



CODE OF ETHICS AND INTEGRITY

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1. Presentation

The Code of Ethics and Integrity is a vital tool for FINDETER. In it, the principles and ethical commitments that govern the actions of the directors and workers of the Entity are expressed for the different interest groups and the country in general.

These rules of conduct denote the interest and responsibility that each of the members of this company has with the fulfillment of its functions and actions, which transcend beyond legality and that seek to generate transparency, trust, credibility, sense of belonging, respect, among other values and, likewise, this behavior allows us to demand from citizens and our interest groups, in particular, the performance of actions in accordance with our rules of conduct, when they intend to interact with FINDETER.

Our Code of Ethics and Integrity is based on international and local standards around the best practices of corporate governance, and in particular, refers to standards such as the OECD

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Anti-Corruption Ethics and Compliance Manual, World Bank, UNODC, Anti-Corruption Statute of Colombia, Issuer Program with IR Certificate of the Colombian Stock Exchange, Code of Ethics of the ASOBANCARIA member Entities and the Anti-Corruption Active Companies Program of the Secretariat of Transparency of the Presidency of the Republic.

2. Anti-fraud and anti-corruption policy statement

FINDETER, through its Board of Directors, president, executives and collaborators, does not tolerate fraud or corruption, or any type of acts that constitute their findings.

FINDETER, expresses its firm and permanent purpose of adopting the necessary processes, procedures, controls, mechanisms and tools that allow it to carry out due diligence in the prevention, detection, investigation and response, against fraud and corruption.

All levels of FINDETER are obliged to adopt the structure, roles and responsibilities described here, as well as to apply the Anti-Fraud and Corruption Policy and Program and to its monitoring. In the event of non-compliance, the sanctions will be applied to their contempt, without exception.

The actions related to fraud and corruption behaviors can be informed through the email created for this purpose: denuncias@Findeter.gov.co or the telephone line 018000116622.

3. Values and associated behaviors

The Managers and workers of FINDETER assume and commit to the values of the Financiera, as described below¹:

EQUIVALENCE BETWEEN THE VALUES OF FINDETER'S STRATEGIC PLAN AND THE INTEGRITY CODE

<i>STRATEGIC PLAN VALUES</i>	<i>INTEGRITY CODE VALUES⁽¹⁾</i>
<i>Integrity</i>	<i>Honesty + Justice</i>
<i>Respect</i>	<i>Respect</i>
<i>Commitment</i>	<i>Commitment + Diligence</i>

¹ De acuerdo al documento “Valores del Servicio Público – Código de Integridad” del Departamento Administrativo de la Función Pública – DAFP de julio de 2017, se realizaron las siguientes equivalencias entre los valores de Findeter y los establecidos en dicho documento así: nuestro valor de Integridad con Honestidad y Justicia; y nuestros valores de Compromiso y Vocación de Servicio con Compromiso y Diligencia.

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<i>Service vocation</i>	
<i>Teamwork</i>	
<i>Innovation</i>	
<i>Transparency</i>	

a. INTEGRITY

We always act based on **honesty, justice, truth**, fulfilling our duties with transparency and rectitude, always favoring the general interest. We act impartially guaranteeing the rights of people, with equity, equality and without discrimination. We are consistent between what we think, feel and do.

What is done:

- We always tell the truth, even when we make mistakes, because it is human to make them, but it is not right to hide them.
- When we have doubts regarding the fulfillment of our duties, we seek guidance in the pertinent instances within our Entity. It is worth not knowing everything, and it is also worth asking for help.
- We facilitate access to complete, truthful, timely and understandable public information through the means intended for it.
- We denounce the faults, crimes or violation of rights of which we have knowledge in the exercise of our charges, always.
- We support and promote participation spaces so that citizens are part of the decision-making that affects them related to our work.
- We make decisions establishing mechanisms for dialogue and consultation with all parties involved.
- We act ethically, without receiving bribes, telling lies or giving wrong information.
- We make informed and objective decisions based on reliable evidence and data. It is very serious to fail our actions for not having things clear.
- We recognize and protect the rights of each person according to their needs and conditions.
- We apply the same criteria to similar situations
- We fulfill what we say.
- We treat all customers equally, without distinction.
- We take responsibility for our actions.
- We promote professional development opportunities within the Entity, based on objective selection processes.

What is not done:

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- We do not give preferential treatment to Entities, their managers, workers or close people, to favor them in any type of process.
- We do not accept incentives, favors, or any other kind of benefit offered by people or groups that are interested in a decision-making process.
- We do not use the Entity's resources for personal purposes related to our family members, studies and hobbies (this includes the time of our working day, the elements and assets assigned to fulfill our work, among others).
- We are not careless with the information in our charge, nor with its management.
- We do not promote or execute policies, programs or measures that affect equality and freedom of persons.
- We do not favor the point of view of an interest group without taking into account all the actors involved in a situation.
- We never allow hatreds, sympathies, dislikes, whims, pressures or interests of a personal or group order to interfere with our criteria, decision making and management of the Entity.

b. RESPECT

We recognize, value and treat all people with dignity, regardless of race, gender, sexual orientation and political affinity, with their virtues and defects, regardless of their work, origin, titles or any other condition.

What is done:

- We are open to dialogue and understanding despite perspectives and opinions different from ours. There is nothing that cannot be solved by speaking and listening to others.
- In meetings we listen to someone's opinion or presentation, without distractions such as the computer or cell phone.
- We attend with kindness, equality and fairness to all people in any situation through our words, gestures and attitudes, regardless of their social, economic, religious, ethnic or any other order.
- We are punctual and respect other people's time.
- We give our opinion in a respectful way, without shouting or bad words and with clear arguments.
- We are kind everyday.

What is not done:

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- We never act in a discriminatory, rude or hurtful manner, under any circumstances.
- We never base our decisions on assumptions, stereotypes or prejudices.
- We do not attack, ignore or mistreat citizens or our partners in any way.

c. COMMITMENT

We are aware of the importance of our role as FINDETER workers and we are willing and **diligent** to understand and resolve the needs of the people with whom we interact in our daily work. We do our best and act responsibly in the use of FINDETER resources.

