

HUMAN RIGHTS POLICY IN GRUPO BANCOLOMBIA

In Grupo Bancolombia we are committed to protecting, respecting and remedying human rights by complying with the provisions of its universal charter, including international humanitarian law, the ILO and the regulations of the countries where we have presence.

We seek to be generators of social, economic and environmental value, for this reason we reaffirm our commitment through initiatives that promote our purpose, sustainable development to achieve well-being of all.

Objective: This policy includes our commitments to our relationship groups, to prevent any of our procedures, activities or operations from having a negative impact on human rights of the people in the organization or third parties who relate to the group.

Scope: Relationship with our employees, our supply chain, our customers, the communities, the authorities and all those who work in Grupo Bancolombia. This is without prejudice related to the fact that the application of this policy is conditioned by the institutional and regulatory context of each country where we are present.

Grupo Bancolombia and its employees human rights: Our team is the fundamental pillar of the corporate strategy of Movimiento B, for them, we are committed to:

- Avoid discriminatory practices or those that affect the dignity of people, providing them with a decent, safe and healthy work environment. Complying with our Diversity, Equity and Inclusion policy, to guarantee the right to non-discrimination in the development of our activities.
- Offer employees a work environment free of any form of harassment, abuse, intimidation or violence in any of its manifestations. Complying with the policy of Promoting Healthy Coexistence and Preventing All Forms of Workplace Harassment.
- We will guarantee in our operations actions are implemented, within our social role, to prevent and combat trafficking in people, as well as to cooperate with the competent entities of the countries where we are present, so that victims are protected and helped with full respect for their human rights.
- Reject all forms of forced or compulsory labor and face the situations that generate it.
- Ensure that in none of our activities there are cases of violation of children's rights and verify in the hiring processes of employees, that all of them exceed the minimum age to work according to the labor standards of each country. As well as establish Human Rights Policy CDE Sustainability and Wellness verification processes in the supply chain in the field of child labor and implement, in those cases where necessary, measures to ensure their total and complete elimination.

- Comply with the labor legislation in force in each of the jurisdictions where we operate, with international labor standards and other legal and regulatory provisions of labor nature.
- Offer employees a safe and healthy work environment by adopting advanced standards and procedures in occupational health and prevention of occupational risks, from compliance with the legal requirements that, in each case, are applicable.
- Respect employees' right freedom of association and collective bargaining.
- Remunerate employees in a dignified and equitable manner, adjusted to their functions, responsibilities and abilities; aligned with the applicable legislation and with the conditions of the labor markets where we have presence, including employing third parties, suppliers and contractors of the supply chain. In addition to implementing processes to guarantee adequate remuneration in this area.
- Guarantee the right of employees to rest considering the labor legislation in force in each country where we operate. In the absence of a legal framework, employment conditions guaranteeing the aforementioned right shall be maintained. In addition, facilitate, as possible, flexible working practices, recognizing the need of employees to harmony between work and personal spaces.

Grupo Bancolombia and its commitment to suppliers, contractors and collaborating companies: Our commitment to human rights throughout the supply chain (suppliers, contractors and collaborating companies) is aimed at:

- Disseminate this human rights policy among our suppliers, contractors or collaborating companies, especially among those whose origin, activity or relevance to the group recommends it.
- Promote and encourage suppliers, contractors and collaborating companies to formalize their public commitment to human rights.
- Include specific clauses of respect for human rights in contracts established with suppliers and contractors.
- Establish mechanisms to highlight possible gaps among its suppliers, contractors and collaborating companies, especially in those environments where the risk is higher.
- Evaluate the continuity of business relationships with those suppliers, contractors and Human Rights Policy CDE Sustainability and Wellness collaborating companies that have been found to violate human rights and especially those that refer to conduct contrary to this policy. Grupo Bancolombia will dialogue with its commercial partners

to analyze the causes of the breaches that have occurred and will promote the repair, if necessary, as well as the implementation of the necessary corrective actions.

Grupo Bancolombia and its commitment to community's rights: We understand that our commitment to human rights must also reach those people who are affected or could be affected by the development of our activities. In this way, we are committed to:

- Publicly support and promote respect for human rights.
- Develop activities under the premise of minimizing the socio-environmental impact and preserving the health and dignity of people, for this purpose, monitor their impact in these areas in accordance with the guidelines of this Policy.
- Develop actions to promote plans and actions, in accordance with our social role, that contribute to the improvement of social rights, supported under the programs promoted through the Bancolombia Foundation, financial inclusion products or services developed for the most vulnerable populations, or through public-private partnerships and with NGOs.

Grupo Bancolombia and its commitment to the rights of customers and people who may be affected by a project to be financed: We are aware that our commercial activities must respect human rights, so we work with our clients to motivate them to manage the impacts of their activities, encouraging the application of due diligence that allows them to address issues related to human rights in their projects responsibly.

We are committed to:

- Ensure that those projects we finance respect the legal rights of the communities to participate and to be consulted prior to the development of those activities that could have an impact on their lives, in order to seek satisfactory agreements for both parties.
- Foster respect for indigenous communities and ethnic minorities and other traditional ways of life. The customer will be required, in the event that the project or activity may produce adverse impacts on indigenous peoples and / or ethnic minorities, to carry out a process of consultation and informed participation, and in the circumstances that by law or by requirement at the international level, will have to obtain their prior, free and informed consent.
- Promote in customers the existence of constructive relationships between their employees and senior management, fair treatment and the provision of safe and Human Rights Policy CDE Sustainability and Wellness healthy working conditions, non-discrimination and equal opportunities for employees, compliance with the labor legislation of the country where the client is located, protection of people including

vulnerable, such as children, migrants, contractors, subcontractors and supply chain employees; and the prevention of any human rights violations.

- Invite our customers to include, both in the environmental and social impact studies, and in their management systems: i) The participation of the communities that may be affected, ii) To deliver transparent results and iii) That the communities have access, in a timely manner, to the relevant information of the project or activity to be carried out. iv) Ensure that clients have mechanisms to receive concerns and complaints from communities regarding their environmental and social performance that facilitates communication and resolution.
- Promote in our customers the evaluation and minimization of the negative impacts that their activities may generate in the lives and jobs of the people who live around their areas of operation and, in particular, as a result of the socio-environmental impact that the activity could cause.
- Motivate our customers to respect their customer's rights to have a healthy environment and avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing the pollution generated by their activities; encouraging the promotion of sustainable resource use and pollution reduction, protecting and conserving biodiversity, and maintaining the benefits derived from ecosystem services.

Responsibilities in the deployment of this policy:

Considering the issues addressed in this policy, its deployment for employees will be headed by the Corporate Vice Presidency of Human Management, who must ensure its disclosure and compliance in the work environment.

The Business Vice Presidency will be in charge of guaranteeing the focus on customers and users.

Likewise, the Administrative Services Vice Presidency, and other areas responsible for managing the relationship with third parties, allies and suppliers must ensure that they know and act in accordance with what is defined in this policy.

However, the other areas of the organization, as well as each employee, are responsible for respecting this policy and managing the actions they will deploy with the stakeholders with whom they have a relationship.

Evaluation:

The results of compliance in this policy will be reviewed periodically, an activity that will be carried out by the Sustainability area.

Disclosure:

The material advances of this policy will be disclosed to the relationship groups through the official channels established for this purpose, and in any case will be consolidated in the annual results report of Grupo Bancolombia.

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