



On the side of people that make things happen

MANAGEMENT AND SUSTAINABILITY REPORT





Presentation

| GRI 2-1 |

Banco de Occidente is a publicly traded company with securities listed on the Colombian Stock Exchange for ordinary and subordinated bonds. As of December 31, 2025, \$3.20 trillion has been issued and \$3.10 trillion has been placed, of which \$1.41 trillion of Series B bonds linked to the Consumer Price Index (CPI) remain outstanding, with average issuance and maturity terms of 2017 and 2029, respectively. As of the close of 2025, the current issuance and placement program stands at \$12.00 trillion, with an available quota of \$6.00 trillion to meet funding needs. Additionally, Banco de Occidente's shares are listed and traded on the Colombian Stock Exchange as common stock.

Main place of business:

Santiago de Cali, Valle del Cauca.

Main address:

Carrera 4 # 7-61

Glossary

About this report

Introduction
Our Bank and Its
Commitment

- > Message from the President.
- > About Us.
- > Reputation and Recognition.
- > Business Model.

Responsible
Growth
and Comprehensive
Risk Management

- > Financial Overview and Stock Market Performance.
- > We Generate Profitable and Sustainable Growth.
- > Fiscal and tax management.
- > Strategic management of financial and non-financial risks.
- > Environmental and Social Risk Management System (SARAS).
- > We promote sustainable business.
- > Information security, cybersecurity, and system availability.
- > Responsible supply chain management.

Sustainability
Creating Shared Value

- > ESG Strategy and Its Impact.
- > Materiality analysis.

Strong
Governance
and Ethical Leadership

- > Regulatory and Legal Compliance.
- > Ethics and transparency.

Action
for the Planet

- > Emissions Management and Climate Change.
- > Operational eco-efficiency.
- > Protection of biodiversity and ecosystems.

Empowering
People and
Communities

- > Human Capital and Talent Management.
- > Diversity, Equity, and Inclusion.
- > Human Rights.
- > Occupational safety and health.
- > Memorable Customer Experience.
- > Commitment to Communities.

Acknowledgments

Appendices

- > Assurance Letter.
- > ESG Table.
- > TCFD Report.
- > Consolidated / Separate Financial Statements.



Glossary

A

Absenteeism: occurs when an employee fails to report to work or leaves their workplace, whether with or without justification.

ADL Digital LAB: a digital services provider.

Agile Scaling: a methodology for carrying out projects in a flexible, dynamic, and rapid manner to enhance team productivity.

Artificial Intelligence (AI — ARI): This is the technology that enables machines to learn, reason, and perform tasks that normally require human intelligence.

B

Balanced Scorecard: a management tool that applies predictive and balanced performance indicators from the financial, people, process, and customer perspectives within the company.

Banking Correspondent: a channel that provides collection services through third-party partners, under the full responsibility of Banco de Occidente, in order to reach regions where the presence of branches is limited, thereby offering greater availability for customers to make their payments.

Basel: These are the international agreements or recommendations on banking supervision issued by the Basel Committee on Banking Supervision (BCBS).

Biodegradation: the ability of certain materials to break down naturally without human intervention.

Biodiversity: a term that encompasses the living species that provide the Earth's life-support system; a collection of plants, animals, insects, and fish make up the ecosystems that provide us with food, clean water, air, and energy.

Bond: a negotiable security representing a debt. Therefore, it can be said that when an investor purchases a bond, they are lending money to a company. The company issuing the bonds assumes the obligation to repay the bondholder (once the period established in the bond has elapsed) the amount of the investment plus a sum of money as interest (this is the investor's return).

BPO: the outsourcing of business process functions to service providers, whether internal or external to the company.

Braille: A reading and writing system composed of raised dots used by people with visual impairments to understand text through touch with their fingers.

Bre-B: Colombia's interoperable instant payment system, administered by the Central Bank, which enables real-time transfers and payments between users and merchants from different financial institutions using "keys" (e.g., cell phone number, ID number, or email) and/or QR codes.

C

Carbon Footprint: an indicator of the environmental impact of human activities in terms of the number of resources used and generated.

Career Plan: a defined growth path that allows employees to plan their careers at Banco de Occidente in accordance with their skills and expectations. It is integrated with our Corporate University, and we are currently developing learning pathways for each position. The operational and commercial career plans are currently in place.

Carpooling: an English term meaning "to share a vehicle," where several people travel along defined routes to the same destination, with the aim of reducing the use of private vehicles with only one person on board.

CDC: In technology, this stands for Change Data Capture, software that allows for the integration, optimization, and efficient management of databases.

Coaching: Professional training provided to an individual to help them achieve their goals through communication, self-confidence, personal development, and leadership.

Collective Investment Funds: a mechanism or vehicle for saving or managing sums of money or other assets, formed through contributions from a number of identifiable individuals once the fund begins operations. These resources are managed collectively to achieve collective economic results.

Commercial Trust: a legal arrangement whereby a person, known as the settlor, transfers one or more specified assets to another, known as the trustee, who undertakes to manage or dispose of them to fulfill a purpose determined by the settlor, for the benefit of the settlor or a third party known as the beneficiary or trust beneficiary.

Content Hub: a web space where all of the platform's content converges, regardless of format.

Contractor: a person hired by the reporting organization to perform work that would otherwise be performed by an employee, at a workplace controlled by the organization.

Credit Risk: the possibility that one party to a financial contract will be unable to meet its financial obligations; as a result, the other party suffers a loss.

Credit Scoring: a credit assessment methodology that consists of assigning a score to a potential borrower. This is intended to measure the customer's ability to pay.

Critical Talent: high-impact positions that are crucial to achieving the organization's objectives; replacing them entails significant costs, so they are carefully selected from the workforce.

CSAT (Customer Satisfaction Score): This is the metric that measures customer satisfaction with the channel used to submit a request or complete a transaction.



Customers: individuals or companies that purchase, for their own use, products and/or services offered by Banco de Occidente and its subsidiaries.

Cybersecurity: the practice of protecting critical systems and confidential information from potential digital attacks.

D

Dale: a digital wallet from Grupo Aval that allows users to send and receive money, make payments, withdraw cash from ATMs, and top up their balance easily and securely from their cell phone, without the need for a traditional bank account.

Dashboard: A tool or control panel that displays performance indicators to track business objectives and processes.

Dematerialized Promissory Note: a security backing credit transactions that exist in digital form rather than in physical form.

Digital Ratio: In marketing, this refers to the percentage of interested parties who visit a website and complete the process of being promoted.

Disability: Disability is a concept that encompasses the sensory, physical, cognitive, intellectual, psychosocial, and multiple differences a person may have. It is linked to physical, attitudinal, and communication barriers that limit their participation and access to various work, social, and economic settings, among others.

Discharges: the final disposal of liquids into bodies of water, soil, or sewers.

Discrimination: actions or omissions that exclude, harm, or otherwise affect (physically, psychologically, structurally, or through other forms of violence) a person because of their sexual orientation, gender identity, ethnicity, age, disability, place of origin, class, or other distinguishing characteristics.

Diversity: refers to the many ways of being that characterize the groups and societies that make up humanity; it manifests itself in the plurality of identity, social, cultural, ethnic, and religious characteristics, among others, which define each person and add value to society.

Donation: a purely voluntary act by which a natural or legal person provides resources in cash or in kind for the benefit of another, without receiving anything in return.

E

EASPBV: Low-Value Payment System Administrators.

Electric Vehicle: A car or land vehicle that uses electrical energy for mobility and must be connected to a power source.

Electronic Channels: mechanisms or options offered by our Bank to conduct transactions online.

Electronic kiosks: a physical self-service channel that allows users to perform transactions such as payments, inquiries, and withdrawals, among others, using a debit or credit card from Banco de Occidente or Grupo Aval entities.

Emotional benefit: the benefit received by an employee, in addition to their financial compensation, related to their feelings and emotions that create a bond with the company or brand.

Employee: a person who has a direct employment relationship with our Bank through a fixed-term or indefinite employment contract, and who fulfills certain duties in exchange for compensation that includes statutory and non-statutory benefits.

Employee Journey: A metric that tracks an employee's trajectory and performance within the company from their start date to their retirement.

Employer Brand: processes for recruiting, engaging, and retaining talent.

Energy efficiency: the ability to achieve the same or better results using the least possible amount of energy resources.

ESG (Environmental, Social, and Governance): an approach that evaluates how an organization manages its environmental impacts, its relationships with people (employees, customers, the community), and the quality of its corporate governance.

F

Fiduciary Arrangements: a fiduciary arrangement under which one person entrusts one or more specific assets to another without transferring ownership, for the purpose of having the latter fulfill a specific objective, either for the benefit of the settler or a third party.

Finance for Biodiversity: a global initiative that seeks to mobilize the financial sector to support the conservation and restoration of biodiversity through responsible investments and sustainable strategies.

Financed Emissions: greenhouse gas (GHG) emissions resulting from loans.

FINDEV: Canada's development finance institution (DFI), which supports the private sector in developing markets to promote sustainable development.

Franchise: a commercial contract through which a license is granted for the use of a brand and procedures.

Fusiondata: a government entity management system and technological platform of the Attorney General's Office of Colombia.

G

Global Compact: a UN initiative that encourages companies to adopt principles regarding human rights, labor standards, the environment, and anti-corruption to promote sustainability and corporate responsibility.

GPTW Certification: an award granted by the Great Place to Work Institute and Icontec that certifies organizations with high standards of quality in the workplace and highlights the best places to work nationally and internationally.

GRI – Global Reporting Initiative: An international standard that guides organizations in the preparation of sustainability reports, defining how to transparently report their economic, environmental, and social impacts.



H

Hybrid: A work arrangement that allows employees to work from home a few days a week and in the office the rest of the time.

Hybrid Vehicle: A car or land vehicle that combines gasoline or diesel combustion with an electric motor for propulsion.

I

IDB (Inter–American Development Bank): a multilateral organization whose objective is to provide financial solutions for the economic and social development of the region.

INS (Response Satisfaction Index): An indicator that measures customer satisfaction with the quality and clarity of the responses they receive to their requests or inquiries.

L

Licenses: The right to use software or any other creation associated with a programming language.

Liquidity: The ability of a person or company to convert their assets into cash to meet their financial obligations.

Liquidity Risk: the probability of incurring losses due to a lack of sufficient resources to meet assumed obligations.

Loan Reference Rate (LRP): the benchmark interest rate used by commercial banks to set interest rates on loans granted to their most creditworthy customers.

M

Market Risk: potential loss in the value of financial assets caused by adverse changes in the factors that determine their price.

Market Share: in marketing, this refers to the indicator of the organization’s market share or market fraction within a specific segment.

Material efficiency: a metric that compares measures of cost, efficiency, and the flow of raw materials in their consumption, transformation, and disposal to optimize processes.

Materiality: In sustainability management, this refers to the environmental, social, and governance aspects that the organization prioritizes based on their positive or negative impact on its stakeholders.

MSCI Colcap: an index created jointly by MSCI and the Colombian Stock Exchange (BVC), designed to represent the performance of the Colombian stock market and aimed at including a minimum of 25 securities and 20 issuers based on market capitalization, liquidity, and international investment criteria adjusted for free float.

N

Net Stable Funding Ratio (NSFR): corresponds to the ratio between Available Stable Funding (ASF) and Required Stable Funding (RSF), in accordance with the definitions established by the Financial Superintendency of Colombia.

NEXA BPO: a trademark of the subsidiary Ventas y Servicios S.A.

O

Occupational Hazards: a source or situation that can cause injury or harm to health.

Occupational Illness: a work–related injury, ailment, or illness resulting in any of the following: death, days of sick leave, work restrictions or transfer to other positions, fainting, or medical treatment beyond first aid; or a serious injury or illness diagnosed by a physician or other certified healthcare professional, even if it does not result in any of the foregoing.

Omnichannel: refers to all touchpoints in the customer lifecycle—such as websites, social media, real–time chats, emails, and phone calls—working together to ensure that the user’s needs are met quickly and seamlessly.

Open Banking: a model that facilitates the exchange of information among all types of financial institutions through application programming interfaces (APIs). In this model, users are the owners of their financial information; therefore, they decide whether or not to share their data, with the aim of offering new products and services tailored to customer needs.

Operational Risk: the possibility that the entity will incur losses due to deficiencies, failures, or inadequate functioning of processes, technology, infrastructure, or human resources, as well as due to the occurrence of external events associated with these. It includes legal risk.

Organic Content: refers to advertising (ads, news) or content that is distributed through digital media at no cost.

Other Intellectual Property Rights: any other right that recognizes ownership of an invention in accordance with current regulations.

P

Parental Leave: leave granted by the company to employees who become parents. Our Bank grants additional days beyond those required by law.

Patents: an industrial property right that recognizes the invention of a product or process, with an inventive step and industrial applicability.

Payment Gateway: a service that allows merchants to process customer payments through the electronic (online) exchange of data between the seller’s and buyer’s banks, enabling the use of various payment methods (e.g., PSE, credit card, debit card, cash, among others). Additionally, it provides value–added services such as building the merchant’s website, integrating payment buttons via Web Services or APIs, and providing enriched online information.