What is done:

- We assume our role as FINDETER workers, understanding the value of the commitments and responsibilities we have acquired against the country.
- We are always willing to put ourselves in people's shoes. Understanding their context, needs and requirements is the foundation of our service and work.
- We listen, attend and guide anyone who needs any information or guidance in any matter of the Entity.
- We provide an agile, friendly and quality service.
- We speak well of FINDETER inside and outside the organization
- We timely deliver the assigned works with quality.
- We comply and actively participate in FINDETER activities.
- We use FINDETER resources responsibly to fulfill our obligations. The public belongs to everyone and is not wasted.
- We provide respectful and timely feedback to coworkers and bosses.

What is not done:

- We do not work with a negative attitude, we do our best.
- We do not think that our work is a "favor", it is a commitment and a pride.
- We do not assume that our work is irrelevant to society.
- We never ignore a citizen and his concerns.

d. TEAM WORK

We join efforts to achieve common objectives, fulfilling the duties, functions and responsibilities assigned with attention, promptness and efficiency, in order to optimize the use of resources.

What is done:

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- We comply with the stipulated times for the achievement of each labor obligation. After all, everyone's time is money.
- We guarantee the quality in each of the products we deliver. We are always proactive to continuously improve our work.
- We contribute ideas and share knowledge.
- We comply with the agreements we make with our partners.
- We ask for help and rely on others.
- We recognize the merits of our partners.
- We plan our activities taking into account those involved.
- We foster trust within the work team, to allow an environment of collaboration, commitment and mutual growth.

What is not done:

- We do not waste other people's time.
- We do not work individually but collectively in search of a common goal.
- We do not criticize the work of others. We value the contribution of our partners.
- We do not allow trust to be lost in the work group, we always support the development and well-being of all.

e. SERVICE VOCATION

We understand and meet the needs and expectations of our Interest Groups.

What is done:

- We timely and truthfully deliver the information required by our stakeholders.
- We listen and identify the needs of our Interest Groups.
- We verify that the service provided meets the needs and expectations.
- From our function we understand who is the client of FINDETER and we guide our daily work to your satisfaction.
- We are kind to our Interest Groups inside and outside the Entity.
- We have a service vocation, with a view to customer satisfaction.

What is not done:

- We do not ignore the value of the commitments and responsibilities acquired against the country in our role as FINDETER workers.
- We never ignore the needs and work of our partners.

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- Not being willing to listen, attend and guide anyone who needs any information or guidance on a FINDETER issue.
- We do not stop providing an agile, friendly and quality service.
- We do not stop addressing the concerns and needs of our customers.

f. INNOVATION

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

What is done:

- In the face of new ideas we do not oppose but propose.
- We participate in the ideas generation exercises for new projects. We adapt to the changes that are proposed with a positive and open-minded attitude.
- We investigate and propose new practices to renew our processes and services
- We promote innovation as a mechanism for generating value for the Entity.

What is not done:

- We do not restrict the communication of workers' ideas.
- We ignore the problems and opportunities detected
- We do not inhibit or restrict the creativity of workers.
- We do not restrict the mechanisms of expression of collaborators.

g. TRANSPARENCY

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

What is done:

- We act with honesty in the exercise of our daily work
- We carry out hiring processes with equal opportunities
- We publish our management and sustainability report for the knowledge of interest groups
- We listen to our interest groups and build as an entity based on their needs
- We have our public information on the entity's website for open consultation.
- We build relationships of trust with our allies.

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What is not done:

- We do not lie in the development of our work
- We do not hide our management information that is of value to our stakeholders
- We do not limit or favor the hiring of specific actors or entities
- We do not accept dishonesty in our collaborators.

4. Ethical principles

- We act according to established institutional values.
- We make FINDETER a solid, profitable and sustainable Entity, for the development of the country.
- We act with the philosophy of continuous improvement.
- We make general interest prevail over private interest.
- We work as a team promoting active participation.
- We promote and foster the improvement of the quality of life of workers.
- We know and apply the legal provisions that govern the activities of the Entity.
- We manage Findeter resources correctly and effectively.

5. Ethical guidelines

The ethical guidelines contained in this Code are guidelines on how FINDETER and its managers and workers should relate to the stakeholders, achieving coherence between ethical principles, established values and good institutional practices. In accordance with the above, the different levels of the Entity are committed to the following guidelines:

5.1. Executives

- Considering the responsibility derived from ethical leadership, FINDETER managers must:
- Promote within the Entity ethical values.
- Permanently lead actions that foster an organizational culture in accordance with the guidelines set forth in this code.
- Generate channels that allow communication between the different dependencies and the hierarchical levels of the Entity.
- Foster a culture of transparency in contracting processes, in order to establish a relationship with contractors and suppliers based on institutional values.
- To strive to establish mechanisms to strengthen citizen participation and human rights.

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- Give an example of the applicability of the ethical principles of this code, both in internal and external relations and in actions against third parties.
- Constantly observe compliance with this code.
- Promote the importance of compliance with this code among the workers in charge.

5.2. Team leaders

Taking into account the importance and responsibility of FINDETER leaders, they should observe, at a minimum, the following aspects:

- To fulfill their responsibilities inside and outside FINDETER, under the precepts of this code, being an example of action for the other workers of the Entity and interest groups in general.
- Develop and evaluate the objectives, strategies and goals proposed in the Corporate Strategic Plan and its other plans, within the framework of the ethical principles and values assumed.
- Ensure that the objectives are clear to all members that make up a work team.
- To guide efforts in the integral development of the workers in their charge, achieving maximum efficiency, exalting the sense of belonging and seeking excellence in their performance.
- Efficiently use available resources and contribute with quality and control in the development of the objectives, strategies and goals of the Corporate Strategic Plan, for the benefit of institutional management and interest groups.
- Generate truthful, timely and adequate communication channels between the institutional hierarchical areas and levels and facilitate the access that workers will have to information on corporate management.
- Foster tolerance and respect for difference.
- Encourage transparency in contracting processes, in order to establish a relationship with contractors and suppliers based on institutional values.
- Periodically verify and feed back the application of this code by the workers in charge.

5.3. Workers

The behavior of the workers must always be framed in the responsibility of abiding by the ethical principles and values in the exercise of their functions and behaviors, which will be legitimized and identified by their efficiency and transparency with the different interest groups that interact with FINDETER.

