Findeter

Banca de Desarrollo Territorial

CORPORATE GOVERNANCE CODE

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I - Presentation of the Corporate Governance Code

A. Purpose

FINDETER'S Corporate Governance Code provides the set of values, policies, mechanisms and instruments, processes and best practices within which the Entity's corporate governance actions are framed and regulated and based on which it manages risks under a control system that ensures transparency, efficiency and accountability and, in particular, that seek to build trust in FINDETER'S sustainable management among stakeholders, market and citizens.

B. Principles

The principles of Corporate Governance are:

- Transparency
- Trust
- Accountability
- Sustainability

C. Recipients

The recipients of Findeter's Corporate Governance Code are its stakeholders, namely: Management and Governing Bodies, the Government, Supervisory Agencies, Funding Partners, Customers, Community, Collaborators, Contractors, Suppliers of Goods and Services, Opinion Leaders/Media.

II - FINDETER Presentation

A. Nature and Position

Financiera de Desarrollo Territorial S.A. – FINDETER is a national public-private partnership different from an industrial and business State-owned enterprise, organized as a joint-stock credit institution under private law, attached to the Ministry of Finance and Public Credit and supervised by the Financial Superintendence of Colombia. FINDETER is not in a subordination position, has no parent or controlling companies, or subsidiaries or subordinate companies. It is governed by Act 57 of 1989, Decree 4167 of 2011, and articles 268 et seq. of the Organic Statute of the Financial System, as amended.

B. Corporate Purpose

FINDETER'S corporate purpose is the promotion of regional and urban development, through financing and consulting on the design, execution and management of infrastructure and environment investment projects or programs. Likewise, the execution of those activities that are assigned to it by legal provision or those that the National Government attributes to it.

C. Operations and Sectors

Operations

In developing its corporate purpose, FINDETER is authorized to carry out the following operations:

a) On-loan credits to public entities, to private law entities and free-standing trusts, as long as said resources are used in the activities defined in numeral 2 of article 268 of the Organic Statute of the Financial System and in projects related to the environment.

b) Rediscount lease agreements under the terms and conditions set out by the National Government.

c) Raising internal savings by issuing securities and signing other documents, and enter into internal loan agreements.

d) Receive term deposits or readily available deposits from public entities.

e) Execute external loan operations.

f) Manage securities issues

g) Execute trust, guarantee, agency, or payment agreements, and enter into trust agreements to manage the resources transferred by other public entities.

h) Provide technical assistance, project structuring, and technical and financial consulting services.

i) Manage third party securities.

j) Issue guarantees.

k) Create lines of credit with compensated rate, including lines to promote microcredits, provided that the resources equivalent to the amount of the subsidy come from the Nation, public entities, territorial entities or private entities, upon authorization of the National Government and approval and regulation of the Board of Directors.

l) Acquire, negotiate or sell movable or immovable property to ensure the execution of the corporate purpose.

m) Transfer, accept to endorse or negotiate securities.

n) Pay off employment liabilities and the costs of executing employee retirement plans when they are part of programs for the restructuring or transformation of public utilities, leading to improvements in the efficiency of their provision.

o) Grant financing to its employees, derived from the ordinary execution of their employment relationship and the social welfare policy, subject to the general rules issued by the Board of Directors or as a result of collective agreements or conventions.

p) Execute any and all kind of agreements whose object is to develop the corporate purpose.

q) Authorize the decentralized entities of territorial entities to mediate on-loan operations.

r) Invest in Private Equity Funds whose investment policies are related to FINDETER'S corporate purpose.

s) Exceptionally grant direct credits with a compensated rate and/or syndicated credits with public international law entities aimed at financing investment projects in eligible sectors, which will be granted as a priority to category 4, 5 and 6 municipalities and departments of category 2, 3 and 4 and districts, and other direct credit operations authorized by current regulations.

Conditions of Credit Operations

FINDETER conducts all its credit operations using the on-loan system, through credit institutions or entities duly authorized by law.

Sectors

FINDETER carries out its activities in different sectors of the national economy, such as drinking water and basic sanitation, housing, transportation, healthcare, education, energy, sports, recreation and culture, tourism, telecommunications and fiscal restructuring, among others.

D. Strategic Management

The CEO and his Management Team keep the Entity's Strategic Management up to date, which supports the commitment to comply with the mission, vision, value proposition, ethical principles, values and the Corporate Strategic Plan.

Mission

We are the strategic partner of the National Government and Territorial Entities for the planning, structuring, financing and execution of sustainable projects that transform territories.

Vision

By 2026 we will be the Development Bank recognized for contributing to territorial strengthening and financial inclusion, through sustainable and innovative solutions.

Value Proposition

Improve the quality of life of the most needy Colombians.

Ethical principles

Our Ethical Principles are:

a) We act according to established institutional values.
b) We make FINDETER a solid, profitable and sustainable institution for the country's development.
c) We act with the philosophy of continuous improvement.
d) We make the general interest prevail over personal interests.
e) We work as a team promoting active participation.
f) We promote and encourage the improvement of the quality of life of workers.
g) We know and apply the legal provisions that govern the Company's activities.
h) We manage resources effectively.

Values

Our Values are:

a) **Integrity.** We always act based on honesty, fairness, truth, fulfilling our duties with transparency and righteousness, always favoring the general interest. We act impartially, guaranteeing people's rights, with equity, equality and without discrimination. We are consistent between what we think, feel and do.

b) **Respect**. We recognize, value and treat all people with dignity, without distinction as to race, gender, sexual orientation or political affinity, with their strengths and weaknesses alike, regardless of their work, origin, titles or any other condition.

c) **Commitment.** We are aware of the importance of our role as FINDETER workers and we are willing and diligent to understand and solve the needs of the people with whom we interact on a daily basis. We give our best and act responsibly in the use of FINDETER'S resources.

d) **Teamwork.** We join forces to achieve common objectives, fulfilling the assigned duties, roles and responsibilities with care, promptness and efficiency, to optimize the use of resources.

e) **Willingness to Serve**. We understand and meet the needs and expectations of our stakeholders.

f) **Innovation.** We are open to change and always look for new and better ways of doing things.

g) **Transparency:** We are responsible, honest, we assume the consequences of our actions, we do not lie in the development of our work. We act with authenticity and generate trust and security in the relationship with our stakeholders.

E. Human Rights in the Organization

As part of its Responsible Action/Sustainability policy, FINDETER is committed to guaranteeing, promoting and respecting Human Rights (HR) in all its activities and with all its stakeholders, contributing to the sustainable, fair and equitable development of Colombian society.

To achieve this, the following principles will be observed in their respective processes: 1. Guarantee, respect and promotion of human rights with all its stakeholders. 2. No discrimination based on race, sex, sexual orientation or political affinity. 3. Sustainable Environmental Management, not compromising the resources of future generations with our present activities. 4. Respect for communities, especially minority groups

F. Corporate Strategic Plan

In FINDETER, the Corporate Strategic Plan is the tool for organizing, planning and executing strategic activities, programs and projects under best practices in internal management and, in turn, allows addressing the development of inherent policies of the National Government, the behavior of eligible sectors, the market and the financial sector. Its annual execution is through projects of the Action Plan, which are monitored based on their initial planning. With the Strategic Plan, the Entity carries on with the established plans and creates alerts to address situations that may arise from the behavior of the environment, the competition, the market and regulations, among others.

The cornerstone of the Corporate Strategic Plan's implementation is the application of the policy and objectives of the Integrated Management System - IMS (Quality Management System, Internal Control Standard Model - MECI / Internal Control System - ICS) and the different Risk Management Systems of (RMS). These aspects will be directly involved in the Company's processes, integrated management and results.

G. Stakeholders

Stakeholders are all those groups that are directly or indirectly impacted by the development of our activity and, therefore, also have the capacity to impact us directly or indirectly.

Stakeholders	Commitment And Relationship Strategy
Supervisory Agencies They are the internal and external control entities that fulfill the functions of	- We ensure timely compliance with our legal obligations - We work to keep the authorities

surveillance, monitoring and control over the operations, obligations and activities of Findeter. Which are? Financial Superintendence, Attorney General's Office, Comptroller's Office, Accounting Office.	informed about our procedures and performance. - We maintain a fluid and cooperative relationship - We attend to each of the recommendations and instructions in a diligent and timely manner
Government Authority in charge of providing guidelines for Findeter's management and performance. Presidency of the Republic, Ministries.	- We support the management of the National Government and the implementation of public policie. - We attend to the established requirements and guidelines in an efficient and timely manner. - We work on the good performance of the procedures recommended by the sector - We contribute to the construction of an environment that promotes transparency - We guarantee coverage of social benefits
Funding Partners Creditors, investors, multilateral and bilateral banks, cooperation agencies, and any entity that contributes funds to Findeter. Investors are those who acquire loans, term deposits, or other credit instruments, placed by Findeter and those who acquire Findeter shares as of the issuance of Decree 4167 of 2011.	- We efficiently manage resources - We ensure equitable treatment for our investors - We implement risk management models - We work together to generate value for our territories
Strategic Partners They correspond to all those entities that work strategically and jointly with Findeter for the development of new products/services. Which are? Development banks, commercial banks, finance companies, unions, among others or those entities that promote standards or regulatory certifications that must be adopted by the entity (Marketing self-regulator, rating agencies)	- We offer fair, mutually beneficial relationships that allow us to achieve objectives - We work together to grow and make our allies grow - We build joint opportunities to establish projects - We identify and adapt the best practices in the environment - We work to generate greater positive impacts in the territory
Allies All those legal entities, public (national and territorial), financial intermediaries, private entities with which Findeter relates through operations through its business lines in	- We offer a portfolio of financial and non-financial products/services that respond to your needs - We guarantee the quality and timeliness in the provision of our

favor of the development of the country. Which are? PUBLIC ALLIES: Governments, Mayors, Administrative Departments, Decentralized Entities, Ministries, DNP, CAR, ESE, ESP, EPS PRIVATE ALLIES: Commercial banks, commercial financing companies,_financial entities, small, medium and large companies in financeable sectors.	products/services - We fulfill our promise of value We work to build relationships of trust in the long term
Community Beneficiaries, Community groups and organizations, social leaders located in the areas of influence of the projects.	- We seek to understand the needs of the territories through dialogue and collaboration. - We act with integrity, generating trust. - We respect and ensure their rights and the socio-economic context in which they find themselves. - We contribute to sustainable development and the transformation of territories
Contractors Natural or juridical persons that provide technical assistance services in Planning, Structuring, Execution. Trust Companies, Consultants.	- We establish relationships of trust and teamwork - We offer development spaces - capabilities for mutual benefit - We promote environmental, social and governance aspects - We work as a team to achieve projects
Suppliers of Goods and Services Natural or juridical persons hired by Findeter for the provision of a service or the purchase of a product	- We generate relationships of trust and efficiency - We demonstrate compliance with contractual commitments - We promote good hiring practices - We achieve the achievement of relational objectives between the entity and the supplier - We promote environmental, social and governance aspects
Opinion Leaders/Media Media, columnists and people of influence in public opinion and union leaders for whom we are a source of information and who have an impact on the stakeholders' perception of Findeter.	- We share valuable information - We activate conversations of general interest with experts - We participate in public policy sessions We generate two-way communication
Collaborators All those people linked to the entity and who constitute its main resource. They participate in the Findeter- Syndicate mission processes and activities.	- We generate work environments of equity and inclusion - We have a family-responsible business model – efr - We promote growth and development

	- We enable free associativity We promote spaces for safety and health at work
Management and Governing Bodies The internal governing bodies that dictate the ethical standards, principles and procedures under which Findeter must be governed and operated. Board of Directors, Shareholders (partners and owners of the company in proportion to their interest), Management, Directors. The Ministry of Finance is the majority shareholder. The Financial Holding is included among the Shareholders.	- We facilitate decision making strategic - We generate public and transparent information - We seek financial balance and profitability of our operation - We have a policy of ethics and good governance

III - Corporate Governance Policies

A. Management Policies

The Company's management policies are born from the decisions of the General Shareholders' Meeting, Board of Directors and CEO. In turn, the CEO and his Management Team are responsible for the adherence to the management policies and carrying out the actions that lead FINDETER to fulfill its Mission and achieve its Vision in accordance with the Strategic Management adopted by the governing bodies.

Each of these bodies will carry out its duties in accordance with the provisions of the Colombian Code of Commerce and the Organic Statute of the Financial System, the Corporate Bylaws and the Corporate Governance Code.

1. General Shareholders' Meeting

The General Shareholders' Meeting is the Company's top governing body and is the formal space where shareholders exercise their rights. It is governed by the provisions of the Law, the Corporate Bylaws and the Rules of the General Shareholders' Meeting contained in Annex 1 hereto.

1.1. Shareholders

The Nation, national, department, district or municipal public entities, national or foreign natural and juridical persons, international organizations, legal persons of international public law and the Colombian Central Bank may be shareholders of FINDETER.

Shareholders other than the Nation may not have a shareholding interest greater than thirty percent (30%) of the capital stock.

1.2 Shareholder Rights

Each share confers upon its owner the following rights:

a) Participate in the discussions of the General Shareholders' with voting power.

b) Trade shares, within the limits set out in the Law and the Corporate Bylaws.

c) Freely, at their discretion and when they consider it pertinent, inspect the books and corporate papers fifteen (15) business days prior to the General Shareholders' Meetings in which the year-end balance sheets and financial statements are analyzed. The same procedure shall apply for the publishing of the annual report approved by the General Shareholders' Meeting, which will include at least the financial statements and notes thereto, the Independent Auditor's opinion and an analysis of the Company's progress.

d) Request FINDETER, when required, copies of the annual report approved by the General Shareholders' Meeting.

e) Hire specialized audits to be executed in FINDETER.

f) Exercise any other duties conferred upon by law and the Corporate Bylaws.

Everything related to the operation of the General Shareholders' Meeting is contained in the Bylaws and in Annex 1 Rules of the General Shareholders' Meeting.

1.3 Additional measures for the protection of shareholders

To protect the rights and fair treatment of shareholders, the Company will implement the following measures in addition to those required by law:

a) Explain in detail to shareholders the operations that may result in equity dilution of minority shareholders, for example, capital increase waiving the right of first refusal in the subscription of shares, merger, spin-off or demerger, among others. The measure to be adopted will be initially reported to the Board of Directors, which may appoint an independent external advisor, with recognized relevant experience and good reputation, to issue a "fairness opinion" on the terms of the transaction.

b) Ensure maximum dissemination and distribution of meeting calls and documents

related to the issues to be discussed in the meeting's agenda using the traditional means provided by law, as well as electronic means such as the corporate website, e-mails and even social networks. In developing this measure, FINDETER will make available to shareholders, prior to the General Shareholders' Meetings (either ordinary or extraordinary), the following information on the website: i. Call notice (date, time and place), ii. Outlined agenda, iii. List of candidates nominated by shareholders to be part of the Board of Directors when the election is part of the agenda of the General Shareholders' Meeting, once said list is known.

c) Through these same electronic means, shareholders can request any relevant information or clarifications related to the Company regarding the issues included in the Agenda of a Shareholders' Meeting, with the documentation received and, in general, on any subject of interest related to the Company.

   This information will be made available simultaneously to the other shareholders, in order to ensure its dissemination and fairness. Nevertheless the Company, through its different bodies and with legitimate reason, shall be entailed to deny the delivery of the information when it has legal reserve, is confidential or is considered unreasonable and irrelevant.

1.4 Selection policies for the Security Holders' Legal Representative

In the event that FINDETER has any debt securities issued in the public securities market that, in accordance with current regulations, require Security Holders to have a Legal Representative, the Company will select a juridical person with legal capacity and sufficient experience to protect the security holders' interests. The security holders' legal representative must certify that they are not involved in any of the inabilities and incompatibilities established by law.