Pensioner: a person receiving a pension, primarily due to retirement, widowhood, disability, or incapacity.

Pet–Friendly: Offices that allow pets (primarily dogs and cats) to enter and remain on the premises accompanied by their owners so that the owners can carry out their work activities.

Pricing: The process of setting prices for products and services.



Private Equity Funds: closed-end collective investment funds that must allocate at least two-thirds of their investors' contributions to the acquisition of assets or economic rights other than securities registered in the National Registry of Securities and Issuers (RNVE).

Prospects: A person or company that shows interest in what the Bank is offering and becomes the target audience for the company's products or services.

PSE Button: a digital tool that allows our customers to make payments and collect funds virtually and securely.

Public Trust: fiduciary arrangements entered into with public entities in accordance with the regulations applicable to the resources covered by the contract.

R

Ransomware: A type of malware that locks or encrypts data on a device and demands a payment (ransom) to restore access to the data.

Recruitment: the process of hiring or selecting candidates for positions at the Bank.

Recycled PVC: PVC (polyvinyl chloride) plastic material reused by transforming it into new products; in this case, it is used to manufacture physical credit cards that are issued to our customers.

Recycling: The reprocessing of products or product components that have become waste to create new materials.

Retention Plan: consists of the various actions or initiatives implemented by Banco de Occidente to ensure employees remain with the organization for an extended period, thereby strengthening their commitment through access to various salary-related or non-salary benefits.

S

SAES: Special Administrative Service, which provides specialized, client-tailored services in the corporate banking segment, particularly in Banco de Occidente's Government Banking division.

SARLAFT: Anti-Money Laundering, Counter-Terrorism Financing, and Proliferation of Weapons of Mass Destruction Risk Management System, which manages the identification of operational, legal, contagion, and reputational risks; it is included in the Bank's procedures manual.

SASB: Sustainability Accounting Standards Board, an ESG disclosure standard that defines industry-specific indicators for reporting financially material sustainability information to investors.

Secondary Market: In the financial sector, this refers to the buying and selling among investors of securities already issued in the primary market.

Select Segment: A segment of the Bank's and its subsidiaries' customers consisting of their active employees.

Self-managed: when an individual independently carries out the required procedure, managing and executing an activity.

Senior Citizens: adults aged 60 and older; also classified as older adults.

Share of Cash: An indicator that measures the proportion of a customer's cash flow (income and payments/expenses) that passes through and is managed by the Bank, relative to the total volume of their transactions.

Share Of Wallet: An indicator that estimates the proportion of a customer's total financial spending (banking products and services) managed by the Bank, compared to other institutions with which the customer also does business.

Shares: a negotiable security representing a proportional share of a company's equity. It is an equity security; that is, when an investor acquires shares in a company, they become a partner in that company. These instruments grant their holders economic and political rights that can be exercised collectively or individually.

SmartSupervision: The Financial Superintendency's platform for claims management.

SOFR: The SOFR rate has been published by the Federal Reserve Bank of New York since 2018 and reflects the overnight cost of loans secured by repos of U.S. Treasury securities. This rate is based on a diverse and robust market with a large number of participants.

Solar Energy: a renewable energy source produced by the sun's light and heat to generate electricity, lighting, and heating.

Solvency Ratio: corresponds to the ratio between the entity's technical capital and the sum of risk-weighted assets, market risk, and operational risk, in accordance with the definitions established by the Financial Superintendency of Colombia.

Sponsorship: financial support provided to an entity in exchange for advertising and brand visibility.

Stakeholders: individuals or groups of individuals who may be positively or negatively affected by the conduct of our Bank's activities and who also have the capacity to influence such conduct.

Success Factor (SSFF): a cloud-based application that enables the management of data and processes related to Human Resources, such as payroll, training, performance evaluations, leave and vacation requests, etc.

Supplier: an individual or legal entity that offers products or services required by the Bank and establishes a business relationship with the Bank through a contract, invoice, or purchase order.

Supply Chain: a set of activities ranging from the purchase and processing of raw materials to the manufacturing, distribution, and delivery of the product to the end consumer.

Sustainable Mobility: a transportation program for the Bank's employees that aims to reduce CO2 emissions caused by employees' commutes to and from their homes when traveling to our offices to perform their duties, for example: walking, cycling, and using electric cars, among others.



T

Tax Approach: compliance with and application of tax regulations to manage the company’s business, ethical, and social objectives and expectations.

Tax Policy: a policy established by the Bank regarding transparency and accountability in tax obligations.

Telework: a type of employment contract where the employee performs their duties at a location other than the company’s facilities, primarily from home using information technology.

Trademarks: an industrial property right that grants exclusive use of a distinctive sign associated with a good or service.

Turnover: employees who leave the organization voluntarily or due to termination, retirement, or death while on the job.

U

UNEP FI (United Nations Environment Program Finance Initiative): an initiative of the United Nations Environment Program that promotes sustainable financial practices through collaboration between the UN and the financial sector.

V

Virtual classroom: an online education mechanism (teaching and learning) using information and communication technology.

Volunteering: Activities carried out by the organization together with its employees to contribute to various social and/or environmental causes.

W

Wage Ratio: A statistical indicator that determines the relationship between the minimum wage and the average wage of the Bank’s employees.

Waste: anything that a person discards, wishes to discard, or is required to discard.

Webinar: A virtual presentation of courses, conferences, talks, etc., where participants can interact in real time.

Weighted Return: corresponds to the overall return on the portfolio relative to the capital invested and the cash flow at the beginning and end of the investment.

Work Environment Index: indicates the level of achievement reached by the organization and its leaders, summarizing the employees’ experience regarding their work environment.

Workplace Accident: any unforeseen event at work that causes the worker physical or psychological injury, disability, or death.



About this report

| GRI 2-1; 2-2; 2-3; 2-4; 2-5 |

At Banco de Occidente, we view sustainability as a cross-cutting element of our management and the way in which we create value for our stakeholders. In this context, we present the **2025 Management and Sustainability Report**, prepared on an **annual** basis and which outlines the main progress, challenges, and actions undertaken by the Bank during the period from **January 1 to December 31, 2025**. Unless otherwise indicated, the information presented pertains to **Banco de Occidente S.A.** and its main subsidiaries, which are specifically mentioned where applicable.

This report has been prepared in accordance with the **Global Reporting Initiative (GRI)** Standards and is supplemented by other frameworks relevant to the financial sector, such as the **Sustainability Accounting Standards Board (SASB)** sectoral indicators and the recommendations of the **Task Force on Climate-related Financial Disclosures (TCFD)**, as well as in compliance with **Circular 031 of 2021** issued by the Financial Superintendency of Colombia. Additionally, the report details our voluntary sustainability management efforts, in alignment with international initiatives and frameworks such as the ten principles of the **United Nations Global Compact**, the **Sustainable Development Goals (SDGs)**, and our participation in financial sector assessments and benchmarks, including the **Dow Jones Sustainability**

Index (DJSI) and the United Nations Environment Program Finance Initiative (UNEP FI).

The report’s content is structured based on the results of **our updated double materiality analysis**, conducted with the support of Deloitte, which allows us to prioritize our most material topics in terms of impact on both the Bank and the environment. The results of this analysis, as well as the report’s content, were **reviewed and approved by Senior Management and the Board of Directors** as part of the Bank’s sustainability governance mechanisms.

To enhance the credibility of the reported information, the report underwent an independent **limited assurance process** conducted by BDO Audit S.A.S. Additionally, regarding financial information, the Bank is **audited by KPMG S.A.S.**, whose scope and conclusions are detailed in the corresponding appendices.

Throughout the report, the term “Bank” refers to Banco de Occidente S.A., and “Organization” includes the Bank and its main subsidiaries, which are specifically mentioned where applicable.

For inquiries, comments, or requests related to this report or the information presented, please contact us at:

Daniel Lopez
Sustainability Manager
dflopezs@bancodeoccidente.com.co



Introduction:

Our Bank and Its Commitment



Banco de
Occidente

Grupo
AVL



Message from the President

| GRI 2-22 |

In 2025, we celebrate 60 years of history. Six decades **supporting people and businesses across Colombia** from Cali, the city where we were founded, evolving with a presence in the country's various regions, its businesses, and its families. This anniversary is not just a number; it is the confirmation of **a journey built on trust, strength, and long-term vision.**

We are marking our 60th anniversary at a time of consolidation and growth. We closed the year with sustained growth, **net income of \$533.655 billion (+7.81%), and assets of \$82.16 trillion (+13.1%),** reflecting a robust and disciplined business model. Our loan portfolio reached \$51.8 trillion (+4.2%) and deposits \$53.86 trillion (+11.8%), reaffirming the trust of our customers and the market.

But beyond the financial results, 2025 was a year that **reaffirmed who we are.**

For the third consecutive year, we were recognized as the best place to work in Colombia by **Great Place to Work.** This recognition confirms that an organization that cares for its people strengthens its ability to better serve its customers and generate sustainable value over time.

In sustainability, we made decisive progress. For the first time in our history—and in just two years—we were listed in **Standard & Poor's (S&P) Global Sustainability Yearbook in the Members category,**

having achieved 66 points on the Dow Jones Sustainability Index, placing us in the 89th percentile. In addition, we successfully completed the audit of our **Carbon Footprint verified by ICONTEC** and strengthened our ESG strategy with clear **policies on human rights, biodiversity, and climate action.** Sustainability is becoming a structural pillar of risk management and business strategy.

In digital transformation, we further advanced the **modernization of our channels and processes,** strengthened our participation in the instant payments ecosystem and the **use of artificial intelligence** with more than 87 analytical models and over 10 assistants, and expanded digital solutions for individuals and businesses. Today, **more than 205,000 customers** manage their relationship with the Bank through our **digital channels.**

We consolidated our **reputational standing,** climbing 21 positions in the Merco Empresas ranking to **reach 52nd place nationally** and sixth place in the financial sector. We positioned our spokespersons as leaders in the country's financial and economic sectors.

Celebrating 60 years was also a symbolic act: we illuminated our headquarters in Cali as a tribute to the city where we were founded and as a sign of our focus on the future. **That light symbolizes our aspiration to continue being a solid, accessible, and relevant institution for the country's development.**

We are part of Grupo Aval, operate in accordance with international standards, and have maintained **a triple-A (AAA) rating** for the twenty-eighth consecutive year. This consistency reflects the discipline, prudence, and responsibility that guide our actions.

Looking ahead, our commitment is clear: to continue making the development of individuals and their families, business growth, and the sustainable transformation of Colombia a reality. With a personal touch, rigor, and a vision that combines profitability, impact, and purpose.

Thank you to our employees, customers, shareholders, and partners for these 60 years of trust. We will continue moving forward, with the determination of those who understand that our true strength lies in building long-term relationships and consistently supporting our customers in every decision that drives their growth.

Gerardo Silva Castro.
President, Banco de Occidente.





About Us

We are Banco de Occidente, a financial institution with **60 years of experience in Colombia**, committed to the country's economic and social development. Since 1965, when we began operations in Cali, we have supported individuals, businesses, and productive sectors in their projects and decisions, offering financial solutions that meet their needs and contribute to sustainable growth and the creation of value for our stakeholders.

Our history is reflected today in a broad presence across the country, with **more than 168 branches, 13 Credit Centers**, and **269 ATMs** in Colombia, as well as in our international operations through subsidiaries in **Panama and Barbados**. This network allows us to stay close to our customers and respond promptly to the dynamics and needs of the different regions and markets where we operate.

Our purpose guides the way we operate and make decisions: **to make the development of people, the growth of businesses, and the transformation of the country a reality**. Based on this purpose, we seek to build long-term relationships with our customers, drive business development, promote financial inclusion, and contribute to the well-being of the communities where we operate, always acting with responsibility, ethics, and a vision for the future.

As part of the Colombian financial system and Grupo Aval, we conduct our business with a strategic approach that integrates sustainability into our operations. This approach allows us to adapt to a constantly evolving environment, manage risks and opportunities responsibly, and strengthen the trust of our stakeholders.

To achieve our purpose, we are guided by four strategic pillars that define our roadmap and strengthen our ability to generate sustainable value over the long term.

Values that guide our management



Honesty

We build trust through consistency between what we think, say, and do.



Respect

We recognize and value people for their integrity.



Determination

We believe in our ability and talent to make things happen.



Cooperation

We work together to make things happen.

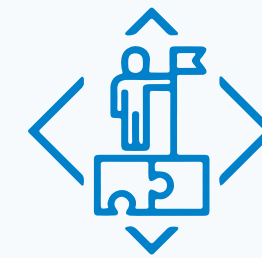


Our strategic pillars





This is how we move forward in 2025



We are leaders

- ✓ We consolidate our leadership in key segments:
 - **SMEs:** 1st in Share of Wallet (28.04%) and Share of Cash (28.48%).
 - **Business:** 2nd in SoW (18.93%) and mid-market corporate (16.20%).
 - **Individuals:** 1st in Share of Wallet for core segments.
 - **Government:** 1st in Checking Accounts (18.27%).
- ✓ We achieved **first place** in the market for point-of-service **partnerships**, strengthening our service reach.
- ✓ We strengthened the **Business Community 2.0**, reaching 110,000 registered users.
- ✓ We implemented a **Preferred Service Model** for elite clients and consolidated the Elite Plus segment, with a differentiated value proposition for independent clients.



