan for critical processes and testing of defined contingency plans.
- ✓ Monitoring of compliance with the management of critical third party NCP
- ✓ Evidence of PCN's most important events, their solution and follow-up to the SARO Committee.
- ✓ Evidence of the most important Operational Risk and PCN events, their solution and follow-up to the comprehensive risk committee — Board of Directors

KPMG annually carries out an internal audit where it reviews the management of the different types of risks, **in these audits we have obtained generally satisfactory results on all fronts,** when opportunities for improvement are identified, each risk specialty develops action plans to close the gaps detected. These plans are monitored by the aforementioned external auditor and reported both to the risk committee of each specialty and to the comprehensive risk committee of the board of directors. Similarly, **our holding company has a corporate comptroller that periodically evaluates the risk management of the different entities.**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Risk Culture

We foster a strong risk culture to manage and mitigate threats that could impact our stability. In 2024, led by risk management, we carried out several initiatives to expand this culture, which included regulatory courses, inductions, technical training, crisis drills and fraud prevention training.

In addition, we carry out interactive activities and knowledge assessments to ensure that employees are aligned with risk management:

- Annual dissemination of regulatory courses (SARO Course, Information Security, SARLAFT, ABAC).
- Monthly induction for new managers of Business and Personal Banking at credit risk.
- Training for Credit Risk Management employees in SPSS Modeler, Excel, Python and Power BI.
- Training for Balance Sheet Risk and Treasury employees in Python and Power BI.
- Training for third parties in Operational Risk.
- Business Continuity Plan (PCN) crisis drills.
- Training of process owners and new employees for the prevention of risk materialization.
- Permanent training for our employees in fraud prevention.
- Training of members of the Board of Directors of Banco de Occidente on bank book interest rate risk within the development of the regulatory adoption project.
- Periodic disclosure of good practices in the capital market, in these forums emphasis is placed on: Analysis of specific (anonymized) cases derived from the monitoring exercise of verifiable means.
  - ✓ Disclosure of recent regulations or attention to specific concerns by the AMV.
  - ✓ Disclosure of changes or updates in methodologies for the evaluation at market prices of the different Treasury products (Fixed Income, Forward and Spot COP-USD), case statistics, among others.
- Awareness-raising initiatives on various topics related to risk management aimed at all our employees that include the development of videos, infographics, series, among others, which include questionnaires for the assessment of knowledge and interactive activities.

EThat is why each Risk Management, through periodic meetings and a constant feedback process, evaluates best practices and defines actions to strengthen the risk culture in the bank, presenting the results to the respective committees. In addition, those responsible for each process are in charge of implementing corrective measures together with their teams every time an error is detected, thus ensuring effective risk management, as well as:

The Operational Risk Management organizes annual training on the Operational Risk Management System (SARO) and the PCN for third parties that provide services to the entity, while monthly training is carried out for new members of the commercial team. In specific cases, training is also provided to risk managers or areas with particular needs.

On the other hand, the Balance Sheet Risk and Treasury Management – Compliance carries out detailed bimonthly reviews of the findings together with the Treasury Management, analyzing the recurrence of incidents and establishing action plans to prevent future problems.

Incorporation of Risk Criteria in New Products

In accordance with the regulations of the Finance Superintendence of Colombia, the identification of risks is carried out prior to the launch of new products, services, or technologies, as well as the incursion into new markets. The risk of money laundering, terrorist financing and arms proliferation is integrated into all our new projects through risk analysis and the establishment of specific controls. The Balance Sheet and Treasury Risk Management actively participates in the development of new products, validating valuation methodologies and evaluating the impact on risk metrics.

This comprehensive approach allows risks to be managed effectively and ensures that each new project or product conforms to the principles of prudence, control and regulatory compliance.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Emerging Risks

SDG 9.3; 13.2

At Banco de Occidente we analyze emerging risks through the PESTAL methodology which analyzes Political, Economic, Social, Technological, Environmental and Legal factors, through which we were able to identify how climate change and artificial intelligence and new technologies focused on criminal activities, both in Colombia and globally, can have a significant impact on the local economy and that of our clients in the next 3 to 5 years.



Emerging risk	Category	Potential impact	Mitigation actions
Climate change	Environmental	TTaking into account that our bank customers belong to different sectors, in the event of an effect generated by this risk, we may be affected in the non-payment of obligations due to the damages suffered, deterioration and/or interruption of operations. Increased losses in portfolio exposed to sectors vulnerable to extreme weather events. In addition, we may present an increase in market risk due to the Bank's lack of alignment with the sustainable preferences of our clients. Therefore, as an entity we seek to integrate climate risks with our bank's risk management model, with early warnings and mitigation measures through which we can provide our customers with better support and the satisfaction of their needs by reducing environmental risks.	At the Bank, we have carried out a diagnosis of the impact of the risk and we have a preliminary action plan which is being carried out with the consulting firm Deloitte to update the diagnosis, define the governance structure and develop the action plan to mitigate the estimated potential impact. During the last 30 years we have valued more than 3,400 initiatives, encouraging the conservation and care of water, the principle of life. Likewise, we continue with the development of initiatives to mitigate and adapt to climate change.
Artificial intelligence and new technologies focused on criminal activities	Technological	Currently, due to the great scope that this risk has in our sector, we can be strongly impacted by the theft of information through applications, loss of money due to identity theft, theft of confidential information through emerging technologies installed in frequently used devices, kidnapping of information and extortion for its recovery. This risk is thus reflected in the materialization of fraud, the loss of customer information and confidential information of the bank, thus leading us to the materialization of reputational risk due to the impact on the service.	We are working on the implementation of communication strategies for customers and employees focused on preventive actions and confirmation of authenticity in the face of possible requirements through artificial intelligence, in addition we are strengthening the authentication schemes for customers and employees in channels and services provided by the Bank. To mitigate everything related to the risk of new technologies focused on criminal activities, as a bank we are using technologies to protect against malware attacks on the devices of customers and employees, we are also raising awareness about the risks and threats to which customers and employees may be exposed in the event of bad practices in the use of technologies and implementation of cybersecurity tools that prevent attacks from accessing the Bank's infrastructure in cases of deception of people.

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Credit Risk

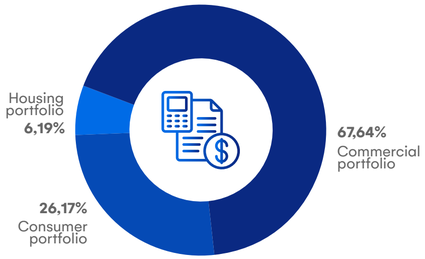
Our Credit Risk Management is carried out through the Credit Risk Management System (SARC), which in turn is part of the Comprehensive Risk Management System (SIAR), and includes the policies, procedures and methodologies established for the proper management of this risk in the bank's portfolio.

By December 2024, the total Bank portfolio totals $48.99 trillion with an annual growth of 7.89% and is distributed 67.64% in the commercial portfolio, 26.17% in the consumer portfolio and 6.19% in the housing portfolio. The portfolio growth by type of credit compared to December 2023 was: commercial 7.81%, consumer 5.81% and housing 18.75%.

At the product level, the commercial portfolio is thus composed of 70.64% by ordinary portfolio, 18.16% by leasing, 8.43% by treasury, 1.73% by Unidirecto, 0.76% by Factoring and 0.29% by Credit Card. On the other hand, in the consumer portfolio, the product with the highest participation is payroll loans with 43.20%, followed by personal loans with 28.28%, vehicle with 20.50%, credit card with 13.20% and revolving credit with 0.32%.

In general, the Bank serves customers in the commercial portfolio of all economic activities, which are grouped into 18 economic sectors where the most representative are: Manufacturing industry with a share of 16.48% ($5,460,847 MM) of the total portfolio,

Total portfolio

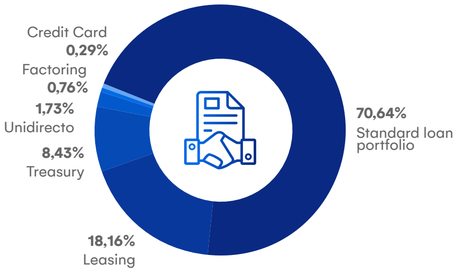


followed by financial and insurance activities with 12.65% ($4,193,494 MM), wholesale trade with 9.86% ($3,268,675 MM), retail trade with 8.09% ($2,682,212 MM) and supply of electricity, gas, steam and air conditioning; water distribution; wastewater evacuation and treatment, waste management and environmental sanitation activities with 7.74% ($2,564,530 MM). The other 13 economic activities represent the remaining 45.18%.

For 2024, our commercial portfolio showed significant growth driven in part by increased exposures in large clients such as Enel, Ecopetrol, Almacenes Éxito, Alcaldía de Medellín, among others.

Regarding the financial system, we occupy the fourth position in the commercial portfolio with a market share of 9.3%, on the other hand, the commercial non-performing loan portfolio presents a slight upward trend compared to 2023, the average Non-Performing Loan Indicator (ICV) was 3.23% in 2024, compared to 2.94% recorded in 2023. Regarding the main banks in the financial system, we have the

Commercial portfolio

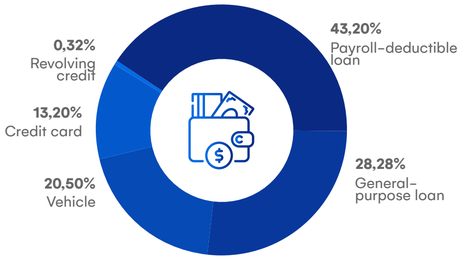


second best commercial ICV, standing at 3.10% as of December 2024, which is 49 basis points lower than the ICV of the banking system (3.59%). Regarding the commercial portfolio scenario for 2025, we expect the bank to continue growing placements in the Corporate, Government, International and Business segments.

In consumer portfolio, with respect to the financial system, we occupy the sixth position in the market's portfolio balance with a share of 6.75% of the total portfolio balance of the system. In addition, our non-performing loan portfolio decreased by 35.19%, in which all products presented similar decreases, with revolving and vehicles presenting a greater decrease of 48.77% and 45.16%, respectively. The Consumer ICV in 2024 had a decreasing trend throughout the year, which closed at 3.99%, presenting a decrease of 38.53% compared to the end of 2023 (6.51%).

The non-performing housing portfolio increased by 3.46% compared to 2023. However, the non-performing loan indicator presented a decrease of

Consumer portfolio



12.87% closing at 4.91%. In addition, by 2024, some factors such as inflation and unemployment fell and GDP grew, indicating a gradual improvement in the ability to pay.

In relation to foreign subsidiaries, as of December 2024, Banco de Occidente Panama's portfolio totals US$545,728,524, 99.92% concentrated in commercial portfolio, its non-performing loan indicator closed at 0.53%, while the portfolio at risk indicator is at 1.13% and the coverage of provisions on the total portfolio stood at 0.96%, which shows stability of the portfolio indicators at the end of 2024. For its part, Occidental Bank Barbados closed December 2024 with a portfolio of US$169,448,817 concentrated 100% in commercial portfolio, the non-performing loan ratio is at levels of 1.72%, the risk portfolio ratio is at 2.31% and the coverage of provisions at 1.16%. In general, a good performance of portfolio indicators is observed.

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Evaluation and Measurement

In the granting of credit we have different models for risk assessment with internal scoring models for the evaluation of the consumer portfolio. In the initial evaluation of operations, models are applied that assign a score to the customer based on bureau variables, as well as behavioral variables with the sector that allow establishing whether the applicant is subject to credit in accordance with the Bank's policies on the minimum score required. There are monitoring models that mainly use variables of customer payment behavior and use of products that allow customers to be qualified and establish the probability of default occurring during the next twelve months.

For the commercial portfolio we have rating models, whose variables are primarily financial indicators that are obtained from the financial statements delivered by customers, with these variables the input models are obtained and for the monitoring models, they are considered variables of payment behavior. As described above, there are entry and monitoring models for the segments of Industry, Commerce, Services, Construction Companies, Territorial Entities and Financial Entities. Among other uses, these models are used in the credit granting process for the classification of customers, in the determination of the amount to be loaned, in the structuring of commercial placement programs, and in monitoring, for the qualification of the portfolio and the estimation of provisions, as well as in the monitoring of the composition of the portfolio by risk.

Exposure limits by economic sector in the commercial portfolio are monitored quarterly, where by December 2024, 100% of the sectors are within the established appetite. In the consumer and housing portfolios, monthly monitoring is carried out such as the Through The Door – Policy Monitoring Score by product and the analysis of disbursements by variables, which reflect the evolution of the harvests, from which adjustments have been made in policies to improve the performance of the portfolio.

Management, Monitoring and Mitigation

The credit risk models applied in the commercial and consumer portfolio are monitored biannually (June and December) in terms of the ability to discriminate customers with good behavior and bad payment behavior through Backtesting. The Accuracy–Ratio (AR) indicator is considered as a measure of goodness of fit. In case the AR is at least 50%, the model remains in production, while if the AR is less than 50%, a new credit risk model must be estimated.

As part of the monitoring, in 2024 we carried out an analysis of the impact of exchange rate risk on our customers, showing that good behavior continues to be observed in customers with an import vocation, since capital presents a growing trend and despite the increase in the overdue, the ICV is at very low levels.

Our portfolio in foreign currency increases its balance a little and keeps the levels of non–performing loans and risk low, due to this during 2024 we monitored international behavior, with analysis of economic growth and inflation, to understand the possible effects and repercussions in the country.

Similarly, we carried out national analyses, specifically in sectors affected by situations such as the La Niña phenomenon, government reforms, input prices, among others; identifying the exposure in these sectors, the number of customers and how the dynamics of the portfolio could be affected. The results of these analyses have led us to conclude that exposure to customers and sectors with possible impacts is low and controlled.

Likewise, during the year we monitored the granting policies by score, profile and risk nodes for each of the products, where they have shown satisfactory results with respect to the 2023 harvests, presenting a decrease in overdue and non–performing loan index (ICV).

We also made the cross–selling of credit cards and payroll loans more flexible, as well as credit cards and personal loans. Likewise, the youth credit card had an adjustment, in which a decrease was made in the cut–off points, among others. At the end of 2023, the implementation of all products in the decision engine was completed, with vehicles being the last to be incorporated. This has allowed for a more timely and efficient administration of granting policies, as well as the administration of placement campaigns and adequate monitoring of portfolio performance. In addition, the implementation of the Decision Engine leveraged a greater dynamic of Campaigns in the Personal Banking portfolio.

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Country Risk Management

The country risk management system allows us to determine the need to have impairment provisions on capital investments abroad. The foregoing corresponds to Banco de Occidente's investments in Banco de Occidente (Panama) S.A. and Occidental Bank Barbados Ltd.

In accordance with the provisions of the SIAR, in 2024 we carried out updates to the country risk assessment. This study assigns a rating to countries in which capital investments are made abroad, which is composed of a base analysis that includes financial, economic and market indicators, and a complementary analysis that focuses on political, institutional, social and projection aspects, complemented by the ratings of the risk rating agencies.

Given that our investment in foreign subsidiaries is in Banco de Occidente Panama – BOP and Occidental Bank Barbados – OBB, entities through which we have portfolios and investments outside Panama and Barbados, the country risk classification (A, B, C, D, E) of these two jurisdictions, in accordance with our policy, can be improved by taking into account the weighted average of the ratings of the countries where the exposure is located. According to the results of the latest update, the countries where we currently have investments obtained the following rating: Panama and Barbados B.

Therefore, and following the policy established by the Bank, it is concluded that, according to the rating obtained in both countries, no provisions are required for impairment of these investments.

Category	Definition	Impairment
A	Satisfactory	0%
B	Stable	
C	Higher risk	20%
D	Macroeconomic instability	50%
E	Irrecoverable conditions	100%

Countries that show an economic, socio-political and legal condition.

Operational Risk

In accordance with the provisions of Chapter XXXI of the Basic Accounting and Financial Circular in its part II and part III regarding Operational Risk Management, we manage operational and Business Continuity risks through identification, measurement, control and monitoring. In this regard, we are constantly working on updating the risks and controls in the processes, monitoring the risk profile and following up on the record of operational risk events, which allows the implementation of corrective actions aimed at mitigating the materialization of events, reducing the levels of exposure to operational risks and the result of exposure to operational risk which is part of the solvency relationship.

Therefore, as of December 31, 2024 and as a result of this update, we had the following results in terms of risks, failures and controls:

Type	December 31, 2024
Processes	167
Risks	671
Failures	1.127
Controls	2.186

With respect to the operational risk profile, as of December 31, 2024, the residual rating is considered low due to the fact that 75% of the risks out of a total of 671 are in the low quadrant. To generate the risk profile, we took into account the risk rating, controls, movements of positions (Risk Managers), updating of applications and procedures, as well as the modifications to the processes documented by the Process Management.

With respect to the net losses recorded due to operational risk events for the year 2024, they were $17.595B broken down as follows: Gross loss due to operational risk events $22.6B and Recoveries of $5.005B.

According to the Basel risk classification, the events originated in: External fraud 53%, $9.378B

Among the most relevant events we had: fraud with credit and debit cards for $7,292 and $273 respectively, under the modalities of non-face-to-face purchases, impersonation, forgery, substitution, lost card and stolen card; and 19 fraud events under the modality of impersonation of person that affected several products for $1,004. Process execution and management 31%, $5.361B

The most relevant events corresponded to: $2,032 for payment of 4 penalties to the DIAN arising from corrections to the income tax returns for the years 2017, 2018, 2019 and 2023, $1,350 for erroneous execution in the process of reimbursements for recoveries of portfolio with guarantee, $390 for withdrawal of the contract for the replacement of air conditioners of the computer center.

- Technological failures 7%, $1.280B: the most relevant event for $742 occurs due to technical incident that generates duplication of payments to third parties.
- Labor Relations 6%, $1.077B.
- Other risk classifications 3%, $499MM.

ERegarding the reports to senior management, on a monthly and quarterly basis, the SARO Committee and the Comprehensive Risk Committee of the Board of Directors, respectively, are informed about the most important aspects of what has occurred in terms of operational risk, a report that includes the follow-up on the implementation of corrective actions aimed at mitigating the risks classified as extreme and high areas, the evolution of losses due to operational risk, action plans based on the materialized events, among others. In the same way, changes in the risk profile are reported, based on the identification of new risks and controls in current and new processes.

In addition, an annual training plan was developed whose purpose was to strengthen the culture and ensure understanding in adequate risk management, thus strengthening the internal control system.

Finally, we constantly monitor the transmission of regulatory reports made by each area of the bank, to comply with the established regulations.

Achievements:

- ✓ We reached 97% compliance with the matrix schedule, it is expected that by 2025 we will ensure 100% in the development of the scheduled monitoring.
- ✓ As for the non-technological tests of the Business Continuity Plan (PCN), 100% of the development of the same was fulfilled, achieving satisfactory results
- ✓ It was possible to monitor 100% of the regulatory reports, meeting the established objective to ensure effective and complete monitoring of all regulatory reports

we constantly monitor the transmission of regulatory reports made by each area of the bank, to comply with the established regulations.



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Conduct Risk

In accordance with the External Guide for the Supervision of Conduct Risk, issued by the Finance Superintendence of Colombia on September 24, 2024, our bank implemented the Conduct Risk Management System, recognizing the importance of properly managing these risks to protect the rights of financial consumers and maintain confidence in the financial system.

Conduct risk is defined as the possibility of affecting the rights of the financial consumer or the market, derived from a practice of a supervised entity. In this regard, our bank has implemented a conduct risk management system, which includes policies, procedures and methodologies designed to promote fair, transparent and ethical practices in all our operations, ensuring that our products and services are aligned with the needs and expectations of our customers.

Since 2024, we have carried out the process of implementing this system, continuously reporting to the Board of Directors on its progress and evolution.

To identify conduct risks, we carry out an analysis based on the operational risk matrix and identify the processes involved in the life cycle of our financial products and services. From this analysis, we have identified the conduct risks to which our financial consumers are exposed and their potential impact.



To this end, we consider the pillars of the Consumer Service System (SAC) defined in Law 1328 of 2009, the database of complaints filed by consumers in the last year, and the classification of risk factors and their causes established in the External Guide for Supervision of Conduct Risk of the Finance Superintendence of Colombia.

As of December 2024, 139 risks and 526 controls were identified. However, during 2025, a purging process has been carried out to optimize the management of these risks, prioritizing those with the greatest impact on the customer.

Finally, our bank promotes a customer-centric organizational culture, supported by continuous training programs for our employees, with the aim of preventing possible effects and strengthening trust with our users. These actions are aligned with the commitment to mitigate the conduct risk.

Business Continuity Plan

During 2024, we continued with the work of permanently updating the Continuity model (updating strategies, process tests, business impact analysis (BIA), and call tree), as well as monitoring compliance with service level agreements for their respective update.

Likewise, aiming to strengthening the business continuity management system, we began the first phase of implementation of the contingency scheme under the Full VPN mechanism, where the employees' house functions as a contingency operation center for the Bank's critical processes, this in order to have an additional alternative to our current scheme and thus have more tools in the face of crisis events that can arise.

At the technological level, throughout 2024 we executed activities on the infrastructure that supports the Bank's critical applications and we were able to operate some applications in the Alternate Computer Center, guaranteeing that, in the event of a service failure in the main computer center, the banking operation would be continued.

Finally, and in order to comply with External Circular 042 of 2012 of the Finance Superintendence, we monitored the continuity plans of third parties that provide us with critical services, a scheme that has been strengthened with the support of Asobancaria.

Liquidity Risk

The Parent Company manages liquidity risk in accordance with the standard model established in Chapter XXXI (annexes 9 and 12) of the Basic Accounting and Financial Circular of the Finance Superintendence of Colombia and in accordance with the basic principles of the Comprehensive Risk Management System (SIAR), which establishes the

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minimum prudential parameters that entities must implement in their operation to efficiently manage the liquidity risk they are exposed to.

To measure liquidity risk, the Parent Company calculates a Liquidity Risk Indicator (IRL) on a weekly basis for terms of 7, 15, 30 and 90 days, as established in the standard model of the Finance Superintendence of Colombia and on a quarterly basis for its subsidiaries to measure the liquidity risk of the conglomerate.

In addition, the Parent Company measures monthly the stability of its funding in relation to the composition of its assets and positions outside the statement of financial position, over a one-year horizon through the net stable coefficient (CFEN), as established in the standard model of the Finance Superintendence of Colombia.

On a daily basis, we monitor the availability of resources not only to meet reserve requirements, but also to foresee and/or anticipate possible changes in the Parent's liquidity risk profile and to be able to make strategic decisions as appropriate. In this sense, the Parent has liquidity early warning indicators that allow establishing and determining the scenario in which it finds itself, as well as the strategies to be followed in each case. Such indicators include the level of high-quality liquid assets, the levels of concentration of deposits, the use of liquidity limits of the Bank of the Republic, among others.

Through the technical committees on assets and liabilities (Finance and ALCO Committee) and the Comprehensive Risk Committee of the Board of Directors, the Bank's senior management is aware of the liquidity situation and makes the necessary decisions taking into account the high-quality liquid assets that must be held, the tolerance in the management of liquidity or minimum liquidity, strategies for granting loans and raising funds, policies on the placement of surplus liquidity, changes in the characteristics of existing products as well as new products, diversification of sources of funds to avoid the concentration of deposits in a few investors or savers, hedging strategies, the results of the Parent Company and changes in the balance sheet structure.

In terms of Liquidity Risk management, during 2024, we had a sufficient level of liquid assets to meet short-term liquidity requirements. In accordance with the above, under SFC methodology, liquid assets and 30-day liquidity requirements stood at an average of $8.6 trillion and $6.2 trillion respectively, yielding a ratio of 139.3% that is comfortable with respect to the appetite limit (minimum 120.0%) defined by the Bank and well above the legal limit (minimum 100.0%). In ALM management, we highlight the permanent monitoring of early warning indicators, which generally had a stable behavior within the established appetite limits.

The summary table of projected available liquid assets as of December 31, 2024 and 2023 is detailed below:

December 31, 2024				
	Subsequent net available balances			
Entity	Net assets available at the end of the period (1)	From 1 to 7 days (2)	From 1 to 30 subsequent days (2)	From 31 to 90 subsequent days (2)
Parent Company	$ 7,686,166	5,028,387	1,814,098	(10,488,445)
Occidental Bank Barbados Ltd.	446,022	388,471	231,305	(428,112)
Banco de Occidente Panama S.A	1,152,428	1,044,779	900,821	(282,705)
Fiduciaria de Occidente S.A.	-	-	-	-
TOTAL	**$ 9,284,616**	**6,461,637**	**2,946,224**	**(11,199,262)**

December 31, 2023				
	Subsequent net available balances			
Entity	Net assets available at the end of the period (1)	From 1 to 7 days (2)	From 1 to 30 subsequent days (2)	From 31 to 90 subsequent days (2)
Parent Company	$ 7,367,675	5,610,245	1,816,402	(8,313,196)
Occidental Bank Barbados Ltd.	339,540	320,774	180,074	(97,083)
Banco de Occidente Panama S.A	931,350	796,326	534,710	(63,229)
Fiduciaria de Occidente S.A.	-	-	-	-
TOTAL	**$ 8,638,565**	**6,727,345**	**2,531,186**	**(8,473,508)**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Regarding structural liquidity, measured through the net stable funding ratio (CFEN), we reflect an average annual available funding stability of 105.86% in relation to its required funding. At the end of December, the CFEN reached levels of 105.62%, showing relative stability between the composition of assets and liabilities.

The following is the result of the CFEN net stable funding ratio of the Parent Company with cut-off as of December 31, 2024 and 2023, in accordance with the provisions of the Finance Superintendence of Colombia for this purpose:

December 31, 2024			
Entity	**Stable Funding Available (FED)**	**Stable Funding Required (FER)**	**Net Stable Financing Coefficient (CFEN)**
Banco de Occidente	39,337,640	37,245,588	105.62

December 31, 2023			
Entity	**Stable Funding Available (FED)**	**Stable Funding Required (FER)**	**Net Stable Financing Coefficient (CFEN)**
Banco de Occidente	36,944,157	33,973,159	108.75



Market Risk

Our Bank participates in the money, foreign exchange and capital markets seeking to satisfy its needs and those of its customers in accordance with the established policies and risk levels. In this sense, it manages different portfolios of financial assets within the limits and levels of risk allowed.

As of December 31, 2024 and 2023, the Parent and subsidiaries had the following financial assets and liabilities subject to market risk:

	December 31, 2024	December 31, 2023
Assets		
Financial assets at fair value with changes in income		
Investments in debt securities	$ 8,299,454	3,459,592
Negotiation derivative instruments	490,708	1,276,723
Hedging derivative instruments	–	–
Subtotal	**8,790,162**	**4,736,315**
Equity instruments at fair value with changes in OCI		
Investments in debt securities	$ 5,721,126	4,465,686
Subtotal	**5,721,126**	**4,465,686**
Financial assets at amortized cost		
Investments in debt securities	2,133,673	2,034,558
Subtotal	**2,133,673**	**2,034,558**
Total assets	**16,644,961**	**11,236,559**
Liabilities		
Negotiation derivative instruments	(532,715)	(1,055,896)
Hedging derivative instruments	–	(2,494)
Total liabilities	**(532,715)**	**(1,058,390)**
Net position	**$ 16,112,246**	**10,178,169**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

The management of Market Risk is mainly represented by the management of the parent company's fixed income portfolio, which during 2024 stood at an average of $8.89T, with an average duration of 45 months and a concentration of 46% in the medium term (greater than 2 and less than 5 years). The portfolio level is higher than that observed during the previous year, due to the business strategy of having a greater exposure of the portfolio to inflation given the real rates presented by the market (UVR securities), tactical purchases looking for favorable market movements, as well as the dynamics of the market maker scheme, clarifying that the latter portfolio is hedged with derivatives of securities (put) and short operations, closing the risk.

This resulted in a higher level of market risk exposure – SFC regulatory VaR – which on average represented $279.793B per year. In particular, for the end of December 2024, the Value at Risk stood at levels of $339.369B for the aforementioned reasons. The results of the Value at Risk are within the appetite limits established in relation to technical equity (average year of 5.1% vs. maximum 7.0%). According to the standard model, the consolidated market value at risk (VaR) as of December 31, 2024 and 2023 was as follows:

Entity	December 31, 2024	December 31, 2023
Parent Company	$ 339,369	184,778
Occidental Bank Barbados Ltd.	10,569	7,537
Banco de Occidente Panama S.A	25,757	20,495
Fiduciaria de Occidente S.A.	6,277	5,545
Total	**381,972**	**218,355**

The VaR indicators presented by the Parent Company and subsidiaries during the years ended December 31, 2024 and 2023 are summarized below:

December 31, 2024				
	Minimum	Average	Maximum	Last
Interest rate	$ 264,941	322,068	379,009	379,009
Exchange rate	1,078	3,402	9,151	1,971
Shares	–	–	–	–
Collective portfolios	934	991	1,031	992
Credit Default Swaps (CDS)	–	–	–	–
VaR of Portfolio				**381,972**

31 de diciembre de 2023				
	Minimum	Average	Maximum	Last
Interest rate	$ 179,858	205,998	251,416	217,031
Exchange rate	717	3,662	11,894	717
Shares	–	–	–	–
Collective portfolios	569	15,259	85,455	607
Credit Default Swaps (CDS)	–	–	–	–
VaR of Portfolio				**218,355**



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



As a management tool for the administration of investment portfolios, different sensitivity analyses are carried out on these portfolios to different basic points.

Below are the sensitivity results as of December 31, 2024 and 2023:

December 31, 2024					
	Portfolio Value	25 PB	50 PB	75 PB	100 PB
Parent Company Fair Value	$ 12,182,236	(101,064)	(200,492)	(298,290)	(394,560)
Occidental Bank (Barbados) Ltd. Fair Value	470,988	(3,629)	(7,205)	(10,727)	(14,198)
Banco de Occidente Panama S.A. Fair Value	1,287,902	(8,590)	(17,059)	(25,409)	(33,642)
Fiduciaria de Occidente S.A. Fair Value	79,455	(732)	(1,463)	(2,195)	(2,927)
Total	**$ 14,020,581**	**(114,015)**	**(226,219)**	**(336,621)**	**(445,327)**

December 31, 2023					
	Portfolio Value	25 PB	50 PB	75 PB	100 PB
Parent Company Fair Value	$ 6,514,161	(48,951)	(97,055)	(144,314)	(190,804)
Occidental Bank (Barbados) Ltd. Fair Value	344,778	(2,675)	(5,303)	(7,886)	(10,425)
Banco de Occidente Panama S.A. Fair Value	984,474	(7,054)	(13,998)	(20,835)	(27,566)
Fiduciaria de Occidente S.A. Fair Value	81,817	(768)	(1,535)	(2,303)	(3,070)
Total	**$ 7,925,230**	**(59,448)**	**(117,891)**	**(175,338)**	**(231,865)**

Qualitative Analysis

We participated in the monetary, foreign exchange and capital markets in the search to satisfy its needs and those of its customers in accordance with the established policies and risk levels. In this regard, we manage different portfolios of financial assets within the permitted limits and risk levels.

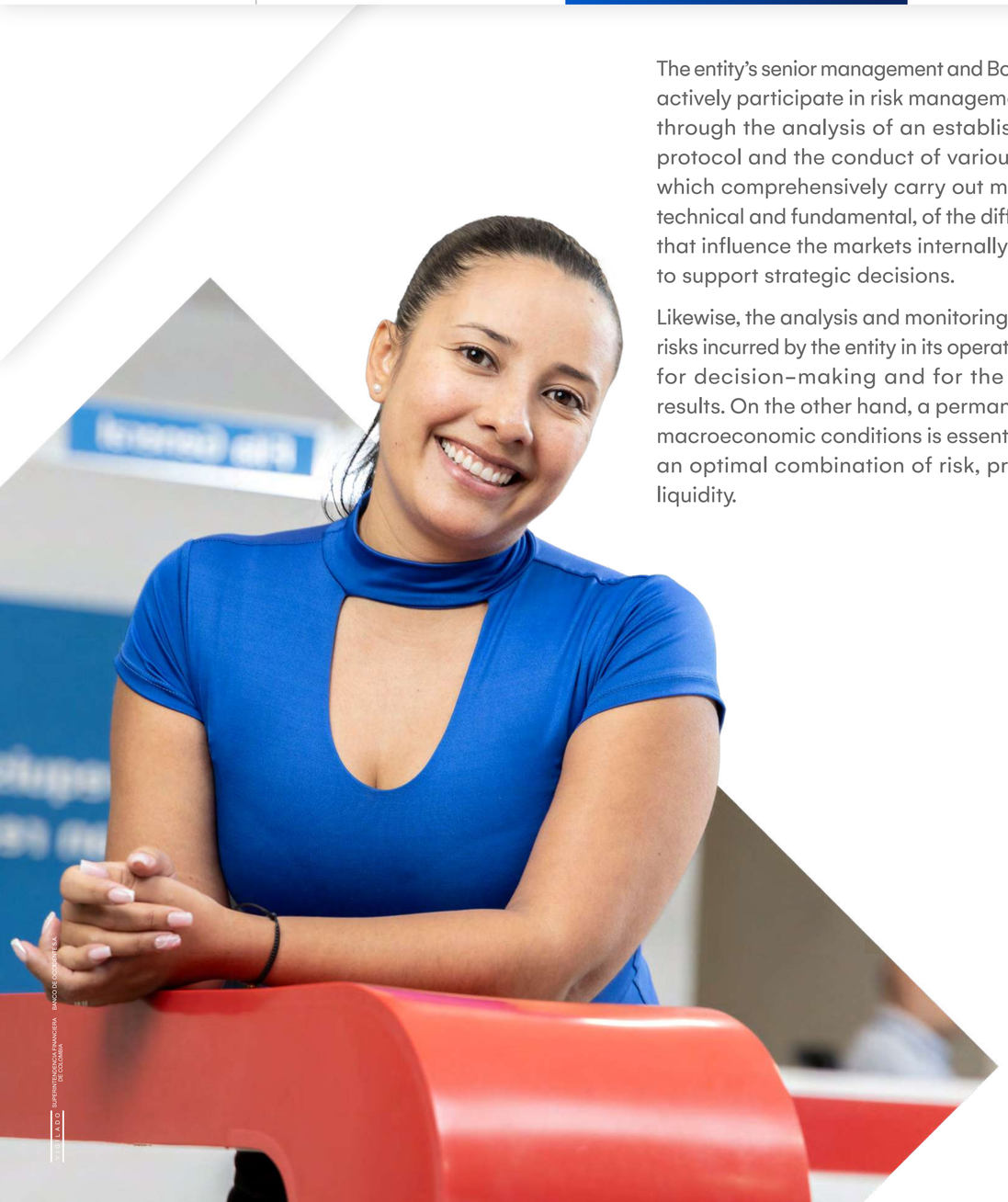
Market risk arises from the entity's open positions in investment portfolios in debt securities and derivative instruments, from adverse changes in risk factors such as interest rates, inflation, foreign currency exchange rates and their volatility, as well as in the liquidity of the markets in which it operates.

At Banco de Occidente we negotiate financial instruments with several objectives, among which the following stand out:

- ✓ Offer products tailored to the needs of customers, which fulfill, among others, the function of covering their financial risks.
- ✓ Structure portfolios to take advantage of arbitrages between different curves, assets and markets and obtain returns with adequate capital consumption.
- ✓ Carry out operations with derivatives, for intermediation purposes with clients or to capitalize on arbitrage opportunities, both exchange rate and interest rates in the local and foreign markets.

In carrying out these operations, we incur risks within defined limits or mitigate them with the use of operations of other derivative financial instruments.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



The entity's senior management and Board of Directors actively participate in risk management and control through the analysis of an established reporting protocol and the conduct of various Committees, which comprehensively carry out monitoring, both technical and fundamental, of the different variables that influence the markets internally and externally to support strategic decisions.

Likewise, the analysis and monitoring of the different risks incurred by the entity in its operations is essential for decision-making and for the evaluation of results. On the other hand, a permanent analysis of macroeconomic conditions is essential in achieving an optimal combination of risk, profitability and liquidity.

The risks assumed in carrying out operations are reflected in a structure of limits for positions in different instruments according to their specific strategy, the depth of the markets in which they operate, their impact on the weight of assets by risk and level of solvency, as well as the balance sheet structure.

These limits are permanently monitored and reported daily to senior management, biweekly to the Finance Committee, monthly to the Risk Committee and quarterly to the Board of Directors (Integral Risk Committee).

Market risks are quantified through value-at-risk models (internal and standard). The Boards of Directors approve a structure of limits based on the value at risk associated with the annual profit budget and establish additional limits by type of risk.

We use the standard model for measuring, controlling and managing the market risk of interest rates and exchange rates in the treasury and bank books. These measurements are carried out on a daily basis in the case of the Parent Company and monthly for each of its subsidiaries to measure and monitor the conglomerate risk.

We currently map the active and passive positions of the treasury book, within zones and bands according to the duration of the portfolios, the investments in collective portfolios and the net position (assets minus liabilities) in foreign currency, both in the bank book and the treasury book, in line with the standard model recommended by the Basel Committee.

Likewise, the Parent Company has parametric internal management models based on the Value at Risk (VaR) methodology, which have allowed it to complement market risk management by identifying and analyzing variations in risk factors (interest rates, exchange rates and price indices) on the value of the different instruments that make up the portfolios. These models are JP Morgan's Risk Metrics.

The methodologies used to measure VaR are periodically evaluated and subjected to performance tests to determine their effectiveness. In addition, at the Bank we have tools to carry out stress tests and/or sensitization of portfolios under the simulation of extreme scenarios.

We use the standard model for measuring, controlling and managing the market risk of interest rates and exchange rates in the treasury and bank books.

Bank Book Interest Rate Risk



Bank book interest rate risk is defined as *"present or prospective risk to the entity's capital and earnings arising from adverse movements in interest rates and affecting bank book positions."* Likewise, Bank Book Credit Spread Risk (RSCLB) is defined as *"any type of credit spread and liquidity spread risk that is not explained by the RTILB, nor by credit risk"*. At the Bank, we have defined within our policies that this risk is only applicable to bank book positions that do not consume capital due to market risk, including transactions of assets, liabilities and off-balance sheet items that have this exposure.

In this sense, we have exposure to interest rate fluctuations that impact future cash flows. The risk may arise due to the mismatch in the repricing time between assets, liabilities and off-balance sheet positions, the use of different interest rates (IBR, DTF, SOFR, Fixed, etc.) and the options that may generate changes in the cash flows of both the active or passive positions made by the Bank (for example, prepayments). Interest margins can be increased or reduced as a result of changes in interest rates, bringing with them impacts on the institution's results, however, at the Bank we have mechanisms such as hedging through derivative instruments to deal with the risks associated with the interest rate in the bank book.

At the Bank, we manage the Bank Book Interest Rate Risk (RTILB) in accordance with the standard model established in Chapter XXXI (annex 15) of the Basic Accounting and Financial Circular of the Finance Superintendence of Colombia, which establishes the minimum prudential parameters that entities must supervise in their operation to efficiently manage this risk.

To measure the RTILB, we calculated two indicators, the ΔVEP (economic value of equity) under six shock scenarios (parallel up, parallel down, flattening, steepness, rise in the short, fall in the short) and the ΔMNI (net interest margin), under two interest rate shock scenarios (parallel up and parallel down), as established in the standard model of the Finance Superintendence of Colombia.

The ΔMNI has a short-term approach, since it measures the impact of the shock scenario for the one-year horizon and under the assumption of constant balance sheet, i.e., that there is no growth or decrease in balance sheet positions. This metric reflects the impact on net interest income under a parallel shock of +/- 400 bps. In addition, the sensitivity for a parallel shock of +/- 100bps is calculated.

The ΔVEP has a long-term approach and under the assumption of balance sheet in liquidation, that is, the total time horizon until the last maturity of the positions on the balance sheet is evaluated. This metric includes, under different scenarios, the change in the present value of interest-rate sensitive assets and liabilities and, therefore, their final impact on the economic value of equity.

According to the regulatory framework, the SFC requires that the maximum value of sensitivity to the VEP under the six interest rate shock scenarios be below 15% of the sum of the Ordinary Basic Equity (PBO) and the Additional Basic Equity (PBA). Therefore, the Bank monitors compliance with this indicator, and has a risk appetite statement, which is monitored on a monthly basis.

The results obtained in the measurement of sensitivity to the VEP and the MNI for the cut-off December 31, 2024 are presented below, where it is evident that the Bank is within the defined appetite (maximum 9.00% according to internal thresholds) and has slack with respect to the regulatory limit (15.00%).

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Banking Book Interest Rate Risk Figure in millions of pesos		
		December 31, 2024
1. Delta Net Interest Margin (DMNI)		
1.1 Parallel shift upwards	$	538,969
1.2 Parallel shift downwards	$	-430,221
2. Delta Net Interest Margin (DMNI) | Parallel 100 pbs.		
2.1 Parallel shift upwards + 100 pbs	$	203,811
2.2 Parallel shift downwards - 100 pbs	$	-174,079
2. Delta economic value of equity (DVEP) + KAO		
2.1 Parallel shift upwards	$	322,975
2.2 Parallel shift downwards	$	85,678
2.3 Steepening shock	$	-155,760
2.4 Flattening shock	$	331,065
2.5 Short-term shift upwards	$	269,128
2.6 Short-term shift downwards	$	-49,635
2.7 Maximum D VEP (Base-Adverse) + KAO / PBA+PBO	$	7.17%
3. Delta Equity Economic Value (DVEP) + Parallel KAO 100 pbs.		
3.1 Parallel shift upwards	$	77,158
3.2 Parallel shift downwards	$	55,035
4. PBO + PBA		
4.1 Ordinary Basic Equity	$	4,619,873
4.2 Additional Basic Equity	$	0.00

These results are based on the fact that the Bank's cumulative reprice gap does not present a significant mismatch and therefore the exposure to bank book interest rate risk (RTILB) is not significant when evaluated from the sensitivity to the economic value of equity (VEP). When the duration of the asset and liability are close, a change in interest rates affects both balance sheet items in similar proportions. This allows us to conclude that maintaining a repricing structure with a not so wide mismatch is a way of protecting the value of the entity's equity.

In addition, the results obtained around the RSCLB for the same evaluation period are recorded. Based on historical information and for a scenario of interest rate hikes, the Bank (for a three-month period) has a probability of loss of $98.247B for investments classified as available-for-sale that are not delivered as collateral in central counterparty risk or in the development of money market operations (repos, buyback/sellback or temporary transfer of securities).

Metrics	Currency	Scenario	Value Δ
RSCLB	COP	Rate Increase	-98,247

(Figures in millions of pesos)

The management of the RTILB, which incorporates credit differential risk and RSCLB liquidity spread, is the responsibility of the ALM Management and the Balance Sheet and Treasury Risk Management; however, through the ALCO committee, strategies are defined that involve the Financial Planning area and the commercial areas, allowing the objectives proposed by the Bank to be met and keeping the RTILB within the defined appetite.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

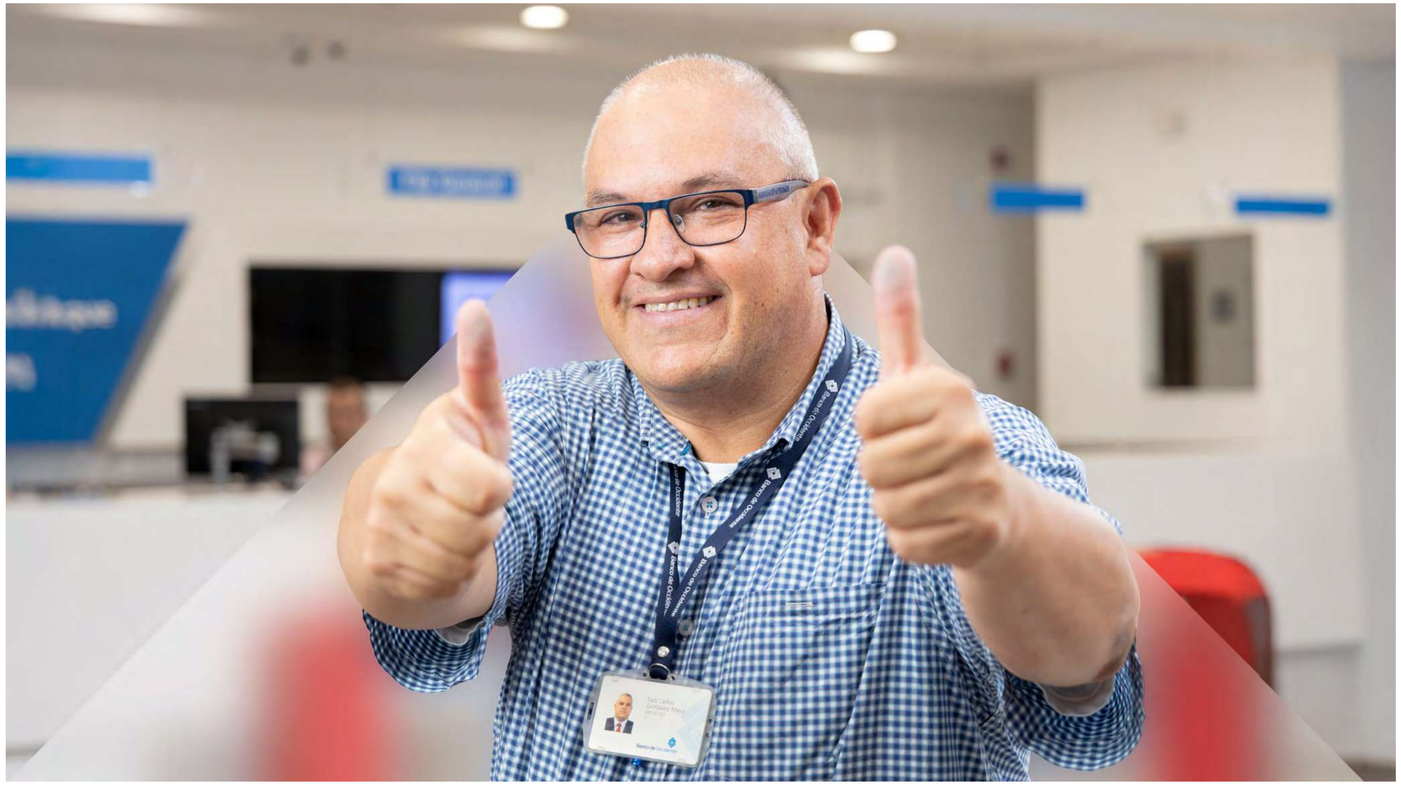
Stress Tests

| SASB FN-CB-550a.2 |

In the case of the 2024 Stress Tests as regulated in Circular Letter 028 of 2024, four scenarios were defined: the Base scenario, which corresponds to a context in which the economy and the financial system do not suffer unexpected shocks; an adverse scenario, which constitutes a hypothetical context in which the economy and the financial system are affected by unexpected shocks which are severe enough to produce breaches in the minimum regulatory requirements of solvency and liquidity; an adverse scenario with climate risk (rainfall), which adds to the events of the adverse scenario, the materialization of acute physical risks derived from climate change; and an adverse scenario with mitigating factors, which preserves the macroeconomic assumptions of the adverse scenario, but including the mitigating actions carried out by the Bank to increase its solvency and liquidity levels above regulatory limits. It should be noted that the adverse scenario is totally hypothetical in its construction to model non-compliance with the regulatory solvency and CFEN (Net Stable Funding Ratio) and is not foreseeable to occur in the medium and long term.

For this EPR (Stress Test Scheme) exercise that we carried out and in accordance with what was defined by SFC (Finance Superintendence of Colombia), it is based on information from balance sheet figures at end of December 2023 and is defined as the basis for the projections for the following three years: 2024, 2025 and 2026. Similarly, 32 variables are considered at the macroeconomic level for each of the referred scenarios.

Regarding the Solvency Ratio, in the base scenario we comply in all the years of the projection with the minimum requirements of Basic Solvency, Additional Basic Solvency Ratio and Total Solvency Ratio, taking into account the implementation plan of the conservation buffer defined in Decree 1477 of 2018. In the case of the adverse scenario, we worked with a hypothetical scenario that would allow us to reach regulatory non-compliance with the Total Solvency Ratio by 2026. At the beginning of 2026, the Total Solvency Ratio was below regulatory levels, a situation that normalized in the mitigating scenario and in which it was once again above the aforementioned limits.



As for the CFEN, in the base scenario, the upward behavior of the Available Stable Funding (FED) is offset by the increase in the Required Stable Funding (RES), which leads to a stability of the indicator and its regulatory compliance over the projection horizon. In the case of the adverse scenario, there is a non-compliance with the indicator at the end of 2025 mainly explained by the bearish behavior of the Stable Available Funding (FED), this situation is reversed in the adverse scenario with mitigating factors, based on the Bank's funding recomposition.

Additionally, and under the guidance received from the supervisor under Circular Letter 028 of 2024, the Adverse Climate Risk scenario is included through the construction of models that allow evaluating the impact of the increase in rainfall on the non-performing loan portfolio and the portfolio at risk, considering the historical behavior from 2019 onwards. This effect was incorporated considering the regional segmentation in which the bank actively participates, and the initial conditions raised in the adverse scenario were taken as a starting point.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

SARLAFT

The Money Laundering and Terrorist Financing Risk Management System (SARLAFT) allows us to comply with national and international regulations on the prevention of financial crimes, protecting its reputation and ensuring that it is not involved in illicit activities. Among the functions exercised we highlight:

- **Customer Due Diligence:** It is important for us to know our customers through the collection and verification of detailed information, such as identity, origin of funds, economic activity, among others. We do this by assessing risks based on the client's profile, the transactions carried out and their geographical location.
- **Transaction Monitoring:** We will constantly monitor transactions to identify unusual or suspicious patterns that may indicate money laundering or terrorist financing activities. This can include large transactions, international transfers, or movements that do not match the customer's profile.
- **Suspicious Transaction Reports:** When we identify a suspicious or attempted transaction, we must report it to the Financial Information and Analysis Unit — UIAF, which is the competent authority in the matter.
- **Ongoing Training:** Our employees are regularly trained to identify signs of suspicious activity and understand the importance of compliance with SARLAFT regulations.
- **Audit and Evaluation:** We conduct internal audits to assess the effectiveness of the SARLAFT system, ensuring that all procedures are in place and regulations are complied with.
- **Risk Management:** We identify and evaluate the risks inherent to our operation, implementing measures to mitigate the risks of money laundering, terrorist financing and financing of the proliferation of weapons of mass destruction, this includes the segmentation of high-risk customers, the control of specific financial products and the implementation of additional security measures.

> **The percentages established by the regulator were exceeded, achieving results higher than those required**

Achievements

- The implementation of specialized transactional monitoring scenarios was carried out, covering both international operations and legal currency. This included the redesign and adjustment of 70% of the monitoring conditions for foreign currency, as well as the definition of new conditions for legal currency. The monitoring conditions are expected to be fully operational during the second quarter of 2025.
- Through technological modernization, the massification of a unified consultation tool that will integrate internal and external sources for the bank's different applications was achieved, this will allow the implementation of process automation with the aim of improving response times. It is expected that the massification of this tool will be fully available by the fourth quarter of 2025.
- The percentages established by the regulator were exceeded, achieving results higher than those required in terms of the coherence of the SARLAFT risk matrix, the detail of the final beneficiary and the updating of customer information.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Global Systemically Important Banks

SASB FN-CB-550a.1.

The Finance Superintendence in Circular Letter 74 of 2024 and in compliance with the provisions of the paragraph of article 2.1.1.4.3 of Decree 2555 of 2010, published the list of systemically important entities (SIE) for the year 2025, in accordance with the methodology parameters for their identification. For the calculation of the indicator, information was used with a cut-off June 30, 2024 and the results were presented at Session No. 91 of the Financial System Coordination and Monitoring Committee.

According to the results, we were positioned in fifth place, with a score of 6.60% against the established threshold of 6.45%, so that for the first time it is considered a systemically important Bank. This classification in no case represents a perception or risk rating of the entities.

Finally, it is important to note that the SFC, through Resolution No. 2629 of December 27, 2024, granted a period of 2 years progressively for the constitution of the additional buffer of the systemic entity, equivalent to 1% of the assets weighted by level of credit, market and operational risk, as follows:



1 First stage:
30% before June 30, 2025.

2 Second stage:
additional **30%** before November 15, 2025.

3 Third stage:
additional **20%** before May 31, 2026.

4 Fourth stage:
additional **20%** before November 15, 2026

Components of BIS leverage	2022	2023	2024
(Basel III) Tier 1 Capital	3.949.457 MM	4.348.265 MM	4.619.873 MM
(Basel III) Total exposure (on- and off-balance sheet exposures)	56.629.015 MM	65.855.871 MM	75.193.855 MM
(Basel III) Leverage ratio	6,97%	6,60%	6.14%

Basel III) Tier 1 capital: Presents a growth of $271.607 B mainly due to the internal capital generation that the entity achieved during the last year, reflected in a level of profits that increased by 15% compared to 2023, and in a rebound in other comprehensive income (OCI). This, together with responsible decisions in terms of profit retention, demonstrates the commitment of the entity and its shareholders to promote the adequate level of capital sufficient to comply with regulatory requirements and maintain an equity structure that allows the Bank to leverage the expected growth in line with its strategic and business plan.

(Basel III) Total exposure (on- and off-balance sheet exposures): Corresponds to the value of all the credit exposures that the Bank has in the development of its different business units. The observed increase is due to the good performance in terms of growth of the portfolio and the investment portfolio, which has allowed the Bank to be an active competitor and increasingly relevant in the Colombian banking system.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Environmental and Social Risk Management System (SARAS)

SDG 13.2
| SASB FN-CB-410a.2 |

At Banco de Occidente, we reaffirm our commitment to sustainability and the responsible management of environmental and social risks through the implementation of the Environmental and Social Risk Management System (SARAS). This system was developed in 2023 with the support of the NINT consultant, enabling us to define specific parameters for classifying and managing these risks among ourBusiness Banking clients.

As part of the process, during the second half of 2023, we conducted a pilot test involving 30 relationship managers, evaluating all their credit operations. Subsequently, on January 31, 2024, we began the phased implementation of SARAS in three phases, culminating in July 2024 with 100% coverage of SARAS evaluations for our Business Banking customers.

The main objective of SARAS is to identify, mitigate and monitor environmental and social risks in the operations evaluated, minimizing the Bank's exposure to regulatory, credit, operational and reputational impacts. The system applies to all Business Banking operations, including Business 1 and 2, Corporate, Government and the Structured Finance Unit (UFE), across all sectors and industries.

Risk Classification and Monitoring

SARAS classifies risks into three stages:

Exclusion
We identify prohibited activities and activities with exceptions due to their environmental and social impact.

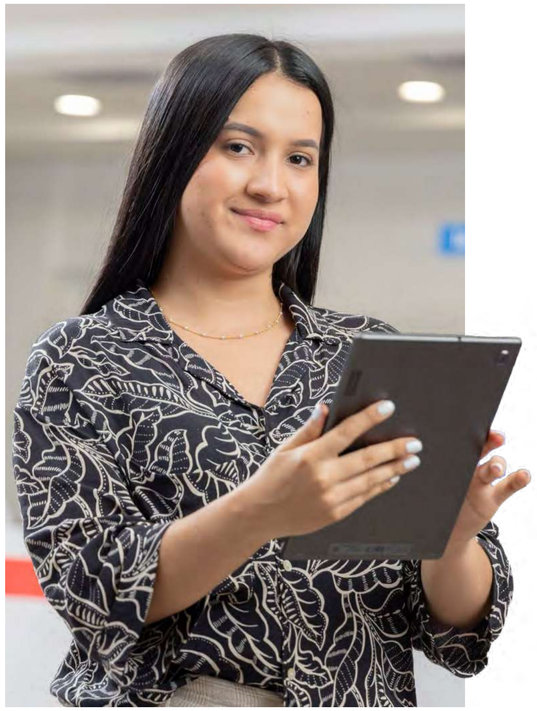
Risk Assessment
We determine the risk category of the operation.

Follow-up and Monitoring
We supervise operations with environmental and social risk management tools daily.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

We have an exclusion list that identifies prohibited activities, and we establish restrictions for certain activities with exceptions, ensuring that they do not exceed 5% of the Bank's portfolio. For high-risk transactions, we require environmental and social due diligence reportsprepared by external experts and reviewed by our senior environmental analyst before submission to credit approval committees.



Integration of ESG Aspects into Credit Analysis

From the Structured Finance Unit (UFE), we integrate ESG criteria into the analysis of large-scale projects, particularly those related to construction sector. We evaluate required permits and licenses and engage in dialogue with clients to determine if environmental and social due diligence is necessary. Before being presented to the credit committee, all projects must have term sheets reviewed by the UFE team, a project engineer. No disbursements are made without the required information and the above conditions met.

Evaluation of Operations with Environmental and Social Risks

By 2024, we evaluated 60% of the operations served by the UFE, including two high-risk cases where an environmental and social due diligence report was required before proceeding with the evaluation. This evaluation is part of the third phase of SARAS implementation.



Examples of Projects Evaluated with ESG Criteria

Compañía de Puertos Asociados SA:

- Participation in syndicated credit for the refinancing of current debt and additional resources for Capex (construction of silos). Risk assessment: Risk B (medium). Mitigation measures: implementation of an internal procedure for monitoring environmental and social requirements and promoting gender equity.

Alumbrado Público de Cartago SAS:

- Modernization of the public lighting of Cartago. Risk assessment: Risk C (low). As it is a low-impact project, the SARAS evaluation was not emhanced.

Oversight and Accountability in ESG Incorporation

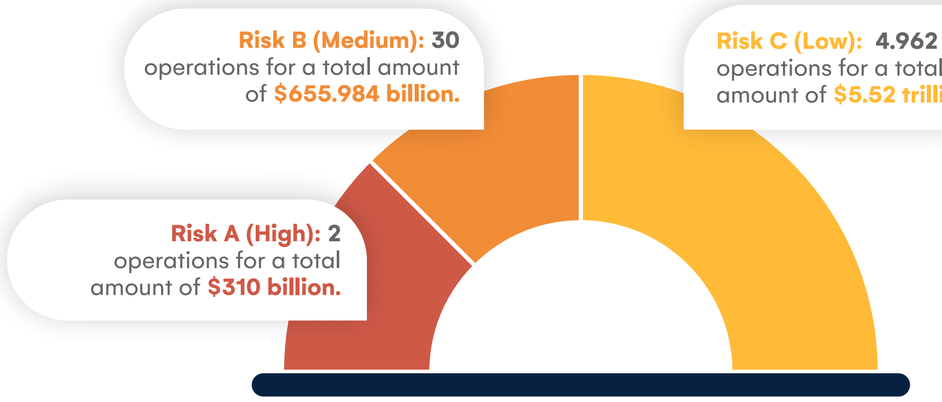
The SARAS process assessment classifies risks as follows:

- Risk A (high): UFE operations in pre-construction or construction, with amounts greater than USD 10 million and require an environmental licence according to Decree 1076 of 2015
- Risk B (medium): Activities that may require an environmental license according to Decree 1076 of 2015 and/or exceed USD 10 million.
- Risk C (low): Represents 98% of the operations currently evaluated.

100% of the operations evaluated comply with the commitments with funders and annual reports of results are presented. In addition, we make quarterly reports to Aval in spaces with all the banks of the group.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

At the end of 2024, we have evaluated a total of **4,994 operations** within the framework of our environmental and social risk management, which we have classified according to their level of risk as follows:



*All operations categorized in Risk C were evaluated, however, the amount reported corresponds to July 2024.

This classification allows us to more effectively manage the environmental and social risks associated with our operations, ensuring a responsible approach aligned with our sustainability policies.

- We implemented SARAS in 100% of Business Banking operations.
- We started the automation of the SARAS process within the flow of the BIZAGI platform.
- We evaluated 100% of the transactions received from all segments of Business Banking since July 24, 2024.
- We implemented modifications and adjustments in the process to improve the quality of the information.

Equator Principles

Banco de Occidente is not a signatory to the Equator Principles. However, through SARAS, we assess environmental and social risks in Business Banking credit operations, particularly those projects managed by the UFE.

Since these projects typically involve high amounts and activities with a higher propensity for environmental and social risks, the risk categorization form includes a section to assess the amount and phase of the project. If a project is under construction or pre-construction, it is automatically classified as high risk.

In 2024, we evaluated 60% of the operations served by the UFE, identifying two high-risk cases where an environmental and social due diligence report was requested. We are still in the process of reviewing and consolidating information to strengthen our capacity to analyze and mitigate environmental and social risks.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

We promote sustainable businesses

At **Banco de Occidente,** we embed environmental, social, and governance sustainability at the center of our financial decisions. Through our financing strategies, we promote the transition to a more sustainable economy, strengthening the competitiveness of our clients and generating a positive impact on the environment and society.

With this perspective, we offer financing options that allow our clients to incorporate ESG criteria into their economic activities and projects. Not only do we have specific lines, such as **Occiauto Planeta Azul** for the acquisition of hybrid and electric vehicles, but, in essence, any type of credit within our portfolio can be framed as a sustainable solution.











VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

PTo mobilize resources towards projects and assets that generate environmental and social value, we have developed our **Sustainable and Transition Taxonomy,** taking as a reference the **Green Taxonomy of Colombia,** the taxonomy developed together with **IDB Invest** and the **Social Protocol of Asobancaria.**

Our taxonomy is structured in two key dimensions:

Environmental Taxonomy

- Focused on mitigation and adaptation to climate change, water protection, sustainable soil management, conservation of ecosystems and biodiversity, circular economy and other actions that contribute to the preservation of the environment.



Energy Efficiency
- Energy efficiency in equipment or processes.
- Heat recovery.
- Cooling and heating systems.
- Fuel substitution.
- Cogeneration and thermal districts.
- Energy improvements in urban and/or rural infrastructure.

Renewable energy
- Solar power.
- Wind power.
- Geothermal power.
- Energy with biomass.
- Ocean power.
- Hydroelectric power plants.

Sustainable agriculture
- Good livestock practicess
- Sustainable agriculture

Green buildings
- Construction of housing and/ or new buildings.
- Renovation of housing and/or new buildings.
- Sustainable urban developments.

Protection of biodiversity and natural resources
- Sustainable forest management.
- Restoration and/or reforestation of ecosystems.
- Climate adaptation actions.
- Nature-based solutions.

Sustainable transportation
- Hybrid vehicles
- Electric vehicles
- Euro VI technology vehicles
- Dedicated CNG vehicles
- Infrastructure for sustainable transportation

Sustainable water management
- Aqueduct systems, sanitary sewerage and/or wastewater treatment.
- Efficient use of water.

Waste management
- Recycling of materials
- Products with sustainable design and/ or development
- Environmental initiatives developed with food products
- Waste treatment and disposal

Other sustainable investmentss
- Certified sustainable tourism.
- Energy service companies.
- Companies certified in sustainability.
- Other initiatives with environmental impact not listed.

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

Social Taxonomy

- Aimed at generating well-being and improving the quality of life of communities and stakeholders, including initiatives with a gender focus, support for minorities and equitable access to economic opportunities.

With this approach, we reaffirm our commitment to sustainability and continue to promote the development of businesses that build a more resilient and equitable future for all.



Financing of companies that carry out activities with a social focus

Companies that finance or have included in their value chain activities, such as::

- Productive activities of young people between 18 and 28 years of age.
- Activities of women or women microenterprises with productive activities.
- Activities with Senior Citizens (Women: Over 57 years old and Men: Over 62 years old).
- Activities located in vulnerable areas.
- Microenterprises that work with vulnerable communities or in vulnerable areas.
- Projects or activities with small producers in agriculture and/or agribusiness.
- Projects or activities that promote the generation of employability for the sexually diverse population (LGBTIQ+)
- Microenterprises in general.

SME (With a social focus)

- Financing of projects aimed at protecting employment and reactivating companies.
- Financing of projects that contribute to the generation of formal employment, entrepreneurship and labor intermediation of vulnerable people and generation of entrepreneurship in the rural population.

SME owned or managed by women

Eligible expenses include the financing and/or refinancing of costs related to the operation or improvement of productive activity or activities whose objective is to promote equality and human rights throughout the value chain through equitable remuneration, promoting equality and non-discrimination at work, employment of disadvantaged groups, among other causes that seek to help the community.

Affordable basic infrastructure

- Programs and projects that improve the conditions and quality of urban, regional and rural public transport, including improvement of infrastructure, interoperability, reliability of service and transport supply.
- Projects for the construction or improvement of urban and rural access roads and land, river, and maritime transport conditions.

Essential services: affordable housing, education, health services, and water and sanitation.

- Financing of projects and programs aimed at improving the quality of and access to basic, middle, and higher education for vulnerable children and young people.
- Financing for construction, construction improvements and assets in the hospital sector aimed at public and/or private hospitals located in municipalities with multidimensional poverty.
- Financing of actions and measures aimed at the acquisition, construction, repair, expansion, improvement, conditioning or leasing of affordable housing.
- Financing of projects related to the improvement of access, reliability and quality of basic drinking water treatment and distribution services, collection and treatment of wastewater.

Driving the Growth of Our Sustainable Portfolio

At **Banco de Occidente,** we continue to strengthen our commitment to sustainability through the financing of projects and activities with positive environmental and social impact. Based on our sustainable taxonomy, we identified that our **sustainable portfolio** for 2024 reaches **$3.61 trillion,** of which **$3.43 trillion** correspond to own portfolio and **$173.262 billion** to development portfolio.

Within our own portfolio, **25%** is allocated to environmental initiatives, with an emphasis on **Green Buildings and Renewable Energy,** while **75%** corresponds to financing with social impact, focused on **SME owned or managed by Women and Affordable Infrastructure.**

In line with our long-term vision, we have set out to achieve a s**ustainable portfolio of $8 trillion by 2030.** With the results obtained in 2024, we have advanced **43%**[2] **towards our goal,** consolidating our role as a key player in the development of a more sustainable economy.

In addition, we aim to ensure that the share of the sustainable portfolio within our total portfolio continues to grow year after year. Currently, this segment represents **7% of our total portfolio,** and we continue to drive strategies to expand its reach and impact in the coming years.



Sustainable Finance Products and Services

SDG 11; 13.2
| BdO-2; BdO-3; BdO-4; BdO-5; BdO.6 |

At Banco de Occidente, we recognize the critical role we play in the transition to a low-carbon economy and sustainable development. Through our offer of sustainable finance products and services, we seek to promote responsible investments, mitigate risks associated with unsustainable financing and generate value for our clients and society.

Our portfolio of solutions is designed to support companies, consumers and SMEs in the adoption of more sustainable practices, facilitating access to financial resources aligned with environmental and social criteria. From credit lines focused on energy efficiency and sustainable construction to products designed to promote clean mobility and social welfare, our strategy integrates sustainability as a cross-cutting axis in financing.

