



PREVENTION POLICY

WORKPLACE HARASSMENT

1. INTRODUCTION

Banco de Occidente and all its employees are committed to preventing and mitigating workplace harassment in all its forms; therefore, we reject any type of harassment in the workplace. In accordance with the above, we reiterate our commitment to zero tolerance for such behavior, requiring our employees to respect the rights and dignity of all individuals, without distinction.

2. OBJECTIVE

Prevent behaviors that may constitute workplace harassment and establish general guidelines for action in situations where this type of situation occurs, in compliance with current regulations.

Establish prevention mechanisms aimed at generating a collective awareness of coexistence that promotes work under decent and fair conditions, harmony among those who share work life, a positive environment at the Bank, and the protection of people's privacy, honor, mental health, and freedom at work.

Ensure compliance with the workplace harassment prevention procedure established in the Internal Work Regulations, promptly processing complaints related to alleged workplace harassment through the Workplace Coexistence Committee.

3. SCOPE

This policy applies to all Bank employees, whether direct or in training, including interns, without discrimination based on gender, age, religion, ethnicity, sexual orientation, gender identity, position, seniority, or any other personal or employment status.





The Bank will keep complaints and investigations confidential, and information will be disclosed only on a need-to-know basis.

4. LEGAL FRAMEWORK

- Political Constitution of Colombia.
- Law 1010 of 2006.
- Resolutions No. 652 and 1356 of 2012.
- Resolution 2646 of 2008.
- Other concordant norms that modify, replace or substitute the previously mentioned

5. GENERAL GUIDELINES

Given the importance of establishing mechanisms to prevent alleged conduct constituting workplace harassment, the Bank has an Occupational Health and Safety Management System, which seeks to promote the physical, mental, and social well-being of its employees, reaffirming its commitment to ensuring decent and fair working conditions, harmony among those who share their work life, and a suitable work environment.

To achieve this, it is important to maintain good working relationships, based on respect for others, social support, and good treatment.

For this reason, and in order to prevent any form of workplace harassment described in Colombian regulations, Banco de Occidente defines the following actions:

- Activation of the Workplace Coexistence Committee when any alleged workplace harassment occurs.
- Comply with the work plan of the Workplace Coexistence Committee.
- Share with all employees the mechanisms and procedures defined by the Coexistence Committee for filing complaints of alleged workplace harassment.
- Continue providing support and training on topics related to conflict management, assertive communication, interpersonal relationships, and behaviors that promote healthy coexistence in the performance of duties.
- Continue managing psychosocial risk factors that may affect the social relationships at work.
- Carry out, where appropriate, the procedure contemplated in the Internal Work Regulations and Law 1010 of 2006.



6. COEXISTENCE COMMITTEE

The purpose of the Workplace Coexistence Committee is to review and evaluate complaints or potential situations of workplace harassment that may arise, as well as to recommend appropriate corrective measures to the Bank to address such conduct and monitor compliance with established preventive measures, in order to promote decent and fair working conditions, harmony, and a positive working environment for all employees.

a. Term of the Coexistence Committee: The term of the members of the Coexistence Committee will be 2 years, from its formation, which will be counted from the date of the communication of the election and/or designation of its members. The Bank will promptly advance the procedures for electing new committee members to ensure the committee's continuity and composition at all times. This is without prejudice to the newly elected members beginning their activities once the current committee's term has ended.

b. Functions of the Coexistence Committee: In order to fulfill its objectives, the Workplace Coexistence Committee will have the following functions:

- Receive and process complaints that describe situations that may constitute workplace harassment.
- Confidentially examine the cases raised in the complaints.
- Listen to the parties involved individually.
- Advance meetings in order to create a space for dialogue between the parties involved.
- Formulate an improvement plan agreed upon by the parties, ensuring in all the cases the principle of confidentiality.
- Follow up on the commitments made by the parties involved in the complaint, verifying its compliance in accordance with the agreement.
- In cases where an agreement is not reached between the parties, the recommendations made are not followed, or the conduct persists, the Workplace Coexistence Committee must refer the complaint to the labor inspector or file a complaint with the labor judge
- Submit recommendations for the effective implementation of preventive and corrective measures against workplace harassment, as well as the annual report on the results of the Workplace Coexistence Committee's management and the reports required by oversight bodies.
- Monitor compliance with the recommendations given by the Committee of Coexistence.
- Prepare quarterly reports on the Committee's management, including complaint statistics, case follow-up, and recommendations.

c. Meetings The Workplace Coexistence Committee will meet ordinarily once (1) every three months, will meet with half plus one of its members and



exceptionally when cases arise that require its immediate intervention and may be convened by any of its members.

Decisions will be made by simple majority, and the Committee meetings' decisions must be recorded in writing through minutes signed by the participants.

When Committee members consider they should meet on dates other than the regular ones, or when cases arise that require their immediate intervention, extraordinary sessions will be held, which may be called by any of its members.

All employees will avoid and report any type of discrimination, violence, conduct that could be considered harassment or coercion, and in general any form of workplace bullying.

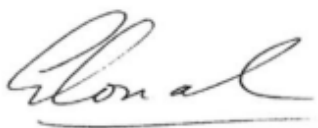
7. NON-COMPLIANCE

All employees agree to abide by the provisions contained in this policy and to refrain from engaging in conduct that could be considered workplace harassment.

Filing a complaint in good faith will not be used against an employee under any circumstances, nor will it adversely impact their employment status. However, if a Bank employee files unfounded or malicious complaints, this constitutes an abuse of this policy. Such a situation will be treated as a serious offense and will result in appropriate disciplinary measures, pursuant to section 6 of paragraph a) of Article 62 of the CST, a provision replaced **by Article 7 of Decree 2351 of 1965.**

8. VALIDITY AND MODIFICATIONS

This policy is mandatory and applies to all direct employees of Banco de Occidente SA. It will be effective starting November 1, 2024.



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