We are sustainable

- ✓ We completed the **Carbon Footprint audit**, verified by ICONTEC, and obtained the “**Sello Verde de Verdad**” **certification** for the second consecutive year.
- ✓ We are making progress toward **sustainable mobility**, preventing the emission of more than **31,000 kg of CO₂e**.
- ✓ We completed the **ecological restoration program with WWF**, **planting 30,000 seedlings** in National Natural Parks.
- ✓ We achieved significant progress in our **sustainability performance**, reaching **66 points** (+18 points compared to 2024), placing us in the 89th percentile (5th quintile), a result of coordinated efforts across the Bank's departments.
- ✓ We led dialogue forums such as **Ecos Bogotá** and the **Orinoquia Green and Competitive Summit**, promoting the integration of ESG criteria among clients and productive sectors.
- ✓ We made donations and carried out initiatives in **educational infrastructure in Cali**, benefiting more than **1,700 people**, and we promoted training and employability projects for vulnerable youth.
- ✓ We approved the **Human Rights Policy and the Equity, Diversity, and Inclusion Manifesto**, strengthening our framework for responsible action.
- ✓ We were recognized by the Retorna Group in the “**My Company Also Returns**” category for our **responsible management of post-consumer waste**, where we supported citizen-led collection initiatives and promoted environmental education through publications, cultural events, and social partnerships.



This is how we move forward in 2025



We're Digital

- ✓ We launched digital payroll, international transfers, online remittances, and the Kubo ecosystem, which increases returns for customers with savings accounts and CDs, including digital solutions for businesses
- ✓ We promoted the **instant payments ecosystem**, implementing the low-value Bre-B system with over **325,000 registered keys**.
- ✓ **We revamped the banking portal** and enabled new features in mobile banking, the banking portal, and WhatsApp, facilitating self-service and improving customer experience.
- ✓ We implemented tokenization for **digital wallets** (Google Pay and Apple Pay).
- ✓ We made progress in the adoption of artificial intelligence, with:
 - **+87 analytical models**.
 - **+10 AI assistants/agents**.
 - **180 bots**, strengthening operational efficiency and user experience.



We are in demand

- ✓ We ranked first for the third consecutive year as the **best place to work in Colombia**, as recognized by Great Place to Work.
- ✓ We were recognized as the best bank for women to work at in Colombia.
- ✓ We made progress in remodeling administrative floors, improving workspace.
- ✓ We implemented the mentoring program and launched the Soy Bdeo app, enhancing the employee experience.
- ✓ We promoted continuous learning through La U, with:
 - **+58.000** courses completed.
 - **6.841** employees.
 - **1.300** active family members.
- ✓ We received the **Brandon Hall Group Gold Award** in the learning and development category.





Our History and Legacy

For **60 years**, at Banco de Occidente we have evolved alongside Colombia, supporting the development of people and businesses in a changing environment. Our history is marked by expansion, innovation, a commitment to sustainability, and the continuous transformation of our business, always maintaining closeness and trust as the pillars of our operation.

Foundation and Consolidation

We were founded in **Cali** and took our first steps as a financial institution, consolidating our regional presence and laying the foundations for a banking model.

Growth and Diversification

We expanded our coverage nationwide, opened our first branches outside Cali, and integrated new subsidiaries, strengthening our service portfolio and our national and international reach, including the consolidation of operations in **Panama and Barbados**.

Modernization and Financial Innovation

We pioneered innovative solutions such as the launch of the **Credencial Credit Card** in 1976, strengthened our business units, and advanced the transformation of our brand image, processes, and channels to respond to new market dynamics.

Sustainability, digital transformation, and customer experience

We have established sustainability as a strategic pillar of our business, from historic initiatives such as the **National Ecology Award** in 1993 to the strengthening of our **Sustainability Strategy** in 2021. At the same time, we have accelerated the digitization of our services, implemented new business models, and modernized our branches to enhance customer experience and strengthen our reputation.

To learn more about the key milestones in our history, we invite you to visit the Our History section on the Bank's website.





Our Subsidiaries

| GRI 2-6 |

Banco de Occidente de Panamá



Banco de Occidente de Panamá operates under the **International Banking License** framework and **holds a Securities License** that allows it to offer clients a wide variety of investment portfolios, with a business model focused on **international lending and portfolio placement and raising foreign currency funding**, primarily from Colombia, through time and demand deposits. Its operations strengthen the Bank's international presence and enhance its ability to serve clients with cross-border financial needs.

Operational and Financial Profile

In 2025, the subsidiary consolidated its financial and operational performance, reflecting the strength of its business model and management focused on efficiency and risk management:

- **60 Employees.**
- **1 Branch.**
- **Total assets:** \$4,660,344 million
- **Total liabilities:** \$4,277,235 million
- **Total revenue:** \$ 266.627 million
- **Total expenses:** \$ 204.815 million

*Figures in millions of COP expressed using the December TRM (Exchange rate)..

Key milestones and notable projects

- ✓ **Record net income** over the past ten years.
- ✓ **Maintenance of the highest credit rating (AAA)** awarded by Fitch Ratings.
- ✓ **Record figure** in international portfolio placement.
- ✓ Implementation of the **Securities License**, which allows the bank to offer **investment portfolios** to its clients. This initiative strengthens the value proposition, expands investment alternatives for clients with international operations, and contributes to revenue diversification, while maintaining a prudent approach to risk management and regulatory compliance.

Occidental Bank Barbados



Occidental Bank Barbados is part of the **International Banking License** regime and plays a key role in managing **international loan portfolios and attracting foreign currency deposits**. From Barbados, the subsidiary supports clients engaged in cross-border operations and contributes to the Bank's geographic and financial diversification.

Financial and Operational Performance 2025

- **3 Employees.**
- **1 Branch.**
- **Total assets:** \$ 1.319.203 million
- **Total liabilities:** \$ 1.127.634 million
- **Total revenue:** \$ 79.886 million
- **Total expenses:** \$ 60.098 million

*Figures in millions of COP expressed using the December TRM.

Key milestones and notable projects

- ✓ Consolidation of positive financial results, with a **record of accumulated net income** over the last ten years.
- ✓ **Maintenance of the highest credit rating (AAA)** awarded by Fitch Ratings, reflecting its financial strength and prudent risk management.
- ✓ Achievement of a **historic milestone in international portfolio placement**, strengthening its role within the Bank's regional strategy.
- ✓ Implementation and operation of the **Securities License**, which enables the structuring and offering of investment portfolios for clients with international financial needs.



Nexa BPO

Ventas y Servicios S.A. — Nexa BPO is a commercial services company specializing in the provision of **contact center and BPO** services nationwide, serving entities across various economic sectors. Its operations focus on supporting clients in customer experience management, operational efficiency, and process optimization, leveraging technology, data analytics, and proprietary solutions.

Nexa BPO has a **nationwide presence through 16 offices**.

Strategic Approach

Nexa BPO's strategic plan is structured around objectives aimed at **creating value through customer experience (CX)**, with an emphasis on:

- Differentiation through **innovative**, value-creating **solutions**.
- Use of **advanced technology**, data analytics, and agile development.
- **Robust information security policies** that protect clients' critical processes.
- **Diversification of the client portfolio** and revenue growth, prioritizing competitive margins.

Financial Performance 2025

- **Total assets:** \$ 107.692 million
- **Total liabilities:** \$ 55.328 million
- **Total revenue:** \$ 376.066. million
- **Total expenses:** \$ 374.987 million

*Figures in millions of COP

Key Milestones for 2025

Nexa BPO made significant progress in its management and in integrating sustainability into the business, including:

- ✓ Definition of a **roadmap aligned with its core business**.
- ✓ Design of **ESG indicators** to measure the impact of its strategy.
- ✓ A **7-percentage-point** increase in **process maturity** according to Corficolombiana's measurement.
- ✓ Development of an **inclusive communication protocol**.
- ✓ Launch of **social and environmental volunteer initiatives**.
- ✓ Participation in **sustainability events** and industry best practices.

- ✓ Recognition for **Best Corporate Social Responsibility** in the **Gold category** at the 2025 Interaction Awards.

Notable Projects

- ✓ Organization of **Sustainability Week**.
- ✓ Measurement of emissions associated with the **server infrastructure and communications equipment** at the main data center.
- ✓ First **environmental volunteer initiative**, featuring a tree-planting event that captured approximately **46 tons of CO₂**.
- ✓ Design and development of the **inclusive communication protocol**.

2026 Strategic Goals and Challenges

- Comprehensive measurement of the **carbon footprint (Scopes 1, 2, and 3)**.
- Preparation of the **Sustainability Report in accordance with GRI standards**.
- Completion of the **double materiality analysis and stakeholder engagement**.
- Improvement in the **management of solid waste and waste electrical and electronic equipment (WEEE)**.

- Consolidation of the **environmental and social volunteer program**.
- Incorporation of **ESG criteria into supplier selection and evaluation**.
- Strengthening the **budget and resources dedicated exclusively** to sustainability management.



NEXA
BPO



Fiduciaria de Occidente

Fiduciaria de Occidente is a company specializing in the **fiduciary administration of assets and estates**, dedicated to entering into commercial trust agreements and fiduciary mandates without transfer of ownership. It provides **investment, administration, guarantee, and custody** services for individuals and companies, adhering to high standards of transparency, information security, and responsible management.

Since 1991, it has established itself as a key player in Colombia's economic and social development, supporting project structuring and execution through the management of **mutual funds, private equity funds, trusts, estate planning solutions, and guarantee schemes**, thereby helping its clients achieve their financial goals.

Operational Profile and Financial Performance

- 608 employees.
- **Direct presence in 6 regions:** Barranquilla, Santa Marta, Montería, Medellín, Pereira, and Cali.
- 2 offices in **Bogotá**.
- **Total assets:** \$ 505.884 million
- **Total liabilities:** \$ 37.119 million
- **Total revenue:** \$251,347 million
- **Total expenses:** \$166,217 million
- **Net income:** \$85,129 million

*Figures in millions of COP

Strategic Focus 2025

- Consolidate our leadership in the trust sector.
- Optimize internal processes and enhance customer experience.
- Prepare for and actively participate in **the integration of Grupo Aval's trust companies into Aval Fiduciaria**, with the aim of generating operational synergies, unifying policies, and strengthening the Group's value proposition.

Key milestones and progress

- ✓ Participation in the **consolidation of Grupo Aval's trust companies**.

- ✓ Creation of a **proprietary ecosystem of digital tools**.
- ✓ Implementation of **multi-product onboarding** for corporate clients.
- ✓ Rollout of the first version of **digital onboarding for Fiduciary Businesses**.
- ✓ Comprehensive redesign and update of **digital integration workflows**.
- ✓ Enabling **digital updates to customer data**.
- ✓ Achieving **record revenue figures**.

Notable projects:

- ✓ Significant progress in **digital transformation**, including the digitization of processes for individuals and businesses and the strengthening of self-service channels.
- ✓ Implementation of **low-code solutions and MDM data synchronization**, aimed at improving operational efficiency.
- ✓ Consolidation of our **proprietary sustainability model** and publication of the **2024 Sustainability Report**.
- ✓ Strengthening the individual client segment through **new fiduciary products**.
- ✓ Initiatives to strengthen the **work environment** and the **sales force**.

Awards

- ✓ Seal of **Innovation Best Practices**.
- ✓ Top 30 **Most Innovative Companies** in Colombia (ANDI — Dinero Magazine).
- ✓ Sapphire Award — **Most Innovative Large Company** (INNpacta Awards).
- ✓ Gold Award — **Digital Transformation** (Fintech Americas).
- ✓ Gold Seal — **Car Sharing** (Bogotá Mobility Secretariat).
- ✓ Top 3 — **Environmental Leadership** (Medellín Metro).

Strategic Goals and Challenges for 2026

- Ensure 100% regulatory compliance until final integration.
- Execute an orderly, transparent, and traceable handover to Banco de Occidente.
- Complete the secure transfer of businesses, contracts, and resources, preserving the rights of customers and beneficiaries.
- Consolidate operations, businesses, and the customer base within the framework of the integration into Aval Fiduciaria, ensuring continuity, trust, and service quality.