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Taking into account the work performed by each worker in FINDETER, and in order to strengthen the ethical and corporate culture in accordance with this code, it must:

- Develop their functions by applying ethical principles and established values.
- Make rational use of the resources allocated for their good performance, avoiding their particular use, abuse and waste of them.
- Perform their position in favor of the process in which they participate, being aware of his contribution to the management of his area and that of the Entity as a whole, taking into account the functions and regulation in each case.
- Communicate to the respective instance those behaviors that deviate from this code.
- Contribute to maintaining an environment that strengthens the corporate and ethical culture through the day-to-day application of the ethical principles and values adopted.

6. Conflicts of Interest

We understand a conflict of interest as any situation or event of a permanent or sporadic nature in which the personal interests, direct or indirect, of the members of the Board of Directors, directors and workers of FINDETER are in opposition to those of the Entity, interfere with the duties that fall within its responsibility or lead them to act for motivations other than the correct fulfillment of their functions and responsibilities, unduly influencing the exercise of their functions and responsibilities as a director or worker of FINDETER

The conflict of interest can be:

Real: when a member of the Board of Directors, director or worker of FINDETER is already in a situation in which they must make a decision, but, within the framework of this, there is an interest outside the interests of Findeter that could influence the obligations as a director or worker of FINDETER. This is a current conflict.

Potential: when a member of the Board of Directors, director or worker of FINDETER has an interest unrelated to the interests of Findeter that could influence his obligations as a director or worker of FINDETER, but is not yet in that situation in which he must take a decision. However, this situation could occur in the future.

In all cases in which a member of the Board of Directors, Manager or employee of FINDETER considers that he or she is immersed in a conflict of interest, whether real or potential of a permanent or sporadic nature, it will be resolved as follows:

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Board Members

The members of the Board of Directors must always declare at the beginning of the Board of Directors session the existence of a possible conflict of interest regarding the topics to be discussed. This collegiate body will analyze the case presented by the member and decide whether or not the conflict of interest arises, regardless of whether it is a real or potential conflict of a permanent or sporadic nature. The above applies equally to events in which the member of the Board of Directors has been challenged.

If the conflict of interest, whether real or potential, is sporadic in nature, the member will express it in the Board of Directors session when the topic on which the conflict is intended to be declared is going to be discussed. In that case, the other members will decide whether or not there are reasons for its declaration, requiring a simple majority of the votes participating in the vote.

In the event that the vote is in favor of the existence of a conflict of interest, the member must withdraw from the vote and withdraw from the session, and must, in turn, refrain from intervening directly or indirectly in the deliberations, activities, acts or decisions regarding which the conflict exists. The respective record will be left in the minutes of the meeting.

If the conflict of interest, whether real or potential, is permanent, the request for a declaration of conflict may be made in writing and duly motivated, or in the respective session of the Board of Directors. Acceptance of the request will require a simple majority of the votes participating in the deliberation. If, additionally, the Board of Directors considers that the situation affects all of the Entity's operations, the board member must resign from his position or, failing that, the Board of Directors may remove him from his position by communicating said decision in the corresponding session.

Managers and workers

Managers and workers to accept this Code must maintain the greatest objectivity, independence and knowledge in making their decisions, acting with ethics, good faith, transparency and in compliance with the Law.

- **Managers**

The conflict of interest that involves the President of the Entity, whether it comes from a

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declaration of impediment or a request for recusal, will be analyzed by the Corporate Governance Committee to determine the existence or not of the impediment and will be resolved by the Board of Directive. Conflicts of interest involving any of the other directors of the Entity will be analyzed by the General Secretariat of the Entity and decided by the Presidency in accordance with this Code. Conflict of interest cases of the General Secretariat will be analyzed and resolved by the Presidency. The same procedure will be followed if the conflict is known through a complaint from third parties or through recusal.

In any case, Directors must inform the Board of Directors of the direct and indirect relationships they maintain among themselves, or with FINDETER or with suppliers, or with any interest group that could lead to a conflict of interest.

- **Workers**

Conflicts of interest between workers of the Entity or between workers and third parties, due to decisions or procedures that are related to their own activities, whether coming from a declaration of impediment or a request for recusal, will be exposed to the Institutional Management and Performance Committee, so that it can rule on the existence or not of the conflict of interest. Said Committee will adopt the measures it deems appropriate.

In any case, workers must inform the Institutional Management and Performance Committee of the direct and indirect relationships they maintain among themselves, or with FINDETER or with suppliers, or with any interest group that could lead to a conflict of interest.

Likewise, if a worker or a third party is aware of a situation that may generate a conflict of interest, they must inform the Institutional Management and Performance Committee, presenting the background of the conflict.

It will be understood that there is a conflict of interest, among others, in the following events:

- When there is a degree of affinity or consanguinity between the director or worker of the Entity and the third party, which, in accordance with the Law, disqualifies or creates an impediment to contract or decide.
- When there is a relationship of association or participation in companies between managers or workers, or the manager or the worker and the third party.
- When there is some commercial or financial link of a personal nature between the manager or the worker and the third party.

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- When the manager or worker participates in activities, businesses or operations contrary to the interests of the Entity, or that may harm the fulfillment of their duties or responsibilities, or affect the good name of the Institution.

All cases consulted to the Corporate Governance Committee and the Institutional Management and Performance Committee must guarantee:

- Confidentiality in the analysis of situations or conflicts and in the responses.
- Objectivity in the analysis to provide the most appropriate response.
- Respect at all times for the rights of the people involved, their right to defense and due process.
- Decision within a period of no more than fifteen (15) days from the date on which the fact is known.

6.1. Duty to disclose conflicts of interest

The members of the Board of Directors, the President, General Secretary and Vice Presidents, and other employees of FINDETER must disclose any conflict between their personal interests and the interests of FINDETER, when dealing with allies, suppliers, contractors and any person who carries out or intends to execute business with the Financial Company or with companies in which it has participation or interest, directly or indirectly

6.2. General duty to abstain from incurring conflicts of interest of the entity

The president, members of the Board of Directors, Directors and all FINDETER workers must refrain from engaging in situations that imply a conflict of interest. Consequently, employees or administrators who are or believe they are involved in a situation that involves a conflict of interest must refrain from intervening, directly or indirectly, in the deliberations or decisions and other activities within the scope of their duties, with respect to the situation identified as conflict of interest.

All members of the Board of Directors, Directors and workers of Findeter will refrain from:

- Participate in activities, businesses or operations contrary to the law, the interests of the Entity or that may harm the fulfillment of their duties and responsibilities or affect the good name of FINDETER.
- Carry out any business or operation based on feelings of friendship or enmity.

