



GRUPO BANCOLOMBIA'S STAKEHOLDERS POLICY

Version No. 2

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1. INTRODUCTION

We are a leading financial group that sets trends, generates a superior experience for our customers, give pride to our employees and value for our shareholders, in a sustainable way. We generate a positive impact on society, transforming people's lives and, to achieve this, we strengthen our relationship with each of our stakeholders, this meaning any human group that may be affected or affect decisions, policies and in general the performance of the Grupo Bancolombia.

2. OBJECTIVE AND SCOPE

A. Objective

To strengthen the relationship model with our stakeholders, based on best practices for this purpose as proposed by the *Global Reporting Initiative - GRI and Accountability*.

B. Scope

This policy covers all companies, areas and those responsible for the relationship with stakeholders of the Grupo Bancolombia where it is present.

3. PRINCIPLES

Understanding our relationship groups: We rely on the AA1000 Stakeholder Engagement Standard and take advantage of different relationship spaces and dialogue with our stakeholders, to better understand their characteristics, expectations and needs. This practice allows us to offer a more adjusted value proposition and have more and better approaches with each of them, considering aspects such as:

- Type of group to which it belongs
- Geographic location
- Influence they have on our decisions and vice versa
- Current relationship status
- Engagement convenience
- Relevant issues
- Expectations
- Legitimacy

All this information is used by the relationship owners in order to improve the dialogue spaces and engagement with the stakeholders and, most importantly, to meet the expectations they have about our organization.

Method for the relationship groups involvement: The trust relationships that we build with people are the fundamental axis to achieve social prosperity, growth, efficiency and sustainability for the organization. Our structure is not of subordination, but of coordination, which allows us to encourage a collaborative work scheme.

Everyone in the organization has a responsibility to interact with our different audiences and to contribute to build relationships based on trust regardless of hierarchical levels. For this reason, the method is based on the fact that each area of the organization owns the relationship of a specific interest group, due to its direct contact, its role as facilitator and for being in charge of carrying out the attention processes. This scheme applies to both Colombia and all our offshore subsidiaries.

These are some examples of the involvement and engagement method of our stakeholders:

Employees: Service scheme for employees on selection processes, education, scholarships, benefits and compensation. Communication channels, talks, forums and conversation spaces with bosses. Wellness and happiness surveys.

Customers: Interaction channels such as the call center and support lines for claims and complaints. Advertising campaigns, satisfaction surveys, products/services co-creation, Relationship of the commercial team in subsidiaries and financial education talks and other topics through social networks.

Shareholders and investors: Information sessions, meetings, consultancies, economic research website and annual shareholders meeting.

Vendors: Annual Vendor meeting, media, meetings, talks and forums, evaluations of social and environmental practices and risk assessments.

Authorities and regulatory entity: Permanent dialogue to comply with standards and regulatory requirements.

Community: Development of social and environmental programs, corporate volunteer programs, research of social and environmental needs through the Fundación Bancolombia operators, dialogue with business advisors in the different regions where we are present, media.

Additionally, we carry out inquiries and dialogues with the different stakeholders, in order to know their expectations, preferences and the communication channels through which they wish to maintain close relationships with us and obtain more information on the selected topics defined as the most relevant for each one of them.

Effective Involvement: We have assigned to our stakeholders one or several areas responsible for managing the relationship, to identify the risks and opportunities that may arise, to have direct contact with them and to obtain feedback on issues such as: processes, complaints, claims, requirements, services, among others.

The Sustainability Department is responsible for making the materiality inquiry, the Corporate Communications Department for making the reputation study, and the Brand and Advertising Department for making the Brand Audit. Once these investigations are carried out, a meeting between the three areas is scheduled to identify the expectations, interests and perceptions that our stakeholders have to work proactively with the areas that own the relationship, in the aspects defined as the most important.

In this way, the stakeholders have different communication channels with our organization that allows us to strengthen trust and meet their expectations.

Evaluate the materiality of sustainability issues: The Sustainability Department is the area in charge of inquiring the stakeholders, reviewing the research and materiality reports, as well as prioritizing the relevant issues and defining the relationship strategies with each of them. Once this information is available, the Sustainability Department holds a meeting with the areas that own the relationship, so that each one approves and manages the strategies defined with the stakeholders.