Our market presence

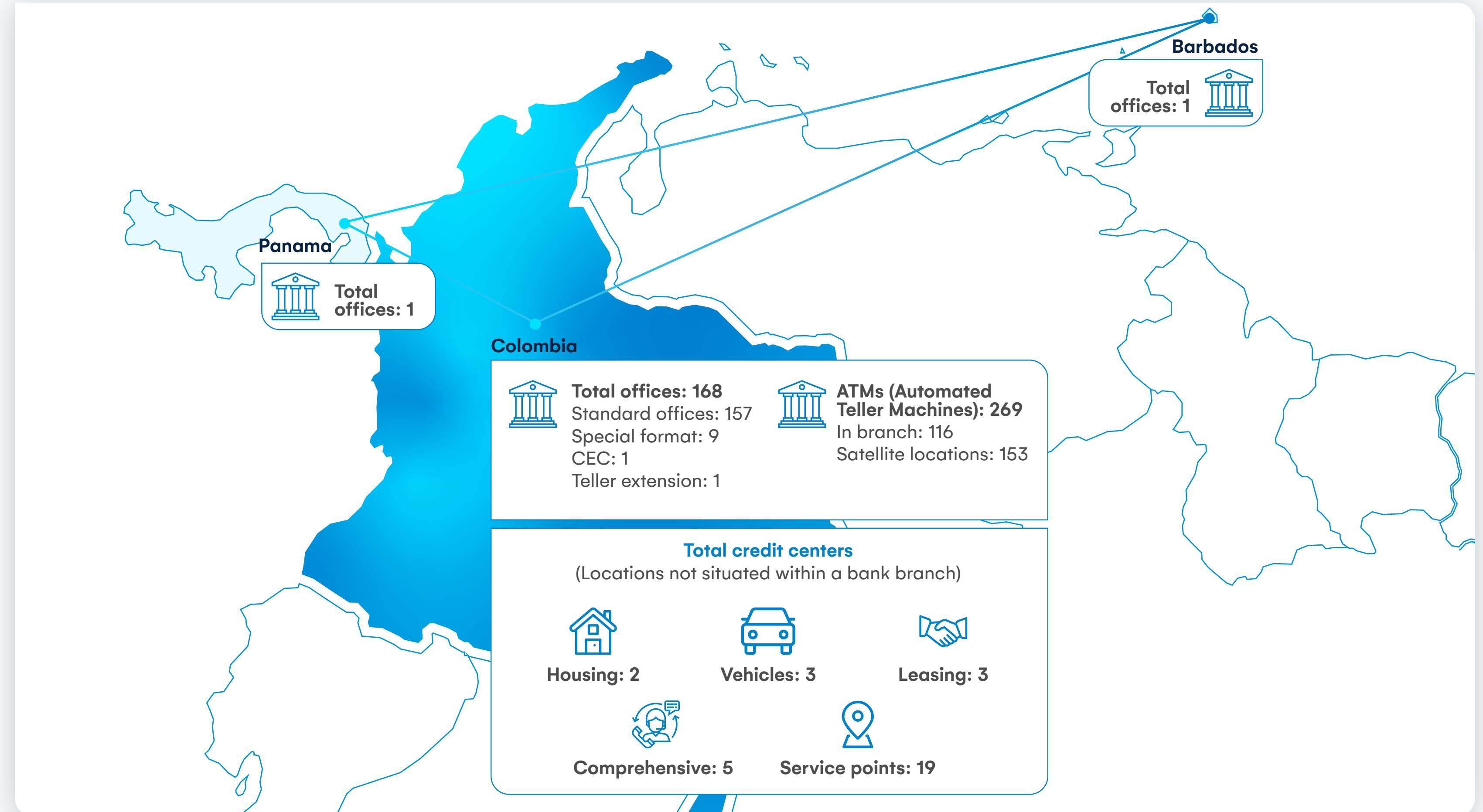
| GRI 2-6 |

National and International Presence

Banco de Occidente has a broad national presence that allows us to serve our customers and users throughout Colombia. Through **branches, ATMs, and an extensive network of banking correspondents**, we facilitate access to financial services in urban, intermediate, and rural areas. This coverage strengthens our connection with communities and helps reduce geographical barriers to accessing the financial system.

At the end of 2025, the Bank reported a net profit of **\$533.655 billion**, representing annual growth of **7.81%**. At year-end, the gross loan portfolio reached **\$51.12 trillion**, and deposits totaled **\$53.86 trillion**. In terms of assets, the Bank closed the year with a balance of **\$82.16 trillion**, reflecting annual growth of **13.1%**.

In addition to our presence in Colombia, we have a strategic international footprint that strengthens the Bank's regional reach.



In Panama, we operate an office that allows us to serve corporate clients and facilitate foreign trade operations, investments, and specialized financial services. This service enhances our connection to international markets and contributes to the strengthening of cross-border business. Meanwhile, in Barbados, we maintain an office whose objective is to support international financial operations, provide services related to corporate management, and facilitate interaction with Caribbean jurisdictions. This presence allows us to offer more comprehensive and competitive solutions to clients with regional needs.



Reputation and Recognition

Banco de Occidente's reputation is the result of consistent management, backed by financial strength, a commitment to sustainability, talent development, innovation, and the trust of our clients. In this regard, the awards, ratings, and certifications we receive are not viewed merely as outcomes, but as **management inputs that allow us to evaluate our performance, strengthen continuous improvement, and guide actions to consolidate the Bank's reputation management.**

Financial Strength

✓ BRC Standard & Poor's

In 2025, we hold a **BRC 1+** rating, which represents the highest level of payment certainty for our short-term debt on a national scale.

✓ Fitch Ratings

AAA (Colombia) rating for long-term debt, with a **Stable outlook**, and **F1+ (Colombia)** for short-term debt.

✓ Credit Consistency

For the **twenty-eighth consecutive year**, we have maintained our **AAA** rating, which reflects the highest credit quality for our long-term debt in the Colombian market.





Awards and international standing



Sustainability and climate action

- ✓ **Carbon Neutral** Recertification by ICONTEC.
- ✓ **2025 True Green Seal** — CO2CERO Seed category.
- ✓ Recognition from the Bogotá Chamber of Commerce for **exemplary sustainability practices** (89% UNICEF Credit Card).
- ✓ In our third participation in the Dow Jones Sustainability Index, **we scored 66 out of 100 points and ranked in the 89th percentile**, marking an improvement of over 47% compared to our first participation in 2023.
- ✓ S&P Global Sustainability Yearbook and 5th place in the financial sector in MERCO ESG.



Talent, culture, and commitment to communities

- ✓ **Great Place to Work: Best Place to Work in Colombia for women** and Best Bank to Work for in Latin America, for

the third consecutive year.

- ✓ Recognized as the **best bank for women to work** at in Colombia.
- ✓ **Brandon Hall Group Awards** (Gold and Silver) for excellence in talent management and learning.
- ✓ **“My Company Also Recycles”** recognition for circular economy practices and responsible post-consumer waste management.
- ✓ Implementation of the **Human Rights Due Diligence** project.
- ✓ **Promoting cultural identity and regional development** by supporting iconic fairs and festivals, as well as cultural initiatives such as *La Salsa Vive*, *Ensálsate*, and *Delirio*.



Reputation, brand, and innovation

- ✓ As part of our 60th-anniversary celebrations, we illuminated our headquarters in Cali, giving the city and the Valle del Cauca a new symbol of identity and cultural prominence.
- ✓ We ranked 3rd in the Punto Cardinal Reputation Ranking for the banking and financial sector in Colombia in the first quarter and 4th in the second quarter.

- ✓ We ranked 6th in the financial sector of the Merco Empresas ranking and 52nd in the overall Empresas ranking.
- ✓ Our president, Gerardo Silva, was recognized in the Merco Líderes ranking, reaching 114th place, close to the top 100.
- ✓ National Award for Excellence in Innovation and Management (PNEIG).
- ✓ IAB Mixx Colombia 2025 Awards: Bronze Award in the Sustainability category for the House Natour miniseries.
- ✓ Recognition from Icesi University for best practices in reputation management and sustainability, for the strategy “Voices that Build Trust.”
- ✓ Implementation of digital solutions such as Google Wallet with Mastercard on credit cards.
- ✓ Development of AZUL, our in-house generative artificial intelligence.
- ✓ More than 205,115 customers use our digital channels (Online Banking and Mobile Banking).

The reputation of Banco de Occidente is the **result of consistent management, supported by financial strength, a commitment to sustainability, and talent development.**



Key memberships and affiliations

| GRI 2-28 |

Initiative	Engagement approach	Geographic Location
UNEP-FI (Principles for Responsible Banking)	Incorporation of ESG criteria into governance, risk management, and the definition of impact objectives, with an emphasis on financial inclusion.	International
Finance for Biodiversity	Impact assessment and dependencies regarding biodiversity, and integration of this approach into decision-making and client relationships.	International
Lima Declaration	Prevention of illegal wildlife trade and associated illicit financial flows through controls and monitoring of operations.	International
PCAF (Partnership for Carbon Accounting Financials)	Measurement and disclosure of financed emissions associated with loans and investments, in accordance with international standards.	International
United Nations Global Compact	Alignment of operations with the principles of human rights, labor, environment, and anti-corruption. Integration of these principles into policies and organizational culture.	National (Colombia)
Asobancaria Green Protocol	Promotion of the integration of environmental and sustainability criteria into the management of the Colombian financial sector, encouraging the management of environmental risks and opportunities, sustainable financing, and the financial system's contribution to the country's sustainable development, in coordination with Asobancaria.	National (Colombia)
Asobancaria	Active member of the financial association, participating in technical committees and working groups to develop regulatory guidelines and best practices. This participation contributes to strengthening the sector's reputation and the Bank's role in shaping public policies for the financial system.	National (Colombia)
ANDI	Participation in the National Association of Entrepreneurs of Colombia (ANDI) through business initiatives focused on sustainability, ethics, and corporate governance, thereby strengthening the adoption of responsible practices and the Bank's reputation within the business community.	National (Colombia)
ANIF	Participation in the National Association of Financial Institutions (ANIF) through forums for economic analysis and sectoral dialogue, generating relevant inputs for strategic decision-making and consolidating our role as an active player in the Colombian financial system.	National (Colombia)
ProBarranquilla	Support for initiatives to attract investment and promote economic development in the Caribbean region, strengthening our regional presence and institutional relationships with key local stakeholders.	Regional (Caribbean)
ProPacífico	Strategic collaboration to drive progress in Valle del Cauca and the Colombian Pacific region, coordinating efforts between the private sector and territorial development to contribute to projects with social and economic impact that drive regional development.	Regional (Pacific)





Business Model

| GRI 2-6 |

Our business model is based on creating value for our customers, shareholders, and other stakeholders through financial solutions that meet the needs of a dynamic and constantly changing environment. [This model rests on two fundamental pillars: Corporate Banking and Retail Banking](#), each with distinct offerings designed to provide high-quality financial experiences and contribute to the sustainable development of businesses and society.





Corporate Banking

Our value proposition is based on personalized, specialized and timely service, integrating financial solutions designed to meet the needs of each segment and business. We help public and private organizations manage their resources efficiently and support sustainable growth, supported by technological innovation, process digitization, channel expansion, and sustainability practices that strengthen their competitiveness and adaptability in an increasingly dynamic environment.

We provide tailored services to the various participants in the business community and the public sector, adapting our value proposition to the specific needs of each segment:

- Public Sector (Government and Public Entities)
- Large and medium sized companies
- Corporate and Institutional Clients
- Entrepreneurs and Growing Companies / SMEs

Clan Transactions

We strengthened the financial operations of our business clients through the integration of multiple payment methods and channels, supporting the centralization of collections, the automation of processes, and the provision of more agile and secure payment experiences in an increasingly immediate and digital transaction environment.

Strategic Advances

- ✓ We achieved **leadership within Grupo Aval in collections and payments** via **QR codes** and the AvalPay gateway, with transactions totaling **4.053 billion** via QR and **2,7 billion** via AvalPay.
- ✓ We consolidated **self-service of digital key registration and QR code generation through OcciRed**, incorporating **35 improvements** aimed at optimizing usability and customer experience.
- ✓ We strengthened **Special Administrative Services (SAES)** as a source of new business and customer loyalty, reaching **\$14,8 billion in deposits**, with **263 clients** and **926 active services**, and consolidating our **leading position in official checking accounts**.
- ✓ We optimized the **Host-to-Host (H2H)** channel by implementing **40 user experience improvements** and **143 integrations** related to the reengineering of third-party payments, thereby enhancing the operational efficiency of our business clients.
- ✓ We expanded our **banking correspondent network** to more than **82.000 service points** nationwide through partnerships with Efecty, Puntored, SuperGiros, Punto de Pago, and Éxito, consolidating our leadership in coverage with **\$9,5 billion in transaction volume** and **39 million transactions**.
- ✓ We promoted corporate client acquisition through Dale!, reaching **169.000 new client enrollments**.
- ✓ We implemented **Evertec as a third-party acquiring processor**, strengthening the operational and technological capacity of Grupo Aval's transactional ecosystem.
- ✓ In 2025, we grew our commercial portfolio by 3,6% (+1,19 billion), with an outstanding second half of the year that contributed 1,7 billion to the result.
- ✓ We increased deposits by 10,3% (+4 billion) and improved funding efficiency by reducing the implicit savings rate (93 bps)
- ✓ We consolidated our leadership in key segments, maintaining the top position in SMEs (portfolio and deposits) and in Government (checking accounts)
- ✓ We boosted business engagement through Dale!, reaching 169,000 new connections with business clients.
- ✓ We implemented Evertec as a third-party acquisition processor, strengthening the operational and technological capacity of Grupo Aval's transactional ecosystem.





