

**REPORT OF IMPLEMENTATION OF THE BEST CORPORATE
PRACTICES**

FINANCIERA DE DESARROLLO TERRITORIAL S.A. -FINDETER

LEGAL REPRESENTATIVE: IVAN ALIRIO RAMIREZ RUSINQUE

**APPOINTED LEGAL REPRESENTATIVE FOR SENDING THE REPORT
OF
IMPLEMENTATION JOSE ALBERTO LAURENS**

REPORT PERIOD: 2025

COLOMBIAN FINANCIAL SUPERINTENDENCE

INTRODUCTION

The implementation of the recommendations of the new Code of Best Corporate Practices of Colombia must be reported by the issuers to the Financial Superintendence of Colombia (SFC) through this Best Corporate Practices Implementation Report.

The objective of this report is to inform the stock market about the implementation or not of the recommendations of the Code by each issuer. For this purpose, in front of each recommendation there are three boxes corresponding to YES, NO and N.A., as well as a space to complement your answer as follows:

If the answer is “Yes”, the issuer must briefly describe the way it has made such implementation. If the answer is “No”, the issuer must explain why it has not implemented such recommendation.

The “N.A.” answer only applies due to legal reasons. In this case, the issuer is required to indicate precisely the rule that prevents its implementation.

Since some recommendations involve specific aspects, it is important to note that they shall be deemed implemented only upon compliance of all of those aspects, unless there is a legal reason for not adopting some of them, which should be indicated.

Each recommendation has a box to indicate the implementation date. In addition, there is a box to fill in the modifications.

Finally, when by its nature the issuer does not have the specific body to which the recommendation refers, it will be understood that it refers to the body that within the entity is equivalent or takes its place.

COLOMBIAN FINANCIAL SUPERINTENDENCE

I. RIGHTS AND EQUAL TREATMENT OF SHAREHOLDERS

Action No.1: Principle of equal treatment

- 1.1. **The Company provides equal treatment** to all shareholders within the same class of shares. Their akin conditions do not provide access to other shareholders' privileged information.

1.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: Article 11 of the Corporate Bylaws in force (EP No. 0846 of April 22 of 2024): Shareholders' and Investors' rights.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	17/06/2022					
Dates of Modification	17/06/2022					

- 1.2. **The Board of Directors has approved a specific procedure** that defines the practices of relation between the company and shareholders of different conditions, in matters such as access to information, response to requests of information, communication channels, interaction between the shareholders and the entity, its Board of Directors and other Managers.

1.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description This information is in the Chapter III (A) (1) of the Good Governance Code, which is published on Finder's website, via the following link: https://www.findeter.gov.co/relacion-con-inversionistas						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						

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Date of Implementation	30/11/2012
Dates of Modification	12/12/2019

Action No. 2: Information about shares

2.1. Through its website, **the company discloses to the public** with clarity, accuracy and integrity **the different classes of shares issued**, the number of shares issued for each class, and the number of shares held in reserve, as well as the rights and obligations attached to each class of shares.

2.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description:						
This information can be found in the Bylaws (link https://www.findeter.gov.co/relacion-con-inversionistas) and on the website subsection "Shareholding Composition" (link: https://www.findeter.gov.co/about-Finder)						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	01/01/1998					
Dates of Modification	15/01/2019					

Action No. 3: No stock dilution

3.1. In **operations that may result in the dilution** of the minority shareholders' stock (e.g. a capital increase with waiver of the preemptive right, a merger, division, or segregation, among others), **the company explains them in detail to the shareholders** in a report prior to the Board of Directors meeting. It shall include the opinion as to the transaction terms of an independent external adviser with recognized solvency (*fairness opinion*), appointed by the Board of Directors. These reports are made available to shareholders prior to the Meeting pursuant to the terms for exercising the right to inspection.

3.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description						
It is included in the Good Governance Code, Chapter III GOOD GOVERNANCE POLICIES FOR COMPANY MANAGEMENT, literal A., FINETER DIRECTION POLICIES, section 1.3, Additional measures for the protection of Shareholder.						
NO. Explain:						

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N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	12/15/2015
Dates of Modification	12/12/2019

Action No. 4: Information and Communication with the Shareholders:

4.1. The company has a corporate website, in Spanish and English. A link to Corporate Governance or shareholders and investors relations or equivalent is available, which includes financial and non-financial information in accordance with the recommendations 32.3 and 33.3. In no case it may include any confidential information concerning the company or trade secrets, or information whose disclosure may be used to the detriment of the company.

4.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description						
It is available on Findeter's website in the Investor Relations section (both in English and Spanish) via the following links: https://www.findeter.gov.co/relaci%C3%B3n-con-inversionistas and https://www.findeter.gov.co/Home%20Investor%20Relations						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	01/01/1998					
Dates of Modification	01/01/2015					

4.2. The company has mechanisms for permanent access and use addressed exclusively to shareholders. They include a link on the website with exclusive access to shareholders, or an office for shareholders and investors' service or relations, regular briefings, among others, so that shareholders can express their opinions or raise concerns or suggestions about the company's development or about their role as shareholders.

4.2 Action implemented	YES	☒	NO	☐	N.A.	☐
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YES. Please provide a brief description

Findeter's General Secretariat is the formal contact channel with shareholders. This function is assigned by the Entity's Bylaws. On the other hand, the investor relations office attends directly Findeter's investors. On the website all the information addressed to investors and shareholders is published.

NO. Explain:

N.A. Please specify the rules preventing adoption of this recommendation:

Date of Implementation	14/05/1990
Dates of Modification	23/06/2015

4.3. The company organizes events to present the quarterly results, addressed to its **shareholders and market analysts**. They may be in person or by means of distance communication (conference, video conferencing, etc.).

4.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description:						
The measure has been implemented since June 2015, and was introduced in the Code of Good Governance in Chapter III GOOD GOVERNANCE POLICIES, literal C MANAGEMENT POLICIES, numeral 9 INFORMATION SECURITY AND CYBERSECURITY POLICIES, numeral 9.1 INFORMATION DISCLOSURE POLICY and numeral 11, sub-numeral 11.3 POLICIES FOR RELATIONSHIPS WITH INTEREST GROUPS. Through the IR Recognition of the BVC we have as a measure to carry out these quarterly events, these can be consulted on our website in the Investor Relations section. https://www.findeter.gov.co/relaci%C3%B3n-con-inversionistas						
NO. Explain:						
Date of Implementation		11/06/2015				
Dates of Modification		12/12/2019				

4.4. The company organizes or participates in presentations, events or forums about fixed income, mainly for **investors in debt instruments and market analysts**, in which business indicators of the issuer, its liabilities management, financial policy, ratings, issuer's performance with respect to covenants, etc. are updated.

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4.4 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description:						
This applies when the Entity issues certificate deposits (CDs) and/or bonds in the market.						
NO. Explain:						
N.A Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	23/06/2015					
Dates of Modification	23/06/2015					

4.5. The Corporate Bylaws allow that a shareholder or group of shareholders, representing at least five percent (5%) of the capital, requests for Specialized Audits different from those conducted by the company's Statutory Auditor. Depending on its shareholding structure, the company may establish a percentage lower than five percent (5%).

4.5 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description:						
The main shareholder of FINDETER is Grupo Bicentenario SAS with a participation of 92.5477%, the Bylaws establish that specialized audits may be requested by shareholders representing at least 5% of stocks.						
NO. Explain:						
N.A Please specify the rules preventing adoption of this recommendation:						
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Date of Implementation	18/01/2012					
Dates of Modification	22/04/2024					

4.6. In order to exercise this right, the company has a written procedure with the provisions set forth in the recommendation 4.6.

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4.6 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description						
It is available in the Appendix I of the Good Governance Code, General Assembly of Shareholders Regulations, Letter O						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	30/11/2012					
Dates of Modification	12/12/2019					

Action No. 5: Directors' Performance in operations of change or takeover of the company

5.1. Directors and Senior Managers have expressly accepted in their Letters of Acceptance or contracts that as of the moment they are aware of the presentation of a takeover bid or other relevant operations, such as mergers or divisions, there will be periods during which they undertake not to negotiate company's shares directly or indirectly through an intermediary.

5.1 Action implemented	YES	☐	NO	☐	N.A.	☒
YES. Please provide a brief description.						
NO. Explain:						
N.A Please specify the rules preventing adoption of this recommendation:						
FINDETER is a financial entity that belongs to the Government and its shares are not traded in the stock exchange. In addition, nowadays, Findeter is not authorized to perform takeover bids, to merge or divide.						
Date of Implementation						
Dates of Modification						

Action No. 6: Value of integrated companies in Conglomerates

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6.1. Notwithstanding the independence of each individual company integrated to the Conglomerate and the responsibilities of their management bodies, **there is an organizational structure** within the Conglomerate. It determines for the three (3) levels of governance - Shareholders Meeting, Board of Directors and Senior Management - the key bodies and individual positions, and the relationships among them. It is public, clear and transparent, and establishes clear lines of responsibility and communication. It simplifies strategic guidance, supervision, control and effective management of the Conglomerate.

6.1 Action implemented	YES	☐	NO	☐	N.A.	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation: Findeter is part of the Bicentenario S.A.S. economic group as a subsidiary. Grupo Bicentenario S.A.S., in accordance with its founding regulations, Decree Law 2111 of 2019, has governing bodies such as the Board of Directors and the Shareholders' Meeting. The controlling entity participates in the general shareholders' meeting as Findeter's majority shareholder and participates in the selection of the members of the Board of Directors. Findeter maintains its governing (Senior Management) and control bodies with the participation of Grupo Bicentenario. Resolution 1481 of 2024 of the Colombian Financial Superintendency identifies the financial conglomerate Grupo Bicentenario SAS as a financial holding company, and identifies the entities that comprise the Grupo Bicentenario financial conglomerate, including FINDETER as a national subsidiary.						
Date of Implementation						
Dates of Modification						

6.2 The parent company and its most important subsidiaries have established a **framework for institutional relations** by concluding a public agreement approved by the Board of Directors of each of those companies, which regulates the matters indicated in the recommendation 6.2.

6.2 Action implemented	YES	☐	NO	☐	N.A.	☒
YES. Please provide a brief description:						
NO. Explain:						

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N.A. Please specify the rules preventing adoption of this recommendation:

Findeter is part of the Bicentenario S.A.S. economic group as a subsidiary. Grupo Bicentenario S.A.S., in accordance with its founding regulations, Decree Law 2111 of 2019, has governing bodies such as the Board of Directors and the Shareholders' Meeting. The controlling entity participates in the general shareholders' meeting as Findeter's majority shareholder and participates in the selection of the members of the Board of Directors. Findeter maintains its governing (Senior Management) and control bodies with the participation of Grupo Bicentenario. Resolution 1481 of 2024 of the Colombian Financial Superintendency identifies the financial conglomerate Grupo Bicentenario SAS as a financial holding company, and identifies the entities that comprise the Grupo Bicentenario financial conglomerate, including FINDETER as a national subsidiary.

