POLICY ON THE CRIMINAL AND ETHICAL COMPLIANCE MANAGEMENT SYSTEM SARLAFT AND ABAC

MACROPROCESS
RISK SYSTEMS MANAGEMENT

PROCESS
CRIMINAL AND ETHICAL COMPLIANCE MANAGEMENT SYSTEMS MANAGEMENT

Approvals	
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1. INTRODUCTION

Banco Popular, aware of its obligation and responsibility to comply with national and international regulatory provisions issued within the framework of the fight against crimes such as money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, national and transnational bribery, corruption, and internal fraud, as well as with the FCPA Law, the Code of Ethics and Conduct, and the Corporate Governance Code, recognizes that the materialization of any risk arising from failure to apply the guidelines defined in these matters may significantly affect the image and reputation of the Bank and its subsidiaries, in addition to breaching the law and undermining the trust of employees, investors, shareholders, business partners[1], clients, and the overall business environment.

In view of the foregoing, the Bank adopts a "Zero Tolerance" commitment against these crimes and establishes the Criminal and Ethical Compliance Management System as the mechanism for planning, implementing, measuring, and continuously improving coordinated guidelines and actions to prevent, detect, investigate, and correct the materialization of these risks; promote transparency; discourage inappropriate conduct; and strengthen the commitment of its business partners. The system actively promotes ethical conduct in all operations of the entity and its subsidiaries, based on the trust and confidence placed in partners, executives, and employees in the performance of their duties.

2. SCOPE

Through this policy, the Criminal and Ethical Compliance Management System defines the scope for managing compliance risks derived from national and international regulations on money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction (LA/FT/FPADM), national and transnational bribery, corruption (ABAC – Anti-

[1] **Business partners** are counterparties or stakeholders that are not limited to clients or financial consumers; they also include suppliers, contractors, consultants, vendors, advisors, agents, distributors, representatives, and intermediaries with whom the Bank has or intends to establish a commercial relationship.
Commercial relationship refers to the agreement between a third party and the Bank, as independent entities that mutually agree to achieve a common objective, in order to support the services provided by the Bank to its clients, the development of its corporate purpose, and/or the support activities it carries out. The relationship is formalized through the corresponding legal document, which defines the type of relationship, whether proprietary or corporate, involving administrative or non-administrative expenditure between the third party and the Bank.

Bribery and Anti-Corruption), as well as internal fraud and the commitments contained in the Code of Ethics and Conduct and the Corporate Governance Code.
The implementation of this system is led by the Compliance Management Office of the Bank's Risk Vice Presidency, with support from the Compliance Officer and their team, through the implementation of the SARLAFT and ABAC risk management systems. It applies to the Bank's processes, operations, products, services, and jurisdictions that, following the analysis of external and internal contexts, are exposed to LA/FT/FPADM and ABAC risks, including associated predicate offenses.

3. OBJECTIVES OF THE CRIMINAL AND ETHICAL COMPLIANCE MANAGEMENT SYSTEM

To ensure compliance with national and international laws and regulatory requirements, as well as with the corporate governance, ethical, and transparency guidelines that must guide the actions of the Bank and all related persons and business partners in matters involving money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, national and transnational bribery, corruption, and internal fraud, in order to avoid sanctions and preserve the Bank's image and reputation.

3.1 SPECIFIC OBJECTIVES

- To implement sufficient and reasonable measures to ensure integrity and transparency in the Bank's processes and operations and in its relationships with business partners, in accordance with the values of respect, responsibility, commitment, loyalty, and honesty established in the Code of Ethics and Conduct.

- To promote a "Zero Tolerance" culture within the Bank aimed at preventing LA/FT/FPADM, ABAC, and internal fraud events, as well as strengthening the Bank's compliance model in this area.

- To establish mechanisms to effectively and promptly detect, investigate, and remediate LA/FT/FPADM, ABAC, and internal fraud events, while maintaining transparent and ethical relationships with business partners and safeguarding operations, image, and reputation.
- To manage and mitigate LA/FT/FPADM, internal fraud, national and transnational bribery, and corruption risks through the effective identification, assessment, and implementation of anti-money laundering, anti-fraud, anti-bribery, and anti-corruption controls.

