

HUMAN RIGHTS COMMITMENT

BANCO DAVIVIENDA S.A

1 OBJECTIVE

Set forth the commitment of Banco Davivienda. S.A. to promote and respect human rights, especially those related to our business activity with different Stakeholders.

2 DEFINITIONS:

2.1 **HUMAN RIGHTS:** Are inherent rights of all human beings, without distinction of any kind in terms of race, sex, nationality, ethnic origin, language, religion, or any other condition. Human rights include the right to life and liberty; freedom from slavery and torture; freedom of opinion and speech; education and work, among many others. These rights correspond to all persons, without any discrimination whatsoever[1].

2.2 **STAKEHOLDERS:** According to our Code of Good Governance, we understand stakeholders to be all those persons or groups that are part of BANCO DAVIVIENDA S.A., or that are linked to the actions thereof, or that because of the various activities of the Group's companies, have a relationship with it, and whose common characteristics allow considering them as beneficiaries of the Governance rules. Stakeholders are: Employees, Customers, Suppliers, and the Community.

[1] <http://www.un.org/es/sections/issues-depth/human-rights/index.html>

3 NATIONAL AND INTERNATIONAL REGULATORY BENCHMARKS: This policy is based on universally recognized Human Rights, such as those contained in:

- 3.1 The International Bill of Human Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights).
- 3.2 ILO Declaration on Fundamental Principles and Rights at Work.
- 3.3 The UN Guiding Principles on Business and Human Rights.
- 3.4 Political Constitution of Colombia.
- 3.5 International treaties accepted by the Colombian state.
- 3.6 SFC Regulations - in what is relevant to what is applicable to Human Rights.

4 HUMAN RIGHTS SUBJECT TO PROTECTION. In Banco Davivienda S.A. we care about Human Rights protection, especially about:

- Rights and freedoms without distinction of: race, color, gender, language, religion, political opinion, nationality, economic position, sexual orientation.
- Right to Identity.
- Right to life, security and freedom.
- Labor rights.
- Right to Due Process.
- Right to privacy and honor.
- Right to freedom of thought, conscience and religion.
- Right to freedom of speech.
- Right to freedom of association and collective bargaining.
- Right to work in a safe and healthy environment.
- Right to social security.
- Right to quality of life, leisure time and rest.
- Right to cultural life and recreational activities.

[1] <http://www.un.org/es/sections/issues-depth/human-rights/index.html>

- Elimination of forced and child labor.
- Elimination of discrimination in terms of employment and occupation.
- Right to a Healthy Environment.

5 **FRAMEWORK FOR ACTION.** Compliance with our policy is reflected in the following actions:

- 5.1 Ensure and maintain in our corporate culture a commitment to the guiding principles on Human Rights "to protect, respect, and remedy".
- 5.2 Implement plans and programs aimed at the due fulfilment of human rights.
- 5.3 Identify and assess the possible risks in our relationships with our Stakeholders that may affect the protection of human rights.
- 5.4 Implement plans and programs aimed at mitigating the risks identified in the relationships with our Stakeholders.
- 5.5 Monitor the effectiveness of plans and programs implemented.
- 5.6 Execute communication strategies and Human Rights training.
- 5.7 Annually report on the results of the human rights risk management system.

Through our Higher Purpose **"ENRICH LIFE WITH INTEGRITY"**, we reaffirm our commitment to respect human rights to generate value in social, environmental, and economic dimensions, hand in hand with a human team developing a differentiated value proposition based on innovation, risk management, efficiency, and synergy between companies, thereby achieving our sustainability over time.

Policy approved by the Board of Directors of Banco Davivienda.
May 21, 2019

[1] <http://www.un.org/es/sections/issues-depth/human-rights/index.html>