Date of Implementation	
Dates of Modification	

Action No. 7: Dispute resolution

7.1. Except for disputes among shareholders, or between shareholders and the company or its Board of Directors, which must be settled in ordinary courts by express legal provision, **the Corporate Bylaws include mechanisms for dispute resolution such as direct agreement, amicable settlement, conciliation or arbitration.**

7.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description:						
It is available in Article 73 of the Corporate Bylaws, Disputes and Conflicts of Interest and in the Code of Ethics of Findeter, Chapter 6						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	14/05/1990					
Dates of Modification	20/12/2019					

COLOMBIAN FINANCIAL SUPERINTENDENCE

I. GENERAL SHAREHOLDERS MEETING

Action No. 8: Functions and Competence.

8.1. In addition to other functions assigned to the General Shareholders Meeting by the legal framework, **the Bylaws expressly include the functions of the General Shareholders Meeting listed in the recommendation 8.1.,** and emphasize their exclusivity and non-assignability.

8.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: We clarify: i) Regarding the remuneration of the Board of Directors, the Ministry of Finance and Public Credit sets the fees for the members of the Board of Directors (Resolution 1173 of May 14, 2024). Regarding the remuneration policy for Senior Management, this function is delegated to the Board of Directors, in accordance with Article 42 (g) of the ES, by the General Shareholders' Meeting. ii) Regarding the approval of a succession policy, it is established as a function of the General Shareholders' Meeting, in accordance with the provisions of paragraph, numeral 4 of article 32 of the ES) iii) Regarding the acts carried out on strategic assets, said function is assigned to the Board of Directors (literal a, j, l, r, o, x, gg art. 42. Bylaws) and, iv) It is established as a function of the Shareholders' Meeting provided for in paragraph, numeral 5, of article 32 of the ES.						

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NO. Explain:	
N.A. Please specify the rules preventing adopting of this recommendation:	
Date of Implementation	19/04/2024
Dates of Modification	19/04/2024

Action No. 9: Rules of the General Shareholders Meeting

9.1. The company has established the Rules of the General Shareholders Meeting that govern all matters it addresses, e.g., notice of call, preparation of the information to be received by the shareholders, attendance, development and exercise of political rights of shareholders, so that they are fully informed of all the development regime for the sessions of the Meeting.

9.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: "Rules of the General Assembly Meeting" (Appendix I – Good Governance Code).						
NO. Explain:						
N.A Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	28/09/2009					
Dates of Modification	12/12/2019					

Action No. 10: Call of the General Shareholders Meeting

10.1. In accordance with the right of information of the shareholders, **the Bylaws establish that the ordinary General Shareholders Meeting shall be convened at least thirty (30) calendar days in advance. Extraordinary meetings shall be convened at least fifteen (15) calendar days in advance.** The foregoing is without prejudice to the established legal terms for corporate reorganizations (e.g. merger, division or transformation).

10.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description In accordance with Article 26 of the Corporate Bylaws "Meetings and Calls", and pursuant to Article 424 of the Commercial Code, the call to the Ordinary Meeting, where the balance of year-end is approved, will						

COLOMBIAN FINANCIAL SUPERINTENDENCE

be held with at least 15 calendar days in advance. In relation to the extraordinary meeting, the call will be at least 5 calendar days in advance.	
NO. Explain:	
N.A Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	15/05/1990
Dates of Modification	15/01/2019

10.2. In addition to the traditional and obligatory means provided by the legal framework, **the company ensures maximum publicity and advertising of the call** by using electronic means, such as the corporate website, alert messages via individualized e-mail, and even, if appropriate, through social networks.

10.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description						
FINDETER informs shareholders through the notice of call (Article 26 of the Corporate Bylaws stating that calls to the meetings are made in writing and addressed to each shareholder), website, and individualized e-mail. Furthermore, in the Good Governance Code, Annex I, Section C						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	01/01/2009					
Dates of Modification	12/12/2019					

10.3. Aiming to increase the transparency of the decision-making process during the General Meeting, besides indicating every item in the Agenda of the meeting, **the company has decided that simultaneously with the call or at least fifteen (15) calendar days prior to the meeting, the Proposed Agreements** for each item of the agenda that the Board of Directors will submit to the General Meeting shall be made available to the shareholders.

10.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description:						

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Section C, Annex 1 of the Code of Good Governance. However, it is clarified that Findeter's General Shareholders' Meeting does not issue resolutions; its decisions are contained in the minutes, which are binding on the company's governing bodies.

NO. Explain:

N.A. Please specify the rules preventing adoption of this recommendation:

Date of Implementation	22/04/2024
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Date of Modification	22/04/2024
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10.4. Demerger may only be analyzed and approved by the General Shareholders Meeting provided that this item has been expressly included in the notice of call for the corresponding meeting.

10.4 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: It is established as a function of the Shareholders' Meeting provided for in paragraph, numeral 5, of article 32 of the ES.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	22/04/2024					
Date of Modification	22/04/2024					

10.5. The Agenda proposed by the Board of Directors includes the precise content of the issues to be addressed. Relevant issues are not hidden or masked under vague, generic, too general or broad mentions as "*other*" or "*propositions and others*".

10.5 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						

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Agenda includes all issues to be addressed in the Board of Directors meeting. Good Governance Code, annex 2.	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	13/11/2001
Date of Modification	12/12/2019

10.6. In the event of amendment to the Bylaws, each article or group of articles, being substantially independent, is voted separately. In any case, an article is voted on a separated basis upon request by any shareholder or group of shareholders, representing at least five percent (5%) of the share capital, during the Meeting, prior notification of such right to the shareholder.

10.6 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
Yes, although it is not expressly documented, in the sessions of the General Assembly of Shareholders, each article is presented and put to the vote individually, together with its modification proposal and this practice will be included in a proposal directed to the Corporate Governance Committee and subsequently to the Board of Directors.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	31/01/2013					
Date of Modification	15/01/2019					

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10.7. Notwithstanding the provisions set forth in article 182 of Commerce Code, aiming to strengthen and guarantee shareholders' inspection and information right prior to the Meeting, **Bylaws acknowledge shareholders' right to, regardless their equity stake, propose introduction of one or more items to be addressed in the Agenda** of the General Shareholders Meeting, within a reasonable limit and provided that such request for new items is justified. Request by shareholders must be submitted within five (5) calendar days following the publication of the notice of call.

10.7 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Implement to the code General Shareholders Meeting Rules (Appendix I of the Good Governance Code, Section C).						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	15/12/2015					
Date of Modification	12/12/2019					

10.8. If the Board of Directors dismisses the request, **it undertakes to answer in written** to those requests supported, as minimum, by a five percent (5%) of the share capital or a lower percentage established by the Company according to the equity stake. The response **explains the reasons for the decision** and informs shareholders of their right to submit proposals during the Meeting, in accordance with the provisions set forth in the article 182 of Commerce Code herein mentioned.

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10.8 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: It is included in the General Shareholders Meeting Rules (Appendix I of the Good Governance Code Chapter C).						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	15/12/2015					
Date of Modification	12/12/2019					

10.9. In the event that the Board of Directors accepts the request, once the deadline for shareholders to propose new issues has expired pursuant to the previous recommendations, **a supplement to the call for the General Shareholders Meeting is published, at least** fifteen (15) calendar days prior to the meeting.

10.9 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: General Shareholders Meeting Rules (Appendix I of the Good Governance Code, Section C)						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	15/12/2015					
Date of Modification	12/12/2019					

10.10. During the same period set forth in section 10.7, **shareholders may also present, on a justified basis, new Agreement Proposals** about matters previously included in the Agenda. For these requests, the Board of Directors acts in accordance with the provisions set forth herein in sections 10.8 and 10.9.

10.10 Action implemented	YES	☒	NO	☐	N.A	☐
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YES. Please provide a brief description: The General Shareholders Meeting of Findeter does not conclude any Agreements. Its decisions are registered in Minutes and are binding on the Company's bodies. Nevertheless, shareholders regardless their equity stake may propose to the Board of Directors introduction of one or more items to be discussed at the General Shareholders Meeting Agenda, if they justify that request. General Shareholders Meeting Rules (Appendix I of the Good Governance Code, Chapter III (A) (1.3)).	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	15/12/2015
Date of Modification	12/12/2019

10.11.The Company undertakes to employ electronic media, mainly the corporative website with exclusive access for shareholders to forward documents and associated information to each item of the meeting Agenda.

10.11 Action implemented	YES ☒ NO ☐ N.A ☐
YES. Please provide a brief description: General Shareholders Meeting Rules (Appendix I of the Good Governance Code, Section C)	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	15/12/2015
Date of Modification	12/12/2019

10.12.Company's Bylaws acknowledge shareholders' right to request sufficiently in advance for information or clarifications they deem appropriate, through traditional channels and/or where applicable, through new technologies, or to notify in written the questions they deem necessary as to issues included in the Agenda, documentation received or public information disclosed by the company. Pursuant to the term established by the Company to convene the General Shareholders Meeting, the Company sets forth the period for shareholders to exercise this right.

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10.12 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: FINDETER notifies shareholders via the notice of call (article 26 of Bylaws in force indicating that notice of call for meetings is in written and forwarded to each shareholder), on the website and by individualized email. Furthermore, in the Good Governance Chapter III (A) (1.3), such channels for announcing the notice of call are included.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	14/05/1990					
Date of Modification	12/12/2019					

10.13. The company considers refusal of the requested information if, pursuant to internal procedures, it is deemed: i) unreasonable; ii) irrelevant to know the Company's progress or interests; iii) confidential, this will include privileged information on the stock market field, trade secrets, ongoing operations whose successful completion for the company substantially depends on the secret of trading, and iv) others whose disclosure could cause imminent severe danger in its competitiveness.

10.13 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: The Good Governance Code in force sets forth this provision Chapter III (A) (1.3)						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	15/12/2015					
Date of Modification	12/12/2019					

10.14. When the response given to a shareholder might advantage him, the Company guarantees access by other shareholders to the response on a simultaneous basis, in accordance with the mechanisms set forth in respect thereof and under the same terms.

10.14 Action implemented	YES	☒	NO	☐	N.A	☐
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YES. Please provide a brief description: The Good Governance Code in force sets forth this provision Chapter III (A) (1.3)	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	15/12/2015
Date of Modification	12/12/2019

Action No. 11: Proxy Regulation

11.1. Notwithstanding the limitations set forth in article 185 of the Commerce Code, Regulation Letter 24 of 2014 and its modifying, supplementary and substitutionary law, **the Company does not restrict shareholders' right to appoint a proxy for the General Shareholders Meeting**, their vote being subject to delegation to any other person, shareholder or not.

11.1 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Provisions set forth in art. 184 of the Commerce Code, substituted by art. 18 of Law 222/1995 are satisfactorily followed. A copy of the suggested power of attorney is forwarded along with the notice of call information. Furthermore, this Action was incorporated to the Good Governance Code in Appendix I "General Shareholders Meeting Rules", Section D						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	15/12/2015					
Date of Modification	12/12/2019					

11.2. The Company minimizes the use of blank vote delegation, without vote instructions, by actively promoting use of a standard model of proxy letter forwarded by the company to each

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shareholder or made public on its website. The model letter includes the Agenda items and their respective Agreement Proposals, determined in accordance with previously established procedures and to be analyzed by shareholders. Objective is for the shareholder, if deemed convenient, to indicate, in each case, the sense of his vote to his proxy.