Activities designed to ensure compliance with the system's objectives are planned annually and formalized in the annual work plan, which is approved, together with the respective change controls, by the Compliance Manager / Compliance Officer. Implementation is measured at least quarterly to identify deviations that could compromise compliance. Changes to the plan are supported by operational risk events, together with the corresponding action plan for the normalization of activities.

4. SCOPE OF APPLICATION

Through this policy, the Criminal and Ethical Compliance Management System applies to all employees, administrators, directors, and partners in their direct or indirect relationships with the Bank, and to the Bank in its relationships with business partners, in the development of any commercial, contractual, or legal relationship of any nature, in accordance with the legal framework for the prevention of money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, national and transnational bribery, corruption, and internal fraud.

5. VALIDITY

This policy, which sets out the guidelines of the Criminal and Ethical Compliance Management System, shall enter into force upon its dissemination in accordance with the change management methodology established by the Bank. It shall be reviewed and updated at least annually by the Compliance Management Office or its equivalent, in order to ensure that continuous improvement and the ongoing evolution of the system reflect the measures adopted to prevent AML/CTF/WMD-PF (LAFT/FPADM), ABAC, and internal fraud risks.

6. CRIMINAL AND ETHICAL COMPLIANCE OBLIGATIONS

As part of its external context analysis, the Bank identifies Criminal and Ethical Compliance obligations that fall within the SARLAFT and/or ABAC risk management systems and may affect the Bank's internal context, including its organizational structure, policies, processes, products, services, jurisdictions, and channels, among others. This enables the Bank to analyze and assess risks and to manage and disclose, in a timely manner, to Senior Management and other stakeholders the measures and/or modifications required within the established terms and timelines.

The Criminal and Ethical Compliance obligations that frame Banco Popular's operations in relation to AML/CTF/WMD-PF (LAFT/FPDAM) and/or ABAC are detailed in the compliance standards annex. Their respective updates or regulatory changes are identified through the recurring regulatory assurance process.

7. GUIDELINES

The Criminal and Ethical Compliance Management System is governed by the following guidelines:

- The Bank promotes a "Zero Tolerance" culture regarding risks related to AML/CTF/WMD-PF (LA/FT/FPADM), internal fraud, national and transnational bribery, and/or corruption. Accordingly, it manages risks in the performance of its employees' duties. Employees must prioritize compliance with the policies and processes established for the control and prevention of AML/CTF/WMD-PF, national and transnational bribery, corruption, and internal fraud over the achievement of commercial targets or any other institutional or personal interest, in order to comply with regulations and safeguard the Bank's institutional reputation.

- The Bank strictly prohibits AML/CTF/WMD-PF, internal fraud, national and transnational bribery, and/or corruption in any form, whether carried out directly or indirectly through an agent or other third party, and whether involving a public official or a private individual.

- In strict compliance with the FCPA Law, the Bank prohibits offering, promising, paying, giving, or authorizing the delivery of anything of value, such as gifts, business entertainment, discounts, meals, travel, goods, services, employment for relatives, or charitable contributions, among others, directly or indirectly through a third party, to any government or private official for the purpose of influencing a business or official decision and/or obtaining or retaining business. This prohibition includes facilitation or expediting payments and expressly includes giving anything of value to any third party while knowing or being aware of a high probability that such third party will, in turn, offer, promise, or provide a benefit prohibited by this Policy.

- The Bank's Board of Directors has expressly prohibited entering into or maintaining business relationships with individuals who refuse to provide information regarding their economic activity, domicile, profession, or voluntary declaration of the origin of funds, or who provide false or difficult-to-verify information. This prohibition also applies to individuals who, without justified reason and after assessment by the Compliance Management Office as part of monitoring processes, refuse to update their basic and financial information when expressly required by the Bank.

- The Bank's representatives must never make false or malicious statements in any Bank records, financial indicators, financial activities, data, processes, business operations, or any other information protected by banking secrecy. Bank employees shall maintain accurate, complete, and reliable books and records and ensure that accounts accurately and fairly reflect the Bank's transactions and dispositions.

- The Bank shall not discriminate against or tolerate any form of retaliation against any person who, in good faith, reports conduct related to AML/CTF/WMD-PF, internal fraud, bribery, and/or corruption. However, submitting a report or providing information while knowing that such information is false or malicious is unacceptable and shall be considered a violation of this Policy.

