



HUMAN RIGHTS CORPORATE POLICY



Corficolombiana

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en el progreso del país

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HUMAN RIGHTS CORPORATE POLICY

1. OBJETIVE

Formalize the commitment to promoting and respecting human rights (HR) in Corficolombiana affiliates and subsidiaries, together with the definition of human rights risk management guidelines.

2. SCOPE

The Human Rights Corporate Policy is addressed to the Corporation, affiliates and subsidiaries, as well as any other strategic ally with which we have a relationship in the development of our activities such as: customers, foundations, suppliers with contract modality, which are under the supervision of the Corporation, among others.

3. DEFINITIONS

3.1. Human Rights

These are rights inherent to all human beings without distinction of nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other condition. We all have the same human rights, without discrimination of any kind. These rights are interrelated, interdependent and indivisible.

3.2. Due Diligence

In the context of the Guiding Principles, human rights due diligence is an ongoing management process that a wise and reasonable company should undertake, in light of its circumstances (such as the industry in which it operates, the context in which it does business, its size and other factors), to address its responsibility to respect human rights.

3.3. Mitigation

Mitigation of human rights risk refers to measures taken to reduce the likelihood of the occurrence of a given negative impact.

3.4. The most relevant Human Rights

The most prominent human rights are those that are most relevant because they are most at risk.

3.5. Risks related to Human Rights

A company's human rights risks are understood to be the risks that its activities may result in one or more adverse human rights impacts.

4. GENERAL GUIDELINES

This statement is in line with our corporate values, where we recognize and respect the human rights of the people with whom we interact.

We will take as a reference framework the Universal Declaration of Human Rights of the United Nations, the Declaration of Fundamental Principles and Rights at Work of the ILO, those international treaties that are accepted by the Colombian government and regulations of the places where we are present.

5. DECLARATION OF HUMAN RIGHTS

This declaration supports our vision of being an admired and respected company that works and invests in the progress of the country.

We recognize the human being as central focus of everything we do. We are committed to promoting human rights. Rights are inherent to all people, who must be treated equally.

Our commitment is reflected in:

- We encourage respect for and promotion of human rights as a criterion for management and decision-making.
- We reject any act that violates or infringes on human rights. These include, but are not limited to, forced labor, workplace harassment and human trafficking.
- We have absolute respect for the personal dignity of our employees and their beliefs.
- We respect and do not discriminate against people, colleagues, clients, contractors or providers due to differences of sex, religion, political affiliation, nationality, social level or hierarchy.
- We provide decent, safe and healthy working conditions.
- We recognize our employees' right to rest.

- We reject child labor.
- We comply with current labor legislation.
- We offer equitable remuneration in accordance with the law.
- We respect the right of free association and collective bargaining.
- We value the culture and diversity of the territories where we operate.
- We act with transparency in decision making, in the handling of information and before the community in general.

In the same way we have a commitment to Human Rights, before our suppliers, contractors and other strategic allies. In this way we are committed to:

- Disseminating our Human Rights Policy among our suppliers, contractors and allies.
- Promoting and encouraging them to formalize their commitment to Human Rights.
- Including clauses of respect for Human Rights, in the contracts established with suppliers, contractors or other strategic ally determined by the Corporation.

We are aware that our actions can affect the communities where we invest, as well as our customers. Therefore, we are committed to:

- Publicly supporting respect for Human Rights
- Developing our activities in a way that minimizes social and environmental impacts in the communities where we work.
- Through our Foundation, or in alliances with other entities, public or private, we will seek to develop initiatives that impact Human Rights in the communities where we invest.

6. RESPONSIBLE PARTIES FOR THE POLICY

The Board of Directors is responsible for the approval of the Corporate Human Rights Policy, as well as its subsequent modifications.