The investors' meetings, calls, quorum, agenda and proposals, duties or responsibilities, regulations, and all aspects related to the figure of the security holders' legal representative will be established according to the provisions of Decree 2555 of 2010, as amended, complemented or replaced, and other current applicable standards.

2. Board of Directors

As one of the highest governing bodies in FINDETER, the Board of Directors determines the Company's general management and development policies, ensures that the CEO and his Executive Group comply with and observe the policies in question and liaises with shareholders. The Board's actions seek the best results for the Company.

FINDETER´s Board of Directors will be made up of nine (9) all main members, who will be elected by the General Assembly of Shareholders, for a period of two (2) years each. At least three (3) of its members will be women. One (1) line will correspond to an employee of the entity.

The Board of Directors acts in accordance with the provisions of the Law, the Corporate Bylaws, and the Rules of the Board of Directors contained in Annex 2 of this Code.

2.1 Evaluation

The activities of the Board of Directors as a collective body and its committees will be evaluated annually through a self-evaluation process, coordinated by the Chairman of the Board and the Corporate Governance Committee. The self-evaluation will consider at least the following: their monitoring of the main affairs of Findeter; the evaluation of their tasks and their contribution to define the strategies and projection of the Company; their adherence to corporate principles; compliance with the provisions of the Corporate Governance Code; their knowledge of the Company; attendance at meetings; and active participation in decision-making. It is considered good corporate governance practice to hire a specialized third party to evaluate the management of the Board of Directors.

The self-evaluation may be complemented with the relevant guidelines issued by the General Directorate of State Participations of the Ministry of Finance and Public Credit or with a third-party evaluation, as determined.

The results of the evaluation will be incorporated into Findeter's Annual Corporate Governance Report.

2.2 Remuneration

The payment of fees will be recognized to the members of the Board of Directors, for their attendance at ordinary and extraordinary meetings and to the Support Committees for the Board of Directors, in accordance with the remuneration scheme defined by the Ministry of Finance and Public Credit.

2.3 President of the Board of Directors

The President of the Board of Directors will perform the functions assigned to him in the Regulations of the Board of Directors, and for these reasons, he will be recognized with an additional 20% on the fees of the other members of the Board of Directors or what, it is approved by the General Assembly of Shareholders or by the Ministry of

Finance and Public Credit, as appropriate, in accordance with the provisions of the Statutes, which, in any case, will not exceed the 20% established here..

2.4 Committees that support the management of the Board of Directors

To carry out its functions, the Board of Directors has the advice and support of up to four (4) support committees. In accordance with the law or defined by it, integrated and designated by it. The committees are the following: Audit Committee, GAP Committee (Asset and Liability Management), Corporate Governance Committee and the Credit Committee to support the Board of Directors, which act as a filter and reinforce the objective analysis of the decisions that correspond to the Board of Directors; These will submit periodic reports to the Board on the development of their activities.

For the purposes of the operation of these committees:

a) They may only be made up of a maximum of three (3) members according to the expertise and knowledge of the topics of the Board Committees.

b) At least one (1) of the members of each Committee must be independent; the foregoing without prejudice to the minimum number of independent members that by law must make up the Audit Committee; and

c) For their operation, in addition to the provisions of the current regulations that apply to them, the Committees will have an Internal Regulation that establishes their objectives, functions and responsibilities.

Each of the support Committees before the Board of Directors will present a semiannual report regarding its management throughout that period.

2.4.1 Audit Committee

The Audit Committee supports the Board of Directors in making decisions regarding the control and improvement of the Internal Control System (ICS). The Audit Committee is responsible for defining the structure and supervision of the operation of FINDETER'S Internal Control systems, to determine whether the designed procedures reasonably protect the Company's assets, ensuring the transparency and proper use of financial information, and acts in accordance with the provisions of External Circular 029 of 2014, issued by the Financial Superintendence of Colombia, as amended or replaced.

2.4.1.1 Composition

It will be made up of three (3) members of the Board of Directors, mostly independent. The members of this committee must have experience and knowledge in the topics related to the functions assigned to said Committee. Likewise, this Committee must be chaired by an independent member.

2.4.1.2. Duties

The Audit Committee will have the following main duties:

Functions regarding the control environment

a) Approve the following documents and policies:

• Structure, procedures and methodologies of the SCI with lines of responsibility and accountability.

• Annual internal audit plan.

• Audit quality assurance and improvement policy

b) Review and recommend for approval by the Board of Directors, the following documents and policies:

• Code of ethics and conduct.

• Policy for generating and submitting reports on the SCI.

• Information security policy.

• Internal audit statute.

• Strategic technology plan.

Functions regarding Risk Management

a) Present to the Board of Directors a report on the decisions taken by the Audit Committee, at least every 6 months, or more frequently, if appropriate.

b) Evaluate the risks that may affect the execution of strategic planning and those

derived from changes in Senior Management and their impacts on the SCI and, if necessary, recommend the measures it deems appropriate to mitigate said impacts.

c) Propose to the Board of Directors controls to prevent, detect and respond appropriately to the risks of fraud.

Functions regarding control activities

a) Approve the methodology to define the criticality of the findings of the internal audit, the fiscal audit and the external audits, if applicable.

b) Monitor the functions and activities of the internal audit, in order to verify that it maintains its independence and objectivity in relation to the activities it audits, and identify possible limitations that prevent its adequate performance.

c) Evaluate the structure of the Internal Control System in order to determine whether the designed procedures reasonably protect the assets of the Entity and the third parties it manages or custody.

d) Ensure that the preparation, presentation and disclosure of financial and accounting information conforms to the provisions of current provisions and the financial performance goals defined by the Entity, verifying that the necessary controls exist for this purpose.

e) Evaluate and approve the internal audit proposals, related to the hiring of specialized external auditors.

f) Evaluate whether the Internal Control System reasonably ensures the functioning of the information systems, their reliability and integrity for decision-making, and propose to the Board of Directors the measures that may be necessary to solve the vulnerabilities that are detected.

g) Evaluate the reports prepared by the internal audit, the tax auditors and the external auditors, verifying that their suggestions and recommendations have been implemented.

Functions regarding information and communication.

a) Prepare the report that the Board of Directors must present to the highest corporate body at its ordinary meeting regarding the operation of the Internal Control System

during the previous period, which must include, at a minimum, the following:

• The process used to review the effectiveness of the Internal Control System, with express mention of aspects related to risk management.

• The most relevant activities developed by the Audit Committee.

• The material deficiencies detected, the recommendations made and the measures adopted, including, among other aspects, those that may affect the financial statements and the management report.

• The observations made by the control bodies and the sanctions imposed on the entity, when applicable.

b) If there is an internal audit department, the evaluation of the work carried out by said area, including, among other aspects, the scope of the work carried out, the independence of the function and the assigned resources.

c) Serve as a communication channel regarding internal control between Senior Management and the Board of Directors.

d) Maintain continuous communication with the internal audit, through the president of the Committee.

e) Inform the Board of Directors, when it notices that the entity does not provide the information required by the competent authorities and control bodies.

f) Request the reports that it deems appropriate for the proper development of its functions.

g) Present to the highest corporate body, through the Board of Directors, the candidates to occupy the position of Statutory Auditor, without prejudice to the right of shareholders to present other candidates. For this purpose, it is the responsibility of the Committee to compile and analyze the information provided by each of the candidates and to submit the results of the study carried out for consideration by the highest social body.

Functions regarding follow-up and monitoring activities

a) Continuously evaluate compliance with the standards and policies that make up the control environment and request from Senior Management the reports it deems necessary.

b) Follow up on compliance with the instructions given by the Board of Directors, in relation to the SCI.

c) Monitor compliance with the annual internal audit plan.

d) Evaluate the efficiency of the internal audit in terms of resources and results, reporting to the Board of Directors the inefficiencies noted.

e) Review and evaluate changes in the entity's environment and its business model, whenever they may affect risk management or the fulfillment of its strategic objectives.

f) The others established by the Board of Directors in its internal regulations

The Committee must meet every three (3) months, or more frequently when warranted by the results of the evaluations of the Internal Control System, or when deficiencies are detected in the Internal Control System that require urgent or urgent evaluation and corrective measures. when there are significant changes in the Entity's policies or in the regulations that regulate its operations.

The Committee will meet with half plus one of its members and will decide with half of those attending.

When the Committee considers it pertinent, it may invite other FINDETER Directors and employees to its meetings, in order to provide explanations about Internal Control matters, who will have a voice, but no vote.

The decisions and actions of the Audit Committee must be recorded in minutes. The documents known to the Committee that support its decisions must form an integral part of the minutes, therefore, if they are not transcribed, they must be presented as an annex to them.

The Head of the Office of Internal Management Control will act as technical secretary of the committee, who will be in charge of summoning, preparing, compiling and keeping the minutes, as well as monitoring the evolution of the tasks assigned there.

When situations of significant importance are detected, a special report must be sent to the Board of Directors and the Legal Representative.

The Board of Directors must present to the General Assembly of Shareholders at the close of the financial year, a report on the work carried out by this Committee.

2.4.2 Corporate Governance Committee

The Corporate Governance Committee supports the activities of the Board of Directors regarding FINDETER'S corporate governance. Its purpose is to recommend to the Board of Directors systems for the adoption, monitoring and improvement of best practices in the organization and other duties assigned by the corresponding rules.

2.4.2.1 Composition

FINDETER's Corporate Governance Committee will be made up of three (3) members of the Board of Directors, who will be appointed by it. At least one (1) of its members will be independent. Likewise, this Committee must be chaired by an independent member.

2.4.2.2 Duties

a) Propose to the Board of Directors adjustments and reforms for the correct execution of the Corporate Governance Code when deemed necessary.

b) Study the reform proposals to the Corporate Governance Bylaws and Code related to the company's corporate governance and present any amendments, updates and repeals of Corporate Governance provisions.

c) Organize the annual self-evaluation process of the Board members in accordance with commonly accepted self-evaluation methodologies.

d) Review the results of the annual self-evaluation of the Board's management, and make suggestions for the better operation of the Board, taking advantage of the resources and technology available.

e) Prepare for the Board's consideration a preliminary evaluation of the performance of the CEO of FINDETER.

f) Review the Annual Corporate Governance report submitted by the CEO to the Board of Directors, ensuring that it reflects compliance with the Corporate Governance policies adopted by the Company, as well as the changes implemented at year end.

g) Check the annual report prepared by the investor relations area of the Finance VP, on the activities carried out to comply with the best practices of disclosure of information to the Company's investors.

h) Ensure that the induction process of the new Board members is followed and

promote the training and updating of the members on issues related to the powers of the Board of Directors.

i) Analyze the cases of conflict of interest related to the CEO and report to the Board of Directors for a final decision.

j) Monitor the progress of FINDETER'S Strategic Planning and make recommendations for setting goals and indicators prior to the presentation of the Board of Directors.

k) Recommend for the Board's approval any modifications to the payroll, the organic structure and the remuneration scales of the positions in the different categories.

l) Submit to the Board of Directors, through the Chairman of the Committee, an annual report of the Corporate Governance Committee, indicating the number of ordinary and extraordinary meetings held and the recommendations and decisions adopted therein.

m) Review and update the profiles of the members of the Board of Directors.

n) Coordinate the selection process of the President with the advice of a firm or person specialized in recruiting management-level positions or evaluating resumes in accordance with the policies issued by the Board of Directors.

o) Verify prior to their appointment that the candidates presented by the President of Findeter to occupy the Senior Management positions of Findeter meet the requirements established for their profiles, as well as compliance with the procedure provided for their selection in accordance with the manual of functions, requirements and general competencies of Findeter.

p) Review compliance with the qualifying requirements of employees who apply as members of the Board of Directors referred by the Human Talent Headquarters of the General Secretary, before the respective election is held.

q) Present a semiannual report regarding its management throughout that period.

The Committee shall meet three (3) times a year and extraordinarily when necessary.

The committee will meet with half plus one of its members and will decide with half of the attendees.

The General Secretary will act as the technical secretary of the committee, who shall

be in charge of the calls, preparing, collecting and filing the minutes, as well as monitoring the evolution of the tasks assigned therein.

2.4.3. Asset-Liability Committee (ALCO)

The objective of the Asset-Liability Committee (ALCO) is to approve and monitor the investment strategy of the investment portfolio, as well as reviewing the structure of assets and liabilities based on the policies set out by the Board of Directors.

2.4.3.1 Composition

The GAP Asset and Liability Management committee is made up of three (3) members of the Board of Directors. At least one (1) of its members will be independent. Likewise, this Committee must be chaired by an independent member. On the part of the administration, the President or his delegate, the Vice President of Planning, the Vice President of Finance, the Vice President of Risks and the Director of Treasury will attend with voice, but without vote.

Workers who, due to their knowledge of the issues to be discussed in the GAP Asset and Liability Management - GAP committee, may also attend as guests and may intervene with voice, but without vote.

2.4.3.2 Duties

The Committee will have the following duties and responsibilities:

a) Submit, together with the Risk Committee and ALCO (Asset-Liability Committee), for the Board's consideration, the risk-return ratio expected for investments in the Investment Portfolio to propose next year's goals.

b) Propose to the Board of Directors next year's income budget of the Investment Portfolio, in accordance with the provisions of the Company's general budget.

c) Approve a theoretical benchmark portfolio for the monitoring and evaluation of the Investment Portfolio.

d) Approve the Strategic Asset Allocation of based on investment policies and portfolio objectives.

e) Determine the maximum duration of the investment portfolio and define the maximum deviations allowed in the strategic asset allocation.

f) Set out the policies associated with the maximum loss limits (stop loss) of the investment portfolio.

g) Consider the investment recommendations made by the Treasury Department.

h) Approve new classes of assets, operations, businesses and investment opportunities.

i) Approve investment sale operations that exceed the established daily negotiation limit and that are expressed in current legal monthly minimum wages or in US dollars, as applicable.

j) Monitor performance in investment management in terms of the risk-return ratio.

k) Receive reports from the Risk Management Committee and ALCO and also review and recommend their approval to the Board of Directors, where applicable.

l) Review on a quarterly basis the composition of the portfolio and funding by type of currency and rate, as well as the duration and term of the asset-liability management, providing further management recommendations.

m) Submit a semi-annual report regarding its activities throughout the period

The Committee will meet at least once (1) a month and extraordinarily when necessary. The Committee will meet and deliberate with two (2) of its members. Decisions will be made unanimously.

The Treasury Director will act as the technical secretary of the committee, who shall be in charge of the calls, preparing, collecting and filing the minutes, as well as monitoring the evolution of the tasks assigned therein.

2.4.4. Credit Committee

The objective of the Credit Committee is to monitor and recommend to the Board of Directors the general guidelines and conditions of the lines of credit.

2.4.4.1. Composition:

The Board of Directors Support Credit Committee is made up of three (3) members of the Board of Directors. At least one (1) of its members will be independent. Likewise, this Committee must be chaired by an independent member. On the part of the

Administration, the President or his delegate, the Vice President of Planning, the Vice President of Finance, the Vice President of Commercial, the Vice President of Risks and the Vice President of Operations will attend with voice, but without vote.

2.4.4.2. Duties:

a) Recommend for the Board's approval the policies, guidelines and general conditions for on-loan and direct credit operations.

b) Recommend for the Board's approval any amendments to the policies, guidelines and general conditions for on-loan and direct credit operations.

c) Determine and recommend for the Board's approval any issues that, according to the policies, fall within the scope of responsibilities of this body.

d) Receive reports associated with credit management and control.

e) Be aware and validate the implementation of current regulations that apply to Findeter in accordance with the supervisory agencies.

f) Be aware of the reports of the Supervisory Agencies regarding issues within its scope of responsibility.

The Committee will meet three (3) times a year and extraordinarily when necessary. The Committee will meet and deliberate with two (2) of its members. Decisions will be made unanimously

The Operations VP will act as the technical secretary of the committee, who will be in charge of the calls, preparing, collecting and filing the minutes, as well as monitoring the evolution of the tasks assigned therein.