- The Bank shall ensure that counterparties or business partners with whom it maintains commercial relationships have sound business practices and/or corporate governance codes, including policies stating that they will not be used for criminal activities, particularly AML/CTF/WMD-PF, internal fraud, national and transnational bribery, and corruption. Counterparties, including their parent companies or subsidiaries, with alerts or adverse behavior may not be considered for business relationships or business continuity.

- No employee or business partner may engage, whether by action or omission, negligence, and/or intent, in acts related to AML/CTF/WMD-PF, internal fraud, bribery, or corruption, and they are therefore required to prevent such events.

- If any situation related to AML/CTF/WMD-PF, internal fraud, national and transnational bribery, and/or corruption is identified, employees, administrators, and business partners must report it immediately through the designated reporting channels. No relationship or link shall be maintained with counterparties where such conduct is proven or reasonably suspected.

- The Bank shall not provide services to individuals or companies where there are reasonable doubts regarding the legality of their operations or the lawfulness of their funds. Likewise, objective grounds for termination may include those set forth in the Bank's Products and/or Financial Services Regulations, referring to predicate offenses related to AML/CTF/WMD-PF and/or activities defined as predicate offenses under the Colombian Criminal Code and other applicable regulations.

- The Bank implements guidelines for the management and administration of third parties and intermediaries (TPI), as established in the Anti-Corruption (ABAC) Policy and the Strategic Procurement Policy, which define the due diligence requirements for supplier onboarding and assessment.

- The Bank prohibits its employees from giving or receiving payments for the purpose of expediting processes or procedures carried out before a third party or on behalf of a third party or intermediary.

- The conduct of Bank employees is governed by the standards of behavior established in the Code of Ethics and Conduct, taking into account the responsibilities and roles defined in the organizational structure and the functions they perform. Regardless of their position, employees must remain alert to unusual behavior by clients, employees, and business partners and report it as established in the aforementioned Code.

- The Bank complies with obligations related to international lists that are binding for Colombia under international law, including the United Nations lists of sanctioned countries issued by the UN Security Council Committee, and European terrorist lists. Accordingly, it screens current and potential clients and users, as well as shareholders related to the acquisition of goods or services, in order to avoid establishing relationships or entering into contracts with individuals listed therein and to proceed with their disengagement if identified.

- The commercial ethics of the Bank and its subsidiaries are based on fair competition, including, where necessary, benefits linked to product conditions, such as interest rates, preferential terms, write-offs, among others. The offering of other benefits, including reciprocity arrangements, must comply with the internal procedures in force at the time of negotiation. Any benefit offered to a client, including reciprocity arrangements, must be granted with full transparency, without resorting to improper, abusive, anti-competitive, or illegal practices. All commercial activities of the Bank's subsidiaries, particularly those involving public entities, must comply with the corporate policies and instructions governing commercial ethics.

- Under no circumstances shall the Bank establish correspondent relationships with banks or bank branches that qualify as shell banks. Cross-border correspondent relationships are governed by the Foreign Trade Manual processes, including the International Correspondent Relationship procedures and the Update of Information for Foreign Correspondents managed by the Treasury Department.

- The Bank is committed to complying with all applicable laws in every jurisdiction where it conducts business.

- Failure to comply with the provisions contained herein shall be considered a serious breach and shall be sanctioned in accordance with applicable regulations.

8. RISK ANALYSIS

The Bank has determined that the risk analysis of the Criminal and Ethical Compliance Management System shall be carried out based on the results of the external and internal context analysis. This analysis identifies new developments or updates to compliance obligations, as well as general and specific vulnerabilities and causes arising from non-compliance with these obligations across customer segments, products, services, channels, jurisdictions, and/or value chain processes that may expose the Bank to the materialization of AML/CTF/WMD-PF (LAFT/FPADM) and/or ABAC risks.

This analysis aims to identify the inherent risks of the Criminal and Ethical Compliance Management System prior to the launch of a new product or service, the use of new commercial practices, new service delivery channels, the use of new technologies or technologies under development for new or existing products, changes to product characteristics, entry into new markets, and/or the commencement of operations in new jurisdictions.
Assurance of Criminal and Ethical Compliance obligations is carried out through the implementation of processes with SARLAFT and/or ABAC impact, included in the Bank's value chain. The identification and assessment of inherent risks within this system, as well as the determination of corresponding controls and the measurement of residual risk, are performed using the SARLAFT and ABAC stage methodology. The results are consolidated

in the compliance risk matrix, which is monitored semiannually through certification of effectiveness and proper functioning by the responsible first-line owners.

