



# DIVERSITY AND INCLUSION POLICY



Corficolombiana

Trabajamos e invertimos  
en el progreso del país

## DIVERSITY AND INCLUSION POLICY

### 1. OBJECTIVE

At Corficolombiana we understand that the world is diverse and changing. Thus, we recognize the importance of promoting inclusion and diversity in society as strategic elements that add value to the organizational culture, foster innovation, well-being and productivity.

We believe that a diverse and inclusive culture allows us to contribute to a changing society that requires opportunities for all, regardless of race, ethnicity, gender, age, religion, disability and sexual orientation, nationality, education, personality, skills, experience and knowledge base. We promote collaborative environments with equal opportunities for all.

The purpose of the Diversity and Inclusion Policy is to establish general guidelines to ensure that our culture reflects the above principles. This policy is aligned with Grupo AVAL's Corporate Diversity and Inclusion Policy, which establishes the general principles and guidelines that complement our code of ethics and ensure a diverse, equitable, inclusive and respectful organizational culture that values differences.

### 2. SCOPE

The Diversity and Inclusion Policy is directed to Corficolombiana, its affiliates and subsidiaries.

### 3. DEFINITIONS

**Diversity:** Refers to the multiple ways of being, of inhabiting the world and to the identity, social, cultural, ethnic, religious and other particularities that define each person and provide added value to society.

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

**Reasonable Adjustments:** Those provisions adopted with the purpose of adapting the environment, goods, products and services to the specific personal situations that, for different reasons, are in a special situation, when the measures stipulated by law cannot be carried out or that entail a disproportionate burden for the person carrying them out.

**Inclusive Language:** Refers to the use of language in a way that recognizes and integrates the various population groups, avoiding marginalization and bias.

**Accessibility:** Condition that spaces, environments, products and services must meet, so that they can be used by all people, facilitating their interaction in a simple and comfortable way.

**Physical Barriers:** All those physical restraints and obstacles that limit or impede people's freedom of movement or normal displacement.

**Gender:** Category that organizes and hierarchizes social practices, assigning roles in different areas. It serves as a mechanism that marks the differences between people, based on sex as a factor that leads to practices regarding what is and ought to be between men and women, mainly.

**Gender Equity:** Seeks to provide the same conditions to human beings, without any discrimination based on their gender, recognizing their trajectories, experiences and contributions.

**Sexual Orientation:** It is the desire and affective or sexual attraction felt for another person, whether of the same sex or another.

**Ethnicity:** Concept used for the identification of people as members of one of the legally recognized ethnic groups, ethnicity accounts for the cultural and socio-organizational differences of some groups; ethnicity includes the different cultural manifestations of a population with reference to their religious, political, organizational, spiritual practices, as well as their worldviews and language.

**Inclusion:** Actions aimed at improving and facilitating the conditions of access to services and the effective enjoyment of rights through free expression of those who have been historically excluded. It is expressed through the promotion of positive changes, both at the collective and individual level.

#### 4. PRINCIPLES

In compliance with our business principles, our Code of Ethics and our Human Rights Policy, we guarantee equal opportunities and non-discriminatory, fair and impartial treatment of people in all areas of our Organization, without prejudice associated with race, nationality, ethnic origin, religion, gender, sexual orientation, marital status, age, disability or family responsibility.

Based on the above, we guarantee the following actions:

➤ **Equal treatment, respect for human rights and dignity for people in their diversity**

Our processes and policies promote equal treatment of all people, regardless of ethnicity, gender identity, sexual orientation, political or religious affiliation, nationality, disability, age, marital status, socioeconomic status, among others. In addition, they encourage dignity and the promotion of an open and respectful environment for all people, avoiding any type of discrimination and/or harassment, seeking an inclusive work environment that involves valuing diversity.

➤ **Environments free of discrimination and equal opportunities**

We are committed to promoting inclusive practices, spaces and services. In the decisions associated with the labor relationship and access to opportunities, the criteria of merit, competencies and professional capabilities will always prevail, without any discrimination.

➤ **Accessibility and progressive reduction of physical, attitudinal and communication barriers**

We promote a diverse talent and safe environments; therefore, we provide spaces and mechanisms that allow the progressive reduction of physical barriers and the implementation of cultural transformation initiatives, encouraging the use of inclusive language in corporate, internal or external communication.

➤ **Balance between work, personal and family life of collaborators**

We recognize the importance of balancing the needs of the team, promoting flexible, equitable measures and solutions that allow the reconciliation of work, personal and family life.