Below, we detail the main lines of credit and financial products that reflect our commitment to sustainable development:

[2] To meet the goal, we take as a basis the result of our own portfolio without including the development portfolio

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Corporate Finance – Green Loans, Social Loans, Sustainable Loans

Category	Description	Monetary value for fiscal year 2024 (Portfolio Balance) (COP) Full figure.	No. Customers
Green Constructor Line	We finance sustainable construction projects with certifications such as EDGE, LEED and CASA Colombia, promoting efficient buildings with a lower environmental impact.	$227.136.917.248	24
Green Leasing	We finance projects and/or assets that promote sustainability practices within companies, promoting efficiency and reducing environmental impacts.	$ 41.897.806.297	54
Other Corporate Banking Products	Through our ordinary portfolio products, we finance sustainable initiatives and projects aligned with our Sustainable and Transition Taxonomy.	$ 50.071.039.115	9
Other Business Banking Products		$ 38.515.103.327	4
Other Government Banking Products	We support large-scale projects aligned with our Sustainable and Transition Taxonomy, facilitating their development with sustainability criteria.	$565.548.371.950	28
Structured Finance Unit		$188.648.041.344	8
International Business (Foreign Exchange Operations)	We support the growth and development of small and medium-sized enterprises, financing their working capital needs and foreign trade operations.	$ 73.399.120.050	2
Total Sustainable Value		**$1.185.216.399.331**	
Total Value of Corporate Loans		**$33.138.645.951.061** *	
Percentage of total sustainable value over total value		**3.6%**	

* This value corresponds to commercial plus leasing portfolio

In our **Green Constructor Credit line,** we have approved financing for **$920.055 billion in 24 projects** between 2023 and 2024, with disbursements reaching $307.717 billion. This milestone reflects our commitment to sustainability, aligned with Banco de Occidente's strategy and support for projects that promote a greener and more responsible future. We seek to increase our participation in sustainable projects, reinforcing our sustainability policy to reach **$248.828 billion** in financing.

One of the highlights is that the **overdue portfolio in green constructor credit line is 0%,** which shows the commitment of our clients to the fulfillment of their financial obligations.

These projects not only contribute to environmental sustainability, but also generate tangible economic benefits by optimizing the use of **energy, waste, and materials,** aligning with the fight against climate change. Financing sustainable projects boosts economic growth and competitiveness, strengthening the financial ecosystem. Likewise, adopting sustainable practices allows for improved **operational efficiency** and reduced costs, which translates into greater profitability.

With respect to Government Banking, we project total disbursements of **$1.1 trillion,** of which **$262.686 billion (24%)** will be allocated to sustainable financing.

Evolution

- In 2024, we started implementing **sustainable portfolio archetypes.**
- Territorial entities, after the change of government, have reinforced their focus on sustainable projects.
- New legislation is increasingly being implemented to encourage environmental policies.
- Our participation in **COP16** allowed us to strengthen the bank's strategy and define a clear policy to support these projects.



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

Consumer Finance – Sustainable Loans & Mortgages

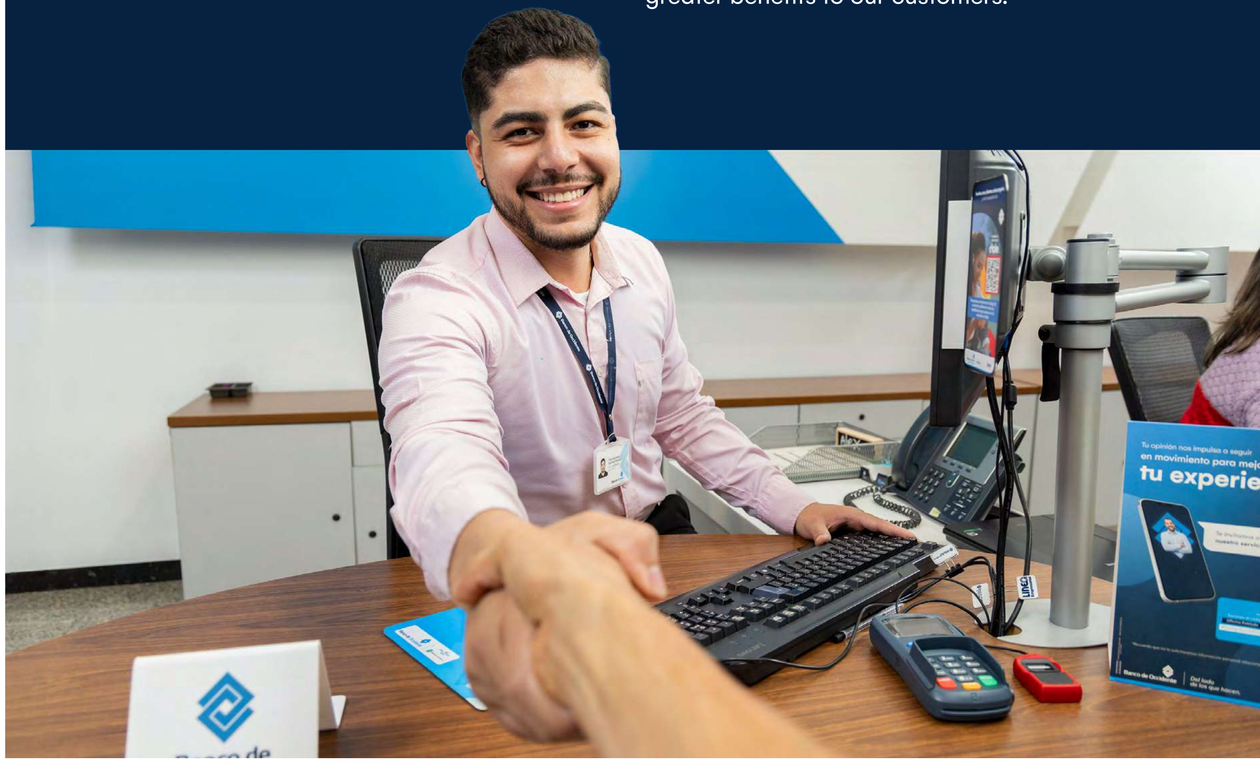
Category	Description	Fiscal Year 2024 Monetary Value (COP) Porfolio Balance Full figure.	No. Customers
Occiauto Planeta Azul	Credit line for customers looking to acquire hybrid or 100% electric vehicles, promoting sustainable mobility and the reduction of emissions.	$190.602.197.022	2.360
Housing Planeta Azul	We finance the acquisition of sustainable housing in surrogate and direct projects, as long as they have sustainable housing certification.	$ 27.433.000.000	120
Solar Power Planeta Azul	We finance the installation of solar panels through personal loans, available in Ordinary Portfolio and Personal Loan Limit.	$89.470.058	2
Total Sustainable Value		**$218.124.667.080**	
Total Value of Personal and Mortgage Loans		**$15.855.089.280.000**	
Percentage of total sustainable value over total value		**1.4%**	

In our **Occiauto Planeta Azul** line, we managed to increase disbursements by 14.48%, reaching $112.667 billion, which is reflected in the growth of the portfolio by 26.34% compared to the previous year. By 2025, we have set ourselves three key goals in the hybrid and electric vehicle sector:

- Increase the amount disbursed by 15%, reaching $129.567 billion, consolidating the growth achieved in 2024.
- Increase the portfolio balance by 20%, exceeding $228.722 billion, strengthening our presence in sustainable mobility financing.
- Maintain competitive conditions with lower rates compared to combustion vehicles, taking advantage of government benefits such as tariff incentives and the exemption of restriction (pico y placa), in addition to the growing offer of brands aligned with the needs of the Colombian consumer.

In 2024, Housing Planeta Azul grew by 170% compared to 2023, exceeding all our expectations and consolidating its position in the sustainable housing market. This result reflects the growing demand and effectiveness of our strategy.

In addition, we implemented the personal loan for solar panels, establishing an alliance with a company specializing in solar energy, to offer greater benefits to our customers.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

SMEs' Loans

Category	Description	Fiscal Year 2024 Monetary Value (COP) Portfolio Balance Full figure.	No. Customers
SME owned or managed by Women	We offer financing to small and medium-sized businesses led by women that meet at least one of the following conditions: **Ownership:** More than 50% of the shares are owned by women. Direction: → More than 20% of the shares are owned by women. → The company has at least one woman in its management body (valid for legal representative). → At least 30% of the board of directors is made up of women. With this line of credit, we reaffirm our commitment to gender equality and the strengthening of women-led companies in the country.	$1.822.369.924.619	11.641
International Business (SME Women Foreign Currency)	We offer lines of credit designed to support the growth and development of small and medium-sized enterprises, financing their working capital needs and facilitating the promotion of their foreign trade operations. With this, we seek to strengthen the competitiveness of SMEs and contribute to their sustainability in the market.	$208.318.401.147	166
Total Sustainable Value		**$ 2.030.688.325.766**	
Total value of loans to SMEs		**$15.035.030.835.532**	
Percentage of total sustainable value over total value		**13.5%**	

Total value od loans to SMEs correspond tothe total value of the commercial portfolio of the Business and SME segment and International Business.

Women-led SMEs

- In 2024, we held the first "Women Who Inspire Progress" event in the country's main cities, with the participation of 47 women business leaders.
- Throughout 2024, we strengthened support for women-led SMEs through specialized training programs, including diplomas, forums, and podcasts on women's business leadership.
- We reaffirm our commitment to female empowerment and its growth. In 2024, the portfolio of Women's SMEs, including development lines, reached 1.9 trillion, representing 13.64% of the total portfolio of the Business and SME segment.

Our goal is to continue positioning our value proposition for Women-led SMEs and strengthen the delivery of specialized benefits. Likewise, to develop training, talks and diplomas focused on the growth and leadership of women entrepreneurs.



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

International Business

We obtained credit lines with correspondent banks for USD 150 million with a sustainable focus and use (environmental and social) for placement in Foreign Currency (ME), strengthening our We Are Sustainable strategy and the growth of our ME portfolio.

In 2025, we will continue working to expand our sustainable lines and alternatives for placement in Foreign Currency (ME), as well as to implement automatic reports to monitor disbursed operations with a sustainable approach and update the ME Format to strengthen traceability and alignment with our sustainability objectives.

Sustainable Loans – Development Portfolio

Categoría	Description	Monetary value for fiscal year 2024 (Portfolio Balance) (COP) Full figure.	No. Customers
Bancóldex (Adelante Sustainable Credit Line)	We offer a special line of credit to finance **circular economy, bioeconomy and climate change management** projects, supporting our clients in the transition to more sustainable and resilient models.	$8.963.312.018	35
Bancóldex (Line of Credit Women Entrepreneurs MSMEs)	We offer lines of credit designed to b**oost women's participation in the country's productive activity,** providing access to financing that strengthens their businesses and contributes to their economic growth.	$1.256.623.180	9
FINDETER	We grant loans to **support various sectors, public and private companies, and territorial entities** in the development of investment projects that contribute to sustainable development.	$98.154.085.465	7
Women's SME Development Portfolio	We provide loans to **women-led SMEs** that meet at least one of the following conditions: **Ownership:** More than 50% of the shares are held by women. **Direction:** → More than 20% of the shares are owned by women. → They have at least one woman in the governing body (valid legal representative). → At least 30% of the board of directors is made up of women.	$64.888.408.511	145
Total Sustainable Value		**$173.262.429.174**	



We offer financing lines for rediscount entities, designed to promote various economic sectors with more favorable and competitive financial conditions. In 2024, through these lines with a sustainable approach, we managed to finance projects and assets with a portfolio balance of **$173.262B,** highlighting key categories such as:

- → Clean transportation
- → Renewable energy
- → Energy efficiency
- → Waste managements
- → Women-led SMEs

We remain committed to strengthening access to sustainable financing, promoting initiatives that generate a positive impact on economic and environmental development.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Digital Transformation

SDG 8.10; 9.3



At Banco de Occidente we have put all our efforts into strengthening the End to End (E2E) digital experience, which has allowed our customers to request and obtain product approval in an agile and efficient way. Thanks to this strategy, we have managed to digitize products such as Credit Cards, Personal Loans, Savings Accounts and CDTs consolidating our commitment to innovation and process optimization.

An important milestone was the integration of the digital flow of Personal Loans with the Bank's traditional system, which eliminated the double filing of data and significantly improved operational efficiency, this improvement will be massively deployed in 2025 for the commercial team, and in the near future we will extend this optimization to Housing and Vehicle products.

We also managed to launch the Digital CDT, allowing our customers to request it in a completely self-managed way through our portal, without the need to go to a branch, this advance is a milestone in the digitization of banking products and lays the foundations for a similar flow in Housing that will be implemented in 2025.

In order to improve the experience of our customers, we have developed more agile digital flows, a clear example is the optimization in the approval of Personal Loans, which is now reduced to only two screens, making the process simpler for both our current and new customers, by 2025, we hope to extend this optimization to Housing, Credit Cards and Vehicles.

- ✔ Token activation without having to go to the office
- ✔ Implementation of the Purchase of Debt with Credit Card and consultation of payment plan for Vehicle Loans, PP and Payroll Loans.

In addition, **we optimized the electronic signature, generating annual savings of $30 million,** and launched the digital payroll MVP, becoming leaders within Grupo Aval.

These advances helped 66% of our sales to be digital in 2024, exceeding our previous goals, with 65% digitization in Personal Banking and 55.2% in Business Banking.

Digital sales have transformed the relationship with our customers, providing more efficient, accessible and sustainable channels, thanks to digitalization, we optimize processes, reduce operating costs and expand our reach, promoting financial inclusion and access to products and services, all while minimizing environmental impact, this evolution not only improves the customer experience, but also strengthens our competitiveness and resilience. In total, we managed to sell 109,506 units of various financial products through digital channels segmented as follows:

Personal Banking

- ✓ Personal Loans: 14,583 approvals.
- ✓ Savings accounts: 29,491 openings.
- ✓ Housing Loans: 1,573 approvals.
- ✓ Vehicle Loans: 10,298 approvals.
- ✓ Credit Cards: 51,011 approvals.
- ✓ CDT: 12 openings.

Business Banking

- ✓ Allied Portfolio: 2,538 openings of savings/checking accounts.

These figures reflect the positive impact of our digital solutions, which allow for more agile and accessible management of the products offered.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Digital Sales

| BdO-1 |

Below, we detail the percentage of participation of each digital channel in total sales:

Channel	Description	Amount	Participation
Digital Campaigns	This channel has proven to be the most effective, due to the ability to generate large volumes of sales through digital strategies.	$ 278.679.294.514	67%
Banking Portal	Although in second place, this channel is still key for those customers who prefer to carry out their transactions through the bank's web platform.	$ 72.552.239.424	17%
WhatsApp	This channel allows for more direct and personalized interaction with customers, making it easier to make simple transactions and inquiries.	$ 51.097.439.111	12%
Mobile Banking	Important channel for customers who prefer to transact through their mobile devices.	$ 14.229.403.663	3%

There are notable differences in sales performance by type of product and channel, highlighting that products such as Vehicles and Credit Cards have a high demand in digital channels, with approvals of 72% and 66%, respectively, while Housing and Personal Loans are more requested in traditional channels.

In 2024, 378,936 customers made digital transactions, reflecting a 30.9% adoption of the bank's platforms, with an average value of $868,901. Customers with income between $2 million and $4 million were the most active, registering 15,274 operations.

Segment	% Participation	% Participation
Semi – Massive	15.274	29%
Preferential	13.055	25%
Preferred Plus	12.346	24%
Select	7.178	14%
Elite	3.991	8%

- **Digital channels were widely accepted, especially for products with high margins such as Personal Loans,** with an average conversion of 38% in all products, and up to 51% in Vehicles and Savings Accounts.

- **We carried out a total of 6,825,926 digital transactions, with a 91% success rate, which demonstrates the effectiveness of our platform,** The average value of transactions was $868,901, with a considerably higher value of $2,125,973 in registered transfers.

- **56% of sales of products such as Personal Loan, Credit Card, Housing and Vehicles were generated digitally,** while 44% came from traditional channels. We invested $1.12 billion in digital guidelines, which allowed us to generate $416 million in disbursements and turnover.

Customer Satisfaction

We measured our customers' satisfaction with digital platforms using the System Usability Scale (SUS), obtaining positive results, the transactional portal achieved a rating of 4.7/5.0, while mobile banking recorded scores of 4.3 on iOS and 4.4 on Android, these results reflect a mostly satisfactory experience.

Despite not having received recurring complaints related to digital sales, we remain committed to continuous improvement. The Customer Experience team has not reported any significant negative feedback that could impact the performance of our platforms, confirming that digitization initiatives are having a positive impact on customer satisfaction and the service provided.

In terms of performance by product, the most sold through digital channels were the Savings Account and the Personal Loan, the latter standing out for its high conversion rate due to its flexibility and ease of access.

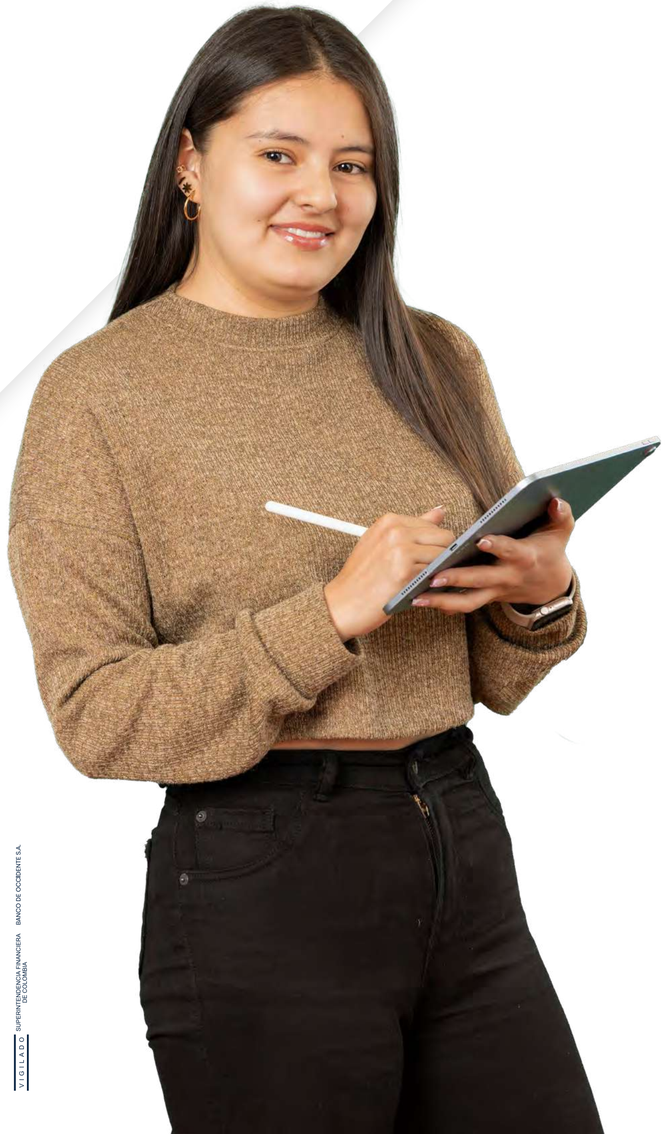
Vehicles and Credit Card products also showed strong digital conversion, with 72% and 66% share respectively, Ireflecting customers' growing preference for making high-value transactions through digital platforms. However, products such as Housing continue to be in greater demand in traditional channels, suggesting that the combination of digitalization and face-to-face support is still key for certain products.

Customers with monthly income between $2 million and $4 million were the most active in the use of digital channels, making a total of 15,274 operations, which shows the growing interest in the convenience and accessibility that these platforms provide to this segment.

This has been a key year in our digital transformation, with a notable increase in digital sales, a strategic investment in marketing, and a constant focus on improving the customer experience.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Challenges

Looking ahead to 2025, we expect digital channels to continue to play a critical role in acquiring new customers and converting sales, especially in key products such as Personal Loans and Vehicles. Continuous optimization of our platforms and customer satisfaction analysis will be essential to maintain and consolidate this success.

Patents, licenses, franchises, trademarks, and other copyrights

Currently, for the normal development of our operations and those of our subsidiaries, we do not have any patents, licenses, franchises or other material copyrights. However, the trademarks that mainly impact the usual development of the entity and its subordinates are listed as follows:

For Banco de Occidente, the following are considered to be material in the operation:

Trademark	Type	Class	Certificate
Banco de Occidente	Mixed	9, 16, 35,36,41	SD2023/0068281CO
Blue Diamond	Figurative	9, 16, 35,36,41	SD2023/0068268CO
Black Diamond	Figurative	9, 16, 35,36,41	SD2023/0068277CO
Supply Factor	Mixed	36	SD2023/0090865CO
Sound	Sound	35,36	SD2023/0068262CO

For Banco de Occidente Panamá, the following are considered material in the operation:

Trademark	Type	Case	Application No.
Banco de Occidente (Panama) S. A	Mixed	36	120087-01

In the case of Occidental Bank (Barbados) Ltd., the following are considered to be material in the operation:

Trademark	Type	Case	Certificate
Occidental Bank Barbados	Nominative	36	363677

For Fiduciaria de Occidente S.A., the following are considered material in the operation:

Trademark	Type	Case	Certificate
Fiduciaria de Occidente S.A.	Mixed	36	148217
Fiduciaria de Occidente S.A.	Mixed	35	148224
FiduOccidente en Linea (the fiduciary's transactional portal)	Mixed	35 and 36	544744
Fiduciaria de Occidente S.A. – Mixed (logo with font and color combination)	Mixed	35 and 36	544620
FiduOccidente (Internet domains)	Mixed	35 and 36	571791

Finally, in the case of Ventas y Servicios – NEXA BPO, the following trademarks are material:

Trademark	Type	Case	Certificate
Workeando	Mixed	35	577813
NEXA BPO	Mixed	35	716647

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. PANAMÁ

Cybersecurity

SDG 16.10

At the Bank we have implemented an information security model aligned with international standards ISO27001–2022 and NIST 800–53, which is composed of policies, standards and procedures focused on protecting the information of both our customers and the entity. These guidelines are documented, approved by our senior management and are carried out within our organization. We regularly review and update this model to ensure that it remains aligned with the Bank's technological advances, thus ensuring a high level of information security and adding value to the commitments we have with our customers, shareholders and the community at large.

In addition, we have an evaluation process in collaboration with the consulting firm Ernest & Young (EY), whose objective is to measure our level of maturity and ensure that the implementation of the model is adequate and timely.



To comply with the provisions of our security model, we have processes, services and tools designed to control cyber risk and we have an incident response plan that seeks to mitigate the impact in terms of availability, confidentiality and integrity of services, in the event of security or cybersecurity incidents.

Regulatory compliance and privacy audits

We rigorously comply with Law 1581 on the Protection of Personal Data, guaranteeing that the collection, storage and processing of our clients' personal data is carried out in full respect of the principles of transparency, legality and security. In compliance with the above we carry out periodic audits in terms of cybersecurity to evaluate the effectiveness of our information leakage prevention (DLP) controls.

Culture of information security and cybersecurity

We ensure that all our employeesare aware of the risks and importance of information security and cybersecurity, for this, we have implemented policies and procedures that allow them to understand and face possible threats.

In addition, we carry out mandatory annual training through the Success Factors platform, where knowledge and good practices on information security are reinforced. If any employeedetects suspicious activity, we have a clear process to report it, detailed in Procedure AVBO–PRSI–SI–002, "Security Incident Report".

In 2024, we trained 5,667 employees through in person talks and reached 5,467 more through the virtual course, thus reinforcing our culture of data protection and security.

Although information security and cybersecurity are not directly included in the performance evaluation, we treat each incident with care, working together with the Human Talent area to evaluate the impact and take the necessary actions, including disciplinary measures if necessary.

Cybersecurity governance

We implement solid contingency and risk management strategies, supported by a specialized team and solid governance that involves those responsible for security, cybersecurity, business continuity and operational risks. In addition, at the time of subscribing services, our clients are duly informed about the current privacy policies, which reinforces our commitment to the protection of their information.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

In addition, we implement continuous awareness campaigns on the main cyber risks to mitigate possible threats to information security.

To address these risks in a comprehensive manner, we have a Security Committee that meets monthly, composed of the Vice President of Risks, responsible for the areas of Information Security, Operational Risk and Business Continuity, and the Vice President of Operations and Technology, Pedro Villegas, who fulfills the role of Chief Technology Officer (CTO) and Chief Information Security Officer (CISO). In the same way, he is in charge of supervising the Technology Management, which is responsible for Cybersecurity in the Bank. At the meetings held, the initiatives in progress are reviewed, an exhaustive monitoring of the risks identified and their mitigation is carried out, and the incidents that have occurred are evaluated, which ensures robust protection of information and operational continuity. Both Vice-Presidents have extensive previous experience related to their responsibility within the financial sector.

IT security, cybersecurity processes and infrastructure

We have established business continuity plans and incident response procedures, which are tested at least twice a year Although we do not have certifications such as ISO 27001 or NIST, we follow the ISO 27001:2022 framework, evaluated annually by E&Y. In addition, we manage vulnerabilities using tools such as Qualys and apply a due diligence process with our suppliers to ensure compliance with security standards.

Information security breaches	2023	2024
Total number of information security breaches	430	1292
Total number of customers, consumers, and employees affected by the breaches	7	3

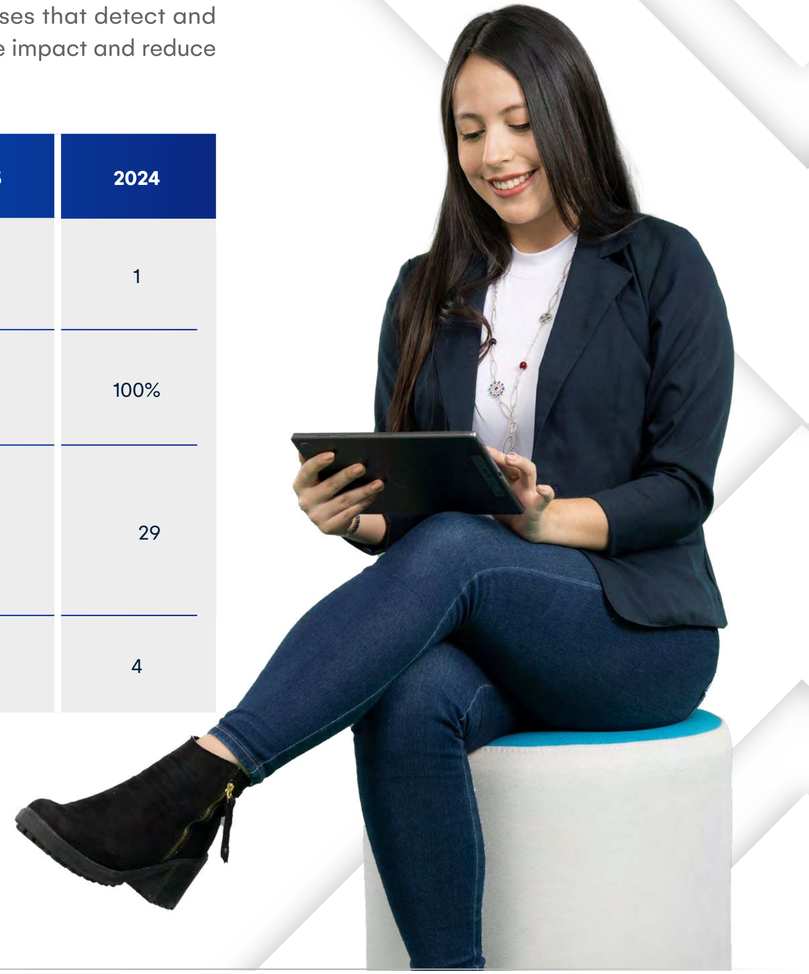
Customer privacy

| GRI 418-1 |

In 2024 we received 4 complaints from regulatory bodies, which is a decrease from the 7 we received in 2023 and 2022, indicating an improvement in incident management through the implementation of more effective internal processes that detect and respond quickly to data breaches. This allowed us to contain the impact and reduce the number of affected data subjects.

Type	2022	2023	2024
Total number of data breaches identified during the reporting period.	1	0	1
Percentage of data breaches in which personally identifiable information (PII) was the subject of the data breach.	100%	0	100%
Total number of unique account holders who were affected by data breaches, which includes all those whose personal data was compromised in a data breach.	4.000	-	29
Total number of complaints received from regulatory bodies.	7	7	4

We implement continuous awareness campaigns on the main cyber risks to mitigate possible threats to information security.



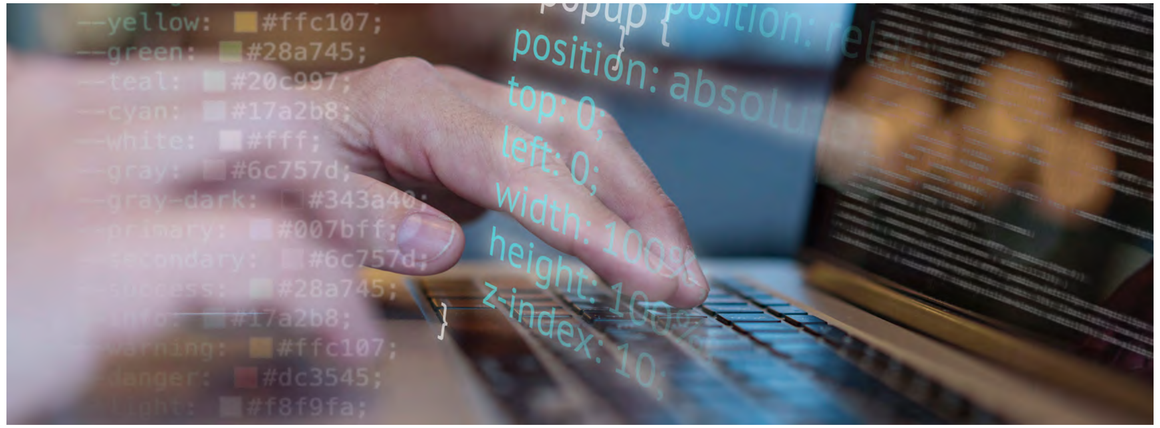
VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Achievements

- We have achieved 100% of the authorizations for the processing of personal data of our active customers, ensuring their consent in accordance with the current clause, the authorization for commercial management and the permitted contact channels.
- We carried out three trainings aimed at all Bank employees, ensuring that everyone was aligned with the knowledge and compliance with these policies.

Challenges

Integrating Artificial Intelligence and new technologies in the management of personal data, which will allow us to improve the experience of our customers, managing their data more efficiently, offering more personalized attention and optimizing operational efficiency through automation in the management of this data.



Software legality

In compliance with the provisions of Law 603 of 2000, Banco de Occidente has defined policies, controls and sanctions to guarantee the legality of the software used. The controls for the acquisition, development and maintenance of the software, in accordance with the legal requirements on copyright, privacy and electronic commerce, are mandatory for compliance by the responsible areas. In this regard, the internal audit carries out continuous monitoring to verify adequate compliance with the regulations.

On the other hand, in IT there is a licensing area that manages the SW that has an associated licensing and for the SW Free there is a review and approval flow in which IT Architecture and Information Security participates through the IT services portal. This review allows these utilities to be included in the bank's utility catalog and facilitates new requests.

We can confirm that since 2003 the Bank has had the information security model that includes the policies, standards and procedures that define the information security governance that must be complied with by employees and contracted third parties; in particular, the following definitions are available in the Information Security Manual:

Policy: Compliance with regulations.

At Banco de Occidente we must comply with local and international regulations on privacy and information security.

The Information Security and Cybersecurity Policy is in line with and supports compliance with local and international laws and regulations regarding information security. Therefore, such requirements must be included in the development of the security model and specific actions must be taken to keep the Bank permanently aligned with such provisions. Examples of such provisions are bank reserves, software licensing, circulars from the Finance Superintendence of Colombia and those from international groups such as the Basel Group for the Supervision of Financial Institutions.

In addition, and in order to maintain a good level of security, this policy must be based on best information security practices, such as ISO 27001:2015 and ISO 27032:2013 / NIST 800–53.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A.



Standard: Compliance with legal regulations and external regulations

Any rule, regulation or contractual requirement for each computing resource must be explicitly defined and formally documented. There must be documents that establish how Banco de Occidente's computer resources comply with any internal or external regulations, rules or contractual requirements.

Standard: Copyright enforcement

The installation, reproduction, use and storage of software, multimedia files and external information in the Bank's computer resources must be previously authorized and must comply with the legal requirements that enable their use. Appropriate procedures should be put in place to ensure compliance with legal restrictions on the use of material that may be subject to intellectual property rights such as copyright and design rights.

Standard: Installation of authorized software

The software that resides in the institution's computer resources may only be authorized by Banco de Occidente. Software that is not registered and authorized may not be installed or run on Banco de Occidente's computer resources.

Minimum security and quality requirements for information handling.

Currently, Banco de Occidente can confirm compliance with the numerals required by the Finance Superintendence of Colombia in the face of the latest update of External Circular 029 of 2019 chapter I "Channels, means, security and quality in the management of information in the provision of financial services." It is possible to maintain compliance with each of the requirements defined therein and in particular with the use of biometrics as a differentiating element in the process of authenticating the identity of customers and users, through the use of the technological solution provided by the National Registry of Civil Status and Certicamara for this purpose.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Strong **Governance** and Ethical Leadership



Great Place To Work. Certificada AGO 2024-AGO 2025 COL

EL MEJOR LUGAR PARA TRABAJAR EN COLOMBIA #1

Banco de Occidente | Grupo AVAL

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



SDG 17.5

Our corporate governance is essential to ensure responsible, transparent management aligned with the highest national and international standards. In 2024, we continued to consolidate our governance structure with an ethical and sustainable approach, implementing new measures such as the creation of a Sustainability Committee that oversees our ESG practices. In addition, we strengthened transparency by publishing annual impact reports and implementing independent external audits. With these actions, we guaranteed the protection of the rights of our shareholders, investors, employees, local communities and other stakeholders, reaffirming our commitment to an inclusive and responsible model.

In this chapter, we present the practices, policies and actions implemented in the field of corporate governance, as well as the results obtained, in coherence with the principles of transparency, integrity and responsibility that guide our management. Through this approach, we seek to strengthen our position as a solid financial institution, committed to the economic and social development of the country, while generating long-term sustainable value.

In 2024 we elaborated the Corporate Governance Report for 2023, which seeks to reflect how through the implementation of the 148 recommendations of the "Country Code" we ensure transparency, ethics and accountability in companies. At the Bank we achieved an adoption rate of 87.3% (implementation of 130 recommendations) which shows our commitment to best practices in governance, This not only improves the confidence of investors and other stakeholders, but also promotes a strong and responsible organizational culture.

> Our corporate governance is essential to **ensure responsible, transparent management** aligned with the highest national and international standards.

Corporate Governance Structure

| GRI 2-9 |

General Shareholders Assembly

Our shareholding structure is composed of the following entities:

For detailed information, you can consult our website and the Finance Superintendence of Colombia, where this information is publicly available.

NIT	Company Name	No. Common Shares	% Part.
800.216.181-5	Grupo aval acciones y valores S.A.	112.671.465	72.27%
900.257.179-8	Inversiones escorial	9.572.503	6.14%

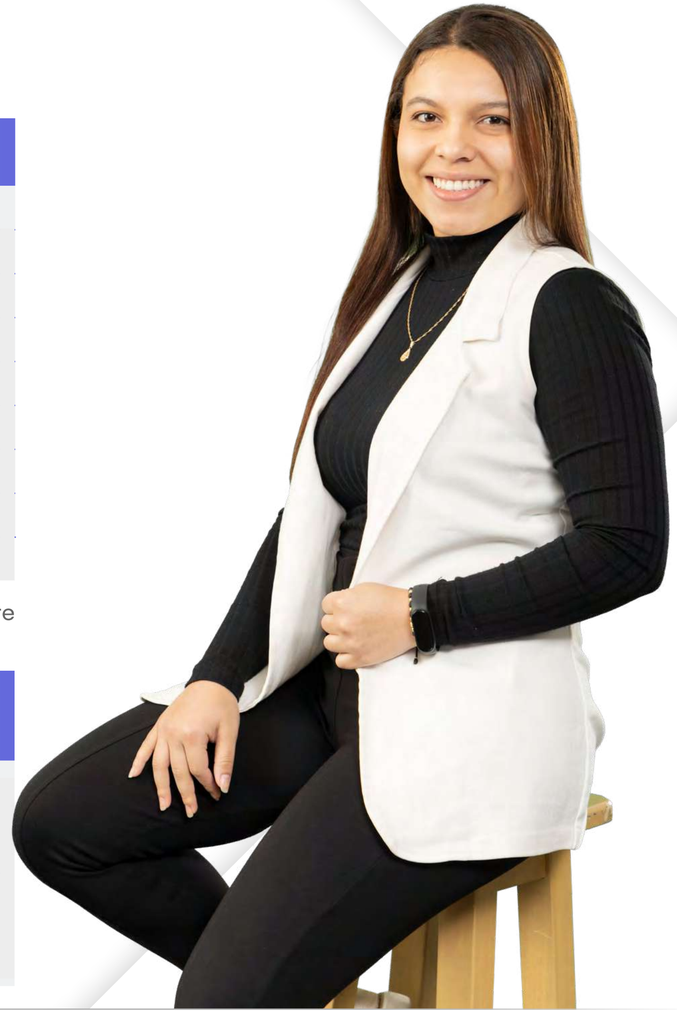
Information on the shares owned by the members of the Board of Directors.

Shares in a personal capacity:

Name	Shareholder	Number of shares	% Participation
Ivan Felipe Mejia Cabal[1]*	Yes	9.363.231	6.00%
Felipe Ayerbe Muñoz[2]	Yes	31.509	0.02%
Ricardo Villaveces Pardo	Yes	456	0.0002%
Jose Carlos Santander	No	-	-
Mauricio Gutierrez Vergara	Yes	259	0.0001661%
Mauricio Irragori Rizo	No	-	-
Eduardo Herrera Botta	No	-	-
Eduardo Duque Suarez	No	-	-
Maria Fernanda Mejía de Juri	No	-	-

Companies that are shareholders of the Bank and of which the members of the Board of Directors are members:

Name of the company	Member of the Board of Directors	Number of shares	% Participation
Induvalores S.A.S	Ivan Felipe Mejia	2.721.725	1.7458178%
J.V Ayerbe SAS	Felipe Ayerbe Muñoz	8.303	0.0053259%



[1] *As of the date of submission of this report, Director Iván Felipe Mejía Cabal has a 6% stake in the Bank's shares.
[2] *As of the date of submission of this report, the following relatives within the second degree of consanguinity of Director Felipe Ayerbe Muñoz, have shareholdings expressed in the following percentages:
Rodrigo Ayerbe Muñoz — 0.0195530%
Juan José Ayerbe Muñoz – 0.0184125%
María del Socorro Ayerbe Muñoz –. 0.0186607%

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



During the event, shareholders were **provided with all the information necessary** for decision-making.

We have two significant shareholders who are Grupo Aval Acciones y Valores S.A. and Inversiones Escorial S.A. The two companies are part of the Business Group Situation that was configured on December 31, 2018, whose controlling party is Luis Carlos Sarmiento Angulo, in his capacity as a natural person, to the extent that the existence of unity, purpose and direction was determined, since all of them respond to its guidelines and develop their respective corporate purpose based on common objectives.

We held the Shareholders Assembly on March 20, 2024 in person at the Bank's registered office, located in Cali (Colombia). The meeting was held in accordance with the applicable regulatory provisions, as well as the Bylaws, the Regulations of the General Shareholders Assembly and other internal regulations of the Bank. During the event, shareholders were provided with all the information necessary for decision-making. Both our Presidency and the Assembly had a participation of 148,745,581 shares represented out of a total of 155,899,719 subscribed and paid, that is, the percentage of participation was 95.41%.

The measures adopted during the year to encourage shareholder participation were a direct communication by the President and Secretary of the assembly.

Regarding the information or requests submitted by shareholders, the management of the previous president Mr. Cesar Prado Villegas was exalted and the work carried out by the current president Mr. Gerardo Silva in the months he had been in the Presidency was exalted, they also mentioned that they were proud that the Bank was managing ESG and sustainability issues, actions that will allow the Bank to position itself and make its presence more profitable in front of investors.

The Assembly developed a precise agenda in accordance with the legislation in force on the matter. Among the main agreements made are: approval of Financial Statements, election of the members of the Board of Directors and their remuneration; Election of the Main and Alternate Statutory Auditor; the approval of the Profit Distribution Proposal; Approval of the Bylaw Reform related to the composition of the Board of Directors, among others.

With respect to the tax audit, in 2024 the firm KPMG S.A.S was involved, for which the Assembly approved fees for a value of $3.618B.

Finally, during 2024, requests were received from shareholders, related to the payment of dividends, transfers of shares, request for tax certificates, among others, which were fully answered.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Board of Directors

| GRI 2-9 |



During the period from January to March 2024, the Board of Directors was composed of five (05) main members and five (05) alternates. At the General Shareholders Assembly, we approved a bylaw reform that modified the structure of the Board, leaving it made up for the period from March 2024 to March 2025 by nine (09) members, without alternates. As established in the Bylaws, the deliberative quorum is made up of the presence of the majority of Directors.

At the Bank we have three Support Committees of the Board of Directors:

- Audit Committee: this committee is in charge of generating reports based on transparency and detecting opportunities for improvement that contribute to the optimization of processes and is carried out quarterly.

  It is composed of three (3) members of the Board of Directors who have experience, and know, among others, accounting, financial and other matters associated with the functions assigned to the Audit Committee and are independent. During the period covered by the report, nine (09) sessions were held, of which seven (07) were regular and two (02) special.

- Comprehensive Risk Committee: is responsible for monitoring the result of the risk profile and appetite, advising the Board of Directors on operations, events or activities, including the incursion into new ones, that may affect the entity's exposure and risk profile, approving adjustments and changes to SIAR policies, monitoring the state of the risk culture in the entity, evaluating the analysis of the results of the monthly risk management reports, among others. It is also responsible for promoting the adaptation of risk management in society to an advanced model that allows the configuration of a risk profile in accordance with strategic objectives, validating reviews of the positive and negative impacts generated by social and environmental issues, supervising compliance with the comprehensive management of climate change risk and being present in the accountability of the SARAS Environmental and Social Risk Management System. It is held quarterly.

  It is composed of eleven (11) members, of which nine (9) are members of the board of directors, at least one of them independent, the other two (2) members are the President and the Vice President of Risk and Collections of the Bank. During 2024, three (03) regular sessions were held.

- Appointments, Remuneration and Corporate Governance Committee: it is the one that supervises and manages various key areas, related to the management of high-level personnel, salary policies and the governance structure of the entity, within its functions are:
  - Propose or review appointments of key managers and members of senior management, as well as other strategic positions within the Bank.
  - Ensure that remuneration is aligned with the entity's strategic objectives, incentivizing adequate performance and responsible management.
  - Evaluate and propose improvements to the governance structure, including the composition of the board of directors and internal committees.

  This committee is held quarterly and is composed of five (5) members appointed by the Board of Directors, of which three (3) are members of the Board of Directors, most of them independent, the other two (2) are the President of the Bank and the Legal Vice President with their alternates Vice President of Companies and Vice President of Human and Administrative Talent, respectively. Three (03) regular sessions were held of this committee.

The inclusion of independent members in committees is essential to ensure effective governance and impartiality in decision-making, these members, having no direct ties to the organization, bring an objective and disinterested perspective, which allows situations to be evaluated in a more equitable and transparent manner. Their independence ensures that decisions are made without external influences or conflicts of interest, which strengthens internal control, fosters shareholder and investor confidence, and facilitates compliance with best governance practices and regulations. In this way, they contribute to the proper functioning of the Bank by protecting its long-term interests and promoting ethical and responsible management.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



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

Board member appointment process

| GRI 2-10 |

The process for appointing the members of the Board of Directors was carried out in accordance with the provisions of the Bylaws, and was carried out during the General Shareholders Assembly on March 20, 2024. In that Assembly, the electoral quotient system was applied, which consists of dividing the number of votes obtained by each candidacy by the total number of seats available in the constituency, a key mechanism for the proportional allocation of seats. For the statutory period between March 2024 and 2025, the Board of Directors was formed in accordance with the lists presented by Grupo Aval Acciones y Valores S.A., of which seven (07) lines are independent, thus ensuring adequate representation and balance within the governing body.

Subsequently, the legal procedures to take office were carried out before the Finance Superintendence of Colombia, which were duly approved. This process, carried out with total transparency, reinforces the reliability of the decisions taken and ensures that the governance structure is aligned with the country's regulations, providing our shareholders and investors with the certainty that we are committed to best practices and compliance with current legislation.

Below, we describe the composition of the Board of Directors, with the date of the first and appointment and the type of director:

January — March 2024

	Main	Year of appointment	Type
1	José Carlos Santander Palacios	2019	Equity
2	Ricardo Villaveces Pardo	1991	Independent
3	Iván Felipe Mejía Cabal	1996	Independent
4	Felipe Ayerbe Muñoz	1993	Independent
5	Liliana Bonilla Otoya	1999	Independent

	Main	Year of appointment	Type
1	Mauricio Gutiérrez Vergara	2008	Equity
2	Adolfo Varela González	2012	Independent
3	Eduardo Herrera Botta	2015	Independent
4	Gilberto Saa Navia	1999	Independent
5	Mauricio Iragorri Rizo	2014	Independent

March 2024 — March 2025

	Main	Year of appointment	Type
1	José Carlos Santander Palacios	2019	Equity
2	Ricardo Villaveces Pardo	1991	Independent
3	Iván Felipe Mejía Cabal	1996	Independent
4	Felipe Ayerbe Muñoz	1993	Independent
5	Mauricio Gutiérrez Vergara	2008	Independent
6	Eduardo Herrera Botta	2015	Independent
7	Mauricio Iragorri Rizo	2014	Independent
8	Eduardo Duque Suárez	2024	Equity
9	María Fernanda Mejía de Juri	2024	Independent



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Changes in the Board of Directors during the Fiscal Year

| GRI 2-10 |

At the General Shareholders Assembly held on March 20, 2024, taking into account the list presented by Grupo Aval Acciones y Valores S.A., the following Board of Directors was elected with the favorable vote of 94.40% of the stock capital for the period April 1, 2024 – March 31, 2025:

Board of Directors 2024 – 2025
José Carlos Santander Palacios
Ricardo Villaveces Pardo *
Iván Felipe Mejía Cabal *
Felipe Ayerbe Muñoz *
Mauricio Gutiérrez Vergara *
Eduardo Herrera Botta *
Mauricio Iragorri Rizo *
Eduardo Duque Suárez
María Fernanda Mejía Castro *

* Independent Member

We complied with clear and transparent criteria for the appointment and selection of the members of its highest governance authority, ensuring that the process considers various aspects relevant to the development of the organization. In accordance with Article 28 of the bank's bylaws, it is the responsibility of the Shareholders Assembly to freely appoint and remove the members of the Board of Directors, accept their resignations and fill vacancies. This process is carried out after a thorough review by the Appointments, Remuneration and Corporate Governance Committee, which assesses the suitability of the candidates and their independence rating. The Board of Directors, or shareholders directly, present the proposals to the General Shareholders Assembly, ensuring that fundamental aspects such as stakeholder opinions, diversity, independence and the competencies necessary to address the Bank's impacts are taken into account.

Independence criterion

Board members or applicants must declare that they are not:

- Employees or directors of the Bank or of any of its affiliates, subsidiaries or controlling companies, and have not held such status during the year immediately prior to this appointment.
- Shareholders who directly or by virtue of an agreement direct, guide or control the majority of the Bank's voting rights or who determine the majority composition of the Bank's administrative, management or control bodies.
- A member or employees of associations or companies that provide advisory or consulting services to the Bank or of companies belonging to the same economic group of which it is a part, when the income from such concept represents twenty percent (20%) or more of their operating income.
- Employees or directors of a foundation, association or company that receives important donations from the Bank (Important donations are considered to be those that represent more than twenty percent (20%) of the total donations received by the respective institution).
- Administrators of an entity on 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.

We complied with clear and transparent criteria for the appointment and selection of the members of its highest governance authority



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Resumes of the members of the Board of Directors statutory period March 2024 to March 2025.

Note: Experience is as per the GICS classification by the Dow Jones.
*Porcentaje desde su posesión como miembro de junta ante la Superintendencia Financiera

José Carlos Santander Palacios

Age: 78 years old
Main Member
Economist from Universidad América.
Main Member of the Board of Directors of Banco de Occidente since March 2019. Previously, he was a member of the Boards of Directors of Fiduciaria de Occidente, Corficolombiana, Banco de Occidente Panama Leasing de Occidente, among others.
IFC ESG Director Training Certificate:
- Educational Institution: Bank of Commerce — Chase Manhattan Bank.
- Career or study name: Financial analysis and technical banking.
- Affinity Study: Financial Sciences.

96% attendance at sessions

Ricardo Villaveces Pardo

Age: 75 years old
Main Member
Industrial Engineer from Universidad de los Andes. Since 1991 he has been a member of the Board of Directors of Banco de Occidente, and additionally, he has been a member of the Board of Directors of: Global Seguros de Vida S.A., Fiduciaria Renta 4–Global S.A., Identidad Digital S.A.S, Fedesarrollo and Colfuturo.
- Career or Study Name: Cybersecurity and Privacy for Business.
- Expertise in: Sustainability and Cybersecurity.

96% attendance at sessions

Iván Felipe Mejía Cabal

Age: 77 years old
President of the Board of Directors
Main Member
Entrepreneur
He has been a member of the Board of Directors of Banco de Occidente since 1996 and of the Boards of: Ingenio Providencia, Chamber of Commerce of Palmira and Industrias de Envases.
83% attendance at sessions

Felipe Ayerbe Muñoz

Age: 74 years old
Main Member
Lawyer from Universidad de los Andes, with Specializations in Commercial Law from the National University of Colombia and Comparative Law from New York University.
He has been a member of the Board of Directors of Banco de Occidente since 1993 and of the Boards of: Plásticos Flexibles, Productos Coldecom.
96% attendance at sessions

Mauricio Gutiérrez Vergara

Age: 66 years old
Main Member
He is a doctor from Universidad Javeriana de Bogotá, with specializations in Arthroscopic Surgery from New York University, Orthopedics and Traumatology from Universidad Javeriana and has studied Personalized Coaching, Investment Banking and Business Management.
He is a member of the Financial Committee, the Credit Committee and has been a member of the Board of Directors of Banco de Occidente since 2008. He currently belongs to the Boards of Directors of the Colombian Society of Orthopedic Surgery and Traumatology Scott, the Latin American Society of Knee Arthroscopy, the Latin American Society of Arthroscopy; Knee and Sport, and is a member of the Financial Committee of the Imbanaco Medical Center and Promédico.
IFC ESG Director Training Certificate
- Educational Institution: Universidad Javeriana
- Career or Study Name: Personalized Coaching Investment Banking and Business Management
- Expertise in: Banking

100% attendance at sessions

Eduardo Herrera Botta

Age: 67 years old
Main Member
Industrial Engineer from Pontificia Universidad Javeriana in Bogotá, with a Master's Degree in Administration and Finance and a Specialization in Marketing from EAFIT Medellín.
Currently, he is a member of the Boards of Directors of: Grupo Fanalca, Alianza Fiduciaria, Imecauca, Zona Franca Palmaseca, Ciudad Limpia, RF Comunicaciones and ANDI. Member of the Board of Directors of Banco de Occidente since December 10, 2015 and currently serves as President of SUPERTEX S.A.
- Knowledge in: Foreign Trade

87% attendance at sessions

Mauricio Iragorri Rizo

Age: 58 years old
Main Member
Industrial Engineer from the University of Georgia, CEO's Management Program of Kellogg School of Management, He has served as a Factory Engineer, Head of Costs, Deputy Manager of Operations, Commercial Manager and today, General Manager of Mayagüez S.A.
He has been a member of the Board of Directors of Banco de Occidente since June 18, 2014
IFC ESG Director Training Certificate.
- Educational Institution: Kellog School of Management
- Career or Study Name: CEO'S Management program

91% attendance at sessions

Eduardo Duque Suárez

Age: 59 years old
Main Member
Economist from Universidad de los Andes with more than 27 years of experience in financial sector entities around risk supervision, adoption of Basel III principles, complex and transformational episodic transactions in corporate and consumer banking, corporate finance, and investment banking in Latin American markets. He is currently the Corporate Vice President of Risks of Grupo AVAL Acciones y Valores S.A.
100% session attendance*

Maria Fernanda Mejía de Juri

Age: 65 years old
Main Member
Public Accountant from Pontificia Universidad Javeriana with Training in External Auditing, Certified Management Systems, Corporate Governance, Corporate Social Responsibility and Family Businesses. She has extensive administrative and commercial experience. She currently serves as chair of the Board of Directors of the Casa de Colombia Foundation, Leader of the Association of Consular Ladies of Cali, member of the Financial Committee of the Tobías Emmanuel Institute, member of the Financial Committee of the Casa de Colombia Foundation, and member of the Treasury Committee of the Liceo de La Amistad.
- Educational Institution: Colombia Capital Program
- Career or Study Name: Bond Issuance and Securities Market Information Mechanisms
- Educational Institution: Ernst & Young
- Career or Study Name: Transfer Pricing

100% session attendance*

*Percentage since her possession as a board member before the Finance Superintendence

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Members of the management of the parent company who also hold positions on the Boards of Directors of subordinate companies or in executive positions within them

| GRI 2-11 |

The following table lists the Bank's administrators who are part of the Board of Directors of the parent company and the Affiliates of Banco de Occidente

Name	Position held at the Bank	Entities in which they hold the position of Director
Douglas Berrío Zapata	Legal Vice President	→ Main Member Fiduciaria de Occidente S.A → Director at Occidental Bank Barbados Ltd. → Director at Banco de Occidente (Panama) S.A → Alternate Member of Sociedad Administradora de Fondos de Pensiones y Cesantías Porvenir S.A.
Mauricio Maldonado Umaña	Vice President of Finance and Strategy	→ Main Member Fiduciaria de Occidente S.A. → Director at Occidental Bank Barbados Ltd. → Director at Banco de Occidente (Panamá) S.A → Main Member Ventas y Servicios S.A. → Member of the Board of Directors of A TODA HORA S.A. (until September 2024)
Ivan Mauricio Ricardo Arias	Vice President of Businesses	→ Main Member Fiduciaria de Occidente S.A.
Johnny Leyton Fernández	Vice President of Risk and Collections	→ Main Member Fiduciaria de Occidente S.A. As of the date of submission of this report, Jonny Leyton retired from the Bank as indicated in paragraph r.
Pedro Luis Villegas	Vice President of Operations and Technology	→ Alternate Member Fiduciaria de Occidente S.A. → Alternate Member Ventas y Servicios S.A.
Juan José Lalinde Suárez	Vice President of Government Banking	→ Alternate Member Fiduciaria de Occidente S.A.
Eduardo Alfonso Correa	Vice President of Human and Administrative Talent	→ Main Member Ventas y Servicios S.A.
Julián Sinisterra Reyes	Vice President Commercial Personal Banking	→ Alternate Member Ventas y Servicios S.A. → Alternate Member Fiduciaria de Occidente → Credential Board of Directors → Main Member Banco de Occidente (Panama)
Alejandro Cardeñosa Monroy	Legal Manager of Personal Banking	→ Alternate Member Ventas y Servicios S.A.
José Carlos Santander	N/A	→ Main Member of the Board of Directors of Banco de Occidente → Director at Banco de Occidente (Panama) S.A.

Letter r. Changes in the Bank's Structure and Senior Management Members
The Board of Directors in a session on August 23, 2024 accepted the resignation of Johnny Leyton Fernández due to his retirement and appointed Fabián Mauricio Arias as Vice President of Risk and Collections to replace him.

On the other hand, the members of the Board of Directors of Grupo Aval Acciones y Valores S.A. are not members of the Boards of Directors of Banco de Occidente's affiliates nor do they hold a management position in any of them.

Functions of the Board of Directors

GRI 2-12; GRI 2-14

Our Board of Directors meets biweekly, and during the period covered in this report, policies, guidelines, and decisions related to the social, economic, and environmental impact of the Bank's operations on our stakeholders were approved.

Among the functions of the Board of Directors is to present to the General Shareholders Assembly, together with the Bank's senior management, the reports and balance sheets for each year and the profit distribution proposals, accompanied by a report on the progress of the business and general situation of the entity, within which there is a sustainability chapter with the information reported herein.

During 2024, all the regular sessions scheduled for the year were held, and 4 additional sessions that were held in a special manner. The Board of Directors has held four (04) special sessions.

The functioning of our Board is framed in the:
Regulations of the Board of Directors

Among the most notable decisions made in 2024, we include:

- ✓ Sustainable Credit Line granted by Citibank to the Bank, for USD50 Million. This sustainable line with a social focus aims to support the Growth and Development of Small and Medium-sized Enterprises in Colombia — SMEs.
- ✓ Approval of a donation of $300,000,000 to Propacífico, whose purpose is to support the development of the programs of the Compromiso Valle initiative: food security, transformation of life projects, employability, solid leadership and entrepreneurship.
- ✓ Approval of a donation of $20,000,000 to the organization Tecnocentro Somos Pacífico, with the aim of improving the quality of life of 50 seniors, through artistic practices that preserve their cultural identity, the development of skills and the strengthening of their livelihoSDG, for those who live in vulnerable sectors of Eastern Cali. No.1671.
- ✓ Homologation of attributions to the Management of Administrative Resources to be able to deregister and destroy returned assets and dations in payment for final disposal, or when they are not expected to have future economic benefits, so as not to have to require presentation to the Board of Directors.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

The Board approved the initial strategy for the use of resources presented by the treasury: which consists of converting the resources obtained in the placement of the bond into pesos and making the respective hedge once the dollars are brought in.

- Authorization for the issuance of subordinated bonds up to an amount of two hundred million United States dollars with a loss-absorbing mechanism under the regulation of the State of New York, United States and with the intention of computation in the additional equity of the Bank.
- Subordinated bonds — use of resources: The Board approved the initial strategy for the use of resources presented by the treasury, which consists of converting the resources obtained in the placement of the bond into pesos and making the respective hedge once the dollars are brought in.
- We approved the Update of the Internal Audit Bylaws, Regulations of the Audit Committee of the Board of Directors, MAN-APY-252 Methodology and Assurance of Audit Processes.
- We approved the CAMEL limits for National Banks, Financing Companies, Financial Corporations and Special Official Institutions with a cut-off validity of six months.
- We approved the modifications to the Code of Ethics and Conduct, of which we highlight:
  - Updating concepts in the content of the document.
  - Updating of the Ethical Principles, in line with the principles contained in the Code of Ethics and Conduct of Grupo Aval.
  - Inclusion of the concept of Conduct Risk.
- Approval of the Banco de Occidente Pensioners Policy, highlighting the following points:
  - Accompaniment of employees in the stage prior to meeting the legal requirements to access the recognition of old-age pension.
  - Rules applicable to employees when pension requirements are met.
  - Exceptions applicable to management, trust and management employees.

Senior Management

| GRI 2-13 |

LSenior Management is responsible for the administration of our Bank, leading the implementation of the corporate strategy and sustainability practices that generate value for both the company and our stakeholders. Likewise, it reports to the Board of Directors and, in conjunction with it, to the General Shareholders Assembly on the progress and results achieved. This is done in accordance with chapter three of the Code of Good Corporate Governance: “Mechanisms for the evaluation and control of the activities of administrators, main executives and directors”.

The Board of Directors in a session held on August 23, 2024, accepted the resignation of Johnny Leyton Fernández due to his retirement and appointed Fabián Mauricio Arias as Vice President of Risk and Collections to replace him.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

The Bank's Vice-Presidencies correspond to the following:

Vice-presidency	Vice-president
Vice-Presidency for Finance and Strategy	**Mauricio Maldonado Umaña** Industrial Engineer and MBA Bank Experience: 6 years Previous experience at Grupo Aval: 12 years Guides and directs the financial policies and procedures that allow the fulfillment of planning objectives Budgeting, financial analysis, pricing, profitability, accounting and taxes, as well as corporate transformation in line with the strategy defined for the business, through project guidance and monitoring of high value in both profits and efficiency capture, advanced analytics, data governance, the development of increasingly digital services and the deployment of the strategy seeking alignment and appropriation by the employees of our Bank.
Legal Vice-Presidency	**Douglas Berrío Zapata** Lawyer Bank Experience: 34 years Responsible for advising, directing and coordinating, the aspects in which our Bank and its Affiliates have to do with the national and international legal system, contributing to the defense of their interests before any body, as well as to the normalization and/or recovery of the portfolio of companies.
Commercial Vice Presidency Personal Banking	**Julián Alfonso Sinisterra Reyes** Business Administrator Bank Experience: 4 years Previous experience at Grupo Aval: 8 years Responsible for defining strategic plans that allow the development of lasting and profitable relationships with affluent individuals, originating in places where demand is generated (Vehicle Dealers and Construction Companies) and deepened through a value proposition of service and investment, financing and insurance products. In addition, responsible for customer segmentation, value proposition development, product profitability measurement, business intelligence, customer experience monitoring, customer experience development services and monitoring of these in the different physical and electronic channels, as well as the definition of strategies for activation, use and billing through Credit and Debit Cards, as well as the generation of profits by return of commissions, as a result of the placement of insurance policies that minimize the risk exposure of the Bank and our clients.
Vice-Presidency of Businesses	**Iván Mauricio Ricardo Arias** Economist and International Negotiator, with a Master's Degree in Finance. Industry experience: 20 years Bank Experience: 4 years Responsible for planning and directing policies and strategies related to the Business market, focused on the growth of Assets (placements) and Liabilities (Deposits) in the Government, Corporate and Business (SMEs) segments.









VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA









Vice-presidency	Vice-president
Vice-Presidency for Finance and Strategy	**Eduardo Alfonso Correa Corrales** Industrial Engineer Experience at the Bank: 45 years Responsible for managing, planning and directing the policies that allow providing and maintaining in the organization a motivated, trained, adaptable to change and customer-focused human resource to achieve corporate objectives. It also guides the purchasing processes and is responsible for the adequate provision of work tools for employees and manages the fixed assets of our Bank.
Legal Vice-Presidency	**Fabián Mauricio Arias** Industrial and Systems and Computer Engineer from Universidad de los Andes Master's degree in Financial Economics from the University of Oxford. Bank Experience: 4 Months Responsible for the administration and management of operational, credit, market, liquidity, balance sheet, money laundering, security, SOX and Mass Collection risks.
Commercial Vice Presidency Personal Banking	**Iván Mauricio Cepeda Díaz-Granados** Civil Engineer, MBA He has been vice president for 6 years, previous experience at Grupo Aval: 10 years Leads the processes necessary for the granting of credit, through the analysis of general market information, customer financial data and regulatory regulations, and control entities, seeking low risk and maximum profitability in the commercial and consumer segments. Coordinates the evaluation processes, portfolio rating, estimation of the expected loss and determines the corresponding provisions
Vice-Presidency of Businesses	**Pedro Luis Villegas Ramírez** Electronic Engineer, Telecommunications Specialist, MBA He has been Vice President for 4 years, previously he was Technology Manager at the Bank. Responsible for the definition of operational and technological strategies, the development, maintenance and execution of technological solutions and the definition and application of operational procedures that guarantee the adequate processing of transactions carried out through the different service channels. Also designs and implements the service and operation model through the definition of processes aimed at fulfilling the customer value proposition, with their respective management indicators that allow measuring the customer experience and operation at the level of times, volumes and resources.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Senior Management compensation

The remuneration system of our Senior Management includes a base salary, complemented by an annual bonus that is assigned according to the results obtained by the Bank in the previous year. This bonus is approved directly by Grupo Aval.

On the other hand, Managers who support Senior Management receive a full salary. In the case of Treasury Management, in addition to this salary, an additional quarterly variable compensation is offered, which depends on the results achieved during that period.

Conflict of interest

| GRI 2-15 |

We have a Conflicts of Interest Committee (CCI), which is responsible for determining, in the process of managing situations that may generate a possible conflict of interest, whether the operation in question is of a regular nature, typical of the ordinary activities of the company or is in line with market conditions. Otherwise, the Committee will have to decide whether to approve or reject the operation.

If, as a result of the analysis of the situation presented, the CCI determines that the transaction poses a conflict of interest and considers that the decision exceeds its scope of competence, it must refer the matter to the Board of Directors of the corresponding entity.

The Board of Directors will evaluate the factors that make up the conflict of interest and will make an informed decision, in accordance with its legal and statutory powers. This decision may be: i) the approval of the transaction, ii) the recommendation to refrain from carrying it out, iii) the approval subject to certain modifications, or iv) the referral of the matter to the consideration of the general shareholders assembly. The Board will establish the criteria on what type of transactions can be decided by itself and which must be submitted to the assembly, including, among other aspects, materiality criteria.

The policy for identifying, communicating and managing conflicts of interest was approved by the Board of Directors in Minutes No. 1525 of June 28, 2019, and we constituted the Conflicts of Interest Committee, made up of the following main members: financial vice president, risk vice president, legal vice president, and alternate members: accounting manager, credit risk manager, personal banking legal manager.

During the period covered by this report, no conflict of interest situations arose that required to be raised to the Board of Directors; the other cases were properly handled by the Conflicts of Interest Committee.

We also strictly complied with the provisions established in its Conflict of Interest Policy, ensuring transparency in the management and handling of conflicts of interest before its stakeholders. The Board of Directors, through its Secretary, keeps a detailed record of the operations related to conflicts of interest that have been approved, and complies with the duty of disclosure established in Decree 2555 of 2010. This information is included in the accountability report that is presented annually to the General Shareholders Assembly, which details the nature of the situations, the decisions made and the corresponding actions. In this context, we provide relevant information on aspects such as membership of different boards of directors, cross-shareholding with suppliers and other stakeholders, the existence of controlling shareholders, and relationships, transactions and outstanding balances with related parties. In addition, in our capacity as issuer of securities, we inform the general public about material conflicts of interest that may arise, complying with current Colombian legislation on transparency.

During the period covered by this report, no conflict of interest situations arose that required to be raised to the Board of Directors



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Board of Directors information management

| GRI 2-16 |

We comply with the process of communicating critical concerns to the highest governing body, ensuring that directors receive the necessary information for the development of the Board of Directors sessions in a timely manner. With the support of the Board Secretary's task force, relevant documentation and reports are distributed in advance, usually a minimum of five days prior to the session. Critical concerns and information are communicated through digital tools such as the Teams platform and email, making it easy to access information and be able to efficiently address urgent or relevant topics before meetings.

