



GENERAL GUIDELINES ON CORRUPTION RISK MANAGEMENT FOR THIRD-PARTIES AND INTERMEDIARIES (TPIs)

1. DEFINITION OF TPIs

Third Parties and Intermediaries (TPIs) refer to any third party (individuals or legal entities) directly or indirectly used by Banco de Occidente and/or its subsidiaries to conduct business activities on a particular or regular basis with the purpose of either selling products or services of Banco de Occidente and/or its subsidiaries or purchasing goods and/or services for Banco de Occidente and/or its subsidiaries. Intermediaries can be defined as independent companies or individuals acting on behalf of Banco de Occidente upon which Banco de Occidente has a decisive influence. These partners frequently conduct day-to-day business activities, such as obtaining licenses, permits or authorizations, to engage in business development. Intermediaries (e.g., business development consultants, sales representatives, customs brokers, lawyers, accountants) are typically local allies who have a strong knowledge of local business culture and practices with an extensive personal network.

2. OBJECTIVES

2.1. GENERAL OBJECTIVE

Share the General Guidelines on Corruption Risk Management with the Third Parties and Intermediaries (hereinafter TPIs) of Banco de Occidente.

2.2. SPECIFIC OBJECTIVES

Promote an ethical culture in the relationship with third parties through specific guidelines aimed at mitigating corruption risks that may be involved in the selection, contracting and development of any contracted activities under a "Zero Tolerance" policy.

Provide guidelines to timely prevent, detect, investigate and remedy practices that, if not properly addressed, could lead to the materialization of corruption events in the relationship between Banco de Occidente and its TPIs.

3. SCOPE

TPIs of Banco de Occidente.

4. REGULATORY FRAMEWORK

As a normative reference framework, Banco de Occidente provides the following national and international laws into its guidelines:

- Law 1778 of 2016,
- International Standard ISO 37001 for anti-bribery management systems,
- Colombian Criminal Code and Anti-Corruption Statute (Law 1474 of 2011),
- Foreign Corrupt Practices Act of 1977 (FCPA),
- Sarbanes-Oxley (SOX) Act.



5. GUIDELINES

5.1. FACILITATION PAYMENTS

Banco de Occidente does not accept to give or receive any payments, bonuses, fees, commissions, down payments, per diems, debit cards or any other document that can be converted into cash with the objective of expediting processes and procedures before a third party or in favor of a third party, which is commonly known as “Facilitation Payments.”

The general guidelines on special business activities are detailed below:

5.2. GIFTS AND INVITATIONS (made by a Banco de Occidente officer to a TPI)

Giving gifts and invitations to a TPI by a Banco de Occidente officer shall be governed by the following guidelines:

The following may be offered:

- Promotional items such as umbrellas, caps, pens, calendars, diaries, etc.
- Items on special dates such as Christmas, Valentine’s Day, Secretary’s Day, Children’s Day, Women’s Day, among others, provided that they do not exceed 0.5 current legal monthly minimum wages cumulative per year given to the same beneficiary within the same calendar year.
- Invitations to events related to the ordinary course of business such as breakfasts, lunches, dinners, cocktail parties, workshops, seminars, trips and general activities for demonstration of services or products, as follows:
 - a. Seminars, courses and other academic or training events, provided that such events do not exceed either two (2) days or two (2) current legal monthly minimum wages per beneficiary.
 - b. Invitations to breakfasts, lunches and dinners, provided that they do not exceed two (2) current legal monthly minimum wages cumulative for the current year to the same beneficiary and that they do not exceed four (4) events in the same year.
 - c. Invitations and tickets to entertainment events provided that they do not exceed two (2) current legal monthly minimum wages cumulative for the current year given to the same beneficiary and that they do not exceed four (4) events in the same year.
 - d. Events of inauguration of works carried out by Grupo Aval or any of its subordinate entities in the development of the company’s purpose (e.g., roads, hotels, civil works, new bank branches, etc.)

5.3. GIFTS AND INVITATIONS (made by a TPI to a Banco de Occidente officer)

Accepting gifts and invitations from a TPI to a Banco de Occidente officer shall be governed by the following guidelines:

- Under no circumstances may gifts or invitations involve money or any other cash equivalent such as bonuses, checks, debit or credit cards, stocks and/or securities.

- The gift or invitation cannot exceed two (2) current legal monthly minimum wages and cannot be received more than once in the same quarter by the same third party.
- Under no circumstances may the receipt of a gift or invitation have the ability to influence the Officer's behavior and decision-making unduly or illegally.
- They must not be granted during or within three (3) months following a negotiation.

Note: For the acceptance of gifts and invitations, the same conditions of Section 5.2, paragraphs a to d shall apply mutatis mutandis.

5.4. OTHER SPECIAL BUSINESS ACTIVITIES

In the event that a TPI decides to conduct activities such as sponsorships, donations, public and/or political contributions on behalf of Banco de Occidente, the TPI shall comply with the specific guidelines established for each of these special activities.

6. CONFLICTS OF INTEREST

In order to ensure that all operations between Banco de Occidente and its TPIs are conducted with the strictest standards of Transparency, Banco de Occidente has established a policy on the resolution of conflicts of interest, whereby each TPI that is aware of a situation that may create (or is creating) a conflict of interest is required to report the conflict of interest through the channels established for this purpose, including all information deemed relevant for the determination of the existence of such conflict.

A conflict of interest is understood as a situation whereby someone (individuals or legal entities) is faced with different behavior alternatives that given their particular interests may prevail over their legal or contractual obligations (work or economic activities.)

Regarding this, the channels available for reporting any conflict of interest are below:

- Supplier Registration Form: During the registration process, all TPIs of Banco de Occidente may disclose the conflicts of interest which the TPI considers appropriate by using the fields established for this purpose.
- Regular Supplier Update: Every year, TPIs are required to provide their updated data at the request of Banco de Occidente.
- Ethics Hotline: Banco de Occidente has made the ETHICS HOTLINE available as a whistleblower channel to TPIs and other stakeholders to report any possible conflicts of interest or their materialization.

7. AUDIT AND ANTI-BRIBERY CLAUSES

Banco de Occidente reserves the right to include audit clauses in contracts (or document in lieu thereof) that allow the inspection of compliance with these guidelines, as well as the right to include the anti-bribery clause in which the parties declare to know and expressly accept the strict compliance with local and international anti-corruption laws.

Failure to comply with these obligations shall constitute grounds for immediate termination of the contract without leading to noncompliance nor compensation whatsoever.



8. BANCO DE OCCIDENTE ETHICS HOTLINE

Banco de Occidente has made the BANCO DE OCCIDENTE ETHICS HOTLINE available to all TPIs and other stakeholders to encourage the reporting of possible noncompliance with the guidelines outlined in this document or any other behavior that is contrary to the corporate ethical standards.

The BANCO DE OCCIDENTE ETHICS HOTLINE has been established following strict security parameters to ensure the confidentiality of the information provided and protect the identity of those who provide information.

The Ethics Hotline is available at:

- Banco de Occidente Ethics Hotline
<https://www.bancodeoccidente.com.co/wps/portal/banco-de-occidente/bancodeoccidente/footer/otros/linea-etica>
- Grupo Aval Ethics Hotline
<https://www.grupoaval.com/wps/portal/grupo-aval/aval/acerca-nosotros/linea-etica>

9. SUPPLEMENTARY CERTIFICATES

Banco de Occidente may request a certificate of knowledge and compliance with the general guidelines of this document from TPIs whenever deemed necessary.