

CODE OF ETHICS AND CONDUCT

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1. INTRODUCTION

BANCO FINANDINA S.A. BIC, hereinafter referred to as BANK or FINANDINA, is a credit institution whose activities and development of its corporate purpose are based on compliance with legal regulations and the ethical and moral principles of the Colombian Financial System. The ethical behavior of the BANK is an attribute valued by investors, customers, shareholders, employees and the public in general, so it is of the utmost importance to describe the conduct to be followed by the administrators, senior management and in general by all employees of the BANK, which seeks to promote and reinforce the culture of doing things correctly, always acting on the basis of the law and under the principle of good faith. This Code of Ethics and Conduct is a tool that helps to ensure that the principles and values of the BANK are clear, understandable and mandatory for its managers and employees. It is important to remember that all activities carried out by the BANK and its employees must strictly adhere to the constitutional, legal, statutory and regulatory mandates, in order to protect the reliability, credibility and security of FINANDINA. This code will be disclosed to all employees and managers of the BANK.

2. COMPLIANCE WITH LAWS

The BANK complies with the legal mandates, for which purpose the directors and employees must be duly updated on the legal provisions pertaining to the financial activity and others that may be applicable to it. The BANK maintains control, follow-up and auditing programs in order to verify strict compliance with legal regulations and internal policies.

3. VALUES AND GUIDING PRINCIPLES

3.1 VALUES

The following values guide the correct behavior of the BANK's officers and directors:

Respect: Value the interests, needs and expectations of the different stakeholders involved in the BANK's activities.

Responsibility: To fully comply with the commitments acquired in the development of the BANK's corporate purpose.

Collaboration: To add efforts and talents for the professional growth of individuals and the BANK.

Honesty: To work with transparency, honesty and loyalty to generate trust and credibility with co-workers and financial consumers.

Fairness: To act correctly and fairly in all relationships between the BANK and the financial consumer, in accordance with the applicable internal and external rules.

Service: To generate positive experiences for financial consumers, with each employee assuming his or her role and responsibility with passion and commitment.

3.2 PRINCIPLES

As guidelines to be taken into account in the behavior and conduct in the exercise of the financial activity, and based on the principle of good faith, the following guiding principles are established:

Loyalty: This is understood as the obligation of employees to act always in accordance with the values and guiding principles of the BANK and for its benefit, and likewise to act in an integral, frank, faithful and objective manner in relation to all interested parties involved in the operation and banking activity.

Professionalism: It consists of acting in a serious, objective and diligent manner, with the purpose of doing a constant and conscientious job. Likewise, to act with skill, competence and good judgment for the development of its functions, maintaining a proper and adequate conduct inside and outside the BANK.

Transparency: Consists of acting in a clear and transparent manner in relations with interested parties, especially in the relationship with financial consumers, so that they can make decisions duly informed and documented of the conditions under which they will contract their services.

Confidentiality: Refers to the obligation not to disclose information or deliver documentation of the BANK's financial consumers, which cannot be known by third parties due to the restrictions of banking confidentiality, observing the exceptions provided by the Constitution and the law. In this sense, administrators and employees have the duty and responsibility to act in accordance with information security standards.

Compliance with Regulations: Consists of the obligation to comply with all legal and regulatory provisions applicable to the activity carried out by the BANK and to refrain from any practice prohibited or restricted by law and regulations.

Primacy of Ethical Principles: The administration, senior management and all employees of the BANK shall first and foremost observe ethical and moral principles in the achievement of business goals and objectives.

Fair treatment: This refers to the attitudes and behavior that the organization and each of its employees must observe in their relations with financial consumers, seeking the elimination of barriers, the quality of information and attention to the customer's needs throughout the life cycle of products and services.

4. SCOPE OF APPLICATION

This Code of Ethics and Conduct shall apply to the directors, officers and employees of the BANK.

5. RULES GOVERNING CONDUCT IN THE BANK

5.1 PROPER HANDLING OF RELATIONS WITHIN THE BANK

Good judgment and restraint must be exercised to avoid misinterpretation or adverse effects on the reputation of the organization or its directors, officers and employees. The BANK does not seek to gain profit or advantage through the improper use of courtesies or inducements in business dealings. In customer relations, fairness, security, clarity and transparency must prevail, without granting unjustified special benefits. In this regard, it is incumbent upon the BANK's managers and employees:

- a. Provide the financial consumer with true, sufficient, clear and timely information, so that he/she may know his/her rights and obligations.
- b. Explain to the financial consumer with clarity, precision and transparency the conditions under which he/she will contract any service from the BANK.

- c. To attend to the requests, complaints and claims of financial consumers in an efficient and timely manner, seeking to resolve their concerns and solve, as far as possible, the inconveniences they raise.

