GENERAL GUIDELINES FOR THE MANAGEMENT AND ADMINISTRATION OF CORRUPTION RISK FOR THIRD PARTIES AND INTERMEDIARIES (TPIs)

Banco Popular S.A., as a financial institution that is part of Grupo Aval Acciones y Valores, complies with anti-corruption guidelines and is committed to informing its Third Parties and Intermediaries (TPIs) of the minimum aspects of the Anti-Corruption Policy that must be known and considered in connection with their business relationship with the institution.

1. OBJECTIVES

1.1. GENERAL OBJECTIVE

To inform the Third Parties and Intermediaries (hereinafter, TPIs) of Banco Popular S.A. (hereinafter, Banco Popular) about the general guidelines for the management and administration of corruption risk.

1.2. SPECIFIC OBJECTIVES

To promote an ethical culture in relationships with third parties through guidelines aimed at mitigating corruption risks during the selection, contracting, and execution of contracted activities, under the principle of "Zero Tolerance."

To provide guidelines to prevent, detect, investigate, and promptly remediate practices that, if not properly addressed, could result in corruption events in the relationship between Banco Popular and its TPIs.

2. SCOPE

TPIs of Banco Popular.

3. REGULATORY FRAMEWORK

As part of its regulatory reference framework, Banco Popular includes within its guidelines the provisions set forth in the following national and international laws and standards:

- Law 1778 of 2016.
- ISO 37001 International Standard – Anti-Bribery Management System.
- Colombian Criminal Code and Colombian Anti-Corruption Statute (Law 1474 of 2011).
- Foreign Corrupt Practices Act of 1977 (FCPA – Foreign Corrupt Practices Act).
- Sarbanes-Oxley Act (SOX – Sarbanes-Oxley Act).

4. GUIDELINES

4.1. FACILITATION PAYMENTS

Banco Popular does not permit the giving or receiving of payments, bonuses, fees, commissions, advances, travel allowances, checks, debit cards, or any other document that may be convertible into cash, for the purpose of expediting processes or procedures carried out before or on behalf of a third party, also known as “Facilitation Payments.”

The general guidelines for certain special transactions are set out below:

4.2. GRANTING OF GIFTS AND INVITATIONS BY A BANK EMPLOYEE TO A TPI

The granting of gifts and invitations by a Banco Popular employee to a TPI shall be governed by the following guidelines:

The following may be offered:

- Promotional or institutional items that represent the corporate image, such as umbrellas, caps, pens, calendars, and planners.
- Items on special occasions such as Christmas, Friendship Day, Administrative Professionals’ Day, Children’s Day, Women’s Day, among others. The delivery of flower arrangements, foliage arrangements, senior citizen gift plans, newborn gift baskets, among others, is permitted, provided that their value does not exceed 0.5 Monthly Legal Minimum Wages (SMMLV), accumulated annually for the same beneficiary within the same calendar year.

Invitations to events related to the ordinary course of business, such as breakfasts, lunches, dinners, cocktail receptions, workshops, seminars, trips, and, in general, activities intended to demonstrate services or products, as follows:

a) Seminars, courses, and other academic or training events, provided that such events do not exceed two (2) days in duration and their cost does not exceed one point five (1.5) Monthly Legal Minimum Wages (SMMLV) per invited person.

b) Invitations to breakfasts, lunches, and dinners, provided that their value does not exceed one point five (1.5) Monthly Legal Minimum Wages (SMMLV – Salario Mínimo Mensual Legal Vigente), accumulated during a calendar year for the same beneficiary, and provided that no more than three (3) events are held in the same year.

c) Invitations and tickets to entertainment events, provided that their value does not exceed one point five (1.5) Monthly Legal Minimum Wages (SMMLV – Salario Mínimo Mensual Legal Vigente), accumulated during a calendar year for the same beneficiary, and provided that no more than three (3) events are held in the same year.

d) Inauguration events for projects carried out by Grupo Aval or any of its subsidiaries in the ordinary course of their corporate purpose (e.g., highways, hotels, civil works projects, new bank branches).

4.3. GRANTING OF GIFTS AND INVITATIONS BY A TPI TO A BANK EMPLOYEE

The granting of gifts and invitations by a TPI to a Banco Popular employee shall be governed by the following general guidelines:

- Under no circumstances may gifts or invitations consist of cash or any cash equivalent, such as vouchers, checks, debit or credit cards, securities, and/or negotiable instruments.
- The gift or invitation may not exceed one point five (1.5) Monthly Legal Minimum Wages (SMMLV – Salario Mínimo Mensual Legal Vigente), and may not be received more than once during the same quarter from the same third party.
- Under no circumstances may the gift or hospitality be capable of improperly or unlawfully influencing the employee’s conduct or decision-making.
- Gifts or invitations must not be granted during a negotiation or within the three (3) months following a negotiation.

**Note: For the receipt of gifts and invitations, the same conditions established in Section 4.2, items a) through d), shall apply, mutatis mutandis.*

4.4. OTHER SPECIAL OPERATIONS

If a TPI intends to carry out activities such as sponsorships, donations, public contributions, and/or political contributions on behalf of Banco Popular, it must comply with the specific guidelines applicable to each of these special operations.

5. AUDIT AND ANTI-BRIBERY CLAUSES

Banco Popular reserves the right to include audit clauses in contracts or in the corresponding contractual document, allowing verification of compliance with these guidelines. Likewise, it may include an anti-bribery clause whereby the parties declare that they are aware of and undertake to strictly comply with local and international anti-corruption provisions.

Failure to comply with the obligations described herein shall constitute grounds for immediate termination of the contract, without giving rise to a breach by Banco Popular and without entitlement to any compensation whatsoever.

6. BANCO POPULAR ETHICS LINE

Banco Popular makes its Ethics Line available to its TPIs and other stakeholders for the purpose of encouraging the reporting of potential violations of the guidelines described in this document or any other conduct that contravenes corporate standards.

Banco Popular's Ethics Line has been established under security parameters that guarantee the confidentiality of the information provided and protect the identity of the individual supplying the information.

The Ethics Line is available through Banco Popular's website, in the About Us / Ethics Line section.

7. OCCASIONAL CERTIFICATIONS

Banco Popular may request from TPIs with whom it maintains a contractual and/or commercial relationship a certification acknowledging awareness of and compliance with the general guidelines contained in this document, whenever deemed necessary.