Key Milestones 2025

PAvalPay Gateway

- Integration of multiple payment methods into a single solution for business clients.
- **750 enhancements** implemented.
- **Over \$3,2 billion** collected through the gateway.
- JFK, our client with the highest number of developments.

AvalPay Center Portal

- Solution used for collecting payments for public and private services and financial obligations of Grupo Aval.
- **Over 3.000 active customers** use the portal.
- Widely used for lease payment collections.
- **Over \$3 billion** collected in payments for Banco de Occidente's financial obligations.

PSE Button

- Digital payment method integrated into company websites for online collections.
- **More than 3.000 business customers** collect payments through Banco de Occidente accounts.
- **Approximately \$46 billion** collected in 2025.

Account-to-account QR payments

- Immediate and interoperable transfer solutions for physical and digital merchants.
- **More than 11.000 active QR codes** linked to bank accounts.
- **\$426 billion** collected in 2025.
- **More than 5 million transactions** processed.



Business
Prepaid
Card

- Rechargeable payment solution for distributing funds without the need for bank accounts.
- Used for payroll, travel, petty cash, and operational payments.
- **Over 1.000 active business clients.**
- **Over \$5 billion is processed each month.**

Business
Savings
Account

- Solution for the secure management of funds, with daily returns and high liquidity.
- **28.252 active accounts** as of the end of November 2025.
- **Average balance per account:** \$27.527.618 million.
- Access to physical and digital channels, with **Fogafín deposit insurance** protection.

Business
Checking
Account

- Comprehensive solution for managing funds with immediate liquidity, security, and ease, enabling payments, collections, and transactions through multiple channels.
- **40.073 active accounts** as of the end of November 2025.
- **Average balance per account:** \$6.055.083 million.

Business
CD

- The Business CD is a safe and profitable investment alternative for companies seeking to optimize their resources over a specific term.
- **5.203 active CDs** as of the end of November 2025.
- **Average balance per account:** \$6.176.010 million. The Business CDT is a safe and profitable investment option for companies looking to optimize their resources over a specific period.

Master
Accounts

- Specialized solutions for the transparent and controlled management of public and corporate funds.
- Operations restricted to electronic transfers and pre-registered beneficiaries.
- Contributes to the efficient allocation of resources and the strengthening of controls and transaction traceability .
- Government Banking Balance (SGP and royalties): \$1.558.217 million.





Loan Division

We support companies in their financing and growth decisions through credit solutions aimed at strengthening liquidity, supporting productive investment, and addressing the needs of different economic sectors. This approach promotes business and regional development through efficient and responsible access to credit, incorporating criteria of sustainability, self-management, and specialized solutions that facilitate project execution, trade, and management of resources in local and foreign currency.

Strategic Progress

- ✓ In **Finagro — Substitute Portfolio loans**, we reached **disbursements of \$3,81 trillion**, ranking **second among Grupo Aval banks** in the use of this line. We were recognized by **Finagro as a strategic partner** for our commitment to transparency and quality in investment controls, driving the modernization of the agricultural sector.
- ✓ We made progress in **payroll digitization**, going live in June 2025 with **140 active agreements**, **5,187 savings accounts created**, and a 100% digital process, in which **80% of individuals activate their accounts independently**, without physical documents or forms.
- ✓ We strengthened the **Revolving Business Loan** by enabling online activation, increases, and decreases in credit limits, reducing processing times **from 15 minutes to 1 minute** automatically and eliminating the need for manual application submission.
- ✓ In **foreign currency solutions**, we stabilized **BankTrade** and enabled the flow of **funds through ATH**, facilitating wire transfers and strengthening operational efficiency in international transactions.



Key Milestones 2025

Standard Business Portfolio

- A credit facility designed to finance working capital and investments for companies across various sectors.
- **Portfolio balance: COP 15,7 trillion** as of December 2025.
- **6.537 corporate clients** financed.
- Notable cases: financing of projects such as P. Vinus, Coviandina, and Patrimonio Autónomo Túnel de Aburrá.

Construction Credit (Non-VIS Projects)

- Specialized financing for builders and real estate developers in non-VIS projects, under a bullet loan structure.
- Loan structuring based on the project's cash flow, with mortgage collateral and the establishment of a separate trust.
- **154 projects financed** nationwide.
- **Outstanding balance: COP 1,3 trillion** as of December 2025.
- Notable projects: Vive Río (phases I and II — Barranquilla), El Polo (Bogotá), Kiva del Río (Medellín), and Trialto (phases I, II, and III — Cali).

Revolving Business Loan

- A flexible financing line that allows companies to have an approved credit line and use it according to their liquidity needs.
- 100% digital, automatic disbursements available 24/7, with self-management through Occired.
- **504 active credit lines** with an approved amount of **COP 107 billion**.
- **Amount utilized: COP 44 billion** as of the end of 2025.
- Provides immediate liquidity and operational efficiency for businesses.
- Optimization of the online credit line activation and management process, reducing response times from 15 minutes to 1 minute.

Treasury Credit

- Short-term financing solution designed to meet immediate business liquidity needs.
- Flexible terms and repayment conditions, with competitive rates and personalized advice.
- **Portfolio balance: COP 2,7 trillion** at the end of 2025.
- Supports companies' financial stability and business continuity.

Foreign Currency Solutions

- Specialized financial services for companies operating in international markets.
- Provides foreign currency payments, financing, and guarantees for import and export transactions.
- **Average portfolio value in 2025: USD 1.582 billion.**
- Support for companies in managing international payments and capitalizing on global business opportunities.
- Stabilization of BankTrade and enabling of the flow of funds via ATH for international wire transfers.

Development Loans

- Financing lines that provide access to preferential terms through **Bancóldex, Finagro, and Findeter**.
- Targeted at companies and individuals across various economic sectors, backed by the country's rediscounting institutions.
- They facilitate access to funds under more favorable financial terms, supporting productive and sectoral development.
- Recognition of Finagro as a strategic partner for transparency and quality in the management of investment controls.
- **Total outstanding balances: COP 4,2 trillion** as of December 2025.
- **Finagro:** COP 3,4 trillion.
- **Findeter:** COP 711.159 million.
- **Bancóldex:** COP 233.924 million.

Leasing

- Financing solutions for the acquisition and use of **productive assets**, with flexible financial and operational structures.
- **Financial and operating lease** options, tailored to the needs of businesses.
- It allows for optimizing liquidity, supporting business growth, and generating tax efficiencies.
- **Loans: COP 6.3 trillion** as of November 2025.
- **5.114 corporate clients.**



Aliado Portfolio

- **Current Account and Occired Portal** package, designed for the **SME** segment.
- Digital product that replaced the analog package, improving efficiency and customer experience.
- Packages active among **3% of active SME customers**.
- **Churn reduction:** from 2 packages per activation to **0,3 packages per activation**.
- Contributes to growth in commission revenue.

Factoring

- A product for the purchase of credit instruments that provides immediate liquidity to businesses.
- It improves cash flow, optimizes financial indicators, and reduces the risk of uncollectible accounts.
- **Disbursements: COP 1,9 trillion** in 2025.
- **25% growth** in the number of customers using the product.

Unidirecto

- Solution for paying supplier invoices, with or without a discount for early payment.
- Facilitates cash flow management, improves financial indicators, and reduces administrative and tax burdens.
- **Disbursements: COP 5,47 trillion** in 2025.
- **34% growth** in loans compared to the previous year.
- Contributes to the financial strengthening of the client's supplier chain.





Personal Banking

In this segment, we support individuals and households in their financial decisions with solutions that facilitate access to products, strengthen financial inclusion, and improve digital experience. Our approach is focused on expanding coverage, strengthening funding, and responding to the needs of an increasingly dynamic environment, placing people at the center of our operation.

Our value proposition is based on providing simple, accessible, and secure financial experiences, supported by digital innovation, flexible access to credit, and the design of solutions that support life milestones such as home ownership, mobility, and consumption.

With this approach, we target individuals and households, as well as existing customers and new users who access our services through digital channels.

Strategic Progress

- ✓ Deposit growth of **22%** compared to a decline of -13% in 2024.
- ✓ Development and stabilization of new products (Kubo Rentable, accounts for the self-employed, remittances, campaigns targeting affluent Elite Plus and Elite customers, and setting the benchmark for CD rates in the market) and services
- ✓ Total disbursements grew by 10% to \$11.7 billion, **with \$1,4 billion in Housing and \$10,3 billion in Consumer lending. Housing disbursements grew by 40,4%.**
- ✓ The loan portfolio, **focused on low-risk products**, reached **\$17,2 billion**: Payroll loans \$5,41B (31%), Housing \$3,83B (22%), Free Investment \$3.34B (19%), Vehicles \$2,55B (15%), Credit Cards \$1,54B (9%), and Others \$0,52B (3%)
- ✓ Non-performing loan ratio (**NPL**) for consumer loans of 3,88% as of November 2025, **below the sector average of 4,91%.**
- ✓ We made progress in **payroll integration** through the **Nómina Sinergia BE** program, reaching **140 agreements** and an increase in accumulated deposits of **\$12.083 billion.**
- ✓ We strengthened the **management of commercial campaigns**, with disbursements of **\$1,33 trillion** (+15%), and implemented a profitable campaign framework that **accounted for 4% of the year's disbursements.**
- ✓ We boosted digital marketing, with loan disbursements of **\$818 billion**, representing **95%** growth, and structured the **independent segment** as a strategic focus.
- ✓ We increased business through **participation in large-scale trade shows**, achieving **\$107.675 billion** in results, a **35%** increase over the previous year.
- ✓ We generated demand for business centers through campaigns and contests focused on deposits, notably **contests totaling \$155.437 billion and OcciFest totaling \$46.859 billion.**
- ✓ We consolidated the use of **digital payment keys**, reaching **320.000 active keys, 2,9 million transactions**, and a volume of **\$526 billion.**
- ✓ We strengthened **self-service** channels **via WhatsApp**, increasing **participation by 12%**, which generated efficiencies for the Contact Center and product sales of over **\$40 billion.**
- ✓ We launched campaigns to **promote credit card usage**, reaching our revenue target and achieving **14,8%** growth.





Financial solutions for life goals

Mortgage loans

We promote access to housing through financing options tailored to our customers' needs, incorporating improvements in coverage, flexibility, and digital experience.

Key achievements:

- ✓ Expanding customer coverage through **joint applications**.
- ✓ Credit approvals in UVR, offering greater financial flexibility.
- ✓ Development of a **new self-service workflow** for external partners.
- ✓ Implementation of a **mortgage calculator via WhatsApp**, which facilitates planning and access to information.

Auto Loans

We strengthened our vehicle financing solutions, expanding access to credit and optimizing onboarding and documentation and approval processes, with a focus on agility and customer experience.



Principales avances:

- ✓ Inclusion of **independent customers** in the financing offering.
- ✓ Credit facilities for **Chinese and Indian brands**, expanding market options.
- ✓ Optimization of onboarding and documentation and approval processes through digitization and operational efficiency methodologies.
- ✓ Implementation of a **vehicle simulator via WhatsApp**, which simplifies the customer experience.



Digital Innovation

We promote digital innovation as a key enabler to improve our customers' experience and facilitate access to more agile, secure, and convenient payment solutions. Through the development of digital products and integration with new platforms, we enhance the immediacy, simplicity, and usability of our financial services.

Key achievements

- ✓ Launch of the **100% Digital Occiflex Credit Card**, available for immediate use via mobile banking.
- ✓ Integration of **Mastercard credit cards into Google Wallet**, enabling payments without a physical card from Android devices with NFC technology.
- ✓ Enhancing the digital experience through solutions that eliminate friction and expand payment options for our customers.



Inclusion, Sustainability, and Customer Experience

We integrate inclusion, sustainability, and customer experience as central elements in the design of our solutions for people. Through initiatives that combine innovation, accessibility, and social impact, we seek to eliminate barriers, generate shared value, and strengthen our relationship with our customers and communities.

Key initiatives and progress:

- ✓ Implementation of **Touch Card** on our credit and debit cards, which allows people with visual impairments to easily identify them by touch, improving accessibility and user experience.
- ✓ We developed the “**Shopping with a Purpose**” campaign, through which we will contribute to **Terrasos** the equivalent of **1% of the average daily sales** from purchases made with credit cards. This contribution will be used to acquire **biodiversity units**, helping to conserve **more than 490 species of flora and fauna at the El Globo Habitat Bank**, located in Antioquia.
- ✓ The development and consolidation of the **UNICEF Credit Card** have enabled us to channel resources to support initiatives for access to **drinking water, sanitation, and hygiene practices** in communities in **La Guajira**. In 2025, the Bank had **14.524 active cards**, all of which were manufactured using **85% recycled PVC**, and through this product, more than **\$2.134 billion** has been allocated over the past four years, under the agreement with our strategic partner.
- ✓ Won **Gold at the Fintech Americas Financial Innovators Awards of the Americas** in the Customer Experience category for solutions that strengthen the inclusion and usability of our products.