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- Abuse your status as a member of the Board of Directors, Director or worker of FINDETER to obtain benefits, for yourself or for third parties, related to the products or services provided by Findeter or to obtain personal benefits from suppliers, contractors, allies or users.
- Carry out any operation that gives rise to a conflict of interest due to the privileged information to which it has access in the exercise of its functions.
- Use their position, authority or the information they know in the exercise of their position, confidential or not, to carry out any type of personal business or for the benefit of third parties, even within the year following their retirement from Findeter.
- Favor the interests of one ally to the detriment of the interests of another ally.
- Make improper use of Findeter's assets, giving them careless treatment or management according to their nature or allocating them to activities other than those of FINDETER.
- Omit the controls established in the procedures for knowledge of the ally for the purposes of the prevention and control of money laundering and financing of terrorism.
- Issue or present opinions or positions before third parties and before the media in relation to the matters under their responsibility or the activities carried out at FINDETER, unless you have express authorization to do so.
- • Carry out or cover up activities that are contrary to the law or ethics, or that may affect the image, good name and reputation of FINDETER.
- Failure to inform the Financial Institution about situations that may entail a conflict of interest, in the manner established in this title.”

6.3 Causes of conflict of interest

When the general interest of the public function conflicts with the particular and direct interest of the member of the Board of Directors, Director or worker of FINDETER, he or she must declare himself or herself impeded. Any worker or director of FINDETER who has a direct or indirect interest in Findeter's affairs may be challenged if he or she does not express his or her impediment due to:

1. Have a particular and direct interest in the regulation, management, control or decision of the matter, or have your spouse, partner or permanent companion, or any of your relatives within the fourth degree of consanguinity, second degree of affinity or first civil relationship, or your partner or partners, de facto or de jure.
2. The worker or director of FINDETER, his or her spouse, permanent partner or any of his or her relatives indicated in the preceding paragraph must have been aware of the matter on a previous occasion.

3. Be the worker or director of FINDETER, your spouse, permanent partner or one of your relatives indicated above, curator or guardian of a person interested in the matter.
4. Be one of the interested parties in the actions carried out by FINDETER: representative, agent, dependent, agent or administrator of the businesses of any member of the Board of Directors, Director or employee of FINDETER.
5. There is a dispute or controversy before administrative or jurisdictional authorities between the member of the Board of Directors, Director or employee of Findeter, his or her spouse, permanent partner, or any of his or her relatives indicated in section 1, and any of the parties interested in the action, your representative or attorney.
6. Any of the parties interested in the actions carried out by Findeter, its representative or attorney-in-fact, have filed a criminal complaint against the member of the Board of Directors, Director or worker of Findeter, their spouse, permanent partner, or relative up to the second degree of consanguinity, second of affinity or first civil, before initiating the administrative action, or after, provided that the complaint refers to facts unrelated to the action and that the accused is linked to the criminal investigation.
7. The member of the Board of Directors, Director or employee of Findeter, his or her spouse, permanent partner or relative up to the second degree of consanguinity, second degree of affinity or first civil relationship has filed a criminal complaint against one of the persons interested in the action carried out by Findeter or its representative or attorney-in-fact, or those who are entitled to intervene as a civil party in the respective criminal process.
8. There is serious enmity due to events unrelated to the actions carried out by Findeter, or close friendship between the member of the Board of Directors, Director or worker of Findeter and any of the people interested in the action, their representative or attorney-in-fact.
9. Be the member of the Board of Directors, Director or employee of Findeter, your spouse, permanent partner or one of your relatives in the second degree of consanguinity, first degree of affinity or first civil, creditor or debtor of any of the people interested in the action. carried out by Findeter, its representative or attorney-in-fact, except in the case of a person governed by public law, a credit establishment or a public limited company.
10. Be the member of the Board of Directors, Director or employee of Findeter, his spouse, permanent partner or one of his relatives indicated in the previous paragraph, partner of any of the people interested in the action carried out by Findeter or his representative or attorney-in-fact. society of people.
11. The member of the Board of Directors, Director or employee of Findeter has given advice or concept outside of the action carried out by Findeter on the issues involved, or has intervened in it as a representative, expert or witness. However, the references or explanations that the member of the Board of Directors, Manager or employee of Findeter makes about the content of a decision made by the Financial Company will not have the character of a concept.

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12. Be the member of the Board of Directors, Director or employee of Findeter, his spouse, permanent partner or one of his relatives indicated in section 1, heir or legatee of any of the people interested in the actions carried out by Findeter.
13. The member of the Board of Directors, Director or employee of Findeter has been recommended by the person interested in the action carried out by Findeter to reach the position he or she occupies or has been indicated by him as a reference for the same purpose.
14. Within the previous year, having had a direct interest or having acted as a representative, advisor, president, manager, director, member of the Board of Directors or member of a union, union, company, association or social or economic group interested in the matter object of definition.
15. And, all those situations that the Constitution, the Law and the applicable provisions establish as a conflict of interest in the development and exercise of the functions of the Financiera.

7. Differences

Any dispute arising between FINDETER and its shareholders, or between shareholders themselves, in connection with the articles of incorporation or during the dissolution or liquidation phase, shall be resolved directly between the parties. FINDETER will allow shareholders to review the necessary information for this purpose, provided that it is not confidential information.

8. Treatment for Gifts and Invitations

Findeter workers will not request or receive gifts, handouts, benefits or privileges, whatever their nature or amount, in order to preserve the integrity of the public function and institutional prestige. It is the worker's duty to make users aware of the legal prohibition of offering or giving gifts of any type, regardless of the motivation, dates or special occasions.

Money or equivalent such as checks, debit cards, securities, or any other document that can be convertible into money (gift cards) may not be received, regardless of its value.

Gifts or hospitality intended for academic or training purposes may not be received by natural or legal persons who have an interest in Findeter products.

In the case of receiving invitations from a supplier or ally to learn about their operation and be necessary for the development of Findeter's functions, the costs will be assumed by the Financiera to maintain independence and transparency.

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The situations described here extend to relatives in the second degree of consanguinity, second affinity or first civil relationship of the director or employee of Findeter.

Notwithstanding the above, promotional gifts, courtesy details or usual business hospitality may be accepted. That is, those in which all the following circumstances occur:

1. Not have commercial value, be proportionate to the circumstances and social uses. Those that, due to temporal coincidence or for other reasons, may be perceived as being made with the aim of influencing decisions pending adoption should not be accepted.
2. Not having been requested by the manager or worker.

