



POLICY FOR THE PREVENTION OF SEXUAL HARASSMENT AND VIOLENCE IN THE WORKPLACE

1. INTRODUCTION

At Banco de Occidente, we are committed to maintaining a safe and healthy work environment. Therefore, we reject any type of sexual harassment or violence in any of its manifestations within the work context. In accordance with the above, we reiterate our commitment to zero tolerance with respect to these behaviors, demanding that our employees respect the rights and dignity of people, without distinction.

This Policy establishes the route to be followed to prevent, protect and correct acts of alleged sexual harassment and/or violence in the workplace.

2. OBJECTIVE

Regulate the different mechanisms for the prevention, protection and correction of alleged harassment and/or sexual violence that may occur, promoting respectful and consensual interactions among employees.

3. SCOPE

This policy is applicable to all Bank employees, whether they are direct workers, workers on mission, contractors, students in training, including interns, without any discrimination based on gender, age, religion, ethnicity, sexual orientation, gender identity, position, seniority or any other personal or work condition. It is also applicable to customers, users and/or visitors, since the latter will be understood to be part of the work context.

The Bank will keep complaints and investigations confidential, and information will be strictly disclosed in cases where there is a need to know it.

4. LEGAL FRAMEWORK

- Political Constitution of Colombia.
- Law 599 of 2000.
- Law 1010 of 2006.
- Law 1257 of 2008.
- Law 1719 of 2014.
- Decree 1072 of 2015.
- Law 2365 of 2024.
- Other concordant regulations that modify, replace or replace those previously mentioned.





5. DEFINITIONS

Sexual harassment in the workplace context: Sexual harassment in the workplace in terms of Law 2365 of 2024, will be understood as any act of persecution, harassment or harassment, of a sexual, lewd or libidinous nature or connotation, which is manifested by vertical or horizontal relationships, conditioned by age, sex, gender, sexual orientation and identity, the employment, social, or economic position, which is given one or more times against another person in the work context.

Workplace harassment: Workplace harassment in the terms of Law 1010 of 2006 is understood as any persistent and demonstrable conduct exercised on an employee aimed at instilling fear, intimidation, terror and anguish, causing labor damage, generating demotivation at work or inducing resignation from work. The foregoing, warning that the conduct can be exercised between co-workers of the same hierarchical rank, or of a lower or higher one.

Labor Coexistence Committee: The Labor Coexistence Committee is the internal body, composed of representatives of the employees and the Bank, which has the function of formulating recommendations and plans for improvement in relations between the parties in order to build, renew and promote labor coexistence, guaranteeing in all cases the principle of confidentiality of the complaints received. This Committee does not have the power to determine the existence or not of workplace and/or sexual harassment, since it is constituted as a body to facilitate the resolution of conflicts within the Bank.

6. RELEVANT ASPECTS OF SEXUAL HARASSMENT

a. Modalities:

Sexual harassment in the workplace is unwanted conduct of a sexual nature in or on the occasion of the workplace, which makes the person feel offended, uncomfortable, humiliated and/or intimidated.

The following behaviors are considered sexual harassment:

- **Physical sexual harassment:** Groping or touching, unnecessary approaches, pinching, slapping, squeezing, caressing, deliberate rubbing, unnecessary physical contact, physical aggression, lewd or obscene looks, winking, pursuing and/or intentionally impeding passage, among others.
- **Verbal sexual harassment:** Whistling, verbal expressions, kissing sounds, comments, jokes and innuendos and questions of sexual connotation. Insults based on the person's sex, sexual identity or orientation, or on sexual stereotypes related to race or ethnicity and ratings about the person's sexuality.
- **Gender/sexual orientation harassment:** Gender-based or sexual orientation harassment is considered to be any behaviour carried out on the basis of a person's gender, sexual identity or orientation and with the purpose of violating their dignity and creating an intimidating, degrading or offensive environment.
- **Non-verbal sexual harassment:** Exhibition of photos, images, videos or audios of sexual and/or pornographic connotation. Exhibitionism, masturbation in public, photos of





the body without consent or presentation of pornographic objects.

b. Presumption of sexual harassment in the workplace:

It will be understood that the interactions of collaborators, contractors, interns, clients, users and/or visitors, suppliers and other people who participate in the work context are part of the work context, regardless of the nature of the relationship.