3. CEO

3.1 Election

The President of FINDETER will be elected, evaluated and removed by the Board of Directors. The election will be made through a selection process coordinated by the Corporate Governance Committee with the advice of a firm or person specialized in recruiting management-level positions or evaluating resumes, considering the succession policy or the document approved by the Board of Directors.

FINDETER will advance the selection process, verifying, in addition to experience and suitability, compliance with the other requirements established by the Board of Directors. Candidates must meet the conditions of experience and professional training and have a good name, to serve as President of Findeter and be in charge of the Legal Representation and Administration of the Entity. Additionally, candidates must not find themselves in any of the situations provided for as disabilities and incompatibilities of legal representatives and members of the board of directors referred to in the general and special regulations on the matter. The President, in order to act as legal representative, must complete the possession process before the Financial Superintendency of Colombia, where the objective and subjective requirements of the candidate will be evaluated.

Until the Board of Directors makes a proper appointment, the Secretary General will act as Alternate President of the Financial Company, and in his absence, the Financial Vice President or the Commercial Vice President will act as substitute, in that order. If the absence of the President is absolute, the Secretary General will assume the position while the Board of Directors fills the position. In any case, the term provided in the legislation for the appointment of presidents of financial entities must be met.

The other functions that the Law and the statutes determine or that are related to the organization and operation of FINDETER are the functions of the President.

3.2 Qualities of the President

The President of FINDETER must meet at least the following qualities:

a) Executive with more than five (5) years of professional experience in public or private entities, meeting criteria of suitability, knowledge, experience in relation to the corporate purpose of the Company.

b) Management capacity that demonstrates leadership and teamwork, criteria to anticipate and react appropriately to regulatory, financial or economic risks, and negotiation, strategic planning and relationship skills.

c) Not be involved in situations of conflict of interest, disabilities or incompatibilities.

3.3 Duties

The Company's CEO has at least the following duties:

a) Acting in good faith, with loyalty, diligence in management and business, making

FINDETER'S interest prevail. Under these principles, the CEO must act as the official spokesperson for the Company.

b) Refraining from participating individually or through an intermediary for personal interest or of third parties, in activities that involve competition with the company or in acts with respect to which there is a conflict of interest, unless otherwise expressly authorized by the Board of Directors or General Shareholders' Meeting.

c) Fulfill and promptly enforce the legal requirements relative to the Company's operation and activities, as well as the Bylaws and decisions of the Shareholders' Meeting and the Board of Directors.

d) Appoint, lead, and remove the Company's personnel, in accordance with current provisions and strive for a healthy work environment.

e) Ensure the correct application of resources and the proper maintenance and use of the Company's assets.

f) Implement the strategies and policies approved by the Board of Directors to achieve the goals set by the organization.

His decisions regarding the Company's management and in line with his duties will be autonomous and independent, they must adhere to current internal and external rules. He may not participate in activities that are detrimental to the Company.

3.4 Reporting and Accountability

The effective accountability of the CEO'S management will be provided in the management report submitted by the CEO to the Board of Directors in ordinary or extraordinary sessions, as applicable, either on regular issues that are brought to the Board or special issues that are requested regarding the programs and the Company's ordinary course of business.

In addition, the CEO will address the accountability reports prepared through the Ministry of Finance and Public Credit, the Presidency of the Republic and other national entities or the community, as required.

The CEO and the Board of Directors will, in ordinary or extraordinary sessions, submit a joint report to the General Shareholders' Meeting on the activities carried out by the Company, after the Board's consideration. This report must contain the behavior observed by the Company in terms of credit, program development, financial, economic, administrative, legal situation, technological support, environmental

management and level of compliance with the rules on intellectual property and copyright, among others, as well as the main results and their impact and the Company's medium and long-term projections. The consolidated financial statements and accompanying notes, the Independent Auditor's opinion and the Audit Committee's report will be evaluated.

3.5 Remuneration

The CEO'S remuneration will be established by the Board of Directors, considering the Company's nature, the responsibilities of the position and the market guidelines.

3.6 Evaluation

The Board of Directors will evaluate the performance of FINDETER'S CEO.

4. Management Team

FINDETER has an organizational structure that consistently supports the coordinated pursuit of its mission, which allows it to integrate internal and external customer services and the services it provides, optimizing human talent and available resources.

The Management Style of the CEO and the Management Team essentially focuses on being a guide or advisor, generating trust and respect, facilitating participation and communication, delegating with responsibility for timely decision-making, managing clear allocation policies, transparent and rational use of resources, and working with quality. They are also committed to the policies and practices of: human management, risk management and internal control system. Furthermore, motivating an ongoing and integrated improvement and timely addressing commitments with stakeholders, highlighting their responsibility with supervisory agencies, is always a priority.

Senior Management will have functions with respect to each of the components of the internal control system, that is, the control environment, risk management, control activities, information and communication and follow-up and monitoring activities, in the terms described in the Basic Legal Circular, in addition to those specific to the position.

4.1 Composition

The Management Team consists of the CEO and the positions listed below: General Secretary, Finance VP, Commercial VP, Operations VP, Technical VP, Risk VP and Planning VP. They are also part of Senior Management, Strategic Affairs Manager,

Communications and Social Responsibility Manager, Presidential Advisory and Compliance Officer.

4.2 Appointment

The Management Team will be appointed by the President of FINDETER, prior verification of experience and suitability requirements by the General Secretary of Findeter as well as other requirements considered by the President. Candidates who opt for one of these positions must meet the conditions of professional and ethical suitability necessary to fulfill the responsibilities of the position.

The Directors must complete the possession process before the Financial Superintendency of Colombia, where the objective and subjective requirements of the candidate will be evaluated.

4.3 Evaluation

The evaluation of Senior Management will be carried out as described in the procedure established for the evaluation of performance or development management.

4.4 Remuneration

In accordance with the provisions of section f) of article 42 of the current Corporate Bylaws, the Board of Directors will establish the remuneration of Findeter's Management Team. Additionally, it approved the Strategic Variable Premium Management Policy as of 2013, which is contained in the document Integrated Management System Code GH-DA-021, in accordance with literal g) of article 42 of the current Bylaws..

4.5 Responsibilities

The responsibilities of the Management Team are the following:

4.5.1 Secretary General

The General Secretary leads, controls and ensures the development, application and management of legal and physical resources and human talent within the Company, in order to ensure compliance with its plans, programs and projects. It must also ensure that the Board and General Shareholders' Meetings properly adhere to the Corporate

Bylaws and the Law and that the requirements of the control and supervisory agencies are timely met.

4.5.2 Finance VP

The Finance VP is responsible for guiding, leading and evaluating the activities aimed at advising the Board of Directors, CEO and other Governing Bodies on the design, development, implementation, control and adjustment, within the Law, of the policies, financial strategies and procedures that allow the Company to meet its objectives; proposing, developing and controlling FINDETER'S financial policies, in accordance with the corresponding regulations and considering the aspects that minimize financial risk; and also developing tools for an integrated urban management to support institutional strengthening locally and regionally.

4.5.3 Commercial VP

The Commercial VP is responsible for executing the commercial policies and strategies of the Company's financial and technical products, its relationship with financial intermediaries, establishing strategic alliances with the public and/or private sector, promoting and executing planning tools for cities and the competitiveness that support institutional strengthening locally and regionally and maintaining the good image of the Company, which is reflected in the achievement of businesses that make a positive impact due to the type of program or project, the beneficiary, the amount and number of disbursements.

4.5.4 Risk VP

The Risk VP is responsible for designing the methodologies to identify, measure, control, monitor and communicate the risks to which the company is exposed in accordance with the different standards applicable to each of the Company's Risk Management System. The Risk VP must also design the policies that make use of these methodologies for the Board's approval, advising both Senior Management and the Company in general on risk management.

4.5.5 Operations VP

The Operations VP is responsible for planning, organizing and controlling the programs, processes, tasks, operations and activities related to the provision of banking transactions, management of FINDETER'S portfolio and managed funds, and IT management, to make the Company's operations highly competitive in the financial sector, with an excellent service. The position is also responsible for leading and

managing the areas of Technology, Operations, Portfolio Origination and Portfolio and Standardization, with the aim of achieving institutional objectives.

4.5.6 Technical VP

Responsible for managing, planning and executing the programs, plans and/or projects assigned to FINDETER by the Nation or derived from agreements signed by the Company with other institutions, considered of special nature, and assigned by the Company's CEO.

4.5.7 Planning VP

Responsible for leading the Company's strategic planning processes, in order to define objectives, performance goals, indicators and persons responsible; planning, organizing, managing and evaluating the budgeting of the areas to ensure they adhere to the Company's Strategic Plan; establishing the guidelines, methodologies, policies and practical improvements within the processes and ensure their application within the Company.

B. Internal Control Mechanisms

1. Three lines

Findeter through the model of the Three Lines facilitates the improvement of communications in risk management, as well as its control to ensure the proper result of the initiatives related to management.

As the first line, workers and the management group are responsible for identifying the risks associated with the activities they carry out in the development of their operation and implementing the necessary controls. They have the ownership, responsibility and accountability to assess, control and mitigate risks.

As a second line, the Vice Presidency of Risks is responsible for evaluating risk management, supporting the identification of controls for risk mitigation, verifying the correct application of controls and providing its specialized knowledge for directing the risk. Entity. They facilitate and monitor the implementation of effective operational risk management practices and assist risk managers in the presentation of information related to those risks.

As a third line, the Internal Audit, through a risk-based approach, is responsible for

executing assurance and independent advisory activities; provides assurance to the organisation's governing body and senior management about how the organization assesses and manages its risks, including how the first and second lines operate. This task ensures that all elements of the institution's risk management framework are covered across the organization, senior management and the board of directors.

Under the new lines model, the Statutory Auditor, the Comptroller and the Certification Audits in the Management Systems that Findeter has, will be classified as additional assurance providers, to satisfy the legislative and regulatory expectations that serve to protect the interests of the companies. stakeholders and satisfy requests from management and the governing body to supplement internal sources of assurance.

2. Principles of the Internal Control System (ICS)

An essential input that supports the Internal Control mechanisms in the Company is to promote the application of the ICS principles on the regular workday, namely: self-control, self-regulation and self-management. These contribute to the adequate fulfillment of the responsibilities and functions of the Company's managers and workers.

The workers' systematic application of self-control, self-regulation and self-management gives the Entity confidence and reasonable security for the achievement of its objectives, while adhering to the applicable law.

a) Self-control. Self-control in FINDETER corresponds to the ability of all employees to evaluate and control their work, detect deviations and make corrections while exercising and fulfilling their duties and responsibilities, as well as to improve and innovate. It is worth mentioning the duty of all Company workers to fulfill the institutional objectives in the development of their tasks and with the application of appropriate operating processes.

b) Self-regulation. It corresponds to the ability of Company workers to organize internally and apply methods, standards and procedures for the development, implementation and improvement of their activities with an adequate Internal Control System, while always adhering to the applicable law.

c) Self-management. The ability of workers to effectively and efficiently interpret, coordinate, execute and evaluate the responsibilities and duties assigned to them to achieve an effective institutional operation.

3. Structure of Internal Control

The internal control system is developed and organized so that its practice is intrinsic to the performance of the duties of all the existing positions in the Company, and particularly of the duties assigned to management positions. However, there are 3 bodies that help in the implementation, development and monitoring of internal control: (i) Office of Internal Control of Management, (ii) Internal Control System Coordination Committee and (iii) Independent Auditor.

3.1 Office of Internal Control of Management

The Office of Internal Control of Management, as one of the components of the Internal Control System, is responsible for measuring and evaluating the efficiency, effectiveness and economy of the other controls, advising Management (CEO, General Secretary, VPs) on the continuity of the management process, the revaluation of the established plans and the introduction of the necessary corrective measures for the fulfillment of the planned goals or objectives, in accordance with the provisions of Article 9 of Act 87 of 1993, as amended, complemented or replaced.

To that end, it will be led by the Head of Internal Control of Management, a public employee appointed by and reporting directly to the President of the Republic of Colombia, as indicated in Article 8 of Act 1474 of 2011, as amended, complemented or replaced. To fulfill the duties of the position, the Head of Internal Control of Management will have a multidisciplinary group of professionals, with duly established procedures and methodologies.

The Head of Internal Control of Management will be responsible for carrying out the Company's systematic evaluation, identifying successes and deviations, as well as checking the existing controls, ensuring that they are sufficient and adequate. Based on the result of the evaluations and verifications, the Head of Internal Control of Management will issue recommendations to strengthen Findeter's Internal Control System.

3.1.1 Findings and Reports

The findings and reports from the audits must be reported to the CEO and General Secretary; In turn, the Head of Internal Control of Management shall prepare the necessary reports of his activities requested by the Board of Directors and the control and supervisory agencies.

3.1.2 Outsourcing the internal control service to private companies

The roles of risk assessment and evaluation and monitoring of the Internal Control System may be outsourced, according to authorization granted by the Board of Directors, in its session of October 31, 2011, and contained in minutes 254. As a best practice of corporate governance and pursuant to the provisions of Article 7 of Act 87 of 1993, as amended, complemented or replaced, the agreements signed for this purpose may not have terms greater than three (3) years, in which case, the outsourced entity may participate in open contracting processes that require giving continuity to the services of risk assessment, risk management assessment and evaluation and monitoring of the Company's Internal Control System.

3.2 Internal Control System Coordination Committee

The objective of the Internal Control System Coordination Committee is to order the necessary measures to ensure the articulated, efficient and effective operation of the Internal Control System, as established in Act 87 of 1993, Decree 648 of 2017, as amended, complemented or replaced.

3.2.1 Composition

This Committee consists of the CEO, the General Secretary, the Finance VP, the Commercial VP, the Operations VP, the Technical VP, the Risk VP, the Planning VP and the Planning and Management Manager.

Any worker that the CEO or the Committee considers necessary may attend as guest. The Committee will be chaired by the CEO, and in his absence by one of the Company's legal representatives, in accordance with the corresponding provisions of the Corporate Bylaws. The Technical Secretary of the Committee will be the Head of Internal Control of Management.

The Committee will meet semi-annually.

3.2.2 Duties

The duties of the Committee are the following:

a) Evaluate the status of the Internal Control System in accordance with the characteristics of each body or entity and approve any amendments, updates and actions to strengthen the system based on current regulations, the reports

presented by the Head of Internal Control or whoever acts as such, the governing bodies and the recommendations of the MECI team.

b) Review the information contained in the Company's financial statements and make the necessary recommendations.

c) Identify issues subject to audits with the strengthening of the internal control system.

d) Submit the risk management policy to the legal representative for approval and follow-up, especially to prevent and detect fraud and misconduct.

e) Others that may be assigned by the Company's Legal Representative.

3.3 Independent Auditor

As a private oversight body, the independent auditor is structured with the aim of providing security to shareholders and investors regarding the quality of financial information, security and conservation of corporate assets, and compliance with legal provisions and those from the Company's governing bodies, among others.

3.3.1 Appointment

In accordance with article 49 of the Entity's Statutes, FINDETER will have a fiscal auditor appointed by the General Assembly of Shareholders for a period of two (2) years and who may be re-elected for an additional period or removed at any time.

For the appointment of the tax auditor, the Company's administration will make available to the General Assembly of Shareholders, the proposals presented by accounting firms or accountants specialized in Tax Audit, with proven experience in other entities in the financial sector, that have not been subject to any sanction by control and surveillance organizations or by the Central Board of Accountants and who do not have any conflict of interest in the exercise of their position. These proposals must contain the scope of the review management, its costs and its methodology.

The Financiera, in addition to having a Principal Statutory Auditor elected by the General Assembly of Shareholders, will also have a Substitute Statutory Auditor elected for the same period as the Principal, who will replace him in his absolute, accidental or temporary absences; and will be subject to the regime of qualities, disabilities and compatibilities and responsibilities in accordance with the Law

In the event that the tax audit office completes two (2) consecutive periods providing the tax audit service to FINDETER, the firm will not be able to present itself to the next call for tax audit. However, the General Assembly may select it again, if it deems it appropriate, after declaring the respective call void.