It is understood that gifts or hospitality that do not comply with the aforementioned conditions cannot be received. Gifts that have been delivered contrary to these parameters must be reported to the Secretary General for the adoption of the necessary measures. In these cases, a database will be maintained with the reported information. In the case of the President, this situation must be brought to the attention of the Board of Directors.

Without prejudice to the above, managers and workers must act on these issues with ethical and moral value judgments, analyzing each situation objectively and rationally, taking into account the ethical principles of the organization and good social practices.

9. Sponsorships

The sponsorships made by the Entity will be linked to its corporate actions and compliance with the principles and ethical conduct of this Code.

The Entity, its managers and workers of all levels, will avoid carrying out the following behaviors:

- Grant sponsorships with which it is intended, improperly or illegally, to obtain or retain business or an undue advantage, or to give the appearance of legality to an act of corruption.
- Use sponsorships as payment to public or private employees or public Entities so that they improperly or illegally favor the Entity.
- Avoid the use of sponsorships so that, improperly or illegally, they facilitate the retention or obtaining of any business or undue advantage.

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- Avoid using institutional sponsorships as personal gifts for public or private employees.

10. Prohibition of Participation and Financing of Political Campaigns

Due to their legal nature, executives and workers of FINDETER may not, on an institutional basis: (i) participate in politics on behalf of the Entity, (ii) proselytize, (iii) make donations or financial contributions in favor of FINDETER of parties, movements or political campaigns, (iv) Use any of the entity's facilities for purposes other than those intended for its operation. Likewise, they must refrain at all times from using their link and position to the Entity to support parties, candidates or political campaigns, and must at all times respect the legal and regulatory provisions issued by the authorities.

11. Asset control

FINDETER must have tools that allow them to have knowledge about the capital status of their managers and workers, and to carry out periodic monitoring. Likewise, the administration will define the management mechanisms; The responsible areas will be responsible for its implementation, execution and the periodicity and scope of the information. Faced with this, administrators and workers are required to present it.

This follow-up will apply to the following FINDETER managers and workers, as well:

- President
- General Secretary
- Vice Presidents
- Managers
- Directors
- Bosses
- Treasury Department
- Operations Management
- Accounting Management
- Recruitment Management
- Fiduciary Business Planning Management
- Credit and Portfolio Management
- Workers associated with payroll Management
- Vice Presidency of Risks

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- Office of Internal Management Control

12. Use of Privileged Information

Findeter employees and directors may not provide third parties with information classified as privileged and may not use such information for their own benefit or that of third parties. For the purposes of this policy, privileged information is understood to be information that is subject to confidentiality, information that has not been disclosed to the public when there is a duty to do so, and information of a specific nature that has not been disclosed to the public and that, had it been disclosed, would have been taken into account by a reasonably diligent and prudent investor when trading the respective securities. Improper use of privileged information shall be deemed to occur when the person who possesses such information and is under the obligation to keep it confidential engages in any of the following conduct, regardless of whether such action brings them benefits: (i) providing privileged information to those who do not have the right to access it; (ii) using privileged information for the purpose of obtaining personal gain or that of third parties; (iii) concealment of privileged information to the detriment of Findeter or for one's own benefit or that of third parties, which involves using it only for oneself and by abstention, to the detriment of Findeter to stimulate one's own benefit or that of third parties; (iv) improper use of privileged information, when there is an obligation to disclose it, but it is not made public and is disclosed in a closed medium or is not disclosed in any way.

However, there are certain circumstances in which information classified as privileged may be used, as follows:

- When there is express authorization from the Board of Directors and the President to lift the confidentiality requirement, in cases where it is warranted.
- When there is a request from authorities empowered to do so.
- When it is made available to bodies with the right to know it, such as the General Shareholders' Meeting, the Board of Directors, the Statutory Auditor, members exercising their right of inspection, and external advisors. This takes into account the limitation established in Article 48 of Law 222 of 1995 regarding the right of inspection. Such information must be handled under strict confidentiality standards.

Notwithstanding the foregoing, under no circumstances may members of the Board of Directors and Senior Management use information classified as privileged to which they have access in the performance of their duties to obtain benefits and profitability or avoid losses,

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for themselves or for third parties.

Insider trading is considered a criminal offense and is defined by Article 258 of the Penal Code, as amended by Article 18 of Decree 1474 of 2011.

The sanctioned conduct refers to the unauthorized use of information that is not publicly known, to which access has been gained by reason of or in connection with the position or function held by a person in a private entity.

13. Money Laundering and Terrorism Financing

FINDETER, as an Entity supervised by the Financial Superintendency of Colombia, in compliance with the applicable regulatory framework and aware of the need to generate a control infrastructure against the Risk of Money Laundering and Financing of Terrorism (ML/FT), has implemented the SARLAFT in the Entity.

SARLAFT must be understood as a comprehensive culture of ML/TF risk management, which takes precedence over FINDETER's commercial policies and goals.

The SARLAFT has policies that are the guidelines that FINDETER has adopted to manage the ML/TF Risk, and allow the efficient, effective and timely operation of the system and are translated into rules of conduct that guide the actions of FINDETER and its workers in this matter.

13.1. Politics:

- a. Senior Management, the Compliance Officer and all FINDETER workers must ensure compliance with all provisions related to SARLAFT that are provided for in this Code and in the applicable regulations.
- b. The administration of conflicts of interest in the collection of information from the different stages of SARLAFT will be governed by the provisions of this Code.
- c. It is the obligation of every worker to report unusual and/or suspicious operations to the Compliance Officer who will carry out the diligence activities that are his or her responsibility.
- d. The Board of Directors and Senior Management of FINDETER recognize the administration of MLFT Risk as a management tool that will allow them to keep these risks under strict control and are committed to the development and maintenance of an effective SARLAFT for the Entity.
- e. Senior Management, through the Compliance Officer, is committed to promoting the SARLAFT culture at the institutional level.
- f. All FINDETER workers must put compliance with the rules on ML/TF Risk management before achieving the Entity's commercial goals and incorporate those corresponding to

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SARLAFT as an integral part of the development of their activities, giving strict and mandatory compliance. to the policies, processes and procedures on the matter.