Collective knowledge of the highest governing body

| GRI 2 — 17 |

During 2024, three (3) members of our Board of Directors obtained the ESG Director Training Certificate granted by the IFC, which allowed them to strengthen their capacities in environmental, social and corporate governance.

Board evaluation

| GRI 2-18 |

The evaluation of the Board of Directors is carried out from a collegiate perspective, individually and by each of the committees that make up the board, through questionnaires, this year being for the first time a self-evaluation process in a totally digital way with the use of the Microsoft Forms tool.

For the preparation of these questionnaires, aspects to be evaluated are taken into account, such as the structure and conformation, agenda and strategic focuses, fulfillment of responsibilities, dynamics and operability of the board.

In addition, the board evaluation contemplates a weighting of the board's decisions that direct the organization's actions that influence the economy and the lives of our customers through our products and services.

For the year 2024, the self-assessment of our Board reflected an effective governance body, which fulfills the main responsibilities of governance and is committed to contributing to the development of the Bank. The average rating of the development of the Bank's Board of Directors 2024 is 4.78/5.0. It is worth highlighting key elements that result in high ratings and denote in general a good corporate governance system: i. The climate of trust in the Board sessions, open communication that facilitates discussions, and a constructive approach to making better decisions. ii. The autonomy that the members of the Board of Directors have, attending to their duties as administrators (acting in good faith, with loyalty and with the diligence of a good businessman), and iii. The good level of trust that the Board of Directors has in the Administration, which facilitates decision-making.

At the committee level, the Audit and Risk committees have positive ratings, as for the Appointments, Remuneration and Corporate Governance Committee, opportunities for improvement were identified with which an improvement plan is being developed to be implemented in the coming year.

We also highlight that we comply with the best practices of Corporate Governance through a process of evaluation of the members of the Board of Directors that is both rigorous and transparent. Following the policy approved by the Board itself, we implemented an alternating system of evaluations, combining self-evaluations and external and independent evaluations. This approach ensures objectivity and continuous improvement. For example, an external and independent evaluation was carried out in 2023, while a self-evaluation will be carried out in 2024.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Board of Directors remuneration policy

| GRI 2-19 |

As part of the efforts of Grupo Aval Acciones y Valores S.A., and Banco de Occidente, to adopt the best corporate practices, we have defined the Appointment and Remuneration Policy of the Board of Directors. This policy was designed by Grupo Aval Acciones y Valores S.A. and Banco de Occidente adopted it according to our needs. The policy was approved at the General Shareholders Assembly held on March 26, 2020.

The three chapters that make up this Policy are:

- Criteria Applicable to the Composition of the Bank's Board of Directors: among which professional training, skills, knowledge and/or careers related to the financial sector, recognition, reputation, leadership, among others, stand out.
- Procedure for the Presentation and Evaluation of Proposals and Candidates.
- Remuneration of the Board of Directors.

Board compensation

| GRI 2-20 |

According to a market analysis carried out by the Appointments and Remuneration and Corporate Governance Committee, a 174.35% increase in fees for members of the Board of Directors was recommended to the General Shareholders Assembly.

In accordance with the above, at the meeting held on March 20, 2024, the recommendation made by the Appointments and Remuneration and Corporate Governance Committee was approved for a value of six million pesos m/cte ($6,000,000) per meeting of the Board of Directors and one million five hundred thousand pesos m/cte ($1,500,000) for attendance at the Committees dependent on it for the statutory period March 2024-2025.

As of December 31, 2024, the members of the Board of Directors received as fees for their attendance at the meetings of the Board of Directors and the Committees to which they are part, the amount corresponding to seven hundred and twenty-two million one hundred fifteen thousand seven hundred eleven pesos m/cte ($722,115,711).

We clarify that the Board of Directors of the Bank validly deliberates with the presence and votes of the majority of its members. Throughout 2024, up to the date of submission of this report, the Board held twenty-four (24) meetings with a valid quorum to deliberate and decide.

For more information, please consult the full text of the Board of Directors' Appointment and Remuneration Policy that is disclosed on the Bank's website.

Board Appointment and Remuneration Policy



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Senior Management evaluation

The members of Senior Management are evaluated through the Balance Scorecard (BSC) which is measured monthly and whose results reports are socialized every 3 months (approximately). The Balance Scorecard is measured internally by the Financial Planning and Budget Management, under the control of figures (updated in accordance with the Bank's goals) and indicators specific to each area (which were adopted several years ago as a result of an external consultancy). These metrics are lowered at the level of leaders of the organization under a cascading scheme, seeking alignment within management and forming part of their annual performance assessment.

Internal Control System (ICS)

The Internal Control System (ICS) of the Bank and its Affiliates is a continuous and dynamic process that seeks to improve efficiency in its various elements, including the control environment, risk management and monitoring, with the active participation of all our employees, from the operational levels to the Board of Directors. The Internal Audit, independent and objective, supervises compliance with the governance and control processes under the current regulatory framework, executing risk-based audits and presenting the results and recommendations to the Audit Committee of the Board of Directors on a quarterly basis. In addition, it fosters a culture of risk management through an annual training plan.

Evaluation of the performance of the Internal Control System (ICS)

In compliance with the provisions of the basic legal circular of the Finance Superintendence of Colombia, our Internal Control System (ICS) and its subsidiaries were properly managed during 2024, achieving reasonable risk mitigation. This evaluation was based on the comprehensive analysis of the components of the ICS, including the Control Environment, Risk Management, Control Activities, Information and Communication, Monitoring, and Independent Evaluations.

Country Code Survey

This survey is essential for the continuous improvement of our corporate governance practices, it allows us to evaluate and align our processes with the highest standards of transparency, ethics and accountability. This assessment helps us identify areas for improvement, strengthen internal controls, and optimize our management, resulting in greater investor confidence, a stronger reputation, and a better ability to manage risk.

In 2024, we presented our report on the application of the Bank's best corporate governance practices, based on this survey, which evaluates five major areas of corporate governance and contains thirty-three key measures, with a total of up to one hundred and forty-eight recommendations. The transmission of the Country Code survey, corresponding to the year 2024, was carried out in January 2025, in which 130 measures were adopted, 2 measures do not apply to Banco de Occidente and the others are under analysis, to verify which of them are viable for implementation.

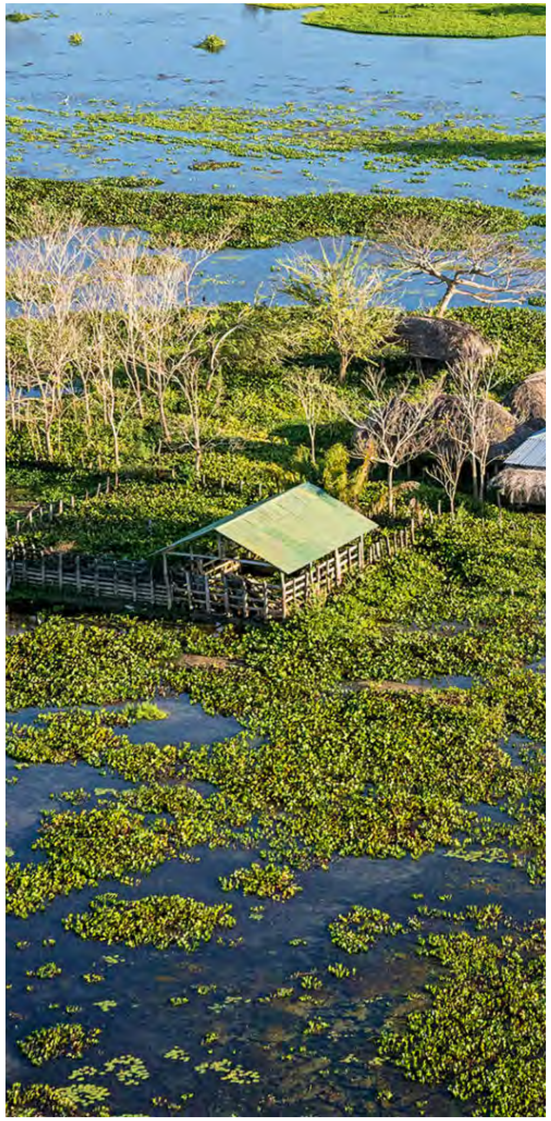
The publication of the answers can be found on our website, Information Section for Shareholders and Investors.

Information for shareholders and investors

Investor relations

We guarantee our shareholders the right to request timely information, provided that the established confidentiality requirements are met, and ensuring that everyone is treated equally, regardless of their shareholding. This process is supported by an interdisciplinary team that includes legal and tax advice, in accordance with current regulations, and is governed by the internal manual MAN-CAP-066. Our shareholders can access the information through various channels, such as email, telephone service and the Bank's website.

The foregoing is in accordance with the provisions of the policies for shareholders found in Article 7 of the Bank's bylaws, which establish that:



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Each share shall entitle one (1) vote in all decisions of the General Shareholders Assembly with the restriction set forth in Article 22 of these Bylaws. The Company will also treat its shareholders in the exercise of the right to petition, complaints and information, regardless of the value of their shares. Among the specific mechanisms that ensure equitable treatment of shareholders are: (i) requesting the call to the Shareholders Assembly in accordance with the provisions of these bylaws and the Code of Good Governance, (ii) demanding compliance with the Code of Good Governance, (iii) being answered and informed in the same detail and at the same time and opportunity in order to protect their rights. The attention and provision of information to the Company's shareholders will be made through the unit that the Company assigns for their attention. (iv) the others provided for in these bylaws, in the Code of Good Governance and in the Law.

Shareholding and information at the Assembly

Regulatory and Legal Compliance

SDG 16.5; 16.6; 17.5

In 2024 we reaffirmed our ongoing commitment to legal compliance. Compliance with current rules and regulations not only represents a legal requirement, but also a commitment to ethics and the trust of our clients, investors and the financial system in general. From an economic perspective, this compliance management allows us to ensure financial soundness by mitigating risks and avoiding penalties that could negatively impact the profitability of managed resources.

As a Bank, our legal management is aligned with compliance with environmental, social and governance (ESG) regulations, ensuring responsible and sustainable practices in all our operations. In this context, the Legal Vice Presidency plays a fundamental role in leading the design, implementation and supervision of the regulatory policies that govern our entity, ensuring compliance with regulations on business ethics, human rights and transparency. Through the constant monitoring of national and international regulations, the updating of internal procedures and the training of our employees in compliance principles, the Legal Vice Presidency strengthens corporate governance and mitigates risks associated with regulatory non-compliance,



regulatory sanctions, fraud, corruption and violations of labor and human rights.

Our legal and regulatory management is articulated with anti-corruption, regulatory compliance and labor rights policies, promoting a culture of integrity and reinforcing our commitment to an ethical and sustainable operation. This work allows us not only to comply with applicable regulations, but also to anticipate new regulatory challenges, ensuring transparency and the trust of our stakeholders.

We also continued to strengthen our fraud prevention strategies, investing in advanced monitoring and cybersecurity technologies, constantly training our teams, and strengthening our incident response protocols. These actions allow us to reduce vulnerabilities and strengthen our clients' confidence in the protection of their financial assets.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Legal and regulatory management structure

Our Legal Vice-Presidency is in charge of leading regulatory management and is made up of three managements:

- **Legal Process and Corporate Governance Management:** which is responsible for managing legal risk within the framework of operational risk, as well as overseeing internal regulatory development and corporate governance structure. .
- **Judicial Processes Management:** is responsible for managing litigation against the bank and has advisors specialized in labor and tax matters.
- **Asset Standardization Management:** is the one who manages the recovery of specialized portfolio and non-performing loans, standing out for its contribution to the generation of the bank's profits by meeting demanding budget goals through its efficient collection management.

In addition, conciliation is an alternative dispute resolution mechanism that allows the parties to reach an agreement without the need to go to court. Through this procedure, an agile, effective and mutually beneficial solution is sought, with the intervention of a neutral third party that facilitates dialogue and negotiation. In our case, this mechanism is key to resolving disputes in a timely manner, avoiding lengthy litigation and ensuring a fair response for clients.

Litigation, judicial and administrative proceedings

Judicial proceedings against the Bank that represent a material impact are adjusted annually, following established accounting and financial standards. This adjustment is made based on the bank's profits and the application of accounting principles that determine the provision necessary to cover possible contingencies. In this way, at the Bank we recognize and responsibly manage the risks associated with these litigations, ensuring that their financial impact is duly reflected in the financial statements.

Therefore, the legal proceedings against the Bank that represent a material impact (with claims equal to or greater than $4.061MM) are detailed in notes 23 and 24 of the Separate and Consolidated Financial Statements, respectively.

We believe that the probability of losses arising from these litigations is low, so we do not consider it necessary to make provisions. In addition, we have legal risk management mechanisms that allow us to monitor and prevent situations that may lead to litigation. At the time of being notified of a process, a report is made to the Operational Risk area so that they can manage these risks and are able to mitigate them. None of our affiliates presents significant judicial processes that require disclosure in this report.

At the Bank we **recognize and responsibly manage the risks** associated with these litigations, ensuring that their financial impact is duly reflected in the financial statements.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE COLOMBIA

Main regulatory provisions in force in 2024

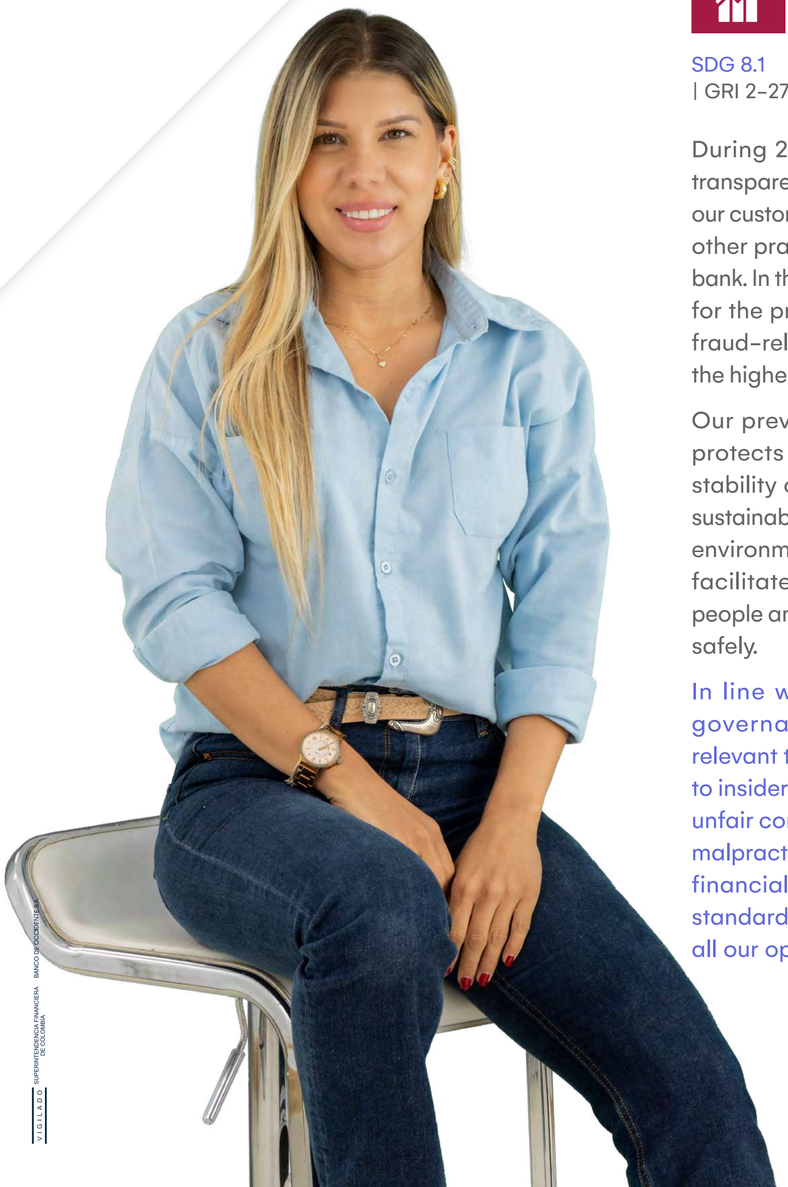
Among the most relevant regulations that have impacted our operations during the 2024 period are:

- **Decree 1358 of 2024:** amends Decree 2555 of 2010 with regard to the criteria for identifying those linked to credit institutions, the mechanisms for managing their transactions and the transition regime of Decree 1533 of 2022. This update strengthens our processes for identifying and controlling customers and counterparties, minimizing fraud risks and promoting transparency in our operations.
- **Decree 1239 of 2024:** establishes a regulatory framework to strengthen the liquidity of the stock market, optimizing price formation, facilitating the entry of new issuers and diversifying the investor base. This contributes to our sustainable finance strategy by offering new opportunities for the issuance of green and social bonds, aligned with our ESG commitments.
- **External Circular 003 of 2024 — Finance Superintendence of Colombia:** imposes guidelines on limits on large exposures and concentration of risks in credit institutions, in compliance with Decree 1533 of 2022. Its implementation reinforces our financial soundness and risk management, guaranteeing balance in the distribution of the credit portfolio and mitigating systemic impacts.
- **External Circular 004 of 2024 — Finance Superintendence of Colombia:** regulates aspects related to the open finance system, facilitating access to financial data with the consent of customers. This drives financial inclusion by fostering competition, improving product offerings, and enabling more equitable access to credit, aligning with our commitment to sustainable economic development.
- **External Circular 014 of 2024 — Finance Superintendence of Colombia:** define guidelines on the accumulation and release of provisions in the commercial and consumer credit portfolio. Its application strengthens our ability to mitigate credit risks in line with international best practices, ensuring stability and resilience in our operations.
- **Law 2381 of 2024:** reforms the pension system in Colombia, restructuring pension management entities and modifying the contribution scheme for savers. This reform impacts our financial advisory strategy by offering new savings and investment options for our clients, reinforcing our social responsibility in long-term financial planning.
- **Law 2439 of 2024:** regulates the rights and duties of consumers, with emphasis on the granting of credit products through electronic means. Its implementation optimizes our digital credit granting processes, promoting greater transparency and consumer protection in an increasingly digitized financial environment.
- **Law 2365 of 2024:** establishes for the prevention, protection and attention of cases of sexual harassment in the workplace and in measures of higher education institutions in Colombia. This regulation reinforces our internal ethics and governance policies, strengthening prevention programs, reporting protocols and protection mechanisms to guarantee a safe work environment free of discrimination.



This set of regulations defines the regulatory framework in which we operate, ensuring transparency, stability and compliance in all our activities. Likewise, its application allows us to strengthen our commitment to ESG principles, ensuring that our financial, social and governance strategies are aligned with the highest standards of sustainability and corporate responsibility.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

SDG 8.1
| GRI 2-27; GRI 206-1 |

During 2024, we reaffirmed our commitment to transparency, financial security and the protection of our customers against risks associated with fraud and other practices that could affect confidence in our bank. In this regard, we implemented robust strategies for the prevention, detection and management of fraud-related incidents, always in compliance with the highest regulatory standards and best practices.

Our preventive and reactive approach not only protects our customers, but also strengthens the stability of the financial system, a key pillar of our sustainability strategy. By ensuring a safe and reliable environment, we promoted market confidence and facilitate financial inclusion, ensuring that more people and businesses can access financial services safely.

In line with our approach to solid corporate governance and regulatory compliance, it is relevant to note that we did not have cases related to insider trading, violations of antitrust regulations, unfair competition practices, market manipulation, malpractice or other regulatory breaches within the financial industry, which reflects the high ethical standard and commitment to legality that governs all our operations.

We maintain strict internal controls and compliance policies that mitigate risks associated with misconduct. Our management is based on principles of integrity, transparency and responsibility, ensuring that our employees, clients and strategic allies operate within a reliable financial ecosystem aligned with current regulations.

Our commitment is to continue evolving in the implementation of good corporate practices, ensuring that our business model continues to be a benchmark in the financial sector, not only in terms of economic strength, but also in terms of ethics, compliance and corporate responsibility.

In 2024, we have maintained a firm commitment to transparency, ethics and regulatory compliance. We had no cases where fines have been imposed and no cases related to insider trading, antitrust practices, unfair competition, market manipulation, malpractice or other violations of relevant laws and regulations were recorded. This conduct reflects our strong corporate governance and alignment with sustainability principles.

We ensured regulatory compliance and transparency in the management of judicial processes. In accordance with the criteria established by our Accounting area, we consider material those judicial processes that meet the parameters of financial relevance. This relevance is based on our earnings and on the application of accounting principles that determine the provision necessary to cover possible contingencies and that, due to their potential impact, must be disclosed in the notes to the financial statements.

In this context, we rigorously monitor cases to assess their impact and properly manage legal risks. As part of this management, the only relevant news in the reported period is a case of class action promoted by two people against several banks and other entities, in which the improper capitalization of interest and the incorrect valuation of assets were alleged, we were able to demonstrate that our actions were aligned with the payment agreements and the restructuring of obligations with all creditors, including those of the Department of Valle. This result reflects the strength of our legal position and compliance with the legal regulations in force at the time, which reaffirms our commitment to transparency and respect for established legal and financial processes.

The favorable resolution underscores our ability to properly manage and resolve disputes, which reinforces confidence in the legal strength of the Bank's and the other defendants' legal standing.

En 2024, hemos mantenido **un compromiso firme con la transparencia, la ética y el cumplimiento** normativo.

This approach allows us to provide clear and accurate information to our stakeholders, ensuring proper legal risk management and strengthening trust in our organization.

Corruption can have a detrimental impact on the social fabric and slow down economic growth. Likewise, this type of practice can cause a loss of confidence on the part of our stakeholders, affect the assets of our investors, customers and suppliers, and generate social repercussions.

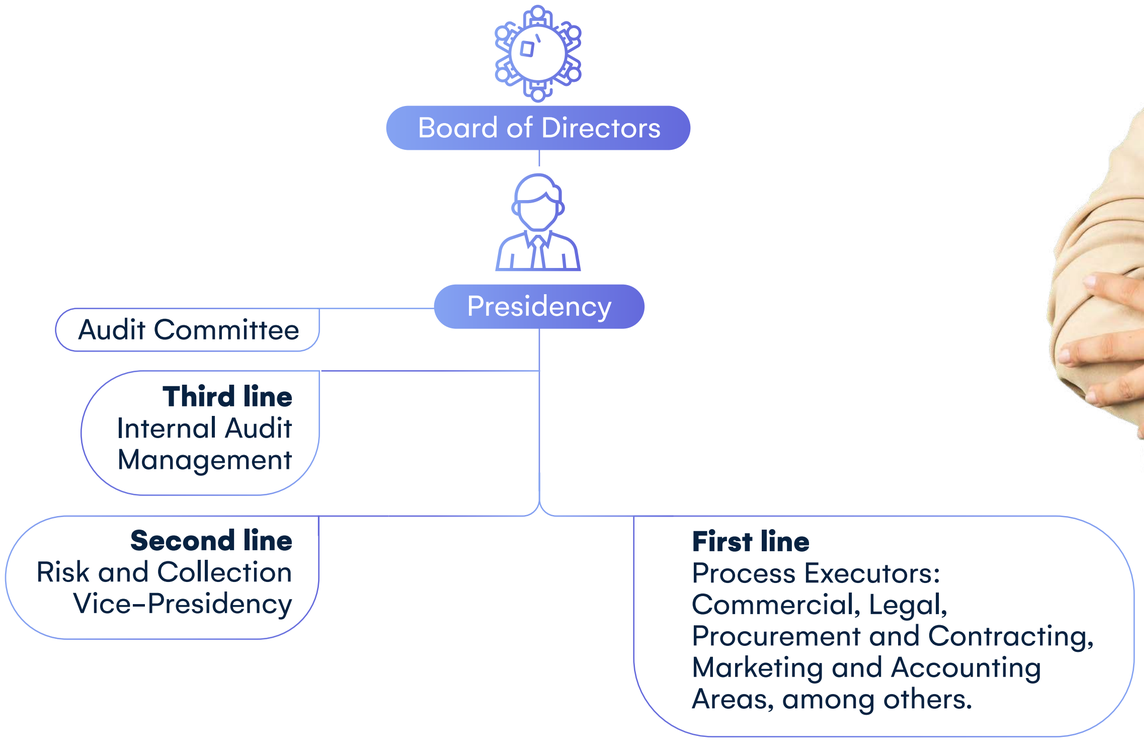
In this context, at the Bank and our subsidiaries, we understand the importance of being guided by sound ethical principles. This commitment not only preserves the integrity of our institution, but also contributes to the construction of a more equitable society and a transparent economic system, promoting responsible business practices that reinforce our ethical principles. This approach is supported by our Internal and External Fraud Management Process Policy and is part of our ABAC program.

Anti-Corruption Corporate Policy

Our Fraud Management Process Policy and regulatory compliance initiatives not only mitigate legal and financial risks, but also strengthen trust in the market and the relationship with our stakeholders. To this end, we implement rigorous internal controls, carry out periodic training on corporate values and business ethics for our employees, and carry out awareness talks aimed at our suppliers, thus promoting a culture of integrity throughout our value chain. In addition, we have confidential reporting channels that guarantee the detection and effective management of any irregularity.

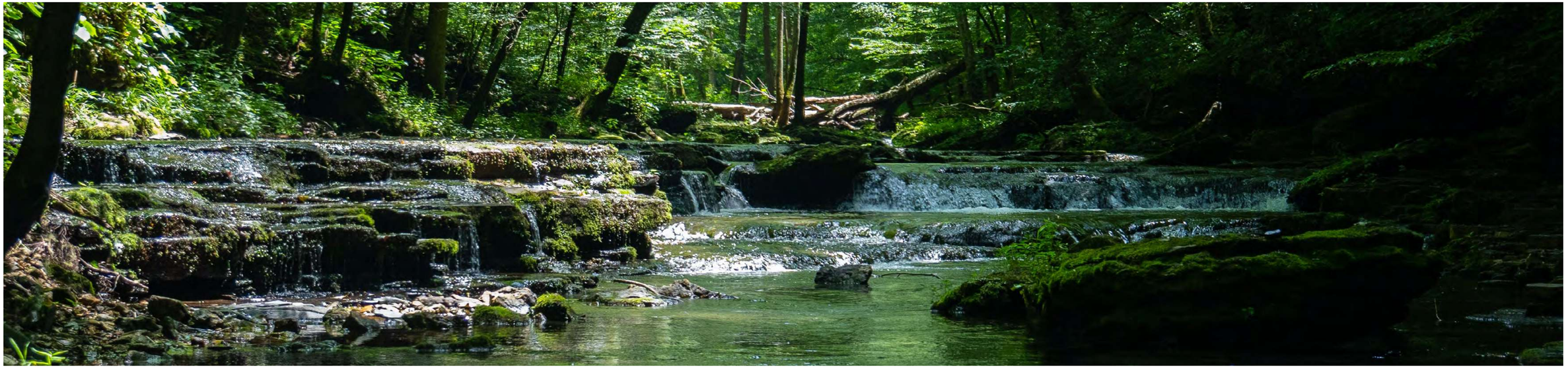
In this way, we ensure a transparent business environment, aligned with our ESG strategies and constantly evolving to meet the challenges of a regulatory environment.

The guidelines for management in this area are defined by the Senior Corporate Vice Presidency of Risk and Compliance of Grupo Aval, in our entity, those in charge of the implementation, supervision and compliance of anti-corruption management are:





VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Our Board of Directors assumes responsibility for identifying and understanding corruption-related risks, approving the Internal and External Fraud Policy, and overseeing its implementation. On a regular basis, it receives information on the assessment of these risks in a clear, complete and timely manner, with defined criteria to promote continuous improvement.

Under the risk management model, a 3-line scheme has been defined, and it is important that employees know their functions to know which line they belong to.

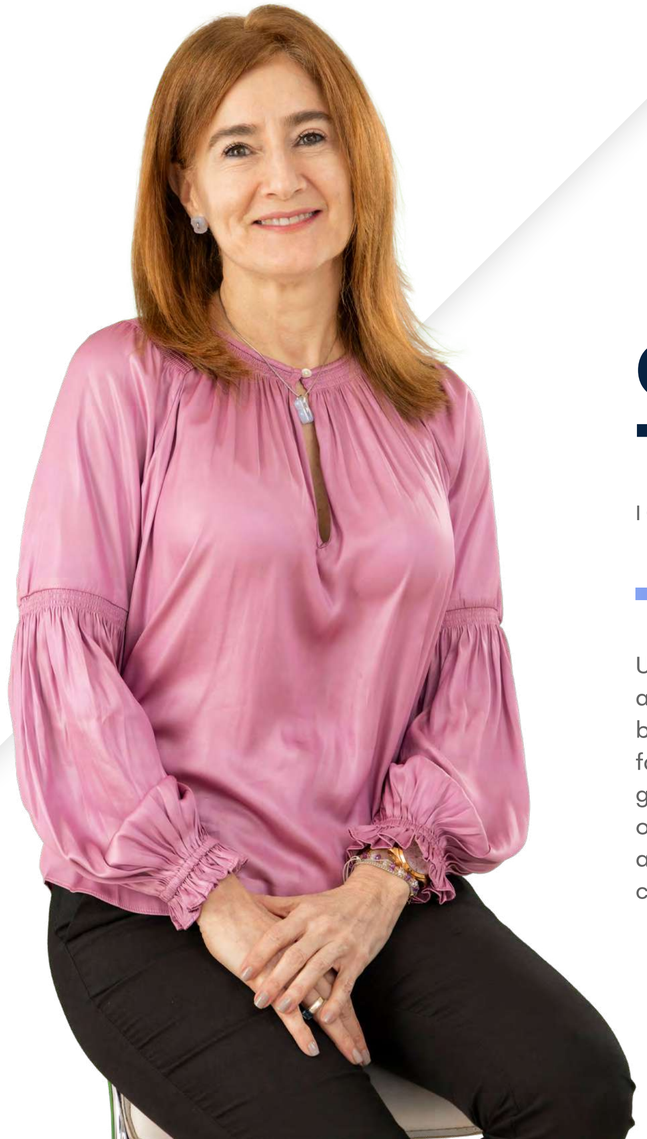
The first line of defense is responsible for identifying, evaluating and managing the risks associated with products, activities, processes and systems under its direction. It is mainly made up of the business areas, those that interact directly with the stakeholders that affect operations and those related to the accounting record (commercial, administrative, purchasing and financial).

In our structure, the second line of defense, made up of the Risk and Compliance areas, constantly supervises compliance with obligations against the risk of corruption. These areas collaborate closely with the first line, supporting it in the identification of risks and qualification of controls to measure the effectiveness of the actions implemented, identify possible gaps and determine the level of residual risk, facilitating the implementation of corrective and preventive action plans. In addition, these tasks are led by the Vice Presidency of Risk and Collection and, in the specific case of corruption, by the Bank Security Management, which coordinates investigations for violation of policies and supervises corrective and disciplinary actions. In this way, we guarantee robust management aligned with international best practices in terms of transparency and regulatory compliance.

The third line of defense, on the other hand, conducts independent evaluations on corruption risk management, as well as on related processes and systems, reporting to the Audit Committee with periodic reports. In addition, independent audits play a fundamental role in strengthening the confidence of our investors and other stakeholders. These external reviews allow us to evaluate the effectiveness of our controls, ensuring transparency and alignment with international standards. The results and recommendations derived from these audits allow us to continuously strengthen our governance practices, improve risk management, and reinforce our commitment to ethics and sustainability.

To ensure the effectiveness of these controls, we promote an ethical culture in which all our employees participate in training, along with some suppliers who act as intermediaries with public entities and employees, to strengthen their commitment to the principles of transparency. This year, compliance with the annual ABAC virtual course was 98%; in addition, the ABAC culture survey was carried out for relevant positions, with a completion of 71%.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Compliance and Transparency

I GRI 205-1; GRI 205-2; GRI 205-3 I

Under the framework of the Corporate Anti-Corruption and Bribery Policy (ABAC), all special operations and Third-Party Intermediaries (TPI) with which we maintain business relations were exhaustively evaluated by the risk area, obtaining a favorable concept in each of the cases. These evaluation processes not only guarantee compliance with our internal policy, but also ensure transparency in our management and accountability to our stakeholders. The results of these assessments are reported in accordance with these standards, strengthening confidence in our due diligence and risk mitigation practices.

Regarding the significant risks identified through the risk assessment, the ABAC policy clearly defines the operations that, due to their characteristics, could involve a greater exposure to the materialization of a corruption risk.

Among these operations are donations, sponsorships, contributions to social programs under the sustainability model, acceptance and/or delivery of gifts and invitations, public or political contributions, and mergers or acquisitions. In order to ensure transparency and compliance with the established policies, the risk area carried out the implementation of due diligence on 100% of the operations carried out by the entity, reaching a total of 412. This figure represents a reduction compared to the previous year, when 481 operations were evaluated. Finally, it was possible to guarantee that none of the operations represented a risk of corruption for the Bank. In addition, all suppliers that, due to the type of service provided, were classified as TPI, to identify the level of risk and determine the due diligence necessary to mitigate said risk. The number of operations evaluated was:

Year	No. Operations where corruption risk assessments were carried out	% Operations where corruption risk assessments were carried out
2022	247	100%
2023	481	100%
2024	412	100%

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Below are the main corruption risks that were identified under the risk management model, the regulatory parameters and the measures implemented:

Operation Evaluated	Description of Identified Risk	Measures implemented
ABAC Special Operations (donations, sponsorships, contributions to social programs under the sustainability model, acceptance and delivery of gifts or invitations, mergers or acquisitions)	Offer, give, promise and receive economic benefits, gifts, granting, offering and promise of payment of anything of value to carry out, expedite, delay or favor commercial and contracting processes with third parties. Offering, promising and delivering directly or indirectly money, things of value or in kind that have a social orientation, donation, sponsorship and public or political campaigns with the purpose of obtaining an undue benefit.	All the areas responsible for the process have been trained on the risks posed by this type of operation and the due diligence that must be carried out on each of them, likewise, the risk area carries out permanent monitoring to ensure compliance with the established policies and procedures.
Relationship with Third Party Intermediaries	Establishing a relationship with third-party intermediaries - TPI outside the policies established by the entity through corrupt acts.	As part of the process of linking and updating suppliers, due diligence prior to contracting the supplier has been established, to identify the level of exposure to corruption risks that may entail the hiring of the third party, as well as the monitoring that must be carried out while the commercial relationship exists between the parties. As part of the contracting process, the third party agrees to comply with anti-corruption regulations and commits to our zero-tolerance policy for bribery and corruption.

In addition to the preventive and corrective actions mentioned above, we have implemented a series of key measures in relation to the ABAC communications and training plan. First, various activities were carried out focused on reinforcing the principle of zero tolerance for bribery and corruption for all employees. These activities included the updating of the virtual training material, which now includes specific content with cases aimed at the positions and areas with the greatest exposure to ABAC risks. In addition, on a semi-annual basis, the ABAC Officer submits a detailed management report on the program to the Board of Directors, ensuring continuity and follow-up of compliance with the policy.

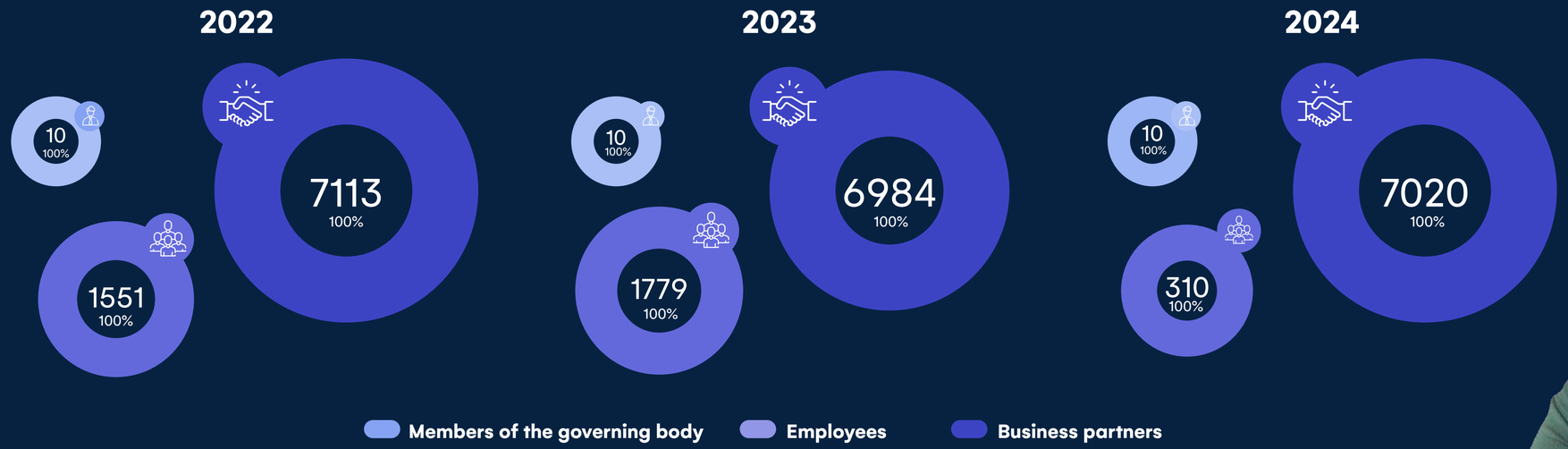
In addition, as part of the control measures to mitigate corruption risks, every time we engage or renew a supplier categorized as a Third-Party Intermediary (TPI), we explicitly request that they commit to the bank's ABAC policy. This anti-corruption clause was included in the contracts of suppliers, who also received detailed information on the main guidelines of this policy. All this is part of the comprehensive approach to ensure that all operations carried out, both internally and with third parties, are aligned with the principles of integrity and transparency.

Below is a table of the operations evaluated, reflecting the actions carried out within the framework of the ABAC strategies, which strengthen risk management and regulatory compliance.

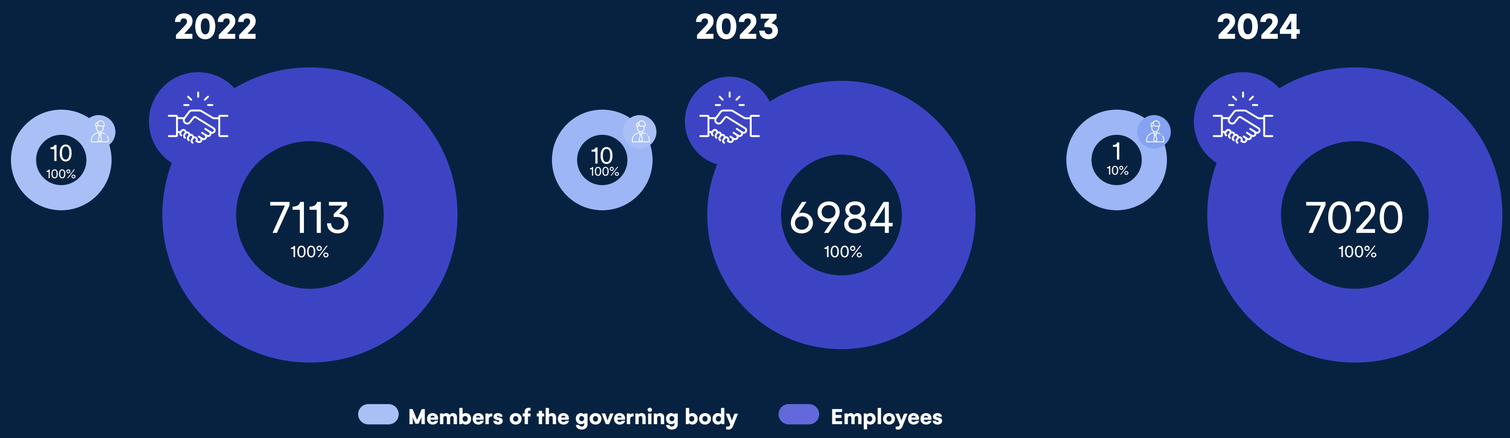


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Stakeholders to whom anti-corruption policies and procedures were communicated:



Stakeholders who received training on anti-corruption procedures:





VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Commitment to Remediation of Negative Impacts

I GRI 2-25 I

We are committed to remediating the negative impacts that the organization has caused or contributed to. To this end, we have defined ten principles that allow us to identify and effectively address any negative impact derived from our operations, ensuring timely responses and structural solutions in the management of Requests, Complaints, Claims and Suggestions (PQRS), focused on the continuous improvement of our customers' experience:

1. The customer is at the center of our daily management.
2. We thoroughly understand each claim to address the customer's need.
3. We guarantee quality responses within the established times.
4. We prioritize operational excellence in every interaction.
5. We provide support through the "Padrino Plan" to optimize care.
6. We generate memorable experiences for our most valuable customers.
7. We implement early warnings to mitigate mass events.
8. We promote a positive work environment based on cohesion and teamwork.
9. We lead the PQRS governance model to ensure organizational compliance.
10. We mobilize structural solutions through root cause analysis.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

We manage claims with a preventive approach, ensuring timely attention and analyzing the root cause of each case to avoid recurrences.

Timely Attention:

During 2024 **we improved our response capacity,** achieving a **97%** attention rate, which represents an increase of 7 percentage points compared to 2023.

Preventive Action:

Thanks to collaborative work between areas, **we have reduced PQRS by 6.3% compared to the previous year,** reinforcing our preventive approach. To facilitate the management of complaints and claims, we have several own and third-party channels.

Own Channels:

Service Line, Office Network, Commercial Team, Housing and Vehicle Centers, Claims Management Unit and other resolution areas.

Third-Party Channels:

SmartSupervision (Finance Superintendence), Tutela Action, Financial Consumer Ombudsman's Office, Government Entities (Fusiondata) and TransUnion.

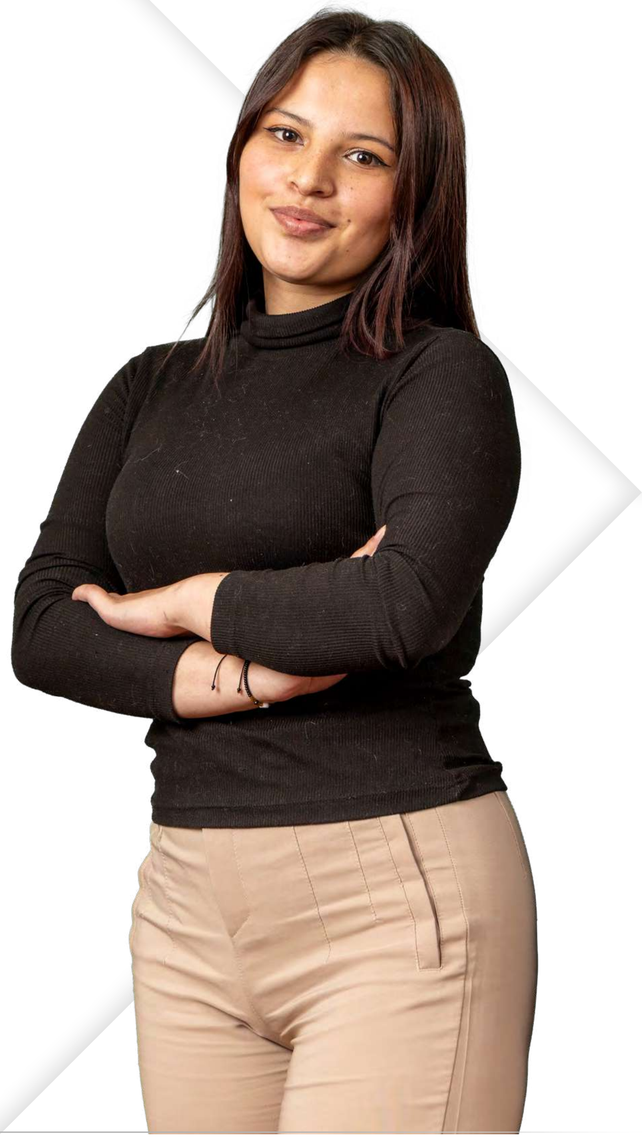
One of our main remediation mechanisms is the Financial Consumer Ombudsman's Office, which not only manages complaints, but also issues strategic recommendations to strengthen customer service and prevent future inconveniences.

Additionally, the customer experience area monitors indicators such as the Net Promoter Score (NPS) and the PQRS Satisfaction Index (INS) to evaluate the impact of our actions and optimize the user experience.

Thanks to these efforts, in 2024 we achieved:

- **Advanced 10 positions in the ranking of complaints** per 100,000 transactions compared to the second half of 2023.
- **Improved 4 positions in the ranking of complaints** per 1,000 products in the same period.

When we mention the "ranking" in the previous paragraph, we are referring to an analysis that includes two exercises carried out by the Finance Superintendence: the weighting of complaints per 1,000 financial products and the total number of complaints per entity. In addition, we carry out our own exercise that consists of the weighting of complaints per 100,000 transactions, which allows a more accurate view of the impact of complaints in relation to the volume of operations carried out.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Stakeholder involvement in improving grievance mechanisms

We actively integrate feedback from our stakeholders into the design, review and improvement of our grievance mechanisms, ensuring more effective processes aligned with their expectations.

- PQRS Satisfaction Surveys: In 2024, we collected 2,106 surveys that reflect the customer's perception of our grievance mechanisms.
- Recommendations of the Financial Consumer Ombudsman as spokespersons for customers, the Finance Superintendence as supervisor through the delegation of the financial consumer and Asobancaria as an association.
- We developed specific action plans to improve our indicators and ensure continuous monitoring of opportunities for improvement.

To ensure the effectiveness of our grievance and remediation mechanisms, in 2024 we have implemented several key initiatives:

Quality in Responses Model:

External evaluation to ensure that our responses are clear, accurate and aligned with the needs of the clients.

PQRS Governance Model:

Accountability system that optimizes response times and guarantees efficient management of requests.

PQRS Padrino Plan:

Specialized support to improve the filing and resolution of claims, ensuring an agile and effective process.

Re-infatuation Program:

Transformation of negative experiences into loyalty opportunities, strengthening the relationship with our customers.

Thanks to these efforts, **in 2024 we achieved an increase of 16 points in the PQRS Satisfaction Index (INS).** In 2023 we had a score of 57% and in 2024 we had a score of 41%, **reaffirming our commitment to continuous improvement and excellence in customer service.**



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Culture of Integrity

I GRI 2-26; SASB FN-CB-510a.2. I

Within the framework of comprehensive and transparent management, we have the Code of Ethics and Conduct and the Internal Work Regulations, these guidelines, all our employees sign a commitment of conduct and compliance at the time of their entry and when these documents are updated.

In the event of any situation that may represent a breach of the established rules, employees have the obligation to report it to their immediate supervisor or, as appropriate, to the Vice Presidency of Human Talent, the Internal Audit Management, the Compliance Management or the Bank Security Management. This mechanism strengthens the culture of control and risk mitigation, ensuring the confidence of customers, shareholders and other stakeholders.

We believe in equality as a right and equity as the guiding principle of our organizational identity. In our labor relations, we guarantee an environment free of discrimination and, throughout the period, we have not recorded cases of this type.

Ethics Hotline

The Bank's Ethics Hotline is a confidential and anonymous channel available for our employees, customers, users, suppliers, contractors or any individual to report situations related to fraud, corruption, bribery, money laundering or other irregular activities that compromise the entity's ethical standards.

Its main objective is to prevent, detect and mitigate risks arising from improper practices, such as conflicts of interest, guaranteeing the confidentiality of the information provided and protecting the identity of those who make the complaint.

Types of reports that can be handled through the Ethics Hotline include:

- The improper use or misappropriation of the entity's assets.
- Acts contrary to the values and principles established in the Codes of Ethics, Conduct and Good Governance
- Violation of internal rules or policies.
- Improper disclosure of confidential information. The Ethics Hotline is designed to promote compliance with ethical standards and prevent fraud or malpractice. All complaints received are investigated and, once the analysis is completed, they are submitted to the Audit Committee. In addition, twice a year, a report is prepared with the number of complaints received and their treatment.

The administration of the channel is led by the Internal Audit Management, which guarantees the confidentiality of the reports and manages the channel of the Ethics Hotline. This channel is available both on our web portal and on the Grupo Aval portal, facilitating access to the community in general. Its existence and operation are disclosed every six months by email to customers, suppliers and employees, in addition to being published on the web portal.

Once a complaint is received, the Internal Audit Management performs an initial analysis and directs the reports to the corresponding areas, establishing a reasonable period for the follow-up and communication of the results. In complex cases, external specialists, such as forensic auditing, can be called upon to conduct a more in-depth analysis. If irregularities are identified, the areas involved, such as the Labor Relations Management, manage the cases and apply the corresponding sanctions in accordance with the bank's policies.

It is the responsibility of the Internal Audit not only to investigate the reported cases, but also to follow up on the reported situations and analyze their causes to strengthen the ethical culture and continuously improve internal processes.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Number of concerns and type of requests for advice received:

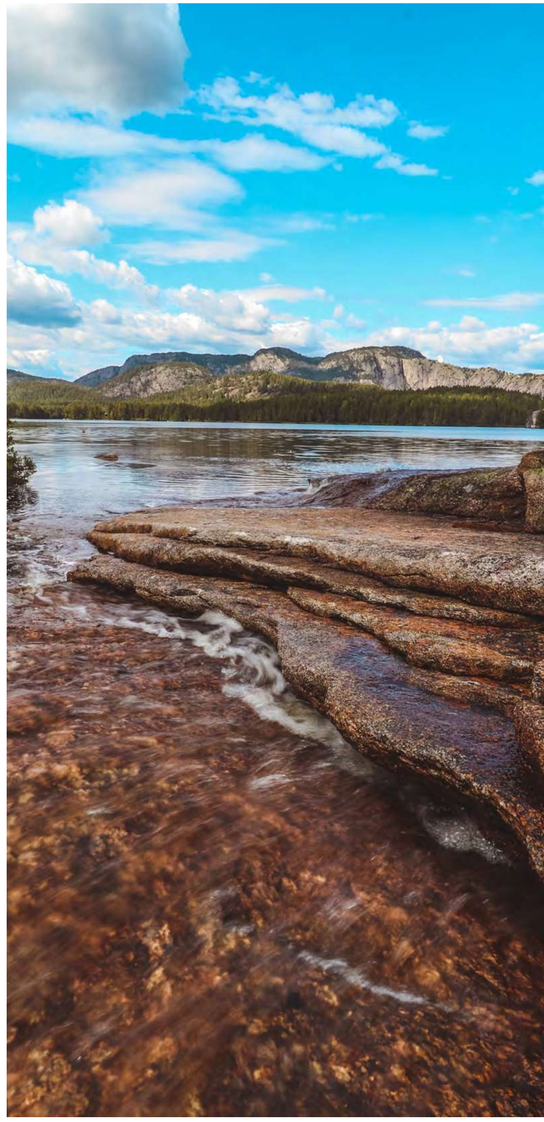
Class	2022	2023	2024
Complaints received through the channel of the ethics hotline of Banco de Occidente and affiliates.	139	173	183
Complaints received through the channel of the ethics hotline of the Corporate Comptroller of Grupo Aval.	20	18	12
Total	**159**	**191**	**195**

Type of requests	2022	2023	2024
Potential conflicts of interest	–	1	2
Aspects related to the work environment	34	54	42
Bad business practices (adulteration of documents, engaging new customers outside the authorized bases, failure to comply with procedures, failure in the application)	33	26	12
Customer complaints and requests	48	61	72
Information provided in the complaint is not sufficient/Channel Evidence	44	49	67
Total	**159**	**191**	**195**

In 2024 we set ourselves the goal of continuing to advance in the implementation of data analysis models to improve decision-making and risk coverage, therefore, we achieved the implementation of these models, which allowed us to carry out tests with greater scope, mainly focused on identifying the risks that affect the audited processes. We will continue to optimize these models and expand the coverage of audit tests, seeking to reduce uncertainty in results and strengthen risk management. This effort is part of a three-year plan that will culminate in 2026, with the automation of tests based on data analysis models, aligned with the identified risk levels.

In parallel, we have worked on strengthening the audit team, seeking comprehensive training that allows team members to address strategic, technological, accounting, financial and regulatory issues in a cross-cutting manner. During the reporting period, 11 team members were trained in key areas such as risk, new technologies (Python and Power BI), and international financial reporting standards. By 2025, the goal is to continue training more team members in areas such as cybersecurity, new technologies, and risks, with the goal of completing the comprehensive training of the entire team by the end of 2025.

We also focus audits on critical areas such as cybersecurity, information security and ABAC review programs, developing specific audits in these areas, as well as audits on personal data protection. For the coming years, the development of audits aimed at the most relevant risks, both those identified by management and by internal audit, will continue, as stipulated in the three-year audit plan.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Membership in Associations

SDG 17.5
| GRI 2-28; GRI 415 |

We actively participate in several national and international associations and organizations, playing a significant role in each of them. Below is a table with the main affiliations:

Entity	Approach	Geographical Location
Asobancaria	Belong to the most representative guild of the Colombian financial sector	Cundinamarca, Bogotá.
ANIF	Contribute to the maintenance and operation of the National Association of Financial Institutions	Cundinamarca, Bogotá.
ProBarranquilla	Through this affiliation, it seeks to support the development and regional growth of companies and tributaries in alliance with the mayor's office and the governor's office of Atlántico for the development of projects and the generation of employment. In addition, with this alliance, we built a space for participation and positioning in the region.	Atlántico, Barranquilla.
Valle del Cauca Action Unit	To promote the progress of the region, democracy and good governance.	Valle del Cauca, Cali.
Propacifico	To promote the operation and development of the foundation's corporate purpose, which promotes high-impact projects and initiatives that contribute to the comprehensive and sustainable development of Cali, Valle del Cauca and the Colombian Pacific	Valle del Cauca

From the Bank we make financial contributions to trade associations, guilds, groups that are exempt from taxes in accordance with the company's policy. We do not participate in political campaigns, referendums, ballot measures, or hire lobbying groups. Our investment during 2024 is detailed below:

	2022	2023	2024
Lobbying, Interest Representation, or Similar	0	0	0
Local, regional or national political campaigns/organizations/candidates	0	0	0
Trade associations or tax-exempt groups (e.g., expert groups)	$1.064.014	$1.111.626	$1.156.255
Other (e.g., expenses related to ballot measures or referendums)	0	0	0
Total contributions and other expenditures	**$1.064.014**	**$1.111.626**	**$1.156.255**
Data coverage (as % of denominator, indicating the organizational scope of the data reported)	**100%**	**100%**	**100%**



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Stakeholder Engagement

I GRI 2-29 I

We engage with diverse stakeholders to foster transparency, improve decision-making, and strengthen relationships. To do this, we use different communication channels, such as newsletters, presentations, emails and social media, with a frequency appropriate to each group.

Stakeholder	Characterization		Channels	Periodicity
Government and Regulatory Bodies	→ Superintendence of Industry and Commerce → Finance Superintendence	→ Banco de la República → Colombian Stock Exchange	Legal contact mailbox	Quarterly
Governing bodies	→ Board of Directors	→ Steering Committee	Board of Directors / Sustainability Steering Committee	Biweekly / Quarterly
Clients	→ Business Banking (government, institutional, medium-sized corporate, large business, SME)	→ Personal Banking (Elite plus, elite, Preferred plus, preferred)	Email and social media	Monthly / On Demand
Opinion Generators	→ Public opinion → Mass media	→ Alternative media	Traditional media	On demand
Human Team	→ Employees → Affiliates	→ Fondoccidente → Union	Corporate mailboxes	On demand
Communities	→ Planeta Azul Community → Social Media Users	→ Universities → Entities supported by Social Investment	Correo Planeta Azul, bank social media and mailbox (selection and sustainability)	Monthly / On Demand
Guilds	→ Asobancaria → Asofondos	→ Anif → Chambers of Commerce	Bank mailbox	Quarterly
Shareholders	→ Grupo Aval	→ Shareholders' Assembly	Website and shareholders' assembly Email	Annual / On Demand
Suppliers	→ Logistics		Bank mailbox	Quarterly
Allies	→ WWF → Correspondents → ADL → Dale! → GPTW	→ Second Tier Banks (Bancoldex, Finagro, Findeter) → IDB → Product Partners (UNICEF, concessionaires, construction companies, etc.)	Bank mailbox	Quarterly



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Sustainability

Creating Shared Value



Great Place To Work. Certificada AGO 2024-AGO 2025 COL

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Banco de Occidente | Grupo AVAL

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FACILIDAD

ESG Strategy and its Impact

SDG 8.5; 9.3; 13.2
| GRI 2-23; 2-29; 3-1; 3-2; 3-3 |

At Banco de Occidente, sustainability is an essential part of our management. From the **Sustainability Management,** we work in coordination with the different areas of the bank to integrate environmental, social and governance criteria into our operations, ensuring that each decision has a positive impact on the environment, on our customers and on the communities where we operate.

Our sustainability strategy is based on the creation of long-term value for our stakeholders, promoting a balance between economic growth, environmental management and social well-being. We take a comprehensive approach that allows us to mitigate risks and seize sustainability opportunities, ensuring a responsible and resilient operation in the face of global challenges.

Our strategy is aligned with the **Global Pact** and the **Sustainable Development Goals (SDGs),** as well as with good practices of the **Asobancaria Green Protocol** and **Principles for Responsible Banking (PBR).** This has allowed us to consolidate efforts consistent with international trends and advance in our commitments to sustainable development.

In 2024, we participated for the second time in S&P Global's annual corporate sustainability assessment (CSA), achieving **48 points,** which represents an advance of 6 points compared to the previous year and positions us in the **79th percentile*** globally in the banking industry. This result allows us to measure our performance against more than 660 companies in the sector, identify our strengths and draw a roadmap to continue moving forward.

Thanks to the joint work of the teams and the support of the leaders of the different areas, we have strengthened our management of ESG criteria, consolidating a solid strategy with clear goals. Our goal is to continue climbing positions in this evaluation and continue to advance towards the goal of being one of the **most sustainable banks in the world.**

*These results correspond to January 2025.

Sustainability management is based on key policies and ongoing dialogue with our stakeholders. Our strategy includes a participatory approach to identify expectations, prioritize key issues, and build trusting relationships with all relevant stakeholders. To this end, we have integrated ESG principles into our operations, financial products and strategic decision-making, which allows us to better serve the needs of our clients and contribute to the development of a more resilient and equitable financial system. In addition, we adopt responsible business conduct, integrating environmental and social criteria into our business activities and throughout our supply chain.

> Our sustainability strategy is based on the **creation of long-term value for our stakeholders, promoting a balance** between economic growth, environmental management and social well-being.



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

Our strategy is structured around **three fundamental axes:**



In 2024, we reinforced this strategy to further align it with the organizational purpose, consolidating our sustainability commitments and objectives and achieving greater articulation between the different initiatives we have in the bank.

Alignment of the ESG Strategy with the SDGs

As a financial institution, we are aware of our role in promoting sustainable economic development. In this sense, we align ourselves with the United Nations 2030 Agenda and contribute to various targets of the Sustainable Development Goals (SDGs), focusing on those where our impact is most significant.

Through our ESG strategy, we support the development of sustainable cities and climate change mitigation. In particular, we contribute to the following SDGs:



Our contribution to the SDGs is materialized through initiatives such as sustainable financing, financial education programs, the promotion of gender equality in access to credit, the promotion of renewable energies and the development of financial solutions that foster economic and social resilience. In this way, we ensure that our ESG strategy is aligned with global challenges and contributes to the well-being of society and the environment.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Materiality Analysis



At Banco de Occidente, the materiality determination process is carried out every two years, and is based on an exhaustive analysis of the most relevant issues from both an internal and external perspective. This exercise is conducted in alignment with GRI reporting frameworks and Dow Jones Sustainability Index requirements, considering the most significant economic, social, and environmental impacts for the organization and its stakeholders.

Our materiality process involves the active participation of external stakeholders, who are invited to contribute to the identification and prioritization of material issues. This engagement includes consultations with groups such as customers, regulators, suppliers, communities and others, allowing us to take a broad view of the expectations and concerns that affect us as a bank and the environment in which we operate. Through this exercise, we ensure that material topics not only reflect the needs of the business, but also those of external stakeholders.

Material issues are prioritized through a materiality matrix, which is used to evaluate both the impact of the different issues on internal operation and their impact on society and the environment. The matrix considers the risks and opportunities associated with each topic, allowing the identification of strategic priorities in the short, medium and long term.

In addition, the materiality assessment is fully integrated into our risk management (ERM) process. This integration is key to ensuring that material risks and opportunities are addressed within the institution's overall risk management and to maintaining continuous alignment between our business strategy and sustainability requirements.

The evaluation process is externally verified, which provides transparency and reliability to the results. Subsequently, the results of the materiality analysis are presented to the Board of Directors, who review and approve the strategic priorities derived from this exercise. This approach ensures that the bank's key decisions are informed by the material issues most relevant to our sustainability and long-term value creation.

The information related to this process, as well as the results of the materiality analysis, are publicly available in our management and sustainability reports, thus ensuring compliance with international standards and our transparency towards stakeholders.

Why and how did we do it?

In line with our purpose of making the development of people, the growth of businesses and the transformation of the country a reality, we carried out a process of review and updating of our material affairs, in collaboration with the consulting firm Bufete para el Desarrollo Sostenible (BDS Group).

This exercise was developed following the Double Materiality model, which addressed two key perspectives. The first, from the financial approach (from the outside in), aimed at identifying the current and future risks that ESG issues generate in our financial situation, development, performance and position. These factors can influence our value and business continuity. The second perspective, impact (from the inside out), exhaustively evaluated the actual and potential material impacts, both positive and negative, that our operations and portfolio generate on the environment and on our stakeholders.

This analysis was carried out in compliance with the requirements of the Finance Superintendence of Colombia through circulars 031 of 2021 and 012 of 2022, as well as the new requirements of GRI.

Dual materiality analysis is a strategic tool that allows us to identify and assess issues that influence economic, social and environmental value creation. Its purpose is to comprehensively address the impacts on the environment and the expectations of our various stakeholders, in addition to managing risks and impacts related to ESG aspects, which could have financial implications with an impact on business continuity. This exercise was based on the scientific method, the ISO 31000 standard, and the methodologies of EFRAG, SASB, TCFD and GRI version 2021.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Steps for the determination of Double Materiality:

1. Definition of ESG Start–Up.

2. Impact materiality:

a. Diagnosis of potential positive and negative impacts.
b. Impact assessment with prioritized stakeholders.
c. Impact materiality results.

3. Financial materiality:

a. Financial risk assessment.
b. Heat map.
c. Financial materiality results.
d. Indicators with the greatest impact.

4. Determination of double materiality according to methodological criteria and qualification thresholds.

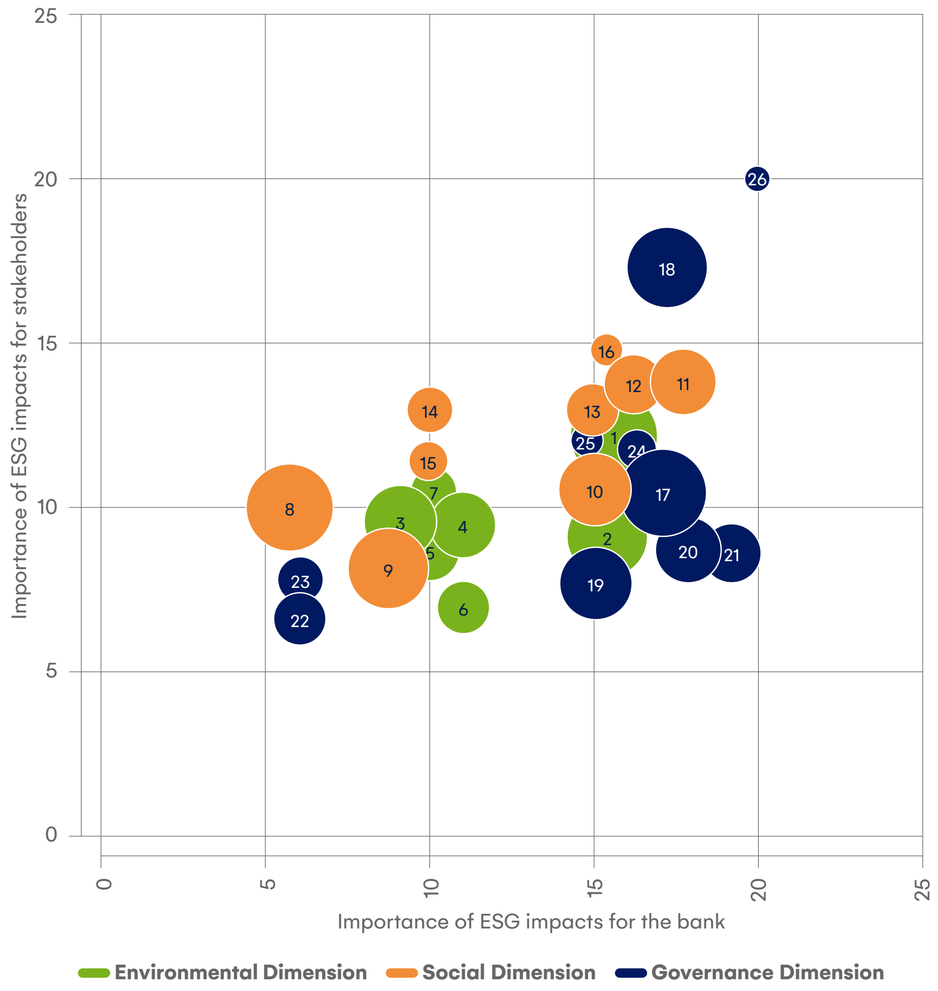


VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

We conducted an exhaustive review of ESG trends through 53 benchmarks, including country bets, material issues identified by national and international peers, risk rating agency assessments, and ESG issues managed from our parent company, among others. As a result of this analysis, we identified a total of 813 issues, 220 environmental, 237 social and 356 governance. This exercise allowed us to prioritize the most relevant issues for the bank, establishing the following 26 issues as the most significant within each dimension:

No.	Dimensión	Asuntos Materiales
1	Environmental	Financed Emissions
2	Environmental	Climate risk management
3	Environmental	Direct emissions
4	Environmental	Protection of biodiversity and ecosystems
5	Environmental	Management of waste and materials
6	Environmental	Energy efficiency
7	Environmental	Operational eco-efficiency
8	Social	Social investment
9	Social	Financial inclusion
10	Social	Respect for Human Rights
11	Social	Memorable experience of customers
12	Social	Satisfactory financial solutions
13	Social	Human Development
14	Social	Labor Relationships
15	Social	Diversity and inclusion
16	Social	Financial education
17	Governance	Ethical governance
18	Governance	Regulatory and legal compliance
19	Governance	Responsible marketing
20	Governance	Technology and digital transformation
21	Governance	Information security, cybersecurity and system availability
22	Governance	Responsible management of supply chain
23	Governance	Leadership on ESG Affairs
24	Governance	Profitable growth
25	Governance	Sustainable finances
26	Governance	Risk management





Impact Materiality

Impact materiality aims to evaluate and understand the effects that our activities generate on the environment, considering both positive and negative impacts. This process involved a thorough diagnosis of how our operations affect the environment, natural resources, climate change, human rights, and social well-being. The impact criteria considered were:

- **Favorable:** positive impacts that generate tangible and measurable benefits, such as reducing emissions or promoting gender equality.
- **Unfavorable:** negative impacts, such as pollution or human rights violations.