5.2 CONFLICTS OF INTEREST

A conflict of interest is understood to be the situation in which an employee, director or officer is faced with behavioral alternatives when his or her private interests may prevail over his or her legal or contractual obligations, or when his or her interests are in conflict with the interests of the person he or she represents.

5.2.1 Purpose.

The purpose of this regulation is to establish policies and procedures aimed at detecting, preventing and managing possible conflicts of interest that may arise in the development of the corporate purpose and activities of the BANK.

5.2.2 General Policy.

The directors, officers and employees of the BANK shall refrain from participating by themselves or through an intermediary in personal interest or third parties in acts in respect of which a conflict of interest may arise. Doubt as to the configuration of a possible conflict of interest does not exempt them from the obligation to abstain from participating in the activities that may generate the possible conflict.

5.2.3 Rules and situations that must be taken into account to avoid the occurrence of a conflict of interest.

The following rules and situations are behaviors, conducts or facts that may prevent the occurrence of conflicts of interest, notwithstanding that there may be other situations not contemplated:

- a. Act equitably without regard to personal or third party benefits.
- b. To render the contracted services without expecting any remuneration other than that agreed with the BANK.
- c. Avoid acts that harm the work, the reputation of the BANK's employees, managers, directors, officers and financial consumers.
- d. Refrain from accepting gifts, attentions, price concessions or other preferential treatment from customers or suppliers, which may result in reciprocal special concessions.
- e. Refrain from using the name of the BANK's financial consumers for own business.
- f. Refrain from offering their services or professional expertise to the financial consumer.
- g. Refrain from receiving money from suppliers, financial consumers, employees or any third party, no matter how small the amount.
- h. Refrain from engaging in situations in which their personal interests create any conflict with their relationship with the BANK.
- i. Refrain from using or soliciting the physical resources of the BANK for their own or third parties' benefit.
- j. Refrain from arranging a service provided by the BANK for any family member or for any company in which the employee or any family member is associated or has any interest. Family is defined as spouses, permanent partners, or relatives up to the second degree of consanguinity, second degree of affinity or sole civil partner.
- k. Refrain from guaranteeing the outcome of an application or business transaction.
- l. Refrain from granting discounts, reductions, reductions or exemptions of rates or fees, based on reasons of friendship or kinship.
- m. Refrain from using, for the benefit of others, the advantages that the BANK grants exclusively to its employees.

Paragraph: When a situation arises that may generate a conflict of interest, the interested party must disclose the situation and act in accordance with the provisions of this code.

5.2.4 Situations and conducts that generate conflicts of interest

Notwithstanding the fact that there may be other conducts that generate conflicts of interest, some situations that could be considered as such are listed below:

- a. The contracting or acquisition of fixed assets by the BANK when those who participate in the analysis or making of the respective decision are the owners of the assets, or their spouses, permanent partners, or relatives within the second degree of consanguinity, second degree of affinity or sole civil partner.
- b. The acquisition or contracting by the BANK of fixed assets from legal entities, with respect to which the administrator or employee of the BANK participating in the analysis or decision making is a partner of the legal entity in a percentage of participation equal to or greater than ten percent (10%) of the capital stock, or is the spouse, permanent partner or relative up to the second degree of consanguinity, second degree of affinity or sole civil partner holding ten percent (10%) or more of the capital stock, or who is the beneficial owner of the shares or participations of the company.
- c. The analysis and approval of financing operations requested by natural persons who are spouses, permanent partners or relatives within the second degree of consanguinity, second of affinity or sole civil partner, of the person participating in the analysis and/or approval process.
- d. Decisions related to the appointment of directors or legal representatives when the person making the decision is part of the list of candidates for such positions, or in which natural persons who are spouses, permanent partners or relatives within the second degree of consanguinity, second degree of affinity or sole civil partner of the person making the decision for the designation or appointment of the respective position participate.
- e. The negotiation of contracts.

5.2.5 Duties of the Administrators

The “administrators must act in good faith, with loyalty and with the diligence of a good businessman. Their actions shall be carried out in the interest of the corporation, also taking into account the interests of its associates.” In the performance of their duties, the administrators must comply with the duties set forth in Article 23 of Law 222 of 1995, and additionally:

- a. To safeguard and protect the commercial and industrial reserve of the BANK.
- b. Refrain from acquiring or benefiting from the business they represent, for whom they have the status of agents.
- c. Refrain from being a counterparty of the principal or principal's principal.
- d. To abstain from contracting in their own name or as representative of a third party, unless expressly authorized by the principal.
- e. Avoid any situation that may give rise to a conflict between personal interests and those of the BANK in contracts with financial consumers, suppliers, contractors, employees and competitors.
- f. Promptly report any situation that may involve a conflict of interest due to family or personal relationships, which may prevent acting objectively, solely and exclusively in the interest of the BANK.
- g. The administrators and directors must inform the Board of Directors of any direct or indirect relationships among themselves, or with other entities belonging to the economic group to which the BANK belongs, that may result in a conflict of interest.