Responsible growth: and comprehensive risk management





Financial overview and stock market performance



SDG 8.1; 8.3

To understand the figures included in this document, the following conventions are used:

One billion pesos = \$1,00B.

One billion pesos = \$1.000MM.

One million pesos = \$1MM.

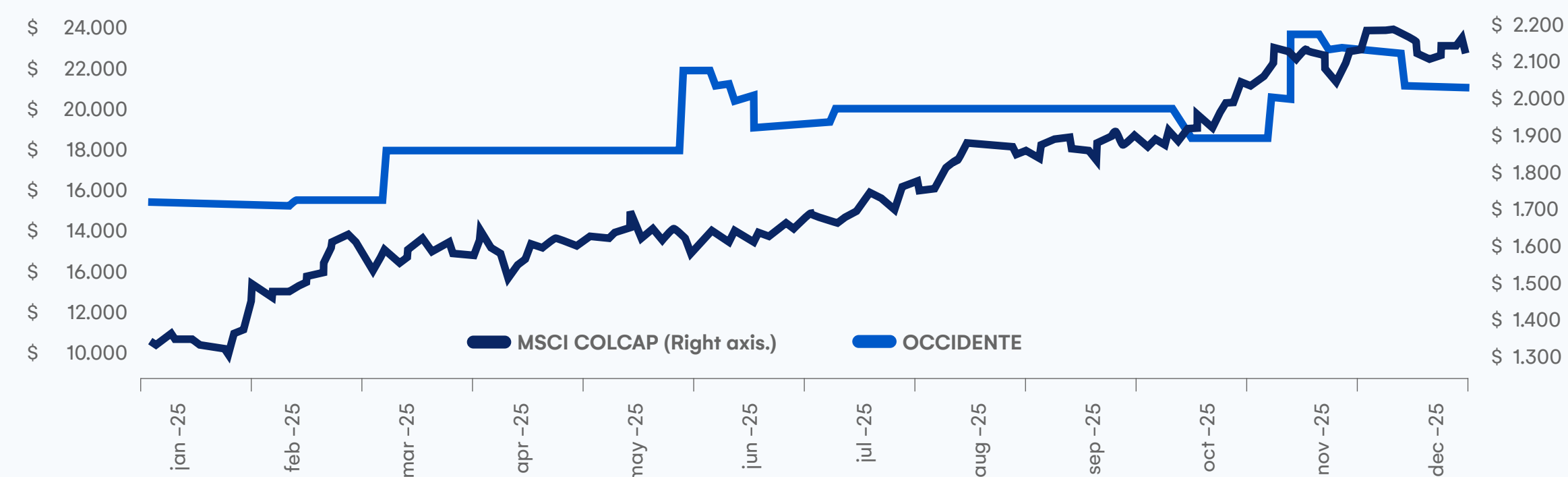
One million dollars = USD 1MM.

Our Performance in the Stock Market

Banco de Occidente Stock

Banco de Occidente's stock is traded on the Colombian Stock Exchange and closed 2025 at a price of \$21.500, representing a 26,5% increase compared to the close of 2024. Banco de Occidente shares traded during 2025 within a price range of \$17.000 to \$23.400 per share, with a weighted average price of \$20.115. Volatility, measured as the difference between the highest and lowest traded prices, was \$6.400. Total trading volume was \$968,1 million, with 48.405 shares traded.

COLCAP and Trade BdeO





Banco de Occidente Bonds

Regarding our **local fixed-income securities**, we **did not issue any new bonds** in 2025. In the secondary market, **325 transactions** were executed, with a **trading volume of \$413.228 billion**, distributed across **18 bond issuances** of ordinary and subordinated bonds issued by Banco de Occidente locally.

The rates observed in the secondary market ranged from a **minimum of 9,0% to a maximum of 12,66%**. The Bank's bonds accounted for **0,17%** of the **total** secondary market (excluding TES trading).

Below, we describe the beneficiary whose percentage is equal to or greater than 10% of the share capital:

Identification	Investor Name	Number of Shares	Ownership Interest	Share Class
8002161815	Grupo Aval acciones y valores S.A	112.671.465	72,2717563%	Common

We are part of **Grupo Aval Acciones y Valores S.A.**, as one of its subsidiaries, with a **72,27%** stake in our share capital. This affiliation makes us part of the business group controlled by the individual **Luis Carlos Sarmiento Angulo**.

Finally, at the **Shareholders' Meeting held on March 26, 2025**, a cash dividend of **\$133 per share per month** was approved, payable within the first ten days of each month in accordance with current legislation, from **April 2025** through **March 2026**, inclusive, on a total of **155.899.719 shares** subscribed and paid in full as of **December 31, 2024**.

Our Shareholding Structure and Compositiona

All of our issued shares are **common shares**. In total, **1.351 shareholders** make up the share capital as of December 31, 2025, as follows:

Class of outstanding shares	Number of shareholders	Share of total capital
COMMON	1.351	100%





Macroeconomic Outlook

| GRI 203-2 |

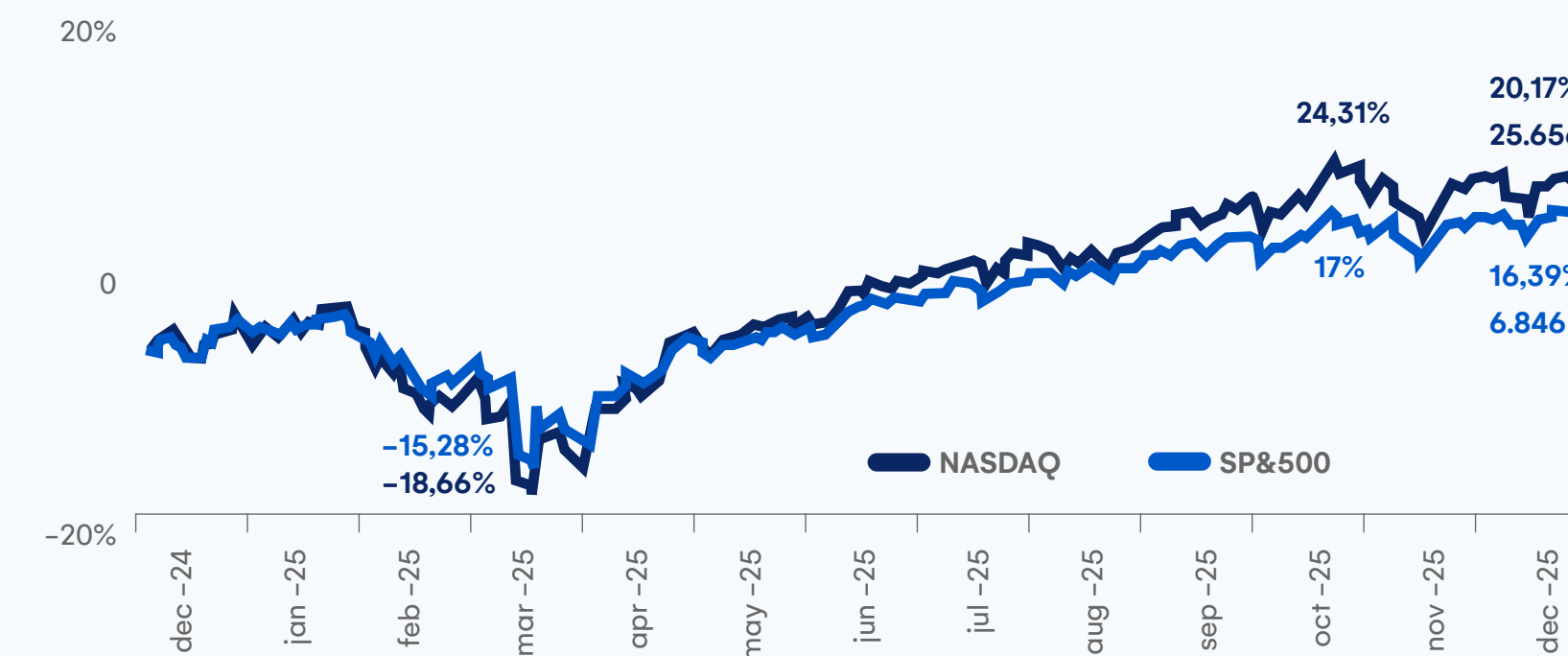
International Context

In 2025, we saw a global economy undergoing a process of disinflation that progressed at different rates across regions and without clear convergence toward central banks' targets. In developed economies, inflation continued to moderate, creating room for some normalization of monetary policy. Even so, pressures in the services sector and inflationary risks kept authorities on a cautious footing, preventing rapid rate cuts.

In financial markets, the year's movements were primarily influenced by **political, geopolitical, and trade factors**. While there were episodes of correction in equity markets, these were temporary and did not imply a significant deterioration in economic fundamentals.

The most notable development was the resurgence of global trade tensions, driven by the tightening of U.S. tariff policy under the Donald Trump administration. These measures targeted strategic sectors such as **manufacturing, technology, automobiles, and intermediate goods**, reintroducing the risk of fragmentation in international trade. Consequently, investors began demanding a higher risk premium linked to trade and economic policy.

Chart 1. Performance of Selected Stock Indices
(change from 2024 close)



Source: LSG, own calculations.

In this context, equity markets experienced a first half of the year marked by episodes of high volatility, driven by the uncertainty caused by trade tensions. However, in the second half of 2025, that volatility subsided as investors came to terms with the fact that tariff announcements would be gradual, subject to debate, or of limited scope (Figure 1).

At the same time, artificial intelligence established itself as a structural driver of growth and valuation in the global market. The rapid adoption of AI-based solutions enabled productivity gains, cost reductions, and the development of new business models, with a notable impact on sectors such as technology, financial services, manufacturing, and logistics. This phenomenon was reflected in the performance of leading companies like Nvidia, whose market value rose **38%** between late 2024 and the end of 2025.

Against this backdrop, risk appetite stabilized, and equities ended the year on a positive note, driven by technology companies. As a result, **Nasdaq** rose **20,2%** in 2025, followed by **S&P 500 (+16,4%)**.

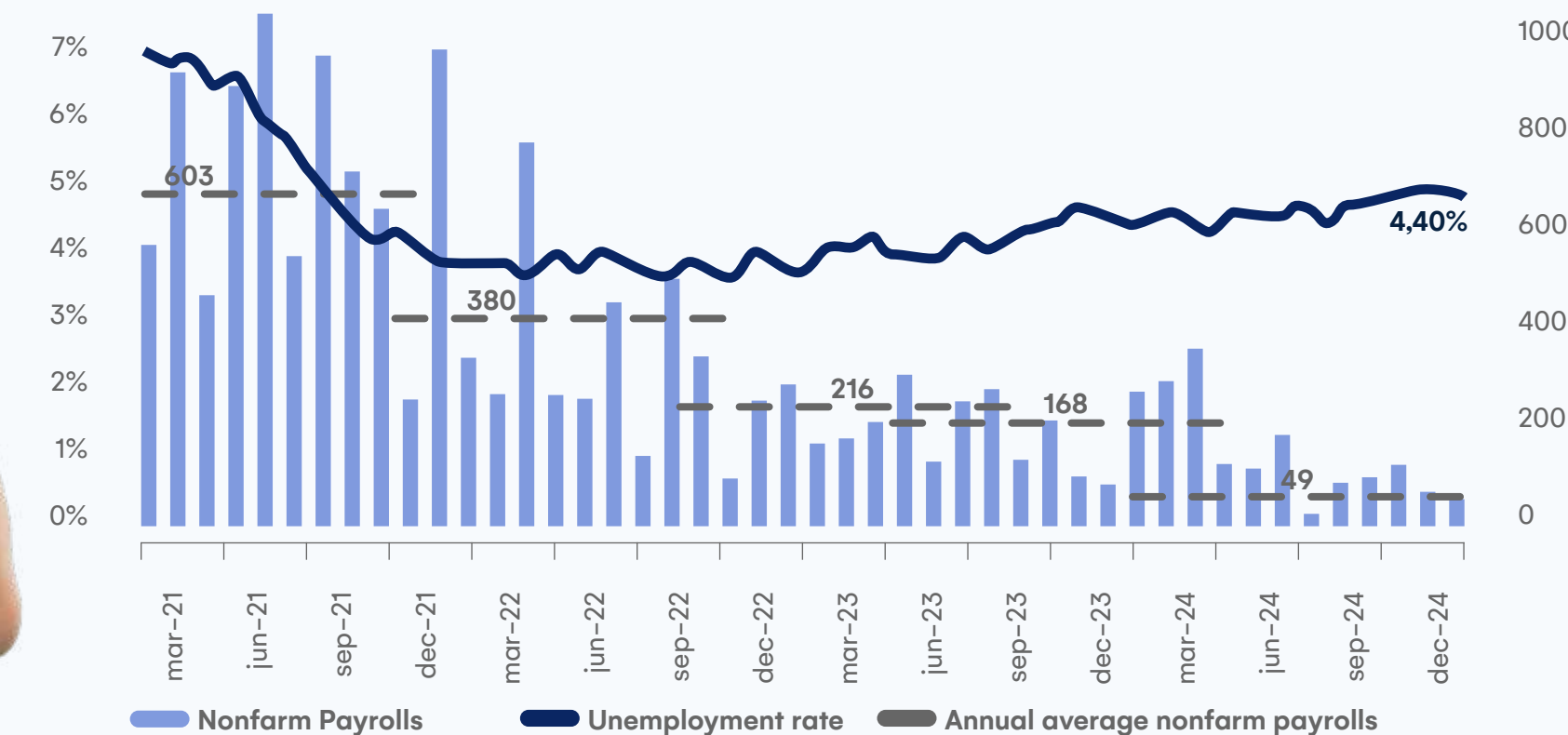




United States: Labor Market and Protectionist Policies

In 2025, the U.S. labor market showed signs of cooling. Unemployment rate rose, closing the year at **4,40%**, compared to **4,00%** at the end of 2024. In line with this, job creation also moderated: **584.000 jobs** were created during the year, down from the **2 million** created in 2024 (Figure 2).