Once assessed, we assign a level of relevance to each issue, taking into account the magnitude, scope, and probability of occurrence of the impacts, as well as the ability to remediate them.

Stakeholders

We identify and prioritize key stakeholders, based on their influence and the impact they have on our operations. We then conducted a survey to learn about their concerns and perceptions of the ESG issues most relevant to the bank. The priority stakeholders were the following:

- **Shareholders.**
- **Clients.**
- **Senior Management.**
- **Board of Directors.**
- **Employees.**
- **Communities.**
- **Strategic allies.**
- **Suppliers.**
- **Guilds.**

Through this process, we determined which ESG issues are priorities for the bank and its environment. The outcome of the consultation, together with the internal diagnoses, allowed us to define a clear vision on the impacts and how to address them effectively.

Financial Materiality

SDG 8.3

At Banco de Occidente, financial materiality aims to identify and evaluate ESG issues that may have a significant impact on our financial condition, operating performance and compliance with our corporate strategy.

To carry out this assessment, we start by identifying ESG issues relevant to our industry. We analyze the possible risks and impacts associated with each of these issues and their relationship with the business.

Once the risks and impacts associated with ESG matters were identified, we conducted a detailed assessment involving 9 members of our Senior Management, 5 representatives of the Board of Directors and 14 heads of the risk and strategy areas. In addition, we have the assessment of BDS Group, who analyzed and rated ESG matters according to their relevance and their potential impact on Banco de Occidente's financial and operational stability.

This process included the analysis of: type of risk, magnitude, scope of impact, probability of occurrence, remediability, and impact on our strategic indicators.

The result of this assessment allowed us to identify ESG issues that represent a significant financial risk, making it easier to make informed strategic decisions and take action to address those risks.



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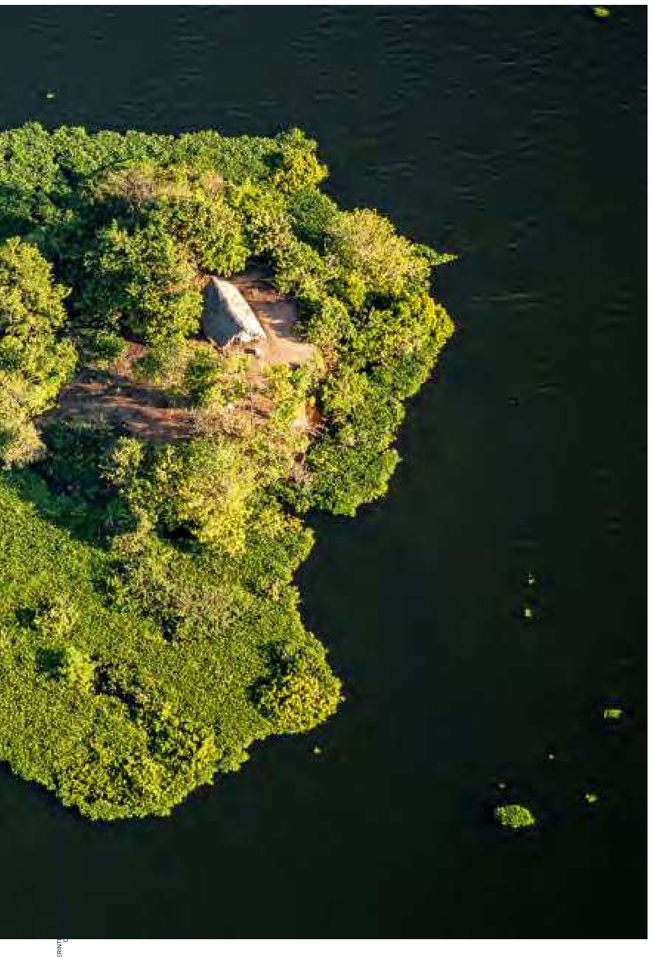
Material Issues for Business Value Creation

At Banco de Occidente, our materiality analysis has identified the three key material issues that have a significant impact on the business, which we consider to be determinants for long-term value creation. These issues not only directly impact our strategy and operations, but are also critical factors in ensuring the bank's sustainability and growth going forward. Below, we detail these three material topics:

	Material Topic 1	Material Topic 2	Material Topic 3
Material risk or opportunity	**Climate Risk Management:** Climate change is a critical issue that affects our long-term performance due to increasing regulation on sustainability and the demand for green financial products. The transition to a low-carbon economy represents both a risk and a significant opportunity for our bank. Managing this risk is essential to mitigate impacts on our credit portfolio and ensure compliance with international regulations.	**Human Development:** talent management is crucial to maintain our competitiveness and capacity for innovation. Investing in the training and development of our employees has a direct impact on our operational efficiency and our ability to better serve our customers. In addition, aligning our talent strategies with sustainability and employeese well-being also reinforces our reputation and social commitment.	**Technology and digital transformation:** digitalization and the incorporation of advanced technologies are essential to improve the efficiency of our services and access new markets. Offering sustainable financial products through digital platforms not only meets customer expectations, but also positions us as a leader in financial innovation and allows us to reduce operating costs in the long term.
Business Case	The transition to a low-carbon economy involves a number of opportunities, such as financing sustainable projects and attracting customers interested in green products. However, it also presents operational risks due to increasingly stringent regulations and the potential obsolescence of unsustainable assets. Managing these risks allows us to reduce costs associated with non-compliance with regulations and position ourselves in the market as a responsible and sustainable entity.	Human talent is the engine of our innovation and growth. Investing in development and training programs can improve operational efficiency, reduce employeese turnover and increase customer satisfaction. In addition, a skilled team is critical to implement our sustainable strategies and adapt our products and services to the needs of a changing market. This translates directly into an increase in profitability and operational efficiency.	Digitalization allows us to offer more accessible, efficient and sustainable financial products, reducing operating costs and improving customer satisfaction. Through sustainable financing, we not only respond to the expectations of investors and regulators, but also open up new revenue streams. In addition, the integration of emerging technologies into our product offering strengthens our competitiveness in the long term, ensuring our relevance in the market.
Business Impact	Integrating sustainability and climate risk management into our business strategy not only reduces financial risks related to climate change, but also strengthens our reputation as a responsible entity, generating value both in terms of revenue and stakeholder satisfaction. This approach contributes to the bank's long-term stability.	The impact of this strategy is wide-ranging, as well-trained and engaged staff translates into higher performance, lower turnover, and a better relationship with customers. In addition, this contributes to a better corporate image and reputation.	The implementation of advanced technologies not only optimizes our internal processes, but also allows us to serve a broader market with innovative solutions, creating a constant stream of value for our clients and for the institution.
Business Strategies	We are implementing a comprehensive strategy to decarbonize our operations and financing. This includes financing green projects, integrating environmental criteria into our credit decisions, and aligning with international climate change regulations. In addition, we have set long-term emission reduction targets, which drives our investment decisions and ensures the sustainability of our operations. In parallel, we integrate climate risk assessment into our risk management system (ERM) to ensure that our decisions are aligned with sustainability goals and regulatory compliance.	We have launched initiatives to strengthen the development of our employees, including leadership programs, well-being and training in various topics. In addition, we are implementing inclusion and diversity policies to improve staff satisfaction and engagement. These strategies are aligned with our vision to be an innovative and socially responsible company, which reinforces our organizational culture and improves long-term performance.	Our digital strategy focuses on modernizing our banking services, providing digital access platforms for sustainable financial products, such as green loans. We are also investing in emerging technologies, such as artificial intelligence and data analytics, to optimize our operations and deliver personalized customer experiences. These initiatives allow us to be leaders in the sustainable financial sector and stay competitive in a digitalized market.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

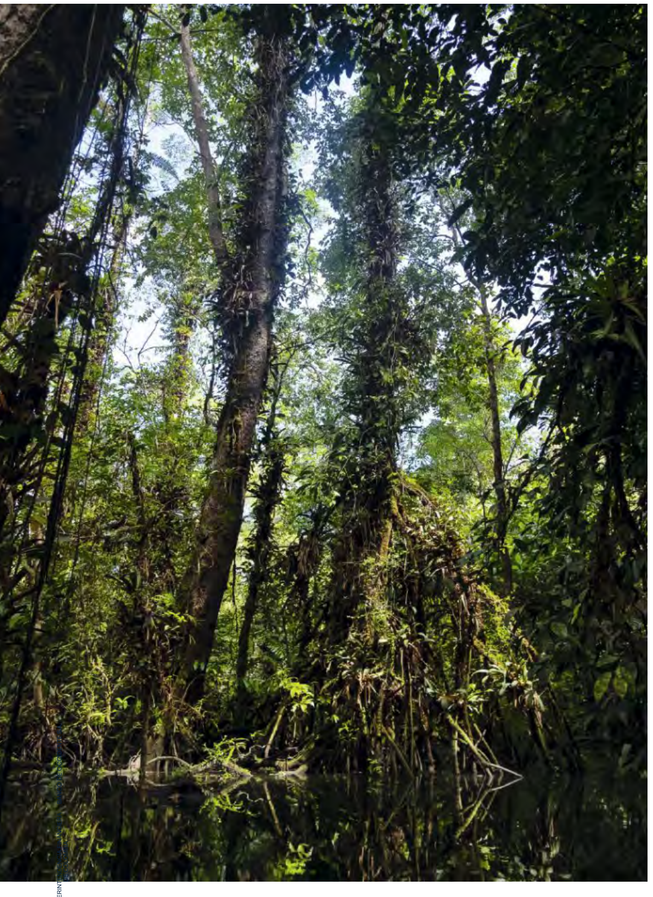
Materiality metrics for business value creation



	Material Topic 1	Material Topic 2	Material Topic 3
Material Issue	Climate Risk Management.	Human Development.	Technology and digital transformation.
Objective/ Metric	Climate Risk Management: Our goal is to reduce carbon emissions from the loan portfolio by 2030. In addition, we have set a goal of financing $8 trillion in sustainable projects by 2030 that are committed to the transition to a low-carbon economy.	Our goal is to improve employees satisfaction by 93% by 2025, based on the results of annual work environment surveys. In addition, we seek to increase participation in training programs to 83% of our employees by 2025.	Our goal is to increase the market share of sustainable financial products by 2030. In addition, we seek to digitize our operational processes by 2030.
Target Year	2030 reduction of emissions and greater financing of sustainable projects.	2025 Training in sustainability and employees satisfaction.	2030
Progress	Progress toward the emissions reduction goal is monitored annually. Currently, we have managed to reduce our emissions compared to the base year. In terms of financing sustainable projects, we have reached **3.43 billion of the $8 trillion** established.	Progress in employees satisfaction shows an increase compared to the last survey conducted in 2023. In terms of training, **80%** of our employees have completed the training programs planned for 2024.	To date, we have managed to digitize a large part of our operational processes, bringing us closer to the goal for 2030. In terms of sustainable financial products, we have achieved a significant market share.
Executive remuneration	Based on market best practices, we recognize that one of the key actions to accelerate the implementation of the Bank's climate strategy is to generate incentives for senior management and employees. To this end, since 2023 we have been evaluating the most appropriate methodology to integrate climate change into the remuneration and incentive scheme managed by the Bank. In 2025, we will focus primarily on defining the characteristics and criteria of short- and long-term incentives along with the internal beneficiaries, the most appropriate type of incentive, and metrics to track progress.		

VIGILADO SUPERFINANCIERA

Material issues for external stakeholders



	Impact 1	Impact 2
Material issue	Carbon Emissions and Climate Change (Environmental Impact)	Financial Inclusion and Access to Financial Services for Women-Led SMEs (Social Impact)
Cause of impact	Financing and investment activities in infrastructure and energy projects contribute to greenhouse gas emissions, particularly those related to the energy sector and construction. This cause is mainly associated with the financing of projects that are not sustainable in terms of carbon emissions, which is a central aspect of our materiality assessment in the environmental context.	The lack of access to financial services, especially in the case of women entrepreneurs and businesswomen in small and medium-sized enterprises (SMEs), generates economic exclusion that limits development opportunities. Women, particularly those who lead businesses, face barriers of an economic nature: SMEs led by women tend to have less access to capital due to a lack of credit history. Social: Women often face difficulties in accessing financial services due to prejudice and the lack of a supportive environment that favors female entrepreneurship. Infrastructure: Poor financial infrastructure can hinder the availability of products tailored to the specific needs of women-led SMEs, limiting their ability to formalize or expand their businesses.
External stakeholders/ impact area(s) assessed	Customers, local communities, governments and society in general, as well as the environment.	Customers, small and medium-sized enterprises (SMEs)
Relevance of the topic for external stakeholders	The impact of carbon emissions is significant for external stakeholders due to its contribution to global climate change and its effects on health, biodiversity, and vulnerable communities. This issue is closely linked to long-term sustainability and affects the company's reputation, as well as relationships with regulators and customers who demand more sustainable products and services.	For SMEs led by women, the lack of access to adequate financial products not only affects individual economic stability, but also restricts the growth of these companies, preventing their expansion and generating a significant gap compared to companies led by men. This situation has a direct impact on local economic development, as women represent a key source of innovation and employment.

VIGILADO SUPERFINANCIERA

Materiality metrics for external stakeholders



	Impact 1	Impact 2
Material issue	Carbon Emissions and Climate Change (Environmental Impact)	Financial Inclusion and Access to Financial Services for Women-Led SMEs (Social Impact)
Output Metric	CO2e emissions generated by the funded projects, measured in tons of CO2e. This quantitative metric is used to measure the direct impact of our financing activities on climate change, in order to manage them.	Number of women-led SMEs that have accessed financial products through our financial inclusion programs. This includes savings accounts and small-scale loans.
Impact assessment	We have performed an impact assessment by converting CO2e emissions into a broader social and environmental impact. This is measured using the carbon footprint of our operations and the potential for CO2e mitigation by financing sustainable projects, which are less polluting compared to traditional projects.	To evaluate the effectiveness of our programs, we use indicators such as: Number of Beneficiaries: Number of women entrepreneurs who have accessed financial products through our programs.
Impact Metric	The quantitative metric used to measure external impact is the calculation of CO2e emissions in annual tons derived from funded projects.	The impact metric to evaluate the effect of our financial inclusion programs on women-led SMEs focuses on the number of beneficiaries who have experienced an improvement in their economic situation.

VIGILADO SUPERINTENDENCIA FINANCIERA DE COLOMBIA

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Climate Strategy and Decarbonization

SDG 7.3; 13.2; 15.1

At Banco de Occidente, we are actively committed to sustainability and the transition to a low-carbon economy. Through our climate strategy, we integrate environmental considerations into our decisions, promote impact reduction, and strengthen our capacity to adapt. In this section, we present our approach and key actions to contribute to a more sustainable future.

Climate change

We recognize that climate change is a global challenge that demands immediate action. For this reason, we integrate climate criteria into our strategy and risk management, promoting sustainable financing and strengthening our capacities in disclosure and transparency. For more details on our approach and progress, we invite you to consult **Annex 3** of our TCFD report.

Financed emissions

We are committed to sustainability and responsible management of our environmental impact. As a financial institution, we understand that our contribution to the transition to a low-carbon economy lies not only in our own operations, but also in the environmental impact of the sectors and projects we finance.

For this reason, in 2024 we carried out our first measurement of **financed emissions,** a key exercise for understanding and managing our indirect carbon footprint. This assessment was carried out based on our 2023 portfolio, prioritizing three strategic sectors: **Oil & Gas, Construction and Power Generation.** The selection of these sectors responded to their significant impact on the environment, the amount of emissions generated in their operations and the availability of information.

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To carry out this measurement, we adopted the methodology developed by the Partnership for Carbon Accounting Financials (PCAF) and used the tool provided by the Sustainable Banking Alliance (ABS) in Colombia, supported by USAID and Asobancaria. This methodology allowed us to quantify the absolute scope 1, 2 and 3 emissions of the prioritized sectors, considering the balances of our 2023 portfolio.

In this first measurement, the data was broken down by asset class (corporate loans and Project Finance), sector/industry (Oil & Gas, Construction and Power Generation), segment (Large Corporate and Business Banking customers) and country/region (Colombia – 100%). This initial analysis is a fundamental starting point and we will include new sectors in the calculation annually to have a more comprehensive view of our carbon footprint.

While we don´t currently have specific reduction targets or net-zero targets, this measurement marks the beginning of a structured path to understanding the carbon footprint of our funded operations. Based on these results, we will work on the formulation of strategies and action plans that will allow us to support our clients in the transition to more sustainable business models.

Additionally, as part of our commitment to sustainability, we have internal policies that establish guidelines to mitigate environmental impacts in our financing operations. Our Sustainable Finance Guidelines, the Environmental and Climate Change Policy and the Environmental and Social Risk Management System (SARAS) Policies are key tools in this process. These policies allow us to identify clients with high environmental impacts, sectors vulnerable to climate change, and opportunities to foster sustainable investments through our Sustainable and Transition Taxonomy.

The Bank's senior management plays a key role in this commitment. In 2022, we created the Sustainability Committee, which is responsible for making strategic decisions on environmental, social and governance (ESG) matters. This committee oversees, among other aspects, the management of our financed emissions and allows us to consolidate a comprehensive strategy to align our operations with the global decarbonization agenda.

We know that addressing the challenge of financed emissions requires joint efforts, which is why we actively participate in collaborative initiatives with other financial institutions and industry associations. Our participation in the Sustainable Banking Alliance (ABS) in Colombia has allowed us to access standardized tools and methodologies to improve the measurement of our emissions and work hand in hand with other actors in the implementation of best practices in the industry.

This is just the first step on a path that will allow us to more effectively manage our indirect environmental impact. As we move forward in this process, we will continue to strengthen our capacities, explore new opportunities for sustainable financing, and develop strategies that allow us to reduce financed emissions, thus contributing to the construction of a more sustainable and resilient economy.

> As part of our commitment to sustainability, we have **internal policies that establish guidelines to mitigate environmental impacts** in our financing operations.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Scope 3 Absolute Financed Emissions

For the 2023 portfolio, Scope 3 absolute financed emissions were estimated at 4**68,594.62 metric tons of CO2 equivalent** and with an on-balance sheet asset/product portfolio coverage of **6%.**

Below is detailed information by sector and by asset class:

Sector	Balance	%	Scope 1+2 (Ton CO2)	Scope 3 (Ton CO2)	Total CO2 (Ton)
Construction	$2.076.496.277.500	4,75%	7.946,81	89.460,58	97.407,39
Power Generation	$449.095.535.300	1%	128.174,06	29.284,44	157.458,50
Oil & Gas	$89.889.198.822	0.2%	201.235,54	12.493,18	213.728,72
Total	**$2.615.481.011.622**	**6.0%**	**337.356,41**	**131.238,20**	**468.594,61**

ISIC were prioritized by sector:
Construction: 4210, 4220, 4290 and F (the latter is taken as a group for some clients in the sector that do not include ISIC construction in their main activity but the operations financed are related to the sector)
Oil & Gas: 3520 y 0610
Power generation: 3511

Sector	Balance	%	Scope 1+2 (Ton CO2)	Scope 3 (Ton CO2)	Total CO2 (Ton)
Corporate Loans	$ 1.074.608.700.000	2,5%	278.484,22	60.036,19	338.520,41
Project Finance	$ 1.540.872.311.622	3,5%	58.872,17	71.202,03	130.074,20
Total	**$2.615.481.011.622**	**6.0%**	**337.356,41**	**131.238,20**	**468.594,61**

Key Data from the Measurement of Financed Emissions

As part of our commitment to measuring and managing financed emissions, we have conducted a detailed analysis of our prioritized portfolio in 2023. Here are some of the main results obtained in this exercise:

- **Number of customers evaluated: 426**
- **Number of operations analyzed: 1.631**
- **Data quality used in the measurement: 4.8.**
- **Emissions intensity metric: 0.18 tons of CO_2 for every million pesos financed (ton CO_2/MCOP).**

These results reflect our first effort in quantifying financed emissions and will serve as a basis for future reduction strategies and support our clients in the transition to a low-carbon economy.



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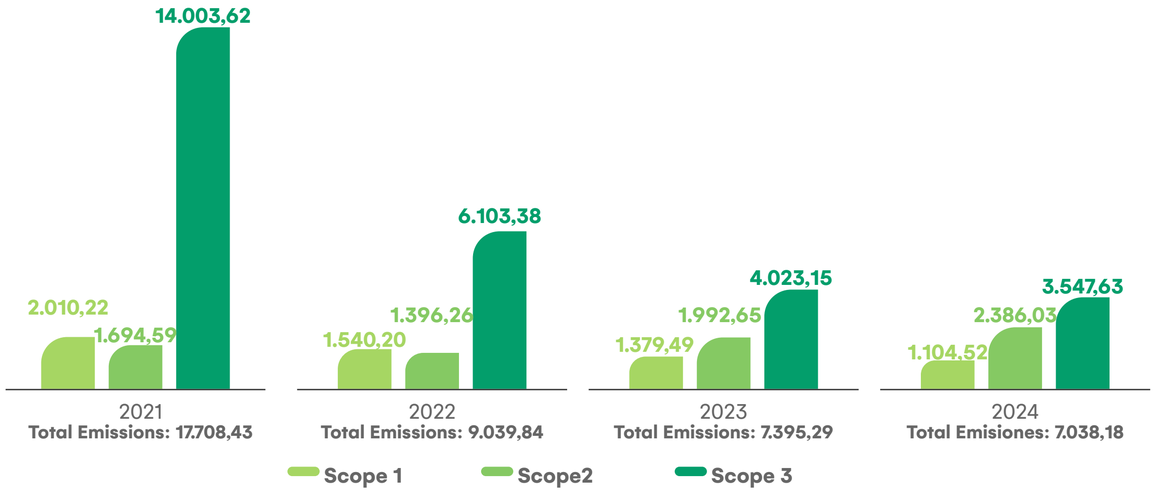
Emissions Management — Carbon Footprint

SDG 7.3; 11; 13.2
GRI 305-1; 305-2; 305-3; 305-4; 305-5 |

As part of our eco-efficiency goals, we committed to reducing direct emissions in our scopes 1 and 2 by 42% by 2030, in line with the scientific goals of limiting global warming to 1.5°C. We continue to review the process for the presentation and validation of reduction targets before the SBTi initiative in the medium term, which is why we have participated in webinars, talks given by external parties (Global Compact and Asobancaria) to obtain a greater understanding of the process and the activities involved.

We established as our baseline the emissions generated during 2022 due to the stability of the data obtained for that period. The emissions generated and the reduction achieved are detailed below:

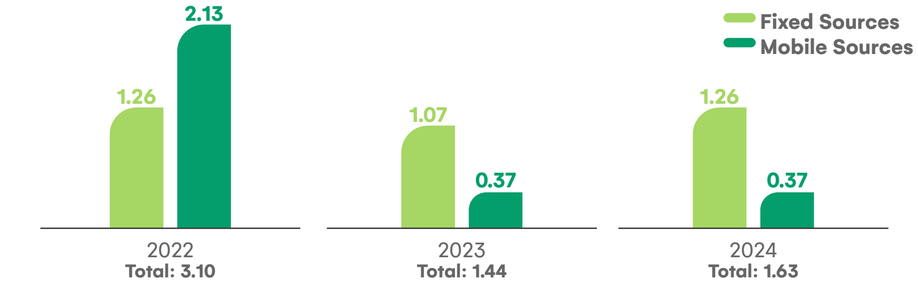
Emissions Generated



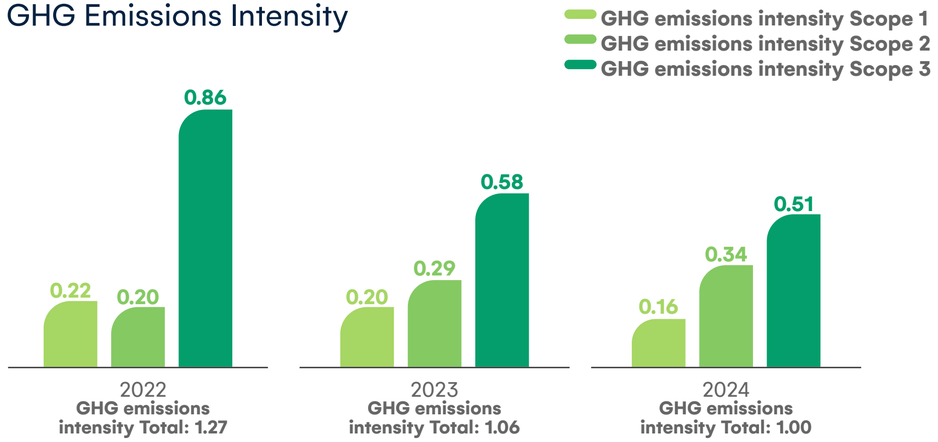
The calculation of our emissions is under the GHG Protocol standard with a focus on consolidation of operational control and, due to the emission sources identified, CO2, CH4, N2O, SF6, HCFs and HCFCs are included in the calculation.

On the other hand, biogenic emissions are presented with a variation that is due to fuel consumption in fixed and mobile sources. Specifically, we had an increase in fuel consumption in power plants that was offset by the decrease in fuel consumption by vehicles:

Biogenic Emissions

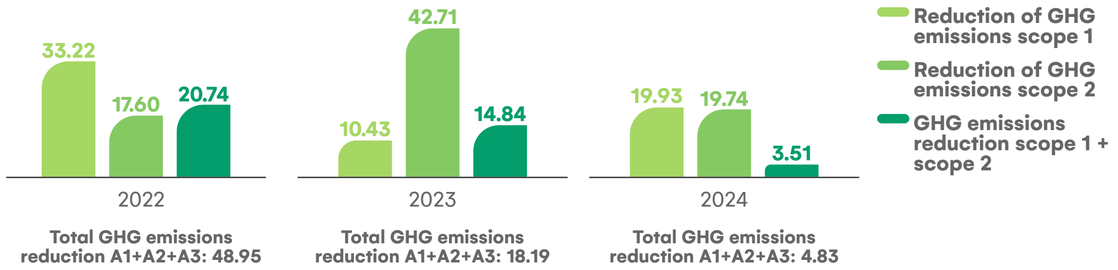


GHG Emissions Intensity

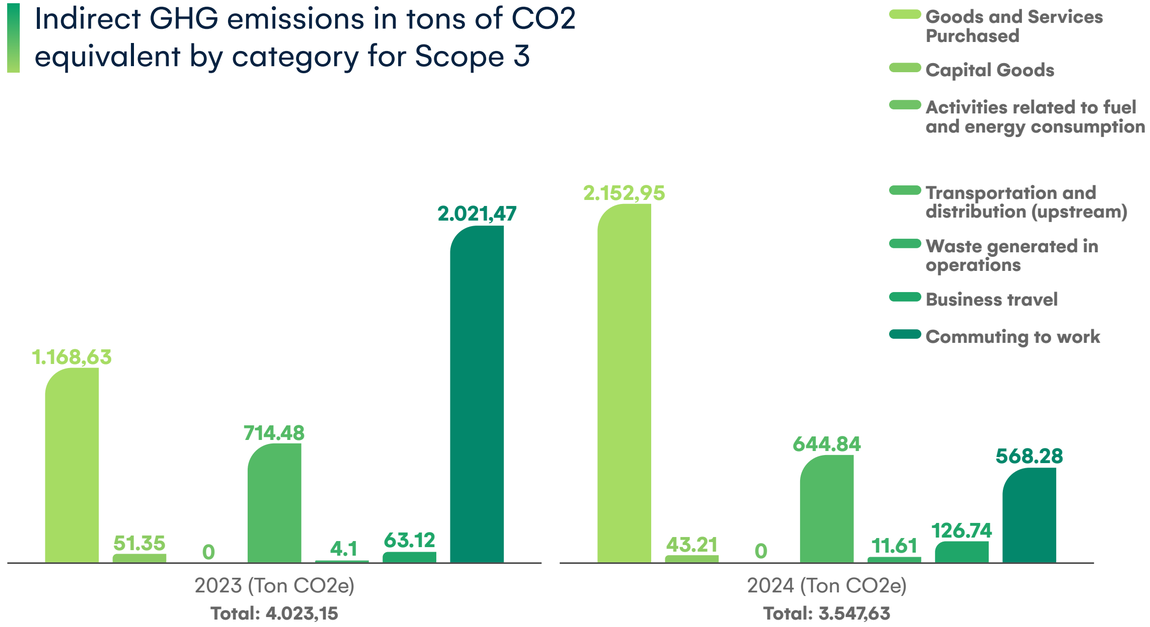


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GHG Emissions Reduction (%) – Ton CO2e



Indirect GHG emissions in tons of CO2 equivalent by category for Scope 3



We achieved a reduction in our scope 1 emissions mainly explained by decreases in fuel consumption from mobile sources and refrigerant gases corresponding to air conditioners. We also continue with preventive maintenance on air conditioners that contribute to reducing fugitive emissions.

Despite the reduction in energy consumption in 2024 at our facilities, the emission factor delivered by XM for the National Interconnected System had a variation of 20.3% compared to that of 2023, which affected the result of our scope 2 emissions.

In 2024, we managed to significantly reduce our scope 3 emissions, mainly due to the decrease in paper consumption, and the transportation of employees to and from the Bank. This last aspect has been supported by both the hybrid work scheme and the Sustainable Mobility Program.

Overall, our total emissions showed a reduction of 4.83% vs 2023 and 22.1% compared to 2022, in response to the initiatives and actions undertaken during 2024 and positively points to the fulfillment of reduction goals according to the 2030 Agenda and Eco-efficiency Plan.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Sustainable Mobility

SDG 9.3; 11; 13.2
| BdO-7 |

During 2024, we continued with our Sustainable Mobility Program in collaboration with the company Try MY Ride.

This program aims to provide benefits both to our employees, offering them safe mobility alternatives, and to the environment, by encouraging the use of sustainable transportation.

To encourage employees engagement, we launched digital campaigns through our internal platform, the Try My Ride app and emails. Additionally, in 2024 we successfully filed the accreditation with the Mobility Secretariats of Bogotá and Cali of the Sustainable Mobility Business Plan, aligning our strategy with government entities.

These campaigns highlighted the importance of sharing routes and using alternative means of transportation, such as cycling and public transport. In addition, we held activation days at our administrative headquarters in Cali and Bogotá, where our ally Try My Ride provided details of the program and answered employees concerns.

In the second half of the year, as we completed our second year of operations, we expanded the coverage of the program, including employeeemployees from the administrative headquarters of Medellín and Barranquilla, who joined those of Cali and Bogotá. To celebrate our second anniversary, we organized recreational activities in the main buildings of Bogotá and Cali, where we shared with our employees the achievements obtained.

Thanks to the active participation of our employees, we closed the year with more than 2,000 users registered in the application and achieved the following impacts:

- More than **1,200 employees are actively involved** in the program, of which **59 percent are women.**
- Multiple mobility alternatives are promoted for commuting from home to work and vice versa.
- In 2024, **we avoided the emission of 47,409 kg (47.4 Ton CO2eq),** equivalent to the absorption of CO2 by 1,580 trees, exceeding our goal of 34,000 kg of CO_2 eq in 2023.
- We generated savings of **more than $106,000,000 COP** in public transportation fares.
- We contributed to the reduction of harassment of women on public transport.

Thanks to this joint effort, **we exceeded our 2024 goals in terms of number of registered users (1,800) and avoided emissions (34 TCO2).**

By 2025, we will seek to continue expanding the number of users and the number of routes published, with the aim of encouraging sustainable mobility that allows us to increase the total emissions avoided and continue contributing to the sustainability and well-being of our employees.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Responsible Use of Resources

SDG 6.4; 7.3; 13.1

At Banco de Occidente, we promote the efficient and responsible use of resources as part of our sustainable vision. We implement actions to optimize energy and water consumption, properly manage waste and strengthen our environmental criteria in the relationship with suppliers. In this section, we share our initiatives and progress to minimize our impact and contribute to a more sustainable operation.

Energy

| GRI 302-1; 302-3; 302-4 |

On the other hand, we manage our energy consumption responsibly, aligning ourselves with our eco-efficiency goals and the transition to a more sustainable model. We implement strategies to reduce electricity consumption, optimize the use of renewable sources and minimize dependence on non-renewable sources. Through energy efficiency projects and technological improvements, we make progress in reducing our environmental footprint and contribute to the fulfilment of our 2030 Agenda.

By 2030, we have set a goal of reducing **our electricity consumption** by 20%, taking 2022 as a baseline. To achieve this goal, we are constantly working on the implementation of eco-efficiency initiatives that allow us to reduce our consumption by at least **2.5% per year.**

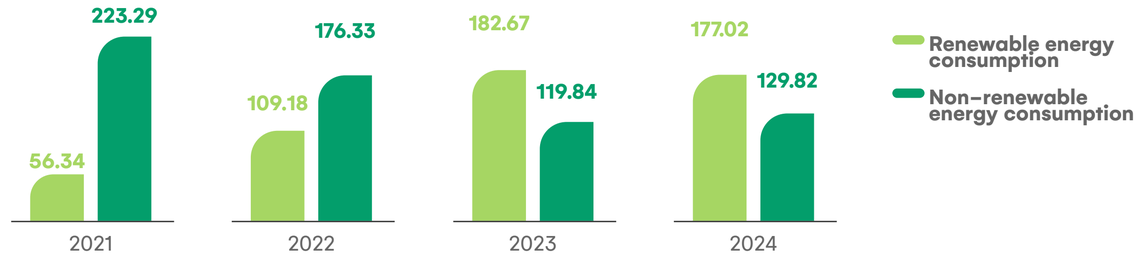
Electricity consumption (MWh)	
2021	13.859,64
2022	12.424,64
2023	11.531,51
2024	10.974,28

Since 2023, we have made progress in an energy efficiency project, through which we have progressively installed efficient lights, energy-saving technologies, solar control films and state-of-the-art air conditioning systems in our offices and headquarters. These devices have been shown to improve seasonal efficiency by up to 28% compared to other conventional solutions.

Given that most of these installations were completed in the last quarter of 2023, the real impact on the reduction of energy consumption was reflected in 2024, evidencing a significant decrease. As a result of these initiatives, we achieved a 4.9% reduction in energy consumption from the previous year and a cumulative reduction of 11.7% compared to our 2022 baseline.

This progress reflects our commitment to operational efficiency and sustainability, aligning ourselves with our eco-efficiency strategy and transition to a more responsible energy model.

MWh



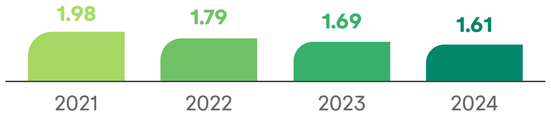
At Banco de Occidente, we promote the transition to a more sustainable operation through the use of renewable energy sources. In 2024, our six offices with solar panel systems operated throughout the year, reflecting a **3.1% reduction** in the renewable energy consumption indicator. This value will continue to evolve as we move forward with the installation of more photovoltaic systems in our offices and headquarters.

Our energy consumption from non-renewable sources comes mainly from the fuel used in the organization's power plants and own vehicles. Aware of the importance of reducing our environmental footprint, since 2022 we have implemented a vehicle leasing (renting) scheme, allowing us to optimize the use of our fleet and significantly reduce fuel consumption. Thanks to this strategy, in 2024 **we achieved a 36.01% decrease in energy consumption,** compared to the previous year.

We maintained our commitment to operational efficiency, using only three Bank fleets, which is two fewer than in 2023. However, during this period there was an increase in fuel consumption, due to the need to perform preventive maintenance in a greater number of power plants in different areas of the country.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Energy Intensity – MWh



Advances in our energy management have allowed us to achieve a **4.7% reduction in our energy intensity** in relation to the number of employees. This result reflects the positive impact of our energy efficiency strategies and the optimized use of resources, consolidating our commitment to sustainability and operational eco-efficiency.

Total Energy Consumption (MWh)	
2021	14.139,27
2022	12.710,15
2023	11.834,02
2024	11.281,12

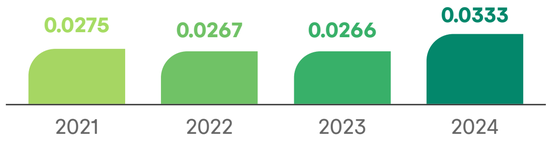
Water

| GRI 303-5 |

Water is a fundamental resource for our operations, and at Banco de Occidente we are committed to its responsible and efficient use. We implement strategies for the optimization of consumption, the reduction of waste and the adoption of technologies that allow us to minimize our environmental impact. Through these actions, we seek to strengthen our eco-efficiency and contribute to the preservation of this vital resource.

In our facilities, water is supplied by local aqueduct companies in each municipality and city where we operate, being used exclusively for domestic uses such as sanitation, cleaning and food. As for discharges, these correspond to domestic wastewater, which is treated and disposed of through the sewerage systems of each city, in compliance with current environmental regulations.

Water Consumption – M^3 Million

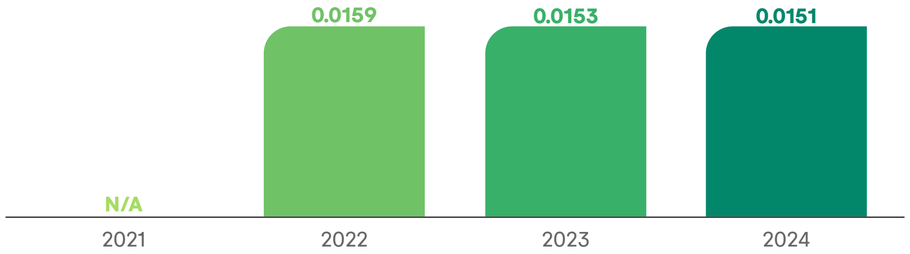


We manage our water consumption information through the Energy Master platform, where we consolidate quantitative and qualitative data and record bills from the Bank's operational sites.

In 2024, our water consumption was 0.0333 million m3, reflecting an increase of 25% compared to 2023. This increase responds to the improvement in the quality of the information and the expansion of its scope, including for the first time the data of the Cali Torre 1 Main Building, shared with entities of Grupo Aval. Given that this information does not have traceability in previous years, we have established 2024 as a new baseline without this affecting our 10% reduction goal, aligned with our Eco-efficiency Plan and the 2030 Agenda.

We continued to strengthen initiatives for the optimization of water resources, such as the installation of energy-saving and sanitary taps with flow control technology. In addition, we promoted the responsible use of water through our environmental education program aimed at our employees.

Water Consumption in Water-Stressed Areas – M^3 Million



This category includes cities identified as areas of water stress according to information provided by environmental authorities. These regions include Aguachica, Barrancabermeja, Barranquilla, Bogotá, Bucaramanga, Chía, Girardot, Girón, Guatapé, Medellín, Montería, Mosquera, Piedecuesta, Riohacha, San Gil, Siberia, Valledupar and Zipaquirá, all registered and monitored through our Energy Master platform.

Regarding water consumption in these areas, in 2024 we achieved a reduction of 5.63% compared to the previous year, reflecting the efforts and strategies implemented for the efficient management of water resources in our operations.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Waste

| GRI 306-3; 306-4; 306-5 |

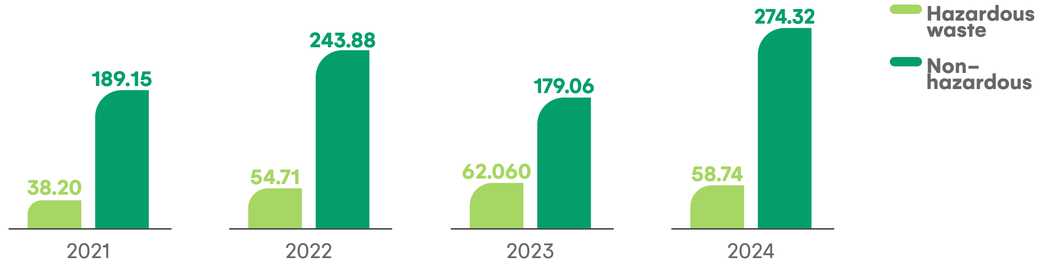
Responsible waste management is a priority in our commitment to sustainability. We implemented strategies focused on the reduction, reuse and proper disposal of the waste generated in our operations, aligned with our Eco-efficiency Plan and the principles of circular economy.

Through segregation at source, process optimization and raising awareness among our employees, we seek to minimize our environmental impact and contribute to meeting the objectives of the 2030 Agenda.

Within the framework of our **Integrated Waste Management Plan (PGIR),** we worked to identify and implement alternatives that allow us to **minimize the generation of hazardous and non-hazardous waste i**n all our activities and processes. The waste generated is managed responsibly through an **authorized environmental manager,** who is responsible for its proper disposal or use, in compliance with current legal regulations.

As part of our strategy, we held **awareness sessions** aimed at all our employees, with the purpose of promoting responsible practices that reduce and mitigate the environmental impacts associated with waste generation. These sessions focus on the **four main pillars of the PGIR:** prevention and minimization, internal waste management, external waste management, and monitoring and evaluation of the PGIR.

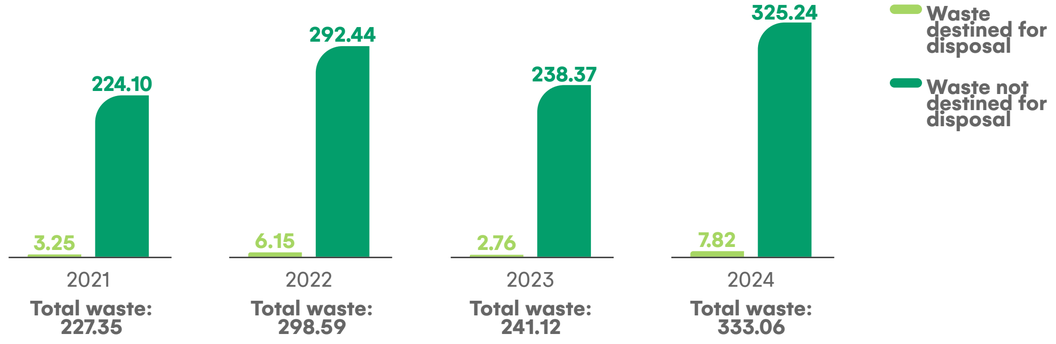
In line with our **Eco-efficiency Plan** and the **2030 Agenda,** we have set ourselves the goal of **gradually reducing the waste generated by 20% by 2030,** reaffirming our commitment to sustainability and responsible resource management.



By 2024, we managed to reduce the amount of non-hazardous waste destined for disposal in landfills. This waste, although common, special or ordinary, cannot be used due to its characteristics.

On the other hand, we increased the amount of usable waste, especially paper, metal, wood and cardboard, as a result of the remodeling processes in our offices and buildings. In addition, we strengthened reduction actions, such as the digitization of documents to minimize the use of paper and the promotion of remote work to reduce waste generation.

As for hazardous waste, in 2024 there was a considerable increase due to the disposal of construction and demolition waste, as well as other usable materials, such as metal, cardboard, wood and paper, within the framework of the remodeling carried out in our facilities.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Waste Management

In 2024, more than 95% of the waste generated was treated and used properly, in compliance with current regulations, thus reflecting the effectiveness of our management.

Given the type of activity we carry out, 80% of the waste generated is non-hazardous, and most of it is recycled or reused. Below, we present the detail by type of waste and its disposal:

Non-hazardous waste used



	Method of utilization	2023	2024
Plastic	Recycling	Weight 1,44 — 0,81%	Weight 6,92 — 2,54%
Archival Paper	Recycling	Weight 70,13 — 39,75%	Weight 86.2 — 31,59%
Metal	Recycling	Weight 53,26 — 30,19%	Weight 72,5 — 26,57%
Wood	Recycling	Weight 29,48 — 16,71%	Weight 31,4 — 11,51%
Textile	Recycling	Weight 1,67 — 0,94%	Weight 0,10 — 0,03%
Glass	Recycling	Weight 4,96 — 2,81%	Weight 4,2 — 1,54%
Cardboard	Recycling	Weight 14,92 — 8,45%	Weight 37,40 — 13,71%
Non-recoverable organic and inorganic waste		Weight 0 — 0%	Weight 0 — 0%
Marble	Use	Weight 0,09 — 0,05%	Weight 1,80 — 0,66%
Rubber & Tires	Use	Weight 0,30 — 0,17%	Weight 0,03 — 0,01%
Slurries, powders and process samples		Weight 0 — 0%	Weight 0 — 0%
Others UTP Cable, Ordinary and Special Waste	Use	Weight 0,18 — 0,10%	Weight 32,32 — 11,84%
Total Non-Hazardous Waste Used		Weight 176,43 — 100%	Weight 272,86 — 100%

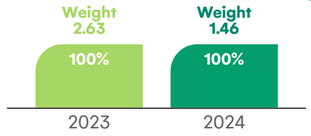
*The unit of measurement of the weight of waste is Tons.

Hazardous Waste Used		
	2023	2024
Used Oils	Weight 0 0%	Weight 0 0%
Lamp Waste	Weight 0.21 0.33%.	Weight 0.16 0,26%
Tonner Lexmark	Weight 0.54 0.41%	Weight 0.41 0.66%.
WEEE (Waste Electrical and Electronic Equipment)	Weight 61.19 98.80%.	Weight 51.80 98.91%
Total Hazardous Waste Used	61.94	52.37
	Method of utilization: Recycling.	

On the other hand, in 2024 we managed to reduce the disposal of non-hazardous waste in the landfill by 45%. However, hazardous waste disposal increased significantly due to the generation of construction and demolition waste, as well as the increase in lamps and batteries resulting from remodeling and construction activities in our offices and buildings. The amount of waste destined for disposal is presented below:

Non-Hazardous Waste Eliminated

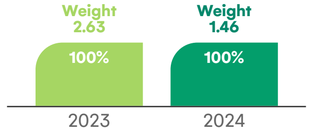
Common Ordinary Waste
Final Disposal Method: Landfill



Non-recoverable organic and inorganic waste / Waste from production sites / Rubber and tire waste/ Slurries, powders and process samples / Others



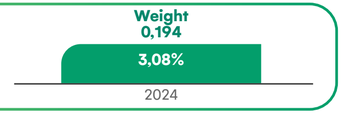
Total Non-Hazardous Waste Eliminated



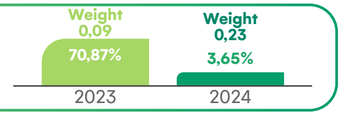


Hazardous Waste Eliminated

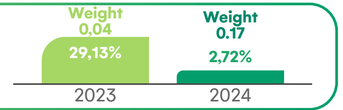
Liquids and Equipment Contaminated with Hydrocarbons
Final Disposal Method: Safety Cell



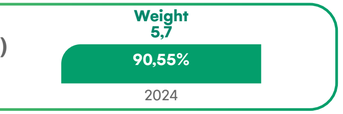
Battery waste
Final Disposal Method: Safety Cell



Toner & Printing Inks
Final Disposal Method: Safety Cell



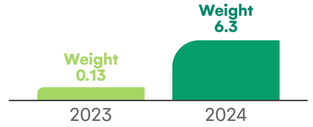
Construction and demolition waste (CDW)
Final Disposal Method: Landfill



Used oils – Lime / Dissolved Acid Laboratory Residues / Drugs / Fiberglass/ Lamp waste / Battery waste / Asbestos tiles



Total Hazardous Waste Eliminated



*The unit of measurement of the weight of waste is Tons.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Paper Consumption

As part of our commitment to reducing the environmental impact associated with the use of paper in our operations, we implemented the following actions:

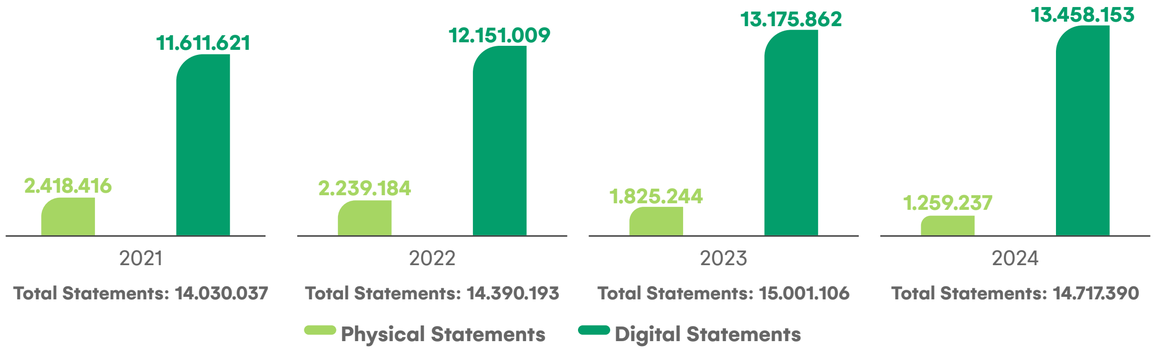
- Digitization of the stationery ordering process through the Ofix platform.
- Review and control of applications to avoid unnecessary volumes of office supplies.
- Implementation of the certified text messaging project for vehicle, payroll loans and revolving products.
- Continuity in the migration from physical statements to digital statements.
- Exclusive use of ecological paper for the supply of stationery in offices.

Thanks to these initiatives, we managed to reduce our paper consumption by 13.1% compared to 2023 (40.34 Ton) and by 37.1% compared to 2022 (55.8 Ton), contributing to the fulfillment of our eco-efficiency goal of reducing paper consumption by 25% by 2030.

The total consumption for 2024 was **35.06 tons,** distributed as follows:

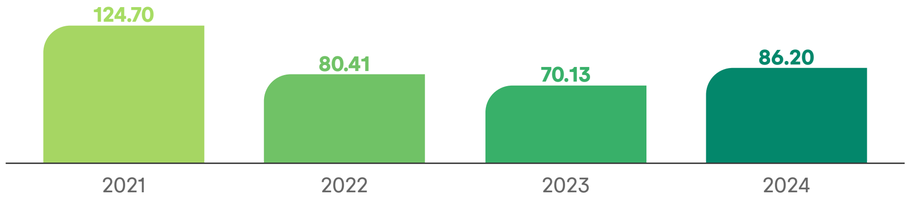
- Eco-Friendly Paper Letter: **26 Ton** (74.2%)
- Eco-Friendly Paper Legal: **1.20 Ton** (3.4%)
- Custom White Paper: **0.44 Ton** (1.3%)
- General Ecological Paper: **7.02 Ton** (20%)

In terms of the reduction in the sending of physical statements, we achieved a **decrease of 43%** compared to 2023, which means that currently **91.4%** of the statements delivered to our customers are digital.

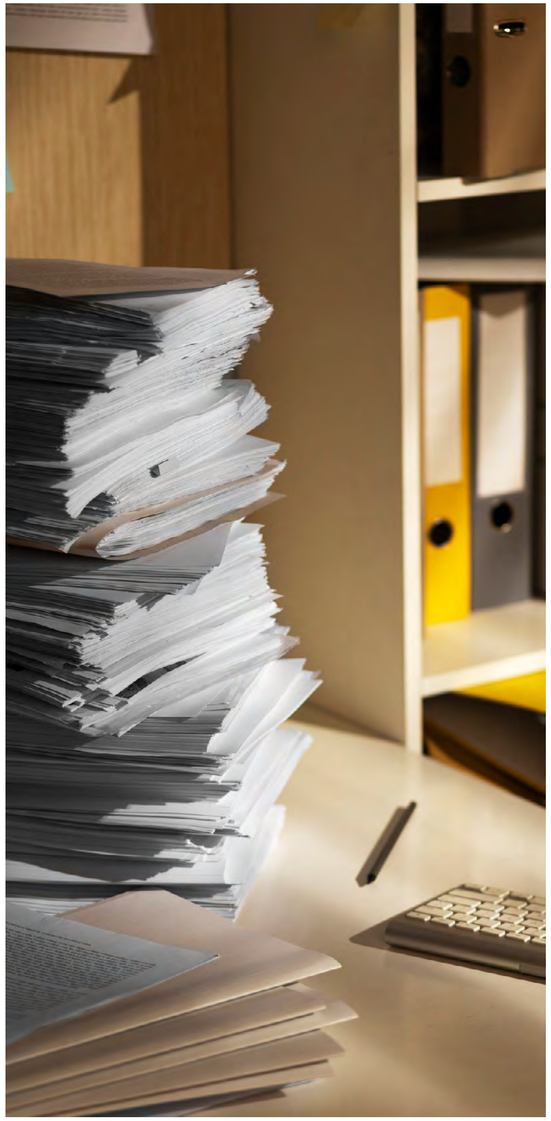


We also maintain the good practice of delivering used paper to our environmental manager for recycling. Despite the reduction in total paper consumption, the amount delivered for this purpose has increased due to the design and remodeling projects of our buildings and offices.

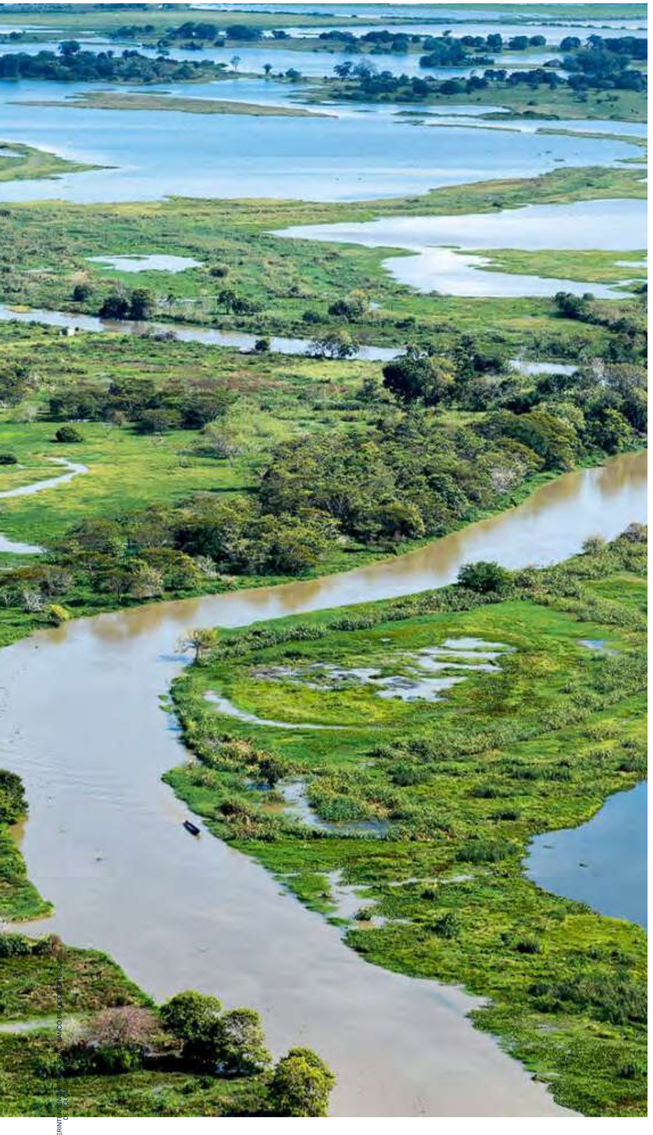
Paper delivered for recycling



In 2025, we will continue to implement the necessary measures to migrate all custom formats of the Bank from white paper to ecological paper. In addition, we will strengthen actions to reduce the printing of statements and explore new strategies to encourage customers to opt for SMS or electronic communications, as well as electronic signature of documents.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Biodiversity and Ecosystem Conservation

SDG 6.4; 13.2; 15.1

Strategies for the Protection and Restoration of Ecosystems

At Banco de Occidente we recognize ecological restoration with native species as a fundamental strategy for the conservation and recovery of natural ecosystems. Through this practice, we contribute to mitigating environmental degradation, biodiversity loss, and the effects of climate change. The use of native plants in these processes allows us to improve the functionality of local ecosystems, optimize soil quality, strengthen pollination, and expand the availability of habitats for wildlife.

Native species, being adapted to their environment, are more resilient to environmental disturbances and play a key role in the stability of ecosystems. Their incorporation into ecological restoration projects not only represents an investment in the health of the planet and the well-being of future generations, but also allows us to preserve biodiversity and guarantee the natural balance of territories.

As part of our commitment to sustainability and climate action, in 2022 we established a partnership with the World Wide Fund for Nature (WWF Colombia). Through this initiative, we seek to conserve strategic ecosystems within the National System of Protected Areas of Colombia (SINAP), promoting active restoration processes in collaboration with local communities that have decided to transform their practices and contribute to the preservation of the natural environment.

Since the beginning of the alliance we have managed to plant more than 17 thousand seedlings nationwide.

In the third year of the Community Restoration initiative in Colombia, we have made significant progress in the recovery of ecosystems and the strengthening of communities in various regions of the country. These achievements have been made possible by our commitment and continued support as a strategic ally and key partner since the inception of this collaboration in 2022.

At Banco de Occidente we have played a key role in the financing and execution of essential activities within the conservation and restoration program. Our contribution has allowed the implementation of projects in strategic protected areas, promoting not only environmental regeneration, but also the economic and social development of local communities.

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Through this alliance, we have provided financial resources, training and access to visibility platforms, thus strengthening the impact of the actions carried out.

In this third year of implementation, we have made significant progress in ecosystem restoration in four key regions within Colombia's National System of Protected Areas (SINAP). In addition, we have promoted the social appreciation of nature through citizen participation and the mobilization of our employees, reaffirming our commitment to sustainability and environmental protection.

Areas of intervention on which we have focused our efforts include:

1. **Farallones de Cali NNP.**
2. **DRMI La Playona and Loma La Caleta, in Acandí, Chocó.**
3. **High Andean Forest, buffer zone of the Chingaza National Park.**
4. **NNP Vía Parque Isla de Salamanca (VIPIS).**

Our initiatives have focused on the restoration of degraded areas through the planting of native species, the establishment of community nurseries, and the implementation of maintenance and monitoring activities, thus ensuring the sustainability of restored ecosystems.

Farallones de Cali National Natural Park

The Farallones de Cali National Natural Park is the largest continental protected area of the Pacific SIRAP, with a great diversity of climates and ecosystems that make it an important provider of goods and services for the Valle del Cauca community. About 95% of its territory maintains areas of secondary forest and, in some cases, primary forests. These natural covers represent important carbon reservoirs that contribute to the processes of mitigation and adaptation to climate change.

Within the framework of Agreement C185 between WWF Colombia and Banco de Occidente, we defined the Farallones NNP as one of the four prioritized areas to develop restoration processes. During the first two years of the initiative, we managed to plant more than 5,000 trees and, for the third year (2024–2025 period), we are making progress in planting an additional 2,500 seedlings. In addition to planting, these actions include maintenance and replanting, thus guaranteeing the impact and sustainability of ecological restoration.

This strategy allows the active participation of the owners of the land, their families and the local community, who with their knowledge of the territory identify the areas that require greater intervention and the most appropriate species for each ecosystem.

Their experience with native flora is key in the recovery of degraded landscapes and in the consolidation of more resilient ecosystems.

Currently, restoration includes fruit and forage species, strengthening sustainable conservation models through tools such as agroforestry. This methodology not only provides environmental benefits, such as attracting seed-dispersing fauna and promoting passive restoration, but also generates economic benefits for the families involved through the hiring of labor and the purchase of plant material, thus contributing to local development and the protection of these strategic ecosystems.

Indicator	Results
No. of families who received benefits from the project. (Engaged)	7 familias vinculadas en la mano de obra y el suministro de insumos.
No. of seedlings planted	5.000
No. of floristic species	60
Seedling survival rate	90%
No. of hectares restored	3.3 hectáreas
No. of reseeding	750
No. of maintenance	1 por predio
No. strengthened agreements	1
No. of jobs generated	7
No. strengthened enterprises or livelihoods	2 local nurseries. 2 properties with a tourist vocation. 1 local ESAL (with the supply of inputs).

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

We generate employment through our ecological restoration projects, benefiting local communities and contributing to improving their living conditions.

We promote sustainable local economies through ecological restoration, encouraging activities such as ecotourism and seedling production.

We improve the quality of life by recovering degraded ecosystems, favoring air and water quality, which positively impacts the health of communities.

We value and strengthen the natural and cultural heritage of communities, promoting their identity and sense of belonging.

Through planting and maintenance activities, we engage the local community, fostering their sense of responsibility for the restored land and generating small-scale employment opportunities.

DRMI La Playona and Loma La Caleta – Acandí (Chocó)

A **Regional Integrated Management District (DRMI)** is an area where landscapes and ecosystems retain their function and composition, despite modifications in their structure. These spaces allow communities to access their natural and cultural values for sustainable use, preservation, restoration, knowledge and enjoyment.

The community forest restoration project **"Recovering the mountain of the Vidal ravine"** is being developed within the **DRMI La Playona and Loma La Caleta,** in the Local Council of Furutungo, **COCOMASUR** territory. Its main focus is the recovery of the Vidal stream, a tributary of approximately 1,500 to 2,000 meters in length that begins in the **Loma La Caleta** and flows into the wetlands of **La Playona.**

This area covers **9,364 hectares,** located in the **north of Chocó,** in the northwest end of the Gulf of Urabá and southeast of the municipality of **Acandí.** It includes the **coastal area of La Playona, the mountainous corridor of Loma La Caleta and the valley on the right bank of the Tolo River.**

Within the framework of an agreement with **Banco de Occidente, WWF Colombia** established an alliance with the **Community Council of Black Communities of the Tolo River Basin and the Southern Coastal Zone (COCOMASUR)** to develop the project **"Recover the mountain of the Vidal ravine. Community restoration in the DRMI La Playona and Loma La Caleta".** This report presents the activities carried out between **2023 and 2024,** focused on improving the state of the riparian vegetation of the Vidal stream, a tributary of the La Playona wetland.

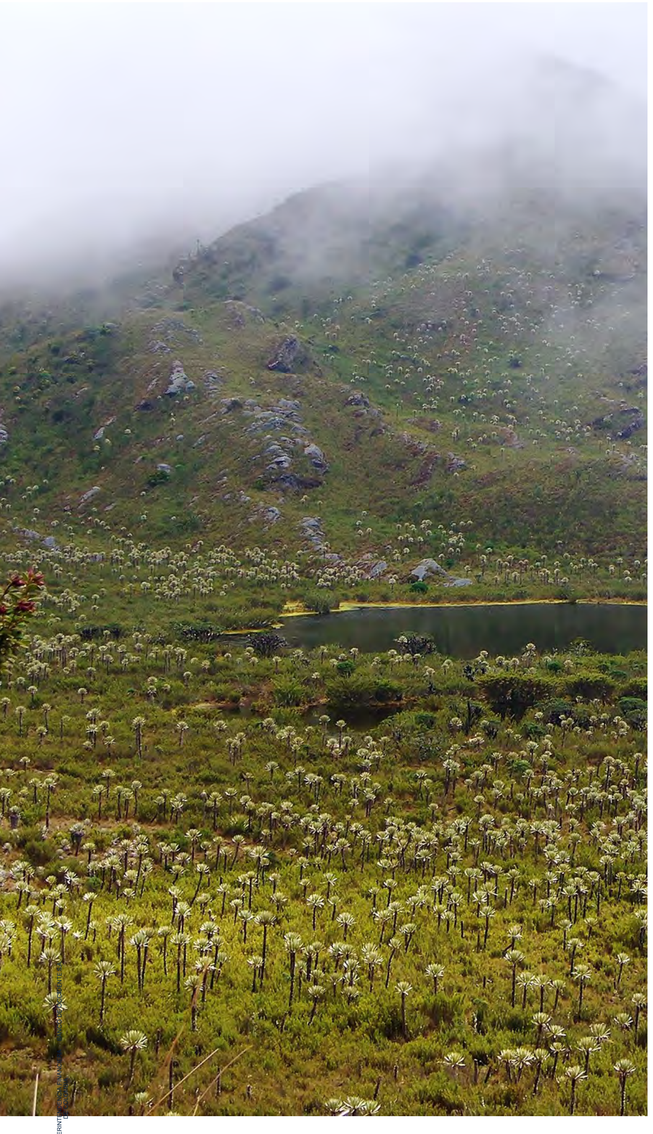
The restoration process included: consolidation of a community nursery, planting of more than 7,500 native trees and monitoring of vegetation to strengthen DRMI ecosystems.

Unlike other projects in the country, this agreement contemplated the planting of the **7,500 seedlings in a single year,** without dividing it into phases. The execution began in **2023 and concluded in 2024,** with the following progress: 2,500 seedlings in 2023 and 5,000 seedlings in 2024.

Indicator	Results
No. of families who received benefits from the project. (Engaged)	10 families engaged in the labor force and supply of inputs.
No. of seedlings planted	2.500
No. of floristic species	6
Seedling survival rate	80%
No. of hectares restored	8 hectares
No. of reseeding	150
No. of maintenance	1 per property
No. of firewalls (if applicable)	N/A
No. strengthened agreements	N/A
No. of jobs created	1



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The forest restoration of the Vidal creek has begun to generate favorable conditions for the sustainability of the La Playona wetland, a key ecosystem that is home to a great diversity of species of fauna and flora. This recovery contributes to the water balance of several rivers and streams, which are essential for the regulation of the water cycle, flood mitigation and the sustenance of essential activities such as fishing, livestock, agriculture, the use of forest products and the sustainable use of wild resources.

In addition, this restoration strengthens the availability and quality of water for nearby communities, ensuring their access to this vital resource.

High Andean Forest: buffer zone of the Chingaza NNP

According to the National Natural Parks website, the **Chingaza National Natural Park (NNP) i**s a natural and cultural treasure of central Colombia. Its mountains hold the secrets and knowledge inherited from the Muiscas and Guayupes, indigenous peoples who protected this territory, as well as from peasant communities that inhabited it until less than 40 years ago.

Today, Chingaza is a **refuge of biodiversity,** where the ecosystems of **high Andean and sub-Andean forests and moors** are home to a great wealth of fauna and flora, revealing the balance of life. Located in the **eastern Andes mountain range,** northeast of Bogota, the park extends through 11 municipalities: **seven in Cundinamarca** (Fomeque, Choachi, La Calera, Guasca, Junín, Gachalá and Medina) and **four in Meta** (San Juanito, El Calvario, Restrepo and Cumaral).

In our commitment to conservation, the **Chingaza NNP Management Plan** establishes two key objectives, which guide us in the protection of the area and its ecological connectivity with the region:

1. **Guarantee the continuity of the Andean–Orinoco ecosystems,** protecting the habitat of fauna and flora and ensuring the supply of their ecosystem services.
2. **Improve the ecological connectivity of the park's water sources,** ensuring their role in the provision, regulation and maintenance of environmental services.