5.2.6 Procedure for Resolution and Disclosure of Conflicts of Interest

It is the duty of the administrator, officer or employee of the BANK to analyze each particular situation in order to establish whether there is a conduct or situation that gives rise to a conflict of interest. If so, the following procedure must be followed:

- a. The administrator, officer or employee of the BANK shall, as a general rule, refrain from participating in the situation or event that may give rise to the conflict of interest.
- b. Inform their immediate superiors of the existence of the possible conflict of interest in which they may be involved as a consequence of family or personal relationships.
- c. Inform the Board of Directors at the next meeting held by this body, when the person who may be faced with a conflict of interest is a director.

Paragraph: In any case, in the event of doubt regarding the possible existence of a conflict of interest, it shall be obliged to proceed as if it existed.

6. PROPER CONTROL AND USE OF ASSETS

It is the responsibility of all BANK employees to control and properly use the BANK's assets, including physical and electronic information. This involves protecting property and other assets against unauthorized use and movement, as well as against loss due to criminal acts or breach of trust. All employees must refrain from using the physical resources of the BANK for their own benefit or that of third parties. The commitment to loyalty must prevail; it is the duty of each employee to report any fact directed against the integrity of the BANK and its assets, of which he/she becomes aware.

7. CULTURE OF DUE ATTENTION, FAIR TREATMENT, PROTECTION, RESPECT AND SERVICE TO FINANCIAL CONSUMERS.

All instances of the BANK must strive for the consolidation of a culture of due attention, fair treatment, protection, respect and service to financial consumers. Finandina will provide them with adequate information, and will strengthen the procedures for the attention of their complaints, petitions and claims, guaranteeing at all times the protection of their rights. This includes respect for the principles contained in Article 3 of Law 1328 of 2009, especially those of due diligence, information, responsibility in the processing of complaints, management of conflicts of interest and education for the financial consumer.

Consequently, fair treatment will be guaranteed at all stages of the life cycle of the products and services offered, ensuring strict compliance with the duties of advice, information, and due attention, as well as the promotion of financial education; avoiding real or potential affectations to the rights of the financial consumer.

8. BEHAVIOR AND PERFORMANCE AT WORK

All activities in charge of a manager or employee must be attended by them with the highest degree of reliability, timeliness and diligence. In this sense, the BANK's officers and employees shall:

- a. Serve financial consumers promptly, respectfully, tolerantly and equally.
- b. Perform in an effective, efficient and satisfactory manner, in such a way that the proposed institutional objectives are met, without deviating from legal mandates and ethical principles.
- c. To take advantage of all types of training provided by the BANK, making the best use of it.
- d. To be familiar with the BANK's regulations and guidelines and therefore it is their obligation to read and apply them.
- e. Maintain proper conduct in all activities of their daily life, in such a way that it does not deteriorate the image of the BANK or undermine the proper fulfillment of their responsibilities.
- f. Complying with the commitments, meetings and delivery of results proper to the position and functions he/she performs.

- g. Treat financial consumers, co-workers, suppliers and other stakeholders without discrimination of race, gender, religion, physical or health limitations, sexual preference or nationality.
- h. Speak well of the BANK and its brand, always seeking to promote and exalt it.
- i. To be prudent in verbal and non-verbal behavior and language, inside and outside the BANK.

Paragraph: The BANK shall establish an incentive policy for officers, managers and third parties, which shall not affect the rights of financial consumers.

9. CORRECT USE OF ATTRIBUTIONS

All employees, managers and directors of the BANK shall fully comply with the regulations, rules, policies and powers that regulate the BANK's services. It is important to consider that the BANK grants authority to employees according to the position they hold, for this reason it is forbidden for an employee to abuse authority, either for his own benefit or that of third parties, or to the detriment of third parties or the BANK. Every employee has a high degree of responsibility not only in what he/she commits with his/her signature when authorizing or certifying, but also in everything he/she submits and recommends to a superior body for approval or ratification.

10. THE COMMITMENT TO REMEDY THE ERROR OF OTHERS

In case of detecting an error or poor implementation of the BANK's procedures, and that such error directly or indirectly benefits an employee or a third party, it is a duty to immediately communicate it to any hierarchical superior, without this entitling the employee to receive money, remuneration or compensation in addition to those that the BANK was obliged to pay, nor does it exempt the employee from liability for the consequences of not timely notice of the same.

11. ADMINISTRATION AND MANAGEMENT OF EXPENSES

The expenses incurred by the BANK must be consistent with its needs. Therefore, they must be made in accordance with the purchasing policy established by the BANK.