When the above is presented, in the contracts that FINDETER signs for this purpose, clauses will be agreed in which the auditing firm undertakes to rotate the natural persons who carry out said function within at least a periodicity of five years. Likewise, it will be established that the person who has been rotated can only resume the audit of the same company after a period of 2 years.

3.3.2 Requirements

The Company's Independent Auditor will be an individual or company with proven expertise and of recognized national and international experience.

The individuals appointed to exercise the independent auditing must take office before the Financial Superintendence of Colombia.

3.3.3 Compensation and Dependence

The Independent Auditor will report only to the General Shareholders' Meeting and will receive the compensation that the latter sets out.

3.3.4 Duties

The Independent Auditor must comply with the duties set out by the General Shareholders' Meeting or the Board of Directors, provided, however, that they are consistent with those set out by the Law and the Corporate Bylaws. FINDETER'S Independent Auditor has, at least, the following duties:

a) Support, ensure and attest to all the Company's accounting and financial operations or acts and verify if they comply with the requirements of the Law and Corporate Bylaws and the decisions of the General Shareholders' Meeting and the Board of Directors.

b) Have full knowledge of the Company's operations or acts without any reservation and ensure the confidentiality of the information provided, which can only be communicated or reported in the manner and in the cases provided by the Law.

c) Submit the required reports to the General Shareholders' Meeting, the Board of Directors, the CEO and the control and supervisory agencies on the defined deadlines.

d) Report or inform to the corresponding authority any acts of corruption that have been found in the exercise of their position, within six (6) months of becoming aware of the event or having the legal obligation to know about it. In relation to acts of corruption, professional secrecy will not apply.

e) Other duties in accordance with the Law, the Bylaws, the FINDETER Corporate Governance Code and the auditing services provision agreement, which adhere to the applicable Law.

3.3.5 Inabilities and Incompatibilities

The Independent Auditor will be free of any conflict of interest that may reduce his independence. FINDETER'S Independent Auditor shall not be involved in any of the causes of inabilities and incompatibilities indicated in article 205 of the Code of Commerce, articles 50 and 51 of Act 43 of 1990 and/or other current legal regulations that imply inability or incompatibility to carry out the independent auditing exercise. Employees who act on behalf of the company that exercises the independent auditing shall be subject to the regime of inabilities, incompatibilities and responsibilities provided for the Independent Auditor, as applicable.

Independent auditing firms interested in providing their services and that participate the respective call, must attach the certification referred to in paragraph 3.2. "Guidelines related to the election of the independent auditor, exercise and delivery of the position", of Chapter III, Title I, Part I of the Basic External Legal Circular 029 of 2014, of the Financial Superintendence of Colombia.

3.3.6 Reporting

The reports submitted by the Independent Auditor will be subject to the provisions of the Law, the Corporate Bylaws and this Corporate Governance Code. To inform about the material findings, the Independent Auditor must:

a) Submit a timely, written report to the General Shareholders' Meeting, the Board of Directors or the CEO, as appropriate according to the scope of responsibilities of the governing body and the magnitude of the finding, of any irregularities that occur in FINDETER'S operation.

b) Call extraordinary sessions of the General Shareholders' Meeting, when deemed necessary.

c) In case of debt securities, inform the Security Holders' Legal Representative, when deemed necessary.

In addition, the Independent Auditor will cooperate with the official agencies that exercise inspection and supervision over FINDETER and submit the reports that may be required or requested.

The Board of Directors and the CEO of FINDETER will be made aware of the findings and reports with recommendations submitted by the Independent Auditor, and act accordingly to provide a timely response.

4. External Control Bodies

4.1 Financial Consumer Ombudsman

The Ombudsman is the spokesperson for financial consumers before Findeter, with respect to recommendations, proposals and requests. His duties include knowing and objectively and freely resolving any complaints filed in relation to a possible breach of the law that regulates the provision of the services or products offered or their quality.

FINDETER uses the figure of the Financial Consumer Ombudsman to address customers' concerns on the direct loan product, based on the regulatory provisions established by the exceptional legislation.

The duties, rights and obligations of consumers, service channels, procedures and everything related to the financial consumer policy is regulated in the Financial Consumer Service Manual, available on the Company's website: www.findeter.gov.co.

4.2 Appointment and Term

The principal and alternate Financial Consumer Ombudsman will be appointed by the General Shareholders' Meeting, in accordance with the requirements established in article 18 of Act 1328 of 2009. Prior to exercising their position, they must take office before the Financial Superintendence of Colombia.

The Financial Consumer Ombudsman will be appointed for a period of two (2) years, extendable for equal periods.

4.3 Independence and Autonomy of the Financial Consumer Ombudsman

The Financial Consumer Ombudsman will be independent of Findeter and its governing bodies, and with autonomy in terms of the criteria to be applied in exercising the position, undertaking to inform the Financial Superintendence of Colombia of any situation that impairs or limits their scope of action. In any case, the Financial Consumer Ombudsman shall refrain from acting when conflicts of interest arise in relation to a dispute or financial consumer, in which case the Alternate Ombudsman will take his place. The Financial Consumer Ombudsman may not perform in the supervised entities duties other than those relative to the position.

C. Management Policies

They include the policies that guide the coordination and implementation of FINDETER'S operating activities. The degree of control depends on four (4) main elements: policymaking, assigning personnel for the policies' execution, monitoring and compliance, and adopting corrective mechanisms. The application of the plan-do-check-act cycle (PDCA) will be a guideline in all cases.

1. Human Management Policy

FINDETER is committed to developing the skills, abilities, aptitudes and suitability of its workers and to strengthening the work-life balance. In this sense, it will determine guidelines and practices for the management of human talent where the principles of justice, fairness, impartiality, transparency and equal opportunities prevail.

When carrying out the selection, induction, training, promotion and development management evaluation processes, the rights of workers are guaranteed through practices aimed at preventing workplace harassment, discrimination based on gender, race, social condition, religion, region or another condition, as well as preventing practices considered non-transparent for the selection of personnel, enhancing the competencies to assume the role for which they were hired or other roles that the Financial Company requires for the operation, allowing business continuity to be ensured and minimizing the risk of personnel rotation.

The remuneration of FINDETER workers will be established in accordance with the responsibilities, requirements and functions of the position to be held, taking into account the salary scale set for each one.

To ensure the functioning of the Entity's objectives, La Financiera designed the Manual of functions, requirements and general competencies, which becomes a permanent

consultation document for all employees of the Entity that guides the understanding of the different positions through of the description of the functions, requirements and competencies of each of them. In this way, we seek to minimize ignorance of the obligations of each of the positions, duplication or segregation of responsibilities, or ignorance of the administrative and operational procedures of the Financial Institution.

Likewise, through the Human Management policy, the continuous improvement of the efr (family responsible company) and occupational health and safety management systems is guaranteed.

The Work Environment Index (IAL) is measured annually, which allows the creation of company value from the construction, recognition and interaction of the three basic relationships that occur in any workplace: trust, camaraderie and pride, with these results improvement plans are developed that allow us to close gaps with a view to making Findeter the best company to work for in Colombia

Training for Findeter is a corporate strategy that encourages the creation of shared value: it allows the worker to develop professionally and personally and the company to more effectively achieve its objectives.

2. Ethical Management Policy

The policies included in the Code of Ethics and Integrity, seek to promote and strengthen the organizational culture in FINDETER, through the permanent practice of ethical principles and values by its workers and governing bodies and thus achieve their effective contribution to the ongoing improvement of institutional management and customer satisfaction. Convinced of the above, FINDETER developed a process based on the active and democratic participation of each and every one of the members of the organization, who freely and consciously chose the values that govern us today.

2.1 Ethical Guidelines

The ethical guidelines determine how FINDETER should relate to its stakeholders, achieving consistency between ethical principles, corporate policies, established values and best institutional practices. These guidelines are included in FINDETER'S Code of Ethics and Integrity.

3. Internal Control

FINDETER will ensure that its workers take into account the principles of self-regulation, self-management, self-control and ongoing improvement, by applying

strategies that as a whole are aimed at achieving an efficient, effective, impartial, integrated and transparent management due to their knowledge of the business, planning, human talent management, verification and control of processes and the management of information and communications.

4. Inspection, Supervisory and Control Agencies Relations Policy

The Financial Superintendence of Colombia, the Comptroller General of the Republic, the Attorney General and the Independent Auditor are responsible for the inspection, supervision and control of the Company, within the scope of their respective authority. Additionally the Company is subject to the applicable regulations of the Ministry of Finance and Public Credit, the General Accounting Office of the Nation, the Presidency of the Republic, the Congress of the Republic and the Colombian Central Bank, among others, within the scope of their respective authority.

The CEO and Management are committed to maintaining harmonious relations with the supervisory agencies and other state entities and to providing the information that they legally require, in a timely, complete and truthful manner, so that they can effectively carry out their work. In addition, they undertake to implement the institutional improvement actions that the supervisory agencies recommend in their respective reports.

5. Related Party Transaction (RPT) Policy

5.1. Definition of Related Parties

A person or entity that is related to Findeter and that can exercise control, significant influence or form part of the key employees of Findeter's management.

5.2. Identifying Related Parties

FINDETER'S Related Parties consist of Shareholders who individually own more than 10% of the capital stock of Findeter, Board members, CEO, General Secretary, VPs and their family members to the 2nd (second) degree of kinship by affinity or consanguinity and by adoption.

The following are considered related parties in Findeter.

- ✓ **Shareholders**

For purposes of RPTs, shareholders are understood as those who individually own

more than 10% of Findeter's capital stock.

The Accounting Department manages Findeter's stock control chart, which details the percentage of ownership, number of shares owned, intrinsic value of the shares and earnings per share, which is updated monthly.

In relation to loans with a compensated rate with lower interest rates, which are subsidized by the Ministry of Finance and Public Credit, the recognition of these interests is controlled through the Portfolio management application; as for accounting, control is exercised in the special account Fund called compensated rate. Performing monthly reconciliations of the cleared values and the refunds made to Findeter.

- ✓ **Board of Directors**

Board members appointed by the General Shareholders' Meeting.

Board members will receive as compensation for their participation in ordinary and extraordinary sessions and in support committees the fees established by the Ministry of Finance and Public Credit through an Administrative Act, as the only economic relationship with the entity.

Control in the settlement of the Board members' Fees is exercised through the attendance list included the respective Board meeting minutes. This information will be the tool for verifying the invoices sent by each board member, which once settled will be incorporated into the financial statements.

Notwithstanding the provisions in the inabilities and incompatibilities regime se out by law, transactions with FINDETER involving Board members and their family members to the 2nd (second) degree of kinship by affinity or consanguinity and by adoption must be analyzed in the respective instance and disclosed in the Management Report and in the notes to the financial statements. Board members must report to Management when identified an RPT.

- ✓ **Senior Management**

The Company's Senior Management consists of the CEO, the Secretary General and VPs.

The Senior Management appointed in Findeter are hired through a private employment contract under the integrated salary modality.

For payroll control purposes, Talent Management has mechanisms in place to ensure the correct settlement and payment of payroll. Furthermore, to incorporate the

resulting figures in the financial statements, there are monthly and annual reconciliations between the accounting systems and Talent systems, which ensure the correct settlement of the resources paid to Senior Management.

In turn, with Findeter's welfare policy, all workers are loan beneficiaries, including Senior Management. These loans are governed by the General Loan Rules, which set out the policies to access each line: housing, vehicle, unrestricted investment, study and domestic accidents.

To access these loans, each senior executive must comply with the conditions set out in the Rules that govern all Company employees. The Loan Committee is responsible for evaluating and approving the applications submitted, leaving record of the decisions in the minutes. The Management and Portfolio area is responsible for the documentation of each loan application, with the corresponding guarantees.

To exercise control over the execution of loans to Senior Management, the credit balances granted to the Company's officers are monthly reconciled with the balances of the portfolio application and the accounting databases.

Notwithstanding the provisions in the inabilities and incompatibilities regime se out by law, transactions with FINDETER involving Senior Management and their family members to the 2nd (second) degree of kinship by affinity or consanguinity and by adoption must be analyzed in the respective instance and disclosed in the Management Report and in the notes to the financial statements. Senior executives must report the information of their family members in the Asset Control tool.

5.3. RPT Reporting

Operations with related parties will be reported in the quarterly and annual reports and in the notes to the financial statements.

The information to report must outline: the balance of the account receivable derived from the loans of Compensated Rate with the Ministry of Finance and Public Credit; the amount paid for Board Member Fees; and the remuneration, loans granted and their balances, which will be recorded in the financial statements in favor of Senior Management.

The company has tools that allow to periodically identify operations with related parties, by including basic identification data in the asset control tool and subsequent cross-checking with the accounting database.

6. Procurement Policy

The Company will observe the legal provisions and will act diligently in the timely sufficient and fair delivery of the terms of the procurement processes to the interested parties. Additionally, the Company will evaluate the proposals objectively, under sustainability criteria and devoid of any personal interest.

On the other hand, Findeter's contractors and suppliers undertake to:

a. **Comply with social provisions and employment practices.** Comply with the procedures and measures necessary to ensure compliance with national and local policies, standards and regulations related to human rights and fair employment practices, as well as international treaties signed by Colombia on social issues. To achieve this commitment, they will comply with the guidelines and policies established by FINDETER in its Responsible Action/Sustainability Policy.

b. **Comply with environmental standards and policies**, both national and territorial, as well as international treaties signed by Colombia on environmental issues. To achieve this commitment, they will take into account the provisions of FINDETER'S Environmental Management Procedure, as well as the provisions of Act 99 of 1993 and its Regulatory Decrees, as amended, complemented or replaced. Additionally, they will comply with the special rules for the processing and granting of the specific authorizations and permits required for the use and exploitation of natural resources.

c. **Act with integrity and transparency,** both in the presentation of the proposal and in the execution of the contract. If selected, they must expressly declare that they will support the action of the Colombian State and Findeter in strengthening transparency in the procurement processes and in the execution of contracts, and will formally undertake not to carry out or facilitate acts, agreements or conducts of corruption. If they become aware of cases of corruption in State entities and specifically in Findeter, they must report them to the Secretary of Transparency of the Presidency of the Republic or the agency that acts as such and on Findeter's website www. findeter.gov.co, on the page enabled for complaints and grievances (PQRD).

d. **Knowledge of the provisions of the Corporate Governance Code**. The contracts signed by FINDETER will include clauses where contractors and suppliers agree to know the provisions set out by the Company's Corporate Governance Code.

7. Anti-Fraud and Anti-Corruption Policy

Following the guidelines of Act 1474 of 2011, Decree 1081 of 2015 and External Circular 029 of 2014, issued by the Financial Superintendence of Colombia, Findeter is aware that unethical behavior or fraud negatively affects the Company's image, and curtails the achievement of the corporate vision and goals. Therefore, the Board of Directors approved the Anti-Fraud Policy, which provides the actions that constitute fraud, the people responsible for prevention, detection and investigation, as well as the complaints procedure. The purpose of this Policy is to promote the highest ethical conduct among managers, workers, customers, suppliers, contractors and other stakeholders.

The document "Anti-Fraud and Anti-Corruption Program" defines the scope of the Policy and details the actions considered fraud and the mechanisms to avoid the improper use of privileged or reserved information.

FINDETER also has in place an anti-corruption risk map and a complaint procedure through which employees, customers, suppliers, contractors or third parties can inform the Company's Management of any fraudulent behavior.

They are all documented in the Risk Management Process and included in the Integrated Management System.