11.2 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Findeter implements the provisions set forth in art. 184 of the Commerce Code, substituted by art. 18 of Law 222/1995. Shareholders receive a copy of the suggested proxy along with the notice of call information. Furthermore, this Action was incorporated to the Good Governance Code in Appendix I "General Shareholders Meeting Rules" Section D						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	15/12/2015					
Date of Modification	12/12/2019					

Action No. 12: Attendance by people other than shareholders

12.1. Aiming to strengthen the role of the General Shareholders Meeting in shaping the Company's will and to become a much more participative body, the **Company's General Shareholders Meeting Rules require the Board of Directors members and specially the Presidents of the Board of Directors Committees, as well as the Company's CEO (President), to attend the Meeting** in order to answer to shareholders' questions.

12.1 Action implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Good Governance Code in Appendix I "General Shareholders Meeting Rules" Section I						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	14/05/1990					
Date of Modification	12/12/2019					

COLOMBIAN FINANCIAL SUPERINTENDENCE

II. BOARD OF DIRECTORS

Action No. 13: Functions of the Board of Directors

13.1. Bylaws expressly specify those **functions not to be delegated to Senior Management**, including but not limited to those set forth in recommendation 13.1.

13.1 Action implemented	YES	☐	NO	☒	N.A	☐
YES. Please provide a brief description:						
NO. Explain:						
The Statutes of Findeter (EP No. 0846 of April 22, 2024 Notary 67 of the Bogotá Circle), in its article 42 contain the functions of the Board of Directors of the Entity, where those indicated in measure 13.1 are collected in a general manner. However, it is not specified that they cannot be delegated.						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation						
Date of Modification						

13.2. Notwithstanding the autonomy of the Subsidiary Companies' governance bodies, **when the company is parent in a Conglomerate**, these Board of Directors' functions are of a group approach and **developed through general policies, guidelines or information requests respecting the balance between the interests of the parent and the subsidiaries, and the conglomerate as a whole.**

13.2 Action implemented	YES	☐	NO	☐	N.A	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Findeter is part of the Bicentenario S.A.S. economic group. Grupo Bicentenario S.A.S., in accordance with its creation regulations, Decree Law 2111 of 2019, has administrative bodies such as a Board						

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of Directors and a Shareholders' Meeting. Regarding the controlling entity's participation, it participates in the general shareholders' meeting as Findeter's majority shareholder and participates in the selection of the members of the Board of Directors. Findeter continues to have its administrative and control bodies with the participation of Grupo Bicentenario. Resolution 1481 of 2024 of the Colombian Financial Superintendence identifies the financial conglomerate Grupo Bicentenario SAS as a financial holding company and identifies the entities that are part of the Grupo Bicentenario financial conglomerate, including FINDETER as a national subsidiary.	
Date of Implementation	
Date of Modification	

Action No. 14: Board of Directors Rules

14.1. The Board of Directors approved the internal rules that govern its organization and functioning, as well as the functions and responsibilities of its members, Chairman and Secretary of the Board of Directors, and their duties and rights. Such rules are distributed among the shareholders and are binding on the members of the Board of Directors.

14.1 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: Literal hh) Article 42 ES, its regulations are provided in Annex 2 of the Code of Good Governance, and this can be found on the Findeter website at the following link: https://www.findeter.gov.co/relacion-con-inversionistas						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	28/09/2009					
Date of Modification	12/12/2019					

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Action No. 15: Board of Directors Dimension

15.1. The company has statutorily chosen not to appoint Alternate Members of the Board of Directors.

15.1 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
Article 33 of the ES modified the composition of the Board of Directors to a total of 9 principal members, reserving a section for FINDETER Employees.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation		22/04/2024				
Date of Modification		22/04/2024				

Action No. 16: Board of Directors Composition

16.1. Under the assumption that all of the Board of Directors members will benefit the Company once they have been elected, in an exercise of maximum transparency, **the Company identifies origin of each Board of Directors member** in accordance with the scheme defined in recommendation 16.1.

16.1 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
The composition of the Board of Directors is included in the second paragraph, independent members, as well as in literal I, Independence of						

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the members of the Board of Directors of Annex 2 of the Board of Directors Regulations of the Code of Good Governance.	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	12/12/2019
Date of Modification	12/12/2019

16.2. The company has a procedure, articulated through the Appointment and Remuneration Committee or similar, allowing Board of Directors, through its own dynamics and the conclusions from the annual assessments, to achieve objectives stated in the recommendation 16.2.

16.2 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: The profiles of the Board of Directors members are set forth in Article 34, Qualifications of the Board of Directors as a Collegiate Body of the ES, which are verified prior to their appointment by the Entity's General Secretary, paragraph one of the same article. The profiles are also described in Annex 2, Section F of the Board of Directors Regulations of the Code of Good Governance. The results of the evaluation are presented to the Board of Directors and subsequently recorded in the Entity's annual management report.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	22/04/2024					
Date of Modification	22/04/2024					

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16.3. The Board of Directors informs shareholders of the professional profiles identified as necessary, so that different actors, mainly controlling, significant shareholders, families, groups of shareholders and institutional shareholders, if any, and the Board of Directors itself, may identify most suitable candidates.

16.3 Action Implemented	YES	☐	NO	☐	N.A	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
The majority shareholder, Grupo Bicentenario, proposes candidates for membership on the Board of Directors. These candidates are reviewed by Findeter's General Secretary in accordance with the provisions of the first paragraph of Article 34, Qualifications of the Board of Directors, of the ES, and are subsequently presented at the Shareholders' Meeting.						
Date of Implementation						
Date of Modification						

16.4. The Company considers that mere assessment of curricula vitae by shareholders is an insufficient resource to determine candidates' suitability. **An internal procedure to assess candidate's legal incompatibilities and ineligibilities and adaptation to the Board of Directors necessities is available** through the evaluation of a series of criteria that candidates' functional and personal profiles must match, and verification of compliance with some target requirement to become member of the Board of Directors and some additional ones to become Independent Director.

16.4 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
In addition to the evaluation of the resumes carried out by the General Secretariat to determine the suitability of the candidates to perform the functions as member of the Board of Directors, the regime of disqualifications and incompatibilities is analyzed, in accordance with Article 72 of the Statutes and the constitutional and legal provisions (Article 126 of the Political Constitution modified by Article 2 of Legislative Act 02 of 2015, Decree 128 of 1976, Decree 663 of 1993, the Commercial Code, Article 202) and based on the information stated in the resumes. These are contained in Annex 2 of the Board of Directors Regulations, section N. Likewise, the majority shareholder proposes the candidates for the Assembly to elect the members, as						

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established in section 2, III Good Governance Policies, in accordance with section F of Annex 2 of the Good Governance Code.	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	14/05/1990
Date of Modification	12/12/2019

16.5. In addition to the independence requirements set forth in Law 964 of 2005, **the company voluntarily adopted a more accurate definition for independence** than that provided by the aforementioned law. Such definition has been adopted as a framework through the Board of Directors Rules, and includes, among other requirements needing assessment, relations or links of any kind of the candidate for Independent Director with controlling or significant shareholders and their Affiliate Parties, domestic or international ones, and demands a double independence declaration: (i) from the candidate to the Company, shareholders and Senior Managers, documented in his Acceptance letter, and (ii) from the Board of Directors as to candidate's independence.

16.5 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
It is found in the second paragraph of article 33 composition of the Board of Directors of the ES and in Annex 2 REGULATIONS OF THE BOARD OF DIRECTORS, Literal I. INDEPENDENCE OF ITS MEMBERS.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	15/12/2015					
Date of Modification	12/12/2019					

16.6. The Company, through its internal regulation, considers that the Board of Directors, through its Chairman and supported by the Appointment and Remuneration Committee or similar, is the most appropriate body to centralize and coordinate prior to the General Shareholders Meeting the composition of the administration body. Accordingly, shareholders who pursuant to their equity stake aspire to become part of the Board of Directors, may acknowledge the Board of Directors needs and manifest their aspirations, negotiate the equity balance and the distribution among the different category of members, present their

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candidates and accept assessment by the Appointment and Remuneration Committee of their candidates' suitability prior to the General Shareholders Meeting.

16.6 Action Implemented	YES	☐	NO	☐	N.A	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation: The governing bodies are regulated by Decree 4167 of 2011. Shareholder status is also restricted by the conditions established in Law 57 of 1989 and Article 268 of the Organic Statute of the Financial System (amended by Decree 1164 of 1999, Article 16). Candidates are also reviewed by the Entity's General Secretary prior to their presentation to the Assembly.						
Date of Implementation						
Date of Modification						

16.7. The Board of Directors Rules determine that assessment of candidates' suitability is an activity to be completed prior to the General Shareholders Meeting, so that the necessary information (personal qualities, suitability, career, experience, integrity, etc.) about candidates proposed to become directors is at shareholders' disposal, sufficiently in advance for promptly study.

16.7 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
The resumes of candidates for Board of Directors are made available to the Assembly at the corresponding session. Additionally, Article 34 of the ES establishes the qualifications for Board members. The Code of Good Governance, Annex 2, Section F, establishes the profiles of Board members, and the candidates are reviewed prior to their presentation to the Assembly by the Entity's General Secretary (first paragraph of Article 34 ES).						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						

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Date of Implementation	28/11/2017
Date of Modification	12/12/2019

Action No. 17: Board of Directors Functional Structure

17.1. The Board of Directors Rules stipulate that **Independent and Non-executive Directors shall always outnumber Executive Directors**, whose number, if integrated to the Board of Directors, constitutes the minimum necessary to attend information and coordination needs between the Board of Directors and the Senior Management of the Company.

17.1 Action Implemented	YES	☐	NO	☐	N.A	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation: Neither the law nor the Bylaws provide for executive members on Findeter's Board of Directors; only equity and independent members are allowed. Article 33, "Composition of the Board of Directors," establishes that at least three members must be independent.						
Date of Implementation						
Date of Modification						

17.2. From the minimum percentage of twenty-five percent (25%) of Independent Directors fixed by Law 964 of 2005, **the Company analyzes and voluntarily increases the number of Independent Directors**, taking into account, among others, that the number of Independent Directors is related to the Free Float.

17.2 Action Implemented	YES	☐	NO	☒	N.A	☐
YES. Please provide a brief description:						

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NO. Explain: The composition of the Board of Directors is established in article 33 of the ES, which determines that the number of members is 9, of which 3 of them are independent.	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	
Date of Modification	

Action No. 18: Board of Directors Organization

18.1. The functions of the Chairman of the Board of Directors are indicated in the Bylaws and his main responsibilities are those set forth in recommendation 18.1.

18.1 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Functions of the Chairman of the Board of Directors are specified in Appendix 2 of the Good Governance Code, Section C						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	30/11/2012					
Date of Modification	12/12/2019					

18.2. Internal regulation of the Company provides for the possibility for the Chairman of the Board of Directors to receive a differentiated treatment from that of the other directors in both his duties and remuneration, as consequence of his specific functions scope and greater time commitment.

18.2 Action Implemented	YES	☒	NO	☐	N.A	☐
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YES. Please provide a brief description: Article 36 Presidency of the Board of Directors of the ES and in III Good Governance Policies, A Management Policies, 2. Board of Directors, 2.2 Remuneration and in Annex 2 Literals C of the Code of Good Governance	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	18/05/2020
Date of Modification	23/06/2020

18.3. The Bylaws compile rules for appointment of the Secretary of the Board of Directors, being outlined those indicated in recommendation 18.3.