Figure 2. Nonfarm payroll growth and unemployment rate (United States)

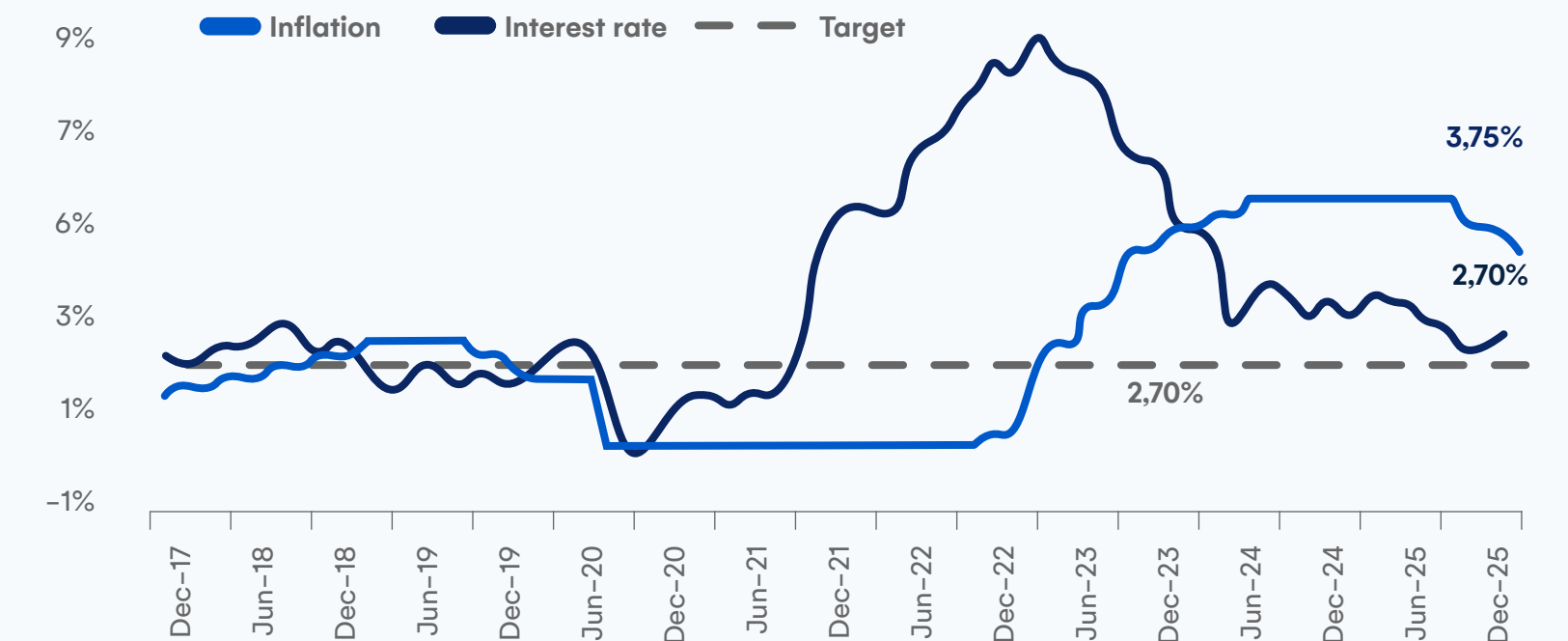


Source: LSEG, own calculations.

Meanwhile, inflation ended in 2025 at **2,7%**, down from the **2,9%** recorded at the end of 2024. Although it still stood above the FED's target (**2,0%**), the result was lower than expected, especially considering the potential effects of the tariff policies promoted by the Donald Trump administration.

In this context, and with a strong focus on labor market performance, the Federal Reserve began a cycle of monetary policy rate cuts in September. **Two additional cuts** were made throughout the year, bringing the rate to **3,75% from 4,50%** at the end of 2024 (Figure 3).

Chart 3. Annual Inflation and Interest Rate (United States)



Source: LSEG, own calculations.

Europe and China: Uncertain Growth Outlook

In 2025, the European economy maintained weak growth, close to **1%**, affected by low domestic demand, fiscal constraints, and a fragmented political environment that particularly impacted the region's major economies. Eurozone inflation tempered from **2,4%** in December 2024 to **2,0%** in December 2025, reaching the European Central Bank's target. Against this backdrop, the monetary authority cut rates **four times** (by 25 basis points each) during the first half of the year and then kept them unchanged at **2,0%** in the second half, adopting a cautious stance in light of fiscal and political risks in countries such as Germany and France.

China continued to grow below its potential and failed to reach the **5%** target. The prolonged real estate crisis and the lack of confidence among households and businesses limited the effectiveness of stimulus measures, in a scenario further marked by the trade war with the United States. In May 2025, the People's Bank of China cut its benchmark rates by 10 basis points, bringing the **one-year LPR** (China's preferential lending rate) to **3,0%** and the five-year **LPR to 3,5%**. Subsequently, it kept rates unchanged, awaiting further cuts that could boost economic activity amid global uncertainty.



Commodities: Mixed Performance

2025 was a year of mixed results for commodities, reflecting a combination of macroeconomic, geopolitical, and supply-side factors. Among the most notable gains were **coffee (53,6%), natural gas (50,1%), gold (44,2%), and silver (42,0%)**. In contrast, the worst performers were soybeans **(-5,7%)**, wheat **(-6,9%)**, and coal **(-10,9%)** (Table 1).

Table 1. Commodity Prices

Materia Prima	Uds.	Precio cierre		Variación anual (%)
		2023	2024	
Coffee	\$US¢/lb	232,6	357,4	53,6%
Natural Gas	\$US/MMBtu	2,4	3,6	50,1%
Gold	\$US/t oz	2.389	3.445	44,2%
Silver	\$US/t oz	28,3	40,2	42,0%
Soybeans	\$US¢/bu	1.103	1.039	-5,7%
Wheat	\$US¢/bu	572,6	533,1	-6,9%
Coal	\$US/ton	112,9	100,5	-10,9%
Brent Oil	\$US/bbl	79,9	68,2	-14,6%

Source: LSEG, own calculations.

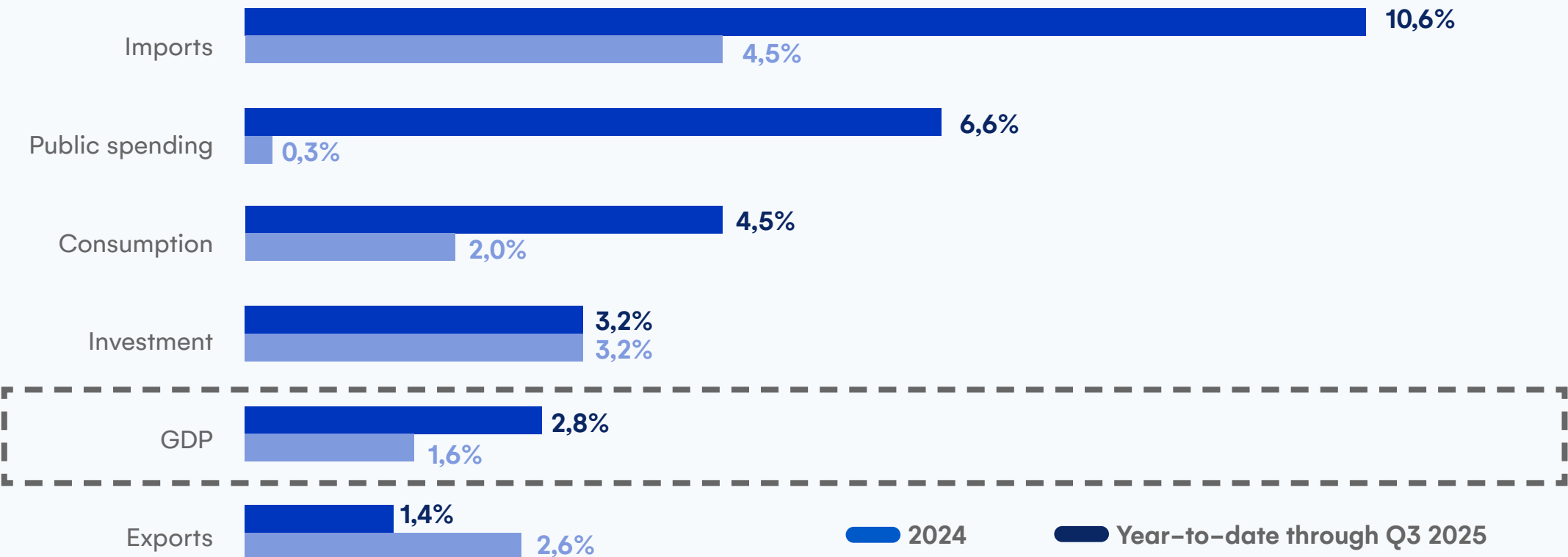
As for oil, Brent averaged **US\$68,2 per barrel, a 14,6% decline compared to 2024 (average: US\$79,9 per barrel)**. This performance was influenced by the imbalance between moderate global demand, OPEC+’s bullish production policy, and the absence of prolonged supply disruptions, despite a geopolitical context that remained complex.

Local Context

In 2025, the country presented a mixed picture. The disinflation that had begun in 2023 lost momentum, and inflation remained above target, with some spikes that led the Central Bank to maintain a prudent stance and a rate virtually unchanged from 2024. Even so, the economy recorded solid growth, supported by strong household consumption and firm domestic demand.

In 2024, the Colombian economy had shown a recovery with growth of **1,6%**, higher than the **0,7%** observed in 2023. During the third quarter of 2025, we observed that **Gross Domestic Product (GDP)** accelerated to **2,8%**, driven primarily by the strong increase in government spending **(6,6%)** and investment **(3,2%)**. However, the external sector dampened growth, as imports grew faster **(10,6%)** than exports **(1,4%)**. Although investment began to show signs of recovery, it has not yet reached pre-pandemic levels. Overall, growth continued to depend largely on domestic consumption and public spending.

Figure 4. GDP by Demand (Colombia)



Source: LSEG, own elaboration.