The Compliance Officer ensures the implementation of the necessary actions to correct identified deficiencies and/or to strengthen or implement required controls, in order to reduce or maintain residual risk at a low level, in accordance with the levels approved by the Board of Directors.

The Compliance Officer presents the results of the risk analysis and the effectiveness of controls to the Non-Financial Risk Committee and the Board of Directors at least semiannually, or more frequently if required.

9.ROLES AND RESPONSIBILITIES

9.1 BOARD OF DIRECTORS

- To approve the Criminal and Ethical Compliance Management System Policy and its respective amendments.
- To clearly understand the risks arising from Compliance obligations for the prevention of money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, and national and transnational bribery, and to ensure that they are reported at least semiannually to the Board of Directors in a timely, complete, understandable, and accurate manner through the reports of the SARLAFT and ABAC Compliance Officer.
- To fulfill the other functions established in the SARLAFT and ABAC policy, including the following:
- To receive periodic reports on confirmed cases of bribery and/or corruption that have been identified, as well as the related investigative measures and conclusions.
- To provide the necessary technical and human resources to implement and maintain the operation of the SARLAFT and ABAC management systems, through which implementation of the Criminal and Ethical Compliance Management System is ensured.
- To be informed of the measures taken by Management in response to failures in the SARLAFT and ABAC risk management systems that result in non-compliance with Criminal and Ethical Compliance obligations.
- To appoint the SARLAFT Compliance Officer, both principal and alternate, in accordance with the provisions of Part I – Title IV – Chapter IV of the Basic Legal Circular issued by the Financial Superintendence of Colombia.

9.2 NON-FINANCIAL RISK COMMITTEE

- To comply with the responsibilities set forth in the Rules of Procedure of the Non-Financial Risk Committee.

9.3 BANK MANAGEMENT

- To promote a “Zero Tolerance” culture toward crime, aimed at preventing AML/CTF/WMD-PF (LA/FT/FPADM) events, ABAC, and internal fraud, while fostering ethical behavior and communicating the importance and responsibility of all employees within the Criminal and Ethical Compliance Management System.
- To encourage adherence to and compliance with ISO 37301 Compliance Management Systems, as well as NTC 6671 Management System for money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, bribery, corruption, and internal fraud.
- To allocate the necessary team to ensure the implementation and continuous improvement of the Criminal and Ethical Compliance Management System, in accordance with defined competencies, and to ensure that responsibilities are assigned based on levels of leadership and decision-making authority.

9.4 COMPLIANCE OFFICER

- The Compliance Officer is appointed by the Board of Directors, which ensures that the role is assigned to a person with “appropriate authority to make decisions.” This position shall be held by the Vice President of Risk and/or the Compliance Manager, or whoever acts in their place. Their competencies and duties shall be governed by the provisions of the Basic Legal Circular of the Financial Superintendence of Colombia, the SARLAFT and ABAC manuals, the job description, and any provisions that amend or supplement them.

- The Compliance Officer, whether principal or alternate, is responsible for the Criminal and Ethical Compliance Management System and is part of the Second Line, performing their role independently and diligently. This individual reports directly to Senior Management, the Non-Financial Risk Committee, and the Board of Directors, and is a permanent invitee, with voice but no voting rights, to the Ethics and Conduct Committee.

- If the Compliance Officer and/or their alternate, in the performance of SARLAFT duties or any additional assigned functions, is exposed to a real or potential conflict of interest, they must disclose it to their immediate superior and/or to the Bank's Ethics and Conduct Committee, where it shall be addressed in accordance with the established guidelines.

10 INFORMATION AND CHANGE MANAGEMENT

10.1 INFORMATION REPOSITORY

Banco Popular has an information repository that supports the components of the Criminal and Ethical Compliance Management System, as well as tools that enable the management of identified risks and implemented controls. This ensures the availability, timeliness, and reliability of information.