7.1 Legal Framework

The Anti-fraud and Anti-Corruption Program is in line with the following guidelines: Anticorruption Statute (Act 1474 of 2011), the *"Strategies for the Construction of the Anti-Corruption and Citizen Service Plan"* issued by the DAFP, External Circular 029 of 2014 of the Financial Superintendence of Colombia, the Law 2195 of January 18, 2022, which measures are adopted in terms of transparency, prevention and fight against corruptionand the best practices and related international standards, aligned with the SARINF Integrated Non-Financial Risk Management System and the Internal Control System – MECI.

7.2 Scope

The Anti-Fraud and Anti-Corruption Policy and the program that allows its execution contemplate and commit to the implementation, maintenance, monitoring and ongoing improvement of the application of the defined policies, the implementation of the program components and the measures in case of detecting or learning about potential incidents of acts of fraud and/or corruption.

8. Risk Management Policy

Within the risk management policy, FINDETER must have an efficient Comprehensive Risk Management System that facilitates decision-making in accordance with the risk appetite defined by the Board of Directors and that adjusts to the organization's needs and requirements. legal.

Additionally, it must ensure that its workers have a broad and permanent knowledge of the risks to which they are exposed in the development of their processes, thus generating active and responsible training in risk management.

FINDETER is committed to the adoption of mechanisms and actions that allow the identification, measurement, control, monitoring and communication of the risks of its business; according to the risk profile and appetite, the business plan, the nature, size, complexity and diversity of the activities carried out by the entity, as well as the economic environments and markets where the entity operates, to prioritize actions and criteria in decision-making regarding their effects.

9. Information Security and Cybersecurity Policy

The Information Security and Cybersecurity Policies are approved by the Board of Directors and its objective is to establish the policies, guidelines, limits, responsibilities and obligations that allow regulating the efficient management of Information Security and Cybersecurity in FINDETER, in accordance with business requirements and in compliance with current legal provisions.

These policies become the basis for the implementation of measures, controls, procedures and standards required to protect the information security and Cybersecurity of FINDETER, which are essential to guarantee the establishment, operation, continuous improvement and sustainability of the Information Management System. Information Security 'SGSI' and the entity's Information Security and Cybersecurity Risk Management System 'SARSICIB'.

Likewise, they establish the guidelines to protect and preserve the security of information assets and FINDETER information that is managed through this, in order to preserve the following fundamental principles of information: Availability, Integrity and Confidentiality.

9.1 Information Disclosure Policy

At Findeter we are convinced that transparency is an essential element to strengthen

trust and credibility among our shareholders, investors and stakeholders.

Therefore, for FINDETER, the disclosure of information in compliance with the criteria of security and quality of information, updated, accurate and timely, among others, corporate, financial, economic, administrative, legal, commercial, etc., constitutes a good governance practice. environmental, social and technical so that shareholders, investors and other interest groups can make informed and informed decisions.

The relevant information of the Entity will be published in Spanish and English through the FINDETER corporate website, especially: This Good Governance Code with its Annexes, the Statutes, the shareholding composition, the composition of the Board of Directors, the profiles of the members of the Board of Directors, the President, General Secretary and the Vice Presidents, the corporate presentation of the Entity, the organization chart of the Entity, the periodic and annual management and sustainability reports, the responsible action/sustainability policies with its six chapters, environmental, social and corporate governance (ESG) information, the different risk ratings of the Entity and its emissions, the relevant information reported to the Financial Superintendence of Colombia, the audited annual financial statements with their notes and statements unaudited quarterly financials and other data that must be published in accordance with the Law of Transparency and Access to Public Information (Law 1712 of 2014) or that which adds, modifies or replaces it.

The General Secretary will be responsible for the communications and the services required by the shareholders, and the Finance VP will do the same with the investors, through the Professional in charge of Investor Relations; however, the CEO will participate directly when he deems it appropriate. Said services will be provided professionally and on time, through the communication of truthful, objective and relevant information.

9.2 Classified and Reserved Information with restricted access

Reserved or classified information with restricted access is any information that workers receive in developing or on account of their relationship with the Company, either owned by the Entity or received from third parties, including, without limitation, any information of a legal, accounting, tax, technical, technological, financial or commercial nature of the Company or third parties, partners or shareholders, and customers of both.

The confidentiality obligation does not extend in any case to: (i) information that was in the public domain prior to the date on which it was delivered to the workers who receive the information; (ii) information that has been lawfully made public by the

Company's decision; (iii) information that must be delivered by legal order to authorities of any kind; (iv) information that must be made public for the proper performance of the worker's activity.

9.2.1 Mechanisms to Avoid the Use of Privileged or Reserved or Classified Information

For the disclosure of financial and non-financial information, FINDETER will take into account the current general law and the specific regulations issued by the Financial Superintendence of Colombia and the provisions of the Personal Data Protection Regime.

To determine the proper management and access privileges to the information administered in FINDETER, the classification levels established in the regime of transparency and access to public information that correspond to: Reserved Information, Classified Information and Information must be taken into account. Public.

For the implementation, establishment, operation and continuous improvement of the mechanisms required to protect and preserve the security of the reserved and classified information that is managed in the entity, the guidelines, measures and standards established in the Safety Manual must be taken into account. Information security and cybersecurity policies of the entity.

Natural or legal persons who are hired by FINDETER, when for the execution of the contracted activity they must know and/or have access to reserved or classified information that is processed by the entity, must sign a confidentiality agreement in which they are require absolute confidentiality regarding this, except for the exceptions contemplated in the law or in this Code. Likewise, in accordance with the entity's Information Security and Cybersecurity Policies, Findeter workers and third parties will be informed of their responsibilities and duties regarding information security before, during and after the termination of their contract. which implies that they must guarantee the confidentiality and confidentiality of the information of the Entity to which they have access, even if they no longer have links with Findeter.

In order to prevent natural or legal persons who are hired by FINDETER from using reserved or classified information with restricted access for the benefit of themselves or third parties, they must comply with the following guidelines:

Natural or legal persons who are hired by FINDETER must comply with the following guidelines to prevent them from using, for the benefit of themselves or third parties, the reserved or classified information to which they have access on the occasion of their

work or contractual obligations:

a) Maintain absolute confidentiality regarding all information, policies, procedures or operations that are provided, made known or to which you have access.

b) Refrain from making, for oneself or for third parties, arrangements, reproductions, adaptations or any other type of modification of the information to which one has access without due authorization from the entity's owner.

c) They may not access, use or disclose reserved or classified information of the entity without the due consent and approval of its owner.

d) Use the means or mechanisms authorized by the entity for storage, backup, distribution or exchange of this information to which they have access.

9.3 Personal Data Protection Policy

FINDETER, as the person responsible for the processing of personal data obtained within the framework of its functions, is committed to the strict adherence to constitutional and regulatory principles such as Law 1581 of 2012 and Decree 1377 of 2013, as well as the norms that develop, modify or replace the fundamental right of habeas data. Likewise, the Personal Data Protection policy is transversal to the processes and procedures of the Entity, and is based on the "Guide for the Implementation of the Principle of Demonstrated Responsibility", issued by the Superintendence of Industry and Commerce, which indicates that must include in other Organization policies elements that allow compliance with personal data protection regulations.

Similarly, the commitment to the protection of personal data that rests in the financial company is maintained under the pillars of:

a) Compliance with the principles of (Legality, Purpose, Freedom, Veracity, Transparency, Access, Security and Confidentiality).

b) Fully guarantee the rights of the owners (Authorize, Revoke, Know, update, rectify) the personal information that rests on them.

10. Integrated Management System Policy

In order to improve its performance and its ability to provide products and/or services that address the needs and expectations of its customers and stakeholders, FINDETER has an Integrated Management System (IMS), which consists of the Quality

Management System (QMS), the Environmental Management System (EMS), the Information Security Management System (ISMS), the Occupational Health and Safety Management System, the Internal Control Standard Model, the Risk Management System, the Model for managing the reconciliation of work-life balance, family-responsible company (efr), and all other complementary systems. Therefore:

At FINDETER we focus on promoting the sustainable progress of the regions, so, in line with our mission and to meet the needs of our customers, collaborators, community and other stakeholders, we develop our activities under the following commitments:

a) We comply with the legal and regulatory requirements applicable to the company and its management system.

b) With a sense of belonging, a proactive attitude and an ongoing and timely communication, we deliver excellent results.

c) We favor and encourage the development of employees and their environment, strengthening their work-life balance.

d) We protect, improve and maintain the health conditions of our workers and other actors involved in the execution of processes.

e) We have good environmental practices to raise awareness and promote the efficient use of resources in FINDETER'S activities, which ensure compliance with legal requirements, the preservation of the environment and sustainable development.

f) We manage the Company's risks by applying standards and controls aimed at improving the quality of our services, reducing the environmental impact and preserving the security of our information.

g) We maintain information security practices that ensure confidentiality, integrity and availability, thus building trust among users.

With this in place, FINDETER undertakes to continually maintain and improve the Integrated Management System.

FINDETER will establish for the Integrated Management System the indicators to measure the effectiveness, efficiency, results and impact of its activities and institutional performance, as a specific way to provide facts and data to its different stakeholders.

11. Responsible Action/Sustainability Policy

Findeter seeks to contribute to the country's sustainable development by executing activities, projects and programs for the provision of a comprehensive offer of products characterized by their relevance and positive impacts and focused on economic growth, social welfare and respect for the environment, adopting measures of corporate social responsibility, environmental management, respect for human rights, gender equality, social inclusion and sustainable purchases, through a complete, transparent, timely, inclusive and respectful relationship with each stakeholder.

11.1 Social Responsibility Policy

Findeter is committed to the development of the country, which is intended to be leveraged through actions within the framework of Corporate Social Responsibility – CSR, as a value-generating instrument, understanding that the CSR approach must be a business approach where The expectations of its interest groups are at the core of the organizational strategy, intrinsic to the entity and integrated transversally into our Strategic Plan.

This policy seeks, within the framework of compliance with national and international standards and regulations, to manage and mitigate the real and potential impacts on society and the environment of the ongoing and habitual decisions and activities carried out by the Entity and how These elements must:

• Be mediated by ethical and transparent behavior.

• Contribute to the development and improvement of the quality of life of society.

• Take into consideration the expectations of your interested parties.

• Comply with applicable legislation and be consistent with international regulations on organizational behavior.

• Contribute to the guarantee and respect of human rights.

• Integrate CSR throughout the organization and put it into practice in its relationships in its sphere of influence.

Through this instrument, Findeter seeks to position itself as a development bank from a strategic vision in decision-making, permeate the organizational culture in its

relationship with the EFR Model and qualify its operations, creating long-term value and contributing significantly to obtaining advantages. lasting competitiveness, to thereby continue our purpose as a Territorial Development Bank.

11.2 Environmental Management Policy

Findeter has good environmental practices to raise awareness and promote the efficient use of resources in its activities, which ensures compliance with legal requirements, the preservation of the environment and sustainable development.

11.3 Stakeholder Engagement Policy

Findeter, in the exercise of its functions, interacts with a wide variety of actors integrated into the following eleven groups and a focus of transversal interest, the interest groups are: i) Control Entities; ii) Government; iii) Funding Partners; iv) Strategic partners; v) Allies; vi) Community; vii) Contractors; viii) Suppliers; ix) Media; x) Collaborators and, xi) Management and Administration Bodies. Environmental protection was established as the focus of transversal interest.

11.4 Human Rights Policy

The national and international regulatory framework on Human Rights reinforces, as a determining component, the responsible and diligent management of companies in their duty to protect human rights and, likewise, ensure their respect internally and in areas derived from their operations. . Findeter's human rights policy is constituted as an instrument that embraces those elements included in the international and constitutional regulation of the Colombian State in a way that reinforces, highlights and guides ethical content that these elements involve and, therefore, are defining in organizational actions. and in its relations with its interest groups, being consistent with the essence of a State whose core is social.

We have a policy on Human Rights, transversal to the entire entity, which seeks to make the relationship between the operation of the business and respect for Human Rights a priority for the entity through the establishment of promotion and respect parameters. of the same, through the implementation of due diligence actions, the implementation of conciliation models such as the EFR Model, which allow, through risk management, to reduce the possible impacts resulting from the business operations that concern us by observing the guidelines. national and international laws that govern us for this purpose.

The above, within the framework of the guidelines established by the National

Government through the National Strategy for the Guarantee of Human Rights 2014 - 2034, which includes the National Action Plan on Human Rights, and those international treaties ratified by the Colombian State. , which states the importance of State companies being aware of the responsibility to act and be accountable for the impacts on Human Rights.

11.5 Gender Equality and Social Inclusion Policy

Findeter believes that women play an essential role in achieving solid economic growth and sustainable development in our country, and is committed to fostering and developing a culture of gender equality and women empowerment among its stakeholders in order to positively impact the social and environmental fabric where we are present. It will consistently integrate gender equality, women empowerment and social inclusion in its organizational culture, its engagement with stakeholders, and its lines of business and projects.

11.6 Sustainable Purchasing Policy

Findeter aims to transform the cause of pollution of current trends in production systems and consumer markets into more sustainable processes and influence decisions for the purchase of sustainable goods and services.

12. Public Communication Policy

As information is an essential collective good for the knowledge of internal processes and the performance of work, its production and fluid circulation will be promoted at all levels, through the implementation of procedures that ensure its adequate flow in top-down, bottom-up, vertically and horizontally.

There will be clear rules and an adequate structure for the timely and truthful disclosure of information to stakeholders. None of them may directly or indirectly use for their own interests the Company's reserved or classified information with restricted access. Directives on information security and habeas data will also be in place related cases of personal data protection, as per the legal guidelines provided by Act 1581 of 2012 and Act 1712 of 2014, as amended, complemented or replaced.

FINDETER will establish the necessary mechanisms to comply with the following guidelines:

a) Workers who handle reserved or classified information with restricted access will sign confidentiality agreements to ensure that the Company's reserved information

is not published or known by third parties; any non-compliance will be punished in accordance with the Internal Work Rules.

b) Workers who need to process personal information of a semi-private, private or sensitive nature. They must have the authorization of the right holder, and safeguard a copy of it.

c) The personal content information may only be provided to the Holders, their successors in title or their legal representatives, to public or administrative entities in the exercise of their legal functions or by court order and to third parties authorized by the Holder or by law.

d) Information and Communication with the Community: The economic, financial, accounting and management statements and reports presented by FINDETER to the respective regulatory and supervisory agencies, as well as any other substantial information, must be disclosed and will be available for the community. The means of information that may be used include direct customer service through coordination with the Marketing Department, online newsletters, brochures or circulars, free telephone line, email and website.

e) Accountability Commitment: FINDETER will enforce an effective accountability, in order to inform citizens about institutional management.

f) Complaints and Grievances: The Company will address complaints and grievances through the corresponding procedure in place, so that citizens are able to file complaints, requests, concerns and information inquiries regarding management. They will be addressed under the terms provided by law, and may be formulated through the corporate website. Additionally, the Company will have an internal line for whistleblowers, so that workers can anonymously report any illegal or unethical behavior or any activities that may undermine the risk management culture and controls in FINDETER. These complaints will be reported annually to the Board of Directors. And in no case will FINDETER and its management retaliate against the complainant or whistleblower.

g) Social Control: The Company will be prepared to readily provide any information required by citizens for the exercise of social control.

Findeter's public communication will aim to strengthen its corporate identity. Its purpose is to create brand recognition of the Company's products and services and is supported by internal procedures established for external communication, which must be transparent, comprehensive, timely, up to date, clear, true, reliable and adjusted to

the conditions of the knowledge of the recipient stakeholder.

Annually, Findeter will produce a management report in accordance with the information priorities requested by stakeholders, and will create and maintain a methodology for keeping stakeholders up to date through dialogue.

Regarding rights to request information, FINDETER will maintain a clear procedure that allows a timely and adequate response to requests from citizens and stakeholders.

Through internal communication mechanisms, workers will be informed on relevant issues of the Company, fostering a sense of belonging, dialogue and collaboration at all levels of the Organization. For this purpose, communication processes and mechanisms will be implemented for the effective interaction, sharing of common objectives, and having timely, clear, true and confidential information, as appropriate.