18.3 Action Implemented	YES	☐	NO	☐	N.A	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation: The Secretary of the Board is Findeter Secretary-General, who is appointed and removed by Findeter CEO (Art. 37 and literal d of the article 46) of FINDETER Corporate Bylaws).						
Date of Implementation						
Date of Modification						

18.4. The functions of the Secretary indicated are in the Board of Directors Rules, being outlined those set forth in recommendation 18.4.

18.4 Action Implemented	YES	☒	NO	☐	N.A	☐
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YES. Please provide a brief description: Included in the Appendix 2 of the Good Governance Code, Section D	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	30/11/2012
Date of Modification	12/12/2019

18.5. The Board of Directors has formed an Appointment and Remuneration Committee.

18.5 Action Implemented	YES	☒	NO	☐	N .A	☐
YES. Please provide a brief description: An Appointments and Remuneration Committee has not been established, however the functions in this matter are assigned to the Board of Directors in literal c, d, f and h of article 42 of the Current Bylaws), and the Corporate Governance Committee (Good Governance Code), all of this supported by a solid personnel selection policy from the human talent area.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	22/04/2024					

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Date of Modification	22/04/2024
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18.6. The Board of Directors has formed a Risk Committee.

18.6 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: The Entity has an Administrative Risk Committee, which is of regulatory origin (Circular 5 of 2023) and is in charge of supporting the Board of Directors and the Presidency of Findeter on the management and administration of risk, matters that are subsequently brought to the knowledge of the Board of Directors, as well as additional topics proposed by the Administration. Likewise, the GAP Committee for Asset and Liability Management has been set up to support the Board of Directors, which has among its functions aspects related to the entity's Risk management, which are also reviewed by the Board members who participate in the process itself and put to consideration in the Board of Directors.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation		23/02/1996				
Date of Modification		12/12/2019				

18.7. The Board of Directors has formed a Corporate Governance Committee.

18.7 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Included in the Good Governance Code Chapter III (2) (2.4.2)						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						

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Date of Implementation	28/11/2017
Date of Modification	12/12/2019

18.8. If the company has deemed establishment of all these Committees as not necessary, their functions has been allocated among the existing ones or the Board of Directors has assumed them in totality.

18.8 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
There are four (4) Committees supporting the Board of Directors: Audit Committee, Corporate Governance Committee, GAP Committee for Asset and Liability Management and the Credit Committee supporting the Board of Directors. First paragraph of Article 33 of the Bylaws establishes the committees that the Board of Directors has..						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	16/12/2015					
Date of Modification	12/12/2019					

18.9. Each Committee of the Board of Directors has Internal Rules governing the details of its establishment, the matters, functions on which the Committee must work, and its operation. It pays special attention to the communication channels among Committees and the Board of Directors, and for Conglomerates, to the liaison and coordination mechanisms among Committees of the Parent's Board of Directors and those of the Subsidiary Companies, if any.

18.9 Action Implemented	YES	☒	NO	☐	N .A	☐
YES. Please provide a brief description: It is found in Good Government Policies III, section 2 Board of Directors, subsection 2.4 Support Committees of the Board of Directors.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						

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Date of Implementation	20/11/2003
Date of Modification	12/12/2019

18.10. The Committees of the Board of Directors are exclusively integrated by Independent or Non-executive Directors, with a minimum of three (3) members and leaded by an Independent Director. For the Remuneration and Nomination Committee, Independent Directors are always in majority.

18.10 Action Implemented YES ☒ NO ☐ N.A ☐

YES. Please provide a brief description: T The Board of Directors' support committees are composed predominantly of independent members. They will consist of a maximum of five members based on their expertise and knowledge of the Board committees' topics, and a minimum of three to ensure a quorum for each committee, appointed by the Board of Directors itself. At least one member of each committee must be independent.
NO. Explain:
N.A. Please specify the rules preventing adoption of this recommendation:

Date of Implementation	29/01/2019
Date of Modification	06/12/2022

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18.11. Committees of the Board of Directors can receive support on an exceptional or permanent basis from Senior Managers with experience on matters of their competence and/or external experts.

18.11 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Code of Good Governance, Annex 2 of the Board of Directors Regulations. Section e) "Special Guests."						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/30/2012					
Date of Modification	12/12/2019					

18.12. For integrating their Committees, the Board of Directors analyzes members' profiles, knowledge and professional experience in connection with the matter addressed by the Committee.

18.12 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Committee integration deals with the profiles of the entity's senior managers in accordance with the matter addressed by the corresponding Committee.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/20/2003					
Date of Modification	12/16/2015					

18.13. After Committee meetings minutes are recorded; their copies are forwarded to each member of the Company's Board of Directors. If Committees are entitled for decision making, minutes follow the provisions set forth in articles 189 and 431 of the Commerce Code.

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18.13 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description:						
Each Committee records its own minutes in accordance with the Commerce Code. Likewise, information in the Committees minutes is notified to the members of the Board of Directors through different reports forwarded to the Board of Directors and presented by different Vice presidents who lead or belong to the Committees.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/20/2013					
Date of Modification	12/16/2016					

18.14. Provided that the applicable legal or regulatory framework requires their constitution, as to Conglomerates internal regulations establish that **Subsidiaries Companies' Boards of Directors may choose not to constitute specific Committees** for addressing certain matters, these task being assumed by Committees of the Parent's Board of Directors. That does not mean a transfer by Subsidiaries Companies' Board of Directors to the Parent of their responsibilities.

18.14 Action Implemented	YES	☐	NO	☐	N.A	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Grupo Bicentenario S.A.S., in accordance with its creation norm, Decree Law 2111 of 2019, has administrative bodies such as the Board of Directors and the Shareholders' Assembly; Likewise, Findeter is part of the Bicentenario S.A.S. economic group, in terms of the participation of the parent, it is part of the general shareholders' meeting as the majority shareholder of Findeter, in turn participates in the selection of the members of the Board Directive; Findeter continues with its administration and control bodies with the participation of Grupo Bicentenario.						

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Date of Implementation	
Date of Modification	

18.15. The main task of the Audit Committee is to assist the Board of Directors in its supervision function by assessing the accounting procedures, liaison with the Statutory Auditor and, in general, revising the Company's Control Architecture, including auditing the risk management system implemented by the Company.

18.15 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: The Audit Committee has monitored the results of the audits at various meetings, including the accounting procedures and the review of the control architecture and the risk management system. Furthermore, the Statutory Auditor's Office also periodically submits reports to the Board and the Audit Committee. The functions of the Audit Committee are defined in the Code of Good Governance and are consistent with the recommendations and instructions issued by the Colombian Financial Superintendency through its circulars. NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/30/2012					
Date of Modification	12/12/2019					

18.16. Audit Committee members have knowledge of accounting, finance and other related matters. It allows them to talk about issues addressed by the Committee as properly as to understand its scope and complexity.

18.16 Action Implemented	YES	☒	NO	☐	N.A	☐
YES. Please provide a brief description: Curricula vitae of the Board of Directors members are published on the Entity's website. Committee members have the experience and sufficient knowledge to talk about issues addressed in each Committee. NO. Explain:						

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N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	11/30/2012
Date of Modification	12/15/2015

18.17. Upon request by the President of the General Shareholders Meeting, **the President of the Audit Committee informs the General Shareholders Meeting** as to the specific aspects of the work performed by the Committee, e.g., analysis of the scope and content of the Statutory Auditor's Report.

18.17 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description:						
An annual report is submitted to the Board of Directors on the operation of the Internal Control System and the work performed by the Audit Committee for the corresponding year. This report is made available to the Ordinary Shareholders' Meeting.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/30/2012					
Date of Modification	12/12/2019					

18.18. Audit Committee Internal Rules assign its functions stated in recommendation 18.18.

18.18 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES Explain:						
These are set forth in the Code of Good Governance, Chapter III, GOOD GOVERNANCE POLICY, section 2.4.2. Functions of the Audit Committee.						
Additionally, the functions of the Entity's Audit Committee are aligned with Circulars 029 of 2014 and 008 of 2023 issued by the Colombian Financial Superintendency.						
NO. Explain:						

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N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	11/30/2012
Date of Modification	12/12/2019

18.19. Appointment and Remuneration Committee main objective is to assist the Board of Directors in exercising its decisional and advisory functions as per to the matters of appointment and remuneration of the Board of Directors members and Senior Managers and to monitor observance of the Corporate Governance Rules by periodically revising its compliance, recommendations and principles (in those cases when this function is expressly assigned to another Company's Committee).

18.19 Action Implemented	YES	☒	NO		N.A.	
YES. Provide a brief description:						
Findeter does not have an Appointments and Compensation Committee; however, there is a Corporate Governance Committee, which is responsible for the appointment of the Chairman and Senior Management.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation	22/04/2024					
Date of Modification	22/04/2024					

18.20. Some members of the Appointments and Remunerations Committee possess knowledge in strategy, human resources (recruitment and selection, hiring, training, administration or management of staff), wage policy and related matters, with a sufficient level to understand the scope and complexity that these subjects present to society.

18.20 Action Implemented	YES	☒	NO		N.A.	
YES. Provide a brief description:						
Currently, some members have experience in this sector, and we also have the support of the Human Talent Department in recruiting staff.						
NO. Explain:						

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N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation	22/04/2024
Date of Modification	22/04/2024

18.21. At the request of the Chairman of the Assembly, the Chairman of the Appointment and Remuneration Committee may report to the General Shareholders Meeting on specific aspects of the work done by the Committee, such as the monitoring of remuneration policies of the Board of Directors and Senior Management.

18.21 Action Implemented	YES	☐	NO	☒	N.A.	☐
YES. Provide a brief description:						
NO. Explain: The fees of the Board of Directors members are established by the Ministry of Finance and Public Credit through an administrative act (Resolution 1173 of May 14, 2024). Regarding the remuneration policy for the Senior Management team, this is set by the Board of Directors in accordance with Article 42, paragraph g) of the Bylaws, and its policy is also approved by this collegiate body in the case of Directors (Strategic Variable Bonus). Its monitoring is carried out through the Presidency Committee (Circular 5 of 2023), the Corporate Governance Committee, and the results are presented to the Board of Directors.						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation						
Date of Modification						

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18.22. The Rules of Procedure of the Appointment and Remuneration Committee attributes the functions described in the recommendation 18.22.

18.22 Action Implemented	YES	☐	NO	☒	N.A.	☐
YES. Provide a brief description:						
NO. Explain: At a general level, these functions are headed by the Corporate Governance Committee that supports the Board of Directors.						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation						
Date of Modification						

18.23. The main objective of the **Risk Committee** is to assist the Board of Directors in fulfilling its oversight responsibilities in relation to risk management.

18.23 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
Circular 5 of 2023 describes the objective and functions of the Risk and GAP Committee (Management of Administrative Assets and Liabilities) and the GAP Committee for Asset and Liability Management to support the Board of Directors.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation		23/02/1996				
Date of Modification		28/11/2017				

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18.24. At the request of the Chairman of the General Shareholding Meeting, **the Chairman of the Risks Committee may report to the General Shareholders Meeting** on specific aspects of the work done by the Committee.

