



Ethics and conduct guidelines for the group suppliers

Introduction

Our organizational culture and ethical standards have always been the foundation of the relationships with our stakeholders, guiding our decision-making processes and supporting the creation, development, promotion, and performance of businesses in all regions where we operate.

To Bancolombia Group, our suppliers are the main pillars of our present and future operations. They leverage our business through everyday actions aligned to our behaviors, promoting a sustainable operation, and ensuring a solid long-term reputation.

To achieve the above, we have defined these guidelines in ethics and good conduct for suppliers, which must be known and accepted by our business partners as a complement to the applicable rules and clauses defined in each of the contracts we entered.

Scope and Compliance

These guidelines apply to Bancolombia Group suppliers, whether natural or legal persons, who supply goods and services, and to their collaborators and contractors who provide goods or services for the Group.

Suppliers must be able to demonstrate compliance with these guidelines. Bancolombia Group may carry out verification actions directly or through third parties and in the event of non-compliance, agree on improvement actions and impose sanctions.

1. Integrity in its actions

- Acting always within the principles of ethics, integrity, honesty, transparency, and respect of the rules.
- The end does not justify the means; in our decision-making processes, respect for the law, ethical behavior, and integrity must prevail over commercial results.

2. Respect for human rights

- Being committed to respect and promotion of Human Rights, is a basic prerogative to seek and ensure the dignity, equality, and development among individuals.
- Rejecting any form of illegal or abusive employment and any other violation of human rights, such as discriminatory acts, workplace and sexual harassment, disrespect, and physical or psychological mistreatment or abuse.

- Fostering relationships based on respect for human dignity, and strictly comply with applicable labor laws related to hiring processes and collaborators safety, health, and well-being at work.

3. Zero tolerance for fraud, corruption, money laundering and terrorist financing

- Not accepting acts of fraud, corruption, money laundering, and terrorist financing and, preventing the supplier's operations from being used directly or indirectly to carry out illegal activities or giving to them the appearance of legality.
- Creating appropriate and well-balanced mechanisms to prevent, identify and manage the risks related to fraud, corruption, money laundering, and terrorist financing, considering the nature and size of their companies.
- Reporting to the Bancolombia Group through the Ethics Line of each country, any suspicions they may have regarding fraud, corruption, money laundering, and terrorist financing involving the operations or activities of the Group.
- Complying with fiscal and tax duties in accordance with applicable regulations.

4. Sustainability

- Complying with the environmental standards established in the country of operation and being committed to the environmental care.

5. Healthy and free competition

- To respect healthy and free competition without engaging in anti-competitive practices, such as agreements that limit or restrict free competition, abuse of the dominant position, and acts that restrict competitors.

6. Identification and management of potential conflicts of interest

We are aware that conflicts of interest are inherent to human nature, and we recognize that their existence is not in itself reprehensible. However, at the Bancolombia Group, we understand that acting in a conflict-of-interest situation without being disclosed and properly managed can lead to inappropriate behavior. Hence, we demand from our suppliers:

- To act with the utmost prudence and identify and notify the Bancolombia Group when you face a real or apparent conflict of interest while providing your services or

delivering products to the Group.

- To have processes for managing conflicts of interest and disclose to the Group entity for which the service or product is delivered the potential conflicts of interest that directly involve it or its collaborators or shareholders, to be reviewed and managed. The disclosure to the Bancolombia Group must be made through the supply chain department, from the preliminary stage to the contracting phase, and immediately, if they arise during the management as a supplier.

7. Granting of gifts and invitations to group collaborators

At the Bancolombia Group, we understand that receiving gifts and invitations as a courtesy or symbolic show of gratitude is a common practice in the business world.

However, when gifts or invitations are recurring or excessive or are made to influence decision-making improperly, this practice can generate an apparent or actual conflict of interest, becoming inappropriate, and in some instances, illegal. Our suppliers must:

- Refrain from giving gifts or invitations directly or through an intermediary person to the collaborators of the Bancolombia Group that affect or appear to affect their objectivity, impartiality, and independence.
- If a supplier decides to give a gift to one of Bancolombia Group collaborators, he must consider the following:
 - Under no circumstances should they give presents to the Bancolombia Group collaborators in cash.
 - Gifts must not exceed the equivalent of two hundred US dollars (US\$ 200), individually or accumulated in the calendar year.
 - In the case of invitations to events of an academic nature, knowledge transfer, or that generate technical value, they should address it to the entity and not to a specific team member. The entity will evaluate it to determine its viability and define the team member who must attend.

8. Confidentiality and protection of information

- Our suppliers must understand that the information of the Group companies regarding their activities, their clients, their shareholders, and other third parties to which they have access due to the service they provide is confidential and reserved.

- Using information following what is strictly stipulated in the contract entered into with Bancolombia Group, always respecting the information holders and strictly complying with the confidentiality agreements contractually agreed upon, as well as the personal data and information protection regulations.

9. Ethic Line

- To allow its collaborators to make complaints to the Group, through the channel provided for that purpose (the “Ethics Line”), any breach of these guidelines or any incorrect act related to the provision of the service or product delivery, without resulting in retaliation.
- To inform about the complaints channel among its collaborators and subcontractors assigned to the Group’s service, using the materials that the Group makes available to them.

I attest and verify that my company and collaborators who work in it will act under the ethics and conduct guidelines presented by Bancolombia Group in this document during the provision of services or the delivery of products.

Signature of Legal Entity

Legal Representative Signature

Tax ID number: NIT

Company:

Signature of a natural person

Signature

Name:

Number of personal identification:



Ethics Line

Colombia:

- National Colombia: 018000 524499 Celphone: # 955
- Medellín: 448 4868
- FAX Colombia: (4)4531953
- App Bancolombia: Contact us / Ethics line

El Salvador:

- 503-2259-7898

Guatemala:

- 502-2378-6933
- etica@bam.com.gt

Panamá:

- National Panama: 01 100 800 157 00 76
- Panama City: (507) 306 55 74

Puerto Rico:

- 1866 6876201



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