To advance these ecological restoration processes, in 2022 we established a Collaboration Agreement between Grupo Conserva and WWF, with the aim of strengthening the regeneration of the high Andean forest in the park's buffer zone. As part of this agreement, we acquired, planted and maintained 2,500 seedlings of native species, planted in the Mundo Nuevo sector and cared for two years.

Given the climate and biophysical characteristics of the high Andean forest, we carry out the restoration with carefully selected native species. The seeds used in the production of the plant material came from field collection, carried out by the nursery group of Chingaza, thus ensuring their adaptation and resilience in the ecosystem.

Indicator	Results
No. of families who received benefits from the project.	11 (9 families with seedlings and 2 for inputs)
No. of seedlings planted	5.000
No. of floristic species	9
Seedling survival rate	92%
No. of hectares restored	2.3 hectares
No. of reseeding	250
No. of maintenance	2
No. strengthened agreements	12
No. of jobs created	3
No. strengthened enterprises or livelihoods	1

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NNP Via Parque Isla Salamanca

The **Via Parque Isla Salamanca (VIPIS)** is a **Protected Area** of the National Natural Parks System of Colombia, declared in 1964 with a strict conservation approach. It is located in the **Ciénaga Grande de Santa Marta Lagoon Complex,** in the department of **Magdalena,** within the jurisdiction of **Sitionuevo and Pueblo Viejo,** being one of the most important natural treasures of the Caribbean region.

This **protected territory** covers approximately **56,200 hectares,** with a diversity of ecosystems including **mangroves, wetlands, forests and beaches.** Its ecological value lies in its role as a refuge for a wide variety of species, including **migratory birds, fish, mammals and reptiles.**

Given its biological importance and the diversity of habitats it hosts, VIPIS has received multiple international recognitions. It has been designated as an **Area of Importance for the Conservation of Birds (AICA)** and, together with the **Fauna and Flora Sanctuary of the Ciénaga Grande de Santa Marta,** was declared in **1998 as a Ramsar Site** and in **2000 as a Biosphere Reserve by UNESCO.**

For the period **2024–2025,** we are developing the third phase of the restoration project in VIPIS, under the agreement **"Restoration Process Year 3: Banco de Occidente — Protected Area Via Parque Isla Salamanca"**, in alliance with the **Association of Users of the Clarín Channel.** Through this agreement, we continue with the **planting of 2,500 seedlings** in the park, ensuring the recovery of the mangrove ecosystem.

VIPIS' mangroves represent **21% of its total extension,** made up of **Rhizophora mangle** (red mangrove), **Avicennia germinans** (salted mangrove), **Laguncularia racemosa** (yellow mangrove) and **Conocarpus erectus** (Zaragoza mangrove). However, over the decades, these ecosystems have faced multiple threats, such as **deforestation, blocked streams, and increased salinity,** leading to the loss of **56% of the original mangrove cover.**



Our restoration work has a direct impact on the recovery of these ecosystems. **The success of the process depends on ensuring the proper establishment of the planted trees and the restoration of water flow through the rehabilitated canals,** which allows salinity levels to be controlled and mangrove regeneration to be encouraged.

In addition to the environmental benefits, this restoration project has generated positive impacts on nearby communities:

- **Strengthening community work:** restoration has promoted collaboration between the community, organizations and environmental authorities, generating a sense of shared responsibility in the protection of the ecosystem.
- **Boosting the local economy:** we have generated employment in planting and maintenance activities, in addition to promoting opportunities in ecotourism.
- **Protection against climate change:** Mangrove recovery strengthens the resilience of communities by mitigating the effects of extreme weather events and protecting biodiversity.

This joint effort allows us to advance in the recovery and conservation of VIPIS, ensuring that this valuable ecosystem continues to provide its environmental services to the region and future generations.

Indicator	Results
No. of families who received benefits from the project	Year 1: 18 Year 2: 105 members of the community participating in this agreement, an additional 90 people through environmental education spaces
No. of seedlings planted	5.000
No. of floristic species year 1	3
No. of floristic species year 2	2
Seedling survival rate	80%
No. of hectares restored	4 hectares
No. of reseeding	1
No. of maintenance	2
No. of firewalls (if applicable)	N/A
No. strengthened agreements	1
No. of jobs created	202
Fauna positively impacted in the process	10 species of birds and 2 species of reptiles

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Blue Planet National Ecology Award

SDG 6.3; 17.5; 13.2

At Banco de Occidente, we created the **Blue Planet National Ecology Award: Water, Principle of Life** with the purpose of recognizing and exalting projects, programs and actions that contribute to the protection, conservation and recovery of water and the environment, as well as to the promotion of sustainable practices. For more than 30 years, we have been a benchmark in the private sector as promoters of the care of water and biodiversity.

We have been granting this recognition since 1993, and in October 2024 we proudly celebrated the 16th edition. This award is held every two years, consolidating itself as a representative event in terms of environmental sustainability. Throughout its history, **we have evaluated more than 3,600 projects,** reaffirming our commitment to sustainable development.

CCategories and selection process:

In the 2024 edition, we worked together with the World Wide Fund for Nature (WWF), an expert in environmental conservation and biodiversity, to redefine the award categories in alignment with our organizational strategy and our purpose of making the development of people, business growth and the transformation of the country a reality.

The categories defined were:

- Large and medium-sized companies
- Entrepreneurship and small businesses
- Local foundations, NGOs and community organizations
- Academia (schools, research centers, innovation hubs)

In addition, we structured the award around four key themes:

Conservation and restoration around water resources:

- Watershed conservation and recovery
- Hydrometeorological risk management
- Ecosystem restoration

Sustainable use of water resources:

- Sustainable agriculture
- Saving and maximizing water resources

Innovation:

- New technologies for waste use
- Development and implementation of conservation technology
- Technological reconversion for conservation

Environmental education

- Dissemination of knowledge in formal and informal spaces
- Promotion of sustainable consumption habits
- Development of conservation education tools



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

The selection process began with an open call on our website "Blue Planet Community", where applicants registered their projects, detailing their contribution to nature and the community, their potential for replicability, sustainability and continuity of results, as well as their focus on mitigation and adaptation to climate change.

The projects were evaluated by a jury of experts in sustainability, conservation, and environmental development, including:

María Emilia Correa Pérez — Co-founder of Sistema B, with more than 30 years of experience in sustainability.

Eduardo Antonio Guerrero Forero — Biologist and Master of Science, with more than 20 years in environmental management projects.

Ángel María Guarnizo Vásquez — Sociologist and environmental manager with experience in publications and conservation programs.

Nicolás Pombo — Civil Engineer and Master of Environmental Engineering, with specializations in environmental protection.

Carlos Mauricio Herrera — Director of WWF Colombia, with extensive experience in conservation and environmental governance.

Gustavo Wilches Chaux — Professor, researcher and writer on social sciences and the environment.

Winning Projects and Prizes by Category

Categorya	Winner	Amount
Top-tier local foundations — NGOs and community organizations	Cruz Roja Seccional Atlántico	$60.000.000
	Cooperativa de Beneficiarios de Reforma Agraria Zona Balsillas	$30.000.000
	Fundación Rocamadre	$18.000.000
Entrepreneurship and small businesses	Blue Carbon Reserve SAS BIC	$40.000.000
	Distriamazon SAS BIC	$20.000.000
	Fiber Green / America Trading Company SAS	$15.000.000
Large and medium-sized companies	Bavaria & CIA S.CA	$30.000.000
	Inversiones el Paraíso Parque Cementerio SAS	$20.000.000
	Puerta de Oro SAS	$5.000.000
	Agropecuaria Aliar S.A	$5.000.000
Academia: schools, research centers, innovation hub	Fundación Universitaria los Libertadores	$20.000.000
	Institución Educativa Municipal Montessori Sede San Francisco	$15.000.000
	Institución Educativa Santa Librada	$5.000.000
		$5.000.000
Total		**$288.000.000**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Non-monetary resources for winners

In addition to financial recognition, we provide winners with visibility and dissemination of their initiatives to amplify their impact:

- Publication on the website of the Blue Planet Community, where we highlight the winning projects and their contribution to water conservation and the environment.
- Dissemination on social media, allowing more people and organizations to know about their work and be inspired by their actions.

From the Sustainability Management, together with the Brand and Relationship area, we lead the media strategy, the dissemination of content and the execution of the awards, guaranteeing its positioning and growth in each edition.

In the 16th edition of the award, we received **237 applications,** demonstrating the commitment of various actors to sustainability and the conservation of water resources.

House Natour: Connecting with biodiversity

As part of our call campaign for the 2024 edition, we launched the House Natour series, a project that allowed us to explore the natural wonders of our country, connecting with our biodiversity and learning about the importance of its preservation from the vision and history of different species.

The series has five chapters, inspired by iconic species of our ecosystem:

- **Turtle**
- **Macaw**
- **Crab**
- **Flamingo**
- **Monkey**

You can enjoy the full series by clicking here.

We will continue to promote initiatives that contribute to the protection of water and the environment, reaffirming our commitment to sustainable development and the construction of a better future for all.

By 2025 we have the challenge of continuing to consolidate our Blue Planet Community as a meeting point and business reference in the face of environmental commitment, facilitating the connection between entities from different sectors, making emerging projects and initiatives visible and promoting education around the conservation of biodiversity in our country.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A.

Empowering
People and Communities



Great Place To Work.
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AGO 2024-AGO 2025
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Empowering People and Communities

SDG 8.3; 10.2

At Banco de Occidente, **we believe that the development of our talent and the impact on communities are essential to achieve our strategic objectives and consolidate ourselves as a benchmark in sustainability.** Our purpose is to generate value for our customers, employees and society.

Through an organizational culture based on equity, well-being, and professional growth, we strengthen our commitment to talent development and the creation of opportunities. Likewise, our relationship with communities is based on financial inclusion, education and the promotion of initiatives that generate a positive and sustainable impact.

This chapter details our actions in **human capital, talent well-being, diversity, equity and inclusion, human rights, occupational health and safety, and commitment to communities and customers,** pillars that allow us to advance our vision of being an increasingly sustainable and innovative bank.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Human Capital and Talent Management

SDG 8.5
I GRI 404-2; 404-3 I

Wellbeing and Motivation: Taking Care of Our People

At Banco de Occidente, we recognize that the well-being of our employees is key to their personal and professional development, as well as to the Bank's success. For this reason, we implement initiatives that promote physical, mental and emotional health, creating a work environment where each person can reach their full potential.

Our programs are designed to positively impact not only employees, but also their families, ensuring a work-life balance. Through well-being strategies, we foster a culture of motivation, commitment and high performance, contributing to an enriching and sustainable work experience.

BdeO Mentoring Program:

This program aims to accompany and promote the personal and professional development of Banco de Occidente employees, maximizing their skills and competencies within the organization. Through this program, key competencies such as leadership, communication skills, time management, innovation, result orientation, and attention to detail are developed. This positively impacts the performance of employees, which contributes to their personal and professional growth, and consequently, improves the overall results of the organization. During the period evaluated, 2.49% of our staff, equivalent to 175 employees, participated in the program, with an investment of **$41,007,837.**









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Advanced High Performance Commercial Program – The Master KAM:

This program is designed to enhance the high performance of commercial leaders and teams in the Business and Corporate segments, through a practical and bottom-up training process, which contributes to the increase of productivity and commercial effectiveness. Some of the business impacts translate into the consolidation of commercial forces as a competitive advantage in the market, the assurance of the sustainability of commercial results, aligned with the Commercial Action Model and the increase in effectiveness in commercial objectives, improving relationships, advice and service. The initiative impacted 2.0% of the workforce (143 employees) with an investment of **$341,747,060,** including training, materials and event logistics.



Continuous Training Programs in partnership with Camacoes and Britcham:

This continuous training program offers three key training actions, focused on improving the work skills of employees in critical areas such as: internal customer experience, disruptive thinking, and innovative strategies to retain talent. In addition, the trainings positively impact the personal and professional development of our employees, improving performance in their current roles and contributing to organizational success. **Through a tender with SENA, we managed to train 5.2% of our workforce (368 employees) without generating additional costs.**



The Leader's Path – Team Building VP People:

This leadership process is aimed at Area Managers, with the purpose of strengthening their self-leadership, team management and people management skills, which contributes to the achievement of business results and adaptation to change. Some of the business benefits translate into improved effective decision-making, strengthening leaders' abilities to make strategic decisions, increasing team cohesion and organizational culture, and improving communication and collaboration between teams, contributing to a more harmonious and efficient work environment. During 2024, 25 employees participated in this initiative, representing 0.35% of our workforce, with an investment of **$33,200,000.**









VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

During 2024, Banco de Occidente promoted several initiatives that reflect our commitment to the professional and personal development of our employees, always aligned with our organizational values and strategic objectives. In this sense, we have focused on strengthening the key competencies within our organization, ensuring that each team member has the necessary tools to face the challenges of the work environment and continue to generate a positive impact on the community and the environment.

Training and Skills Development Programs

Over the course of the year, we have implemented a series of training programs, both face-to-face and virtual, to continue the professional evolution of our employees. Through our corporate university, "La U", we have provided access to a wide and diverse academic offer, with courses oriented to leadership skills, business management, effective communication, and more.

One of the most outstanding programs has been the mentoring program, where we achieved 121% of the goal set for 2024. With this, we managed to certify 121 mentors who will accompany our employees in their personal and professional development process. This success not only demonstrates our ability to consolidate key initiatives, but also the high participation of our employees in this type of program, which reflects their commitment to their own growth and that of the organization.

Leadership Development

The consolidation of a robust leadership structure has been another of our priorities. We launched the New Leaders Academy, in which 49 employees participated and accessed specialized training in transformational leadership, decision-making, and team management. This effort is aligned with our long-term vision of consolidating the leadership program for all levels within the organization.

Our focus on leaders also extended to the sales force, a fundamental pillar for the success of the entity. We implemented training programs focused on commercial management, negotiation, and customer orientation, which allowed us to improve both productivity and customer satisfaction and loyalty. Thanks to these initiatives, we managed to increase commercial effectiveness and strengthen the dynamics of commercial teams in the People and Companies segments.

Goals and Results

In terms of goals, we managed to exceed our expectations by meeting 121% of the goal set for the 2024 mentoring program. In terms of the training of our sales force, we not only improved commercial results, but also consolidated the foundations of a future training plan for the Government and SME segments. Looking ahead to 2025, our goal is to carry out at least 150 mentoring sessions during the year, consolidating this program as an essential tool in the development of our employees.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Organizational Culture and Well-Being

In addition to the development of technical and leadership skills, we have maintained a constant focus on the well-being of our employees. Through programs such as "Health Week", recreational and cultural activities, and alliances with sports institutions; we continue to promote an organizational culture that favors work-life balance, fostering healthy lifestyles and a positive environment for all.

Looking to the Future

Our commitment to sustainability and human talent management will continue to evolve. In 2025, we intend to continue consolidating our training programs, strengthening the competencies of our employees, and ensuring that all levels of leadership are aligned with the strategic needs of the organization.



Performance Appraisal Process 2024

The performance appraisal process that we manage at Banco de Occidente is based on management by objectives, which allows us to evaluate individual and organizational performance aligned with our strategic goals. This process is carried out through the Success Factors module, a tool that we provide to our employees to carry out an objective and efficient evaluation. Throughout this process, our employees have the opportunity to set goals that contribute to the success of the organization, and we work with them to ensure that each goal is aligned with the bank's priorities.

It is relevant to mention that the closing stage of the performance assessment ends at the end of the first quarter of the year, so in this report we refer to the performance of the year 2023.

During the year, the Bank's employees participated in various stages of the performance appraisal process, including: planning, initial meeting, valuation management, validation by the Human Talent area, and formalization. Each of these stages has a specific purpose, starting with the agreement of the objectives and ending with the definition of the individual results.

As a Bank, we are committed to accompanying our employees in each of these stages, ensuring compliance with the established deadlines. At the end of the process, we will obtain the individual results of the evaluated employees, which will be used as a strategic input in the management processes led by the Vice Presidency of Human and Administrative Talent, contributing to the strengthening of organizational development.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FILIGRANA

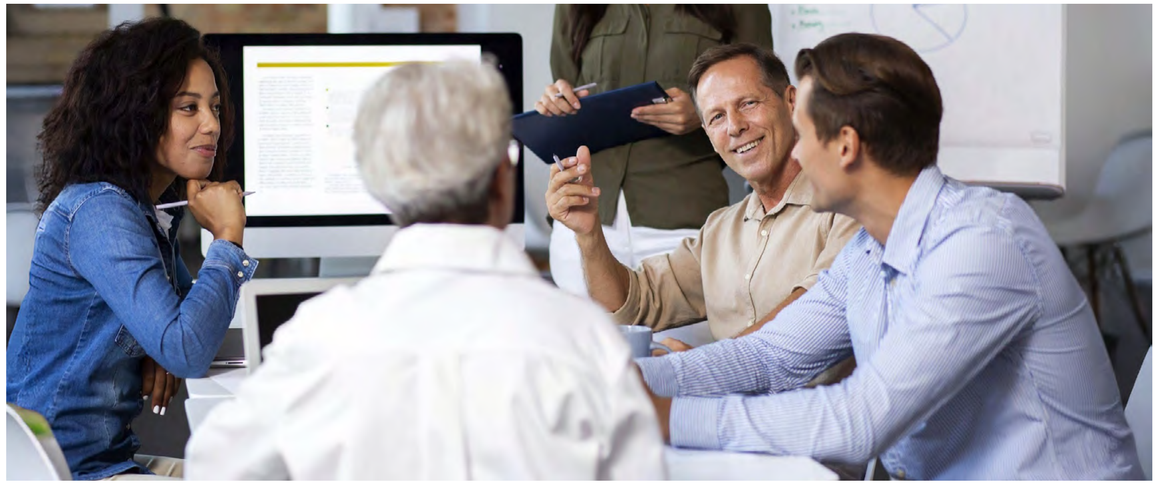
Performance Appraisal Management 2024

During 2024, Banco de Occidente led two key moments in the performance appraisal process, designing specific strategies for each stage, adapted to the characteristics and needs of our employees.

In the first semester, we focused on the promotion and execution of the first phase of the process, which includes planning and the initial meeting. Through internal communications, such as emails, and open and voluntary live events, we provide detailed guidance and advice on this stage.

The planning phase is fundamental, as it allows our employees, in common agreement with their leaders, to define the objectives for the current year, establishing clear goals and assigning specific weights. Once the objectives were agreed, we held the initial meeting, a key instance of interaction between leader and employees, where our employees were able to identify strengths and areas of opportunity related to the fulfillment of the agreed objectives.

After the deadlines for the first phase, we focused on employees who joined after the established deadline, offering them personalized sessions to ensure that they understood the proper use of the performance management tool. This supplement was complemented with materials such as instructions, videos and emails, facilitating their effective integration into the process.



In the last quarter of the year, we began the deployment of strategies for the closure of the performance appraisal process. This stage covers management and assessment, key moments in which the strengths and opportunities of each employee are analyzed, always in line with the objectives set. The events led in this phase aimed to offer tools and methodologies that would guarantee objectivity when defining final grades and evaluating competencies.

In addition, **at Banco de Occidente we promote the evaluation of team performance.** We know that collaborative work is essential to achieving organizational goals, so we evaluate not only individual performance, but also the effectiveness and impact of teams. This approach allows us to identify strengths and areas of opportunity within work teams, improving cohesion and collective performance. Team assessments encourage collaboration, ensuring that each member is aligned with the bank's mission and vision.

In 2024, we also incorporated **agile conversations** as part of the performance appraisal process. These conversations focus on **continuous feedback,** allowing employees and leaders to maintain a constant dialogue about the progress of the objectives, the challenges they face and the opportunities for improvement. **Agile conversations** encourage a proactive and flexible approach, adapting quickly to changes and needs that may arise throughout the year. These conversations allow to adjust objectives in real time and ensure that the performance appraisal process is always aligned with the expected results.

Impacts Generated

One of the most relevant aspects of the performance appraisal process is the alignment of functional objectives with key strategic elements such as the Balance Scorecard (BSC). This alignment allowed the organization to identify areas of intervention based on the data obtained from the comparison between the results of the performance appraisal and the BSC indicators.

At Banco de Occidente, we have a 90° performance appraisal system, which evaluates main elements: organizational objectives, functional objectives and competencies. Each of these elements has a specific weight assigned by the Human Development Management, with a total of 100% in the assessment form. In addition, there is a fourth element, called the development objective, whose weight is 0%, but it is mandatory within the process; this objective is designed to encourage, individually, the creation of goals focused on the technical or behavioral development of our employees.

Finally, in 2023, we implemented the 360° assessment tool as a pilot for the agile scaling team, whose purpose was to measure the agile mindset of the cells that make up the team. This exercise allowed us to obtain a partial measurement of the expected behaviors to perform in their roles and their impact within their work cell.

Achievements:

- We achieved 94% compliance with performance evaluations.
- We increased attendance at live events by 233%.
- The process encompassed both individual and team evaluations, with a focus on management by objectives.
- The evaluations were effectively carried out on a quarterly and semi-annual basis.

Employees Wellness and Benefits Programs

I GRI 401-2; 401-3; BdO-9 I

At Banco de Occidente, we understand that the health and well-being of our employees are fundamental to organizational success. We are committed to creating an environment that promotes satisfaction, productivity and retention, offering programs and benefits that allow our employees to balance their work responsibilities with their personal needs. This includes flexible work arrangements, paid parental and care leave, as well as supportive spaces such as breastfeeding rooms. These initiatives not only strengthen the morale of our employees but also contribute to the reduction of absenteeism and turnover, favoring the attraction and retention of the best talent. As a result, we managed to improve our financial and non-financial performance indicators, driving sustainable growth and a more inclusive and balanced work environment for all.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



Extralegal bonus

Since 2024, **we have changed the frequency of payments from semi-annual to quarterly, which improves the cash flow of our employees** while maintaining the same settlement conditions.

No. Beneficiaries	Amount Invested
6.307	$61.072.387.397

Vacation bonus

We grant it to employees with an indefinite contract from the third year of vacation time accrued.

No. Beneficiaries	Amount Invested
3.495	$17.403.084.329

Seniority Bonus Convention Members

This benefit is granted to employees with an indefinite contract, and is effective every 5 continuous years in the organization. Their settlement is included in the payroll for the period in which the condition is met..

No. Beneficiaries	Amount Invested
358	$1.418.729.574

Seniority bonus Non-Convention Members

This benefit is granted to employees with an indefinite contract, and is effective every 5 continuous years in the organization. The settlement is made through a Voluntary Pension Fund managed by Porvenir, on the first working day of the month following the fulfillment of the condition.

No. Beneficiaries	Amount Invested
551	$4.701.104.943

Other benefits and extralegal programs for the workforce

- This pension retirement bonus benefit is granted to employees with an indefinite contract who meet the pension requirements. From 2024, it is settled through Porvenir.
- This variable compensation benefit is paid quarterly and is included in the payroll of the employees of the vehicle sales force that meets the estimated budgets in their role.
- This vehicle bonus benefit is paid quarterly and is included in the payroll of the employees of the vehicle sales force that meets the estimated budgets in their role.

No. Beneficiaries	Amount Invested
81	$685.000.000
No. Beneficiaries 1.324	Amount Invested $13.028.462.269
No. Beneficiaries 183	Amount Invested $3.012.459.572

Impacts generated:

At Banco de Occidente we have always been concerned about the well-being of our employees. For this reason, we have implemented extralegal benefits such as educational, ophthalmological and deed aids, which benefit our employees with permanent contracts. In addition, in 2024, we implemented the fractionation of extralegal bonuses for these employees, going from 2 to 4 payments per year. Although the settlement conditions were maintained, this measure generated a positive impact for employees, by providing:

- Higher cash flow.
- Opportunity to create savings through the Sight Savings Fund.
- Extra payments to loans from the Bank's employees fund and/or portfolio.
- The possibility of buying Christmas gifts from September.

With the aim of strengthening the well-being and quality of life of our employees and their families, the bank offers a series of benefits designed to support both personal and family development. Below, we present a summary of the most relevant benefits and activities provided to our employees, promoting a work environment that favors work-life balance.

At Banco de Occidente, we promote a work environment that prioritizes the comprehensive well-being of our employees. We offer a variety of benefits including flexible work schedules, remote work options, and the possibility of part-time jobs, adapting to the personal needs of our team. We promote physical and mental health through initiatives such as sports activities, wellness programs, and events such as ecological walks, marathons, and sports tournaments. In addition, we have paid parental leave policies that include 18 weeks for the primary caregiver and 2 weeks for the non-primary caregiver. We also provide breastfeeding facilities, ensuring that our employees can balance their family responsibilities with their professional development. All of these benefits reflect our commitment to creating a flexible, inclusive, and healthy work environment for all.

> At Banco de Occidente, we promote a **work environment that prioritizes the comprehensive well-being** of our employees.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Family and Personal Life Benefits



Family Day:

One day off is granted per semester so that employees can spend time with their families. This benefit seeks to strengthen family ties and promote a more cohesive work environment. Although there is no exact measurement of usage, leaders are encouraged to support their teams in taking advantage of this day.





Maternity Leave:

2 paid days are granted in addition to the maternity leave established by law. This contributes to the improvement in employees satisfaction and retention, supporting work-life balance.

Paternity Leave:

Similarly, **2 paid days are granted in addition to the paternity leave established by law,** encouraging active participation of fathers in the first days of their children's lives.





Bereavement leave:

In the event of the death of a close relative, **additional paid days are granted according to the relationship (first degree of consanguinity: 1 additional day; second degree: leave established by law).** This benefit seeks to provide emotional support and allow adequate time for mourning.

Birthday afternoon:

Each employees can take a paid half working day on their birthday, choosing between morning or afternoon. This benefit promotes the well-being of employees, allowing them to enjoy personal time on a meaningful date.



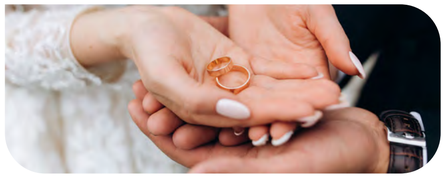
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Social Benefits and Economic Support



Marriage leave:

5 working days of leave are granted in case of marriage or common–law union, supporting employees at key moments in their lives.





Calamity leave:

Paid days are granted in situations of family calamity, adapting to the needs of the employees according to the case.

Educational aid:

Grants are granted for technical, technological and university studies, both for employees and for children of employees. In 2024, **$1,488,936,884** was invested to benefit **2,342 employees.**





Other Assistance:

Additional assistance includes support for ophthalmological expenses, birth, adoption, marriage, death of relatives, and deed. In total, **$539,877,716** was invested for **1,030 employees.**

Life insurance:

A life and personal accident policy is offered to indemnify employees and their beneficiaries in the event of death, benefiting **6,794 employees** with an investment of **$1,800,112,618.**





Medical insurance:

Medical insurance is provided that covers surpluses of the EPS and prepaid medical insurance for the employees and his family, benefiting **3,651 employees** with an investment of **$2,507,321,499.**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Benefits for Wellness and Quality of Life



Housing credit:

Mortgage loans are granted for the acquisition of new or used housing, both for convention and non-convention member employees. In 2024, **200 loans were granted** or a total of **$21,812,175,979.**





Tournaments and recreational activities:

The Bank organizes sports and recreational events for employees, such as bowling tournaments, beach volleyball, marathons, and ecological walks. They were carried out in various cities and a total of **$2,073,684,516** was invested in these activities, reaching the participation of **4,702 employees.**

Ecological volunteering:

Volunteering activities were organized with WWF to generate a positive environmental impact, such as planting trees. **735 employees** participated with an investment of **$137,059,270.**



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A.

Variable Compensation

Our Variable Compensation Model is designed to drive high performance in commercial areas. Its purpose is to establish a system that reinforces the measurement culture and encourages progress in the execution of the strategy, ensuring the fulfillment of commercial objectives.

To achieve this, we have an evaluation scheme based on performance indicators of the sales team, which represents 19% of our total employees. Compensation (percentage in addition to the base salary earned for meeting goals) is managed on a monthly basis for Bar Advisors, Vehicle Executives, and Finance Center Advisors, while for Division Managers, Relationship Managers, Coordinators, Executives, Investment Managers, and Directors with business functions in the Vice Presidency of Businesses, Vice-Presidency of Personal Banking and Treasury Management, it is applied quarterly.

In 2024, **the results reflect the effectiveness of the model and its impact** on meeting our strategic goals.

Title	2022			2023			2024		
	Coverage	Budgeted Goal	Goal achieved	Coverage	Budgeted Goal	Goal achieved	Coverage	Budgeted Goal	Goal achieved
VP Business	436	80%	82%	417	80%	57%	432	80%	35%
VP Perso-nal Banking	910	80%	58%	803	80%	43%	841	80%	39%
Treasury	44	80%	93%	44	80%	91%	45	80%	91%
Sumernumeraries	38	80%	84%	35	100%	42%	68	80%	54%

- **VP Business:** Segment VP Zonal Managers Commercial Directors Commercial Managers Commercial Executives.
- **VP Personal Banking:** Commercial Division Managers Zonal Managers Commercial Directors Coordinators Commercial Managers Commercial Executives Service Advisors.
- **Treasury:** Division Manager Assistant Table Managers Treasury Directors Investment Managers.
- **Supernumeraries:** VP Business VP Personal Banking: Commercial Managers Commercial Executives.

Talent Development and Continuous Learning

SDG 4.3; 10
I GRI 404-1 I

In 2024, at Banco de Occidente, we focus on strengthening our organizational development through the launch and consolidation of our Corporate University **"La U"**. This platform has been key to optimizing our educational offer, allowing more efficient training.

Throughout the year, **$3,284,311,600** was invested in training and education programs. In total, **283,106** hours of training were given, which gave us an average of **37.53 h**ours of training per employees. In addition, the average amount invested in training and education programs per employees was **$467,850**, which reflects our constant investment in the development of each of our employees.

The launch of "La U" was a strategic event that was held both virtually, to guarantee accessibility to all our employees, and in person, through a tour of the main cities of the country, reaching more than 5,000 employees. This massive action generated a significant impact, promoting participation and engagement with the platform.

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In addition, we implemented the "Blue Hour" strategy, which consists of granting one working hour per week for specific training related to the position. This initiative also allowed access to the platform to 2 family members for each employees, expanding the scope of our development program.

In terms of results, in July 2024 we launched the Responsible Personal Finance course, which reached 99% participation, reflecting the commitment of our employees to their continuous training. Likewise, in November, our Corporate University was recognized with the Portfolio Award in Human Management, which highlights the effectiveness of our initiatives.

By 2025, our focus will be to consolidate "The U" as an essential tool for organizational development, moving from the launch stage to the stabilization stage. We will ensure that the impact of the training is measurable and of high value for the organization, and we will focus on the implementation of tools that allow us to evaluate not only the reaction of employees, but also how the skills acquired directly impact their roles and organizational results. This evaluation will demonstrate the return on investment in training and strengthen alignment with the Bank's strategic objectives.

Management Level	Men 18–30 years		Women 18–30 years		Men 30–50 years		Women 30–50 years		Men >50 years		Women >50 years	
	Hours	Average	Hours	Average	Hours	Average	Hours	Average	Hours	Average	Hours	Average
Senior Management	0	0	0	0	169	56.33	0	0	285	31.67	68	68.00
Middle Management	0	0	0	0	820	45.57	222	36.92	736	23.75	357	35.70
Commercial	1.483	31.55	2.416	39.60	9.838	32.90	19.184	33.71	3.653	36.46	4.249	31.95
Administrative	8.644	20.98	7.248	23.23	17.398	25.97	19.183	26.68	4.624	27.20	2.366	25.17
Operating	38.194	56.09	93.396	63.45	11.321	38.64	29.095	43.69	4.819	38.87	3.338	29.28
Total	**48.321**	**42.39**	**103.059**	**55.86**	**39.546**	**30.82**	**67.684**	**34.53**	**14.117**	**32.08**	**10.379**	**29.48**

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Hiring and Turnover

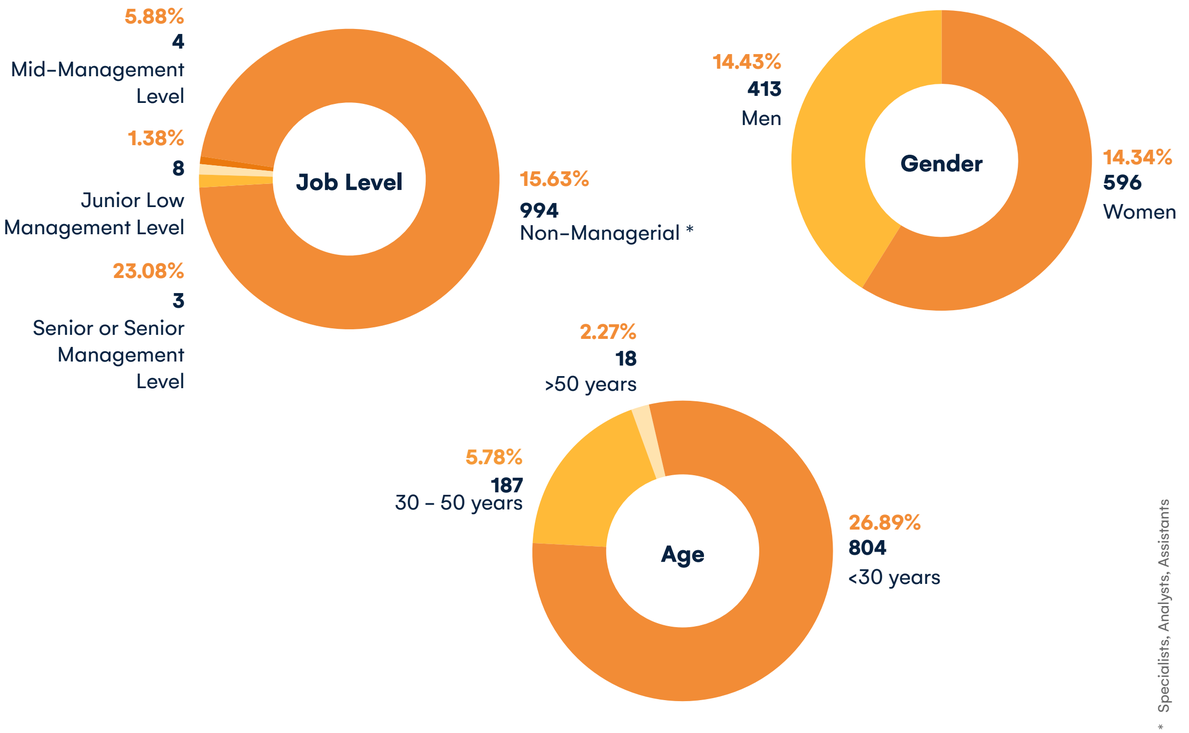
SDG 8.5
I GRI 401-1; BdO-8 I

At Banco de Occidente, we understand that hiring new employees and managing staff turnover are fundamental elements to maintain a healthy and productive work environment. Through effective selection processes, we seek to integrate the team of employees with the talent and skills necessary to achieve the strategic objectives of the organization. At the same time, we manage staff turnover proactively, to minimize the loss of knowledge and experience, promoting stability and long-term commitment.

In this context, our focus is not only on attracting the best talent, but also on creating an environment in which our employees feel motivated, valued and with opportunities for growth within the Bank. In this way, we foster a strong organizational culture that allows for the continuous evolution and success of our institution.



Number and Rates of Hire



In 2024, we consolidated our internal mobility strategy, **allowing 7 out of 10 vacancies to be filled by talent within the organization. Of the 2,151 vacancies opened during the year, 1,576 were filled by our own employees, reaching 73% of internal coverage.** This result represents a significant advance compared to 2023, when the percentage was **57.6%,** that is, an increase of more than **15 percentage points** in the promotion of internal talent.

These results reflect our commitment to the growth and career projection of our employees, strengthening their development within the organization and promoting a culture that values the retention and evolution of talent.

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Number and Turnover Rates

		Number	Rate
Age	Total employees turnover <30 years:	474	15.85%
	Voluntary employees turnover <30 years old:	353	11.81%
	Total turnover of employees between 30-50 years old:	241	7.44%
	Voluntary turnover of employees between 30-50 years old:	164	5.06%
	Total employees turnover >50 years:	69	8.71%
	Voluntary employees turnover >50 years old:	43	5.43%
Gender	Total Turnover of Women	454	10.92%
	Voluntary Turnover of Women	330	7.94%
	Total Turnover of of Men	330	11.53%
	Voluntary Turnover of Men	230	8.03%
Job Level	Rotación total Nivel Gerencial Junior Bajo	25	4.33%
	Rotación voluntaria Nivel Gerencial Junior Bajo	14	2.42%
	Rotación total Nivel Gerencial Medio	1	1.47%
	Rotación voluntaria Nivel Gerencial Medio	1	1.47%
	Rotación total Nivel Gerencial Senior o Alto	0	0.00%
	Rotación voluntaria Nivel Gerencial Senior o Alto	0	0.00%
	Rotación total Nivel no Gerencial (Especialistas, analistas, auxiliares)	758	11.92%
	Rotación voluntaria Nivel no Gerencial (Especialistas, analistas, auxiliares)	545	8.57%

Total wanted withdrawals **784**

Total unwanted withdrawals **560**

Total Rate: **11.17%**

Voluntary rate: **7.98%**



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Talent Wellbeing

SDG 8.5

At our bank, the well-being of our employees is a priority. We believe that a healthy, inclusive, and equitable work environment is key to strengthening our team's engagement and performance. For this reason, we implement strategies that promote job satisfaction, professional development and an environment based on respect and effective communication.

To guarantee comprehensive well-being management, we have tools such as **the Great Place to Work (GPTW) measurement,** which allows us to know the perception of our employees and focus on improvement actions. In addition, we have **mechanisms for collective bargaining and conflict resolution,** encouraging dialogue and the construction of agreements that benefit all parties.

We complement these initiatives with **effective service channels,** which guarantee active listening and a timely response to the needs of our talent.

Work Environment

I BdO-13 I

In our organization, the well-being of employees is a priority, and the Great Place to Work (GPTW) measurement is a key tool to evaluate and strengthen our work environment. Over the last few years, we have achieved a positive trend in the commitment, satisfaction and well-being of our team.

In 2022, our work environment index was 80.6; in 2023, it reached 87.6, and in 2024, we achieved 92.1, exceeding our goal of 88.6 for this year. In addition, 93% of employees participated in the survey in just six working days, reflecting a high level of commitment and openness to share feedback, a key factor for the continuous improvement of our working conditions.

This progress shows that our initiatives have been effective in strengthening the work environment, highlighting strategies such as the management of the organizational climate in the different teams, workshops and recreational sports activities, as well as a culture that promotes work-life balance. Open communication and recognition of the efforts of employees have also been fundamental in this progress.

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The initiatives implemented have contributed to strengthening the five key dimensions of the work environment: **credibility, pride, camaraderie, respect and equanimity.** As a result, we have obtained significant improvements in different indicators:

- **Increased productivity.**
- **Attracting highly qualified talent.**
- **Reduced staff turnover.**
- **Greater commitment and sense of pride in the teams.**
- **Greater recognition of our organizational culture.**
- **Strengthening the positioning of our collaborating brand.**
- **Reduction in absenteeism rates.**
- **Better work–life balance.**









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Job Satisfaction

(External motivation: I am satisfied with my job): One of the main indicators we measure is the **eNPS© (employee Net Promoter Score),** which evaluates how willing our employees are to recommend the organization as an excellent place to work. In **2024,** this index stood at **92.8%, very satisfactory.**

Purpose and Happiness

(Internal Motivation: *My Job Has a Clear Sense of Purpose / I Feel Happy at Work Most of the Time)*: We also measure the dimension of **pride** within the organization, assessing the sense of purpose at work through statements such as: "I feel like I make a difference here", "My work has a special meaning: it's not just a job," and "I want to work here for a long time." In **2024**, this indicator reached **94% acceptance,** reflecting a **very high rating.**

Stress and Emotional Well-Being

(I feel stressed at work most of the time): within the dimension of **respect,** we analyze aspects related to support, collaboration and care. In particular, the statement "This is a psychologically and emotionally healthy place to work" obtained **90% acceptance,** confirming the perception of a safe and positive work environment.

Wellbeing - Work Environment

	2022	2023	2024	Objetivo 2024
% employees with the highest level of engagement, satisfaction, well-being or eNPS	80.60%	87.60%	92.10%	88.60
% of employees who responded to the survey	92%	94%	93%	

Acknowledgments: Our efforts have been recognized nationally and internationally.

- **Best place to work in Colombia** category +1,500 employees, for the second consecutive year).
- **Best place to work in Colombia for women** (category +1,500 employees).
- **Best bank to work for in Latin America** (category +1,500 employees).



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Diversity, Equity, and Inclusion

SDG 8.5; 10.2

At Banco de Occidente we have a common purpose and we know that to achieve it we have a team that reflects our values and corporate identity. Respect, as the main value of our culture, is transversal to all our operations and reaffirms our commitment to the protection of human rights and the creation of diverse environments, free of discrimination, violence and harassment in the workplace. We guarantee the physical, mental and social well-being of our employees and stakeholders, in line with our Human Rights Policy, Internal Work Regulations and Code of Ethics and Conduct.

Currently, we are part of Asobancaria's Social Protocol, a voluntary agreement that promotes equity, diversity and inclusion in the Colombian financial sector. This protocol establishes good practices in four key strategies: internal culture, financial education and inclusion, value proposition and financial risk management.

Likewise, under our Human Rights Due Diligence approach, we incorporate diversity, equity and inclusion criteria in the Human Rights Policy, aligned with the United Nations Guiding Principles, as well as in the Code of Ethics and Conduct and the Internal Work Regulations. **Our 2024 was focused on:**

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Respect, as the main value of our culture, is transversal to all our operations.

Gender equity:

- Campaign #Mujeresqueinspiran to make visible the role of women in the organization and in the business sector.
- Benefit of free registration to the SME Business Community for companies led by women (350 registered).
- Podcast "Female Leadership", addressing salary challenges, participation in boards of directors and other key topics.

Diversity and inclusion:

- "Being Diverse is Natural" campaign to promote zero discrimination.
- Adjustment in the wardrobe protocol, eliminating gender guidelines.
- Modification of the scope of the marriage license to include couples in a common-law union.

Diverse and sustainable sourcing:

- Evaluation of suppliers in ESG criteria, with support plans in alliance with the Global Compact and the Chamber of Diversity.

Certifications and characterization of employees:

- Third certification as a Friendlybiz company.
- Initiation of sociodemographic characterization to strengthen People Analytics and establish support plans.
- Creation of a photographic stock with active employees to reflect our diversity.

Support for pregnant and breastfeeding mothers:

- Accompaniment in the use of breastfeeding spaces.
- Design of educational booklets and informative talks.
- Information and guidance on administrative procedures.

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In addition, with the support of the Chamber of Diversity, we carried out:

- Two forums on the ABCs of diversity and support network for LGBT people, with **560 participants.**
- Diversity and inclusion training for communications, purchasing, steering committee, customer experience, and human talent teams.
- Two courses for the bank's community: ABCs of diversity and diverse and inclusive care.

Although we do not have specific goals or processes for hiring based on diversity criteria, selection and growth within the organization is based on competencies and skills. In addition, in order to hire and/or retain people from underrepresented groups, we made an alliance with SENA, where we developed a training and work experience program for young people, achieving the involvement of 40% of the participants in the organization.

Diversity and Inclusion in Our Workforce



LGBTIQ+ population
180 (1.94%)



Afro
111 (1.20%)



Indigenous
24 (0.25%)

Diversity Indicators

I GRI 405 — 1 I

Diversity indicator	2022	2023	2024
% of women in the total workforce	59.12%	58.86%	59.22%
% of women in all management positions, including junior, middle and senior management	42.79%	42.15%	42.64%
% of women in junior management positions, i.e. at the first level of management	45.39%	44.96%	44.98%
% of women in senior management positions, i.e. at a maximum of two levels of the CEO or comparable positions	24.09%	21.79%	25.92%
% of women in managerial positions in income-generating roles	52.89%	47.69%	48.00%
% of women in STEM-related positions	34.60%	30.60%	43.44%

In order to hire and/or retain people from underrepresented groups, we made an alliance with SENA, where we developed a training and work experience program for young people, **achieving the involvement of 40% of the participants in the organization.**

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Human Rights

SDG 5.5; 8.5; 10.2; 16

At Banco de Occidente, respect for Human Rights is a fundamental principle that guides our management and allows us to generate responsible and sustainable relationships with our stakeholders. Our commitment is aligned with international standards such as the United Nations Guiding Principles on Business and Human Rights and is embodied in our Human Rights Policy, which establishes guidelines to prevent and address risks related to child labor, forced labor, human trafficking, equal pay and non-discrimination, among other key aspects.

Our Human Rights due diligence approach extends to the entire organization, including our operations, suppliers, and business partners, with the goal of proactively identifying, assessing, and mitigating risks. To this end, we carry out systematic and periodic reviews that allow us to map the main challenges in our value chain and establish concrete measures for the prevention, mitigation and remediation of negative impacts.

In recent years, we have strengthened our evaluation processes by implementing tools that allow us to measure the percentage of activities evaluated, identify specific risks, and adopt mitigation and remediation plans in our own operations, contractors, Tier 1 suppliers, and joint ventures where we have a stake. In this chapter, we detail the results of our evaluations, the actions implemented and the mechanisms with which we ensure the protection and promotion of Human Rights in all our business activities.

Our Commitment to Human Rights

At Banco de Occidente, we reaffirm our commitment to the respect and promotion of Human Rights, aligning ourselves with internationally recognized standards and regulatory frameworks. Our **Human Rights Policy** establishes clear guidelines to prevent, mitigate, remediate, and repair the risks and impacts identified in our operations, the value chain, and in relation to all our stakeholders, including the Board of Directors, shareholders, employees, suppliers, allies, customers, communities, and the environment.

Our commitment is based on international principles such as:

- Universal Declaration of Human Rights.
- International Covenant on Economic, Social and Cultural Rights.
- International Covenant on Civil and Political Rights.
- ILO Declaration of Fundamental Principles and Rights at Work.
- ILO Fundamental Conventions.
- International Convention on the Rights of the Child.
- Convention on the Rights of Persons with Disabilities.
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.
- International Convention on the Elimination of All Forms of Racial Discrimination.
- Convention on the Elimination of All Forms of Discrimination against Women.
- International Convention on the Protection of the Rights of All Migrant Employees and Members of Their Families.

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In addition, we align with:

- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- United Nations Global Compact
- Principles for the Empowerment of Women
- United Nations Principles for Responsible Investment
- United Nations Environment Programme Finance Initiative
- Sustainable Development Goals (SDGs)

We also comply with the provisions established in the Political Constitution of Colombia and, in the case of our affiliates in Panama and Barbados, we guarantee respect for the Human Rights standards applicable in those jurisdictions.

In addition, our policy integrates specific commitments that encompass respect for Human Rights in all our business activities, including critical aspects such as the prevention of child labor, forced labor, human trafficking, freedom of association, the right to collective bargaining, equal remuneration, and non-discrimination. Among these commitments we highlight:

- Act under ethical principles of **transparency, equity, legality and collaboration.**
- Reject any act that violates Human Rights, including **child and forced labor.**
- Promote **diversity, inclusion and equal opportunities** in selection, professional development and compensation processes.
- Guarantee **freedom of association and the right to collective bargaining,** respecting the provisions of the collective agreement and the right to strike.
- Require our suppliers to comply with **occupational health and safety, legal, fiscal, environmental and labor** regulations, ensuring decent work environments without discrimination.
- Provide clear, truthful and sufficient information about our products and services.
- Promote respect for and care for the environment, minimizing socio-environmental impacts and preserving people's dignity.

Due Diligence

As part of our management approach, Banco de Occidente has implemented a **structured human rights due diligence process,** aligned with the United Nations Guiding Principles on Business and Human Rights. This process allows us to **identify, assess, mitigate, and remediate** impacts on our business, operations, and supply chain.

Our Human Rights due diligence process includes the following phases:



1. **Context analysis:** We review international standards, local regulations and best practices in the field.
2. **Identification of risks and impacts:** Through consultations with our stakeholders, we map the possible risks and impacts on Human Rights within our operations and value chain.
3. **Risk and impact assessment and action plan:** We assess the identified impacts and design mitigation and remediation plans.
4. **Monitoring and follow-up:** We periodically evaluate the effectiveness of the actions implemented to ensure compliance.
5. **Communication and transparency:** We share the progress of our human rights management with stakeholders, ensuring clear and accessible communication.
6. **Review and continuous improvement:** We adapt and strengthen our due diligence process based on lessons learned and changes in the regulatory and business environment.

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In addition, we conduct **periodic human rights risk assessments,** updating our risk matrix and adjusting action plans as necessary. These assessments cover our own operations, tier **1 suppliers, and joint ventures,** and are reported with specific indicators, such as % of total **assessed in the last three years, % of total assessed where risks have been identified, and % of risk with mitigation actions taken.**

Through these actions, we reaffirm our commitment to respect Human Rights, ensuring that our operations and business relationships are developed with the highest standards of responsibility and ethics.

Identification of Groups at Risk and Impact Assessment

As part of our commitment to the protection and promotion of Human Rights, during 2024 we carried out a comprehensive assessment of risks and impacts on our operations and supply chain. This exercise, carried out in collaboration with PwC, included a study of external sources (benchmark) with the aim of identifying the main risks and effects on Human Rights within the financial sector, both nationally and internationally.

The findings were related to four main groups:

- **Employees:** Focused on ensuring fair working conditions and a safe work environment.
- **Customers:** Considering financial inclusion and the prevention of discriminatory practices.
- **Communities surrounding housing construction projects:** Evaluating possible environmental and social impacts derived from our financing.
- **Suppliers:** Ensuring that our supply chain complies with ethical standards and respect for Human Rights.

The evaluation process included consultations with various stakeholders and the analysis of primary and secondary information, which made it possible to identify 21 possible risks and negative impacts on Human Rights, classified as follows: 8 direct impacts, 8 associated risks and 5 perceived risks.

This assessment covered 100% of our operations, ensuring comprehensive coverage that allows us to effectively manage and mitigate impacts.

Mitigation and Remediation Measures

Based on the risk and impact assessment, we have established a set of preventive and corrective measures, among which the following stand out:

- Review and update of our corporate policies and guidelines with a focus on Human Rights.
- Continuous training for our employees, suppliers and other stakeholders on good practices in Human Rights.
- Strengthening of communication and complaint channels and mechanisms, ensuring accessibility and transparency.

Complaint and Grievance Mechanisms

We have several channels for the reception and management of complaints related to Human Rights:

- **Ethics Hotline:** For the reception of complaints from external audiences.
- **Work Environment Mailbox and Work Coexistence Committee:** Focused on addressing internal issues related to our employees.

As part of our action plan, we are evaluating and redesigning these mechanisms to ensure greater clarity, accessibility, and efficiency in monitoring complaints, ensuring that they are addressed in a timely and effective manner.

Category	% of total assessed in the last three years	% of total assessed where risks have been identified	% risk with mitigating measures taken
Own operations	100%	100%	0%
Tier 1 Contractors and Suppliers	100%	100%	0%

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Occupational Health and Safety

SDG 3.8; 8.8

I GRI 403-1; 403-2; 403-3; 403-4; 403-5; 403-6; 403-8; 403-9; 403-10; BdO-10; BdO-11; BdO;12 I

At Banco de Occidente, we reaffirm our commitment to the well-being of our employees through a robust Occupational Health and Safety Management System (OH&S-MS) aligned with the highest standards. Our strategy not only responds to regulatory requirements, but also seeks to generate a positive impact on the organizational culture, promoting safe, healthy and sustainable work environments.

Occupational Health and Safety Policy

At Banco de Occidente, we are committed to the safety and well-being of our employees, contractors, and anyone under our supervision. Our Occupational Health and Safety policy is applicable to all our operations and complies with relevant national and international regulations, as well as applicable voluntary standards and collective agreements.

We encourage the consultation and participation of our employees and their representatives in the identification of risks, the implementation of preventive measures and the continuous improvement of our OSH management system. To this end, we set quantifiable objectives, prioritize action plans and promote a culture of prevention in all our areas of work.

As part of our commitment to sustainability and improving organizational performance, we report our OSH progress within the framework of key indicators used in assessments such as the Dow Jones Sustainability Index (DJSI). This allows us to continuously evaluate and optimize our performance metrics, ensuring responsible management aligned with industry best practices.

Our Executive Management endorses and promotes the implementation of this policy, ensuring its integration into our corporate strategy and its alignment with our values of well-being and sustainability.

Our Occupational Health and Safety Program

At Banco de Occidente, we carry out periodic risk and hazard assessments in the field of Occupational Health and Safety (OSH) to identify and mitigate factors that may affect the well-being of our employees and contractors. We prioritize and integrate action plans with quantifiable objectives, aligned with our corporate strategy.

We have emergency prevention and response protocols, regular internal inspections and external audits under national and international standards and rules, ensuring compliance and continuous improvement of our OSH management system.

We investigate any injury, illness, or workplace incident in a structured manner to implement corrective actions. In addition, we offer OSH training to employees and third parties, promoting a culture of prevention. OSH criteria are incorporated into our contracting requirements, ensuring our partners' commitment to safety.



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Preventive strategy and approach

During 2024, we strengthened the management of the OSHMS through a preventive approach based on risk identification, the implementation of wellness programs, and the use of technology to optimize processes. Our management is focused on three fundamental pillars:

- **Risk prevention and health promotion:** We implement action plans to mitigate ergonomic, psychosocial and biological risk factors, ensuring optimal working conditions for all our employees.
- **Culture of safety and well-being:** We develop training and awareness programs aimed at promoting a culture of self-care and co-responsibility in safety and health at work.
- **Monitoring and continuous improvement:** Through key indicators and internal audits, we evaluate the performance of the system to implement improvements aligned with our sustainability strategy..

In 2024, we strengthened and expanded the coverage of the OSHMS, managing to intervene in all our offices and guaranteeing the inclusion of all employees, regardless of their work modality. In addition, we extended the scope of the system to contractors operating within our facilities and to suppliers with personnel on mission, reaffirming our commitment to safety throughout the value chain.

With these actions, we continue to consolidate a culture of prevention and well-being, ensuring that Banco de Occidente continues to be a benchmark in the protection of the health and safety of our employees and allies.

Actions Implemented

To strengthen our OSHMS, we have developed a comprehensive plan that includes the planning and definition of OSHMS policies, indicators and objectives, as well as the development of work plans for the different surveillance and prevention programs. These include psychosocial surveillance systems and prevention of musculoskeletal disorders, industrial safety and hygiene, occupational medicine and reintegration processes, emergency preparedness and response, strategic road safety plan and public risk management. In addition, we worked on the pregnant women and breastfeeding program, the communication and training plan in OSH, the strengthening of employees participation committees such as COPASST, the Coexistence Committee and the Road Safety Committee, and the program for suppliers and contractors.

Impact on Stakeholders

These actions generate positive impacts both on our employees and on the external actors who interact with our organization. Thanks to its implementation, we ensure compliance with current legal regulations and promote health and prevention of occupational diseases. We create safe and healthy work environments, facilitate timely and efficient return to work, and ensure operational continuity in case of emergencies. We also contribute to safety in the mobilization of employees, promote education and generate safe spaces for breastfeeding. We are also strengthening employees engagement channels and extending the reach of OSHMS to key contractors and suppliers to ensure safety throughout the value chain.

Hazard identification, risk assessments and incident investigation

At our bank, we manage occupational health and safety through a structured approach based on hazard identification, risk assessment and incident investigation. We implement an Occupational Health and Safety Management System (OSHMS) aligned with local regulations and international standards, guaranteeing a safe work environment for our employees.

To identify hazards, we carry out periodic inspections at the facilities, surveys of employees and analysis of working conditions, to detect potential risks. We use qualitative and quantitative risk analysis methodologies to prioritize and mitigate threats.

In terms of risk assessment, we apply the risk matrix to classify and manage hazards related to ergonomic, psychosocial, biological and physical factors. In addition, we promote operational controls

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and specific action plans to minimize exposure to occupational risks.

Regarding incident investigation, we follow a standardized protocol that includes information gathering, root cause analysis, and establishing improvement plans. An internal committee analyzes incidents and accidents at work, ensuring the application of corrective and preventive measures to prevent their recurrence.

In addition, we carry out constant training in occupational safety, promote a culture of risk reporting, and work on the continuous improvement of the OSHMS to guarantee the well-being of our employees.

Occupational Health Services

In our bank, we have a comprehensive occupational health program that contributes to the identification, prevention and minimization of occupational risks, guaranteeing the well-being of our employees. We implement a comprehensive rehabilitation program, through which we monitor and accompany employees who have health conditions that may generate prolonged disabilities (greater than 30 days) or that require restrictions or work recommendations.

In addition, we carry out periodic occupational medical examinations of the entire working population, ensuring early detection of risk factors and timely intervention. Every year, we carry out an occupational health diagnosis, analyzing the main findings of occupational assessments, which allows us to plan preventive activities and intervention strategies in the field of occupational medicine.

To ensure quality and access to these services, we work with a team of health professionals, including occupational physicians, physiotherapists, and occupational psychologists, who provide ongoing accompaniment. We also maintain strategic alliances with nationally certified providers for the provision of specialized medical services.

Employees engagement, consultation and communication

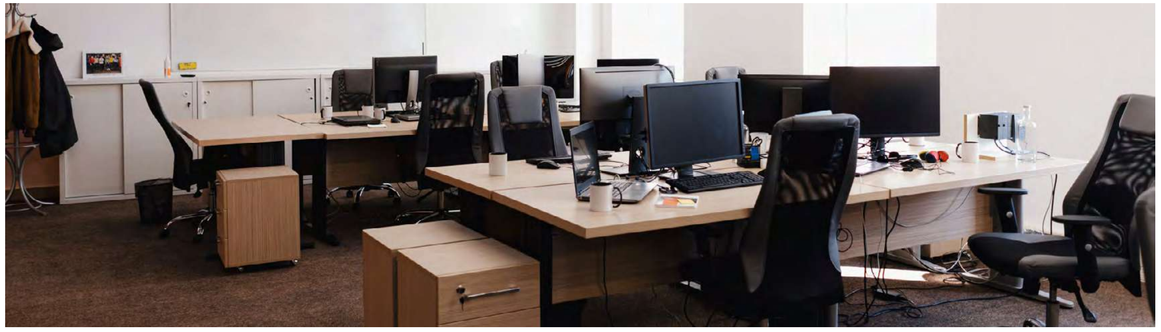
At Banco de Occidente, we guarantee the participation of our employees in the Occupational Health and Safety Management System (OSHMS) through different mechanisms of consultation, communication and decision-making.

Joint Committee on Safety and Health at Work (COPASST)	A space for participation where employees elect representatives to ensure the continuous improvement of the OSHMS. Monthly meetings and training on responsibilities and improvement actions are held.
Unsafe Conditions Reporting Channels	Through COPASST, the OSH mailbox (saludytrabajo@bancodeoccidente.com.co), safety inspections and the annual update of risk management, employees can report conditions and propose improvements.
Road Safety Committee	Focused on the prevention of traffic accidents and awareness of road safety regulations through training and work plans aimed especially at employees in commercial roles.
Emergency Operating Committee (COE)	It is in charge of socializing and coordinating the Emergency Plan, carrying out earthquake and evacuation drills in all offices nationwide.
Labor Coexistence Committee	Space where employees can report complaints related to the work environment, with follow-up and resolution of conflicts in a framework of confidentiality.
Participation in Hazard Identification and Risk Assessment	Employees actively participate in safety inspections and job analysis to identify and mitigate risks.

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Formal safety and health committees

	Key Features
COPASST — Representatives of employees and employer (8 per zone). It is carried out monthly.	Supervise the OSHMS, propose improvements and participate in accident investigations.
Emergency Operating Committee (COE) — Leaders of Administrative Resources, Human Talent, Banking Security, OSH and Operations. It is carried out according to need.	Coordinate prevention and response actions in emergencies.
Labor Coexistence Committee — 2 main representatives and 2 alternates on behalf of the employer and employees. It is carried out every quarter.	Prevent workplace harassment, manage complaints and promote coexistence.
Road Safety Committee — Responsible for the Strategic Road Safety Plan. It is carried out permanently.	Carry out preventive activities and analyze road incidents.



Employees training on occupational health and safety

EAt Banco de Occidente, occupational health and safety (OSH) is a fundamental pillar of our well-being and occupational risk prevention strategy. To this end, we have implemented a comprehensive training program aimed at all our employees and employees who, although they are not a direct part of our organization, carry out their work in our facilities or under our supervision.

As part of our OSH management, we identify training needs through a methodology based on risk assessment and evaluation, where we analyze the specific hazards of each job. This process is complemented by the information obtained through the Epidemiological Surveillance System, occupational health diagnosis, investigations of occupational incidents and diseases, as well as analysis of the current epidemiological context. In this way, we ensure that our training is relevant and responds to the real working conditions of our employees.

The trainings are designed in conjunction with specialized professionals, both internal and external, including experts from our Occupational Risk Administrator (ARL), health service provider institutions (IPS) and strategic allies. These trainings can be given in face-to-face, virtual or hybrid mode, depending on the nature of the topics addressed.

In addition, in some cases, theoretical-practical sessions are included to ensure a better appropriation of knowledge.

Among the main trainings we offer is induction and re-induction in the Occupational Health and Safety Management System (OSHMS), aimed at all the bank's employees, including providers of general, temporary, technology, surveillance and security services. In addition, we have specialized courses, such as training at heights for employees who perform work in this type of conditions, training in the safe handling of chemical substances for storage and logistics personnel, and the course in the proper use of personal protective equipment (PPE) for populations exposed to specific risks.

Another pillar of our training strategy is the training of the teams responsible for emergency management. On a voluntary basis, all employees can participate in the emergency brigade course, although for those who are an active part of these groups, training is mandatory. This training covers topics such as first aid, cardiopulmonary resuscitation (CPR) maneuvers, management of syncope, shock and seizures, care for metabolic pathologies such as diabetes and hypertension, fire control and evacuation plans. Similarly, the members of the Emergency Operating Committee (COE) receive training on roles and responsibilities in crisis management, as well as in the identification and response to early warnings in our facilities nationwide.

In the field of workplace well-being, we promote training in ergonomics, active breaks and postural hygiene, aimed at employees in administrative areas,

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to reduce risks associated with prolonged postures and work fatigue. These sessions are taught both face-to-face and virtual and are offered periodically throughout the year. We also carry out training aimed at mental health and stress management, such as training in resilience coping strategies for the members of the Work Coexistence Committee.

Within the framework of Health Week, we hold training sessions on healthy lifestyle habits, where topics such as balanced diet, prevention of chronic diseases and promotion of physical and emotional well-being are addressed. In addition, we have developed specific programs on road safety, with special emphasis on accident prevention, safe driving, reduction of distractions at the wheel and protection of vulnerable road actors.

All these trainings are given at no cost to employees and during working hours, ensuring that participation does not affect their remuneration. In some cases, certain training is mandatory, especially those related to the prevention of critical risks. To evaluate the effectiveness of our training actions, we implement satisfaction surveys and knowledge tests, which allows us to monitor the impact of the programs and identify opportunities for improvement in the management of occupational health and safety.

Through this comprehensive strategy, we reaffirm our commitment to the protection and well-being of our employees, promoting an organizational culture based on prevention and self-care.

During 2024, we reaffirm our commitment to the safety and well-being of our employees through a robust Occupational Health and Safety (OSH) training program. During the year, 559 training activities were carried out aimed at the organization's direct employees, reaching a cumulative 4,510 hours of training. Thanks to these initiatives, we were able to train **7,007 people** in various OSH topics, ensuring the strengthening of the culture of prevention in the bank.

Within these activities, the training with the greatest coverage impacted **6,790 employees,** demonstrating the importance and scope of our education strategies in occupational risk prevention.

In addition, understanding the relevance of safety for all those who provide services in our facilities, we also extended our training strategy to suppliers and contractors. In the same period, we carried out **57 training activities** specifically aimed at these groups, managing to train **541 people** with a total of **29 hours of training.**

With these actions, we seek not only to comply with regulatory standards, but also to strengthen an organizational culture focused on prevention and self-care, impacting both our employees and the strategic allies that are part of our operations.



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Promotion of the health and well-being of employees

At the Bank, we guarantee that our employees have the necessary time to attend medical appointments and procedures, regardless of whether they are scheduled by their EPS, policy or prepaid medical insurance service. Each leader manages these permissions and, when necessary, Human Talent and OSH provide support to ensure compliance.

In addition, we offer health promotion programs:

- **Health Week:** Annual event with talks and activities on wellness, disease prevention and healthy eating.
- **Blood Donation Day:** Spaces in our facilities where health entities facilitate the collection of donations.
- **Executive Check-Up Program:** Specialized medical exams for senior management, middle management, and management.
- **Nutritional Challenge:** Accompaniment in healthy habits for overweight or obese employees.

These initiatives reinforce our commitment to the health and well-being of our teams.

Prevention and mitigation of health and safety risks in business relations

Through our Occupational Health and Safety Management System (OSHMS), we implement preventive measures based on the hierarchy of controls to mitigate or eliminate risks identified in our assessments.

The main focus is on the safety of our customers and visitors in bank branches. In the event of incidents, we carry out investigations to identify causes and apply corrective or preventive actions to prevent their recurrence.

This commitment allows us to ensure a safe environment in all our operations.

NOur indicators

In 2024, we will continue to rigorously monitor our accident, severity, and absenteeism indicators, to strengthen our prevention and workplace well-being strategies.

403-9 Workplace Injury

2022			2023			2024		
Employees	Contractors	Total	Employees	Contractors	Total	Employees	Contractors	Total
3.7	4.2	3.7	2.4	0	2.4	4.1	0	2.4

AT Injuries: (Recordable Work Accident Events/HHT) *1,000,000

The rate of occupational accidents stood at 4.1, reflecting an increase compared to the previous year. This increase is directly related to the greater number of reported events, which in turn may be a consequence of the growth in our workforce, and therefore a greater exposure to operational risks.

In the case of our contractors, the accident rate remained at zero, which shows adequate safety management in outsourced activities. In the combined total of employees and contractors, the rate stood at 4.1, which reaffirms the need to continue strengthening our strategies for the prevention and mitigation of occupational risks.

In terms of occupational diseases, in 2024 two cases were reported in our workforce, which represents a reduction compared to the previous year. This decrease was related to better identification and management of occupational risk factors, as well as the strengthening of ergonomics, active breaks and health monitoring.

For contractors, the rate of occupational diseases remained at zero, and in the total (employees and contractors), the number of cases also decreased compared to 2023. However, we continue to strengthen our occupational health initiatives to minimize the incidence of work-related diseases and improve the quality of life of our employees.