18.24 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
Through the Annual Management Report, put to the consideration of the shareholders with due anticipation, the issues of managing the different risks, to which the entity is exposed, are outlined.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	2/23/1996					
Date of Modification	4/11/2013					

18.25. With the necessary adjustments to distinguish between companies belonging to the financial sector or to the real sector of the economy, and without prejudice to the functions assigned to this Committee by the existing rules, **the Rules of Procedure of the Risk Committee attributed the functions set forth in recommendation 18.25.**

18.25 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
Circular 10 of 2025 contains the functions assigned to this Risk Committee. It is important to highlight that the Risk and GAP Committee (Management of Administrative Assets and Liabilities) informs the Board of Directors of the issues that are subject to approval by this instance of Government.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	2/23/1996					
Date of Modification	28/11/2017					

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18.26. The main task of the Corporate Governance Committee is to **assist the Board in its functions of proposals, and monitoring the actions of the Corporate Governance** adopted by the company.

18.26 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
The Corporate Governance Committee has been assigned the functions in this matter. Good Governance Code, Chapter III, numeral 2 Board of Directors, Corporate Governance Committee 2.4.2.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	28/11/2017					
Date of Modification	12/12/2019					

18.27. The Rules of Procedure of the Corporate Governance Committee attributes the functions described in recommendation 18.27.

18.27 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
Circular 10 of 2025 establishes the functions of the Corporate Governance Committee together with the Code of Good Governance, Chapter III, section 2 Board of Directors, Corporate Governance Committee 2.4.2.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/16/2013					
Date of Modification	28/06/2018					

Action No. 19: Board of Directors Functioning

COLOMBIAN FINANCIAL SUPERINTENDENCE

19.1 The Board of Directors Chairman with the assistance of the Secretary and the President of the company **prepare a work plan for the Board of Directors** for the evaluated period. This tool makes it easy to determine the reasonable number of regular sessions per year and its estimated duration.

19.1 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
In the last session of the Board of Directors of each year, the work schedule for the following year is submitted for discussion and approval by the members (Good Governance Code, Annex II, "Board of Directors Regulations", Literal C, Subliteral m).						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/30/2012					
Date of Modification	12/12/2019					

19.2. With the exception of the entities subject to monitoring that are required minimum to one (1) meeting per month by their regime, **the company's Board of Directors holds between eight (8) and twelve (12) regular meetings per year.**

19.2 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
The article 39 of the Corporate Bylaws shows the periodicity of the meetings of the Board of Directors.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	5/14/1990					
Date of Modification	1/31/2013					

COLOMBIAN FINANCIAL SUPERINTENDENCE

19.3. One (1) or two (2) meetings per year of the Board of Directors are firmly focused on the definition and monitoring of the strategy of the company.

19.3 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
Regarding the definition and monitoring of the strategy, the Board of Directors approves the Strategic Plan and its modifications, and executes this with the advice and support of four committees. In this case, it receives the opinions of the Corporate Governance Committee, which fulfills the functions "e) Monitor" and "k) Participate in the formulation and progress of FINDETER's Strategic Planning and make recommendations for setting goals and indicators prior to their presentation to the Board of Directors" established in the Code of Good Governance, according to the proposed modification and update of the Strategy developed by management each year. Additionally, the Board of Directors monitors the strategic results every quarter through the Control Board, a focus board that summarizes the main results. Administration through this instrument, procedure PES-PR-001. FORMULATION, DEPLOYMENT, EXECUTION, AND MONITORING OF THE STRATEGIC PLAN, of the Integrated Management System, guarantees that: Regarding the definition of the strategy: Activity 6 establishes that the President must submit the Strategic Plan to the Board of Directors for review and approval. Regarding monitoring: It is stipulated that the progress report on compliance with the Strategic Plan and any modifications to it, when applicable, will be submitted to the Board of Directors, and monitoring with the Board of Directors is twice a year. Additionally, this measure is found in the Code of Good Governance, Annex II, "Board of Directors Regulations," Section M, Section n.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	4/29/2014					
Date of Modification	11/07/2018					

19.4. The Board of Directors approves a timetable of regular meetings without prejudice, on an exceptional basis, to meet as many times as necessary.

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19.4 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
In December, within the meeting agenda is submitted for approval the schedule of the following year meetings (Code of Good Governance, Appendix II, Board of Directors Rules, section M). Additionally, the article 39 of the Corporate Bylaws points to the periodicity of the meetings and the minimum of meetings of the Board of Directors, which did not preclude the Board to meet more times.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	7/4/1991					
Date of Modification	12/12/2019					

19.5. Alongside with the call of the meeting, and as a minimum, with an advance of five (5) common days, the documents or information associated with each item on the agenda are delivered to the members of the Board of Directors, so that its members can participate actively and take decisions in a reasoned manner.

19.5 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
It is established in the Good Governance Code, Appendix 2 Board of Directors Rules, section P.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	9/28/2009					
Date of Modification	12/12/2019					

19.6. The Board of Directors Chairman assumes, with the assistance of the Secretary of the Board of Directors, **the responsibility that the members receive the information with enough time** and that this information is useful, so that in the documents that are delivered (*dashboard* of the Board of Directors) should prevail the quality versus the quantity.

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19.6 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description: It is included in the Good Governance Code, Appendix 2 Board of Directors Rules, section P.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	9/28/2009					
Date of Modification	12/12/2019					

19.7. The final responsibility for the preparation of the Agenda for the meetings of the Board of Directors corresponds to the Board of Directors Chairman and not to the President of the Corporation. This is structured in accordance with certain parameters that allow following a logical order of the presentation of the issues and debates.

19.7 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description: It is included in the Good Governance Code, Appendix 2 Board of Directors Rules, section C						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	28/11/2017					
Date of Modification	12/12/2019					

19.8. In the Annual Corporate Governance Report and on the corporate website, the corporation makes public the attendance of members to the Board of Directors and its Committees meetings.

19.8 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description: The attendance of the members of the Board of Directors is made						

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public in the Management and Sustainability Report, which can be found in Findeter's webpage.	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	28/11/2017
Date of Modification	28/11/2017

19.9. Annually, the Board of Directors evaluates the effectiveness of its work as a collegiate body, the one of its committees, and the one of its members, considerate individually. This also includes the evaluation by peers, as well as the reasonableness of its internal rules and the dedication and performance of its members, proposing, in its case, relevant amendments to its organization and operation. In the case of Conglomerates, the Board of Directors of the matrix requires the process of evaluation to be conducted also on the boards of the Subordinate Companies.

19.8 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						
Regarding Findeter, the Good Governance Code, numeral 2.4.2.2., Government Policies, Corporate Governance Committee, literal c. establishes this obligation.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	28/11/2017					
Date of Modification	12/12/2019					

19.10. The Board of Directors alternates the technique of internal self-assessment with the external evaluation carried out by independent consultants.

19.9 Action Implemented	YES	☒	NO	☐	N.A.	☐
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YES. Provide a brief description: Included in the Good Governance Code Chapter III (2.1)	
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation	28/11/2017
Date of Modification	12/12/2019

Action No.20: Rights and Duties of the Board of Directors members.

20.1. The Board of Directors Rules complement the provisions of the regulatory framework, in relation with the rights and duties of the Board of Directors members.

20.1 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description: It is included in the Good Governance Code, Appendix II Board of Directors Rules, Section G and H						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation	12/15/2015					
Date of Modification	12/12/2019					

20.2. The Board of Directors Rules develop the understanding of the company with regard to the duties of the Board of Directors members referred to in the recommendation 20.2.

20.2 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description:						

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It is included in the Code of Good Governance, Annex II Regulation of the Board of Directors, Literal G.	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	12/15/2015
Date of Modification	12/12/2019

20.3. The Board of Directors Rules develop the content of the rights of the Board of Directors members set on the recommendation 20.3.

20.3 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Provide a brief description: include in the Code						
It is included in the Good Governance Code, Appendix II Board of Directors Rules, section G						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	12/15/2015					
Date of Modification	12/12/2019					

Action No. 21: Conflicts of interest.

21.1. The Company has a policy and a procedure defined and formalized in the internal regulations **for the knowledge, management and resolution in case of conflict of interest**, whether direct or indirect, through related parties that may affect the Board of Directors members and other Managers.

21.1 Action Implemented	YES	☒	NO	☐	N.A.	☐
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YES. Please provide a brief description: Contained in the Code of Ethics number 6, Conflicts of Interest	
NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation:	
Date of Implementation	11/30/2012
Date of Modification	12/12/2019

21.2. The procedure for managing the conflicts of interest distinguishes their nature, differentiating between sporadic or permanent conflict of interests. If the conflict of interest is sporadic, the applicable procedure indicates the rules and steps to follow. This should be relatively easy to administer and difficult to evade by the affected. In the case of permanent conflicts of interest, the procedure considers that if this situation affects the whole of the company's operation. This must be understood as a cause for mandatory waiver to the affected since it makes it impossible to stay in office.

21.2 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: Contained in the Code of Ethics, Section 6						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	12/15/2015					
Date of Modification	12/12/2019					

21.3. The Board of Directors members, Legal Representatives, members of the Senior Management, and other administrators of the company **report periodically to the Board of Directors. They report about the Relationships**, whether direct or indirect, that they have between them. In addition, they report the relationship they have with other entities or structures belonging to the conglomerate of which the issuer is part, with the issuer itself, with providers, with clients, or with any other group of interest. The intention is to identify situations that may

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possibly cause conflicts of interest, or influence the direction of its opinion or vote, thus building a *"Map of Related Parties"* of the administrators.

21.3 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: Contained in the Good Governance Code Chapter III (C) (5).						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	11/30/2012					
Date of Modification	12/12/2019					

21.4. The public information that the company publishes annually in its Web page collects **the relevant conflict of interest situations**. This require that the person concerned refrains from a meeting and/or a voting in which the members of the Board of Directors and other managers are present.

21.4 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: It is published on the annual Management and Sustainability Report, which is found in Findeter's webpage.						
NO. Explain:						
N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	28/11/2017					
Date of Modification	28/11/2017					

21.5. The definition of Related Party that the company applies is **consistent with the International Accounting Standard No. 24 (IAS 24)**.

21.5 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: It is included in the Good Governance Code, Chapter III (C) (5)						

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NO. Explain:	
N.A. Please specify the rules preventing adoption of this recommendation: It does not apply because we do not have related parties under principles of international standards.	
Date of Implementation	28/11/2017
Date of Modification	12/12/2019

Action No. 22: Operations with Related Parties.

22.1. The company has a policy that defines the specific procedure for the assessment, approval, and disclosure of transactions with related parties. This include the outstanding balances and relationships between them, except for those operations that have a specific regulation.

22.1 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: It is included in the Good Governance Code, Chapter III (C) (5) NO. Explain: N.A. Please specify the rules preventing adoption of this recommendation:						
Date of Implementation	28/11/2017					
Date of Modification	12/12/2019					

22.2. The policy of the company on operations with related parties addresses the aspects set forth in recommendation 22.2.

22.2 Action Implemented	YES	☒	NO	☐	N.A.	☐
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YES. Please provide a brief description: It is included in the Good Governance Code, Chapter III (C) (5)	
NO. Explain:	
N.A. Please specify the rules preventing adoption of the recommendation	
Date of Implementation	28/11/2017
Date of Modification	12/12/2019

22.3 The policy anticipates that the recurrent related-party transactions are applied in bulk, and carried out at market prices. These are normal in the ordinary course of business, and carried out under adhesion contracts, or general framework contracts. Their conditions are perfectly standardized. The person who acts as a supplier of the good or service concerned, and whose individual amount is not relevant to the company, sets out the prices.