The policies, processes, annexes, and respective information assets required for the proper functioning of the Criminal and Ethical Compliance Management System are safeguarded by the heads of the areas involved in the system and by the Value Chain Management and Operational Excellence Department, as applicable. They are identified, classified, rated, and published in the Virtual Link within the Process Library according to their level of confidentiality.

10.1 CHANGE MANAGEMENT

Changes required to ensure compliance with compliance obligations and their respective updates are implemented in accordance with the provisions established in the change management manual, through the following key activities:

- Change assessment: identify how new international, national, and local regulations, as well as regulations at the financial conglomerate level (Grupo AVAL), in relation to SARLAFT and/or ABAC, impact the Bank's internal context, including its organizational structure, policies, processes, products, services, jurisdictions, and channels, among others.
- Affected stakeholders: identify, within the RACI matrix and/or stakeholder mapping matrix, the process owners and areas impacted by the changes, in order to disclose in a timely manner the measures and/or modifications required within the established terms and deadlines.

- Communication plan: define the content and materials required to disseminate the changes through any of the following channels: the Virtual Link in the Process Library, where documents that have been redesigned, designed, improved, or updated are consolidated; and communication mailboxes addressed to all Bank employees, such as “Actualízate,” “Siempre Intranet,” among others.

- Monitoring and supervision: carried out through the evaluation of controls and system performance.

11. CULTURE

11.1 COMMUNICATION PLAN

Recognizing that effective communication is a fundamental element for the implementation, internalization, maintenance, and sustainability of the Criminal and Ethical Compliance System, Banco Popular defines an annual communication plan aimed at promoting and strengthening the culture of this system, as well as raising employee awareness of the importance of preventing, reporting, and detecting events related to money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, national and transnational bribery, corruption, and internal fraud.

The communication plan includes internal campaigns, support materials, written communications, emails, among others, through which relevant aspects of this management system, its related guidelines, and the importance of internal control are emphasized.

11.2 TRAINING AND EDUCATION

As part of the onboarding process for new employees, and at least annually thereafter, training and/or updates on the Criminal and Ethical Compliance Management System are conducted, covering, for example:

- Banco Popular’s commitment to strict compliance with the Compliance obligations set forth in this policy.

- Events or conduct that may constitute national and/or transnational bribery, corruption, money laundering, terrorist financing, and/or financing of the proliferation of weapons of mass destruction.

- The mechanisms through which a report can be filed and anonymity is guaranteed.

- The consequences of committing acts of national and/or transnational bribery, corruption, facilitating money laundering or terrorist financing, or engaging in unethical behavior, as well as the disciplinary sanctions these acts entail.

- Training and development activities are carried out on an ongoing basis, either virtually or in person, and are directed at key employees involved in Banco Popular's Criminal and Ethical Compliance Management System, with the purpose of strengthening concepts and ensuring the continuity and sustainability of the system.

- The team responsible for implementing and continuously improving the Criminal and Ethical Compliance Management System receives training through self-learning, synchronous sessions led by the Compliance Management Office team, and participation in national and international forums and workshops on money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, bribery, and corruption.

12. CONTINUOUS IMPROVEMENT

Banco Popular recognizes that a key success factor for the continuous improvement of the Criminal and Ethical Compliance Management System is the identification of performance deviations and the collection of feedback on system performance through the following mechanisms:

- Results of control effectiveness assessments.
- Results of system effectiveness indicator evaluations.
- Results of internal system audits.
- Results of the internal audit (Comptroller) assessment of the SARLAFT and ABAC risk management and administration systems.
- Periodic sessions with Regional Managers.
- Risk occurrence reports in the Monitor Plus ORM tool.
- Training and development sessions.
- Improvement opportunities and their respective impacts are evaluated and incorporated into policies and processes, as applicable, in coordination with process owners. They are communicated in accordance with the change management methodology and the disclosure process established by the Bank.

13. SYSTEM PERFORMANCE EVALUATION

The performance and effectiveness of the Criminal and Ethical Compliance Management System are evaluated through primary and secondary SARLAFT and ABAC indicators designed to monitor and track system performance over a defined period.

The indicators are documented in the Risk Appetite Framework and the Risk Management Framework and are reported at the established frequency to the Non-Financial Risk Committee and the Board of Directors, which review the results presented and, if necessary, require the implementation of corrective actions.