Measurement of stakeholder participation success: To measure the participation of our

relationship groups, we carry out different studies and investigations which are conducted periodically:

- **Materiality inquiry:** In order to promote transparency, communication and dialogue as differential elements when it comes to enhancing the sustainability of our organization in the long term, it is necessary to identify the expectations of our relationship groups to promote their integration with the strategic approach of the company.
- **Brand Audit:** It helps us determine the real situation and perception that the Bancolombia brand has in front of our stakeholders, especially customers and competitors.
- **Reputation Rate:** It is a study that allows us to define the perception that different stakeholders have formed over time and know how they compare us to other competitors, in order to proactively manage the relevant issues that we have defined in the organization and that have a direct impact on reputation.
- **Customer satisfaction:** It allows us to know how the customer experiences have been with us.
- **Net Promoter Score (NPS):** This tool allows us to measure the degree of loyalty and recommendation of our customers.
- **Employee Wellness and Happiness Rate:** It allows us to know the happiness and well-being perception that collaborators have, identify and validate the factors that determine happiness and well-being in our organization, establish alerts and relevant aspects to consider, related to people's happiness and well-being.
- **Complaints, claims and institutional requirements:** This channel allows us to know the level of disagreement in the processes and in the attention given to customers and non-customers.

4. GUIDELINES

The implementation of this policy considers the following procedures, which seek to manage the opportunities that arise from a better relationship with our stakeholders:

4.1. Identification of stakeholders: Stakeholders will be identified from three attributes:

- **Urgency:** It is related with the sensitivity of each stakeholder in front of the delays in the attention to their requirements and the importance we grant to said group.
- **Power:** It refers to the faculty that a stakeholder has to impose their will or their ability on us to create an effect on our organization.
- **Legitimacy:** It refers to the actions of a stakeholder that are desirable, suitable or appropriate within a social system of rules, values and beliefs.

When a human group meets these attributes, with time it will be considered a stakeholder for the Grupo Bancolombia. Those responsible for managing the relationship with each human group will be responsible for identifying them as a stakeholder and informing the Sustainability area of this finding for its management.

4.2. Prioritization: Each stakeholder should be prioritized by the Sustainability area. For this purpose, the methodology proposed by the Global Reporting Initiative will be used, which results in the level of relationship to be established with each interest group. In this activity the areas responsible for the relationship with the human group participate and the result is presented by the Sustainability area to the Basic Committee of Presidency Support in the duties of the Sustainability Committee.

4.3. Materiality: Stakeholders will be enquired on the relevant issues for the Grupo Bancolombia, seeking to identify which are important to them. From these queries you will get the topics that are material, that is, relevant for both parties. This activity will be led by the sustainability area with the accompaniment of the areas responsible for the relationship with each stakeholder. The results will be presented by the Sustainability area to the area leaders accountable of the relationship and in the Basic Committee of Presidency Support in the duties of the Sustainability Committee.

4.4. Linking: The development of material issues may involve the linking of stakeholders in the implementation of the corporate strategy, for which the area responsible for the relationship will define the action plans to work together and inform them to the Sustainability area for their acknowledgement.

4.5. Report: The areas responsible for the relationship with the human group and the Sustainability area will define the form of reporting and disclosing with each stakeholder, once the material issues are determined as follows:

- Keep passive: No relationship - no goal.
- To keep track of: The views of the stakeholders is tracked generally using public media.
- Report: Inform or instruct the stakeholder on the material issue.
- Perform transactions: Contractual relationships or agreements and associations.
- Inquire: Obtain the opinion of the stakeholder to inform internal decisions.
- Summon: Work directly with the Stakeholders to ensure that they understand their concerns well and that they are considered in the decisions.
- Collaborate: Partner or establish a network to develop a topic.
- Delegate: Delegate the decision making on a particular topic to the stakeholders.

4.6. Frequency: queries with stakeholders will be held every two years.

4.7. Communication of results to stakeholders: The Annual Shareholders' Meeting, the website and our annual sustainability report, are the primary sources of information that account for our economic, social and environmental management. In addition to this, we also rely on the interests and expectations of each stakeholder to define a more personalized communication, which contains the relevant information for each of them. In this way the effectiveness of the disclosure of the results is greater for each stakeholder. The results are also disclosed through the relationship owners in the contact spaces with them.

5. LIABILITIES IN THE IMPLEMENTATION OF THIS POLICY

Considering the issues addressed in this policy, its deployment will be at the head of the Sustainability areas and those that manage relationship with the identified stakeholders.

6. MONITORING

The results of compliance with this policy will be reviewed frequently, at least annually, activity that

will be carried out by the Sustainability Management.

7. POLICY DISCLOSURE

The material advances of this policy will be disclosed to the stakeholders through the official channels established for this purpose, and in any case, they will be consolidated in the annual management report.

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