Accident Severity

2022			2023			2024		
Employees	Contractors	Total	Employees	Contractors	Total	Employees	Contractors	Total
1.92	0	1.90	4.45	0	4.43	3.80	0	3.78

ISA Formula: (Workers' Disability Days/HHT) *100
HHT: 13,815,360 employees.
HHT: 122,176 contractors.
Total HHT: 13,903,920.

The accident severity index for our employees stood at **3.80,** which represents a reduction compared to the previous year. This behavior is associated with a decrease in days of disability due to work accidents, which is related to better risk management and effective return to work processes.

For our contractors, the severity rate remains at **zero,** reflecting an adequate management of safety standards in the execution of their activities. In the combined total of employees and contractors, the severity index reached **3.78,** showing an improvement over the previous year.

These results highlight the positive impact of our preventive initiatives and the effectiveness of the safety protocols implemented, which have allowed us to reduce the impact of accidents in terms of days of disability.

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Accident Frequency

2022			2023			2024		
Employees	Contractors	Total	Employees	Contractors	Total	Employees	Contractors	Total
0.72	2.17	0.73	0.47	0	0.47	0.81	0	0.81

IFA Formula: (Accidents at Work Cases/HHT) *100
HHT: 13,815,360 employees.
HHT: 122,176 contractors.
Total HHT: 13,903,920.

The accident frequency rate stood at **0.81 f**or employees, which represents an increase compared to the previous year. This increase is related to a greater number of incidents reported in the year, which is also linked to a growth in our workforce, and, therefore, to a greater exposure to occupational risks.

For contractors, the rate remained at **zero,** which reaffirms the effectiveness of our safety strategies in outsourced processes. In the combined total, the frequency index reached **0.81,** prompting us to further strengthen our accident prevention training and awareness initiatives.

Absenteeism

2022			2023			2024		
Employees	Contractors	Total	Employees	Contractors	Total	Employees	Contractors	Total
13.36	25.61	13.38	13.27	35.39	13.30	14.23	76.42	14.30

Absenteeism: (Days of disability due to AT+EC/Total days worked) *100.
HHT: 13,815,360 employees.
HHT: 122,176 contractors.
Total HHT: 13,903,920.

The absenteeism rate for employees in 2024 was **14.23,** reflecting an increase compared to the previous year. This increase is mainly associated with a greater number of days of disability due to common events, which highlights the need to continue promoting the comprehensive well-being of our employees, including aspects of physical and mental health.

For contractors, the absenteeism rate reached **76.42,** influenced by the increase in days of disability due to common events. This translates into the importance of continuing to strengthen the well-being and health conditions for this group, in line with our occupational health and safety standards.

In the combined total of employees and contractors, the absenteeism rate stood at **14.30,** which motivates us to continue promoting disease prevention initiatives and the strengthening of healthy habits in the work environment.

Achievements

- We received an invitation and recognition from the Ministry of Labor for our Pregnant Women and Breastfeeding Program.
- We participated with our Emergency Brigade — Cali Zone in COP 16.
- We reduced the perception of psychosocial risk by 15% among our employees.
- We maintained 100% compliance with the minimum standards of the OSHMS, according to the rating of the ARL Alfa.
- We carried out the diagnosis of locative and ergonomic conditions in our administrative offices and business centers.
- We guaranteed coverage and participation of our employees in medical evaluations nationwide.



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Commitment to Our Customers

SDG 9.3

At **Banco de Occidente,** we understand that the success of our clients is the engine of economic and business development. For this reason, we are constantly working to provide them with tools and knowledge that allow them to make informed decisions, optimize their operations and strengthen their competitiveness in an ever-evolving environment.

Through various initiatives, we seek to accompany them in their growth, offering them specialized training, strategic advice and innovative solutions that respond to their specific needs. Our mission is to be a key ally in their development, promoting the sustainability and digital transformation of their businesses.

Aware of the current challenges and opportunities offered by the market, we reaffirm our commitment to financial education, regulatory updating and the implementation of technologies that facilitate their adaptation to changes in the environment. Thus, we continue to build value relationships that enhance the positive impact of our clients on the economy and society.

Our commitment to inclusion and accessibility

At Banco de Occidente, we reaffirm our commitment to inclusion through a comprehensive care model for people with disabilities, guaranteeing equitable access to our financial services. From the Financial Consumer Service System (SAC), we strengthen this model through processes that include the following key elements:

1. **Attention protocol:** We have a protocol designed to support the provision of the service and contribute to the effectiveness of communication in all our channels.
2. **Colombian Sign Language Interpreting Service**: We have a specialized service contracted with an external provider, guaranteeing its availability in 100% of our physical channels to facilitate communication with people with hearing disabilities.
3. **Office accessibility:**
   - 100% of our offices have Braille plaques with opening hours.
   - 98.9% of our offices have accessibility adaptations, such as ramps, stairlifts or level accesses, ensuring an inclusive environment for our customers.
4. **Digital accessibility:**
   - We make contracts available in audio format for people with visual disabilities.
   - We implement subtitles in financial education videos published on our portals and communication channels.
5. **Guide dog entry policy:** We have an established policy that allows assistance dogs to enter all of our offices.

In addition, we periodically monitor compliance with these processes, accompanying the different channels to ensure their proper implementation.

Inclusive assistance trainings

To strengthen the culture of inclusion and respect, we provide annual trainings to our staff, ensuring that they acquire the necessary skills to properly serve people with disabilities. These trainings include:

- **Virtual course on care for people with disabilities:** It provided practical tools for interaction with people with different types of disabilities (hearing, visual, physical, among others), including simulations and guidelines to offer an inclusive and efficient service.
- **Virtual course on the Financial Consumer Service System (SAC):** Reinforced knowledge on the protection of the rights of financial consumers, with a special focus on the most vulnerable groups.
- **Financial Consumer Ombudsman (DCF) Virtual Course:** Explained the role of the Ombudsman and their work in protecting the interests of all clients, including those with disabilities.
- **Basic sign language workshop:** Available on our digital platform for all employees, promoting better communication with people with hearing disabilities.

As a result of our commitment to financial inclusion, by 2024 we were able to:

- ✓ **Serve 12 hearing-impaired customers across our different channels.**
- ✓ **Adapt 173 branches with improved accessibility.**
- ✓ **Train 5,910 employees in inclusive assistance.**

With these initiatives, we reaffirm our responsibility to offer an accessible banking service, ensuring that all people, regardless of their condition, can access our financial solutions in an equitable and dignified manner.



Banking Correspondents

Our Correspondent Banking channel has been key to expanding access to financial services in rural communities and disadvantaged sectors, where the presence of bank branches is limited. During 2024, we managed to increase the number of service points in hard-to-reach regions, going from 53,000 in 2023 to **90,000** by the end of the year. This facilitated essential transactions such as bill payments, PILA, withdrawals, and deposits, as well as boosting the banking penetration of the Dale! digital wallet in the correspondent Point of Payment, with more than **59,000** connections in the last four months of the year. With these actions, we have reduced the geographical and economic barriers that exclude many people from the formal financial system.

To ensure that our services are accessible and understandable to everyone, we have worked on simplifying and standardizing processes at correspondent banking points. We prioritize the training of correspondents, who are the first point of contact with communities, ensuring that they provide clear and effective guidance. We also design materials and signage in an accessible language, making it easy to use our services regardless of the educational level of the users. Although we have not yet implemented specific financial education programs with the communities, we focus on making our service points work as an extension of the Bank, bringing services closer in a practical and understandable way.

Although the Banking Correspondent Unit has not developed specific financial education programs, at a global level we promote educational initiatives through communication campaigns. These seek to raise awareness among customers about the

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responsible use of credit and savings, indirectly reaching the communities served by banking correspondents. In this sense, correspondents play a fundamental role in making it easier for users to understand how to carry out basic transactions safely and effectively, reinforcing our commitment to financial inclusion.

We measure the social impact of our banking correspondents through key indicators such as the increase in Dale!'s banking penetration and transaction volume. In 2024, we achieved a **14%** growth in transactions and **1,987%** in Dale!'s banking penetration, contributing significantly to the financial inclusion of these communities.

In terms of sustainability, in 2024 we began the implementation of the **Stand–in initiative,** designed to ensure the operational continuity of banking correspondents even in cases of disruptions in our systems. With this system, customers can make payments and other transactions without being affected by operational outages, ensuring a smooth and reliable experience. In addition to improving efficiency, this initiative reduces the need for additional travel for users, reinforcing our commitment to accessibility and sustainability in financial services.

We also implemented several innovations in our Correspondent Banking channel to improve its efficiency and sustainability:

- Migration of the dedicated SuperGIROS and Point of Payment channel, which reduced operational interruptions and improved the customer experience.
- Phase 2 of SuperGIROS, which enabled new services such as cardless withdrawals from the Aval Banks and Dale!, as well as deposits and payments to third parties in cash.
- Increase in ceilings in Efecty, going from $500,000 to $1,000,000 per collection, facilitating transactions of greater amounts.
- New strategic alliances with networks such as Farmatodo and Gane through Puntored, expanding our coverage and bringing our financial services even closer to customers.

With these advances, **we continue to strengthen our commitment to financial inclusion and accessibility,** ensuring that more and more people have access to quality banking services.

Location and Number of Correspondent Points	2023	2024	Change (%)
Amazonas	23	32	39%
Antioquia	2.065	5.635	173%
Arauca	455	911	100%
San Andrés, Providencia Y Santa Catalina	109	170	56%
Atlántico	3.224	4.413	37%
Bogotá, D, C,	10.641	22.153	108%
Bolívar	2.956	4.579	55%
Boyacá	1.527	2.532	66%
Caldas	1.261	1.746	38%
Caquetá	732	1.145	56%
Casanare	714	1.324	85%
Cauca	1.414	1.719	22%
Cesar	1.651	2.549	54%
Chocó	326	432	33%
Córdoba	1.742	2.280	31%
Cundinamarca	3.177	5.764	81%
Guainía	30	48	60%
Guaviare	112	215	92%
Huila	1.347	2.283	69%
La Guajira	832	1.317	58%
Magdalena	1.517	1.840	21%
Meta	1.511	2.484	64%
Nariño	1.323	1.879	42%
Norte De Santander	2.468	3.805	54%
Putumayo	244	441	81%
Quindío	688	917	33%
Risaralda	956	1.466	53%
Santander	2.638	4.163	58%
Sucre	1.230	1.790	46%
Tolima	1.149	1.831	59%
Valle Del Cauca	5.749	7.972	39%
Vaupés	28	56	100%
Vichada	59	112	90%



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CX Awards: Recognizing excellence in customer experience

At Banco de Occidente, we are committed to offering an exceptional experience to our customers. As part of this commitment, every year we hold the CX Awards, an event in which we recognize the areas, offices and employees that have implemented successful initiatives and have generated a positive impact on the experience of our customers.

The selection of the awarded projects is made through a call open to all areas of the bank. During this phase, the areas nominate the projects implemented throughout the year that have significantly improved the customer experience. A specialized team evaluates each initiative and defines the finalists. Subsequently, an evaluation jury analyzes the projects and selects the winners based on predefined criteria. Winners are announced and recognized at the annual customer experience event.

Categories evaluated

The CX Awards include six categories, each highlighting a key aspect in the transformation of the customer experience:

- **Best Projects:** We recognize teams that have implemented innovative solutions and transformed key moments in our customers' journey. These projects have used customer experience tools to generate tangible impacts on the bank's profitability and customer satisfaction.
- **Best ENSI (Internal Satisfaction Level):** We celebrate areas that have achieved maximum internal customer satisfaction. This recognition highlights the synergy between areas, teamwork, accessibility and empathy in service.
- **WOW Offices:** We recognize offices that have excelled in exceptional customer service performance. The evaluation considers satisfaction studies, unknown customer results, participation in customer experience campaigns, and implementation of improvement plans.
- **WOW Employees:** We recognize those employees who have exceeded expectations, creating unforgettable experiences for our customers. These employees have been praised by customers and internal teams, leaving an indelible mark on every interaction.
- **Best Managers:** We distinguish commercial managers with the highest levels of recommendation from our clients. Their advice, solutions, accompaniment and empathy have made them benchmarks within the bank.
- **Experience Ambassadors:** A group of employees from different areas who inspire the organization to achieve memorable experiences. They participate in the co-creation of solutions to challenges identified in the customer experience and promote best practices in their day-to-day work.



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Tangible impact on customer experience

During 2024, we received more than 30 projects at the CX Awards. Most of these were successfully implemented, generating positive results both in terms of revenue and customer experience.

The distribution of awards in 2024 was as follows:

- **Best Projects:** 3 winners.
- **Best ENSI:** 14 recognized areas and managements.
- **WOW Offices:** 17 featured offices.
- **WOW Employees:** 14 award-winning employees.
- **Best Managers:** 30 managers recognized.
- **Experience Ambassadors:** 5 distinguished employees.

Through the CX Awards, we reaffirm our commitment to innovation, continuous improvement and excellence in customer service. We will continue to promote initiatives that strengthen the customer experience and recognize those who, with their dedication and effort, contribute to making Banco de Occidente better every day.

Customer Recommendation Index (NPS)

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At Banco de Occidente, customer experience is a strategic priority. Our overall NPS has remained stable in recent years, **reaching 68%** in 2024, close to our goal of 70%. In Business Banking, we achieved an increase of 2 percentage points, reaching the best NPS in the last four years and reflecting an improvement in the perception of our business customers. In Personal Banking, the indicator remained stable compared to 2023, although we continue to work on opportunities for improvement to strengthen our customers' recommendation and achieve the proposed goals.

To better understand the perception of our customers, we carry out constant measurements that allow us to identify strengths and areas of opportunity. We look at what our customers value most and the critical aspects we need to focus on to reduce friction in the experience. Our promoter clients highlight the

quality of our service and the portfolio of products and services, key factors in loyalty. On the other hand, passive and detractor customers show a lower recommendation when they perceive that we are not timely and close enough in service, or when they encounter difficulties with our products, services and channels.

In 2024, **we evaluated the satisfaction of 4,584 customers,** representing 0.46% of our customer base, with samples selected under statistical criteria that guarantee representativeness and a margin of error equal to or less than 5%. This methodology, endorsed by IZO, an international expert provider of quantitative measurements, ensures the reliability of our results.

Satisfaction measurement	2021	2022	2023	2024	What was the goal for the year 2024?
Satisfaction measurement (%)	68	68	67	68	70
Data coverage (%)	0.63	0.54	0.40	0.46	

While some goals were not fully achieved, the stability in our metrics and growth in key segments demonstrate the positive impact of our strategies on the customer experience. We continue to strengthen our actions to ensure that our measurements accurately reflect the perception of our customers, mitigating any impact on our external assessments such as the DJSI.

Mechanisms for Petitions, Complaints, Claims and Suggestions — PQRS

At Banco de Occidente, we manage our clients' Requests, Complaints, Claims, and Suggestions (PQRS) with commitment and efficiency. During 2024, we received a total of **276,720 requests,** of which **275,341** were resolved, reaching a **99.50% effectiveness i**n the response.

Specifically, we attended to **252,160 requests,** resolving **250,849** of them (99.48%), and managed 24,560 complaints, of which **24,492 were resolved (99.72%).**

These results reflect our commitment to transparency, continuous improvement and customer satisfaction.

Customer Experience Excellence Training

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At Banco de Occidente, we believe that an exceptional experience for our customers starts with highly trained teams aligned with our service culture. For this reason, we promote training programs designed to strengthen the skills and knowledge of our employees in each business segment, ensuring that they can provide expert advice, personalized solutions and attention that generates trust and loyalty.

Throughout the year, we have developed training initiatives focused on each of our banks and segments, addressing key topics such as understanding customer needs, process optimization, digitalization and service excellence. These programs have allowed us to improve interaction with our customers and enhance the recommendation of our products and services.



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Corporate banking training

At Banco de Occidente, we understand the importance of keeping our clients informed and updated on the main challenges and opportunities of the economic, financial and regulatory environment. For this reason, we develop training spaces aimed at entrepreneurs and strategic customers, with the aim of strengthening their decision-making capacity, optimizing risk management and promoting the sustainable growth of their businesses.

Over the last year, we have carried out several training sessions on key topics for the business sector, addressing everything from macroeconomic challenges to investment opportunities in renewable energy. Below are some of the most notable events:

- **Evaluation of the main challenges for the Colombian entrepreneur:** 2-hour session in which the global and local challenges that affect the country's economic growth were analyzed, with emphasis on macroeconomic risks and political and fiscal uncertainty. **45 businessmen** participated, with an investment of **$2,824,640.**

- **Bogotá Treasury Forum:** 2-hour meeting where the challenges of the local and international economy in terms of growth, inflation, exchange rate and monetary policy were addressed, providing key tools for strategic decision-making. **40 customers** attended, with an investment of **$2,140,560.**

- **Photovoltaic Energy Forum:** Space of 2 hours and 30 minutes in which the different tax incentives available for investments in solar power projects were presented, highlighting their environmental impact and contribution to sustainable development. It had the participation of **14 customers.**

- **Talk on Exchange Regime:** Session of 1 hour and 30 minutes in which clients were updated on the exchange regulation of the DIAN, providing key information to optimize foreign trade transactions. **75 customers** participated.

- **OcciRed Forum: Update and learn more about OcciRed:** 2-hour space where the news of the OcciRed portal was presented, along with security recommendations to protect customers' financial operations. It had **10 customers.**

These spaces have been highly valued by our clients, as they allow them to analyze in greater depth the economic, regulatory and technological context in which they operate, improving their management and decision-making capacity. In addition, they reinforce our loyalty strategy, strengthening the bank's commercial relationship and closeness to our customers.

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Government banking training

As part of our commitment to the efficient management of public finances and institutional strengthening, we have developed multiple training spaces for government entities at the territorial and national levels. These initiatives have made it possible to update and strengthen the capacities of employees in tax regulations, financial management and key digital tools for public administration.

Here are some of the most outstanding trainings:

- **Stamps – Tax Regulations:** 2-hour training aimed at the Government of Cauca, in which the current regulations on Tax Stamps were deepened. We had 75 attendees and an investment of $1,081,428.
- **Change Management:** Training space for the municipality of Yumbo, focused on strategies for the implementation of CS3 software, with the aim of optimizing the process of adopting organizational change. 60 employees participated, with an investment of $980,000.
- **SECOP II:** 2-hour training aimed at the municipality of Medina, with the purpose of strengthening the knowledge and applicability of the SECOP II platform in future public procurement. It had 58 attendees and an investment of $754,000.
- **Development Plan:** Advice for the municipality of Puerto Tejada in the construction of its Development Plan, providing tools for its alignment with the current regulatory framework. 35 employees participated and the investment was $754,000.

In addition, we have developed other key trainings, including:

- Management of resources of the General System of Participations (SGP) for the municipality of Medina.
- Territorial taxes and property tax for the District of Cartagena.
- Financial diagnosis and budgetary control for the Department of Huila and the Municipality of Neiva.
- Settlement and collection of property tax for the Department of Nariño.
- Multipurpose Cadastre for the Municipality of Puerto Salgar.
- Dissaving in Pension Liabilities – FONPET, aimed at multiple municipalities, including La Vega (Cauca), Antioquia, Santa Fe de Antioquia, Ebéjico, Soata, Pailitas (Cesar), Coveñas, among others.

In total, these trainings have represented an investment of $24,685,423, impacting numerous municipalities and departments of the country. Through these spaces, we have been able to strengthen public management, improve fiscal planning, and support compliance with key regulations in the government sector.



Business and SME Banking Traininge

At **Banco de Occidente,** we are committed to the growth and strengthening of our business customers and SMEs. Through our training, we provide key tools to improve the competitiveness and sustainability of their businesses, facilitating updating on strategic and operational issues.

During 2024, we carried out a total of 12 specialized trainings, designed to meet the needs of our clients in areas such as digital transformation, leadership, human talent management, labor law, sustainability, artificial intelligence and strategic planning.

One of the most relevant programs was the **2024 Tax Reform Update,** where we made it easier for our clients to understand the key changes in Colombian tax legislation. Thanks to this space, 1,395 companies and 763 SMEs were able to update themselves on current regulations, with a total attendance of 677 people.

In line with our commitment to innovation, we deliver the training **The Key to Digital Transformation in Processes and Products,** focused on innovative strategies and emerging technologies. This session was attended by 334 companies and 104 SMEs, benefiting 109 attendees.

Human talent management is a fundamental pillar in business sustainability, which is why we developed the **Human Talent Management by Competencies** training, where 897 companies and 672 SMEs acquired key tools to strengthen their human capital, with an attendance of 320 people. In addition, the

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Labor Law for Non-Lawyers course allowed 1,142 companies and 896 SMEs to understand essential aspects of labor legislation, with the participation of 471 attendees.

As part of our commitment to equity and digital transformation, we carry out the training **Artificial Intelligence in Business and the Relevance of Female Leadership,** where we provide knowledge in AI applied to strategic decision-making. This initiative impacted 1,278 companies and 656 SMEs, with an attendance of 524 people.

In the field of organizational leadership, we developed the **Leadership for Senior Management** training, with the aim of strengthening the competencies of managers and improving their management capacity. This session had 385 companies and 216 SMEs, benefiting 159 attendees.

Committed to business sustainability, we carried out training in Business Sustainability Management, where 227 companies and 91 SMEs strengthened their knowledge in sustainable practices.

Regarding the integration of new technologies, we offered the **Big Data and Artificial Intelligence for Non-Engineers** course, providing knowledge on the application of these tools in business management. This program had 413 companies and 176 SMEs, impacting 153 attendees.

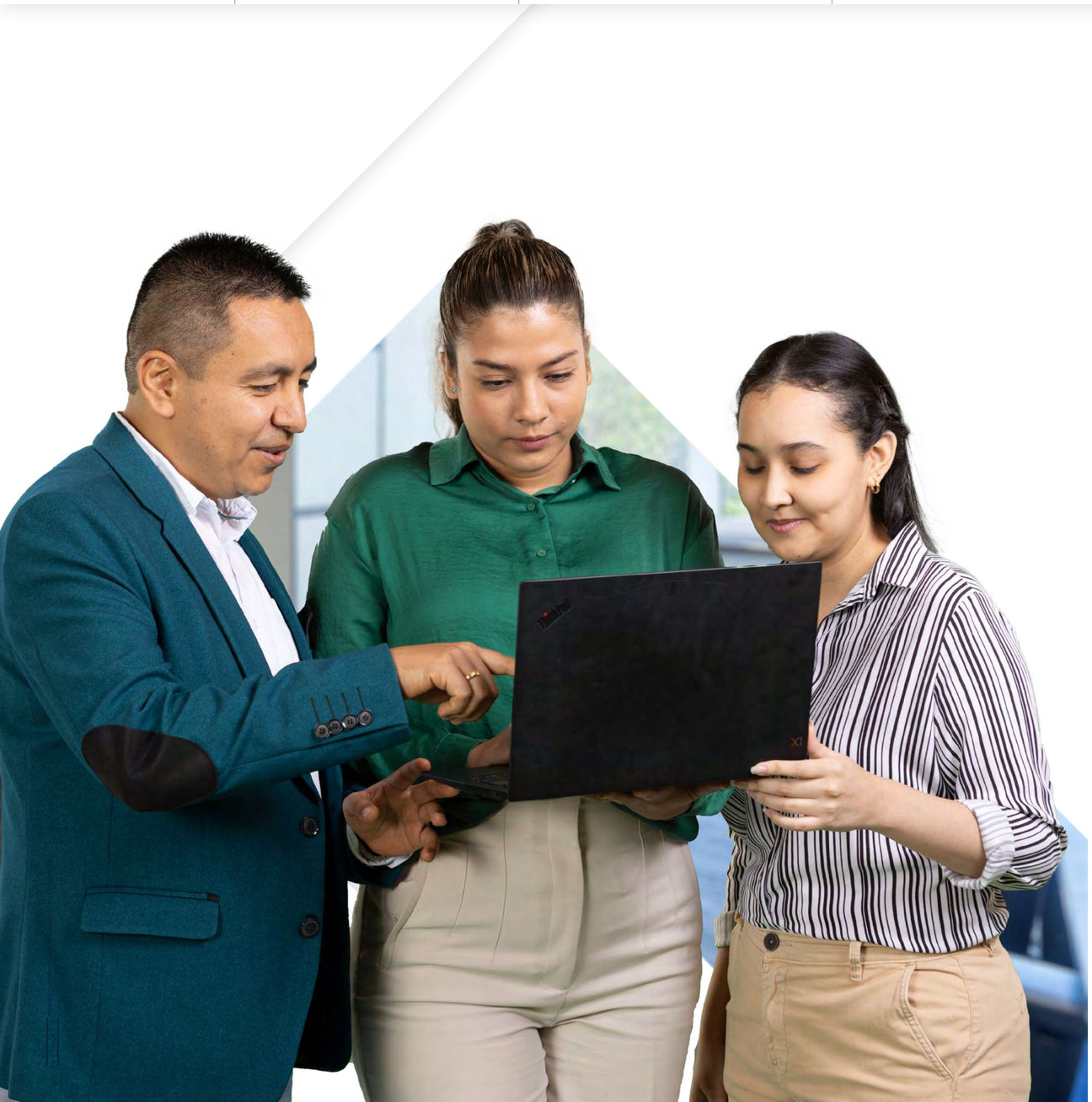
To optimize operational efficiency, we developed the **Supply Chain Management** training, in which 208 companies and 164 SMEs acquired tools to improve logistics and supply, with an attendance of 71 people. Likewise, in the **Effective Management Indicators** session, we trained 435 companies and 157 SMEs in the formulation and implementation of business metrics, benefiting 131 attendees.

In terms of strategic planning, we provided the **Strategic Planning (Marketing and Finance) t**raining, where 665 companies and 460 SMEs learned to align commercial and financial strategies to strengthen their competitiveness, with an attendance of 316 people. Finally, in the **UX/UI – Customer Experience** training, we provided tools to improve usability and user experience on digital platforms, impacting 150 companies and 45 SMEs, with an attendance of 112 people.

For the execution of these trainings, we made a total investment of $324,342,912, guaranteeing the availability of experts, materials and technological resources to provide a high-quality learning experience to our customers.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FOGAFIN



Maestros del Hacer

At Banco de Occidente, we recognize the importance of financial education as a fundamental pillar for economic and social development. Therefore, through our Maestros del Hacer program, we offer a comprehensive training platform that provides our clients and communities with tools to strengthen their financial knowledge and improve their economic decision-making capacity.

The program is designed with a holistic approach, combining digital resources, business training, and internal training for our employees. Its main objective is to promote financial planning, access to relevant information on financial products and services, and the adoption of good practices in money management.

Impact and scope

During 2024, **Maestros del Hacer** has strengthened its training initiatives, impacting various segments of the population through activities structured around three main axes:

- **Training in financial education:** Through courses, workshops and diplomas, topics such as savings, debt management, investment, financial planning and business finance have been addressed.
- **Business strengthening:** With initiatives such as My SME Business Community, we have provided specialized training to employees of client companies, contributing to the sustainability and growth of their businesses.
- **Internal training:** A personal finance course was implemented for our employees, to improve their financial knowledge and strengthen their ability to advise clients.

The impact of the program is measured through indicators such as the number of people trained and the number of diplomas awarded in partnership with LatinPyme:

- **77,020 beneficiaries** participated in training activities.
- **COP 50,000 million** were allocated to strengthen financial education.
- Training was held for bank employees as part of a pilot training program in personal finance.

Going forward, we seek to expand the program's coverage and establish additional metrics to assess its impact on beneficiaries' financial decision-making.

With Maestros del Hacer, we reaffirm our commitment to sustainable development, promoting financial inclusion and economic empowerment of the communities in which we operate.

Commitment to Communities

SDG 10.2; 17.5

At **Banco de Occidente,** we believe in the transformative power of knowledge and education as fundamental pillars for the development of communities. Our commitment goes beyond financial solutions, encompassing initiatives that promote inclusive growth, sustainability and the generation of opportunities for different sectors of society.

Through training spaces, we strengthen the social and business fabric of communities, providing practical tools that allow them to improve their quality of life, enhance their skills and access new economic opportunities. Our focus is on capacity building, empowering vulnerable groups, and fostering sustainable practices that contribute to a more equitable and resilient future.

At the bank, we reaffirm our purpose of generating a positive impact on the communities with which we interact, consolidating ourselves as a key player in the promotion of social well-being and sustainable growth.

Strengthening access to water and sanitation in vulnerable communities with UNICEF

I BdO-15 I

At Banco de Occidente, we are committed to the social and economic development of the country's most vulnerable communities. In line with this purpose, for three years we have strengthened our alliance with UNICEF and the WASH (Water, Sanitation and Hygiene) program, through which we promote a donation program that has allowed us to generate a real impact in La Guajira. Thanks to this joint effort, we have brought drinking water and better sanitation conditions to more than 26 communities in the municipalities of Manaure and Uribia, transforming their environment and quality of life.

UNICEF's work is critical to ensuring children's rights in more than 190 countries and territories, and in Colombia, its focus on water, sanitation and hygiene has led to solutions tailored to the needs of the most vulnerable communities. Through the WASH program, we work so that children and adolescents have access to drinking water and can grow up in healthy environments that promote their well-being and integral development.

Our support has been key to the construction of six new water supply systems, contributing to sustainable access to basic sanitation services. In 2024, we allocated $283,703,267 to this program with the valuable contribution of 1,122 customers, and since 2022, we have donated a total of $1,910,229,925. Thanks to this joint effort, we have been able to:

- Generate impact in 1,028 people, including 343 children and adolescents, in 24 communities.
- Provide access for 4,100 people to basic sanitation, of which 1,000 live in emergency contexts.
- Certify 1,500 people as free of open defecation.
- 12,000 people in humanitarian emergency contexts with access to safe drinking water and quality services.
- 14 strengthened health centers with access to water, sanitation and hygiene, promoting the right to health of children and adolescents.
- 20,600 menstruating girls and adolescents benefited from menstrual hygiene supplies and education, of which 20,000 live in humanitarian emergency contexts.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

This impact transcends access to basic services, since having drinking water and adequate sanitation allows other fundamental rights, such as health, nutrition, education and child protection, to be guaranteed. Improving conditions in schools and communities not only prevents diseases and reduces school dropouts but also promotes a safer and more dignified environment for the development of children and adolescents.

At Banco de Occidente, we reaffirm our commitment to the well-being of communities and will continue to work together with UNICEF to expand our impact, contributing to the construction of a more sustainable and equitable future.

Social Investment

SDG 10.2; 13.2; 15.1;

Environmental volunteering

At Banco de Occidente, we reaffirm our commitment to sustainability and social well-being through various volunteer initiatives, in which our employees actively participate to generate a positive impact on the community and the environment. These activities allow us to strengthen ties with society, consolidate our organizational culture and contribute to the personal and professional development of those who are part of our team.

Community impact

Our volunteer days bring us closer to the communities and strengthen our relationship with them. Through environmental conservation and social support activities, we promote sustainable development and the regeneration of natural spaces, in addition to contributing to the well-being of vulnerable populations. This commitment has allowed us to consolidate ourselves as a responsible and sustainable entity, generating trust and recognition in our environment.

Development of our employees

Volunteering gives our employees the opportunity to strengthen skills such as teamwork, leadership, and communication, while fostering a strong sense of social responsibility. These experiences generate a positive impact on their motivation and commitment, promoting a greater sense of belonging and pride in contributing to collective well-being.



Our achievements in 2024

During the last year, we carried out 14 volunteer days, mobilizing approximately 735 volunteers in different cities of the country. Among our main achievements are:

- 1,943 seedlings planted in strategic natural areas.
- 4 days in Bogotá, with a constant participation of 60 volunteers per day and a total of 560 seedlings planted.
- 3 days in Medellín, with the maintenance of trails and reseeding in the Arví Park, with the participation of 131 volunteers.
- 3 days in Barranquilla, where 105 volunteers planted 600 seedlings on the Vía Parque Isla Salamanca.
- 4 days in Cali, reaching the largest number of seedlings planted (783) and the largest call of the year with 93 volunteers in September.
- 2 days of social volunteering, impacting the Casita de Belén Foundation in Cali, with the participation of 36 children and employees, through recreational activities.

Through these actions, we reaffirm our commitment to sustainable development, integrating our employees and the community in initiatives that generate positive and lasting impacts.





VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Donations for Social and Sustainable Development

SDG 17.5 ;10.2
I BdO-16 I

At Banco de Occidente, our donations are part of our Social Investment policy, understood as a voluntary act through which we provide financial or in-kind resources with the aim of generating a positive impact on communities and populations in vulnerable situations. These donations are part of our three strategic pillars: environmental conservation, education for development and conscious social growth.

Through this approach, we seek to strengthen initiatives that promote respect for fundamental rights, contribute to the improvement of people's quality of life and foster the sustainable development of the regions in which we have a presence. Each donation responds to our commitment to generate value in society and support the progress of communities through access to opportunities that allow their well-being and growth.

Our donations are aligned with our corporate purpose of making the development of people, the growth of businesses and the transformation of the country a reality. Through these contributions, we expand our impact to territories and populations that we do not necessarily reach with our financial operation, allowing the consolidation of relationships of trust with communities and social organizations.

The identification of needs in the territories where we operate facilitates the establishment of strategic alliances and the definition of initiatives that contribute to improving the living conditions of the population, promoting long-term solutions and generating shared value with the different actors involved.

Donations made and areas of impact in 2024

During 2024, our donations were aimed at meeting priority needs in education, economic development and social welfare. Based on our Social Investment policy, we carry out actions aimed at strengthening access to education for children and young people in vulnerable conditions, guaranteeing opportunities for complementary training, development of socio-emotional competencies and skills, as well as support in their personal and professional growth process.

In the field of economic development, we promoted the promotion of local economies through the identification, articulation and management of initiatives that promote environmental sustainability and social progress in different regions of the country. These actions allowed us to consolidate alliances with strategic entities and actors that work to promote entrepreneurship, employability and capacity building in communities that require opportunities to improve their living conditions.



We also carry out efforts for the implementation of food security programs and transformation of life projects, providing beneficiaries with tools for access to food, income generation and development of leadership skills. These initiatives contributed to the construction of more resilient environments and the generation of opportunities for the growth and well-being of communities.

ProPacífico

Foundation for the Integral Development of the Pacific

Our support allows the identification and management of a regional agenda that promotes access to education, the strengthening of the health system, research in science, and the social development of vulnerable communities. We benefit more than **5,165,000 people** in Cali and Valle del Cauca, prioritizing populations in situations of exclusion, children and young people, people with disabilities, ethnic communities and rural population. We allocated **$150,000,000 COP** contributing to social development, environmental sustainability and economic progress in Valle del Cauca and the Pacific region.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Our impact is reflected in:

- Expansion of educational coverage and improvement of its quality.
- Support for the public health system in the region.
- Promotion of research in economics, sociology and public policy.
- Protection of vulnerable populations and promotion of fundamental rights.
- Development of essential infrastructure and public services.
- Promotion of transparency, citizen participation and the fight against corruption.
- Promotion of recreational and environmental activities for the community.
- Support for entrepreneurship and business growth.

With this donation, we continue to contribute to the well-being and sustainable development of the communities that need it most.

In addition, for this same foundation we allocated **$311,000,000** to strengthen key programs of Compromiso Valle, which positively impact various communities in the region, promoting well-being, equity and sustainability through:

- Food security, guaranteeing access to adequate food for vulnerable populations.
- Transformation of life projects, providing tools and opportunities to young people and adults to improve their quality of life.
- Employability, facilitating access to training and job opportunities to strengthen economic autonomy.
- Strong leadership, fostering citizen participation and building resilient communities.
- Entrepreneurship, supporting the development of sustainable businesses that generate a positive impact in the region.



Asociación de Nuevo Futuro de Colombia

As part of our commitment to inclusion and social development, we allocated **$7,000,000 COP** to this association, benefiting **16 young university students with the Administrative Process for the Restoration of Rights at the ICBF.** This contribution seeks to strengthen skills, life projects and the maintenance of young people who did not have the opportunity to grow up in a stable and protective family environment. Many of them have faced situations of abuse, abandonment and violence, so this initiative represents a key opportunity for their well-being and development. The impact of this donation translates into:

- Recreational, cultural and sports activities, essential for their emotional well-being, social integration and consolidation of support networks.
- Improvements in the university house, including rental arrangements and the purchase of a microwave oven, creating a more welcoming and functional environment for young people to concentrate on their studies and life projects.

With this contribution, we reaffirm our commitment to provide real opportunities to those who need it most, promoting their personal and academic growth in a safe and appropriate environment.

ProBarranquilla Foundation

Under our pillar of social growth, we contribute to the realization of socioeconomic development projects, promoting the attraction and retention of investments, business tourism and the management of the business framework, through the allocation of $17,833,000.

With a **direct impact on 200 people** and more than 2,000,000 indirect beneficiaries, these actions generated employment, allowing more people to access formal job opportunities to improve their quality of life and guarantee their economic stability. Additionally, we promoted the reduction of inequalities by supporting vulnerable communities, encouraging academic training for human talent; practices that strengthen infrastructure, drive sustainable decisions, and foster strategic alliances for the region's economic growth.

Corporación Tecnocentro Cultural Somos Pacífico

We impacted more than 50 elderly people in vulnerable sectors of Eastern Cali, where we contributed to improving the quality of life of the beneficiaries through **artistic practices,**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

psychosocial workshops and productive training, contributing to the strengthening of their livelihoods and the preservation of their cultural identity. In addition to training in **dance, music and plastic arts,** the project included the creation of productive units, promoting income generation and the empowerment of the participants, our contribution was for **$20,000,000.**

Valle del Cauca Action Unit

We impacted 193 people, including social, community and business leaders, through workshops and multi-stakeholder meetings with the aim of **strengthening citizen leadership and transparency in public management.** In addition, 146 young people participated in training on social control, ethics and state contracting, 17 leaders in deepening exercises and 30 businessmen in a dialogue on public credit. These actions promoted the democratization of information and citizen involvement in decision-making and we also managed to contribute **$48,900,000.**

FUNDAMOR

As part of our commitment to social investment, we supported initiatives that have an impact on children and adolescents in vulnerable situations. Through our monetary contribution of $20,000,000, we also benefited two key programs:

- **Población Dejando Huellas:** 140 girls and boys between 5 and 12 years old, along with 122 families, strengthened their socio-emotional and cognitive skills through ecology activities, robotics and workshops on managing emotions. These tools promoted their autonomy, critical thinking and ability to relate positively to their environment. (Indirect impact: 1,048 people).
- **Población Tejiendo Sueños:** 352 school students participated in educational sessions aimed at leadership development and socio-emotional competencies, indirectly impacting 1,600 people, including teachers, students and families.

In addition, on **World HIV/AIDS Day,** we contributed to the awareness campaign **"Cookie Day"**, where 3,000 people received information on HIV/AIDS prevention and awareness in various shopping malls.

As part of our customer relationship strategy, in December 2024, from the **Customer Development team of the Marketing and Segment Management,** we made an alliance with **Fundación Dar Amor,** through which we delivered notebooks with messages alluding to the purpose of the foundation to different customers. In addition, we made a social contribution of **$8,000,000 COP** to the **"School of Peace"** program, which promotes sustainable pedagogical development and environmental conservation in rural areas of northern Cauca. This program uses educational materials and activities designed for the holistic growth of children and adolescents with HIV.

This initiative allowed us to transform a relationship activity into an action with social impact, aligned with our social investment model and our commitment to the development of the most vulnerable communities.

Government Banking and its impact on society

At **Government Banking,** we reaffirm our commitment to social development through initiatives aimed at vulnerable populations, especially minors, indigenous and ethnic communities. Our purpose is to contribute to the well-being of these communities through the delivery of **school kits, Christmas toys, items for people with disabilities, among other essential**



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

elements that strengthen social programs focused on improving the quality of life and the integral development of people.

All these actions are part of a **voluntary contribution,** mainly aimed at social strengthening, without neglecting the environmental and economic impact on the public entities with which we work.

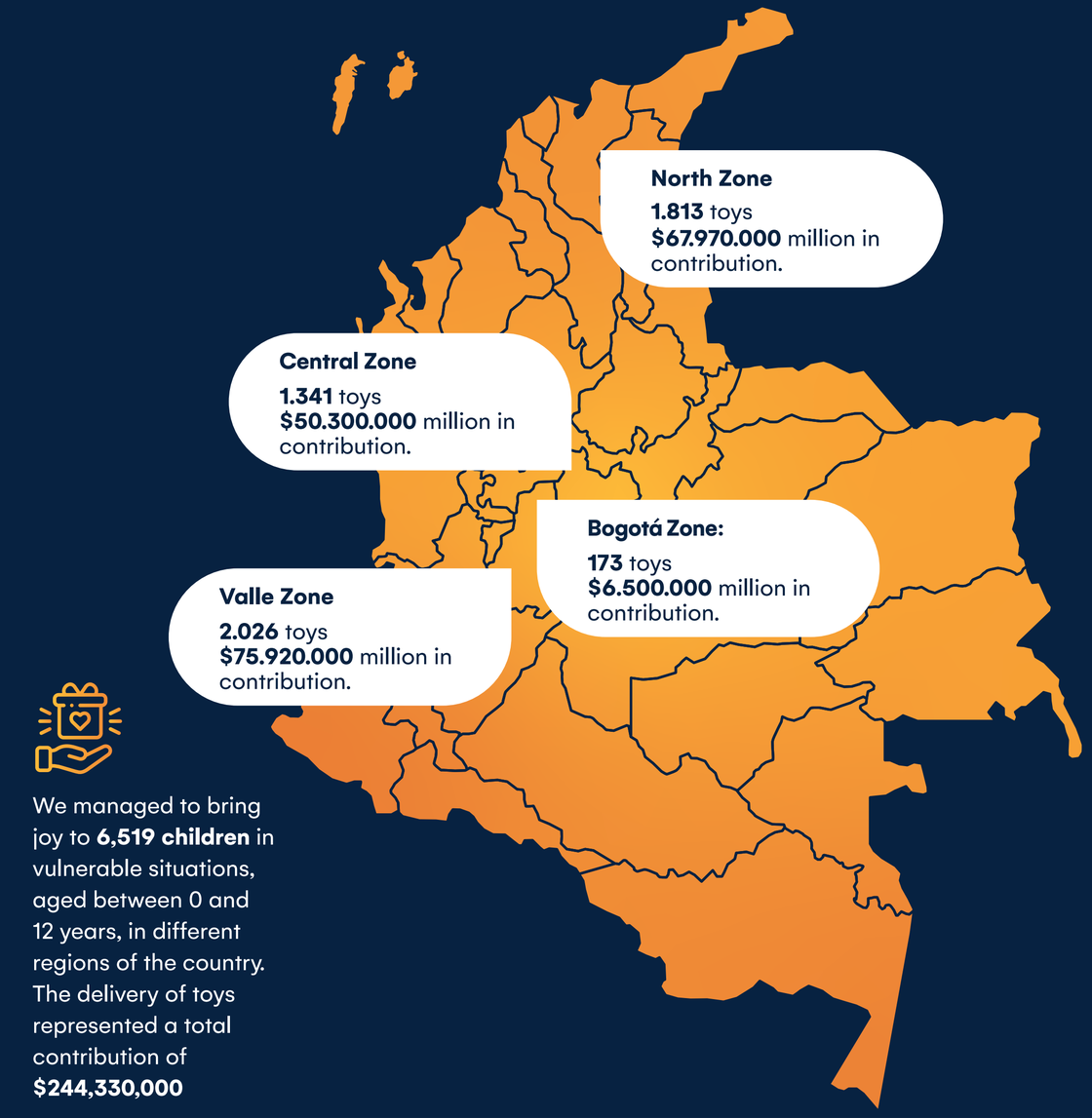
As part of our focus on social equity and respect for the human conditions of survival, we have promoted various initiatives in rural sectors and surrounding communities, coordinating efforts with government entities to bring aid at different times of the year:

- **Delivery of toys in December:** Benefit for children in vulnerable situations, promoting inclusion and access to recreational spaces.
- **School kits:** Provision of school supplies to facilitate access to education in communities with economic constraints.
- **Farmer's kits:** Provision of basic tools for agricultural work, supporting productivity in rural communities.
- **Food and health aid:** Assistance to communities affected by forced displacement emergencies, guaranteeing basic supplies for their well-being.
- **Articles for people with disabilities:** Provision of implements that improve the quality of life and promote inclusion.

The investments for these initiatives vary according to the program and the needs of the beneficiary community, with contributions ranging from **$500,000 to $8,000,000 COP** per initiative.

Within the framework of our sustainability strategy, and aligned with the axis of social growth, we successfully completed our initiative, where we managed to bring joy to **6,519 children** in vulnerable situations, aged between 0 and 12 years, in different regions of the country. The delivery of toys represented a total contribution of **$244,330,000**, distributed as follows:

To measure the impact of these actions, we measure the scope of each initiative through the **total population benefited** by each contribution, allowing us to evaluate and optimize our social intervention strategies. Highlighting that all the initiatives developed comply with **ABAC policies** and are aligned with our strategic axis of **social growth,** ensuring that our actions are sustainable, ethical and with a positive impact on society.



We managed to bring joy to **6,519 children** in vulnerable situations, aged between 0 and 12 years, in different regions of the country. The delivery of toys represented a total contribution of **$244,330,000**

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Annexes



Great Place To Work. Certificada AGO 2024-AGO 2025 COL

#1 EL MEJOR LUGAR PARA TRABAJAR EN COLOMBIA

Banco de Occidente | Grupo AVAL

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FACEBANK

Acknowledgements



At Banco de Occidente, we are convinced that **sustainability is a collective effort and that true impact is built with the participation of everyone.** This report is a reflection of the commitment of those who, from different fronts, have contributed to strengthening our vision of responsible and sustainable business.

To our employees, thank you for your dedication and for making sustainability an essential part of our day-to-day work. To our customers and allies, for trusting us and motivating us to continue innovating in solutions that generate shared value. To our communities, for allowing us to be part of their growth and development, and to our investors and other stakeholders, for accompanying us on this path and reaffirming with us the importance of integrating environmental, social and governance criteria in our management.

From the Sustainability Management, we reaffirm our commitment to continue working on the side of those who do, moving forward with determination in the construction of a more sustainable, equitable and prosperous future for all. Let's continue building together.

Sustainability Management
Banco de Occidente

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

1. Assurance Letter

Señores
Accionistas y demás grupos de interés de
Banco de Occidente S.A.
Bogotá D.C., Colombia

INFORME DE ASEGURAMIENTO LIMITADO INDEPENDIENTE

Alcance

Hemos sido contratados por la Dirección de Banco de Occidente S.A. (en adelante "El Banco") para llevar a cabo un trabajo de aseguramiento limitado sobre la información detallada en el Anexo A (en adelante, información objeto de aseguramiento), incluida en el Informe de Gestión y Sostenibilidad para el año terminado el 31 de diciembre de 2024.

Nuestro compromiso de aseguramiento limitado se realizó únicamente en relación con la información seleccionada de sostenibilidad incluida en el Anexo A. Nuestro informe de aseguramiento no se extiende a información de períodos anteriores ni a otra información no incluida en el Informe de Gestión y Sostenibilidad 2024, ni a otra información relacionada a dicho Informe que pudiera contener imágenes, audios o videos.

Criterios aplicados por Banco de Occidente S.A.

Los criterios utilizados por la administración de El Banco para preparar la información objeto de aseguramiento detallada en el Anexo A e incluida en el Informe de Gestión y Sostenibilidad 2024 fueron establecidos considerando los conceptos, requerimientos y principios de:

- Los estándares de la Global Reporting Initiative (GRI) 2021 en su opción de uso "Con referencia GRI".
- Los criterios definidos por El Banco para la metodología del proceso de análisis de doble materialidad vigente en 2024.
- Los criterios definidos por El Banco para los indicadores propios 2024.

Responsabilidades de la administración de Banco de Occidente S.A. sobre la información objeto de aseguramiento incluida en el Informe de Sostenibilidad 2024

La administración de El Banco es responsable por la elaboración y presentación de la información objeto de aseguramiento incluida en el Informe de Gestión y Sostenibilidad 2024, de acuerdo con los criterios mencionados en el párrafo anterior. Esta responsabilidad incluye el diseño, la implementación y el mantenimiento del control interno relevante para la preparación de la información objeto de aseguramiento que esté libre de errores materiales, ya sea debido a fraude o error.

Responsabilidades de BDO

Nuestra responsabilidad es expresar una conclusión de aseguramiento limitado sobre la información objeto de aseguramiento, con base en los procedimientos que hemos efectuado y la evidencia que hemos obtenido. Hemos llevado a cabo nuestro trabajo de aseguramiento limitado de acuerdo con los lineamientos de la Norma Internacional de Encargos de Aseguramiento ISAE3000 (Revisada), Encargos de Aseguramiento distintos de la Auditoría o de la Revisión de Información Financiera Histórica emitida por el *International Auditing And Assurance Standards Board* (IAASB).

Esta norma exige que concluyamos si ha llegado a nuestro conocimiento algún hecho que nos haga pensar que la declaración de la dirección no se presenta fielmente, en todos sus aspectos significativos. En un encargo de aseguramiento limitado, el profesional ejerciente lleva a cabo procedimientos (consistentes principalmente en realizar indagaciones a la dirección y a otras personas de la entidad, según proceda, y en aplicar procedimientos analíticos) y evalúa la evidencia obtenida.

Los procedimientos que realizamos se basaron en nuestro juicio profesional e incluyeron indagaciones, entendimiento y observación de los procesos realizados y evidencias, recálculos, inspección de documentos, procedimientos analíticos, evaluación de la idoneidad de los métodos de cuantificación y políticas de informes y acuerdo o conciliación con los registros subyacentes.

Documento Público

Dadas las circunstancias del compromiso, hemos realizado los siguientes procedimientos:

a) A través de indagaciones, se obtuvo una comprensión del entorno de control y sistemas de información de El Banco relevantes, pero no evaluamos el diseño de las actividades de control particulares ni obtuvimos evidencia sobre su implementación, ni probamos su efectividad operativa.

b) Entendimiento de las herramientas utilizadas para generar, agregar y reportar la información objeto de aseguramiento mediante indagaciones con los responsables de los procesos relacionados.

c) Entendimiento, indagación con los representantes delegados por la administración y verificación en sí, del proceso llevado a cabo por El Banco en 2024 para la elaboración / actualización de su análisis de doble materialidad vigente, incluida la participación de sus grupos de interés en este proceso.

d) Entrevistas con el personal de El Banco, para comprender su negocio y el proceso de preparación del Informe de Gestión y Sostenibilidad 2024.

e) Entrevistas con el personal de El Banco a nivel corporativo, responsables de la información a reportar, para comprender el proceso de recolección, consolidación y presentación de la información objeto de aseguramiento.

f) Comprobación de los criterios de cálculo y su aplicación adecuada, de acuerdo con las metodologías descritas en los criterios de los indicadores objeto de aseguramiento, según alcance indicado en el Anexo A.

g) Realización de procedimientos analíticos para respaldar la razonabilidad de los datos.

h) Comparación de la información presentada en el Informe de Gestión y Sostenibilidad con la información correspondiente a las fuentes subyacentes relevantes para determinar si la misma ha sido incluida en el Informe de Gestión y Sostenibilidad.

i) Análisis de los procesos de recolección y de control interno de los datos cuantitativos reflejados en el Informe, en cuanto a la confiabilidad de la información, utilizando procedimientos analíticos y pruebas de verificación con base en muestreos.

j) Lectura de la información incluida en el Informe de Gestión y Sostenibilidad, para compararla frente a los criterios definidos por los estándares GRI 1 - Fundamentos, GRI 2 - Contenidos Generales y GRI 3 -Temas Materiales aplicables según la declaración de uso definida por El Banco. Procedimiento efectuado con base en la versión del Informe de Gestión y Sostenibilidad 2024 suministrada por El Banco a BDO el día 21 de febrero de 2025.

k) Aplicación de pruebas sustantivas sobre una base selectiva aleatoria de la información objeto de aseguramiento, elaborada por la administración, para determinar los estándares e indicadores y corroborar que los datos se hayan medido, registrado, recopilado e informado adecuadamente a través de:

   i. Inspección de políticas y procedimientos establecidos por El Banco.
   ii. Inspección de documentos soporte de origen interno y externo.
   iii. Recálculos.
   iv. Comparaciones de los contenidos presentados por la Administración con lo establecidos en la sección de criterios de este informe.

En el Anexo A se detalla la información objeto de aseguramiento incluida en el alcance de nuestro trabajo.

Nuestro encargo de aseguramiento limitado se realizó solamente con respecto a la información objeto de aseguramiento incluida en el Anexo A, por el año terminado el 31 de diciembre de 2024; y no hemos realizado ningún procedimiento con respecto de años anteriores, proyecciones y metas futuras, o cualquier otro elemento de otra información incluida en el Informe de Gestión y Sostenibilidad por el año terminado el 31 de diciembre de 2024 y, por lo tanto, no expresamos una conclusión al respecto.

Los procedimientos aplicados en un encargo de aseguramiento limitado varían en cuanto a su naturaleza y momento de aplicación, y son de menor alcance que en el caso de un encargo de aseguramiento razonable y, en consecuencia, el nivel de fiabilidad obtenido en un encargo de aseguramiento limitado es sustancialmente inferior al que se habría obtenido de haberse realizado un encargo de aseguramiento razonable.

Documento Público

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

1. Assurance Letter

Consideramos que la evidencia obtenida es suficiente y apropiada para proveer una base para nuestra conclusión de aseguramiento limitado.

Independencia y gestión de calidad

Hemos cumplido con los requerimientos éticos y de independencia del código de ética profesional del contador público emitido por el International Ethics Standard Board for Accountants (IESBA), el cual se basa en los principios de integridad, objetividad, competencia profesional y debido cuidado, confidencialidad y comportamiento profesional.

Nuestra firma BDO Audit S.A.S BIC aplica el International Standard on Quality Management ("ISQM") 1 y, por lo tanto, mantiene un sistema integral de control de calidad que incluye políticas y procedimientos documentados relacionados con el cumplimiento de requisitos éticos, estándares profesionales y requisitos de ley y regulaciones aplicables.

Limitaciones inherentes del encargo de aseguramiento

La información de sostenibilidad seleccionada está sujeta a incertidumbre inherente debido al uso de información no financiera, la cual es objeto de mayores limitaciones inherentes que la información financiera dada la naturaleza de los métodos utilizados para determinar, calcular, hacer muestreos o estimar dicha información. En la preparación de la información selecciona la entidad efectúa interpretaciones cualitativas sobre la relevancia, la materialidad y la exactitud de la información que están sujetas a supuestos y juicios.

Conclusión del aseguramiento limitado

Basándonos en los procedimientos que hemos realizado y en las evidencias que obtuvimos, no ha llegado a nuestro conocimiento ninguna situación que nos lleve a pensar que la información objeto de aseguramiento indicada en el Anexo A de este informe, y que a su vez fue incluida en el Informe de Gestión y Sostenibilidad para el año terminado el 31 de diciembre de 2024 de Banco de Occidente S.A., no ha cumplido de conformidad con lo establecido en la sección de criterios de este informe.

Restricción del uso del Informe

Nuestro informe se emite exclusivamente con el propósito expuesto en el primer párrafo y no debe utilizarse para ningún otro propósito ni ser distribuido a otras partes por separado. Este informe se refiere solamente a los asuntos mencionados en las secciones precedentes y la información objeto de aseguramiento incluida en el Anexo A y no se extiende a ninguna otra información financiera y no financiera incluida en el Informe de Gestión y Sostenibilidad de Banco de Occidente S.A. para el año terminado el 31 de diciembre de 2024, ni a sus estados financieros, tomados en su conjunto.

Planes de acción

BDO Audit S.A.S. BIC entrega a Banco de Occidente S.A., a través de un informe adicional, las recomendaciones de acción para la futura preparación del Informe de Gestión y Sostenibilidad, que no modifican la conclusión expresada en este informe, buscando buscan fortalecer el proceso de construcción, gestión, medición, revisión, reporte y comunicación de los indicadores de sostenibilidad de El Banco.

Luis Fernando Gomez Gonzalez

Firmado digitalmente por Luis Fernando Gomez Gonzalez
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Luis Fernando Gómez González
Socio de Auditoría y Aseguramiento
Contador Público TP 144.355

Miembro de
BDO Audit S.A.S BIC
Bogotá, 27 de febrero de 2025.

Documento Público

ANEXO A

Alcance del aseguramiento limitado

A continuación, se detallan los estándares GRI, los indicadores definidos por la Administración como propios y la información del proceso de análisis de doble materialidad de Banco de Occidente S.A. cubierta con este aseguramiento.

Estos criterios forman parte integral de nuestro informe de aseguramiento limitado independiente sobre el Informe de Gestión y Sostenibilidad de Banco de Occidente S.A. por el periodo comprendido entre el 1 de enero al 31 de diciembre de 2024.

Estándar GRI	Descripción
2-21	Ratio de compensación total anual
2-26	Mecanismos para solicitar asesoramiento y plantear inquietudes
201-1	Valor económico directo generado y distribuido
302-1	Consumo energético dentro de la organización.
303-5	Consumo de agua (m3).
305-1	Emisiones directas de GEI (alcance 1).
305-2	Emisiones Indirectas de GEI - Alcance 2 (Método locación) y (Método Market).
305-3	Otras emisiones indirectas de GEI - Alcance 3.
306- 4	Residuos no destinados a eliminación.
306- 5	Residuos destinados a eliminación.
401-1	Nuevas contrataciones de empleados y rotación de personal
405-2	Ratio entre el salario básico y la remuneración de mujeres y de hombres
404-3	% empleados que reciben evaluaciones periódicas del desempeño y desarrollo profesional
403-9	Lesiones por accidente laboral – colaboradores y contratistas
403-10	Dolencias y enfermedades laborales – colaboradores y contratistas

Propios	Descripción
Propio	Índice de Severidad de Accidentalidad - colaboradores y contratistas
Propio	Índice de Frecuencia de Accidentalidad - colaboradores y contratistas
Propio	Ausentismo - colaboradores y contratistas
Propio	Transformación Social y Acceso a Agua Potable en La Guajira (UNICEF)
Propio	Índice de Recomendación de Clientes (NPS)

Análisis de materialidad	Descripción
Actualización y avances en 2024 sobre los resultados del análisis de doble materialidad año 2023	Proceso metodológico diseñado e implementado por Banco de Occidente para el análisis de doble materialidad (llevado a cabo en 2023) con una vigencia de dos (2) años. Para el reporte 2024, BDO realizó su verificación mediante indagación e inspección documental sobre los avances en la integración de los impactos, riesgos y oportunidades priorizados en la doble materialidad, con los riesgos estratégicos corporativos, así como la conexión de los temas materiales con la estrategia de negocio.