Those who approve expenses are responsible for the reasonableness of the same and for ensuring that the reports are timely, reliable or duly supported with the respective invoices or documentation. Whoever is involved in a possible conflict of interest shall act in accordance with the procedure established in this Code regarding the resolution and treatment of conflicts of interest.

12. HANDLING OF GENERAL, RESTRICTED AND PRIVILEGED INFORMATION

All employees, directors and officers of the BANK shall ensure the confidentiality and integrity of the information of the BANK, its employees and financial consumers. The following are the conducts to be used by the BANK's directors, officers and employees in the proper handling of information:

- a. Be responsible for the proper use of the passwords and keys assigned to them for the performance of their duties, which are for their exclusive, personal and non-transferable use.
- b. To be responsible for the proper use and handling of the information of the BANK and its customers.
- c. To be responsible for compliance with the BANK's policies regarding the proper use of the technological tools provided by the BANK for the performance of their duties.
- d. Refrain from disclosing information of the BANK to third parties, without having the authority or authorization, according to their position and functions.

- e. Refrain from using for personal benefit or that of third parties the information of financial consumers and that of the BANK; therefore, employees must protect the information disclosed to them by them and by the BANK, except in cases where the authorities require it and except in cases where the financial consumer has authorized it, in compliance with the rules governing banking confidentiality and the protection of personal data.
- f. Maintain the confidentiality of information in the workplace, at home, in social engagements and in public places, avoiding making comments that may harm the interests of the BANK, its directors, managers, employees and financial consumers.
- g. Refrain from opening confidential correspondence that is not addressed to them or that they are not authorized to do so.
- h. To inform or bring to the attention of the corresponding authority at the BANK any criminal act and to deliver the pertinent information, if applicable.
- i. Refrain from informing the financial consumer and any other unauthorized person, the reports of suspicious transactions that are made to the Financial Information and Analysis Unit (UIAF), or the corresponding entity, which have full confidentiality.
- j. Keep the confidentiality and reserve of the information of the BANK to which they may have access on the occasion of their functions or work, or by virtue of their position and after the termination of their employment relationship with the BANK.
- k. Refrain from offering inaccurate information or information that does not correspond to the reality of the BANK or financial consumers, altering, distorting the information or affecting the integrity thereof.
- l. Refrain from using privileged information to which it has access for its own direct or indirect benefit, or for the benefit of third parties or to the detriment of third parties.
- m. To comply with the provisions regarding the handling of privileged information regulated by the Code of Ethics and Conduct and the Liquidity Risk Management System Manual, by the employees involved in treasury operations.
- n. Refrain from any conduct that threatens the integrity and security of the BANK, its employees and also the security, confidentiality, integrity and availability of the information.

13. STANDARDS OF CONDUCT FOR THE TREASURY

The actions of the persons involved in the Treasury operations process (Back, Middle and Front Office) are closely linked to public trust and, therefore, must be framed within the principles of good faith, loyalty, honesty, impartiality and integrity that guarantee the transparency and security of treasury operations. The employees subject to these rules shall inform the General Management in writing in a clear and timely manner of the situations that generate conflicts of interest and shall act in such a way as to minimize the possibilities of causing damages to the BANK. When the conflict of interest involves the President or the General Manager, they shall inform the Board of Directors. The obligations of the employees involved in the Treasury operations process (Back, Middle and Front Office) are as follows:

- a. To keep confidential information of a confidential nature that may come to their knowledge in the performance of their duties.
- b. Refrain from disclosing unauthorized information.
- c. Refrain from using privileged information for their own benefit or that of third parties.

14. MANAGEMENT AND HANDLING OF THE ETHICS LINE

Any director, officer or employee must notify the BANK directly or through the ethics hotline or through the e-mail lineaetica@bancofinandina.com, of any act, improper, immoral or dishonest behavior of which he/she becomes aware.

15. DISCIPLINARY AND SANCTIONING REGIME

Managers and employees who have knowledge of violations of legal or internal rules, committed by other employees or managers, must immediately report them to any superior and provide the documents or evidence at their disposal, to apply the corresponding actions; otherwise, it will have implications of sanctioning order in accordance with the disciplinary procedure.

The hierarchical superior who receives information about alleged infractions shall proceed to verify the facts, immediately communicating them to the General Management or the competent body and, if appropriate, the corresponding sanction shall be imposed, if applicable.

The conduct of the Administrators, officers and employees of the BANK that implies violation of the legal norms, the Internal Labor Regulations, the provisions of the employment contract, the regulations, circulars and instructions issued by the BANK, as well as the provisions of this Code, shall give rise to disciplinary sanctions.

The General Manager, through the area managers and directors, and in particular the Human Resources Management, shall monitor compliance with the provisions contained in this Code.

Version approved by the Board of Directors on October 24, 2023.