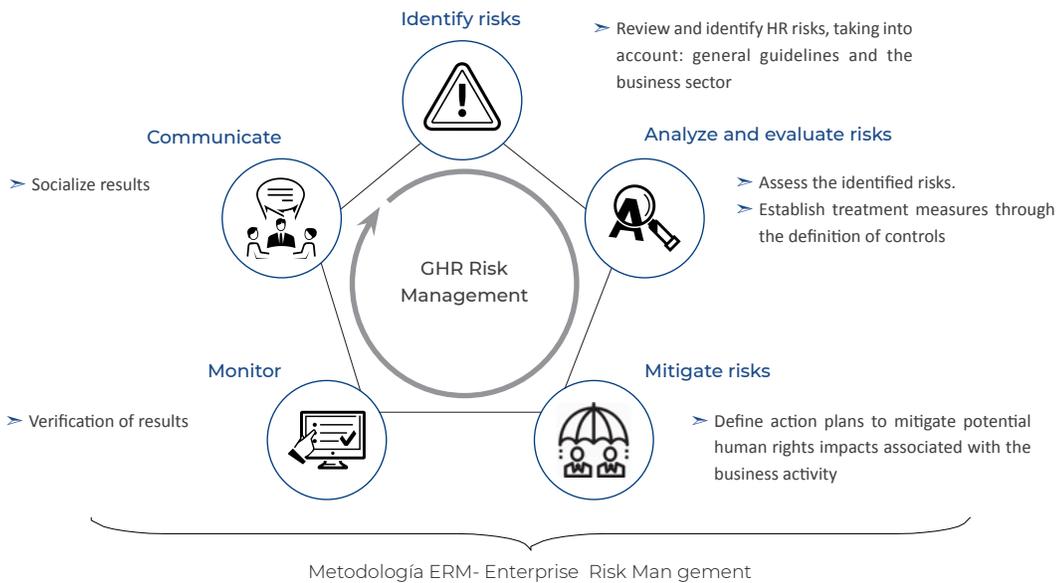
The directors and all Corficolombiana's collaborators must respect, promote and act in coherence with the Corporate Human Rights Policy.

The Vice-Presidency of Risk Governance and Compliance, or whoever takes its place, must methodologically accompany the leaders of the processes, who are responsible for the identification and assessment of human rights risks, together with the definition of controls and mitigation plans for potential impacts on human rights associated with the business activity.

The Risk and Compliance function, or whoever takes its place in the affiliates and subsidiaries, must take this policy as a reference and adapt it to the particularities of their business activity.

7. HUMAN RIGHTS RISKS

The risk methodology to identify, analyze, evaluate, mitigate, monitor and communicate the risks associated with human rights is explained in the following chart:



7.1. Reporting of Human Rights events

We are aware of the importance of reporting incidents related to the possible infringement of human rights; therefore, Corficolombiana, affiliates and subsidiaries, must establish mechanisms that allow reporting a complaint or an event of a possible violation of human rights. Any member of the Corporation, customer, supplier or third party can file a complaint or a human rights event.

The mechanism defined to report complaints or human rights events in Corficolombiana is the ethics hotline, which can be accessed through the e-mail denuncias.controlinterno@corficolombiana.com and/or the Corficolombiana web page www.corficolombiana.com through the complaints' icon. Any person in a personal or institutional capacity can make the report, anonymously and confidentially.

The complaint or the report of human rights events should, as far as possible, contain at least the following:

- Brief detail of the facts
- Evidence to support the complaint or event (e.g. e-mails, documents, testimonials, etc.)

The identity of the claimant, if established, along with the information and evidence provided in the report are kept confidential.

7.1.1. Treatment of events

Once a human rights event or complaint has been reported through the defined mechanisms, the defined protocol will be activated to analyze the event or complaint and, according to its result, it will be determined which instance will provide a timely solution by defining actions to remedy or mitigate the potential impacts of the human rights violation.

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 a repository of information to support the elements of the Human Rights Policy, as well as tools to manage the risks identified and the controls implemented (risk and control matrix).

8.2. Communication Plan

Aware that effective communication is a fundamental element for the implementation, internalization, maintenance and sustainability of the Human Rights Corporate Policy, for which a communications plan must be developed, which will be led by the Public Relations, Communications and Marketing Department of the Corporation, supported by the Vice-Presidency of Governance, Risk and Compliance or whoever

takes its place. The communications plan may include internal campaigns, support material, written communications, e-mails, etc., where the most relevant aspects of human rights 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 shall be subject to administrative, criminal and pecuniary sanctions established in local and international laws.

9.1. Disciplinary Sanctions

Non-compliance with the provisions of this Policy by any employee constitutes a 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 any 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

Reference Documents

CODE OF ETHICS AND CONDUCT - CFCPOOC01

INTERNAL LABOR REGULATIONS - CFCPORH03

CODE OF GOOD GOVERNANCE - CFCPOSG01

MANUAL OF THE OCCUPATIONAL SAFETY AND HEALTH MANAGEMENT SYSTEM - USCMUGH02

PROCEDURE OF THE ML/FT RISK MANAGEMENT SYSTEM - CFCPROC10

Annexes

HUMAN RIGHTS DECLARATION - CFCPOPR06

11. CHANGES AFTER THE POLICY CREATION

Datea	Version	Change Nature
Feb-24/2020	1	Creation of document.
Jun-08/2022	2	Updating the scope and commitments of the declaration of Human Rights.

Update date: Jun-08/2022

SUPERINTENDENCIA FINANCIERA
DE COLOMBIA

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