To assess the specific performance of the areas involved in the implementation of the Criminal and Ethical Compliance Management System, SIAR indicators are measured. These indicators are formalized in the Risk Appetite Statement (RAS), approved by the Non-Financial Risk Committee, and shared with Senior Management for decision-making, as deemed appropriate.

14. INTERNAL AUDIT OF THE SYSTEM

Banco Popular, through the Compliance Management Office under the Risk Vice Presidency, has designated a specific internal audit function for compliance with ISO 37301 Compliance Management Systems, as well as NTC 6671 Criminal and Ethical Compliance Management System, limited to the prevention and detection of events related to money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, bribery, corruption, and internal fraud. This audit is performed annually, following the audit framework established under ISO 19011.

15. INTERNAL AUDIT OF THE SYSTEM

The respective manuals of the SARLAFT and ABAC risk administration and management systems, as well as the Code of Ethics and Conduct, set out the specific guidelines, in addition to those included in this policy, required to ensure the proper functioning of the Criminal and Ethical Compliance Management System.

16. ANTI-RETALIATION AND PRESUMPTION OF

GOOD FAITH

Banco Popular seeks to ensure protection against retaliation toward any employee, executive, or third party who reports an actual or potential event involving national and/or transnational bribery, corruption, internal fraud, money laundering, terrorist financing, and financing of the proliferation of weapons of mass destruction, or who provides information in good faith regarding unethical conduct or cooperates with a duly authorized investigation.

Any act of retaliation would violate the fundamental obligation of all Banco Popular employees to act with the highest level of efficiency, competence, and integrity, as well as to fulfill their duties and perform in the manner most favorable to the interests of the company.

It is sufficient for employees to act in good faith and have reasonable grounds to believe that a potential event of fraud, bribery, and/or corruption has occurred, or that there has been a possible breach of the ethical policies of each entity. Depending on the circumstances and to the extent possible, efforts should be made to provide evidence or accurate information that supports the conclusion that unethical conduct or an act of fraud, bribery, and/or corruption exists.

Individuals who believe they have been subject to retaliation must report all available information and documentation directly to the Ethics and Conduct Committee through the mechanisms defined below.

If retaliation is confirmed against any person who has reported an act of corruption or non-compliance with ethical policies, Banco Popular and its Subsidiary Entities, as applicable, must take the appropriate and necessary measures to remedy the negative consequences resulting from such retaliation. Any person who has engaged in retaliation, where its existence is demonstrated through an investigation, may be subject to administrative or disciplinary measures, without prejudice to any legal actions that may apply.

17. REPORTING CHANNELS

Banco Popular has a communication channel through which employees may freely and voluntarily report any potential corruption event. The Banco Popular Ethics Line is available to employees through the intranet of Banco Popular and its subsidiary entities.

This channel is also available on the Banco Popular website for suppliers, contractors, and other stakeholders, with the purpose of promoting compliance with the highest ethical standards, as well as preventing potential corruption events, misconduct, and irregular situations that could affect the Bank and the economic agents that interact with it.

Reports received through the Ethics Line will be handled in accordance with the provisions established in the Code of Ethics and Conduct and the Regulations of the Ethics and Conduct Committee.

18. DISCIPLINARY MEASURES

Any Bank employee who fails to comply with any of the control mechanisms established in this policy may be subject to disciplinary sanctions. If such non-compliance is determined to constitute a serious breach, the employee's employment contract shall be terminated in accordance with the Internal Work Regulations and the provisions set forth in the Employment Contract regarding the employee's obligations, without prejudice to any legal actions that may apply.

The sanctioning procedures applicable to cases of non-compliance with this Policy and the Code of Ethics and Conduct are set out in the Internal Work Regulations.

19. ETHICS AND CONDUCT COMMITTEE REGULATIONS

In addition to what is described in this document, annex A-174-00108 Ethics and Conduct Committee Regulations was created, establishing the framework for the operation of the Committee, which is constituted as the highest authority responsible for addressing matters that deviate from the ethical behavior promoted by the Bank.

CHANGE LOG

Version	Publication Date	Description of the Change
1	11/10/2024	This document was created with the objective of ensuring compliance with applicable national and international regulatory requirements, as well as corporate governance guidelines. As such, it establishes principles of ethics and transparency that shall guide the actions of the Bank and all related parties.