22.3 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: : In accordance with our bylaws (literal J. Art. 41), for the execution of contracts within the ordinary course of Findeter's business, authorization from the Board of Directors is not required; which is reflected in our policy for contracting goods and services.						
NO. Explain						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation	18/01/2012					
Date of Modification	18/01/2012					

Action No. 23: Remuneration of the Board of Directors members.

23.1. The company has a remuneration policy for the Board of Directors, approved by the General Shareholders Meeting and reviewed every year. This **identifies all components of remuneration that can be** satisfied. These components can be fixed or variable. They may include fixed fees for being a member of the Board of Directors, fees for attendance to meetings of the Board and/or of its Committees, and other remuneration of any kind earned in the course of the current year, whatever its cause, either in money or in kind. It also contains the obligations undertaken by the company in the area of pensions, or payment of life insurance premiums, or other concepts, in respect of both the former members and the current ones, as well as those insurance premiums for civil liability (D&O insurance) contracted by the company in favor of the Board of Directors members.

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23.1 Action Implemented	YES	☐	NO	☐	N.A.	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
The remuneration policy is set by the Ministry of Finance and Public Credit (Resolution 1173 May 14, 2024).						
Date of Implementation						
Date of Modification		14/05/2019				

23.2. If the company adopts remuneration systems through the recognition of a variable component linked to the good functioning of the company in the medium and long term, **the remuneration policy incorporates limits to the amount** that the Board of Directors can distribute. If the variable component is related to the benefits of the company or other indicators of management, close of the evaluated period, any contingency that appears in the report of the Statutory Auditor, and that could alleviate the results of the period must be taken into account.

23.2 Action Implemented	YES	☐	NO	☐	N.A.	☒
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
The remuneration policy for the members of the Board of Directors is issued by the Ministry of Finance and Public Credit through Resolution 1173 of May 14, 2024 and does not include a variable remuneration component.						
Date of Implementation						
Date of Modification						

23.3. The Proprietary and Independent Board Members are expressly excluded from remuneration systems that incorporate stock options or a variable remuneration linked to the absolute variance of the stock price.

23.3 Action Implemented	YES	☐	NO	☐	N.A.	☒
YES. Please provide a brief description:						
NO. Explain:						

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N.A. Please specify the rules preventing the adoption of this recommendation: The remuneration policy for the members of the Board of Directors is issued by the Ministry of Finance and Public Credit through Resolution 1173 of May 14, 2024 and does not include a variable remuneration component.	
Date of Implementation	
Date of Modification	

23.4. For each evaluated period, in the framework of the remuneration policy, the General Shareholders Meeting approves a maximum cost for the Board as a result of all remuneration components approved.

23.4 Action Implemented	YES	☐	NO	☐	N.A.	☒
YES. Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation: The remuneration policy for the members of the Board of Directors is issued by the Ministry of Finance and Public Credit through Resolution 1173 of May 14, 2024 and does not include a variable remuneration component.						
Date of Implementation						
Date of Modification						

23.5. The total cash cost of the Board of Directors during the evaluated period is known by the shareholders. This includes all of the remuneration components paid to the Board of Directors members, as well as the reimbursement of expenses. Findeter publishes the information on the website of the company as approved by the Board of Directors.

23.5 Action Implemented	YES	☒	NO	☐	N.A.	☐
YES. Please provide a brief description: In the Notes to the Financial Statements						

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Separately (Related Parties), Transactions with related parties are indicated, indicating the amount of the fees paid to the Members of the Board of Directors for attending meetings of the Board of Directors and Committees. Likewise, said information is published in the entity's Management and Sustainability Report, which can be found in Findeter's webpage.	
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation	12/12/2019
Date of Modification	12/12/2019

Action No. 24: The President of the Company and the Senior Management.

24.1. The governance model of the company provides an effective separation between the administration or company governance (represented by the Board of Directors) **and the normal course of business** (represented by the Senior Management with the leadership of the President of the company).

24.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: It is mandated in the Code of Good Governance Chapter III, Section 4. Likewise, the Corporate Bylaws foresee it in literal e) and f) of Article 42.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	05/14/1990					
Date of Modification:	12/12/2019					

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24.2. The policy of the Board of Directors consists of delegating the general course of business to the Senior Management team and focusing their activity on the general functions of strategy, supervision, governance, and control.

24.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: It is mandated in the Code of Good Governance Chapter III (4). Likewise, the Statutes foresee it in literal e) and f) of Article 42.						
NO. Explain:						
N.A. Name the norms that do not allow the implementation of the recommendation.						
Date of Implementation:		05/14/1990				
Date of Modification:		15/01/2019				

24.3. The president of the Company identifies, assesses, and designates the members of the Senior Management, as they are his immediate collaborators. Alternatively, the Entity may dictate for the members of the Senior Management to be chosen by the Board of Directors among candidates previously proposed by the President of the Company. Regardless of who makes the final designation, the Appointment and Remunerations Committee of the Board of Directors will provide their opinion about the candidates to occupy these executive posts, essential to the Entity.

24.3 Action implemented	YES	☐	NO	☒	N.A.	☐
YES Please provide a brief description:						
NO. Explain: The President of the Entity retains the power to appoint and remove employees of the Company and, in general, to direct and control the Financial Institution's personnel, in accordance with the current legal provisions (Section d) of Article 46 of the Bylaws. However, prior to appointment to positions, the Corporate Governance Committee conducts a pre-appointment review of the candidates, in accordance with the provisions of Section h of Article 42 of the Bylaws.						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		12/12/2019				

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Date of Modification:	12/12/2019
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24.4. The Entity has a clear policy for functions delegations approved by the Board of Directors and/or an outline of powers that shows the authority level of the President of the Company and the other members of the Management.

24.4 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The Corporate Bylaws (Public Deed 0538 of may 23 of 2023) on the literal s) Article 46, empower the President to make delegations, which are specified in different internal documents and procedures documented in the FINDETER Integrated Management System.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	07/04/1991					
Date of Modification:	28/11/2017					

24.5. The Board of Directors, through the Appointment and Retributions Committee **leads annually the performance evaluation of the President of the Entity**, and checks the evaluation of the rest of the members of the Senior Management.

24.5 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: Section 2.4.2. Corporate Governance Committee, paragraph f) Functions of the Corporate Governance Committee. Regarding senior management, section III. Good governance policies, A. Management Policies, 4. Senior Management, and 4.3. Evaluation. Similarly, in paragraph g of article 42 of the ES						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	01/30/2013					
Date of Modification:	12/12/2019					

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24.6. The Entity has a clear policy for remuneration of the Chairman and the other members of Senior Management, approved by the Board of Directors. It identifies all the remunerations components that can be met, subjected to the long-term objectives and risk levels.

24.6 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: At Findeter there is a remuneration policy subject directly to the accomplishment of the strategic goals of the company. Its name is Strategic Variable Remuneration (RVE), approved by the Board of Directors in accordance with the literal g) of the Article 42, Functions of the Board of Directors, of the current bylaws that covers the Chairman and the Senior Management.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	05/28/2013					
Date of Modification:	05/28/2013					

24.7. If the remuneration of the Chairman includes one fixed component and one variable, its technical design and calculation **keeps the variable component from overcoming the maximum limit established by the Board of Directors**.

24.7 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The retribution of the Chairman consists of a fixed part and a variable part. The variable part corresponds to the definition of the RVE policy, approved by Findeter's Board of Directors valid since 2013, paid once a year in accordance with the accomplishment of the corporative strategic goals. Good Governance Code, Chapter III (3.5)						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						

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Date of Implementation:	05/28/2013
Date of Modification:	05/28/2013

III. CONTROL ARCHITECTURE

Action No. 25: Control Environment

25.1. The board of directors is the ultimate responsible for the existence of a single control environment in the Entity, adapted to its nature, size, complexity and risks to comply with the budgets stated in recommendation 25.1.

25.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: Article 42, paragraphs aa), bb) and cc) of the Bylaws, and additionally through the three lines described in Annex 2, Paragraph M, functions of the Board of Directors, functions regarding control activities. In accordance with Chapter III, Paragraph b), numeral 1 of the Code of Good Governance, the improvement of communications in risk management is facilitated, as well as its control to ensure the adequate result of management-related initiatives. Its articulation guarantees that controls are executed, complemented, monitored and evaluated independently in order to achieve compliance with the entity's strategic objectives. Additionally, there is the Audit Committee of the Board of Directors that supports the control and improvement of the entity's Internal Control System.						

Article 42, paragraphs aa), bb) and cc) of the Bylaws, and

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additionally through the three lines described in Annex 2, Paragraph M, functions of the Board of Directors, functions regarding control activities. In accordance with Chapter III, Paragraph b), numeral 1 of the Code of Good Governance, the improvement of communications in risk management is facilitated, as well as its control to ensure the adequate result of management-related initiatives. Its articulation guarantees that controls are executed, complemented, monitored and evaluated

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	independently in order to achieve compliance with the entity's strategic objectives. Additionally, there is the Audit Committee of the Board of Directors that supports the control and improvement of the entity's Internal Control System.
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	02/18/2003
Date of Modification:	11/12/2020

25.2. In the case of Conglomerates, the Board of Directors of the Parent company **supports the existence of a Control Architecture with a consolidated**, formal scope that reaches all the subordinate companies. This to stablish responsibilities regarding the policies and guidelines on the matter at the conglomerate level and defining clear report guidelines that allow both an integrated vision of the risks the Conglomerate faces and the use of control Actions.

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25.2 Action implemented	YES	☐	NO	☐	N.A.	☒
YES Please						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation: Grupo Bicentenario S.A.S., in accordance with its creation norm, Decree Law 2111 of 2019, has administrative bodies such as the Board of Directors and the Shareholders' Assembly; Likewise, Findeter is part of the Bicentenario S.A.S. economic group, in terms of the participation of the parent, it is part of the general shareholders' meeting as the majority shareholder of Findeter, in turn participates in the selection of the members of the Board Directive; Findeter continues with its administration and control bodies with the participation of Grupo Bicentenario.						
Date of Implementation:						
Date of Modification:						

Action No. 26: Risk management

26.1. In the Entity, the Risk Management goals are those contemplated in the recommendation 26.1.

26.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
The Objective of the Risk Management Process is to establish, implement and maintain the Risk Management System, in accordance with the policies established by the Board of Directors and that comply with current regulations. For this, procedures were defined, in which the activities, policies or conditions, controls, and formats for the management of the different risks to which the entity is exposed are established. The results of risk management are reported monthly to the Board of Directors, which are documented in the respective Minutes and which are previously discussed in the GAP Committee for Asset and Liability Management where members of the Board of Directors participate.						

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NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	02/10/2004
Date of Modification:	02/10/2004

26.2. The society has a *risk map*, a tool used to identify and track the financial and non-financial risks to which it is exposed.