Documento Público

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

2. ESG Chart

General Contents — GRI 2						
# Page	**Standard**	**Indicator**	**Response to the indicator (Report section)**	**External Verification 2024**	**Material Issue**	**Omission**
19	GRI	2-1 Organizational Details	At Banco de Occidente we are a private financial institution. No government entity or organization related to state activities owns an equity interest in our company. Our main shareholder is Grupo Aval Acciones y Valores S.A., which as of December 31, 2023 had a 72.27% stake.		→ Ethical governance → Leadership committed to ESG issues	
	GRI	2-2 Entities included in the Sustainability reporting.	The information reported focuses on Banco de Occidente S.A. Although we mention our affiliates (FiduOccidente, Banco de Occidente de Panamá, Occidental Bank Barbados and Nexa BPO) in business performance, the specific sustainability data does not include these entities. Currently, we have not defined the limits and coverage of environmental and social indicators, including specific climate indicators in our affiliates. We are in the process of evaluating how to include this information in future reports to ensure greater clarity and transparency in the scope of our sustainability reporting.		→ Ethical governance	
	GRI	2-3 Reporting period, frequency and point of contact.	2024 Annual Daniel Lopez – dflopezs@bancodeoccidente.com.co		→ Ethical governance	
	GRI	2-4 Updating information.	For 2024, we updated our historical emissions for the period 2022-2023. With respect to other matters, we do not make or report significant or material changes to previously disclosed information.		→ Ethical governance → Regulatory and legal compliance	
9	GRI	2-5 External Verification	This report has been verified by BDO Colombia S.A.S., under a limited scope of assurance. The details of this verification can be found in the assurance letter, included in the annexes of the 2024 Management and Sustainability Report.		→ Regulatory and legal compliance → Ethical governance	
11	GRI	2-6 Activities, value chain and other business relationships	The characterization of our supply chain was published in the 2022 Sustainability Report, on pages 307 to 309. It was not included in the 2024 Report, as it is currently in the process of being reviewed and updated.		→ Responsible supply chain management	
19	GRI	2-7 Total contributors by gender and region	Of our 6,695 employees, 6,197 have an indefinite term contract and 498 have a fixed-term contract. In addition, we have 325 trainees and interns, for a total of 7,020 employees, all full-time. In addition, the total number of temporary and outsourced employees amounts to 2,224, and we do not register personnel under a non-guaranteed hours scheme.		→ Diversity and inclusion	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

General Contents — GRI 2						
# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
19	GRI	2-8 Non-Employees	In 2024, we have 2,224 outsourced employees who perform various functions, including telephone sales management and digital channels, technology support, general services, and security. Their contractual relationship is through third parties specialized in each area.		→ Diversity and inclusion	
19	GRI	2-9 Structure and composition of governance	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance	
26	GRI	2-10 Nomination and selection of the highest governing body	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance	
33	GRI	2-11 President of the highest governing body	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance	
33	GRI	2-12 Role of the highest governing body in overseeing impact management	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance → Risk management	
34	GRI	2-13 Delegation of responsibility for impact management	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance	
33	GRI	2-14 Role of the highest governing body in the preparation of sustainability reports	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance → Leadership committed to ESG issues	
37	GRI	2-15 Conflicts of interest	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance → Regulatory and legal compliance	
38	GRI	2-16 Communicating Critical Concerns	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance → Industrial relations	
38	GRI	2-17 Collective knowledge of the highest governing body	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance → Leadership committed to ESG issues	
38	GRI	2-18 Evaluation of the performance of the highest governing body	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Ethical governance → Leadership committed to ESG issues	

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General Contents — GRI 2

# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
39	GRI	2-19 Remuneration Policies	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Labor relations → DDiversity and inclusion	
39	GRI	2-20 Process for determining compensation	Chapter: Sound Governance and Ethical Leadership, Corporate Governance Structure		→ Labor relations → Diversity and inclusion	
	GRI	2-21 Annual Total Compensation Ratio	At Banco de Occidente, we promote a competitive and equitable compensation structure, aligned with the best practices in the market and our commitment to sustainability. Detailed information on this indicator is available on our sustainability microsites.	x	→ Labor relations → Diversity and inclusion	
11	GRI	2-22 Declaration on the Sustainable Development Strategy	Letter from the President		→ Ethical governance → Leadership committed to ESG issues	
122	GRI	2-23 Policy commitments	Sustainability Chapter: Creating Shared Value; ESG Strategy and its Impact		→ Ethical governance → Leadership committed to ESG issues	
122	GRI	2-24 Mainstreaming commitments and policies	Sustainability Chapter: Creating Shared Value; ESG Strategy and its Impact		→ Ethical governance → Regulatory and legal compliance	
50	GRI	2-25 Processes to remediate negative impacts	Chapter: Strong Governance and Ethical Leadership, Compliance and Transparency		→ Risk management → Comprehensive protection of human rights	
53	GRI	2-26 Mechanisms for seeking advice and raising concerns	Chapter: Strong Governance and Ethical Leadership, Compliance and Transparency	x	→ Ethical governance	
	GRI	2-27 Compliance with Laws and Regulations	With respect to litigation and judicial or administrative proceedings of the Issuer, we only report those cases of non-compliance that are significant for the organization, as established in Circular 012 of the Finance Superintendence.		→ Regulatory and legal compliance	
55	GRI	2-28 Membership in associations	Detail of the main contributions Asobancaria: active participation in regulatory issues and sustainability of the financial sector $745,679,308 ANIF: support in the analysis of economic and financial policies: $231,094,800 ANDI: collaboration in competitiveness and business development initiatives: $179,481,000 Total increase in contributions and expenses: $1,156,255,108		→ Ethical governance	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

General Contents — GRI 2

# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
56	GRI	2-29 Stakeholder engagement approach	Sustainability Chapter: Creating Shared Value; ESG Strategy and its Impact		→ Labor relations → Financial inclusion	
19	GRI	2-30 Collective Bargaining Agreements	Chapter Introduction: Our Bank and its Commitment; About Us.		→ Labor relations	

General Contents — GRI 3

# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
122	GRI	3-1 Process for Determining Material Issues	Sustainability Chapter: Creating Shared Value; Materiality Analysis. Environmental Dimension: 1. Financed emissions: Action for the Planet; Financed Emissions 2. Climate risk management; Annex 3 - TCDF Report. 3. Direct Emissions: Action for the Planet; Emissions Management 4. Protection of biodiversity and ecosystems; Action for the Planet; Biodiversity and Ecosystem Conservation. 5. Waste and materials management; Action for the Planet; 6. Energy efficiency: Action for the Planet; Energy. 7. Operational eco-efficiency: Action for the Planet; Carbon Footprint; Energy. Social Dimension: 1. Social Investment: Empowering People and Communities; Social Investment 2. Financial inclusion: Empowering people and communities; Commitment to Our Customers. 3. Respect for human rights; Empowering People and Communities; Human rights. 4. Memorable Customer Experience: Empowering People and Communities; Commitment to Our Customers. 5. Satisfactory financial solutions: Responsible Growth and Comprehensive Risk Management; We promote sustainable businesses. 6. Human Development: Empowering People and Communities; Human Capital and Talent Management. 7. Labor Relations: Empowering People and Communities; Talent Well-being. 8. Diversity and inclusion: Empowering People and Communities; Diversity, Equity and Inclusion. 9. Financial Education: Empowering People and Communities; Commitment to Our Customers.		→ Leadership committed to ESG issues	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

General Contents — GRI 3						
# Page	**Standard**	**Indicator**	**Response to the indicator (Report section)**	**External Verification 2024**	**Material Issue**	**Omission**
122	GRI	3-1 Process for Determining Material Issues	Dimension of Government: 1. Ethical governance. Sound Governance and Ethical Leadership; Corporate Governance Structure 2. Regulatory compliance. Sound Governance and Ethical Leadership; Compliance and transparency 3. Responsible Marketing: Responsible Growth and Comprehensive Risk Management; Digital Transformation. 4. Technology and digital transformation. Responsible Growth and Comprehensive Risk Management; Digital Transformation and Cybersecurity 5. Information security, cybersecurity and system availability; Digital Transformation and Cybersecurity. 6. Responsible Supply Chain Management: Empowering People and Communities; Commitment to Our Customers. 7. ESG Leadership: Sustainability - Creating Shared Value. 8. Profitable Growth: Responsible Growth and Comprehensive Risk Management; Financial Outlook and Stock Market Performance. 9. Sustainable Finance: Responsible Growth and Comprehensive Risk Management; We promote sustainable businesses 10. Risk Management: Responsible Growth and Comprehensive Risk Management; Strategic management of financial and non-financial risks.		→ Leadership committed to ESG issues	
122	GRI	3-2 List of material topics	Sustainability Chapter: Creating Shared Value; Materiality Analysis.		→ Leadership committed to ESG issues	
122	GRI	3-3 Handling of material issues	Sustainability Chapter: Creating Shared Value; Materiality Analysis.		→ Risk management → Leadership committed to ESG issues	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators

# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
64	GRI	201-1 Direct Economic Value Generated and Distributed	Chapter on Responsible Growth and Comprehensive Risk Management; Financial outlook and stock market performance. Change in the ROI Methodology: to ensure compliance with the requirements of the Dow Jones Sustainability Index (DJSI), we made an update to the formula used to calculate the Return on Investment in Human Capital (HC-ROI). In this new methodology, we make sure to: Total income: includes the total income received by the company before making any deductions, including interest and valuation income, income from commissions and fees, net income from financial assets or liabilities held for trading, and other net income. Total operating expenses: are reported in line with accepted accounting and financial reporting standards, including general administrative expenses, depreciation and amortization expenses, personnel expenses, interest and similar expenses, commission and fee expenses, and other operating expenses. Total employees-related expenses: Considers all labor costs, including salaries, benefits, training programs, pensions, and severance payments. Given this adjustment in the methodology, the historical data have been recalculated, which has generated changes in the previously reported values. HC ROI result recalculated for the last five years is as follows: 2020: 30.208; 2021: 3.99; 2022: 3.43; 2023: 3.65; 2024: 3.91. It is observed that in 2020 there was a significantly high value compared to the following years. This was related to extraordinary factors, such as financial optimization strategies, impacts derived from the pandemic and/or structural changes in the bank. From 2021 onwards, the HC ROI stabilizes in a more consistent range, with a decline in 2022 (3.43) and a gradual recovery in subsequent years (3.65 in 2023 and 3.91 in 2024). This behavior demonstrates a positive trend in the efficiency of the use of human capital, which we highlight for improvements in productivity, optimization of labor costs and the strengthening of human talent strategies. This analysis allows us to have a clearer view of the impact of human capital on the bank's profitability, ensuring alignment with international sustainability standards.	x	→ Financial stability and profitable growth	
	GRI	201-2 Financial Implications and Other Risks and Opportunities Arising from Climate Change	In our commitment to the disclosure of the TCFD framework, we have included in that report the financial implications and other risks and opportunities arising from climate change.		→ Climate Risk Management	
59	GRI	203-2 Significant Indirect Economic Impacts	Chapter on Responsible Growth and Comprehensive Risk Management; Financial Outlook and Stock Market Performance		→ Development of the regions	
	GRI	204-1 Proportion of Expenditure on Local Suppliers	The total expenditure of suppliers for 2024 was $1,247,997,144,780 MM. Highlighting that 99% of them are local.		→ Responsible supply chain management	
	GRI	415-1 Contribution to political parties and/or representatives	During 2024, we did not make financial contributions or provided support to political parties and representatives. This stance reflects our commitment to ethics, fairness and integrity in all our operations, as well as our respect for democratic processes and the need to maintain a clear separation between politics and business.		→ Ethical governance	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	**Standard**	**Indicator**	**Response to the indicator (Report section)**	**External Verification 2024**	**Material Issue**	**Omission**
102	SASB	FN-CB-410a.2 Description of the approach for incorporating environmental, social and corporate governance (ESG) factors into credit analysis	Chapter on Responsible Growth and Comprehensive Risk Management; Environmental and Social Risks (SARAS); We promote sustainable businesses.		→ Sustainable Finance	
99	SASB	FN-CB-550a.2. Description of the approach to incorporate the results of mandatory and voluntary testing into capital adequacy planning, long-term strategy, and other business activities	Chapter: Responsible Growth and Comprehensive Risk Management; Endurance tests		→ Financial stability and profitable growth	
114	Propio	BoO-1 Total Digital Sales	Chapter: Responsible Growth and Comprehensive Risk Management; Digital transformation and cybersecurity		→ Financial stability and profitable growth	
47	GRI	205-1 Operations Assessed on the Basis of Corruption-Related Risks	Chapter: Sound Governance and Ethical Leadership; Compliance and Transparency		→ Ethical governance	
47	GRI	205-2 Communication and Training on Anti-Corruption Policies and Procedures	Chapter: Sound Governance and Ethical Leadership; Compliance and Transparency		→ Ethical governance	
47	GRI	205-3 Confirmed Corruption Incidents and Actions Taken	Chapter: Sound Governance and Ethical Leadership; Compliance and Transparency		→ Ethical governance → Regulatory and Legal Compliance	
44	GRI	206-1 Legal actions related to unfair competition and monopolistic practices and against free competition	In 2024, no cases in which fines have been imposed on the bank were known or managed, likewise there are no cases of unfair competition or monopolistic practices.		→ Regulatory and Legal Compliance	
79	GRI	207-1 Tax Approach	Chapter: Responsible Growth and Comprehensive Risk Management; Fiscal and Tax Management		→ Ethical governance → Regulatory and Legal Compliance	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	**Standard**	**Indicator**	**Response to the indicator (Report section)**	**External Verification 2024**	**Material Issue**	**Omission**
79	GRI	207-2 Fiscal Governance, Control, and Risk Management	Chapter: Responsible Growth and Comprehensive Risk Management; Fiscal and Tax Management		→ Ethical governance → Risk management	
79	GRI	207-3 Stakeholder Engagement and Management of Tax Concerns	Chapter: Responsible Growth and Comprehensive Risk Management; Fiscal and Tax Management		→ Ethical governance → Regulatory and legal compliance	
79	GRI	207-4 Country-by-Country Reporting	In our 2024 financial statements, we detail income tax following the guidelines of IAS 12 and IAS 1. However, we also assume other taxes and mandatory contributions for our operation, which are consolidated in different areas. These include the industry and commerce tax, the GMF, the contribution to the Finance Superintendence, parafiscal contributions, among others.		→ Ethical governance	
	SASB	FN-CB-230a.1 (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of affected account holders	In 2024 we had an incident related to the violation of data privacy, in this case, a complaint was received from a customer who found on the Scribd platform a document linked to the Bank that contained 119 records, of which 29 corresponded to active customers, after receiving the alert, an investigation was carried out by the security area, and there was no evidence of fraud linked to these clients, the document was removed from the platform and a complaint was filed with the Attorney General's Office against the former official involved, who worked in one of our affiliates, this incident was handled in accordance with our security protocols, minimizing the impact and guaranteeing the protection of our clients' information.		→ Information security, cybersecurity and system availability	
	SASB	FN-CB-230a.2 Description of the approach to identifying and addressing data security risks	At the Bank, we identify and prioritize critical services through the Business Impact Analysis (BIA) exercise, which allows us to manage the risks associated with the processes and technologies involved, developing action plans that seek to reduce residual risk and achieve the acceptable level of risk, we have an information security and cybersecurity governance model, supported by policies and procedures, such as the Homogeneous Information Protection Standard (#AVBO. NOSI. SI.005), and we ensure compliance through tools such as DLP (Data Loss Prevention), IAM (Identity & Access Management) and PAM (Privileged Access Management).		→ Information security, cybersecurity and system availability	
	SASB	FN-CB-510a.1 Total amount of monetary losses resulting from court proceedings related to fraud, insider trading, antitrust, unfair competition, market manipulation, malpractice or other related financial industry laws or regulations	During 2024 we had 43 cases related to fraud against customers (electronic fraud that affected account deposits and TC, consumption not recognized with TC and payment of checks with a forged signature), in which we were convicted or entered into conciliatory agreements for $387,707,538.		→ Regulatory and legal compliance	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
53	SASB	FN-CB-510a.2 Description of Whistleblowing Policies and Procedures	Chapter: Sound Governance and Ethical Leadership; Compliance and Transparency		→ Ethical governance	
101	SASB	FN-CB-550a.1 Global Systemically Important Bank (G-SIB) Assessment Score, by Category	Chapter: Responsible Growth and Comprehensive Risk Management; G-SIB Score		→ Financial stability and profitable growth	
139	GRI	302-1 Energy Consumption Within the Organization	• We report the total energy consumption in MWh, which is equivalent to 40613,112 GJ. • Gasoline and diesel consumption (non-renewable fuels): 130.12 MwH/ 468,432 GJ • Electricity consumption: 10,974.28 MhW / 39507.408 GJ	x	→ Energy efficiency	
139	GRI	302-3 Energy Intensity	Chapter: Action for the Planet; Energy		→ Sustainable use of resources	
139	GRI	302-4 Reducing Energy Consumption	Chapter: Action for the Planet; Energy		→ Emissions Management	
140	GRI	303-5 Water Consumption	Chapter: Action for the Planet; Water	x	→ Emissions Management	
136	GRI	305-1 Direct GHG Emissions – Scope 1	Chapter: Action for the Planet; Carbon Footprint. • Calculation method: application of the GHG Protocol in a calculator designed for internal use. • GHGs included: CO2, CH4, N2O, SF6, HCFs and HCFCs • Biogenic CO2 emissions: 1.63 Ton CO2 eq. • Sources of emission factors: UPME, FECOC, IPCC, GHG Protocol, EPA, government agencies.	x	→ Emissions Management	
136	GRI	305-2 Direct GHG Emissions – Scope 2	Chapter: Action for the Planet; Carbon Footprint. • Calculation method: application of the GHG Protocol in a calculator designed for internal use • GHGs included: CO2, CH4, N2O, SF6, HCFs and HCFCs. • Location-based method: UPME, FECOC, IPCC, GHG Protocol, EPA, government agencies. • Base year: 2022	x	→ Emissions Management	
136	GRI	305-3 Direct GHG Emissions – Scope 3	Chapter: Action for the Planet; Carbon Footprint.	x	→ Emissions Management	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	**Standard**	**Indicator**	**Response to the indicator (Report section)**	**External Verification 2024**	**Material Issue**	**Omission**
136	GRI	305-4 GHG Emissions Intensity	Chapter: Action for the Planet; Carbon Footprint.		→ Emissions Management	
136	GRI	305-5 GHG Emission Reductions	Chapter: Action for the Planet; Carbon Footprint. **Restatement:** We establish the year 2022 as our issuance baseline at Banco de Occidente, due to the stability and verification of the data obtained for that period. For the years 2022 and 2023, we have carried out a Re-expression of the information presented in our sustainable management report since the measurement of our carbon footprint was verified and audited by ICONTEC, which led us to a recalculation of the emissions generated in Scope 1 and 3. For this reason, the information is subject to a recalculation that considers data from the IPCC's AR6 supplementary material, related to the confirmation of the Global Warming Potential for Scope 1 (refrigerants). In addition, Resolution 40447 of 2022 of the Ministry of Mines and Energy updates the fuel blending percentages in motor gasoline and anhydrous ethanol from 90% to 96%, which modifies the Scope 1 (fuels) and Scope 3 (outsourced transportation) information. This recalculation increased our emissions of: **Scope 1:** 1,540.20 for 2022 and 1,379.49 for 2023. **Scope 3:** 6,103.38 for 2022 and 4,023.15 for 2023. **Total emissions:** a total of 9,039.84 emissions in 2022 and 7,395.29 emissions in 2023.		→ Emissions Management	
141	GRI	306-3 Waste generated	Chapter: Action for the Planet; Waste		→ Material waste management	
141	GRI	306-4 Waste not intended for disposal	Chapter: Action for the Planet; Waste	x	→ Material waste management	
141	GRI	306-5 Waste for disposal	Chapter: Action for the Planet; Waste	x	→ Material waste management	
108	Propio	BdO-2 Occiauto Planeta Azul	Chapter on Responsible Growth and Comprehensive Risk Management; Environmental and Social Risks (SARAS); We promote sustainable businesses.		→ Sustainable Finance	
108	Propio	BdO-3 Green Builder Line	Chapter on Responsible Growth and Comprehensive Risk Management; Environmental and Social Risks (SARAS); We promote sustainable businesses.		→ Sustainable Finance	
108	Propio	BdO-4 Planeta Azul Housing	Chapter on Responsible Growth and Comprehensive Risk Management; Environmental and Social Risks (SARAS); We promote sustainable businesses.		→ Sustainable Finance	
108	Propio	BdO-5 Social Sustainable Line	Chapter on Responsible Growth and Comprehensive Risk Management; Environmental and Social Risks (SARAS); We promote sustainable businesses.		→ Sustainable Finance	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
108	Propio	BdO-6 Development Portfolio	Chapter on Responsible Growth and Comprehensive Risk Management; Environmental and Social Risks (SARAS); We promote sustainable businesses.		→ Sustainable Finance	
138	Propio	BdO-7 Tons of CO2 avoided by Sustainable Mobility	Chapter: Action for the Planet; Sustainable Mobility		→ Emissions Management	
	GRI	308-1 New Suppliers That Have Passed Screening Filters According to Environmental Criteria	78% suppliers that have passed selection filters according to environmental criteria, equivalent to 547 suppliers.		→ Responsible supply chain management	
168	GRI	401-1 Hiring of new employees and staff turnover	Bogota: • Hiring of employees <30 years old: 25.74% / #385 • Hiring of employees between 30-50 years old: 6.59% / #93 • Hiring of employees >50 years old: 3.32 % / #12 • Hiring of women: 15.41% / #298 • Hiring of men: 14.39% / #192 • Total Hiring Junior Management Level Low: 1.89% / #5 • Middle Management Level Hiring: 12.90% / #4 • Senior or Senior Management Level Hiring: 28.57% / #2 • Non-Managerial Level Hiring: 16.16% / #479 • Total employees turnover <30 years: 17.71% / #265 • Voluntary employees turnover <30 years old: 13.84% / #207 • Total turnover of employees between 30-50 years old: 8.43% / #119 • Voluntary turnover of employees between 30-50 years old: 6.02% / #85 • Total employees turnover >50 years: 9.70% / #35 • Voluntary employees turnover >50 years old: 6.93% / #25 • Total female turnover: 13.39% / #259 • Voluntary female turnover: 10.24% / #198 • Total male turnover: 11.99% / #160 • Voluntary Male Turnover: 8.92% / #119 • Total Turnover Junior Low Management Level: 6.06% / #16. • Voluntary Turnover Junior Management Level Low: 2.65% / #7 • Total Turnover Middle Management Level: 3.23% / #1 • Voluntary Turnover Middle Management Level: 3.23% / #1 • Total Turnover Senior or Senior Management Level: 0% / #0 • Voluntary Turnover Senior or High Management Level: 0% / #0 • Total Turnover Non-Managerial Level: 13.59% / #403 • Voluntary Turnover Non-Managerial Level: 10.42% / #309 • Wanted and unwanted withdrawals: 736.	x	→ Human Development → Diversity and Inclusion	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators							
# Page	Standard	Indicator	Response to the indicator (Report section)		External Verification 2024	Material Issue	Omission
168	GRI	401-1 Hiring of new employees and staff turnover	Cali: • Hiring of employees <30 years old: 27.21% / #277 • Hiring of employees between 30-50 years old: 5.05% / #59 • Hiring of employees >50 years old: 0.81% / #2 • Hiring of women: 12.91% / #178 • Hiring of men: 15.17% / 160 • Total Hiring Junior Management Level Low: 1.40% / #3 • Middle Management Level Hiring: 0.0% / #0 • Senior or Senior Management Level Hiring: 16.67% / #1 • Non-Managerial Level Hiring: 15.33% / #334 • Total employees turnover <30 years: 11.79% / # 120 • Voluntary employees turnover <30 years old: 9.33% / #95 • Total turnover of employees between 30-50 years old: 6.16% / #72 • Voluntary turnover of employees between 30-50 years old: 4.37% / #51	• Total employees turnover >50 years: 5.65% / #14 • Voluntary turnover of employees >50 years old: 2.42% / #6 • Total women's turnover: 6.60% / #91 • Voluntary Female Turnover: 4.93% / #68 • Total male turnover: 10.90% / #115 • Voluntary male turnover: 7.96% / #84 • Total Turnover Junior Management Level Low: 2.79% / #6 • Voluntary Turnover Junior Low Management Level: 2.23% / #5 • Total Turnover Middle Management Level: 0.0% / #0 • Voluntary Turnover Middle Management Level: 0.0% / #0 • Total Turnover Senior or Senior Management Level: 0.0% / #0 • Voluntary Turnover Senior or Senior Management Level: 0.0% / #0 • Total Turnover Non-Managerial Level: 9.04% / #197 • Voluntary Turnover Non-Managerial Level: 6.75% / #147 • Wanted and unwanted withdrawals: 358	x	→ Human Development → Diversity and Inclusion	
168	GRI	401-1 Hiring of new employees and staff turnover	Medellin: • Hiring of employees <30 years old: 35.43% / #79 • Hiring of employees between 30-50 years old: 7.16% / #28 • Hiring of employees >50 years old: 0.86% / #1 • Hiring of women: 15.81% / #71 • Hiring of men: 13.17% / #37 • Total Hiring Junior Management Level Low: 0.0% / #0 • Middle Management Level Hiring: 0.0% / #0 • Senior or Senior Management Level Hiring: 0.0% / #0 • Non-Managerial Level Hiring: 16.0% / #108 • Total employees turnover <30 years old: 16.14% / #36 • Voluntary employees turnover <30 years old: 9.42% / #21 • Total turnover of employees between 30-50 years old: 7.42% / #29 • Voluntary turnover of employees between 30-50 years old: 4.35% / #17	• Total employees turnover >50 years: 7.76% / #9 • Voluntary employees turnover >50 years old: 6.03% / #7 • Total female turnover: 11.36% / #51 • Voluntary female turnover: 7.13% / #32 • Total Male Turnover: 8.19% / #23 • Voluntary male turnover: 4.63% / #13 • Total Turnover Junior Management Level Low: 3.70% / #2 • Voluntary Turnover Junior Management Level Low: 1.85% / #1 • Total Turnover Middle Management Level: 0.0% / #0 • Voluntary Turnover Middle Management Level: 0.0% / #0 • Total Turnover Senior or Senior Management Level: 0.0% / #0 • Voluntary Turnover Senior or Senior Management Level: 0.0% / #0 • Total Turnover Non-Managerial Level: 10.96% / #74 • Voluntary Turnover Non-Managerial Level: 6.52% / #44 • Wanted and unwanted withdrawals: 119	x	→ Human Development → Diversity and Inclusion	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators							
# Page	Standard	Indicator	Response to the indicator (Report section)		External Verification 2024	Material Issue	Omission
168	GRI	401-1 Hiring of new employees and staff turnover	Barranquilla: • Hiring of employees <30 years old: 24.90% / #63 • Hiring of employees between 30-50 years old: 2.61% / #7 • Hiring of employees >50 years old: 4.48% / #3 • Hiring of women: 12.41% / #49 • Hiring of men: 12.44% / #24 • Total Hiring Junior Management Level Low: 0.0% / #0 • Middle Management Level Hiring: 0.0% / #0 • Senior or Senior Management Level Hiring: 0.0% / #0 • Non-Managerial Level Hiring: 13.47% / #73 • Total employees turnover <30 years: 20.95% / #53 • Voluntary employees turnover <30 years old: 11.86% / #30 • Total turnover of employees between 30-50 years old: 7.84% / #21 • Voluntary turnover of employees between 30-50 years old: 4.10% / #11	• Total employees turnover >50 years: 16.42% / #11 • Voluntary employees turnover >50 years old: 7.46% / #5 • Total female turnover: 13.42% / #53 • Voluntary Female Turnover: 8.10% #32 • Total Male Turnover: 16.58% / #32 • Voluntary male turnover: 7.25% / #14 • Total Turnover Junior Management Level Low: 2.22% / #1 • Voluntary Turnover Junior Management Level Low: 2.22% / #1 • Total Turnover Middle Management Level: 0.0% / #0 • Voluntary Turnover Middle Management Level: 0.0% / #0 • Total Turnover Senior or Senior Management Level: 0.0% / #0 • Voluntary Turnover Senior or Senior Management Level: 0.0% / #0 • Total Turnover Non-Managerial Level: 15.50% / #84 • Voluntary Rotation Non-Managerial Level: 8.30% / #45 • Wanted and unwanted withdrawals: 131	x	→ Human Development → Diversity and Inclusion	
168	GRI	401-1 Hiring of new employees and staff turnover	General BdO: • Hiring of employees <30 years old: 26.89% / #804 • Hiring of employees between 30-50 years old: 5.78% / #187 • Hiring of employees >50 years old: 2.27% / #18 • Hiring of women: 14.34% / #596 • Hiring of men: 14.43% / #413 • Total Hiring Junior Management Level Low: 1.38% / #8 • Middle Management Level Hiring: 5.88% / #4 • Senior or Senior Management Level Hiring: 23.08% / #3 • Non-Managerial Level Hiring: 15.63% / #994 • Total employees turnover <30 years: 15.85% / #474 • Voluntary employees turnover <30 years old: 11.81% / #353 • Total turnover of employees between 30-50 years old: 7.44% / #241 • Voluntary turnover of employees between 30-50 years old: 5.06% / #164	• Total employees turnover >50 years: 8.71% / #69 • Voluntary employees turnover >50 years old: 5.43% / #43 • Total female turnover: 10.92% / #454 • Voluntary Female Turnover: 7.94% / #330 • Total Male Turnover: 11.53% / #330 • Voluntary male turnover: 8.03% / #230 • Total Turnover Junior Management Level Low: 4.33% / #25 • Voluntary Turnover Junior Management Level Low: 2.42% / #14 • Total Turnover Middle Management Level: 1.47% / #1 • Voluntary Turnover Middle Management Level: 1.47% / #1 • Total Turnover Senior or Senior Management Level: 0.0% / #0 • Voluntary Turnover Senior or Senior Management Level: 0.0% / #0 • Total Turnover Non-Managerial Level: 11.92% / #758 • Non-Managerial Level Voluntary Turnover: 8.57% / #545 • Wanted and unwanted withdrawals: 1,344.	x	→ Human Development → Diversity and Inclusion	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
160	GRI	401-2 Benefits for Full-Time Contributors Not Provided to Part-Time or Temporary Contributors	Chapter Empowering People and Communities; Human Capital and Talent Management and Talent Well-being.		→ Human Development → Diversity and Inclusion	
160	GRI	401-3 Parental Leave	Chapter Empowering People and Communities; Talent Well-being.		→ Human Development → Diversity and Inclusion	
168	Propio	BdO-8 Filling vacancies with internal talent	Chapter Empowering People and Communities; Human Capital and Talent Management.		→ Labor relations	
160	Propio	BdO-9 Workforce Benefits and Extralegal Program (COP) Investment	Chapter Empowering People and Communities; Human Capital and Talent Management and Talent Well-being.		→ Labor relations	
179	GRI	403-1 Occupational Health and Safety Management System	Chapter Empowering People and Communities; Occupational Health and Safety.		→ Labor relations	
179	GRI	403-2 Hazard Identification, Risk Assessment, and Incident Investigation	At Banco de Occidente, we carry out a detailed analysis to identify the risks present in all areas of the organization, including occupational health and safety issues and environmental care. This process allows us to recognize potential threats and apply proactive measures to reduce their impact. Next, we carry out a comprehensive risk assessment, where we examine both the probability of occurrence and the possible consequences of each identified risk. With this information, we set priorities and design specific strategies to manage them effectively. In the event of an incident, we conduct a thorough investigation to identify the root causes and implement improvements that optimize our processes and procedures. We focus on avoiding the repetition of similar events and continuously strengthening our culture of safety and sustainability.		→ Labor relations	
179	GRI	403-3 Occupational Health Services	Chapter Empowering People and Communities; Occupational Health and Safety.		→ Labor relations	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
179	GRI	403-4 Employeese Engagement, Consultation, and Communication on Occupational Health and Safety	At Banco de Occidente, we are constantly striving to promote safe and healthy practices. The safety and health of all employees, regardless of their type of employment relationship with the organization, is a priority for us. To ensure the uniform application of these principles throughout our value chain, we have developed robust monitoring and evaluation mechanisms. Our employees also actively participate in the Occupational Health and Safety Management System (OH&S-MS). In Colombia, we have the COPASST (Joint Committee on Safety and Health at Work). This committee is formed in accordance with local regulations, guaranteeing the equitable representation of employer and employees, and meets monthly to address occupational safety issues, organize training, carry out safety inspections and lead prevention campaigns. Likewise, we continuously monitor key health and safety indicators, promoting a constant improvement of working conditions throughout our operation.		→ Labor relations	
179	GRI	403-5 Occupational Health and Safety Training of Employees	Chapter Empowering People and Communities; Occupational Health and Safety.		→ Labor relations	
179	GRI	403-6 Employees Health Promotion	From the Occupational Medicine Program, we have implemented a series of initiatives designed to promote the comprehensive well-being of our employees, focusing on both physical and mental health care. These activities seek to generate healthy habits that contribute to a more balanced life, thus improving their quality of life and work performance. Every year we carry out Health Week, an event that includes a series of activities focused on the promotion of healthy habits. Activities include: • Nutrition and healthy eating: workshops and advice on balanced eating. • Promotion of physical activity: group classes and recommendations for an active life. • Emotional well-being: talks and workshops on stress management, resilience and mental health. • Disease prevention: vaccination days and medical check-ups. • Trends in safety and occupational risks: training in ergonomics and risk prevention. This event takes place at our administrative headquarters nationwide and is complemented by virtual activities to ensure the participation of employees in regional offices. Recreational and cultural activities: throughout the year, we promote physical activity and emotional well-being through various recreational and cultural activities, coordinated by our work environment team. Some of these include: • Sports tournaments: beach volleyball competitions and corporate marathons. • Cultural and social activities: ecological walks, film screenings and volunteer days to involve employees in social and environmental actions. In addition, we have established agreements with various sports institutions, such as gyms and wellness centers, to offer our employees access to facilities and programs that allow them to maintain a regular exercise routine and improve their quality of life.		→ Labor relations	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
179	GRI	403-8 Coverage of the occupational health and safety management system	Our OSHMS covers all employees, regardless of their work modality, guaranteeing its application in all locations. In addition, it includes suppliers and contractors who carry out activities on mission or within our facilities, ensuring a safe environment aligned with our risk prevention policies.		→ Labor relations	
179	GRI	403-9 Workplace Injury	Chapter Empowering People and Communities; Occupational Health and Safety.	x	→ Labor relations	
179	GRI	403-10 Occupational ailments and diseases	Chapter Empowering People and Communities; Occupational Health and Safety.	x	→ Labor relations	
179	Own	BdO-10 Accident Severity Index	Chapter Empowering People and Communities; Occupational Health and Safety.	x	→ Labor relations	
179	Own	BdO-11 Accident Frequency Index	Chapter Empowering People and Communities; Occupational Health and Safety.	x	→ Labor relations	
179	Own	BdO-12 Absenteeism	Chapter Empowering People and Communities; Occupational Health and Safety.The target or reduction rate for 2024 is 13.30 overall and is broken down as follows: Employeesreduction rate: 13.27. Reduction rate for contractors: 35.39.	x	→ Labor relations	
166	GRI	404-1 Average hours of training per year per employees	Chapter Empowering People and Communities; Human Capital and Talent Management.	x	→ Human Development	
155	GRI	404-2 Employees Skills Development Programs and Transition Assistance Programs	Chapter Empowering People and Communities; Human Capital and Talent Management.		→ Human Development	
155	GRI	404-3 Percentage of employees who receive periodic evaluations of their performance and career development	Chapter Empowering People and Communities; Human Capital and Talent Management.	x	→ Human Development	
170	Own	BdO-13 Employees Welfare and Satisfaction - GPTW	Chapter Empowering People and Communities; Talent Well-being.		→ Diversity and inclusion	

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Specific Contents: GRI – SASB – External Circular 012 and Banco de Occidente's own indicators						
# Page	Standard	Indicator	Response to the indicator (Report section)	External Verification 2024	Material Issue	Omission
	GRI	405-1 Diversity of governing bodies and employees	Middle Management<30 years: 0 Middle Management30-50 years: 27 Middle Management>50 years: 41 Middle Management Women: 48 Middle Management Men: 20 Administrative<30 years: 724 Administrative 30-50 years: 1,386 Administrative>50 years: 264 Administrative staff women: 1,253 Administrative staff men: 1,121 Commercial<30 years: 108 Commercial30-50 years: 868 Commercial>50 years: 239 Commercial women: 452 Commercial men: 763 Operative<30 years: 2,153 Operative30-50 years: 959 Operative>50 years: 238 Operative women: 1,098 Operative men: 2,252		→ Diversity and inclusion	
	GRI	405-2 Ratio of basic salary to remuneration of women and men	We ensure that we maintain pay equity policies and professional development opportunities for all our employees. Quantitative information on the relationship between the salary and remuneration of women and men can be found on our sustainability microsites.	x	→ Labor relations	
	GRI	414-1 New suppliers that have passed selection filters according to social criteria	78% suppliers who have passed selection filters according to social criteria, equivalent to 547 suppliers.		→ Responsible management of the supply chain	
197	Own	BdO-15 Social Transformation and Access to Drinking Water in La Guajira (UNICEF)	Chapter Empowering People and Communities; Commitment to Communities; UNICEF.	x	→ Development of the regions	
199	Own	BdO-16 Social Initiatives – Donations (COP)	Chapter Empowering People and Communities; Commitment to Communities; Social Investment.		→ Development of the regions	
118	GRI	418-1 Fundamental Claims Concerning Violations of Customer Privacy and Loss of Customer Data	Chapter: Responsible Growth and Comprehensive Risk Management; Digital Transformation		→ Information security, cybersecurity and system availability	
192	SASB	FN-CB-240a.4 Number of participants in financial education initiatives for unbanked, underbanked, or underserved customers	Chapter Empowering People and Communities; Commitment to Our Customers.		→ Financial Education	
191	Own	BdO-17 Customer Recommendation Index (NPS)	Chapter Empowering People and Communities; Commitment to Our Customers.	x	→ Memorable customer experience	

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA



3. TCFD Report

TCFD
Task Force on Climate-related Financial Disclosures

Climate change represents one of the most significant challenges of our time, and at Banco de Occidente we are committed to playing an active role in mitigating it. This report, prepared in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), reflects our dedication to transparency and climate-related risk management. In this sense, we have developed a sustainability strategy that seeks to impact society, protect the environment and promote social development in the territories in which we operate.

The TCFD Initiative is a framework of recommendations designed to promote the disclosure of climate-related financial information. It seeks to offer solid guidelines that allow companies to communicate more effectively the financial risks associated with climate change.

In 2022, we began our roadmap for the adoption of the TCFD framework, also aligning with the instructions of the External Circular No. 031 of 2021 of the Finance Superintendence of Colombia (SFC). This process has involved different levels and areas of Banco de Occidente, allowing us to address each of the four pillars and eleven recommendations of the TCFD framework.

As a financial institution committed to the fight against climate change and in compliance with Colombian legislation, we have adhered to this framework, preparing our first TCFD report in 2023. This adhesion reinforces our commitment to transparency and management of climate-related financial risks, aligning us with international best practices.

At Banco de Occidente, we understand that the fight against climate change requires a collective and continuous effort. We are committed to continuing to work to promote sustainable practices and protect our planet for future generations.

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VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Key points

Recommended Disclosure	TCFD Key Aspect	Highlights
Governance **Disclose the governance structure around climate-related risks and opportunities.** **obernanza**	Description of the board's oversight of climate-related risks and opportunities.	We have defined the roles and responsibilities of the governing bodies and teams involved in climate change issues.
	Description of management's role in assessing and managing climate-related risks and opportunities.	We developed the guidelines to guarantee the supervision of climate change from the Board of Directors, the Presidency and the different Committees.
Strategy **It details how risks and opportunities related to climate change affect the organization's business, strategy, and long-term planning.**	Management of climate-related risks and opportunities has identified short, medium and long term. • Adaptation/Mitigation. • Physical/Transition.	We have reached new milestones on the Bank's Climate Strategy, such as the vision to 2050 and the path to decarbonization and climate resilience.
	Define the impact of climate-related risks and opportunities on the organization's business, strategy, and financial planning. • The business. • Strategy. • Financial performance.	We carry out the financial assessment of the prioritized risks and their management.
	Describe the resilience of the organization's strategy, taking into account different climate-related scenarios, including a scenario of 2°C or below.	For the prioritization and assessment of climate-related financial risks, we developed an analysis based on different selection criteria of three (3) climate scenarios to 2050 based on the NFGS scenarios.
Risk Management **It explains how the organization identifies, assesses, and manages climate-related risks, integrating these processes into its overall risk management.**	The Organization's processes for identifying and assessing climate-related risks	The Environmental and Social Risk Management System (SARAS) will be the means by which information on the climate risks to which customers are exposed will be captured.
	Describe the Organization's processes for managing climate-related risks	
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the Organization's overall risk management.	
Metrics and Objectives **It provides information on the metrics used to assess climate-related risks and opportunities and the targets set to manage those risks.**	Disclose the metrics used by the Organization to assess climate-related risks and opportunities in line with its risk management strategy and process.	The Bank currently has sustainable lines designed to finance climate change adaptation and mitigation measures, the balance of the portfolio, the number of loans and the categories of the Sustainable and Transition Taxonomy defined by the Bank will be measured to know the impact of these on the environment and the community.
	Disclose Scope 1, Scope 2 and, where applicable, Scope 3 GHG emissions and related risks.	Since 2022 we have been measuring our scope 1, 2 and 3 emissions, and from 2023 we have contributed to the creation of a tool that allows us to measure and manage financed emissions.
	Describe the objectives used by the Organization to manage climate-related risks and opportunities and performance against the objectives.	We have defined a goal of 8 trillion by 2030 in sustainable portfolio aligned with the categories defined in the Bank's Sustainable and Transition Taxonomy. In relation to our financed emissions, we started our measurement with 3 sectors (Energy, Construction and Oil and Gas).

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Alignment with the Sustainability Strategy

With a strong commitment to inclusive economic growth, we work to ensure that our services contribute to sustainable development, widespread prosperity and resource conservation, ensuring a positive legacy for future generations.

In this line, we adopt principles of Responsible Business Conduct, integrating and addressing environmental and social challenges in all our business activities, including our supply chain. Our sustainability strategy is based on the principles of the Global Compact and the UN Sustainable Development Goals (SDGs), as well as on the adoption of the good practices of the Asobancaria Green Protocol. At Banco de Occidente, we are dedicated to fostering the development of people, the growth of businesses, and the positive transformation of the country through innovative financial solutions.



Alignment with the SDGs

With a commitment to supporting inclusive economic growth, at Banco de Occidente we work to ensure that our services contribute to sustainable development, extended prosperity and the conservation of resources. In this way, we seek to ensure a positive legacy for future generations. With this vision, we have developed three fronts of action aligned with the Sustainable Development Goals:

Fronts of the sustainability strategy and its alignment with the SDGs

Axis	Description	Material matters	SDG
Environmental	Mitigating climate change and conserving resources	→ We are responsible with natural resources. → We manage climate change.	6 CLEAN WATER AND SANITATION 13 CLIMATE ACTION 15 LIFE ON LAND
Social	We promote the development of our people and society	→ We strengthen the financial skills of customers and communities. → We contribute to the development of the regions. → We create valuable experiences. → We promote our talent. → We respect Human Rights.	5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES
Corporate Governance	We drive sustainable business growth	→ We promote sustainable businesses. → We act ethically and sustainably. → We generate profitable and sustainable growth. → We manage our risks. → We are guardians of information. → We transform digitally.	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 11 SUSTAINABLE CITIES AND COMMUNITIES 17 PARTNERSHIPS FOR THE GOALS

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FACTORING

Climate Change Recognition and Partnerships

Within the framework of our strategy, we have deployed actions and initiatives aligned with the country's objectives and global goals for 2030 and 2050. Below, we present the most relevant milestones achieved in our management:

- 1984: Beginning of the annual publication of the Ecobook, an initiative that has contributed to the dissemination of the natural riches of our country.
- 1993: Creation of the Planeta Azul Prize
- 2005–2006: Launch of the Occiauto Planeta Azul line
- 2012: Accession to Asobancaria's Green Protocol
- 2021: Participation in the National Carbon Neutrality Program that is part of the Colombia Carbon Neutral Strategy (ECCN) led by the Ministry of Environment and Sustainable Development
- 2022: Signing of a cooperation agreement to finance part of the research carried out by the Center for Sustainable Finance of the Universidad de los Andes for two years
- 2022: Collaboration agreement with the World Wide Fund for Nature WWF
- 2022: Partnership with the NGO Saving the Amazon
- 2022: Creation of the Bank's Climate Change and Eco-efficiency Strategy
- 2022: Adherence to the United Nations UNEP-FI Principles for Responsible Banking
- 2023: Launch of the green builder line and Planeta Azul Housing
- 2023: Creation of the SARAS (Environmental and Social Risk Management System)
- 2023: Adoption of the TCFD framework and SFC External Circular No. 031 of 2021
- 2023: Partnership with the Inter-American Development Bank (IDB) to advance with advice on the development of a Sustainable Financing Strategy
- 2024: Obtaining the Carbon Neutral certificate for scope 1 and 2 emissions by Icontec
- 2024: Participation in COP16
- 2024: Joining Finance for Biodiversity
- 2024: Publication of our sustainable taxonomy

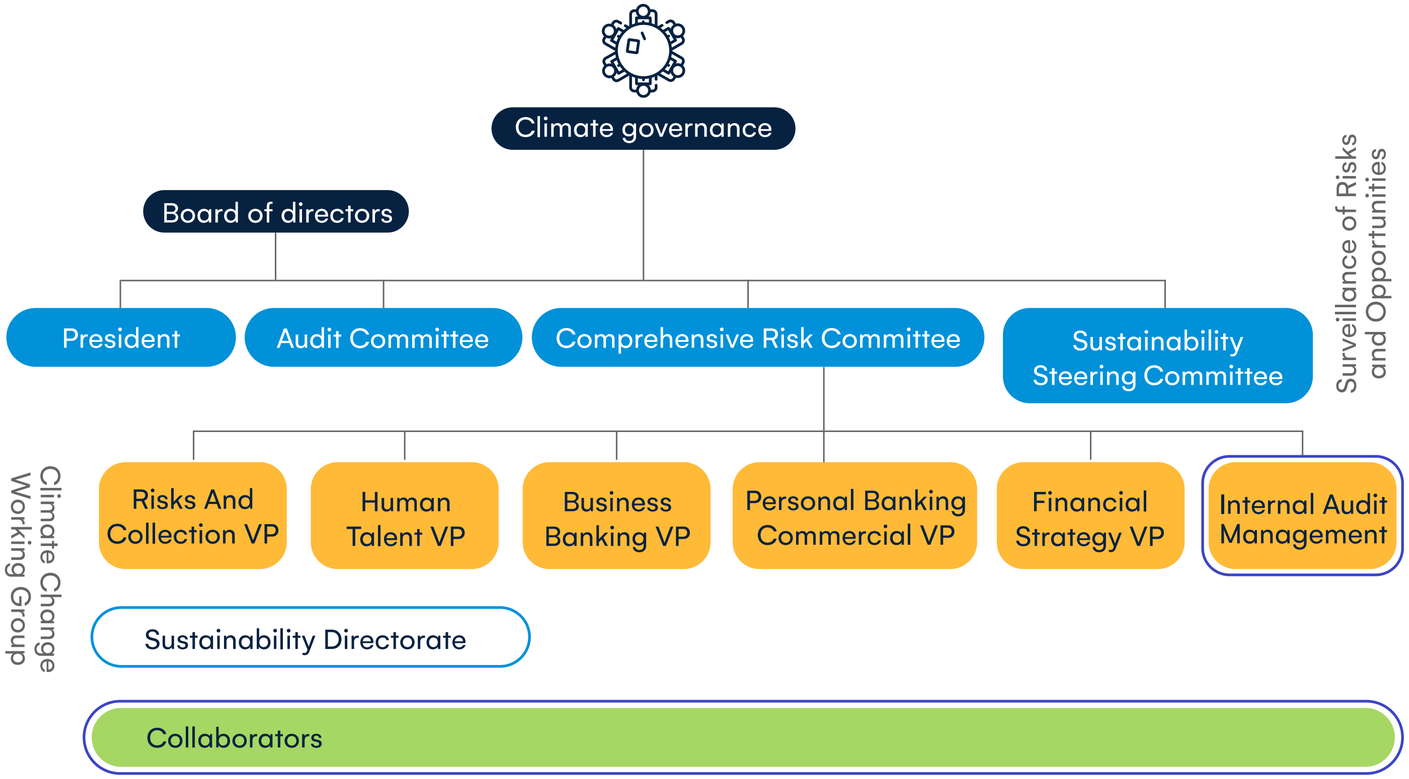


VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Governance

Climate governance at Banco de Occidente is based on the recognition of the importance of climate change in our operations and in our portfolio. We know that as a financial institution we have a great responsibility in managing decarbonization and climate resilience throughout our value chain.

In the spirit of advancing these matters, we have held awareness-raising sessions, in collaboration with expert consultants, to train our teams on the context of climate change, the recommendations of the TCFD framework, and the guidelines established by External Circular No. 031 of 2021. Thus, we seek to impact our Board of Directors, the President, the Support Committees, the Managers, Directors and employees of the Bank, including the Steering Committee of Fiduciaria de Occidente.



Climate governancea

In order to guarantee the ownership of issues related to climate change, we have three (3) lines of defense:

1

First line of defense: Responsible for carrying out actions in every process by following the Corporate Governance guidelines and the regulations in force to prevent materialization of risks.

2

Second line of defense: Comprised by the Risk Vice-Presidency and its managements, responsible for evaluating, measuring, monitoring and mitigating risks.

3

Third line of defense: Constitutes the Audit area, whose purpose is to generate value aligned with the Banks' strategy through the organizational strengthening.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Support structure for the implementation of ESG guidelines at Banco de Occidente

The committees play a fundamental role in the implementation of ESG guidelines at Banco de Occidente, since through them we ensure that strategies and policies are effectively integrated into all the Bank's operations. These committees are essential to ensure that ESG initiatives align with strategic objectives, while promoting sustainability and corporate responsibility in all our activities.

In 2023 the roles and responsibilities were established, in 2024 we complemented the dissemination with the periodicity of these committees. Some of the roles and responsibilities, detailed below, will be strengthened in 2025 with the aim of strengthening our climate governance.

Roles and responsibilities by senior management body

Body	Roles/Responsibilities	Periodicity
Board of directors	AApprove guidelines and mechanisms for the dissemination of climate information. Monitor, verify and follow up on issues that may be material in climate change. Approve frameworks, policies and plans for the management of financial and non-financial risks arising from climate change. Make strategic decisions based on climate change risks and opportunities.	Continuous
Comprehensive Risk Committee	InIntegrate climate change risks and opportunities into the Bank's risk management model. Designate those responsible for managing climate risks and opportunities. Follow up on risk treatment. Be accountable to the Board of Directors on climate-related exposure, risks, and financial impacts.	3 months
Internal Audit Committee	Monitor and ensure compliance with methodologies, processes, and information to be disclosed related to climate change management.	3 months
Sustainability Steering Committee	Be accountable to the President related to the management of climate change risks and opportunities. Ensure that those responsible for monitoring and managing the strategy have climate change skills and knowledge. Ensure the implementation of climate change policies, plans and strategies, approved by the Board of Directors.	3 months

Specific teams dealing with climate-related risk and opportunity management issues, as well as climate risk training programs, will not be addressed in this chapter, but will be developed and detailed in the action plan chapter. This approach allows for comprehensive and structured planning, ensuring that specific actions and training strategies align with the organization's long-term goals. In addition, it is important to note that this is an ongoing process, involving periodic review and updating to adapt to new challenges and opportunities that may arise in the climate and risk management field.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Internal policies and frameworks

Environmental and Climate Change Policy of Banco de Occidente and Affiliates: In our policy we establish the general principles that we must follow to align and develop initiatives that respond to the commitments of the sustainability strategy, in such a way that they are oriented to the management of the business around economic, social, environmental and corporate governance matters. For us, it is essential to consolidate sustainability and its articulation with the purpose and business model of the Bank and its affiliates. With this policy, we want to strengthen the processes for the improvement of business operations, organizational reputation and the positioning of the organization and its affiliates as a benchmark in the Colombian financial sector.



Environmental principles of environmental policy and climate change:

1. Support compliance with the environmental regulations in force in the country and applicable to our activities where Banco de Occidente and its affiliates operate, as well as the voluntary commitments that it adheres to.
2. Design and implement a social and environmental risk management system for projects financed by Banco de Occidente and its financial affiliates.
3. Promote financing for eco-efficient projects and initiatives for both companies and individuals.
4. Develop and strengthen green and/or blue products and services for the different business segments and measure their environmental impact.
5. Implement an environmental management system with responsible use and consumption practices for resources such as energy, paper and water and with performance objectives and indicators.
6. Promote training and awareness among employees, customers, suppliers and other stakeholders about environmental care and protection.
7. Strengthen initiatives with a high environmental impact, such as our Planeta Azul Award and Ecobooks, which exalt educational and productive actions for the benefit of ecosystems and natural resources.
8. Promote sustainable practices in our suppliers and include these criteria in our evaluation and selection processes for the purchase of goods and services.
9. Support environmental projects aligned with our sustainability strategy, mainly those aimed at energy transformation.

Strategy

Based on the sustainability strategy mentioned above, we have developed different guidelines that allow us to further ground the commitment we have with future generations and with the environment, which is why we have developed a specific strategy that addresses mitigation and adaptation to climate change.

Our purpose is to act sustainably, generating awareness in all our employees and promoting sustainable financing initiatives that contribute to generating a positive impact on society, the environment and business.

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Strategy covering climate change issues

At Banco de Occidente, we have implemented multiple initiatives that allow us to advance in the adoption and appropriation of our climate strategy. It has different phases that include the recognition of risks derived from climate change, the identification of decarbonization opportunities and the development of products and services aligned with these findings. In this way, we contribute to nationally determined goals while maintaining the Bank's carbon neutrality and boosting climate resilience in our clients.

Vision of the climate strategy to 2050



Valuation of climate risks (2022 to 2023)

Definition of decarbonization and resilience opportunities at the short (2025) and medium (2030)

Implementation of decarbonization and resilience portfolio (2024 to 2030)

Alignment with the market and national trends (2025 to 2030)

Increase of resilience, carbon neutrality of the Bank as of 2050 and contribution to decarbonization of its portfolio (2050)

Progress against the phases of the climate strategy

Climate Strategy Phase	Temporality	Detail	Progress
Climate Risk Assessment	2022 to 2023	Assess physical risks, such as extreme weather events, and transition risks related to changes in policies, technologies, and markets. This assessment is made taking into consideration different climate scenarios and prioritizing those that could involve greater financial risk due to their impact.	We identified 29 risks arising from climate change, of which 15 were prioritized due to the financial risk they represent
Definition of decarbonization and resilience opportunities in the short 2025 and medium term 2030	2023	Identify opportunities that enable investment in sustainable projects with our financial products that support the transition to a low-carbon economy.	We identified 21 opportunities related to climate change and 9 opportunities arising from financial risks arising from climate change
Implementation of the decarbonization and resilience portfolio	2024 to 2030	Develop products and services that accompany our clients in the transition to low-carbon operations and/or good environmental practices.	We have 4 specialized sustainable lines, and with all our credit modalities we offer financing under 8 eligibility criteria directly and indirectly associated with climate change, environmental protection and ecosystem conservation

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURANDO

Climate Strategy Phase	Temporality	Detail	Progress
Market alignment and national trends to 2030	2025 to 2030	Regularly update internal practices, strategies and processes in line with market trends and national commitments that set a standard at the sector or economic level	We developed our sustainable and transitional taxonomy, based on the Green Taxonomy of Colombia and other criteria at the national and international level.
Increasing resilience, carbon neutrality of the Bank by 2050 and contributing to the decarbonization of its portfolio	2050	Explore the resilience of the Bank's strategy and operations in a changing world, ensuring that the impact generated on the environment is avoided, reduced and mitigated from direct operations and the sectors financed	In 2024. we achieved Carbon Neutrality in scope 1 and 2 emissions. We also started measuring financed emissions for a percentage of our portfolio corresponding to the energy, construction and oil and gas sectors.

Recognizing our role in the decarbonization of the economy and accompanying our customers in these processes, we continue to generate internal and external efforts that contribute to climate resilience in the country.

Climate change risks for Banco de Occidente

During 2023, we carried out an analysis of the risks and opportunities arising from climate change, which has allowed us to advance in the implementation of controls, innovate in the financial solutions we offer, and mitigate the impact we have on the environment. For this process, the following concepts were taken into consideration:

Level of progress of each phase of the climate strategy

- Advanced
- In progress
- In review



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

Physical risks:

These are those risks related to extreme weather events. These can be acute or chronic.

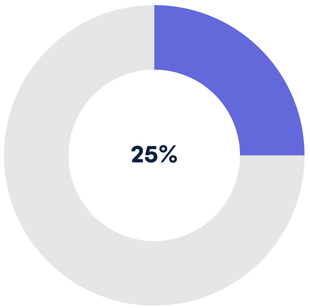
- **Acute:** Refers to a specific disaster or increase in extreme and/or fast-onset weather events such as torrential floods, landslides, cyclones, floods, and heat waves.
- **Chronic:** Long-term changes in weather patterns, such as changes in precipitation regimes and extreme variability in weather patterns, increase in the average temperature of the region, and rising sea levels.

Distribution of physical risks assessed



Distribution of physical risks assessed by time horizon

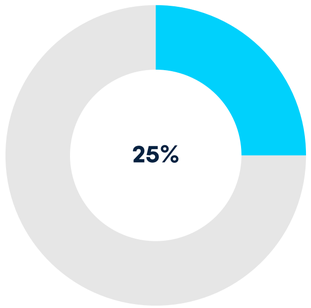
Short-term
< 1 year



Medium-term
Up to 3 years



Long-term
More than 4 years



In this process, Banco de Occidente evaluated 8 physical risks, of which 62% are acute, i.e., they are unexpected extreme events that could impact the Bank's operations and/or portfolio. Of all the physical risks, most are expected to materialize between the short and medium term, demonstrating the importance and urgency of acting on mitigation, prevention, and adaptation to these risks.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Physical risks from climate change

Typology	Climate-Related Risk	Possible Financial Risk	Time Horizon		
			Short Term 1 Year	Medium Term Up To 3 Years	Llong Term More Than 4 Years
Acute	Failure to pay obligations by customers due to damage, deterioration and/or interruption of operations due to extreme weather events	Credit risk due to non-payment of obligations by customers due to damages, deterioration and/or interruption of operations due to extreme weather events	■		
	Increased losses in portfolio exposed to sectors vulnerable to extreme weather events	Credit risk due to increased losses on portfolio exposed in sectors vulnerable to extreme weather events		■	
	Effects on projects financed directly by the bank due to extreme weather events	The Bank's liquidity risk due to the impact on financed projects due to extreme weather events.		■	
	Bank runs by customers for repairs of damages and losses caused by extreme weather events.	Bank's liquidity risk due to early withdrawals by customers for repairs to damages and losses caused by extreme weather events		■	
	Damage, deterioration and/or interruption of the Bank's operation, due to extreme weather events that affect employees and infrastructure.	Operational risk due to damage, deterioration and/or interruption of the Bank's operation, due to extreme weather events that affect employees and infrastructure		■	
Chronic	Changes in precipitation patterns and extreme variability in weather patterns	Loss of value of customer assets (collateral) due to being in areas with water supply problems (desertification)			■
		Increases in customers' operating costs (investments in agriculture)			■
	Sea level rise	Deterioration in the Bank's credit guarantees	■		
					■

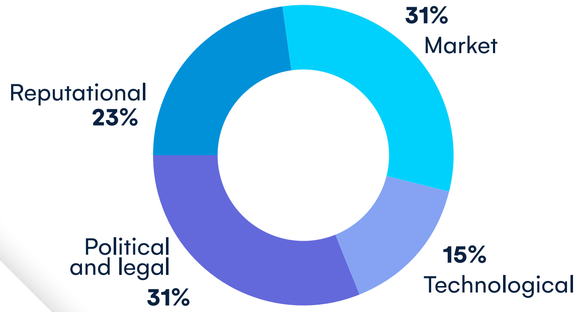


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Transition risks:

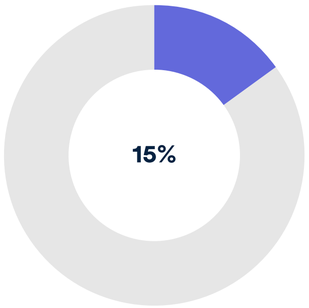
These arise from the political, technological or market change associated with the transition to a decarbonized economy. Depending on the nature, speed, and focus of these changes, transition risks can pose risks of varying levels to organizations. Within transition risks, the TCFD defines the following categories: political and legal risks, technological risk, market risk and reputational risk.

Distribution of the transition risks assessed

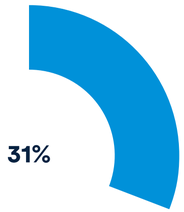


Distribution of transition risks assessed by time horizon

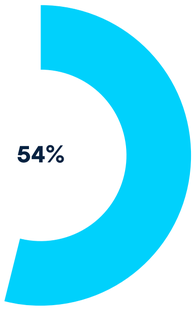
Short–term
< 1 year



Medium–term
Up to 3 years



Long–term
More than 4 years



In this process, the Bank assessed 12 transition risks, of which 62% correspond to market, political and legal risks. Unlike what we analyzed with the physical risks that have recently materialized in the country through fires, water shortages, floods, among others, in the case of transition risks, most of these could materialize in the long term.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Transition risks arising from climate change

Typology	Climate-Related Risk	Possible Financial Risk	Time Horizon		
			Short Term 1 Year	Medium Term Up To 3 Years	Llong Term More Than 4 Years
Market Risk	Lack of alignment of the bank with the sustainable preferences of its customers.	Increased market risk due to the Bank's lack of alignment with the sustainable preferences of its customers.		■	
	Decrease in the viability of lines or business models due to changes in customer preferences (decrease or increase in customers).	Lower lending due to the decrease in the viability of lines or business models due to changes in customer preferences.			■
	Difficulty in liquidating positions in the investment portfolio in carbon-intensive assets or issuers vulnerable to the transition, both local and international.	The Bank's liquidity risk due to the difficulty in liquidating portfolio positions in carbon-intensive and transition-vulnerable assets or issuers, both local and international			■
	Increase in customers' operating costs due to abrupt and unexpected changes in raw materials and inputs.	Credit risk due to the increase in customers' operating costs due to abrupt and unexpected changes in raw materials and inputs.	■		
Technological Risk	Increased customer costs for incorporating low-carbon technologies	Increased credit risk due to increased customer spending when they incorporate low-carbon technologies		■	
	Increase in the bank's costs due to the incorporation of low-carbon technological advances.	Increased operational risk due to failure to incorporate low-carbon technological advances			■
Political And Legal Risks	Climate policy changes, resulting in fines, penalties, and additional expenses to comply with the requirements	Operational risk due to changes in climate policies, resulting in fines, penalties, and additional expenses to comply with requirements.		■	
	Failure to pay obligations by carbon-intensive debtors due to the implementation of national policies	Credit risk due to non-payment of obligations by customers with carbon-intensive activities due to the implementation of national policies			■
	Exposure to litigation	Increased costs due to possible environmental litigation for customers, due to non-compliance with regulations.	■		
		Potential lawsuits against the Bank for failing to comply with climate change regulations in the business or supply chain.			■
Reputational Risk	Reputational risk due to climate inaction	Reputational risk due to climate inaction		■	
	Changes in consumer preferences	Loss of customers for the Bank, because it is considered that it finances projects or activities harmful to the environment.			■
	Stigmatization of the sector	Deterioration of the Bank's image due to possible lack of commitment when financing projects or activities that affect the environment.			■

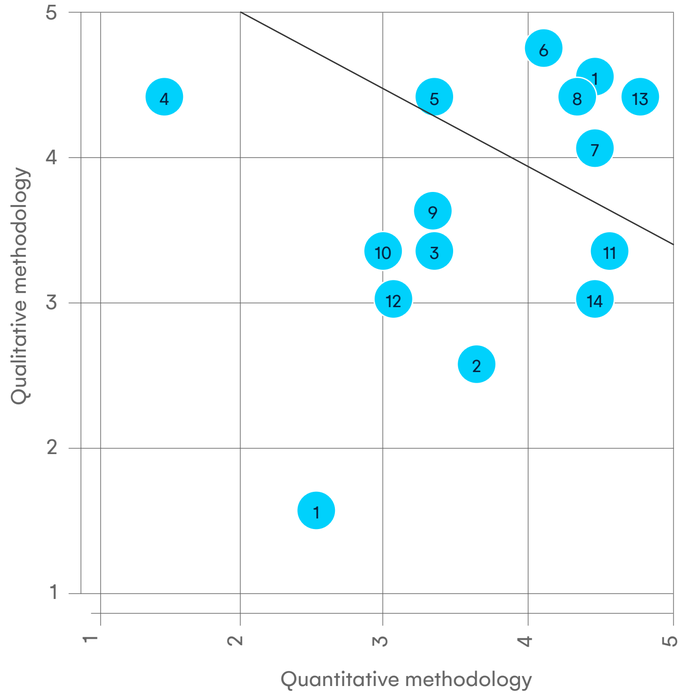
Starting in 2025, the risks identified will be reviewed annually, with the aim of ensuring the alignment of the assessment of these risks with the Bank's comprehensive risk management, updating the assumptions and potential impacts and promoting the incorporation of best practices to have results that respond to the reality of each moment.

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Assessment of financial impacts associated with climate change

To assess the financial risks arising from climate change, in 2023 we used a quantitative and qualitative methodology that allowed us to prioritize 6 risks:

Climate risks prioritized at the financial valuation stage



1	Credit risk due to non-payment of obligations by customers due to damages, deterioration and/or interruption of operations due to extreme weather events
6	Credit risk due to the increase in customers' operating costs due to abrupt and unexpected changes in raw materials and inputs.
13	Credit risk due to increased losses on portfolio exposed in sectors vulnerable to extreme weather events
7	The Bank's liquidity risk due to the impact on financed projects due to extreme weather events.
5	Increased market risk due to the Bank's lack of alignment with the sustainable preferences of its customers.
8	The Bank's liquidity risk due to early withdrawals by customers for repairs of damages and losses caused by extreme weather events.

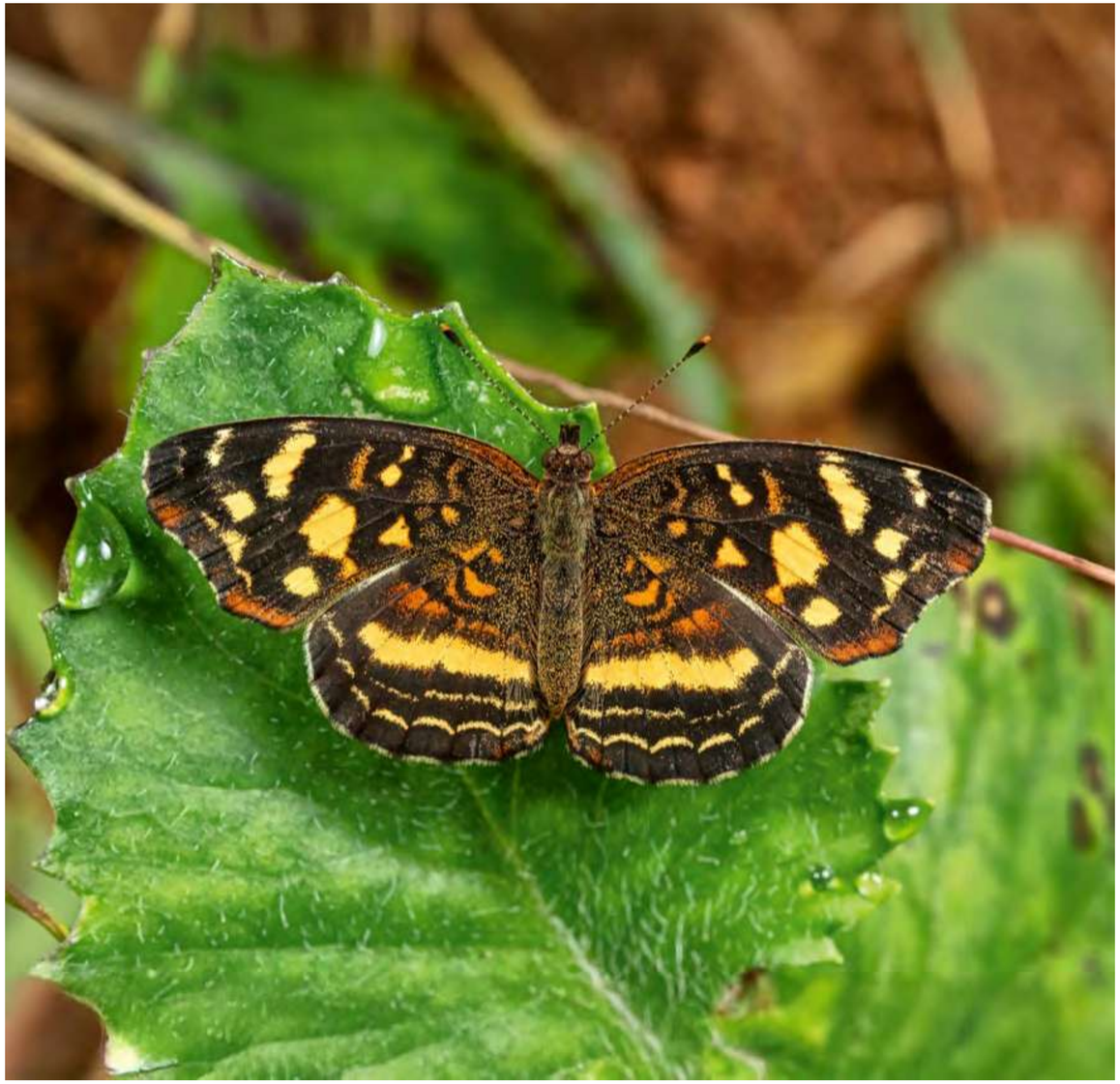


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For each of these financial risks derived from climate change, the financial impacts were explored under stochastic, non-deterministic methodologies:

Assessing the financial impacts of prioritized risks

TCFD Category	Risk Description	Impact Description
Acute physical risk	Credit risk due to non-payment of obligations by customers due to damage suffered, deterioration and/or interruption of operations due to extreme weather events (Risk 1)	Increase in indicators: Loss Given Default (LGD), Probability of Default (PD) and Exposure to Default (EAD).
Acute physical risk	Credit risk due to the increase in customers' operating costs due to abrupt and unexpected changes in raw materials and inputs. (Risk 6)	Increase in indicators: Loss Given Default (LGD), Probability of Default (PD) and Exposure to Default (EAD).
Acute physical risk	Credit risk due to the increase in losses in portfolio exposed in sectors vulnerable to extreme weather events. (Risk 13)	Increase in indicators: Loss Given Default (LGD), Probability of Default (PD) and Exposure to Default (EAD).
Market risk	Increased market risk due to the Bank's lack of alignment with the sustainable preferences of its customers. (Risk 5)	Decrease in deposits, portfolio prepayments, Decrease in market share
Acute physical risk	The Bank's liquidity risk due to the impact on financed projects due to extreme weather events. (Risk 7)	1. Reduction of the bank's liquidity ratio (current assets/current liabilities). 2. Reduction in the percentage of cash available to meet customers' liquidity requirements (Quick ratio). 3. Critical levels of cash ratio (liquid assets + equivalents/current liabilities).
Acute physical risk	The Bank's liquidity risk due to early withdrawals by customers for repairs of damages and losses caused by extreme weather events. (Risk 8)	1. Reduction of the bank's liquidity ratio (current assets/current liabilities). 2. Reduction in the percentage of cash available to meet customers' liquidity requirements (Quick ratio). 3. Critical levels of cash ratio (liquid assets + equivalents/current liabilities).



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

The stochastic, non-deterministic methodology developed in 2023 by Ecoacciones takes into account the uncertainty about the future behavior of economic, technical, environmental and physical variables. This methodology allows assigning probability distribution functions to each variable, which enables the simulation of the probable distribution in terms of frequency and probability, obtaining results in ranges instead of point data, strengthening the analysis exercise.

For each risk, the climatic parameters associated with its cause or origin are identified, analyzing behaviors not only historical but also projected specifically for Colombia, taking as a source different climatic databases associated with the selected climate scenarios. The bases consulted come from models and simulations widely accepted by the financial industry such as the NGFS network, compilations of models from the Intergovernmental Panel on Climate Change IPCC on the platform of the International Institute for Applied Systems Analysis IIASA; this information is interrelated with the Bank's own specific operating variables, which allows us to estimate a quantification of the financial value associated with each of the risks, either through opportunity costs such as lost revenues, or on the other hand to quantify impacts such as the potential value of the partial or total loss of portfolio due to extreme weather events since customers could compromise their ability to pay in the face of unforeseen situations.

Climate change management

Recognizing the aforementioned risks and the commitment adopted by the Bank, during 2024 different initiatives were carried out that allow us to be a more sustainable organization committed to caring for the environment. Some of these initiatives are:

- We reduced the use of paper by 50% in our offices due to the increased use of our digital platforms.
- All our credit cards are made of 89.5% recycled PVC.
- We strengthened the Planeta Azul Community to generate awareness and commitment in all citizens.
- We generated spaces for reflection and training of our employees with the implementation of our Environmental Education Program, emphasizing good practices for saving and efficient use of natural resources. On the other hand, we have a Course "Together is Possible — WWF" in which employees recognize good actions for the preservation and conservation of biodiversity.
- We managed to get more than 1200 employees to use Try my Ride, which promotes the use of sustainable means of transportation according to our Sustainable Mobility Program, aligning environment with the sustainable mobility strategies defined by the mobility secretariats of Bogotá and Cali.
- We promoted the responsible use of resources such as water and energy through our newsletter "On the Side of Those Who Do" where we recognize the



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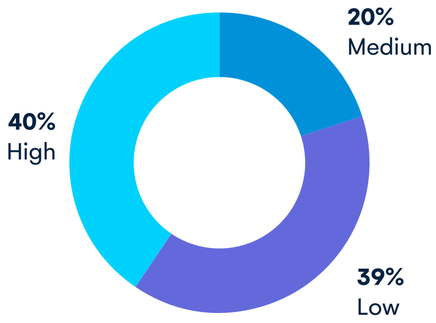
Portfolio exposure to climate risks by sector

As part of the implementation of the TCFD recommendations and following the guidance provided by the Banking Association of Colombia, we have carried out a detailed classification of the bank's loan portfolio according to economic sectors, using the International Standard Industrial Classification (ISIC). This analysis aims to assess and manage the exposure of each sector to climate risks, categorizing them according to the nature of their activities and their level of vulnerability.