13. Evaluations and Self-Evaluations Policy

FINDETER, through a systematic and permanent self-assessment process, is committed to obtaining, recording and analyzing the operational management information of the entity to establish progress in Findeter's goals and objectives, as well as identify strengths and weaknesses that allow defining strategies. for continuous improvement. Likewise, through evaluations carried out by entities external to the Entity, recommendations are generated that contribute to strengthening the Internal Control System. Therefore, awareness-raising activities will be developed to strengthen the culture of self-evaluation, mechanisms or tools will be defined that support self-evaluation in such a way that recommendations are generated to evaluate management between agencies, as well as interdependence self-evaluation exercises and promotion of participation of workers in the evaluation of internal control.

D. Disabilities and Incompatibilities

Without prejudice to the specific rules established in this Code for each case, the members of the Board of Directors, the President, the Statutory Auditor and other FINDETER officials shall be subject to the system of responsibilities, disqualifications and incompatibilities provided for in the Political Constitution in its entirety.

E. Approval

The changes to this Corporate Governance Code were approved by the FINDETER

Board of Directors meeting of December 12 of 2024 and by the Shareholders Meeting held on March 10 of 2025.

All FINDETER agencies actively participated in preparing this Code and adopted the provisions of the Financial Superintendence of Colombia regarding best corporate practices. Additionally, the recommendations and practices of Grupo Bicentenario, the Colombian Stock Exchange BVC, the IFC, and UNEP-FI, among others, have been followed, seeking greater inclusion and disclosure of corporate governance practices and investor relations.

F. Validity, Monitoring and Control

This Corporate Governance Code is valid upon approval.

G. Disclosure

FINDETER'S Corporate Governance Code, as amended, will be readily communicated to stakeholders online, through the FINDETER'S website and/or other electronic means.

H. Compliance

The corporate governance practices incorporated herein are mandatory for all governing bodies, management team and workers. Anything not contemplated in this Code will be governed by the Corporate Bylaws and other current legal regulations on corporate management.

Additionally, issues related to corporate governance will be included as a mandatory module in the induction and reinduction processes of the Company's employees.

I. Monitoring

The General Secretary is responsible for periodically evaluating the observance and validity of corporate governance practices and reporting to the Corporate Governance Committee. The Office of Internal Control of Management will ensure the effective application of the contents of this Code.

J. Amendments

To keep this Code up-to-date in the face of new standards or Company requirements or by any legal provisions that may arise, the Corporate Governance Code may be amended by suggestion of the Board of Directors, the CEO or the General Secretary. Any

amendments must be submitted for the Board's approval.

ANNEX 1

RULES OF THE GENERAL SHAREHOLDERS' MEETING

A. Composition

The General Assembly of Shareholders is constituted by the shareholders registered in the share registry book or their representatives or agents, gathered with a quorum and under the conditions provided for in the Bylaws and in this Code.

Chairman of the General Shareholders' Meeting

The General Assembly of Shareholders will be chaired by the person designated by it with a simple majority of the shares present at the meeting.

Secretary of the General Shareholders' Meeting

The General Secretary of FINDETER will act as Secretary of the General Shareholders' Meeting.

Functions of the Secretary of the General Assembly of Shareholders

1. Keep the books of the minutes of the General Shareholders' Meeting.

2. Call and communicate to the meetings of the General Assembly of Shareholders held by the competent bodies for this purpose, in accordance with these statutes.

3. Deliver the information to the General Assembly of Shareholders in a timely manner.

4. Respond to requests from shareholders, related to information or clarifications in relation to the topics discussed at the meetings of the General Assembly of Shareholders and the exercise of the right of inspection.

5. Preserve the corporate documentation, duly reflect the development of the sessions in the minute books, and attest to the decisions of the corporate bodies before third parties.

6. Ensure the formal legality of the actions of the General Assembly of Shareholders and guarantee that its procedures and governance rules are respected and regularly reviewed, in accordance with the provisions of the statutes and other internal regulations of the Company.

7. Comply with other duties imposed by the General Assembly of Shareholders.

The Secretary will take special care in maintaining the reserve that, in accordance with the law and commercial practices, corresponds to the books and documents of the Company.

B. Duties

The duties of the General Shareholders' Meeting are the following:

a) Electing Board members, for periods of two (2) years.

b) Approving and amending the Corporate Bylaws.

c) Examining and approving the year-end balance sheets.

d) Ordering the formation of special, eventual or occasional reserves, specifying their use and justification.

e) Electing the principal and alternate Independent Auditor and determining their remuneration; or otherwise providing that the duties of the Independent Auditor be carried out by an individual or specialized company and determine their fees, in accordance with the provisions of article 49 of the Corporate Bylaws.

f) Ensuring proper compliance with the law and the bylaws that regulate the Company's activity.

g) Seeking that all decisions adopted are for the Company's best interests and are in line with any corporate changes.

h) Supervising compliance with the decisions made by management.

i) Analyzing reports submitted for the Board, the CEO and the Independent Auditor's consideration, and adopt any decisions they deem relevant.

j) Adopting measures for pursuing the company's best interest and the shareholders' common interest.

k) Ordering the corresponding actions against managers, workers, senior executives or the Independent Auditor.

l) Making their own rules of procedure.

m) Others as assigned by law and Corporate Bylaws.

C. Meetings and Calls

The General Shareholders' Meeting can have ordinary or extraordinary sessions.

The call to meetings will be made in writing addressed to each shareholder, through physical and electronic communications. For meetings where year-end balance sheets have to be approved, the call will be made at least fifteen (15) business days in advance. In all other cases, a five (5) calendar days' notice will suffice.

The call will include the Meeting's agenda. Any shareholder, regardless of their shareholding percentage, may propose to the Board of Directors one or more items to be discussed on the agenda of the General Shareholders' Meeting, provided that the request for the new items is justified. The shareholders' request must be made within five (5) calendar days of publishing the call.

If the Board of Directors rejects any requests supported by at least five percent (5%) of the capital stock, it must provide a written response explaining the reasons behind its decision and inform the shareholders of their right to make their proposals during the Meeting in accordance with the provisions of article 182 of the Code of Commerce.

If the Board of Directors accepts the request, once the shareholders' deadline to propose issues in accordance with the previous recommendations has expired, a supplement to the call of the General Shareholders' Meeting will be published, at least fifteen (15) calendar days before the meeting.

D. Delegation and Voting Power

Shareholders may be represented in sessions of the General Shareholders' Meeting, being capable of delegating their vote to any person, whether or not a shareholder. In any case, the delegation of blank vote must be made with voting instructions, according to the standard model for letters of representation that FINDETER provides for these purposes on its website.

E. Ordinary Sessions

Ordinary sessions of the General Shareholders' Meeting will be held within the first (3) three months of the year. The call, for which the CEO or General Secretary is responsible, will indicate the day, time and place of the meeting.

If not called, the General Shareholders' Meeting will hold session in its own right on the

first business day of April, at 10 a.m., in the Company's offices at the registered address.

F. Extraordinary Sessions

Extraordinary sessions of the General Shareholders' Meeting will be held as required due to any unexpected or urgent need of FINDETER, called by the Board of Directors, the Legal Representative, the Independent Auditor, or by at least thirty (30%) percent of the shareholders.

The call to extraordinary sessions must specify the issues over which the Shareholders will deliberate and decide. The General Shareholders' Meeting will not be able to decide on issues not included in the call. However, with the favorable vote of at least seventy percent (70%) of the shares represented, it may address other issues after the entire agenda has been discussed.

G. Quorum and Majorities

The General Shareholders' Meeting will hold session and deliberate with a plural number of shareholders representing, at least, half plus one of the subscribed and paid-in shares.

Decisions will be made by a majority of the shares represented, with the exceptions provided in the Corporate Bylaws.

H. Special Quorum

If the Meeting is called but is not held due to lack of quorum, a new meeting will be called, which will be validly held and decide with a plural number of shareholders, whatever the number of shares represented. The new meeting must be held neither ten (10) business days before nor thirty (30) business days after the date set for the original meeting.

When the Meeting is held in ordinary session by its own right on the first business day of April, it may also validly deliberate and decide under the terms of the paragraph above.

I. Development of the Meeting

The Meeting table will consist of the Chairman of the General Shareholders' Meeting, the Secretary of the General Shareholders' Meeting and the CEO of FINDETER. The Secretary of the General Shareholders' Meeting will be in charge of admitting the shareholders to the meeting, examining the powers or legitimacy of the

representatives, taking attendance, answering any questions regarding attendance; and, after starting the session, leading the discussions, giving the floor and keeping order.

J. Holding and Participation in the Meeting

Shareholders who wish to participate must first identify themselves by giving their full name and number of shares they own or represent.

Shareholders will have the opportunity to ask questions about any item on the agenda, provided that such items are of interest and pertaining to the legal or statutory scope of the Meeting.

K. Elections and Vote Count Commission

This commission will be made up of the Chairman and Secretary of the Meeting, and will be in charge of supervising the vote count to ensure transparency and legality.

L. Votes

Each shareholder will have as many votes as the number of Company shares they have subscribed and paid in.

M. Meeting Minutes

The decisions of the General Shareholders' Meeting will be recorded in minutes, approved by the Minutes Study and Approval Committee, which will consist of two (2) shareholders appointed by the Meeting in the same session.

The minutes, which will be signed by the Chairman, the Secretary and the Minutes Study and Approval Committee, must state, at least, its number, the place, date and time of the meeting, the form and anticipation of the call, the list of attendees indicating the number of shares they represent, the issues discussed, the votes cast in favor, against, or blank, the written records submitted by the attendees during the meeting, the elections held and the date and time of closure.

N. Temporary Suspension

The General Shareholders' Meeting may be suspended under the terms of the Code of Commerce.

O. Decisions

The decisions of the General Shareholders' Meeting made in accordance with the Bylaws and the Law are binding on all shareholders, even those who are absent or dissenting.

P. Specialized Audits

In accordance with the provisions of article 54 of the Corporate Bylaws, shareholders and other investors representing at least ten percent (10%) of the Company's shareholding, individually or jointly, may hire specialized audits on FINDETER, for which the following must be observed:

a) The reasons for conducting it must be detailed, as well as the events and operations to be audited, the duration and other aspects that are necessary to specify the scope and purpose of the audit. These specialized audits may be carried out within fifteen (15) business days prior to the Ordinary General Shareholders' Meeting, as part of the right to inspect the books and papers of FINDETER, in accordance with the provisions of article 11 of the Corporate Bylaws "Shareholder and Investor Rights" and in the Code of Commerce.

b) The documents indicated in article 447 of the Code of Commerce may be inspected. In no event will documents considered privileged or reserved or of third parties be violated, in accordance with the provisions of the Political Constitution and article 61 of the Code of Commerce.

c) The firms hired to conduct said audits must have, at least, the qualities of the Independent Auditor appointed by the General Shareholders' Meeting for the corresponding period.

d) The results of the specialized audit must be disclosed in the first instance to the Company's CEO, who will have fifteen (15) business days to make a statement. These results and the CEO'S statement will be made known to the Board of Directors and the Internal Auditor. The latter must evaluate the report of the specialized audit and make the relevant recommendations.

e) The working papers of the special auditor will be subject to reserve and must remain so for a period of no less than five (5) years from the date of their preparation.

f) After receiving all the reports, the Board of Directors will respond in writing as soon as reasonably possible, regarding any concerns raised by the requesting shareholders or investors.

Q. Exercise of the Right of Inspection

Within fifteen (15) business days prior to any meeting in which Financial Statements must be considered, and in any case before the ordinary meeting of the General Shareholders' Meeting, shareholders may exercise their right of inspection, over the documents established for this purpose in article 447 of the Commercial Code. When a shareholder decides to exercise the right of inspection, he/she undertakes to maintain strict confidentiality of all information revealed, in accordance with the conditions established in the Code of Good Governance for the reservation and care of the information and papers of the merchant that belong to the Company. To exercise the right of inspection, the shareholder must address a written communication to the Company's Secretary General, who, in his capacity as secretary of the General Shareholders' Meeting, must provide the corresponding information in accordance with applicable regulations. If, in the judgment of the Company's Secretary General, part of the requested information cannot be provided to the shareholder, this must be justified in a written response setting forth the legal or regulatory reasons that prevent the sharing of said information. A refusal to provide information does not prevent a shareholder from requesting it during the session of the General Shareholders' Meeting. Unless prohibited by law, the meeting will be responsible for determining whether such information should be provided or restricted, and the conditions under which such provision should be made.

R. Characteristics of FINDETER Shares

Findeter shares are nominative, ordinary, indivisible and capital. They therefore confer on their holder the rights provided in the law for this class of shares, with the exceptions provided in the Law and the Bylaws.

The General Shareholders' Meeting, however, may at any time, after meeting the legal requirements, create privileged shares and establish special series for them.

S. Rights Conferred by Shares

The shares confer on their holders all of the rights inherent to the status of shareholder in accordance with the Law and the Bylaws.

Register

The Company will keep a Shareholder Register, listing each shareholder and the number of shares they own.

Given the nominative nature of the shares, the company will recognize the quality of

shareholders or holder of real rights over shares only to individuals or companies registered in the Shareholder Register.

The disposition or transfer of shares, encumbrance or limitation, seizure or award will be effective with respect to the company and third parties only after its registration in the Shareholder Register, which the Company may not refuse except by order of a competent authority, or in the case of shares that must be negotiated under certain requirements or formalities that have not been met.

Share Certificates

The Financier will issue to all subscriber of shares, the share certificates that prove their status of shareholder.

Share certificates, whether provisional or final, will be issued in a continuous series, with the signatures of the CEO and General Secretary of the Company, and will contain the indications provided by law, in accordance with the text and under the external form determined by the Board of Directors, which may also authorize the process to dematerialize the shares.

Provisional Certificates

While the value of the shares is not fully covered, provisional certificates will be issued to subscribers. The transfer of the certificates is subject to the same conditions as the transfer of the final certificates, but the transferor and the assignees will be jointly liable for the unpaid amount.

Negotiable Shares

Shares are negotiable securities, with the limitations derived from the assignments or dispositions made by the Nation to the departments as a result of the provisions of section b), article 8 of Act 57 of 1989.

Dispositions will be registered in the Shareholder Register by written order of the transferor, either through a “Letter of Transfer” or in the form of an endorsement in the respective certificate.

To make the new registration and issue the certificate to the acquirer, the company will cancel the certificates issued to the transferor or previous owner.

Liens over Shares

Taxes and charges arising from the issuance, negotiation and capitalization of shares will be assumed and paid by the respective shareholders.

Rules of Shares

Matters not regulated in the Bylaws regarding the issuance, subscription, payment, negotiation, right of first refusal of shareholders to acquire new shares in proportion to the number of shares they own at the time of issue or respective disposition, as well as other aspects inherent to the shares of the Company will be regulated by the Board of Directors.

T. Differences and Conflicts of Interest

Any transaction controversies that occur among shareholders or between shareholders and the Company, due to the corporate contract, will be submitted to arbitration, if the parties fail to reach a direct settlement within fifteen (15) calendar days of declaring the controversy.

The parties may designate, by mutual agreement, one (1) arbitrator from List A of the Arbitration and Conciliation Center of the Bogota Chamber of Commerce. If after fifteen (15) calendar days no agreement is reached on this appointment, the arbitrator will be appointed by the Arbitration and Conciliation Center of the Bogota Chamber of Commerce from the same list by draw.

Conflicts of interest will be subject to the provisions of current regulations.

The arbitrator will decide according to law and will be authorized to reconcile the opposing claims. A party is understood as the shareholder or shareholders who support the same claim.

In matters not provided for in this section, the provisions of the Code of Commerce and the current Corporate Bylaws will be applied.

ANNEX 2

RULES OF THE BOARD OF DIRECTORS

A. Purpose

These Rules regulate the internal activity of the Board of Directors of FINDETER in accordance with the provisions established by law, the Corporate Bylaws and other applicable regulations.