It will be presumed that the conduct was committed in the work context when it is carried out in the following spaces or contexts (Art. 7 Law 2365 of 2024):

- The workplace or where the contractual relationship is developed in any of its modalities, including in public and private, physical and digital spaces when they are a space to develop the assigned obligations, including working from home, remote work and teleworking.
- Places where remuneration is paid as a result of work or work entrusted to them in any of the contractual modalities, where they take their rest, in the rooms designated for the dining room, or where sanitary, toilet and changing room facilities are used.
- Travel, trips, events or social or training activities related to work or the work entrusted to them in any of its modalities.
- Within the framework of communications that are related to the work or the work entrusted, including those made digitally or in the use of information and communication technologies.
- Journeys between the home and the place where the work or the work entrusted to it in any of its modalities is carried out, when the sexual harassment is committed by a person who is part of the work context.
- In the accommodation provided by the employer, when the sexual harassment is committed by a person who is part of the work context.

Engaging in conduct that constitutes sexual harassment will be classified as a serious offense by the employee and may lead, after the corresponding verification, to the imposition of a disciplinary sanction or the termination with just cause of the employment contract in accordance with numeral 6) of paragraph a) of article 62 of the C.S.T. a rule substituted by Article 7 of Decree 2351 of 1965.

7. INTERNAL PROCEDURE IN CASE OF COMPLAINTS ABOUT ALLEGED SEXUAL HARASSMENT IN THE WORKPLACE

Any employee may file a complaint with the Directorate of Labor Relations for the DG and Cali Zone, the Human Talent Management for the DG and Bogotá Zone and the Human Talent Directorates for the Medellín and Barranquilla Zones, through physical communication or email; These areas shall receive and carry out the corresponding investigation in accordance with the internal procedure established for that purpose and shall guarantee the confidentiality and confidentiality of the information brought to the attention of the alleged victim and, for their part, shall guarantee due process to the accused. Once the corresponding investigation has been carried out, the measures and decisions to be adopted in the particular case will be decided.





In order for the complaint to be objectively and efficiently addressed by the analysis team, the facts must be listed, describing what happened, how, when, where and by whom(s), attaching the supports if available.

Once the complaint has been filed, the information may be expanded and the processing of the same may be followed up by the corresponding Labor Relations or Human Talent area.

Interviews, visits and other actions will also be carried out to verify the occurrence of the facts denounced, generating the corresponding reports as a history of the case.

After the evaluation work is completed, the conclusions will be generated and shared with the alleged victim.

8. EXTERNAL BODIES TO WHICH ALLEGED SEXUAL HARASSMENT BEHAVIOUR MAY BE REPORTED

Since it is considered a crime, the investigation, prosecution and punishment of acts that constitute sexual harassment in any of its forms will be the responsibility of the Office of the Attorney General of the Nation and the Judges of the Republic in accordance with Law 906 of 2004.

To report sexual harassment behavior, the person who considers himself or herself a victim of these can go directly to the Attorney General's Office or to the designated attention centers for support and guidance.

In addition to the above, in cases where the alleged harasser is the hierarchical superior, the complaint must be filed in parallel with the Ministry of Labor, which will be responsible for carrying out the respective follow-up, in accordance with the provisions of paragraph 3 of article 11 of Law 2365 of 2024.

9. NONCOMPLIANCE

Any person, regardless of the nature of the contractual relationship with Banco de Occidente, agrees to abide by the provisions contained in this policy and not to engage in conduct that may be considered to constitute sexual harassment in the workplace.

Any type of violation of this policy is constituted as a serious misconduct in the case of Banco de Occidente's direct employees, which may lead to the termination of the employment contract with just cause under the terms of paragraph 6) of paragraph a) of Article 62 of the C.S.T., a rule substituted by Article 7 of Decree Law 2351 of 1965 and in accordance with Articles 58 and 60 of the C.S.T.

Within the framework of an internal disciplinary process, the following conducts will be considered as aggravating circumstances:

- to. The abuse of a position of hierarchical superiority.
- b. The reiteration of offensive behaviors either to the complainant or another.
- c. The use of mechanisms with the aim of achieving impunity or non-reporting of the alleged conduct of sexual harassment.



10. VALIDITY

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- **Collaborator:** Term that refers to Banco de Occidente worker(s).
- **Lewd Gaze:** Gaze that has a strong tendency to sexual desire.