The sectors have been classified into three categories: high, medium and low exposure to climate risk and can be seen in the graph below.

This segmentation will allow us to focus efforts on those customers who require greater support to manage climate risks that may affect their financial situation and value generation in the short, medium and long term, as well as to promote opportunities that can have a positive financial impact on our customers. In addition, this segmentation makes it possible to accurately identify the areas that require greater attention and proactive management, facilitating strategic decision-making and the development of policies that contribute to the bank's resilience and sustainability in the face of climate challenges. In addition to these efforts, during 2024 different stress tests were carried out by geography and sector, which made it possible to identify some latent risks in the portfolio and establish mitigation plans to minimize exposure to these climate risks. In this process, it was identified that the cost of provisions is higher in an adverse scenario with risks derived from climate change[1] than in the other scenarios evaluated in these tests.

Criticality distribution according to portfolio percentage



In the detailed analysis of the Bank's loan portfolio, we have identified a total of 24 sector divisions that are classified as high climate risk, representing 39% of the total portfolio[2]. These divisions are particularly vulnerable to the adverse impacts of climate change, whether because of the nature of their activities, their geographic location, or their dependence on climate-sensitive natural resources.

In addition, we have identified 14 divisions that present a medium climate risk, which constitute 20% of the portfolio. These divisions, although not as exposed as the high-risk still face significant risks that must be managed with adequate mitigation and adaptation measures.

Finally, 49 sectoral divisions have been classified as having low climate risk, representing the remaining 40% of the portfolio. These divisions have relatively lower exposure to climate risks, although it is important to continue to monitor their situation to ensure that they maintain low exposure and vulnerability to potential changes in weather conditions.

However, in order to analyze the trends in our portfolio in recent years, we have analyzed the information corresponding to 2022 and 2023. In this classification of the level of criticality in previous years, the percentage of the portfolio exposed to climate risks at an average level was 10% lower compared to 2024. When analyzing in greater detail the concentration of the portfolio by those ISIC divisions classified at medium risk, in the graph below, there is evidence of an increase between 2022 and 2024 in water collection, treatment and distribution activities, which includes the operation of irrigation canals, the collection, treatment and distribution of water for domestic and industrial use, the purification of water, among other key activities, which may reflect the water crisis in the country, which materialized in water rationing in Bogotá. In addition, there are other divisions that had lower growth such as Installation, maintenance and specialized repair of machinery and equipment and Manufacture of other non-metallic mineral products, which responds to the recovery and gradual growth of the construction sector after the COVID 19 pandemic. On the other hand, the percentage of the commercial portfolio exposed to high climatic risks maintains the proportion in the three periods of time with slight variations that may respond to market behavior.

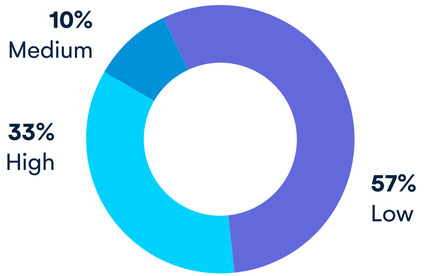


[1] The adverse scenario with climate risk takes into account a hypothetical scenario in which the economy and the financial system are affected by unexpected shocks and acute physical risks arising from climate change.
[2] The remaining 1% of the portfolio corresponds to employees, pensioners and investors. They were not included in the sectoral classification.

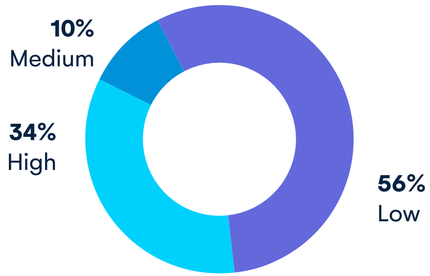
VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FOLIGRAM

Criticality distribution according to the percentage of the 2023 and 2022 portfolio

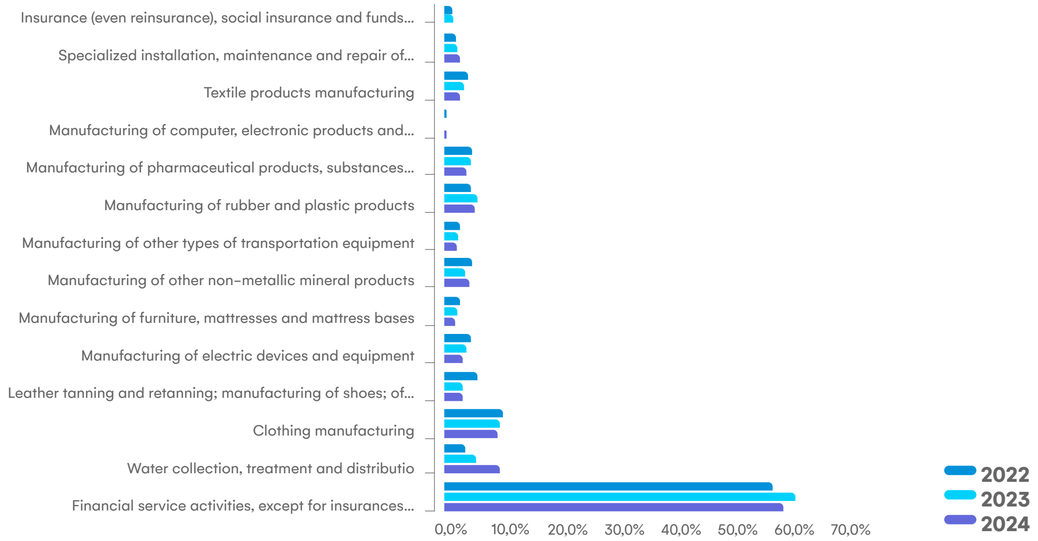
Criticality level of Banco de Occidente's portfolio December 2023



Criticality level of Banco de Occidente's portfolio December 2022



Average criticality distribution according to percentage of portfolio



Main sectors at high climate risk in 2024

In the category of high exposure to climate risk, we have identified that the top five divisions account for almost 24% of the total value of the portfolio. These divisions are key due to their significant participation in the portfolio and their high vulnerability to climate impacts.

Main economic activities with high risk





VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

A. Manufacture of food products

This sector is essential for the country's food security and economic development, but it faces a variety of climate risks that can impact its sustainability and long-term performance. This category includes subsectors such as the production of vegetable and animal oils and fats, prepared animal feed, sugar and panela, coffee products, milling, dairy products, the processing and preservation of meat, fish, fruits and vegetables, among others.

Among the main transition risks we have identified is the need to adopt new low-emission technologies, which could imply high investments by companies and the risk of rapid obsolescence. In addition, changes in consumer behavior towards more sustainable products and volatility in commodity prices can affect the demand and operating costs of each company in this sector.

In terms of physical risks, the sector is highly vulnerable to extreme weather events such as floods, droughts and heat waves, which can disrupt production and affect product quality. These events can cause supply chain disruptions, increase production costs, and reduce the availability of essential inputs. In order to review this exposure and generate information to improve financial planning and risk management, in 2024 we developed different stress tests in which different risks such as droughts and rainfall for the agricultural sector in the country were reviewed, which has made it possible to identify actions to mitigate the risks that these climatic events represent for the Bank.

Legal and reputational risks are also significant, as non-compliance with environmental regulations and negative public perception can lead to penalties and loss of consumer trust. The need to adapt to stricter regulations and market expectations for sustainability is crucial to staying competitive.

In the macro environment, climate change can alter the supply of agricultural products, generating greater dependence on imports and affecting the economic stability of the sector. The reduction in the quality of products and the volatility of hedging financial instruments are other factors that can negatively impact organizations in this sector.



VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. COLOMBIA

Climate change risks for the food processing sector

Transition risks			
	Threats	**Consequences**	**Impact**
Technological risk	→The availability and adoption of low-emission technologies is crucial. →Rapid innovation can quickly make investments in new technologies obsolete, which could lead to losses in infrastructure and services associated with high emissions. →Companies that do not adopt efficient and low-carbon technologies could lose competitiveness.	→Loss of value in old infrastructure, increase in production efficiency through technological advances and development of low-carbon products.	→Emerging markets are at risk of being left behind due to less developed technological infrastructure compared to industrialized markets. →Adoption of new technologies for more efficient production and lower emissions implies high investment costs. →Carbon-inefficient assets can lose value. →Delayed adoption of new technologies can result in inefficient supply chains and lower productivity in harvests and production.
Market risks	→Changes in consumer behavior towards low-emission intensity products. →Increased input costs due to declining productivity and volatility in commodity prices. →The demand for more sustainable substitutes could also increase	→Reduction in the demand for carbon-intensive products, entry of new market participants, and loss of competitiveness compared to products that certify zero emissions and are sustainable.	→Increase in the cost of capital for emissions-intensive activities, lower productivity of crops not adapted to sustainable models and higher operating costs.
Reputational risk	→Subsectors such as livestock can be negatively perceived by deforestation practices, high emissions and ecosystem degradation. →Changes in consumer and community preferences can lead investors to demand greater transparency about climate risk management, forcing changes in the business model or in the creation of new products.	→If a company does not meet the expectations of customers and society for climate action, it can see reduced demand and the attraction of investors. →A negative reputation in a carbon-intensive subsector, such as livestock, can make financing difficult. →The demand for unsustainable products may decrease.	→Reduction of available capital due to divestments if minimum standards are not met. →Increased demand for food and bioenergy with population growth increases pressure on supplies such as water, seeds and agro-inputs →Reduction in the demand for products and services due to negative environmental impacts.

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Transition risks			
	Threats	**Consequences**	**Impact**
Physical risks			
Acute risk	→Increase in extreme weather events such as high rainfall, prolonged droughts, fires, and heat waves. →Low rainfall for prolonged periods of time can generate water stress. →Increase in fires →Prolonged heat waves due to the increase in the average temperature of the planet.	→Disruption in food chains and systems due to adverse climatic events. →Infrastructure such as production machines could be damaged or destroyed by weather events	→Food production could be disrupted by strong weather events. →Risk of loss of inventories due to looting in stores and production plants due to internal disruptions of local economies due to extreme weather events. →Effects on the road infrastructure necessary for the connectivity of markets and consequent difficulty in marketing
Chronic Risk	→Sea level rise, impacting cities and coastal territories of the country. →Loss of adaptive capacity of ecosystems due to the prolonged and accelerated increase in temperatures. →Increase in temperature in the medium and long term, affecting the entire planetary climate system. →Change in hydrological regimes causing a change in the frequency and intensity of rainfall in the long term.	→Disruption in food chains and systems due to adverse climatic events, interrupting agricultural production cycles. →Impacts on crop quality, yields and length of harvest periods. As well as loss of the fertile potential of regions. →Decrease in habitability and work capacity due to extreme weather events that do not allow outdoor work or the mobilization of people.	→Alteration of the supply of agricultural products due to the adaptive capacity of species to climate change. →Destabilization of the agricultural sector, negatively impacting the country's macroeconomic and fiscal stability due to adverse weather conditions. →Deterioration of the quality of food products. →Financial volatility due to climate uncertainty. →Reduction of supplies for stock due to lack of availability of raw materials.

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B. Supply of electricity, gas, steam and air conditioning

The electricity, gas, steam and air conditioning supply sector is fundamental for development and social welfare in Colombia, as it provides essential services that sustain daily life and the functioning of the industry. This sector encompasses several critical activities, including the generation, transmission, distribution and marketing of electricity; gas production and pipeline distribution of gaseous fuels; as well as the supply of steam and air conditioning.

Technological risks include falling prices in renewable energy generation technology and the costs associated with transitioning to lower-emission technologies for conventional fossil fuel generators. In Colombia, some generators that rely on fossil fuels must quickly adapt to cleaner energy. Technological evolution makes its infrastructure obsolete and less competitive, forcing a transition to stay in the market.

Based on global trends up to 2024, some market risks have been identified in this sector, as the accelerated decline in demand for fossil fuels due to decarbonization and the increase in the cost of raw materials for electricity generation may pose significant threats. The depreciation of different assets due to the pollution they generate, together with the fluctuation of energy prices, can reconfigure the supply and demand structure of the sector, favoring renewable energies. Additionally, in Colombia there is evidence of uncertainty regarding the rationing of fundamental resources such as water and its possible repercussions on energy supply due to the country's high dependence on hydroelectric plants. However, by 2025 these trends are expected to vary significantly due to emerging senior leaders such as Donald Trump in the United States who are dissociating themselves from initiatives related to decarbonization and the fight against climate change.

Reputational risks include stigmatization of the sector's value chain associated with high emissions and negative feedback from investors, forcing changes in the business model. Coal and oil production within the sector's value chain will experience a decrease in investment flow while consumer preferences, influenced by the negative reputation of fossil fuels, may reduce their demand.

In terms of physical risks, adverse weather events, such as high rainfall, water stress, fires, and heat waves, affect costs and investments, reducing productivity and efficiency in the fossil energy supply chain, and can destroy or disrupt physical assets and infrastructure. Chronic risks include rising sea levels, which impact cities and coastal territories, and the loss of adaptive capacity of ecosystems due to prolonged temperature rises. These variations impact the frequency and intensity of rainfall, which can alter water availability, increase costs and investments, and cause disruptions in value chains.

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Climate change risks for the electricity, gas, steam and air conditioning supply sector

Transition risks			
	Threats	**Consequences**	**Impact**
Technological risk	→Decrease in prices of technology for the generation of renewable energy. →Cost of transitioning to lower-emission technology by increasing annual depreciation costs.	→Possible change in energy market players. →Changes in the supply and demand structure of the sector that favor renewable energies. →Decrease in tax revenues dependent on the fossil fuel sector.	→Production efficiency favors renewable energy companies and negatively affects fossil fuel companies. →Technological changes make it difficult to predict fuel and energy demand, leading to unfavorable auction sales for producers. →Generating companies face depreciation and loss of infrastructure. →Production, maintenance, and distribution costs increase due to lagging technologies.
Market risks	→Accelerated decline in domestic demand for fossil fuels due to an accelerated decarbonization transition. →Increase in the cost of raw materials for the generation of electricity from fuels. →Change in asset valuation as companies and investors increasingly incorporate climate risks and emission prices into asset valuations. →Fluctuation in energy prices due to the integration of renewable energies.	→The fall in the prices of technology for renewable energy production impacts the demand and income of fossil fuel-based energy production. →The current infrastructure is backward and uncompetitive. →The fossil fuel business model could be heavily impacted financially.	→The pressure to use domestic fossil resources without international demand and selective demand favor renewable energies, negatively impacting fossil fuel companies. →Decreased demand and loss of value of fossil fuel companies' shares due to new energy market valuations. →Lower expected returns due to the increase in production and operating costs in addition to the decrease in the value of assets. →Loss of competitiveness due to access to materials and increase in the price of raw materials.

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Transition risks			
	Threats	**Consequences**	**Impact**
Reputational risk	→Stigmatization of high-emission sub-sectors due to changing perceptions towards a low-carbon economic transition. →Negative feedback from investors in the sector forcing changes in the business model.	→Sectors such as coal and oil production will see the flow of resources reduced by direct or indirect investment. →Changes in the business model due to increasing financial climate risks for investors. →Changing consumer preferences can decrease demand for fossil fuels due to bad reputation.	→Reduction of demand and returns in sectors intensive in greenhouse gas emissions. →Increase in operating costs due to difficulty in attracting workforce, reduction of available capital, loss of asset value and decrease in returns due to negative reputation. →Disruption of supply chains by companies not adapted to low-carbon models.
Physical risks			
Acute risk	→High rainfall can generate hydrological risks and geotechnical risks. →Low rainfall for prolonged periods of time can generate water stress and decrease in river flows. →ncrease in fires due to low rainfall and rising temperatures. →Prolonged heat waves due to the increase in the average temperature of the planet.	→Adverse weather events affect costs and investments, reducing productivity and efficiency in fossil energy subsectors. →Adverse weather events disrupt production, distribution and marketing, causing disruption in value chains. →Adverse weather events can destroy or alter physical assets and infrastructure, and increase geotechnical risks due to erosion and loss of vegetation cover, affecting the stability of energy infrastructure.	→Disruption of transmission and distribution systems. →Volatility in energy prices and instability in the country's energy security due to climatic effects. →Decrease in the demand for fuels due to disruptions in the economic system. →Increase in coal mining exploitation costs due to excessive rainfall. →Damage to pipelines and power grids, and damage to infrastructure due to high winds, causing supply chain disruptions.
Chronic Risk	→Sea level rise impacts cities and coastal territories in the country. →Loss of adaptive capacity of ecosystems due to the prolonged and accelerated increase in temperatures, affecting the structure and regenerative capacity of natural systems. →Variations in water availability patterns, altering the frequency and intensity of rainfall in the long term.	→Adverse weather events affect costs and investments, reducing productivity and efficiency in fossil energy subsectors. →Disruption of value chains due to adverse climatic events, interrupting production, distribution and marketing. →Adverse weather events destroy and alter physical assets and infrastructure, increasing geotechnical risks due to erosion and loss of vegetation cover, affecting the stability of energy infrastructure	→Decrease in the demand for energy for heating and increase in demand for refrigeration. →Conflicts with communities over scarce resources such as water. →Change in seasonal energy demand and increased peak demand level during extreme heat or other conditions. →Water stress and higher water temperatures reduce energy production and operational capacity in thermal generation. →Increased electricity losses in transmission and distribution due to heat load.

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C. Civil engineering works and building construction

The building construction and civil engineering sectors can be grouped into the same category, as they face similar challenges and risks. The civil engineering and building construction sector is responsible for providing the necessary infrastructure that supports daily life and the operation of the industry. This sector encompasses several critical activities, including the construction of roads and railways, the construction of public service projects, and the construction of buildings, among others.

Among the transition risks, the need to adopt low-emission technologies in procedures, which represents a significant challenge due to high investments and the possibility that such technologies will quickly become obsolete. The substitution of current products and services with less emissions-intensive options, together with the high cost of this transition, are considerable threats. In addition, consumers and customers are increasingly inclined to prefer projects and buildings with a lower carbon footprint, which may influence the demand for projects that do not integrate sustainable and energy-efficient practices.

Changing consumer behavior can also lead to a decrease in demand for products with high greenhouse gas emissions. Infrastructure that is not adapted to the new climate conditions will face higher insurance costs, and carbon-intensive subsectors will struggle to obtain financing, which will affect their competitiveness.

Eventually, the sector may have to deal with significant reputational risks, since according to the World Green Building Council (WGBC), the construction sector worldwide consumes 50% of the resources extracted, uses 15% of the fresh water consumed in the world and is responsible for more than 35% of CO_2 emissions. That is, their contribution to climate change is high (IDB, 2024). This has led internationally and may lead to stigmatization of the sector in Colombia associated with high emissions and negative feedback from investors, which can make it difficult to attract financing. In addition, the fall in demand for unsustainable constructions could harm the competitiveness of companies in this field.

On the other hand, the sector faces both acute and chronic physical risks. High rainfall can cause floods and avalanches, while low rainfall leads to water stress. These adverse weather events will transform supply and demand, require infrastructure reconstruction, and increase construction and insurance costs. In the long term, sea level rise will impact cities and coastal territories, affecting productivity and efficiency in construction projects.

Infrastructure that is not adapted to the new climate conditions will face higher insurance costs, and carbon-intensive subsectors will struggle to obtain financing, which will affect their competitiveness.



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Risks arising from climate change for the Civil engineering and building construction sector

Transition risks			
	Threats	**Consequences**	**Impact**
Technological risk	→Replacing existing products and services with less emissions-intensive options. →High cost of transitioning to lower-emission technologies as the sector is a large consumer of energy.	→Capital investments for less carbon-intensive technological renewal. →The emergence of new technologies can configure new business models, where the supply and demand of goods and raw materials in the sector changes. →Research and development expenses will increase having an impact on the cost structure of companies.	→Risk of lagging behind in emerging markets due to lagging technologic l infrastructure and lower penetration of low-carbon technologies. →Consumers will prefer companies with lower carbon footprint products or natural substitutes. →Reduced demand for thermally inefficient properties by large corporations, reducing revenues. →Production of materials such as steel, iron and cement requires high energy consumption and large investments in R+D to improve efficiency or carbon capture technologies. →Higher insurance premiums and stricter exclusion clauses for commercial properties not adapted to new technologies.
Market risks	→Change in consumer behavior causes an accelerated decline in domestic and international demand for products high in greenhouse gas emissions →Uncertainty in market signals and sudden change in prices	→The demand for construction materials such as iron, cement and stone aggregates depends on economic development and population growth that will continue in underdeveloped economies. →Demand for low-carbon products will increase in developed economies.	→Infrastructure not adapted to new climatic conditions will face higher insurance costs. →Carbon-intensive subsectors will have difficulty obtaining financing, losing competitiveness. →Improvements in recycling and adoption of a circular economy will create a market for recycled raw materials that is cheaper and more competitive in price and impact. →Increased quality requirements and demand for specialty metals for sectors such as transportation. →Decrease in the demand for offices and commercial spaces, impacting income from the sale and rental of these spaces.

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Transition risks			
	Threats	**Consequences**	**Impact**
RReputational risk	→Stigmatization of subsectors or means of transport associated with high emissions. →Negative feedback from investors due to changes in consumer and community preferences, as well as better risk incorporation in the sector force changes in the business model.	→Inability to attract finance due to a negative reputation associated with a carbon-intensive subsector. →Fall in the demand for unsustainable constructions. →Early depreciation of infrastructure associated with high emissions.	→Difficulty for the sector to obtain financing. →Higher interest rates on carbon-intensive subsectors. →Difficulty attracting customers due to changes in consumer preference and stigmatization of carbon-intensive products. →Loss of value of assets with a negative reputation (i.e. infrastructure with low energy efficiency and high carbon emissions).
Physical risks			
Acute risk	→High rainfall causes hydrological risks such as floods, avalanches and high flows and geotechnical risks such as landslides and avalanches. →Low rainfall in certain regions causes water stress, leading to water scarcity and the disappearance of rivers. →Prolonged heat waves increase fires and their rapid spread.	→Increased natural disasters will transform supply and demand, and will require rebuilding and repairing infrastructure. →Adverse weather events can cause price shocks and inflation in raw materials and services. →Adverse weather conditions are key factors in construction delays and increase costs throughout the value chain.	→Damage to infrastructure due to adverse weather events can extend times and increase construction costs. →Increase in accidents and risks to the health and safety of employees, raising operational costs. →Expectations of acute weather events can affect property values and increase credit risks.
Chronic Risk	→Rise in sea level impacting the cities and coastal territories of the country. →Rising temperatures affect the adaptive capacity of ecosystems by decreasing the provision of ecosystem services, such as water resource generation and carbon absorption capacity. →Increase in temperature in the medium and long term makes it difficult to predict climate and causes instability in human activities. →Changes in hydrological regimes varying water availability and changes in rainfall.	→Adverse weather events affect cost and investment structures, reducing productivity and efficiency in construction projects. →Adverse weather events can interrupt the production, distribution and marketing of construction materials, hindering the efficiency of construction processes and the integration of the different stages of the project. →Extreme weather events can reduce or interrupt livability and work capacity, preventing outdoor work and the free movement of employeeses.	→Acute natural disasters will transform supply and demand, and will require infrastructure reconstruction. →Adverse weather events can cause price shocks and inflation in raw materials and services. →Adverse weather conditions delay construction and increase costs throughout the value chain. →Increased rainfall increases costs for downtime and water treatment. →Expectations of acute weather events can affect property values and increase credit risks.

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D. Land transport and pipeline transport

The land transport and pipeline transport sector is essential for the connectivity and economic development of different geographies of the country, facilitating the movement of people and goods along regions and borders. This sector encompasses several key activities, including rail transport, pipeline transport, and automotive public land transport. Through these modalities, efficient mobility, resource distribution and accessibility are ensured, contributing significantly to growth and socio-economic integration. This sector is particularly sensitive to challenges related to the transition to more sustainable and low-carbon technologies.

The sector must adapt to increasing pressure to reduce carbon emissions. The decrease in costs in the production of electric, hydrogen and biofuel transports is facilitating this transition for the land transport sector, although the lack of electric charging infrastructure and the absence of incentives for innovation represent significant obstacles. If major players do not adopt low-carbon technologies, they risk losing regional and local competitiveness. Changes in demand favor the use of less polluting vehicles and machinery, which can lead to depreciation of assets associated with high emissions, increase the operating costs of production and maintenance of assets, and hinder the distribution of the final product due to the persistence in the use of obsolete technologies.

In terms of market risks, public perception and consumer pressure are leading to a shift in preferences towards more sustainable transport options. Companies that do not align with these changes may face difficulties in attracting finance and suffer a drop in demand for carbon-intensive transport. This can result in increased price volatility and increased capital costs for companies with a negative reputation in terms of carbon emissions.

The sector also faces both acute and chronic physical risks due to climate change. High rainfall can cause flooding and landslides, while low rainfall can lead to water stress and increase the frequency of fires. These adverse weather events can increase transportation costs and require new routes, affecting the efficiency of supply chains. In the long term, rising sea levels and extreme temperatures can affect infrastructure and increase maintenance and operating costs. Within the framework of the stress tests, the variations in precipitation in this sector were evaluated, for which the highest average impact was identified, compared to other sectors such as agriculture, real estate, commerce, industries, among others.

The sector must adapt to increasing pressure to reduce carbon emissions. The decrease in costs in the production of electric, hydrogen and biofuel transports is facilitating this transition for the land transport sector.



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Climate change risks for the a. Land transport and pipeline transport sector

Transition risks			
	Threats	**Consequences**	**Impact**
Technological risk	→Investments in low-carbon technologies are increasing and emissions intensive technologies are decreasing. →The production costs of electric, hydrogen, and biofuel transportation have fallen and are expected to continue to decline over the next decade. →Absence of incentives for innovation and adoption of low-carbon technologies in the sector.	→The decrease in the costs of production and marketing of low-carbon energy-based transport will negatively impact the revenues of transport subsectors with high emissions. →Low electric charging infrastructure hinders resource flows and incentives for market participants to adopt electric technologies in transportation. →If the main players in the sector do not adopt efficient and low-carbon technologies due to lack of incentives, they could lose regional and local competitiveness.	→The use of railways and vehicles with low-carbon fuels (hydrogen, electricity, biofuels) is encouraged. →Scaled production of electric vehicles reduces prices and facilitates adoption. →High investments in infrastructure and technology renovation to produce low-carbon vehicles. →Depreciation and loss of assets associated with high emissions, and loss of market value of inefficient companies. →Increased costs in production, maintenance and distribution due to the use of obsolete transport technologies based on fossil fuels. →Inefficiency in supply chains due to the delay in adopting new low-carbon technologies.
Market risks	→The accelerated transition to decarbonization will significantly reduce the demand for carbon-intensive transportation systems. →International pressures will drive public policies that will aggressively increase fossil fuel prices. →Companies and investors will incorporate climate risks and emissions prices into their valuations and investment decisions, due to growing awareness of climate change.	→Fall in valuations of high-emission sector assets. →Changes in the structure of supply and demand that will favor low-carbon transport, such as vehicles that run on electricity, hydrogen, biofuel and rail networks. →Decreased equity and value of assets that are carbon intensive such as gasoline, diesel, or petrodiesel vehicles.	→Sectoral and competitive reconfiguration in international markets towards more sustainable modes of transport. →Inventories immobilized by the reduction in demand for carbon-intensive transport. →Investments in high-emission transportation do not generate the expected returns. →Inefficiencies in the supply chain due to the imbalance in the supply and demand of high-emission transport. →Exit of market participants who are not prepared for the new business model.

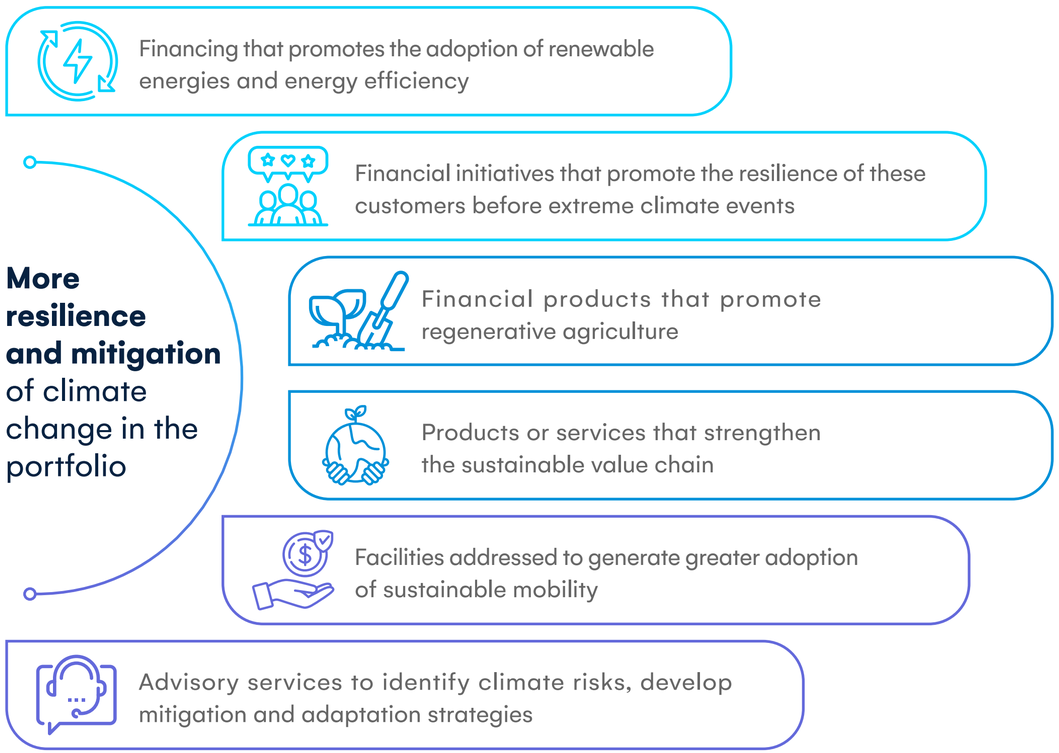
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Transition risks			
	Threats	**Consequences**	**Impact**
Reputational risk	→Consumer and community perceptions of a company's contribution to the transition to a low-carbon economy lead to stigmatization of high-emission modes of transport. →Changes in consumer and community preferences, along with better risk management, will lead investors to divest and reduce resource flows in high-emitting subsectors.	→Inability to attract finance due to a negative reputation associated with a carbon-intensive subsector. → Fall in demand for carbon-intensive transport due to movements and pressure from consumers such as #flightscam in Europe.	→Changing consumer preferences can reconfigure the use of transportation modes. →Reduced demand for carbon-intensive transport leads to price volatility. →Increased cost of capital for carbon-intensive transport companies. →Loss of value of assets with a negative reputation. →Difficulty attracting customers given changing consumer preferences and stigmatization of carbon-intensive transportation.
Physical risks			
Acute risk	→High intense rainfall generates hydrological (floods, avalanches) and geotechnical (landslides, avalanches) risks. →Prolonged low rainfall causes water stress, drastically reducing the flow of rivers and causing them to disappear. →Increase in fires: dryness due to lack of rainfall and high temperatures facilitates the rapid spread of fires. →The increase in global temperature intensifies and makes heat waves more frequent.	→Adverse weather events affect production, distribution and marketing, hindering the efficiency of production processes. →Extreme weather events reduce livability and the ability to work outdoors or move freely. →Adverse weather events destroy and disrupt the operation of physical assets and service infrastructure.	→Increase in transportation costs due to new security measures to face adverse weather events. →New routes that may be longer or inefficient due to adverse weather events on the usual routes. →Unpaved roads are vulnerable to climatic factors, especially to increasing intense rainfall that generates landslides and a disruption of supply chain →Increased adverse weather events can increase shipping and transportation costs for all stages of the supply chain.
Chronic Risk	→Sea level rise affecting the entire coastal region of the country. →The accelerated increase in temperatures affects the structure and regenerative capacity of ecosystems, reducing services such as water resources and carbon storage. →Global temperature increase affects climate prediction and causes instability. →Variations in water availability alter the frequency and intensity of rainfall in the long term.	→Adverse weather events cause disruptions in production, distribution and marketing, hindering the efficiency of production processes. →Extreme weather events reduce livability and ability to work outdoors or move freely. →Adverse weather events destroy and disrupt the operation of physical assets and service infrastructure.	→Increased costs of tickets for commercial travelers and cargo freight due to hostile weather situations. →Increased need for cooling systems and associated costs in underground transport systems due to rising temperatures. →New costs in maintenance and redesigns of paved roads due to degradation due to temperatures exceeding design thresholds. →Increased costs of training for climate event preparedness and mitigation in transportation infrastructure.

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To address the different risks listed above, Banco de Occidente is analyzing different financial products and services such as:

Potential financial products and services derived from climate change



Some of these actions have been explored through the opportunity evaluation process and have materialized through Banco de Occidente's sustainable financing, which can be found in the following subchapters of the report.

Opportunities arising from climate change

With the aim of moving forward with the identification of opportunities arising from climate change, in 2023 we led a comprehensive analysis that included the identification of best market practices, the mapping of existing initiatives in the Bank, and the definition of a roadmap that will allow us to advance in decarbonization and climate resilience in our operations and portfolio. In this sense, the main opportunities that allow the control and mitigation of the organization's financial risks are:

Decarbonization and Resilience Roadmap Opportunities

Financial Risk Identified*	Opportunity (A)Adaptation (M) Mitigation	TCFD Opportunity Type	Metric	Level of progress in taking advantage of this opportunity
R1, R3 (yellow)	(A) Establish criteria for the subscription of loans and refinancing for customers belonging to sectors vulnerable to extreme weather events.	Resilience	% = Criteria Lines of Credit / # Total Lines of Credit	●
R4, R6 (red)	(A)Include in the short, medium and long-term projections of cash flow scenarios, the materialization of extreme weather events.	Resilience	Short-term projections Medium-term projections Long-term projections	●
R2, R3 (red)	(A_M) Design of credit lines for the financing of climate emergencies	Products and services	% = Lines designed with emergency financing / segment Reduced indirect GHG emissions	●
R9, R10 (yellow)	(A_M) Establish criteria, policies, and/or programs for the procurement of sustainable goods and services at the Bank	Resilience Resource efficiency Energy sources New markets	% = # low-carbon purchased goods and services / # total goods and services	●

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Financial Risk Identified*	Opportunity (A)Adaptation (M) Mitigation	TCFD Opportunity Type	Metric	Level of progress in taking advantage of this opportunity
R5, R7, R8, R10 (yellow)	(A_M) Financing of sustainable and low-carbon initiatives: sustainable mobility, technological innovation, green bonds, clean energy, energy efficiency, nature-based adaptation, among others.	Products and services	% = sustainable financing / total financing Reduced GHG emissions	●
R10, R12 (yellow)	(A_M) Actively participate in public policy and regulators' projects on climate change	Resilience	# Requirements Managed / # Requirements # Participation in events/ events identified in the surveillance # pronouncements/ regulations identified in the surveillance	●
R4, R6 (red)	(A_M) Program for the management of climate risks in customers	Products and services	Designed program #Customers taking the program / # Total customers	●
R7, R8 (red)	(A_M) Program for mitigation, compensation and decarbonization in customers	Products and services	Designed program #Customers taking the program / # Total customers Reduced emissions	●
R5, R7, R8, R10 (red)	(A_M) Green services: technical advice and programs that promote the sustainable use of resources.	Products and services	% = green services / total services Customer certifications and/or accreditations Reduced GHG emissions	●

Opportunity utilization level

- ● Advanced
- ● Under development
- ● Under review

Sustainable financing

With the aim of taking advantage of the different opportunities arising from climate change, mitigating the financial risks we face, and accompanying our clients in the transition to decarbonization, during 2024 we developed our Sustainable and transition Taxonomy, based on Colombia's Green Taxonomy and the taxonomy designed by IDB Invest. It has 9 eligibility categories that are financed under our credit modalities and cover issues such as energy, waste management, agriculture, mobility, construction, eco-efficiency, nature conservation, among others. These categories include measures from mitigation to adaptation and have previously established indicators and calculation methodologies for their adequate monitoring. During 2025, it is expected to formalize and disseminate this Taxonomy with the different stakeholders to generate transparency in these matters.



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Detail of Banco de Occidente's Sustainable and Transition Taxonomy

Eligibility Criteria	Description	Short-Term Opportunity
Energy efficiency	Automation and control of electrical and mechanical systems. Heat recovery for hot water (from air conditioning systems, heat or refrigeration pumps, air compressors). Upgrades of air conditioning and refrigeration equipment by introducing refrigerants with very low global warming potential – GWP. Projects for the use of biofuels or biogas.	x
Renewable energy	Companies that design, sell, and install renewable energy solutions (excluding consumer finance). Wind energy (residential, commercial and industrial) in distributed applications (no grid supply), direct mechanical applications or grid supply.	x
Green buildings	Green buildings, including housing and social housing and commercial buildings, certified under the eligible sustainability certifications LEED Gold or higher or LEED for Neighborhood, Casa Colombia or other associated certification.	x
Sustainable water management	Aqueduct systems: New integral systems or improvements to existing systems of collection, adduction, treatment, storage, conduction and distribution. Systems and technologies that generate a reduction of at least 20% in annual water consumption	x
Waste management	Initiatives for the collection and cleaning of recovered materials, initiatives for returnable packaging systems. Design and implement post-disaster reconstruction recovery plans with climate change considerations. Heat chains that support small producers and local agriculture.	x
Clean transport	Public or personal hybrid or electric vehicles, vehicles that run on vehicular natural gas. Inter-municipal freight vehicles with zero direct emissions Construction and maintenance of transport projects with zero direct emissions including their key components and supporting infrastructure on subways, buses, trams, trains etc.	x
Sustainable agriculture	Good livestock practices such as livestock feed management, animal selection and improvement, breeding to improve animal production. Sustainable agriculture: agricultural inputs including seeds and fertilizers, sustainable agricultural production focused on the protection of ecosystems.	x
Protection of biodiversity and natural resources	Development of sustainable forest management practices such as seed tree protection, census and mapping of commercial trees, forest protection. Protection and restoration of terrestrial and freshwater ecosystems, biodiversity, habitats and soil. Disaster Risk Reduction and Climate Adaptation Projects	x

Resilience of the climate change strategy

Recognizing the variability of information around climate change and its possible impacts, Banco de Occidente has sought to implement different initiatives that allow us to guarantee our resilience:

A. Regularly update and revise the assessment of risks related to climate change using the prioritized scenarios.

B. Analyze and assess portfolio exposure by sector and geography to prioritize the segments that are most vulnerable to climate change.

C. Regularly analyze the opportunities arising from climate change for the Bank.

D. Socialize the different risks and opportunities with the areas in charge to promote knowledge within the Bank and generate greater ownership.

E. Coordinate awareness and training spaces in key areas.

F. Seek advice from teams of experts on these issues to review action plans and internal initiatives.

G. Respond to the most material risks through measures to avoid, prevent or mitigate.

These actions have allowed us to generate the necessary internal capacities to guarantee the resilience of our climate change strategy in the face of the different impacts or risks that may materialize.

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Risk Management

Integration of processes to manage climate risks and opportunities into comprehensive risk management

Based on the relevance of climate risks for Banco de Occidente and the vulnerability of our portfolio, we have sought to align this exercise with the organization's risk culture. This process is documented in our Risk Appetite Framework and consists of:

Comprehensive risk management



1. **Identification of risks:** mapping the climate risks related to the business plan by contemplating both the qualitative and quantitative.
2. **Measurement of risks:** measuring each of the risks under stress scenarios.
3. **Definition of appetite and caps:** define the entity's risk appetite and operational caps.
4. **Strategic and business alignment:** developing a strategic plan that includes projections, risk appetite, strategic objectives, among others.
5. **Monitoring and deviation analysis:** monitor the appetite, the strategic plan and business strategy.

Based on this management, we have involved the Vice Presidency of Risk and Collection in the different stages of identification and measurement of risks related to climate change. In addition, several days have been held with the teams in charge to socialize the TCFD framework and raise awareness among the teams about the related knowledge.

In our risk management, the risk identification stage is where we have presented the highest level of alignment and where much of our efforts have been focused. During 2025 we will continue to work to articulate the measurement of risks, the definition of appetite and the limits since it is a process that is constantly iterating and that is expected to continue maturing in the coming months, as we continue to accompany our clients in the management of climate change and with the continuous monitoring of the established climate indicators.

In line with the appetite and limits definition stage, the last two stages of comprehensive risk management will continue to be strengthened and increasingly adjusted, so that the actions taken on climate are aligned with the defined climate strategy and fully articulated with the bank's business model.



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Climate risk identification, prioritization and assessment processes

In order to identify, prioritize and assess climate risks, we developed 4 fundamental steps:

1. Identify a list of risks and opportunities:
   - A. Analyze market peer trends, regulations, and national commitments.
   - B. Review the sectoral profile, emissions generated and vulnerability, among other characteristics.
   - C. Explore the processes, roles, and responsibilities of the different teams involved in these matters.
   - D. Align the risks and opportunities identified with the classification proposed by the TCFD.
2. Assess and prioritize risks and opportunities based on chosen criteria:
   - A. Prioritize climate scenarios to make the assessment.
   - B. Assign parameters for each of the climate risks and their associated financial impact.
     - Parameter: is an external, scenario-driven data point that indicates climate financial risk. For this case, the database of the "NGFS Scenario Explorer Hosted by IIASA release 2.2" and the "Climate Impact Explorer — Climate Analytics" were used.
     - Financial impact: the bank's internal financial metric that will be affected by climate risk.
   - C. Rate each risk according to the selected metrics based on the chosen climate scenarios:
     - Confidence level: qualitative rating of the reliability of the source and the quality of the parameter.
     - Scenario sensitivity: A measure of the divergence of the parameters in the two scenarios (greater divergence means a less certain risk trend).
     - Probability of parameter change: rate of change of the parameter (a higher rate of change suggests a higher probability).
     - Time horizon: The timeframe in which financial impacts reach a predetermined threshold.
   - D. Prioritize risks under methodologies for assigning weights relative to each of the metrics by a panel of expert consultants and subjective prioritization according to the appropriation of knowledge on climate change and the operation of the bank, where a hierarchical organization is carried out. The result of this prioritization is the integration of both methodologies in a *"Materiality vs Certainty"* scheme, where the valuations of the metrics are grouped:
     - Materiality: Simple average of the *"time horizon"* metric averaged in each climate scenario, for a specific parameter/variable. If there are several parameters associated with the same risk, materiality will be the result of the simple average of the *"time horizon"* metrics averaged for each parameter.
     - Certainty: Simple average of the metrics *"confidence level"*, *"probability" and "sensitivity"*, averaged in each climate scenario, for a specific parameter/variable. If there are several parameters associated with the same risk, the Certainty will be the result of the simple average of the metrics *"confidence level"*, *"probability"* and *"sensitivity"* averaged for each parameter.
3. Quantify the financial value for prioritized risks and opportunities
   - A. Understand and adopt the stochastic, non-deterministic methodology developed by Ecoacciones.
   - B. Identify the climatic parameters associated with their cause or origin, analyzing not only historical but also projected behaviors.

4. Manage risks through control and mitigation actions of previously identified findings

   A. Involve the areas to identify with those responsible, the risks of the processes and their mitigation mechanisms in charge of each of the identified risks.

   B. Implement business continuity strategies to address risk in the event of a crisis event

   C. Train employees in the existing mechanisms to react and adapt to extreme events.

   D Analyze, evaluate and adjust the proposed actions aimed at mitigating the materialization of events, reducing the levels of exposure to operational risks.

   E. Present the progress and changes to the SARO Committee and the Integral Risk Committee of the Board of Directors.

Process of identification and assessment of risks arising from climate change

To develop the analysis of climate-related financial risks, we selected 3 Climate Scenarios *Network for Greening the Financial System (NGFS)* that allow us to understand the implications of market, regulatory, technological decisions and the aggressiveness or magnitude of extreme weather events.

NGFS Climate Scenarios

			Risks			
Category	**Scenario**	**Estimate**	**Political reaction**	**Technological change**	**Carbon Dioxide Removal**	**Variation in regional policy**
Orderly	Net Zero	1,5°C	Immediate and gentle	Quick change	Medium Usage	Average change
	Below 2°C	1,7°C	Immediate and gentle	Moderate change	Medium Usage	Low variance
Disorderly	Zero Net Divergent	1,5°C	Immediate but divergent	Quick change	Low use	Average change
	Disorderly transition	1,8°C	Delayed	Fast or slow change	Low use	High variation
Hot house world	Nationally Determined Contributions (NDCs)	~2.5 °C	NDCs	Slow change	Low use	Low variance
		+3°C	None — current policies	Slow change	Low use	Low variance

Source: NGFS (2025) and WEF (2023)

In order to prioritize and assess the financial risks derived from climate change, at Banco de Occidente we prioritize three (3) scenarios proposed by NGFS:

- Orderly transition: It is also known as the Net Zero 2050 scenario. This scenario contemplates high transition risks due to the implementation of rigorous measures and regulations immediately and low physical risks because emissions and impacts on the environment are limited. This scenario foresees a temperature increase below 1.5°C by 2100. Although it is estimated that the world has already surpassed the aforementioned temperature increase, this is a scenario that guides best business practices to avoid, reduce and mitigate the impact on the climate.
- Disorderly transition: assumes that global emissions do not decrease until 2030, rigorous policies begin to be implemented from that year and there is a large difference in policies and ambitions by country, which hinders progress at the global level to combat climate change. In this scenario, the global temperature increase is limited to 1.8°C by 2100.
- Hot house world: it is assumed that the different countries maintain the policies that have been implemented so far, which implies high physical risks and low transition risks. An increase in global warming of +3°C is projected by 2080.

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Managing climate change–related risks

Beyond identifying, evaluating, and recognizing the risks derived from climate change, at Banco de Occidente we seek to manage them in the most appropriate and articulated way between different areas. In this regard, we developed a comprehensive roadmap for decarbonization and climate resilience that aims to define a framework for action at the Bank to manage physical climate risks and the transition to a low-carbon economy in accordance with the recommendations of the TCFD framework.

This roadmap takes into consideration:

1. **Climate risks and impacts:** physical and transition risks prioritized with the financial impact that may materialize in the climate scenarios evaluated to 2050.
2. **Opportunities:**opportunities to manage climate risks that may have a focus on GHG emission mitigation (M) and/or climate adaptation (A).
3. **Metrics, monitoring and follow-up:** dwe defined the following variables for each of the prioritized financial risks: metrics for opportunities, implementation goal, traffic light monitoring and alert, responsible for monitoring, frequency of monitoring, who is communicated, frequency of communication and estimated costs with respect to the implementation of opportunities.
4. **Evaluation:** Starting in 2025[3], we will periodically conduct an evaluation of the implementation or effectiveness of the portfolio.

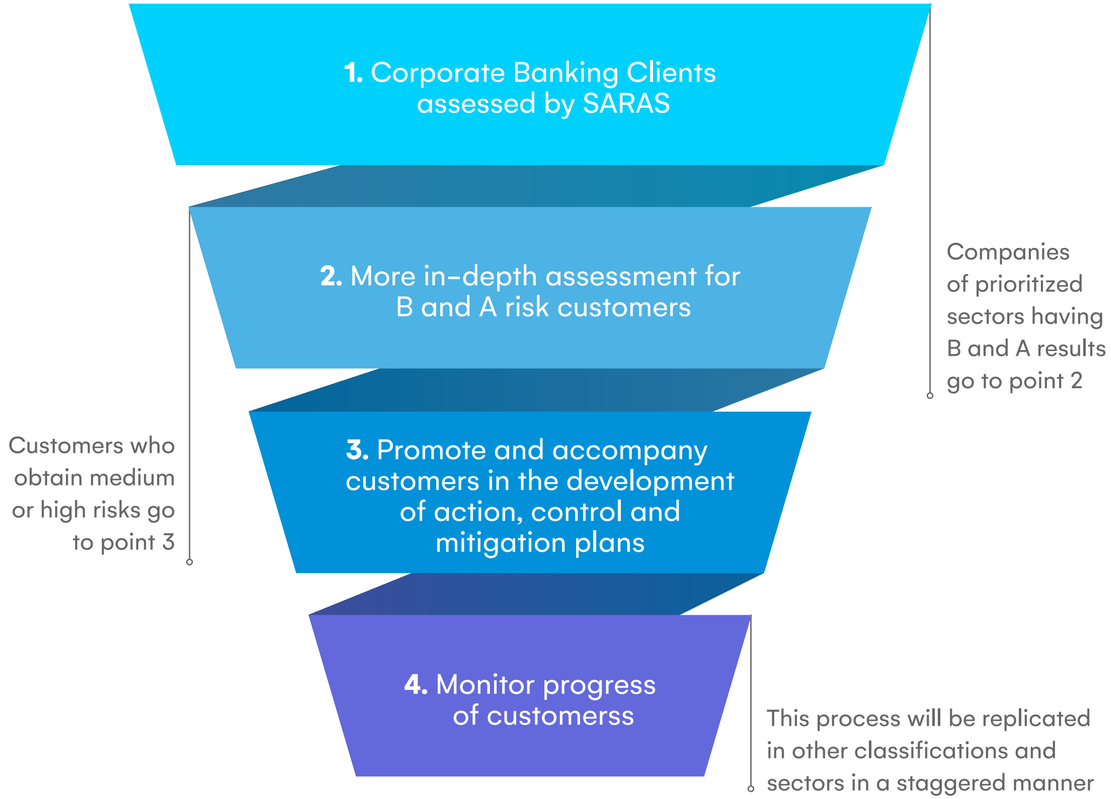
For each of the risks identified, the areas in charge will establish controls, mitigation and adaptation plans that guarantee the resilience of Banco de Occidente's operations in extreme events or challenging situations derived from climate change.

Implementation of SARAS

Since 2023 we have developed the Environmental and Social Risk Management System (SARAS) to address sustainability issues in our lending operations. It has a set of policies, guidelines, tools, and processes that allow the identification, evaluation, mitigation, and monitoring of the environmental and social risks of a project or economic activity.

By 2025 we will be integrating climate change criteria into SARAS, with the aim of addressing these latent risks in a phased manner for the most priority sectors such as: civil engineering works and construction of buildings, production of food products and supply of electricity, gas, steam and air conditioning, hydrocarbons, power generation and mining, among others.

Implementation of SARAS



To consult Banco de Occidente's sustainable finance guidelines, click here.

[3] This goal was modified by Banco de Occidente's internal processes and procedures.

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Metrics and objectives

In order to monitor the progress and challenges against the commitments we have at Banco de Occidente, we have established processes, procedures, and internal teams in charge of managing different indicators that allow us to move towards the goals we have set for ourselves.



GHG Reporting, Scope 1, 2 and 3

As part of our environmental commitments, in 2022 we reviewed the Science Based Targets initiative (SBTi) methodology to chart the trajectory of our Greenhouse Gas (GHG) emissions in scopes 1, 2 and 3. In scope 3, we include financed emissions and carry out an analysis of the exposure of our portfolio to different climate scenarios.

As part of our main actions to reduce our GHG footprint, we implemented responsible practices in the use of resources such as energy, paper and water. One of our priority focuses has been the energy efficiency project in our offices, as well as the sustainable construction and remodeling of our facilities. The approved activities for the reduction of energy and fuel consumption were evaluated in 2023 and began to be implemented in 2024. In addition, we have adopted measures focused on the management and reduction of waste generation, ensuring its correct disposal.

GHG reduction target

A Starting in 2022, in relation to our environmental commitments, we set a target year and committed to reducing our scope 1 and 2 emissions by 4.7% per year on a linear basis until 2030. This target will allow us to reduce GHG emissions by 42% by 2030 and offset the remaining 58% through forestry and energy programs in the carbon market.

In addition, we have set a final goal of achieving carbon neutrality by 2050, both in our direct and indirect emissions. To achieve this, we plan to offset our emissions through green restoration programs, establish more energy efficiency initiatives, and other initiatives to be implemented with recognized entities with expertise in the field. These programs not only include offsetting emissions, but also the adoption of clean technologies and the promotion of sustainable practices throughout our operations.

Calculation methodology

The measurement of our footprint adheres to and fully meets the requirements of the Green House Gas Protocol (GHG Protocol). This metric has a focus on consolidating operational control and, due to the emission sources identified in our operational processes, CO2, CH4, N2O, SF6, HCFs and HCFCs are included in the calculation.

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GHG emissions intensity

Emissions intensity by scope 1, 2 and 3 annually

Concept	2021	2022	2023	2024
Scope 1 (A1) emissions (tCO2e)	2.010,22	1.540,20	1.379,49	1.104,2
Employees	7.151	7.113	6.984	7.020
GHG emissions intensity Scope 1	0,28	0,22	0,20	0,16
Scope 2 (A2) emissions (tCO2e)	1.694,59	1.396,26	1.992,65	2386,03
Employees	7.151	7.113	6.984	7.020
GHG emissions intensity Scope 2	0,24	0,20	0,29	0,34
Scope 3 (A3) emissions (tCO2e)	14.003,62	6.103,38	4.023,15	3547.63
Employees	7.151	7.113	6.984	7.020
GHG emissions intensity Scope 3	1,96	0,86	0,58	0,50
Total emissions A1+A2+A3 (tCO2e)	17.708,43	9.039,84	7.395.3	7.038,2
Employees	7.151	7.113	6.984	7.020
GHG emissions intensity Total	**2,48**	**1,27**	**1,06**	**1,00**

Reduction of annual emissions

The GHG emission reductions observed represent the following percentages:

Annual emissions reduction 2023 and 2024

	2023 (Percentage reduction compared to 2022)	2024 (Percentage reduction compared to 2023)
Scope 1	10%	20%
Scope 2	-43%	-20%
Scope 3	34%	12%
Total	**18%**	**5%**



We achieved a reduction in our scope 1 emissions, mainly due to the decrease in fuel consumption from mobile sources, the reduction of refrigerant gases from air conditioners and the change from HCFC 123 fire extinguishers to CO2 extinguishers. We also continued with preventive maintenance of air conditioners, which contributes to reducing fugitive emissions.

Despite the decrease in energy consumption at our facilities during 2023 and 2024, the emission factor provided by XM for the National Interconnected System had a variation of 53.76% for 2023 compared to 2022 and 22.86% for 2024 compared to 2022, which affected our scope 2 emissions. This increase is mainly attributed to the effects of the El Niño phenomenon, which reduced water inputs during the rest of the year, leading to an increase in thermal generation to meet national energy demand.

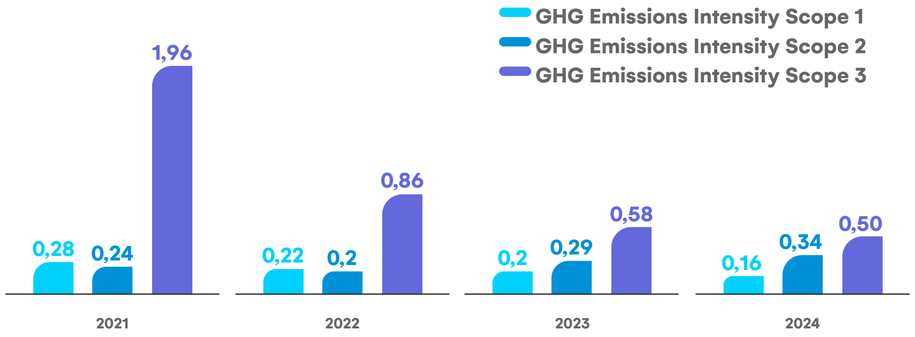
We managed to significantly reduce our scope 3 emissions, mainly due to the decrease in corporate flights. To achieve this, we intensified the dissemination and reminder of our travel expense policy, working closely with all areas to efficiently manage the budget and reduce the number of trips made.

In addition, paper consumption, waste generation, purchases of goods and transportation of employees to and from the Bank were reduced. The latter aspect has been supported by both the hybrid work scheme and the sustainable mobility program.

Overall, our total emissions showed a reduction of 18.19% for 2023 and 4.83% for 2024 as a result of the initiatives and actions undertaken during these years.

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Emissions Intensity Scope 1, 2 and 3



Emission management targets:

Within the framework of the National Carbon Neutrality Strategy, the Bank has been fulfilling and strengthening its commitment to carbon neutrality. To this end, we have created an Emissions Management Plan, which acts as the main instrument for the implementation of emission reduction and control measures. In recognition of our efforts, we have received the Carbon Neutral Certificate granted by the Colombian Institute of Technical Standards and Certification (ICONTEC). This plan establishes the objectives for the management of emissions in the short, medium and long term:

Short term (1 year):

- Develop the roadmap to reduce electricity consumption by 2.5% each year from the base year 2022, as well as the reduction of 0.5% in the indicator of emission from direct sources for fuel consumption.
- Develop the roadmap to reduce emissions from refrigerant gas leaks by 15% by 2025 from the base year 2022.
- Carry out an annual measurement and analysis of the emission indicators, taking into account the results obtained during the evaluation period.
- Carry out all the actions established in this report.
- Define corrective actions, in accordance with the annual evaluation of the monitoring indicators.

Medium term (3 years):

- Carry out an analysis of the behavior of emissions in the short term by reviewing the trend of the emission indicators contained in the carbon neutral plan, with the aim of adjusting the plan if necessary.
- Evaluate the inclusion of new actions with high reduction potential, in accordance with the objectives achieved in the 2024–2025 period.
- Define corrective actions, in accordance with the annual evaluation of the monitoring indicators and the annual decarbonization protocol.
- Align the objectives and goals of this plan with what the Decarbonization Protocol establishes.

Long term (more than 4 years):

- Carry out an analysis of the behavior of emissions in the medium term by reviewing the trend of the emission indicators contained in the carbon neutral plan, with the aim of adjusting the plan if necessary.
- Evaluate the inclusion of new actions with high reduction potential, in accordance with the objectives achieved in the 2024–2027 period.
- Define corrective actions, in accordance with the annual evaluation of the monitoring indicators.
- Comply with the objectives and goals of this plan as established in the Decarbonization Protocol.

Action Plan

Recognizing the importance of further advancing and improving climate risk management and integrating sustainable practices across our operations, we have outlined a number of future actions to strengthen our capacity to respond to climate challenges.



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Governance

The responsibilities and functions assigned for climate risk management, as well as the frequency of meetings, have been identified and implemented since the definition of the bank's Climate Governance. This ensures that each area and team has a clear understanding of their roles in this area.



A. Teams in charge of climate change risk and management issues

Roles, responsibilities and job functions for managing climate change are being continuously evaluated to ensure their relevance and effectiveness. In the context of updating this report, we are undertaking a comprehensive reassessment of roles within climate risk management. This process aims to identify opportunities for improvement and ensure that our practices are aligned with the best international regulations and standards.

Despite this reevaluation, the integral functions of our Sustainability, Risks, Human Talent, Administration and Commercial areas continue to operate in accordance with the previously defined responsibilities and objectives. These areas have proven to be central to our strategy to address climate challenges and will continue to play a key role in identifying, assessing and mitigating the risks associated with climate change.

B. Training Programs

In the same way as the roles and responsibilities of the teams, training programs in relation to risks and climate change are in a process of revision. This effort aims to comprehensively train the teams involved and ensure an effective integration of climate change management in all areas of the bank.

These revised training programs will include a variety of components designed to provide a deep and practical understanding of climate challenges. These include:

- General trainings: Informative sessions aimed at all bank employees, focused on providing a solid foundation on the fundamentals and importance of climate risk management.
- Specialized workshops: Specific workshops for key teams and departments, which will address advanced topics and provide practical tools for the implementation of sustainable strategies and constant learning about relevant topics and trends.
- Networking spaces: Internal forums and seminars aimed at sharing our climate-related policies, frameworks, and publications. These spaces will encourage the exchange of ideas and collaboration between different areas of the bank.
- Training scheme for Senior Management: Training programs for Senior Management will be implemented, focused on providing advanced knowledge for climate risk management in the Bank.

C. Remuneration incentives

Based on the best practices in the market, we recognize that one of the key actions to accelerate the implementation of the Bank's climate strategy is to generate incentives in senior management and employees. To this end, since 2023 we have been evaluating the most appropriate methodology to integrate climate change into the remuneration and incentive scheme managed by the Bank. In 2025, we will focus mainly on defining the characteristics and criteria of short- and long-term incentives along with the internal beneficiaries, the most appropriate type of incentive, and the metrics that allow us to monitor progress.

Roles, responsibilities and job functions for managing climate change are being continuously evaluated to ensure their relevance and effectiveness.

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Strategy

Recognizing the importance of aligning understanding, processes and guidelines at Banco de Occidente, we are in the process of reviewing some initiatives that will allow us to strengthen our approach and management of climate change.

A. Risks arising from climate change:

Taking into account that climatic conditions, predictions and geographical realities vary to the extent that there is more research, knowledge and experience, we have undertaken some internal measures that allow us to strengthen, align and institutionalize internal processes to integrate the analysis of risks derived from climate change into the company's comprehensive management of strategic risks. In addition, we will periodically update the risk and opportunity mapping, including detailed analyses of the sectors that make up the portfolio, their geography and the possible impact on our operations. In this sense, we seek to establish the appropriate methodologies to collect and process information based on international guidelines and guides to incorporate the best practices in the market.

B. Assessment of the impacts of climate change:

We are training our teams and strengthening internal capacities to quantitatively assess the actual or potential impacts that arise as a result of the materialization of climate change–related risks. These processes will contemplate different time horizons and can be segmented by location, economic sector, among other details that will be useful to make more informed decisions.

C. Strengthening the Climate Strategy:

We will continue to socialize and strengthen our Climate Strategy so that Banco de Occidente's employees fully understand the action fronts, commitments, actions and measures that are being taken within the framework of this corporate guideline. Likewise, we will seek to incorporate the appropriate initiatives that allow the Strategy to adapt to the changing realities we face as a society.

Risk Management

In order to continue incorporating climate risk measurement into Banco de Occidente's overall operations, we are exploring different measures that permeate processes and procedures that have been adopted and appropriated by the teams in charge.

Define appropriate internal frameworks and methodologies:

In the course of 2025, we hope to move forward with the creation of an annex to the general risk model that specifies the assessment, methodologies, and guidelines for climate risks. We will also be evaluating the relevance of classifying climate risk as a strategic risk at the corporate level along with the definition of the Bank's appetite and its operational limits.

Complementing the aforementioned exercises, expert consulting will deepen the strengthening of the comprehensive management of climate change while integrating climate risks into the organization's SARAS. In addition, we will work on the construction and implementation of a strategic plan that allows us to understand, advance and mitigate the prioritized risks with metrics and KPIs that enable the monitoring and supervision of climate risks.

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Metrics and objectives

A. Actions to achieve decarbonization targets

Scope 1: Direct emissions

Emissions generated by sources owned or controlled by the Bank.

Actions to decarbonize Banco de Occidente's operations (scope 1)

Emissions from fixed sources	
1. Monitoring fuel consumption by emission source	→ Monitoring of fuel flows in the organization's consumption areas. → Mapping of consumption sources based on monitoring. → Areas and equipment with potential to reduce consumption in the future. → Feasibility of implementing reduction or control strategies.
2. Study to evaluate the inclusion of voluntary biofuel blends	→ The mixture of diesel and biodiesel is relevant to reduce emissions from fuel burning. → Technical study to evaluate the use of biofuel mixtures in stationary equipment. → Identify biofuel technology suppliers.
Emissions from mobile sources	
3. Study to evaluate the conversion of vehicles to electric or biogenic fuels	→ Using electricity can significantly reduce emissions.
4. Evaluate the inclusion of selection criteria for suppliers that provide vehicle leasing services	→ Establish selection criteria for vehicles acquired or leased from the time of contracting. → Select suppliers that offer lower-emission alternatives.
Emissions from process leakage	
5. Periodic maintenance of air conditioners, refrigerators and fire extinguishers	→ Continue to develop periodic preventive maintenance of refrigeration equipment. → Monthly inspections of fire extinguishers and scheduled preventive maintenance of equipment.
6. Conventional refrigerant conversion	→ Alternatives with a lower environmental impact than conventional refrigerants. → Refrigerants with very low global warming potentials for refrigerators, air conditioners and cold rooms.

Scope 2: Indirect emissions

Emissions from energy consumption are the most representative in our inventory, due to our operational capacity, the number of employees and operating times. For this reason, we present below a series of strategies to evaluate to reduce emissions associated with energy consumption.

Actions to decarbonize Banco de Occidente's operations (scope 2)

Indirect emissions	
1. Energy efficiency study	→ Energetically characterize each site according to its operational characteristics. → Identify opportunities for savings and more efficient uses of energy. → Use good operational practices and possible technological changes
2. Acquisition of solar plant	→ Resume the pertinent studies to evaluate the feasibility of implementing solar plants in offices.
3. Changes in lighting systems due to LED technology	→ Continue with technological reconversion and strategies to reduce energy consumption in offices and outdoors.

B. Process of defining metrics and objectives

A significant part of the risks identified correspond to climate risks that can be transformed into credit risks. Recognizing that climate change requires an iterative approach, the Bank has decided to take its first steps to address and manage the following risks: The bank's lack of alignment with the sustainable preferences of its customers and the increase in the bank's costs due to the incorporation of low-carbon technologies. To address these challenges, the following metrics and objectives have been established:

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Objectives of the Climate Strategy:

- Minimum annual reduction of 4.7% of scope 1 and 2 GHG emissions annually.
- Total reduction of 42% of scope 1 and 2 GHG emissions by 2030.
- Achieve carbon neutrality by 2050.

Eco-efficiency goals for 2030:

- Reduce energy consumption in the Bank's facilities by 20%.
- Reduce water use in the Bank's facilities by 10%.
- Use 100% renewable energy sources for the Bank's facilities.
- Reduce waste generation in the Bank's facilities by 25%.
- Reduce the use of paper in the Bank's facilities by 25%.

On the other hand, to mitigate the risks associated with the portfolio, progress is being made in the development of opportunities through our credit lines. This allows us to accompany, advise and encourage clients in their transition to more sustainable and climate-resilient practices. Additionally, with regard to portfolio management, we will continue to deepen the analysis of sectoral exposure and by geography.

Annex 4. Consolidados / Separados Financial Statements

VIGILADO SUPERINTENDENCIA FINANCIERA BANCO DE OCCIDENTE S.A. FIGURA



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