26.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The entity has a technological tool (BINAPS) through which the risk map for each of the entity's processes is managed, both individually and in a consolidated manner. The Comprehensive Risk Management System (SIAR) manual documents the policies, organizational structure, roles and responsibilities, and methodologies for creating risk maps.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	02/10/2004					
Date of Modification:	02/10/2004					

26.3. The Board of Directors is in charge of defining a policy of risks management as well as establishing maximum exposition limits for each identified risk.

26.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The Social Bylaws on article 42 shows the functions of the Board of Directors. On the literal aa) establishes its function: <i>"to define the policies for the design and implementation of risk administration systems for the Entity and to adopt the necessary Actions to strengthen them in those aspects that require improvement..."</i> Furthermore, this policy is stated in the Good Governance Code, Appendix II, as a function of the Board of Directors.						
NO. Explain:						

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N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	12/18/2008
Date of Modification:	15/01/2019

26.4. The Board of Directors knows and supervises periodically the effective exposition of the Entity to the maximum defined risk limits and proposes corrective and tracking actions in case of deviations.

26.4 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The control of both financial and non-financial risks is through methodologies to assess and track them so they remain within the limits established by the Board of Directors. These are presented and registered through the correspondent minutes. The Management Systems of each risk registers the methodologies.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	02/10/2004					
Date of Modification:	02/10/2004					

26.5. In the framework of the risk administration policy, the Senior Management is the owner of the processes and is responsible for the risk administration, i.e., to identify, assess, measure, control, supervise and report the risks, defining methodologies and ensuring that the risk management is consistent with the strategy, the defined risk policy and approved maximum limits.

26.5 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: In the Good Governance Code in the Management Policies, there are the Risk Management Policies that indicate: that it must have an efficient Risk Management System that facilitates decision-making in accordance with the risk profile defined by Senior Management and that it adjusts to the needs of the Administration and legal requirements. The first line of risk control, in accordance with the provisions of the SFC, are						

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the areas in charge of identifying and controlling risks together with the monitoring of the second line (Risk Area) in compliance with the provisions of the standard.	
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	02/10/2004
Date of Modification:	28/11/2017

26.6. The Entity has a policy of risk delegation, approved by the Board of Directors, which establishes the risk limits that each level in the entity can manage.

26.6 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
Within its corporate structure, FINDETER has a Vice-presidency of Risks that is in charge of managing the risks that the entity faces, and proposes limits of exposition approved by the Board of Directors.						
Those responsible for the processes apply policies and directions fixed for the management of the different risks.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		02/10/2004				
Date of Modification:		28/11/2017				

26.7. In conglomerates, risk management must be done at a consolidated level so it helps to the adhesion and control of the companies that make it up.

26.7 Action implemented	YES	☐	NO	☐	N.A.	☒
YES Please provide a brief description:						
NO. Explain:						

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N.A. Please specify the rules preventing the adoption of this recommendation:	
Grupo Bicentenario S.A.S., in accordance with its creation norm, Decree Law 2111 of 2019, has administrative bodies such as the Board of Directors and the Shareholders' Assembly; Likewise, Findeter is part of the Bicentenario S.A.S. economic group, in terms of the participation of the parent, it is part of the general shareholders' meeting as the majority shareholder of Findeter, in turn participates in the selection of the members of the Board Directive; Findeter continues with its administration and control bodies with the participation of Grupo Bicentenario.	
Date of Implementation:	
Date of Modification:	

26.8. If the Entity has a complex and diverse structure of businesses and operations, **there is a position called Chief Risk Officer (CRO)** with power at conglomerate level if it is an integrated company in control of situations and/or company group.

26.8 Action implemented	YES	☐	NO	☐	N.A.	☒
YES Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation: Organizationally, FINDETER has the Vice Presidency of Risks. However it is important to clarify that Grupo Bicentenario S.A.S., in accordance with its creation norm, Decree Law 2111 of 2019, has administrative bodies such as the Board of Directors and the Shareholders' Assembly; Likewise, Findeter is part of the Bicentenario S.A.S. economic group, in terms of the participation of the parent, it is part of the general shareholders' meeting as the majority shareholder of Findeter, in turn participates in the selection of the members of the Board Directive; Findeter continues with its administration and control bodies with the participation of Grupo Bicentenario.						

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Date of Implementation:	
Date of Modification:	

Action No. 27: Control Activities

27.1. The Board of Directors is in charge of looking after the existence of an appropriate internal control system, adapted to the Entity and its complexity, and consistent with the current risk management.

27.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The Board of Directors has the necessary information for the monitoring, tracking and improvement of the Internal Control System (SCI) as well as the process used to check its effectiveness and the aspects related to the risk management This function is on the Statutes, Article 42, literal bb) and in the Good Governance Code, Appendix II, Section M						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	02/18/2003					
Date of Modification:	12/12/2019					

27.2. The Board of Directors is in charge of supervising the efficacy and suitability of the Internal Control System, which could be delegated to the Audit Committee, without losing its responsibility of supervision.

27.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES. Specify briefly: The Board of Directors supervises the SCI as well as the efficacy and suitability, through the Audit Committee and the reports submitted by the Bureau of Internal Control and the management areas. This function is on the Statutes, Article 41, literal bb) and in the Good Governance Code, Appendix II, Section M						
NO. Explain:						

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N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	02/18/2003
Date of Modification:	12/12/2019

27.3 Findeter applies and demands the principle of self-control. The definition of it is “the capacity people have to participate in the different processes to consider the control as an inherent part of their responsibilities, action field and decision making”.

27.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
It is included In the Good Governance Code Section B (2). Furthermore, the Internal Control Office does activities aimed to strengthen and promote self-control						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		11/13/2001				
Date of Modification:		12/12/2019				

Action No. 28: Information and communication.

28.1 In the Entity, the communication of culture, philosophy, and risk policies is downward and horizontal. In addition to the approved exposition limits, so the whole organization considers the risks and activities of control on their function.

28.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
The reporting mechanisms to the aforementioned instances are the Risk and GAP Committees (Management of Administrative Assets and Liabilities) and the GAP Committee to support the Board of Directors, who have an established periodicity and communicate it downwards and horizontally to the entire Entity.						
NO. Explain:						

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N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	02/10/2004
Date of Modification:	04/11/2013

28.2. In the Entity **there is a mechanism to report the information upwardly** (to the Board of Directors and the Senior Management). This is true, clear, and complete, so it supports and allows a good decision-making process, the risk management, and the control.

28.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
Through the Vice-Presidency of Risks, and the Compliance Officer, the risk management reports are delivered in a timely manner in accordance with the norms. This allows this collegial institution and the Senior management to keep up to date and make accurate decisions.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	02/10/2004					
Date of Modification:	28/11/2017					

28.3. The **communications and information report mechanisms** of the Entity allow: i) The senior management to involve the whole Entity in the risk management and control definition, and ii) that the Entity staff understands their role on the risk management and identification of controls, as well as their individual contribution in relation to their coworkers.

28.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
In the creation of the risk map for each process the collaborators participate in the identification of their risks and mitigations mechanisms (controls) for each one of them. This and in accordance with the current methodology. Furthermore, the Entity trains its employees annually on operative risk and money laundering and terrorist financing. This aims to raise their awareness of the benefits, at a personal and corporate level, of good management.						

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NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	02/10/2004
Date of Modification:	02/10/2004

28.4. There are alternative lines of anonym complaints or “*whistleblower*” that allow the employees to communicate illegal or unethical behavior that may go against the culture of risk management and society controls. The Board of Directors of the Entity gets a report of these complaints.

28.4 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: In the Good Governance Code, Section III. Establishes the procedure for the internal line of anonymous complaints in order that workers can anonymously communicate illegal or unethical behavior or that may contravene the culture of risk management and controls to Findeter.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		12/15/2015				
Date of Modification:		12/12/2019				

Action No. 29: Supervision of Control Architecture

29.1. In the Entity, the Board of Directors, through the Audit Committee, is in charge of supervising the effectiveness of the different components of the Control Architecture.

29.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The Board of Directors has the necessary information for the supervision, tracking, and improvement of the SCI. It has also the process used to review its effectiveness and the aspects related to risk management. The Code of Good Governance states that the aim of the Audit Committee is to supervise the effectiveness the Entity's Internal Control System.						

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NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	18/02/2003
Date of Modification:	02/15/2008

29.2. In the Entity, the supervision work aimed to provide assurance about the Control Architecture efficiency involves the internal audit along with the statutory auditor. He reviews the matters within his competence and particularly in relation to the financial information generated by the Entity.

29.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
Available at the Good Governance Code, Section 2 (2.4.1.1). Functions of the Audit Committee where it is indicated in Letter b " <i>Supervise the functions and activities of the internal audit, in order to determine its independence and objectivity in relation to the activities it audits, determine the existence of limitations that prevent its adequate performance and verify if the scope of its work meets the control needs of the Entity</i> "						
Likewise, the Statutory Auditor through its audits evaluates the internal control system.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		18/02/2003				
Date of Modification:		12/12/2019				

29.3. The function of internal audits in the Entity has an internal audit bylaw, approved by the Audit Committee. This bylaw shows the scope of the functions and also includes the topics noted in the recommendation 29.3

29.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
Findeter has the implementation of the Internal Audit Management Statute, which was presented to the Audit Committee of the Board of						

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Directors since November 29, 2016 and approved in the session of January 24, 2017, with its modifications approved on 20 October 2020 and September 20, 2022. Likewise, the Audit Committee acts based on Internal Circulars with the last modification contained in Circular 05 of June 2023, in accordance with the provisions of External Circular 029 of 2014 of the Financial Superintendence of Colombia and the Code of Good Governance. The Audit Committee performs functions of supervision, monitoring and improvement of the Internal Control System-ICS, according to the policies given in recommendation 29.3, the committee is made up of four members of the Board of Directors, meets at least every two months or with more frequency when warranted by the results of the evaluations of the Internal Control System or when deficiencies are detected in it that require evaluation and urgent corrections or when there are significant changes in the policies of the Entity or in the regulations that regulate the operations. The Head of the Internal Management Control Office acts as technical secretary of the committee. Additionally, the Entity has an Internal Control Office (by legal provision), with two (2) procedures defined and published in the SGI tool used for the execution of internal management audits and SGI audits. Finally, the functions or responsibilities of the Internal Control Office are defined in the Good Governance Code, the Audit Statute and the Entity's Functions Manual.	
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	11/20/2003
Date of Modification:	28/06/2018

29.4. The ultimate responsible for the internal audit has a relationship of professional autonomy with the Senior Management of the Entity, or the conglomerate that hires them, through its exclusive functional dependency from the Audit Committee.

29.4 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The President of the Republic appoints FINDETER's Chief of Internal Control. This ensures the autonomy of their functions. Likewise, the Audit Committee supervises Findeter's internal control structure.						
NO. Explain:						

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N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	11/29/1993
Date of Modification:	07/12/2011

29.5. The Board of Directors is in charge of the appointment and dismissal of the internal audit responsible after a suggestion by the Audit Committee. Their dismissal or resignation is communicated to the market.