➤ **Inclusive access**

We respect and value diversity of the people to whom we provide our services, that is why we promote equality in the treatment offered by our collaborators, so that all interested people can request and access products, services, advice or information, and always receive a respectful, equal treatment and with all the guarantees of transparency by the team that is part of our organization.

## **5. RESPONSIBLE PARTIES OF THE POLICY**

The Board of Directors is responsible for the approval of the Diversity and Inclusion Policy, as well as its subsequent modifications.

The directors and all collaborators of Corficolombiana must respect, promote and act in coherence with the Corporate Diversity and Inclusion Policy.

The Corporate Human Resources Management or whoever acts on its behalf, must methodologically accompany the leaders of the processes, to adequately apply the Diversity and Inclusion Policy and adapt it to the particularities of the operation.

## 6. REPORTING OF EVENTS OF NON-COMPLIANCE WITH THE DIVERSITY AND INCLUSION POLICY

Corficolombiana, its affiliates and subsidiaries will establish mechanisms to report a complaint or an event related to possible non-compliance with the Policy. Any member of the corporation, customer, supplier or third party may register a complaint or an event related to a fact contrary to the Diversity and Inclusion Policy.

The mechanisms defined may be the company's ethics helpline, an email address, and/or any other means that allows a complaint or report of a non-compliance with the Diversity and Inclusion Policy to be made. Through the mechanisms provided, any collaborator may make a report anonymously and confidentially.

In Corficolombiana the mechanism defined to report complaints or events related to non-compliance with the Diversity and Inclusion Policy is the ethics helpline, which can be accessed through the email [denuncias.controlinterno@corficolombiana.com](mailto:denuncias.controlinterno@corficolombiana.com) and/or the Corficolombiana website [www.corficolombiana.com](http://www.corficolombiana.com) through the complaints icon.

The complaint or report of events related to non-compliance with the Diversity and Inclusion Policy should include, as much as possible, at least the following:

- Brief account of the facts
- Evidence to support the complaint or event (e.g., emails, documents, testimonies, etc.).

The identity of the complainant, if established, along with the information and evidence provided in the report will be kept confidential.

## 7. HANDLING OF EVENTS

Once an event or complaint related to non-compliance with the Diversity and Inclusion Policy has been reported through the established mechanisms, the protocol defined to analyze the event or complaint will be activated and, according to its result, it will be determined which body will provide a timely

solution, through the definition of actions to remedy or mitigate the potential impacts derived from the non-compliance.

The results of the investigation may not be disclosed to anyone who does not have a legitimate need to know them.

## **8. INFORMATION AND COMMUNICATION**

### **8.1. Information Repository**

Corficolombiana, its affiliates and subsidiaries must have an information repository to support the elements of the Diversity and Inclusion Policy, as well as tools to manage it.

### **8.2. Communication Plan**

Aware that effective communication is a fundamental element for the implementation, internalization, maintenance and sustainability of the Diversity and Inclusion Policy, a communications plan must be developed, which will be led by the Public Relations, Communications and Marketing Department, supported by the Corporate Human Resources Management or whoever acts on its behalf. The communications plan may include internal campaigns, support material, written communications, emails, etc., where the most relevant aspects of the concepts of diversity and inclusion are strengthened and promoted.

## **9. SANCTIONS**

Corficolombiana, its affiliates and subsidiaries acknowledge that in the event of non-compliance with this Policy and other activities derived from it, the entities and persons responsible for its application and compliance will be subject to administrative, criminal and pecuniary sanctions, as established in local and international laws.

Non-compliance with the provisions of this Policy by any collaborator constitutes misconduct that will be investigated and sanctioned in accordance with the provisions of the Internal Work Regulations and the law.

The foregoing is without prejudice to criminal, administrative, civil or any other type of action to which the non-compliance may give rise, as set forth in the legal regulations that make up the legal framework of this policy.

## 10. REFERENCE DOCUMENTS AND ANNEXES

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DIVERSITY AND INCLUSION POLICY OF GRUPO AVAL

CODE OF ETHICS AND CONDUCT - CFCPOOC01

INTERNAL WORK REGULATIONS - CFCPORH03

CODE OF GOOD GOVERNANCE - CFCPOSG01

OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM MANUAL - USCMUGH02

ML/TF RISK MANAGEMENT SYSTEM PROCEDURE - CFCPROC10

HUMAN RIGHTS DECLARATION - CFCPOPR06

HUMAN RIGHTS POLICY - CODE: CFCPOPR05

SUPERINTENDENCIA FINANCIERA  
DE COLOMBIA

VIGILADO

[www.corficolombiana.com](http://www.corficolombiana.com)  
[www.investigaciones.corficolombiana.com](http://www.investigaciones.corficolombiana.com)

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