13.2. SARLAFT breach:

Failure to comply with the obligations related to SARLAFT constitutes an unsafe practice in the financial sector and therefore unauthorized, and leads to the sanctions contained in subparagraph a. of numeral 5 of article 326 of the Organic Statute of the Financial System, where the powers of prevention and sanction of the Financial Superintendence of Colombia are located.

The failure to comply with the provisions of the SARLAFT by the workers will be understood as a serious offense. In the event of non-compliance with the aforementioned provisions, FINDETER will take corrective measures aimed at avoiding similar future situations and, if applicable, the sanction process provided for in the Entity will be applied.

14. Obligation to Report on Illegal or Suspicious Actions

All workers and executives of the Entity have the obligation to report illegal or suspicious actions to the competent internal or external bodies. Actions contrary to the ethical conduct of this code will be informed through the email created for this purpose: lineaetica@findeter.gov.co

15. Treatment of Illegal or Suspicious Actions and Sanctions

FINDETER reiterates its commitment to zero tolerances against illegal actions or ethical conduct that do not fall within the standards adopted by the Entity. Therefore, in accordance with the conduct of which it is known, the Entity will promote the actions that allow to advance the pertinent internal, disciplinary, fiscal, criminal, administrative and labor investigations, in accordance with the current regulations.

16. Obligatory Nature

The rules, principles and postulates set forth in this code are mandatory for their recipients.

17. Socialization of the Code of Ethics and Integrity

The socialization of this code will have the leadership of the management team to be

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communicated to our Stakeholders, through any of the following mechanisms:

- Publication on the institutional website where it can be consulted by all interest groups.
- Conducting awareness campaigns on the principles, policies and values of this code, led by the Human Resources Department with the support of the Communications, Marketing and Social Responsibility Management.
- Signing of a commitment to comply with the provisions of the Code of Ethics and Integrity by the Entity's workers upon admission.

18. Training in Ethics and Integrity Issues

In the induction and re-induction courses taught to Plant and Mission workers, ethical and integrity issues must be included, as well as others related to the fight against corruption.

19. Ethics and integrity committee

The functions of the Ethics and Integrity Committee will be in charge of the Institutional Committee of Management and Performance, which will have the function of monitoring and adopting measures around the application of this Code, as well as knowing the issues related to the breach of the guidelines contained herein.

20. Follow-up

The follow-up will be carried out at least once a year, based on the perception surveys or other mechanism that is suitable. The Human Resources Department will present the results to the Ethics and Integrity Committee for analysis.

21. Approval and disclosure

This Code of Ethics and Integrity was approved by the Board of Directors at its meeting on December 12, 2024, and by the General Shareholders' Meeting on March 19, 2025. Once approved, mechanisms will be created for its continuous dissemination to all the interest groups of the Financial.

22. Non-observance

In the absence of compliance with the provisions of this Code, in accordance with the conduct of the worker, it will be the Ethics and Integrity Committee who identifies and determines the transfer to the competent body.

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The manager or Findeter worker who is proven a violation or violation of this Code, in all cases, will be respected the right to defense, due process and will be subject to relevant disciplinary measures.

23. Reform Mechanism of the Code of Ethics and Integrity

Taking into account the constant evolution of the environment in which FINDETER is carried out, this Code of Ethics and Integrity will be reviewed, when it is required to adapt it to new needs, to best practices and to the guidelines that the Presidency of the Republic impart on this subject, the Administrative Department of the Public Function, the Board of Directors and other competent bodies in the matter, to the extent that this is consistent with the nature and resources of FINDETER.

It is the responsibility of the Ethics and Integrity Committee to propose adjustments to this code and submit the adjusted document for consideration by the Board of Directors.

Changes or updates to the Code of Ethics and Integrity will be socialized through the mechanisms contemplated in the same Code.

24. GLOSSARY OF TERMS AND ABBREVIATIONS FOR THE CODE OF ETHICS AND INTEGRITY

AMV	Colombian Stock Market Self-Regulator
ASOBANCARIA	Banking and Financial Entities Association of Colombia
BACK OFFICE	Area responsible for carrying out the operational aspects of the Treasury, such as the closing and registration in the securities trading systems, the closing and accounting registration and final authorization to the operations. In FINDETER: Operations Management.
BM	World Bank
BVC	Colombian stock exchange
CUSTOMER	All those natural or legal persons with whom FINDETER relates, through rediscount credit, technical assistance, investment alternatives, territorial planning, cooperation and administration agreements and resource management.

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CONFLICT OF INTERESTS	It is any situation or event in which the direct or indirect personal interests of the employees of the Financial Institution are in opposition to those of the Entity, interfere with their duties or lead them to act in their performance for reasons other than proceed correctly or to fulfill your responsibilities.
CRGAP	Committee on Risks and Management of Assets and Liabilities
DAFP	Administrative Department of Public Administration
EOSF	Organic Statute of the Financial System
FCPA	Foreign Corrupt Practices Act - FCPA of the United States Department of Justice
FINDETER	Financiera de Desarrollo Territorial S.A.
FRONT OFFICE	Area directly responsible for negotiating customer relations and commercial aspects of the Treasury. In FINDETER: Treasury Department
CORPORATE GOVERNANCE	The FINDETER Code of Good Governance establishes the set of values, policies, mechanisms and instruments, processes and best practices, through which the Entity's corporate governance actions are framed and regulated and the risks are directed and managed under a system of control that ensures transparency, efficiency, publicity and especially, they look for the confidence of the interest groups, the market and the citizenship in general, in the sustainable management that FINDETER develops.
INTEREST GROUPS	People, groups or Entities on which FINDETER has influence, or is influenced by them; It is synonymous with internal and external customers, or interested parties.
HARDWARE	In computer science it refers to the tangible physical parts of a computer system.
IR	(For the English expression Investor Relations, IR, or Investor Relations) of the Colombian Stock Exchange
LA / FT	Money Laundering / Terrorism Financing
MIDDLE OFFICE	Area responsible for measuring risks, verifying and preparing reports on compliance with policies and limits and exposure levels established in the different risks inherent in Treasury operations. In FINDETER: Vice Presidency of Risks
COMPLIANCE OFFICER	In FINDETER, it is the person who is responsible for verifying compliance with SARLAFT-related regulations issued by the surveillance agencies, and for compliance with the procedures established by the Entity as a preventive measure.