29.5 Action implemented	YES	☐	NO	☐	N.A.	☒
YES Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
The President of the Republic is responsible for the appointment or dismissal FINDETER's Chief of Internal Control, according to the Act 1474 of 2011, Article 9.						
Date of Implementation:						
Date of Modification:						

29.6. The Statutory auditor has a clear autonomy; the respective report from the audit has to state this condition.

29.6 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
The General Shareholders Meeting elects the Statutory auditor and has administrative and legal autonomy in relation to Findeter. The tax inspector's designation, period, independency, staff, functions, and reports are regulated on Chapter 49 of the bylaws. In the same way in the Code of Good Governance Chapter III, Literal B., numeral 3.3 Statutory Auditor.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		05/14/1990				
Date of Modification:		28/11/2017				

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29.7. If the Entity acts as parent of a conglomerate, **the Statutory auditor is the same for all the companies, included those offshore.**

29.7 Action implemented	YES	☐	NO	☐	N.A.	☒
YES Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation: Grupo Bicentenario S.A.S., in accordance with its creation norm, Decree Law 2111 of 2019, has administrative bodies such as the Board of Directors and the Shareholders' Assembly; Likewise, Findeter is part of the Bicentenario S.A.S. economic group, in terms of the participation of the parent, it is part of the general shareholders' meeting as the majority shareholder of Findeter, in turn participates in the selection of the members of the Board Directive; Findeter continues with its administration and control bodies with the participation of Grupo Bicentenario.						
Date of Implementation:						
Date of Modification:						

29.8. The Entity has a policy for the designation of the statutory auditor, approved by the Board of Directors and shared among the shareholders. Here appear the provisions established in the recommendation 29.8.

29.8 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
Articles 49 to 54 of the current bylaws establish the designation and period of the statutory auditor. Likewise, Procurement manual guidelines of Findeter includes specific conditions the contracting the statutory auditor. In the same way in the Code of Good Governance Chapter III, Literal B., numeral 3.3 Statutory Auditor.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						

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Date of Implementation:	05/14/1990
Date of Modification:	12/12/2019

29.9. The Entity establishes a maximum contracting deadline between five (5) and ten (10) years in order to avoid a connection excess between the Entity and the Auditing company and maintain the autonomy. In the case of statutory auditing, **natural person untied to a company, the contracting deadline is five (5) years maximum.**

29.9 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
According with Article 48 of the current bylaws "Designation and period", the period of the statutory auditing is 2 years and can face reelection for one additional period. In the same way in the Code of Good Governance Chapter III, Literal B., numeral 3.3 Statutory Auditor.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	01/31/2013					
Date of Modification:	12/12/2019					

29.10. The Entity promotes, in the middle of the period, the change of the designated associate from the statutory auditing company and their teams. At the end of the period, a new company must be contracted. This is mandatory.

29.10 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
It is included in the Good Governance Code, Chapter III (B) (3.3.1)						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						

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Date of Implementation:	30/11/2012
Date of Modification:	12/12/2019

29.11. The Entity prohibits the contracting of the statutory auditor for services different to those related to the financial audit and other functions recognized in the current regulation. This prohibition is also current for people or entities linked to the statutory auditing company. These include the group's companies, as well as companies with an overlapping of associates and/or executives with the tax inspection company.

29.11 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: In the literals j, k and l of numeral 8.1. Hiring procedure, specific conditions of open calls, the guidelines for hiring the Statutory Auditor are included. Since the type of contract for the selection of the Statutory Auditor must be governed by the Policy for Procurement of Goods and Services CON-DA-001 V1, the regime of disqualifications and incompatibilities contained in number 5 on policies and conditions of operation is applied. of the same document. Additionally, the appointment procedure is found in chapter III, literal B INTERNAL CONTROL MECHANISMS, from numeral 3.3.1 to 3.3.6. Tax inspection. Additionally, the contract minutes establish a clause on disqualifications and incompatibilities contemplated in article 8 of Law 80 of 1993, article 18 of Law 1150 of 2007, and articles 1 and 4 of Law 1474 of 2011.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	30/11/2012					
Date of Modification:	19/09/2018					

29.12. The Entity discloses the total amount of the contract with the statutory auditor as well as the proportion that the paid fees represent to the entity in comparison with its total income related to the statutory auditing activity.

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29.12 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: The Entity's Web page shows all the statutory auditing contracting process included the amount of fees agreed upon on the contract						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		01/01/1998				
Date of Modification:		01/01/2015				

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V. FINANCIAL AND NON-FINANCIAL DISCLOSURE AND INFORMATION

Action No. 30: Disclosure of information Policy

30.1. The **Board of Directors** has approved a disclosure information policy where the information about the recommendation can be identified.

30.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: Included in the Good Governance Code, Chapter III (C) (9.1). Information Disclosure Policy of the Code of Good Governance.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	30/11/2012					
Date of Modification:	12/12/2019					

30.2. In the case of conglomerates, the information disclosure to third parties is integral and transversal. This information, regarding the group of companies, allows the third parties to have a funded opinion on the reality, organization, complexity, activity, size, and the conglomerate's governance model.

30.2 Action implemented	YES	☐	NO	☐	N.A.	☒
YES Please provide a brief description:						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation: Grupo Bicentenario S.A.S., in accordance with its creation rule, Decree Law 2111 of 2019, has administrative bodies such as the Board of Directors and the Shareholders' Meeting; Likewise, Findeter is part of the economic group Bicentenario S.A.S., in terms of the participation of the controlling company, it is part of the general meeting of shareholders as the majority shareholder of Findeter, and in turn participates in the selection of the members of the Board. Directive; Findeter continues with its administration and control bodies with the participation of the Grupo Bicentenario.						

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Date of Implementation:	
Date of Modification:	

Action No. 31: Financial Statements

31.1. The General Shareholder Meeting, preceded by the president of the Audit Committee, will discuss **any exceptions in the statutory auditor's report** and the actions proposed by the Entity to solve the situation

31.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: In this case, the General Shareholders meeting would be informed and the necessary correctives would be applied. Literals f) and g) of Article 32 of the Social Bylaws.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	14/05/1990					
Date of Modification:	15/01/2019					

31.2. When **the Board of Directors considers that it must keep its own criterion regarding the exceptions** and/or emphasis of the statutory auditor, this standing **must be explained and justified in a written report given to the General Assembly**. This report should sum up the content and scope of the divergence.

31.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						

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Article 52 of the Bylaws, in accordance with Article 213 of Code of Commerce, compels the statutory auditor to comply with the other legal attributions. These establish that the statutory auditor will be entitled to participate in the discussions of the Assembly or Members' General Meeting, and in the Board of Directors' meeting or Administration Councils. Therefore, the Board of Directors and the statutory auditor have the opportunity to explain their criteria before the Shareholders General Assembly.	
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	31/01/2013
Date of Modification:	15/01/2019

31.3 The public financial information reports on the offshore operations and includes details on the operations made with or between Affiliate Parties. This information includes the operations made between the Conglomerate's companies qualified, through objective parameters such as the operation volume, assets percentage, sales or others, as material by the Entity.

31.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: In the Notes to the Financial Statements of Findeter, in the section - Operations with related parties- the entity refers to all the operations of this type that are carried out within the Financial Institution.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:						
Date of Modification:						

Action No. 32: Information for markets

32.1. In the framework of the disclosure information policy, the Board of Directors (or the Audit Committee), **adopts the necessary actions to guarantee the transmission to the financial and capital markets of all the financial and non-financial information about the Entity** demanded by the current regulation. Also, all that information considered relevant for investors and clients.

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32.1 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: Available at the Good Governance Code, Chapter II (C) (9.1). Furthermore, Findeter has a financial information channel with investors and the general public on the following link: https://www.findeter.gov.co/relaci%C3%B3n-con-inversionistas .						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	30/11/2012					
Date of Modification:	28/11/2017					

32.2. The Entity's web page has a user-friendly interface, so it is very easy for the user to access the information related to the Corporate Government.

32.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: Findeter has the Issuer-IR seal awarded by the Colombian Stock Exchange, which identifies us as one of the entities with the best information disclosure and Investor Relations policies. One of the requirements to obtain this recognition is to have a						

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website in English and Spanish with the financial and non-financial information available. Available at the section of Relationship with investors: https://www.findeter.gov.co/relaci%C3%B3n-con-inversionistas /	
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	01/01/1998
Date of Modification:	28/11/2017

32.3. The Entity's webpage includes the links regarding to this recommendation

32.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: Yes, Findeter has the Issuers-IR seal granted by the Colombian Stock Exchange, which identifies us as one of the entities with the best information disclosure and investor relations policies. What is established in recommendation 32.3 It is found in the Investor Relations section, link: https://www.findeter.gov.co/relaci%C3%B3n-con-inversionistas						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:	01/01/1998					
Date of Modification:	28/11/2017					

32.4. The basis to communicate information to the markets that the Entity uses in general are **documents that can be printed, downloaded and shared.**

32.4 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						

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In the web page of Findeter, Investor Relations link, financial and non-financial supports aimed at market investors are available, in downloadable version and for printing.	
NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	01/01/1998
Date of Modification:	01/01/2015

32.5. The Entity as a big and complex company, publishes annually on the web page a **report explaining the Control Architecture organization, methods, and procedures** implemented. The later with the aim of providing financial and non-financial information that is accurate and safe, and protecting the assets of the entity, and the efficiency and security of its operations. A Risk Management report complements the information.

32.5 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description:						
On the web page: https://www.findeter.gov.co/transparencia-y-acceso-a-la-informacion-publica/informes-de-gestion-evaluacion-y-auditoria#cont are published the evaluation and the reports of the Internal Control System.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		01/01/1998				
Date of Modification:		01/01/2015				

Action No. 33: Annual Corporate Governance Report

33.1. The Entity prepares annually a Corporate Governance Report. The Board of Directors is in charge of its content after a review by the Audit Committee, submitted with the rest of documents upon closing of the financial year.

33.1 Action implemented	YES	☒	NO	☐	N.A.	☐
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COLOMBIAN FINANCIAL SUPERINTENDENCE

YES Please provide a brief description: A section of the Annual Management and Sustainability report is included. NO. Explain:	
N.A. Please specify the rules preventing the adoption of this recommendation:	
Date of Implementation:	13/11/2001
Date of Modification:	15/12/2015

33.2. The Entity's Annual Corporate Governance Report is not only a transcription of the regulations of Corporate governance included on the bylaws, internal regulations, codes of good governance or other Entity documents. Its aim is to explain the reality of its function and the relevant changes during the financial year, not to describe the governance model of the Entity.

33.2 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Please provide a brief description: Available at a section of the Annual Management and Sustainability report. The Corporate Governance Report includes the achievements of the financial year about certifications regarding quality; the incorporations of new policies that guarantee the higher ethical conditions among the executives, public servants, clients, providers and other interested parts; and the reforms, updates and contracts related to the topic. NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		13/11/2001				
Date of Modification:		15/12/2015				

33.3. The Entity's Annual Corporate Governance Report, at the end of the financial year, has information that **describes how the Entity followed and adopted the government recommendations. It also includes the main changes made.**

The structure of the Entity's Annual Corporate Governance Report is in line with the scheme stated in the recommendation 33.3.

COLOMBIAN FINANCIAL SUPERINTENDENCE

33.3 Action implemented	YES	☒	NO	☐	N.A.	☐
YES Specify briefly: to check in accordance with the Action The Annual Management report includes the Annual Corporate Governance and Sustainability Report. It also includes the aforementioned structure in the recommendations 33.3.						
NO. Explain:						
N.A. Please specify the rules preventing the adoption of this recommendation:						
Date of Implementation:		13/11/2013				
Date of Modification:		28/11/2017				