B. Composition

The Board of Directors shall consist of five (5) principal members and five (5) personal alternates, each elected by the General Shareholders' Meeting for two (2) year periods. At least three (3) members must be independent members. Either an individual or a specific position may be appointed as Board member. Board members must not find themselves in any of the situations established as inabilities and incompatibilities for this collective body as per the applicable general and special rules.

The FINDETER CEO will attend the meetings with voice but without vote. Either an individual or a specific position may be appointed as Board member

C. Chairman of the Board of Directors

The Board of Directors will be chaired by an official linked to the Ministry of Finance and Public Credit, who will be appointed by the Board of Directors in the respective session.

The duties of the Chairman of the Board of Directors are the following:

a) Leading the operation of the Board and ensuring the proper and effective performance of its functions.

b) Participating in the preparation of the meetings' Agenda and in the calls to the meetings, directly or through the Secretary of the Board of Directors, in coordination with the CEO and the other Board members.

c) Opening and adjourning the Board meetings.

d) Chairing the meetings and moderating the debates, ensuring that all Board members focus their attention on the development of the meeting and actively participate.

e) Monitoring, with the support of the Secretary, the attendance, punctuality and permanence of the members of the board in the meetings.

f) Ensuring the adequate and timely delivery of the information to the board members, directly or through the Secretary.

g) Submitting the decisions to be adopted to a vote.

h) Authorizing with his signature the minutes approved by the Board of Directors.

i) Ensuring the execution of the Board's resolutions and monitoring its assignments and decisions.

j) Forming the subcommittees that are required for the full performance of the Board's duties.

k) Acting as spokesperson for the Board of Directors.

l) Ensuring compliance with this Code and answer any questions that may arise regarding its application.

m) Coordinating and planning the operation of the Board of Directors, in coordination with Management, by establishing an annual work plan based on the assigned duties that is reflected in a reasonable number and duration of board sessions

n) Encouraging the Board of Directors to set and efficiently implement the company's strategic management.

o) Striving to keep the company's internal policies, regulations, and strategic plan up to date.

p) Coordinating, together with Management, and supported by the Corporate Governance Committee, the annual evaluation process of the Board of Directors and the Committees.

q) Evaluating, together with Management, any cases that require an extraordinary Board meeting, as well as any sessions that may be carried out virtually.

r) Staying informed of relevant changes in the company's regulatory and competitive market environment.

s) Performing other duties established by law and the corporate bylaws.

D. Secretary of the Board of Directors

The General Secretary of FINDETER will act as Secretary of the Board of Directors and will exercise the following functions:

a) Communicating the calls to ordinary or extraordinary meetings.

b) Sending the necessary documentation for the correct development of the sessions to all Board members.

c) Verifying the quorum at the beginning and during each session, as required.

d) Drawing the minutes of the sessions and submit them to the Board's approval.

e) Endorsing with his signature the minutes approved by the Board of Directors.

f) Keep the minutes books of the Board of Directors.

g) Communicating to the competent authorities the decisions of the Board of Directors and monitoring the actions that lead to their full execution.

h) Being the document custodian for the Board of Directors.

i) Issuing the required evidence regarding the actions in the sessions Board of Directors.

j) Fulfill other duties assigned by the Board of Directors.

In case of absence, an ad hoc Secretary of the Board of Directors will be appointed.

E. Special Guests

The Board of Directors may occasionally or permanently invite, when deemed convenient for the full performance of its duties, the Independent Auditor, any Company employee and other authorities and even individuals, in order to address specific issues. They will have voice in the Board's deliberations, but no voting right.

F. Profiles of Board Members

Board members must undertake to fulfill the vision of FINDETER and must meet at least the following requirements:

1. As a whole, as a collegial body, the Board of Directors must have the following profiles

in terms of knowledge and experience:

a. Knowledge or experience in the activities specific to Findeter's corporate purpose.

b. Knowledge and experience in the business sector.

c. Knowledge and experience in finance, internal control, and risk management.

d. Knowledge and experience in the financial system.

e. Knowledge and experience in new technologies.

f. Knowledge and experience in sustainable development.

g. None of the members considered individually must meet all the requirements set forth in this section, as this is a comprehensive profile of the Board of Directors.

2. At least one (1) of the members of the Board of Directors must meet the qualifications of a financial expert. A member of the Board of Directors who has economic, accounting and financial knowledge, with at least three (3) years of experience as a member of financial, audit, investment, business, credit or risk committees of financial entities, or three (3) years of experience as a professor in economic or financial matters, or who has three (3) years of experience in executive or management positions with responsibility in economic and financial matters, at the private or governmental level, will be considered a financial expert.

The composition of the Board of Directors must take into account gender, diversity, and inclusion criteria. Gender, diversity, and inclusion criteria will, in all cases, be consistent with the provisions of these regulations regarding the profiles of Board members.

The profiles of the Board members will be reviewed and updated by the Board of Directors or the Corporate Governance Committee.

Additionally, Board members must meet the objective and subjective requirements for this type of position, as required by the Colombian Financial Superintendency.

G. Principles and Duties that Govern the Actions of Board Members

Board members must act in observance of government policies and the interest of FINDETER. They must also commit to the Corporate Governance Code. The duties of the Board members are:

a) Diligence and care

b) Loyalty

c) Non-competition

d) Secrecy

e) Non-use of corporate assets

H. Rights of Board Members

The rights of Board members include:

a) Information

b) Have the support of experts

c) Induction and permanent training

d) Remuneration for attending their meetings

I. Independence of Board Members

A Board Member shall be considered independent when they meet the criteria set forth in the second paragraph of Article 44 of Law 964 of 2005, or any provision regulating, modifying, replacing, or supplementing them. Additionally, a Board Member shall not be considered independent if:

a) The Board Member is an employee or director of Findeter or one of its subsidiaries (entities in the sector).

b) The Board Member is a shareholder who, directly or through an agreement, controls the majority of Findeter's voting rights.

c) The Board Member is a shareholder or employee of associations or companies that provide advisory or consulting services to Findeter.

d) The Board Member is an employee or director of a foundation, association, or company that receives significant donations from Findeter.

e) The Board Member is an administrator of an entity on whose board of directors a legal representative of Findeter serves.

f) The Board Member is a person who receives compensation from Findeter other than their fees as a member of the Board of Directors.

g) The Board Member is a public official in the same sector as Finance and Public Credit or linked to any of the following sectors: Housing, City and Territory, National Education, Health and Social Protection, Interior and Justice, Information and Communications Technology, Sports and Transportation, or any other sector that, in the judgment of the nominator or the Colombian Financial Superintendency, may compromise their independence.

Members of the Board of Directors who are elected as independent shall undertake in writing, upon accepting the position, to maintain their independent status during the exercise of their functions and, in the event that such status is lost, they shall notify the Secretary General of this situation in writing. Once this notification has been delivered, the Company's management shall have a period of thirty (30) calendar days to convene the General Shareholders' Meeting to resolve on the continuity of the member of the Board of Directors as a related member, or to appoint a new independent member.

J. Employee Representative

Pursuant to the provisions of Decree 1962 of November 15, 2023, the Board of Directors will have a section represented by one of Findeter's employees linked through any contractual, legal, or regulatory instrument and will include both private and public employees. Employees serving on the Board of Directors will be exempt from complying with the provisions of the first paragraph of section 3 of Article 73 of Legislative Decree 663 of 1993.

K. Term and succession of the members of the Board of Directors

The Board of Directors' terms will be staggered to preserve Findeter's knowledge and strategic continuity.

The members of the Board of Directors will have a term of two (2) years and may be re-elected for up to two (2) consecutive terms. An independent member will cease to be considered as such after two (2) consecutive terms on the Board of Directors.

In the event that a member must be replaced before the end of the term for which they were elected, their replacement will be elected for a term equal to the remaining term of the replaced member's original term.

Based on Findeter's interests and goals, the Board of Directors and the General Shareholders' Meeting will promote the continuous functioning of the governing and administrative bodies. To this end, before the regular elections of the Board members, the General Shareholders' Meeting must be informed of the profiles and requirements established for membership in the governing body, as well as the results of the evaluations conducted on current members.

Once the shareholders have submitted the slates they will propose at the meeting for the election of the members of the Board of Directors, the Secretary General must evaluate the candidates' profiles and issue a certification of compliance with the requirements, based on the private information provided to him and the information available in public databases.

When the resignation, vacancy, or loss of independence of one of the members of the Board of Directors affects the quorum or the minimum number of independent members, a special session of the General Shareholders' Meeting must be convened within forty-five (45) days following the meeting to select a candidate to replace the outgoing member until the end of the term for which he was initially elected

L. Taking Office

FINDETER Board members will take office before the Financial Superintendence of Colombia, except for the employee representative, who by express legal provision is exempt from complying with this requirement.

Once the Board members takes office, upon approval, for the first time before the Financial Superintendence of Colombia, the following information will be sent to them: Act 57 of 1989 (creation law), Decree 4167 of 2011 (amendment to the legal nature), Organic Statute of the EOSF Financial System (articles 268 et seq.), as amended or complemented, the Corporate Bylaws and the FINDETER Corporate Governance Code.

M. Duties of the Board of Directors

In addition to the provisions of article 41 of the Corporate Bylaws, the following are duties of the Board of Directors:

a) Carrying out efforts leading to the proper development of the corporate purpose.

b) Ensuring strict compliance with the Law and the Corporate Bylaws.

c) Formulating the Company’s general policy, the administrative development plan and the plans and programs that, in accordance with the Organic Law of the National

Development Plan, and if applicable, the Organic Budget Law, must be proposed for its incorporation into the sectoral plans and, through these, into the National Development Plan.

d) Ensuring that the Independent Auditor can properly performance his duties.

e) Storing and protecting the Company's commercial and industrial reserve.

f) Refraining from improperly using privileged information.

g) Giving fair treatment to all partners and respecting the exercise of their right of inspection.

h) Refraining from participating individually or through an intermediary for personal interest or of third parties, in activities that involve competition with the company or in acts with respect to which there is a conflict of interest

i) Strictly complying with the formal requirements and the regulations related to the development of the sessions of the General Shareholders' Meeting and the participation of shareholders, in order to have the best relationship with them.

j) Complying with and enforcing the decisions of the General Shareholders' Meeting.

k) Establishing the budget caps for when the CEO is authorized to enter into contracts.

l) Calling ordinary sessions of the General Shareholders' Meeting when the legal representative fails to do so on time and extraordinary sessions when deemed necessary.

m) Carry out specialized audits on specific topics, when deemed necessary.

n) Actively participate in the Entity's strategic planning and monitoring, determining the needs for strategic redirection when required.

o) To be aware of the Annual Corporate Governance Report by the Corporate Governance Committee.

p) Approving and defining the Related Party Transaction Policy.

q) Approving and defining the Information Disclosure Policy.

r) Review the reports periodically submitted by Board members, Legal Representatives, members of Senior Management and other Company Managers

about their relationships, either direct or indirect, among themselves, or with other entities, or with suppliers, or with customers or with any other Stakeholders, from which situations of conflict of interest or influence could arise with respect to their opinion or vote, thus building a "Map of Related Parties" of Managers.

s) Annually evaluate the effectiveness of its job as a collective body and its Committees, as well as the reasonableness of its internal rules, proposing, where appropriate, changes to its organization and operation.

t) Submitting to the General Shareholders' Meeting or associates at year-end, a report on the work carried out by the Audit Committee.

u) Others that are specific to it and that are not attributed to any other governing body and those that correspond to it by law, given the legal nature of FINDETER.

The duties in relation to the Internal Control System (ICS) are the following:

a) Defining and approving the general strategies and policies related to the ICS, based on the recommendations of the Audit Committee.

b) Establishing formal evaluation mechanisms for management and, if deemed necessary, establishing compensation and remuneration systems tied to the fulfillment of long-term objectives and risk levels.

c) Defining clear lines of responsibility and accountability throughout the organization.

d) Analyzing the existing risk management process and adopt the necessary measures to strengthen, as required, which includes, among others, establishing crisis protocols that include contingency plans.

e) Adopting the necessary measures to ensure the independence of the internal auditor and monitor his compliance.

f) Reviewing the relevant reports regarding the ICS that are presented by the different control or supervisory agencies and issue the necessary orders so that the appropriate recommendations and corrections are adopted.

g) Requesting and studying in due time all the relevant information required to have sufficient illustration to responsibly adopt the corresponding decisions and request expert advice, when necessary.

h) Requesting any clarifications and formulating the objections that it considers pertinent with respect to issues that are submitted for its consideration.

i) Approving sufficient resources for the ICS to meet its objectives.

j) Evaluating the relevant recommendations on the ICS made by the Audit Committee and other internal and external governing bodies, adopting the pertinent measures and monitoring their compliance.

Functions regarding the control environment

a) Approve the following documents and policies:

• Code of Ethics and Conduct.

• Policy for generating and submitting reports on the ICS.

• Human Resources Policy.

• Financial and Accounting Policy.

• Evaluation and Self-Evaluation Policy.

• Induction and Training Policy for Members of the Board of Directors and its Supporting Committees.

• Internal Regulations of the Supporting Committees.

• Information Security Policy.

• Internal Audit Charter.

• Annual Budget.

• Strategic Plan.

• Strategic Technology Plan.

• Information and Communication Policy.

b) Appoint the Entity's internal auditor, without prejudice to the provisions applicable to the appointment of the internal auditor for public entities.

Risk Management Functions

a) Monitor the actions taken by Senior Management to mitigate the risks associated with the activities outlined in strategic planning.

b) Monitor the operation of the Internal Control System to mitigate the risks associated with achieving the Entity's strategic objectives.

Duties Regarding Control Activities

a) Monitor the Entity's financial and operational performance.

b) Review the financial statements and their notes before they are presented to the General Shareholders' Meeting, taking into account the reports and recommendations submitted by the Audit Committee.

c) Ensure that Senior Management establishes processes that allow for the identification and evaluation of changes that may have a significant impact on the Internal Control System.

d) Meet with the Statutory Auditor and the internal auditor. Likewise, the Committee may meet without the presence of Senior Management when deemed necessary.

Duties Regarding Information and Communication

a) Request all information deemed necessary regarding the development and performance of internal controls to fulfill its responsibilities.

b) Present a report on the operation and evaluation of the Internal Control System during the immediately preceding period at the regular session of the General Shareholders' Meeting.

Duties Regarding Follow-up and Monitoring Activities

a) Self-assess their management at least once a year and analyze the results of their management self-assessment and the President's evaluation.

b) Define actions to address the findings resulting from self-assessments and internal and external evaluations.

c) Monitor risk management and the measures adopted for control or mitigation

every six months, or more frequently if appropriate.

Regarding the Market Risk Management System (SARM), which allows FINDETER to effectively identify, measure, manage and control such risks, it is up to the Board of Directors to determine the set of policies, procedures, methodologies of measurement and special internal monitoring and control mechanisms, which should allow the adoption of timely decisions for the adequate mitigation of market risks. Additionally, when applicable, the SARM should allow the determination of the appropriate amount of capital that corresponds to the levels of risk assumed.

The procedures adopted must consider that the Board of Directors is responsible for adopting the following decisions regarding the adequate management of market risks:

a) Approving the Company's policies on market risk management, which must reflect the general level of tolerance or exposure to such risks. These policies must be consistent with the corporate strategy and strategic objectives, as well as the financial and operating structure, and be made in writing.

b) Approving the procedures designed by the Company's management to manage market risks.

c) Designating, within the Company's organizational structure, the position and area responsible for market risk management, indicating the corresponding duties and responsibilities.

d) Ensure the allocation of physical, human and technological resources for the adequate development of the SARM.

e) Requesting management to submit periodic reports on the levels of exposure to market risks, their implications and the relevant mitigation and/or management activities.

f) Adopt special procedures for the control of SARM.