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OCDE	Organization for Economic Cooperation and Development
PEC	Corporate Strategic Plan
SARC	Credit Risk Management System
SARL	Liquidity Risk Management System
SARLAFT	Asset Laundering and Terrorist Financing Risk Management System
SARM	<i>Market Risk Management System</i>
SFC	Financial Superintendence of Colombia
SOFTWARE	In computer science, it refers to the software of a computer system, which comprises all the necessary logical components that make it possible to perform specific tasks.
TRADING	Stock Trading
ADMINISTRATIVE TRANSPARENCY	The obligation of transparency in information allows investors to carry out the exercise of control over the rights inherent in the ownership of capital entrusted to administrators and employees. <i>Manday property</i> requests administrative transparency in order to safeguard their investments and force them to adopt measures so that in the companies in which they are invested they do not violate environmental legislation, develop discriminatory personnel policies, or adopt predatory behaviors in social communities in Where they operate
UNODC	United Nations Office on Drugs and Crime
<i>VeR</i>	In risk management it refers to: Value at Risk
VME	In risk management it refers to: Maximum Exposure Value

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Annex 1. SPECIAL RULES FOR THE DEVELOPMENT OF TREASURY ACTIVITIES

1 GENERAL CONDITIONS

Treasury Operations

It refers to the securities market and foreign currency activities authorized for FINDETER by current regulations, whose authorizations are found in the SARM and SARL Manual.

Treasury Department (Front Office)

Area directly responsible for negotiating customer relations and commercial aspects of the Treasury.

Vice Presidency of Risks (Middle Office)

Area responsible for measuring risks, verifying and preparing reports on compliance with policies and limits and exposure levels established in the different risks inherent in Treasury operations. Carry out the risk analysis, review and periodic evaluation of the valuation methodologies of financial instruments and risk measurement.

Operations Management (Back Office)

Area responsible for carrying out the operational aspects of the Treasury, such as the closing and registration in the securities trading systems, the closing and accounting registration and final authorization to the operations.

VME maximum exposure value

The value of the maximum exposure is defined in the Manual of the SIAR Comprehensive Risk Management System.

1.1 Legal Framework

The Basic Accounting and Financial Circular (External Circular 100 of 1995) issued by the Financial Superintendence of Colombia, Decree 2555 of 2010 and the special regulations issued by the Colombian Securities Market Self-Regulator (AMV).

1.2 Conflict of interest

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The provisions for the management of conflicts of interest are established within this Code of Ethics and Integrity of the Entity.

1.3 Prevention and prohibition of misuse of information

In order to avoid that, because of the work or the functions, FINDETER workers use confidential information for their own benefit or third parties, the following is established:

- The Entity's employees are obliged to keep absolute reserve on all the information, policies, procedures or operations that are provided to them, that are made known to them or to which they have access during their work.
- In particular, confidential information is considered to be any information received by developing workers or on the occasion of their connection to the Entity, both owned by the Entity and information that workers have received from third parties, including, without limitation, any legal information, accounting, tax, technical, technological, financial or commercial of the Entity or of the third parties, of the partners or shareholders, and of the clients of both.
- The obligation of confidentiality does not extend in any case to: (i) information outside the public domain prior to the date on which it was delivered to the workers who receive the information; (ii) information that has been lawfully made public by decision of the Entity; (iii) information that must be delivered by legal mandate to the authorities of any order; (iv) information that must be made public for the adequate fulfillment of the worker's activity.
- The worker must refrain from carrying out for himself or for third parties, arrangements, reproductions, adaptations or any other kind of mutilation, deformation or modification of the information that comes to his knowledge in development or on the occasion of his work.

1.4 Privileged information

In relation to the operations of the stock market, that specific information that has not been disclosed to the public and that would have been taken into account by a moderately diligent and prudent investor in negotiating the respective securities is privileged.

1.5 Guiding Principles

Treasury operations are subject to the policies established by the Board of Directors, the Presidency and the Committee on Risks and Management of Assets and Liabilities, in accordance with the methodologies adopted for the allocation of investment quotas, counterpart and the limits set for negotiation. These operations will be governed in accordance with the guiding principles of transparency, honesty, loyalty, professionalism and

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objective selection adopted by the Code of Ethics and Integrity.

In addition to the provisions contained herein, workers directly or indirectly linked to the celebration of the guiding principles will have the following general guidelines:

1.5.1. Front office principles

- Workers must keep in mind that their first responsibility is to FINDETER and they must always maintain their loyalty to the Entity.
- Act with the duty of best execution of operations which must aim for the result that most benefits FINDETER in accordance with market conditions.
- The confidentiality of information is one of the operating policies. No worker may reveal or discuss the information of an operation with people other than those involved in the transaction.
- All negotiations must be carried out from telephones connected to the call recording system or any other verifiable means in accordance with the Regulations issued by the AMV or whoever performs its functions.
- All operations must be carried out under the concepts of clarity and precision of their terms.
- No treasury operation should be based on privileged information, or that violates the spirit of the regulations.
- Negotiations may only be carried out with counterparties and issuers authorized by the Board of Directors, and in accordance with the Maximum Exposure Values determined by it, which will be duly and timely informed to the Treasury Department.
- The execution of operations will be carried out within the limits and amounts authorized by position levels, as determined by the Board of Directors.
- Workers involved in treasury operations will refrain from carrying out operations directly or through an intermediary, using privileged information.
- Workers must immediately communicate to their superior any special situations that affect market variables and that may affect FINDETER's financial results.
- Workers must report to their immediate superior any suspicious behavior they perceive from any person, whether linked to FINDETER or not.
- Act with impartiality and suitability regarding the actions of Back Office and Middle Office workers.
- All operations must be carried out under the other current legal parameters of FINDETER and the regulatory and surveillance and control entities.
- The different Entities with VME will be given equal opportunity to negotiate.

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1.5.2. Back Office Principles

- The workers must bear in mind that their first responsibility lies with FINDETER and they must always maintain their loyalty to the Entity.
- The confidentiality of information is the main rule of operation. No worker may disclose or discuss the information of an operation with people other than those involved in the transaction.
- Verify the operations carried out by the negotiation area or Front Office by confronting the information that it provides versus the supports that the counterpart sends.
- The information provided to the different clients must be clear giving them security and credibility of the Entity.
- Verify that all operations performed on the day have been recorded in the financial application.
- Periodic reviews should be carried out on the facial and trading conditions of each security and the records contained in the databases that are kept, in order to detect errors or violations of the established authorizations.
- All operations must be carried out under the other legal parameters in force of FINDETER and the regulatory and surveillance and control entities.