Regarding the Credit Risk Management System (SARC), which allows FINDETER to effectively identify, measure, manage and control such risks, it is up to the Board of Directors to determine the set of policies, procedures, methodologies of measurement and special internal monitoring and control mechanisms, which should allow the adoption of timely decisions for the adequate mitigation of credit risks. In this sense, the Board of Directors will be in charge of dictating policies and setting financial limits for authorized direct credit transactions, based on the

provisions of the SARC.

N. Inabilities and Incompatibilities

Board members will be subject to the inabilities and incompatibilities indicated in the Political Constitution, the legal and regulatory provisions such as those contained in the Code of Administrative and Contentious Administrative Procedures, in Decree 128 of 1976 and in the rules on conflicts of interest of FINDETER.

O. Meetings and Calls

The Board of Directors will ordinarily meet at least once a month, on the day and time it determines, and may meet extraordinarily when requested by one of its members, the CEO or the General Secretary of FINDETER or the Independent Auditor.

The call for meetings, both regular and extraordinary, will be made by written notice sent to each member at least five (5) calendar days in advance. This notice may be sent through any suitable means, physical or virtual, such as a letter or email.

The deliberations of the Board of Directors may be suspended and then resumed as many times as the majority of the members present at the meeting so decide.

The President of FINDETER will attend the meetings of the Board of Directors, with the right to speak but without the right to vote.

Notwithstanding the foregoing, the Board of Directors may also hold non-face-to-face or mixed meetings or make decisions by written vote, in accordance with the rules and mechanisms established in Law 222 of 1995 and other concordant regulations or those that modify, supplement, or replace it. Likewise, the Board of Directors may hold universal meetings when all members of the Board of Directors are present and voluntarily decide to declare the meeting adjourned.

Meetings, both ordinary and extraordinary, shall be convened by any suitable means, with a minimum of five (5) calendar days' notice by the President or the Secretary General of Findeter.

P. Agenda and Information

The meeting's agenda will be organized by the Secretary of the Board of Directors, defined together with its Chairman. They will ensure that the meeting's agenda is structured following parameters established by law and internal regulations, including among the items verifying the required quorum and the approval of the agenda, giving

a logical order of presentation of topics and debates.

However, the Board of Directors has the power to address additional issues, when so decided by the majority of its members, after the agenda for the respective meeting has been entirely discussed. Board members may request that other issues be included in the agenda, presenting the respective request to the Chairman of the Board of Directors for inclusion in the next meeting or its scheduling for a subsequent meeting.

Board members will have access in advance to the information that is relevant for decision-making, in accordance with the previously submitted agenda. For this purpose, the information will be sent or made available to the members five (5) calendar days in advance through any suitable means such as e-mail, magnetic storage or printed. However, and prior to the meeting, Board members may request additional information through the General Secretary.

Once the quorum has been verified and the agenda has been approved, the members of the Board of Directors will be asked if they consider themselves to have any current or potential conflicts of interest, or any inability or incompatibility regarding the topics to be discussed. If any member of the Board of Directors expresses that they internally consider themselves to have a conflict of interest or any inability or incompatibility regarding any of the items, the Board of Directors will evaluate the situation and, if deemed appropriate, will request the conflicted member to withdraw from the discussion of the respective item.

The information sent to the Board of Directors will include at least the following documents that will be part of the agendas:

Monthly: Detailed presentation of financial, risk, commercial and technical results.

Bimonthly: Reports from the Office of Internal Management Control

Quarterly: Commercial and technical reports, as well as the presentation by the Compliance Officer and the Statutory Auditor of the SARLAFT report.

Semiannually: Review of FINDETER'S Strategic Plan. SARO report.

Annually: Approval of the Budget; Result of the evaluation of the CEO and its Management Team.

Q. Quorum and Majorities

The Board of Directors will validly deliberate and decide with the presence and votes

of the majority of its members, with the exceptions provided by law.

If the Board of Directors cannot meet due to lack of quorum, the Secretary must record the situation and the meeting will be automatically moved to the next business day, at the same time and place.

R. Voting Method

The votes will be public.

S. Initiatives

Board members and the CEO of FINDETER may submit proposals to the Board of Directors.

T. Minutes

The decisions of the Board of Directors will be recorded in minutes that, once approved, will be authorized with the signatures of its Chairman and the Secretary. They will record the place, date and time of the meeting, the name of the attendees, all the issues discussed and the decisions adopted, denied or postponed. Additionally, they must identify the studies, reasons and other sources of information that served as basis for decision-making, as well as the reasons for and against that were discussed.

The minutes book of the Board of Directors will be kept by the General Secretary of the Company.

U. External Advisors

Board members may hire, at the Company's expense, external advisers of recognized experience and professional solvency for the service of the Board of Directors, independent of those hired by management, when considered necessary for the better performance of their duties. In any case, their hiring shall be subject to the internal procedures established.

V. Conflict of Interest

The conflicts of interest involving members of the Board of Directors will be managed in accordance with the provisions of the Findeter Code of Ethics and Integrity.

W. Remuneration

The fees of the members of the Board of Directors will be set by the General Shareholders' Meeting, when this function is not the responsibility of the Ministry of Finance and Public Credit in accordance with current laws, and will be paid by Findeter for attendance at meetings of the Board of Directors and Committees.

X. Evaluation

Board members will be evaluated individually in accordance with the process determined by the Corporate Governance Committee and their results will be presented as a collective body in the Company's Annual Management Report.

The annual evaluation of the Board of Directors will be carried out with a view to improving the performance of the Board as a whole, of its members individually and of its supporting committees. The evaluation methodology is based on the following models: i) self-evaluation, ii) peer assessment, or iii) evaluation with external facilitators, in order to establish the levels of efficiency and effectiveness in the fulfillment of duties and functions, the achievement of the group's objectives, its members observance of the principles and responsibilities indicated for them in this Code and to identify improvement measures.

The evaluation of the Board of Directors must take into account the criteria established by the Colombian Financial Superintendency through the External Guide for the Evaluation of Boards of Directors (E-GU-MIS-017), as well as the principles of the Basel Committee on Banking Supervision and the recommendations of the Country Code.

For the self-evaluation and peer evaluation process of the members of the Board of Directors, the criteria of availability to address Board matters, attendance at meetings, knowledge of the sector, the business, and the company, and, only where applicable, independence, will be taken into account. Additionally, members must evaluate the quality of their interaction with Senior Management, and the structure and operation of the Board of Directors.

The evaluation of the President and Secretary of the Board of Directors must also consider the timely delivery of information for the conduct of meetings, the definition of the meeting agenda, and the application of corporate governance best practices.

Regarding the evaluation of the Board of Directors and the Committees as collegial bodies, the criteria of experience, alignment of the bodies with Findeter's strategy, and independence from Management must be met.

Evaluations conducted by external facilitators must also consider the criteria of the

Board of Directors' performance, risk management, attention to the requirements of authorities and supervisory bodies, environment, and regulatory compliance.

The evaluation methodology may be defined by the Board of Directors with the support of the Corporate Governance Committee and external consultants, but must in all cases consider the criteria established here and the performance evaluation of Findeter's President

ANNEX 3

GLOSSARY

To facilitate the understanding of the Corporate Governance Code and its Annexes, the meaning of words and expressions used in its content is set out below.

Responsible Action: It is our way of acting, it is to understand the needs of the territories through dialogue and collaboration to offer relevant, differentiated and high-impact projects, acting with integrity, building trust and complying with the commitments to our stakeholders, meeting their needs and expectations.

Manage: To govern, exercise authority or command over the Company and the people who work here. Lead the institution to obtain, order, arrange and organize the adequate use of human talent and the physical, financial, technological and legal resources required and available.

Self-control: The ability of all workers in the organization, regardless of their hierarchical level, to evaluate and control their work, detect deviations and carry out corrections in the exercise and fulfillment of their duties, as well as to improve their tasks and responsibilities.

Self-management: It points to the organization's ability to interpret, coordinate, execute and evaluate its operation effectively and efficiently.

Self-regulation: The Company's ability to apply through participation the methods and procedures established in accordance with the regulations, allowing for the adequate development, maintenance and projection in compliance with the Company's Mission in an environment of integrity, efficiency and transparency when engaging its customers and stakeholders.

Climate Change: A climate change attributed directly or indirectly to human activity that alters the composition of the global atmosphere and that adds to the natural variability of the climate observed during comparable periods of time.

Corporate Governance Code: It comprises the voluntary self-regulation provisions of FINDETER'S management and governing bodies, by means of which they undertake to ensure effective, integrated and transparent management. The Code includes the rules of conduct and the mechanisms and instruments that must be adopted and with which it seeks to build trust among internal and external customers. Its content addresses the analysis and consensus of Senior Management.

Sustainable Purchases: Purchases for which environmental and social criteria, in addition to economic considerations, are adopted as a condition for the purchases and procurement of goods and services.

Market Conditions: Current variables determined by supply and demand for the goods and services subject to the transaction, taking into account symmetry in the information and fairness of opportunity.

Conflict of Interest: Any situation or event in which the direct or indirect personal interests of employees contradict those of the Company, interfere with the Company's duties or lead them to perform based on motivations other than to proceed correctly or to fulfill their responsibilities.

Human Rights: Rights inherent to all human beings regardless of race, sex, nationality, ethnic origin, language, religion, or any other status.

Administrative Development: Set of policies, strategies, methodologies, techniques and mechanisms of an administrative and organizational nature for the management and handling of the Company's human, technical, material, physical and financial resources, aimed at strengthening the administrative capacity and institutional performance, in accordance with the applicable regulations issued by the National Government.

Sustainable Development: The type of development that occurs in a country that can maintain or sustain the balance between social, environmental and economic aspects.

Strategic Management: Set of actions that guide the Entity towards the future, through which efforts are focused on common purposes to satisfy the needs and expectations of customers and the national government.

Differential Approach: Identifies the characteristics that people share in order to

enhance differential actions that materialize the effective use of their rights.

Gender equality: Impartial treatment of men and women according to their respective needs, either with equal treatment or different treatment considered equivalent in terms of rights, benefits, obligations and possibilities.

FINDETER: Financiera de Desarrollo Territorial S.A. Also referred to herein as "the Entity" or "the Company".

Manage: Carry out planned, consistent and coherent diligences, leading to the effective achievement of objectives, through the systematic application of planning, executing, verifying and acting with opportunity, as support for decision-making based on specific events.

Governance: A set of conditions that make it possible for the Company's management and governing bodies to exercise the real power that has been formally given to them for the fulfillment of the objectives and duties as part of the responsibility of their positions. It includes the recognition of: a) Their competence and suitability to manage the Company in achieving the Mission and strategic objectives (efficiency); b) Compliance with ethical principles and values and prioritization of the general interest over personal benefits (integrity); and c) Communication to make clear how the results obtained are managed and reported (transparency).

Corporate Governance: How the Entity is managed, seeking to improve its internal and external operation, with efficiency, transparency and integrity, to be adequately accountable to its stakeholders, ensuring ethical organizational behavior.

Stakeholders: People or organizations that can affect, be affected or perceive themselves as affected by a decision, objective or activity of the company.

Social Inclusion: Provide a dignified, respectful, safe and healthy work environment. Recognizing the diversity and difference between human beings and providing equal opportunities.

Investors: In addition to the people who acquire the securities issued by FINDETER expecting a return in exchange, any individuals or companies that acquire FINDETER shares, as of the issuance of Decree 4167 of November 3, 2011.

Mission: Definition of the tasks or rationale behind FINDETER. It is determined in its governing rules and is in accordance with its characteristics.

Internal Control Standard Model (MECI): Model established by the State for its

Entities through Decree No. 1599 of 2005. It provides a structure for strategy, management and evaluation control, for the purpose of improving institutional performance by strengthening the control and evaluation processes that the Office of Internal Control of Management must carry out in FINDETER.

Compliance Officer: Pursuant to the regulations issued by the Financial Superintendence of Colombia, FINDETER has a Compliance Officer, who is in charge of verifying compliance with regulations related to the Money Laundering and Terrorism Financing Risk Management System (SARLAFT) issued by the supervisory agencies, and that the procedures established by the Company are followed as a preventive measure.

Strategic Objectives: The framework objectives projected by the Company's Senior Management for the medium and long term, allowing it to fulfill its Mission and achieve its Vision. These must be measurable and have a time horizon. The development of strategic objectives will have a direct impact on adding value to mission processes.

Policies: The guidelines with which Management defines the Company's scope of action, for the fulfillment of the constitutional and mission purposes, to ensure consistency between its practices and its purposes.

Ethical Principles: Standards of conduct and basic beliefs that guide the actions of FINDETER employees in their internal relationships and with the Company's management. They are not negotiable.

Accountability: FINDETER'S legal and ethical duty to be accountable for the administration, management and performance of funds, goods and/or public resources allocated, and the respective results, in compliance with the order that has been conferred upon it. It constitutes a means of transparency and responsibility that allows building trust and fighting corruption.

Social Responsibility: A company is socially responsible when it integrates social and environmental issues in its business operations and in its interactions with its stakeholders voluntarily.

Disclosure of Information: The Company's duty to have clear rules and an adequate structure for the provision of accurate and timely information to its stakeholders. Disclosure increases transparency regarding the Company's operation, promotes informed decision-making and allows the appropriate exercise of the respective stakeholders.

Risks: Likelihood of both internal and external events, which may affect or hinder the achievement of the Company's institutional objectives, thus obstructing the normal development of the business.

SAR: Refers to the Risk Management Systems that are managed within the Company as SARO, SARLAFT, Information Security and Cybersecurity, Business Continuity, SARAS, SARM, SARL, SARC, Anti-Fraud and Anti-Corruption and Suppliers.

Internal Control System (ICS): ICS is understood as the set of policies, principles, standards, procedures and mechanisms for verification and evaluation, established by the Board of Directors, senior management and other workers of an organization to provide a reasonable degree of security regarding the achievement of the following objectives:

a) Improve the efficiency and effectiveness of the Company's operations. Effectiveness here is understood as the ability to achieve the proposed goals and/or results; and efficiency as the capacity to produce the maximum results with the minimum of resources, energy and time.

b) Prevent and mitigate the occurrence of fraud originating both inside and outside the Company.

c) Carry out adequate risk management.

d) Increase the reliability and timeliness of the Information generated by the Company.

e) Enforce adequate compliance with the standards and regulations applicable to the Company.

The ICS is of vital importance to the extent that efficiency is promoted, effectiveness is ensured, and the generally accepted standards and principles are prevented from being violated.

SARO: The Operational Risk Management System, which consists of policies, procedures, documentation, organizational structure, registry of operational risk events, supervisory agencies, technological platform, information disclosure and training, through which the Company seeks to obtain an effective management of this type of risk.

SARLAFT: The Money Laundering and Terrorism Financing Risk Management System, (SARLAFT, formerly SIPLA), which consists of policies, methodologies, procedures, documentation, organizational structure, supervisory agencies, technological platform,

information disclosure and training, that prevent the use of the Company as an instrument for money laundering and/or channeling resources for terrorist activities.

SARAS: The Social and Environmental Risk Analysis System applied to investment projects for on-loans. It includes the policies, procedures, documentation, organizational structure and other supports that prevent the Company from financing activities that are harmful to the environment or society.

Worker: Includes the personnel directly hired by the Company, temporary workers and all those who carry out activities within the Company, regardless of their employment relationship with the Company.

Transparency: It is considered as a clear and transparent way of acting, transmitting assurance and credibility to others, and subordinates the Company's management to the rules that have been agreed upon, exposing it to the direct observation of stakeholders. It also involves an accountability duty.

Values: The attributes or qualities that regulate the way of thinking, being and acting of workers in developing their tasks in the Company. They allow the ethical principles to be put into practice and make possible the construction of a rewarding work coexistence.

Vision: It establishes the Company's "ought to be" in a time horizon, develops its mission and includes the governance plan of its manager, which is then translated into the Company's development plan