1.5.3. Middle Office Principles

- The workers must bear in mind that their first responsibility lies with FINDETER and they must always maintain their loyalty to the Entity.
- The information recorded in the area of the Middle Office, which can be used to resolve a conflict of interest, will be presented in case it is required by any of the parties in the presence of all those involved, in the case of internal parties or internal involved in case of conflict with external counterpart. In case of requests by external counterparts, the use and conditions of the information must be authorized by the administration of FINDETER.
- Monitor in accordance with the ethical principles defined by the Entity, that the negotiations are with the counterparties and with the issuers authorized by the Board of Directors, and in accordance with the VME's indication, the limits and amounts authorized by levels of charges determined by it.

1.5.4. Independence Principle

The Vice Presidency of Risks depends on the Presidency of the Entity, and its performance is independent of the areas in charge of the functions of trading, processing and accounting of treasury operations.

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1.5.5. Transparency principle

All the operations of the Vice Presidency of Risks must be executed with strict adherence to policies, rules and procedures, previously defined and disclosed by the body responsible for formulating them within the respective agency.

The results of the Entity's risk measurement must be known both internally and externally. In the first case, to serve as a guide for the selection of markets and products in which you want to participate. In the second case, so that third parties and customers know at all times the level of risk assumed by the Entity in its operations and the level of risk it is willing to assume (Value at Risk).

It is defined as the possibility of trading a security in the securities market, to be carried out under conditions that do not affect their price at the time of carrying it out, implying losses in the portfolio.

Consequently, the securities managed by the Entity must present an adequate pricing, which is guaranteed with elements such as the volume of transactions, the amount of them at the historical level, liquidity cycles, valuation at market prices , etc. In other words, the value of the investments of the different portfolios must reflect in a certain and permanent way, the resources that can be counted when they become liquid.

Additionally, the liquidity of each portfolio must be related to the cash flow of the owner of the resources of each portfolio.

The profitability of the different business lines of the Entity must be related to the level of risk assumed in each case, respecting the safety and responsibility criteria that the Entity workers must observe at all times.

The expected return should be subject to the risk, structure and liquidity policies of the portfolios, as well as the way in which the market is acted upon. The Entity's workers must establish the adoption of a rational market strategy, so that their participation in it does not threaten the proper formation of prices or lead to the deterioration of the Entity's assets or the resources it manages.

Security is defined as the set of mechanisms that optimize the relationship between profitability and a certain level of risk, previously established, so that the Entity is exempt from the portfolio investments exceeding at some point the maximum level of risk that it is willing to accept or manage.

Under this principle, all the resources of each portfolio must be invested in conditions that ensure, at all times, that the risk thereof is manageable and is within the established

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parameters and within acceptable levels, in order to not jeopardize the fulfillment of the objective of each portfolio.

2. FRAMEWORK OF ACTION

The Treasury may only carry out those operations legally authorized for FINDETER, in the Organic Statute of the Financial System and that have been approved by the Board of Directors.

FINDETER Treasury makes investments, mostly in the short and medium term, because the Entity's main business is credit rediscounts and they demand availability of permanent resources.

However, in accordance with market conditions and risk analysis, the Asset and Liability Risk and Management Committee may authorize long-term investments.

2.1. FRONT OFFICE workers

FRONT OFFICE workers must conduct business while preserving, in their development, the guiding principles of honesty, loyalty, transparency, professionalism, using information, security, commercial integrity and seriousness, always in compliance with the institutional mission. They must also, among others:

- To act with due diligence in the placement of resources, either by receiving offers to buy or sell securities for or from FINDETER's portfolio.
- Refrain from carrying out operations that exceed the individual or general policies and limits established by the Asset and Liability Risk and Management Committee and by the Board of Directors, related to counterparties, issuers, markets, types of operations and quotas.
- Make sure through the electronic means at your disposal, that the operations to be carried out are framed within the conditions managed by the market and by current regulations.
- Provide the counterparties and obtain from them all the information that is necessary for making investment decisions, refraining from the use of privileged information and maintaining the bank reserve at all times.
- Provide the back office with complete and timely information for the fulfillment of operations.
- Administer in accordance with the provisions of this Code, conflicts of interest and ensure equitable treatment of their counterparts.
- Refrain from carrying out operations, directly or through an interposed person, using inside information.

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- Perform operations only and directly with authorized counterparties and up to approved quotas.
- Maintain the appropriate assurances of the different systems (hardware and software) that are used for the development of the functions entrusted.
- Ensure that the guidelines established for the prevention of money laundering are preserved in carrying out the investment operations of the financial resources.
- To strive for healthy competition, integrity and fairness towards the Entity and industry in general, avoiding misleading another to obtain a benefit for the Entity, or benefit from a clear error of the counterpart / client.

2.2. MIDDLE OFFICE workers

MIDDLE OFFICE workers must conduct their actions seeking to preserve the guiding principles established in this Code, such as honesty, loyalty, responsibility and seriousness, always in compliance with the institutional mission. They must also, among others:

- Keep permanently updated on the operation of the different tools that allow the risks to be measured and controlled at all times, and the strict compliance with established policies and procedures on the other.
- Ensure that the actions of the workers in charge of making the investments conform to the principles established in this Code of Ethics and Integrity, taking into account what is implemented in their manuals of functions and procedures, paying special attention to the markets, products, limits and quotas defined and approved.
- Maintain absolute independence from the actions of workers in the Investment Area and from third parties involved in the operations under analysis.
- Verify that the information systems are adequate and provide the information necessary for decision-making regarding investment and risk control. For this purpose, they will immediately report any deficiency in the flow of information, either their own, against third parties or of these against FINDETER.
- Ensure that privileged information is disclosed only to authorized workers and by the means provided for that purpose.

2.3. BACK OFFICE workers

BACK OFFICE workers must comply with the investment and risk management policies established by the Asset and Liability Risk and Management Committee and the Board of Directors, ensuring strict compliance with the procedures established therein. They must also, among others:

- Ensure that the operations carried out for the Financial Company are properly registered in the systems provided for this purpose, both internal and external.

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- Maintain absolute independence from the actions of Front Office and Middle Office workers.
- Act with due diligence and professionalism to generate information with the standards of quality and reliability required in the daily operation of FINDETER.
- Ensure that the guidelines established for the prevention of money laundering are preserved in the investment operations of FINDETER's resources.