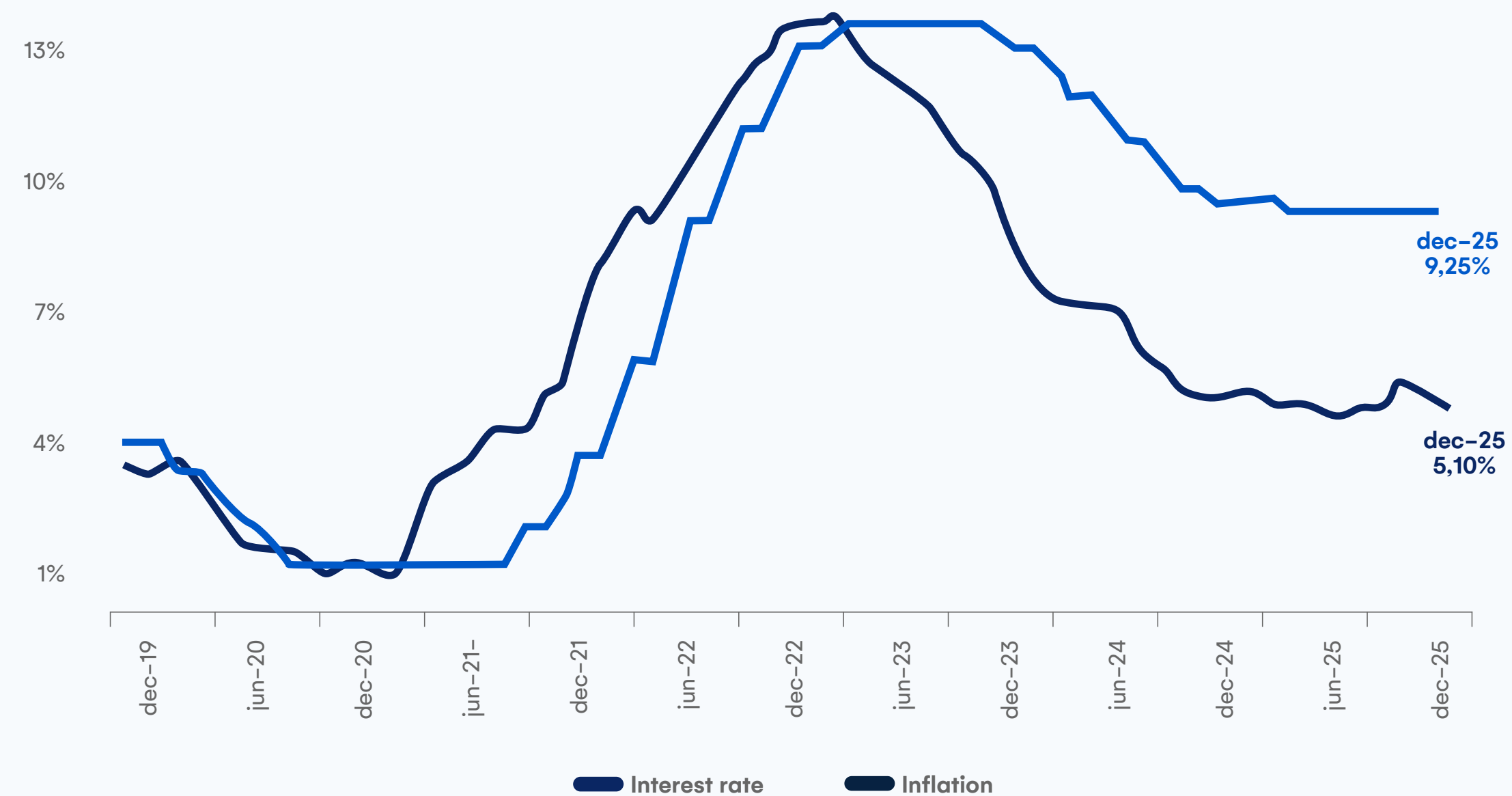
By sector, **public administration, entertainment, and commerce** stood out in 2025. In contrast, **mining and construction** remained in contraction, affected by still-high interest rates and relatively low international crude oil prices. We project growth of **2,7%** for 2025 and **3,2%** for 2026.

In terms of prices, between 2024 and 2025, inflation slowed by a mere **10 basis points**, closing at **5,10%**. This persistent inflation was linked to pressures on rents, services such as transportation and restaurants, and food. In this context, the Central Bank maintained a cautious stance and made a single cut of **25 basis points** to its policy rate, which ended in 2025 at **9,25%**. This cautiousness was also a response to fiscal deterioration and the decoupling of inflation expectations.

Looking ahead to 2026, the **23,7%** increase in the minimum wage will be a key factor, as it could lead to higher labor costs, price adjustments for goods and services, and greater indexation in sectors such as housing, health, and education, in addition to an increase in fiscal spending of around **0,30% of GDP**. Given these factors, we project that inflation will close at around **6,0%**, which we expect will lead the Central Bank to raise the interest rate to **11,00%** by mid-year. Subsequently, we expect the rate to remain at **11,00%** through mid-2027.



Chart 5. Inflation and Central Bank Interest Rate



Source: DANE, BanRep, own calculations.

In 2025, Colombia's exchange rate showed a marked downward trend. It started the year at **\$4.409** and closed at **\$3.757**, representing an appreciation of nearly **14,8%** and cementing its status as one of the strongest currencies globally. Throughout the year, the TRM fluctuated within a range of **\$4.480 to \$3.685**.

This performance was driven by a combination of factors: the easing of international financial

conditions, the peso's appeal due to high local interest rates, and increased appetite for emerging markets. Added to this was the weakening of the dollar, which depreciated by nearly **10,0%**, and the government's debt management operations, which generated a significant inflow of dollars into the country. Together, these factors created a favorable environment for the appreciation of the Colombian peso.





Chart 6. Performance of the Colombian peso against the dollar.



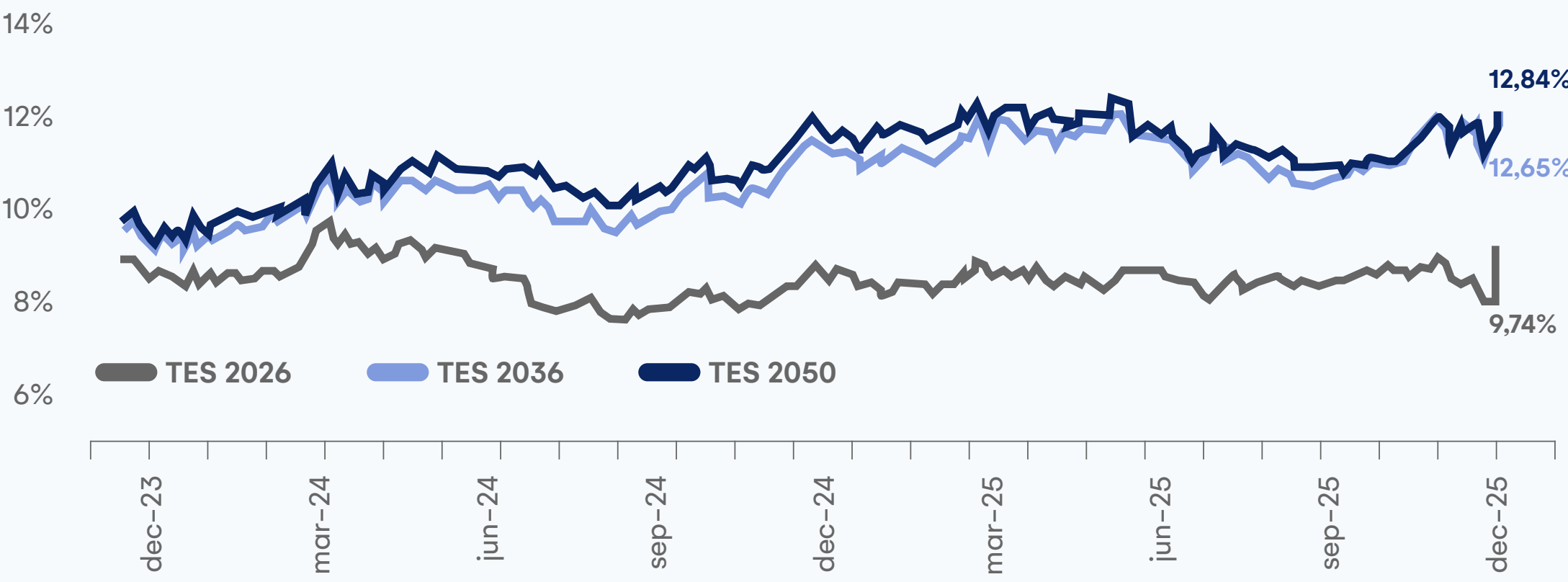
Source: BanRep, own elaboration.

At the same time, public debt deteriorated significantly in 2025, as reflected in the fixed-rate TES curve, which recorded an average decline of **103 basis points**, with greater pressure on the short- and medium-term segments. In particular, the **2028 TES** benchmarks rose by **203 basis points**, while the **2030 TES** showed the highest variation, with an increase of **212 basis points**.

These developments were closely linked to the deterioration of public finances, exacerbated by the Ministry of Finance’s suspension of the fiscal rule. However, the debt management strategies implemented in the second half of the year by Crédito Público succeeded in partially containing the depreciation by improving the government’s liquidity and facilitating the meeting of its financing needs.



Chart 7. Behavior of the TES TF Yield Curve



Source: LSEG, own elaboration



We generate profitable and sustainable growth



SDG 8.3; 9.3

In 2025, we maintained our focus on driving economic growth that is both **profitable and sustainable**. We do this by creating value for our shareholders and customers, promoting the well-being of our employees and their families, and contributing to the country's economic progress.

The **Vice Presidency of Finance and Strategy** assumes a central responsibility: **to protect the Bank's assets and equity**, as well as our **customers' deposits**. Building on this foundation, we contribute to growth through rigorous **financial and tax planning**, aimed at generating value and distributing it in a socially responsible manner, in line with our commitments to our stakeholders.





Economic value generated and distributed

| GRI 201-1 |

To demonstrate how the Bank creates and distributes value throughout its operations, we present below the evolution of economic value generated and distributed during the 2022—2025 period:

Item	2025	2024	2023	2022
Direct economic value generated: revenue	\$ 3.837,81	\$ 3.573,41	\$ 3.187,36	\$ 2.702,92
Net interest margin	\$ 2.157,64	\$ 2.095,43	\$ 1.991,03	\$ 2.019,26
Other ordinary income	\$ 1.501,18	\$ 1.322,35	\$ 1.015,75	\$ 494,46
Net commissions	\$ 178,99	\$ 155,63	\$ 174,17	\$ 188,54
Release of withheld earnings	–	–	\$ 6,40	\$ 0,66
Direct economic value distributed	\$ 2.314,18	\$ 2.129,11	\$ 1.849,64	\$ 1.856,05
Suppliers	\$ 812,58	\$ 713,37	\$ 608,94	\$ 518,23
Shareholders	\$ 266,77*	\$ 248,92	\$ 215,14	\$ 251,00
Direct employees	\$ 574,04	\$ 522,57	\$ 491,58	\$ 434,63
Taxes and contributions	\$ 442,81	\$ 455,49	\$ 363,40	\$ 487,78
Investments to improve customer service	\$ 212,80	\$ 184,72	\$ 163,01	\$ 138,42
Donations and Advance on Conditional Donation from the Fundacion CTIC *	\$ 5,12**	\$ 4,04	\$ 7,57	\$ 26,00
Provisions, Depreciation, and Amortization	\$ 1.256,81	\$ 1.198,23	\$ 1.115,85	\$ 594,57
Reservations	\$ 266,89***	\$ 246,18	\$ 221,87	\$ 253,00
Withheld economic value	\$ 1.523,70	\$ 1.444,40	\$ 1.337,72	\$ 847,57

Note* Preliminary data

Note** For the year 2023. Includes a donation advance of \$4.114.

Note*** Preliminary data

(Figures in billions of pesos MMM).



Bank Performance and Key Changes

Standalone Financial Statements

In 2025, we recorded **13,1%** annual growth in total assets. These increased by **\$9,51B** compared to December 2024 and reached a total balance of **\$82,16B**.

The loan portfolio is the Bank's primary asset, representing 61,3% of total assets as of December 2025. The total gross portfolio closed December 2025 at \$51,12B, up 4,3% from December 2024, with a market share as of Dec-25 of 7,0%. By portfolio type: the commercial portfolio closed at \$34,34 billion, representing a year-over-year growth of 3,6% and a market share of 9,0% as of Dec-25. The consumer portfolio reached a balance of \$12,95 billion, an annual increase of 1,0%, and a market share of 6,4% as of December 2025. Finally, the housing portfolio recorded a balance of \$3,83 billion, a 26,4% increase, and a market share of 3,1% as of December 2025.

The **credit portfolio** classified as C, D, and E recorded a **total balance of \$3,02 trillion**, representing 5,92% of the total gross credit portfolio in local and foreign currency and an annual variation of -4,7%.



In the Commercial portfolio, there was a 5,7% decrease in balances corresponding to categories C, D, and E when comparing the variation between 2024 and 2025. This reduction is explained by payments or loan normalization in 78,4% of cases, with the remainder attributed to write-offs.

In the Consumer portfolio, there was a 14,5% decrease in the balances corresponding to categories C, D, and E year-over-year between 2024 and 2025. This reduction is mainly explained by the decline in Credit Cards (-32,4%), which represents the most significant adjustment within the portfolio. Added to this trend are the decreases observed in Free Investment (-13,6%) and Vehicles (-11,7%), products that also contribute significantly to the deterioration in CDE categories.

Finally, in the Housing portfolio, there was a 2,3% decrease in the balances corresponding to categories C, D, and E when comparing the change between 2024 and 2025.

In line with portfolio management, total **Financial Investment Assets and Trading Derivatives reached \$20,83 billion**, representing a **29,3%** increase compared to the previous year. This performance was driven by investments in debt securities, which showed annual growth of **42,3%**, with a change of **\$3,51 billion**.

In terms of liability, we closed 2025 with a total balance of **\$76,45 billion**, recording an additional **\$9,28 billion** compared to the previous year-end, equivalent to an annual increase of **13,8%**.

According to the latest information available from the Colombian Financial Superintendency, as of December 2025, Banco de Occidente held a **7,2% market share** of total deposits, broken down as follows: 8,8% in checking accounts, 8,7% in savings accounts, and 5,2% in time deposits.

Within this trend, the performance of **total deposits** stood out, reaching **\$53,86 billion** as of December 31, 2025, an increase of **\$5,68 billion** compared to December 2024, representing annual growth of **11,8%**.

This result was primarily driven by the growth in savings accounts, which recorded a balance of **\$30,72 billion**, an increase of **\$2,86 billion** compared to the previous year, equivalent to **10,3%**.

In terms of deposit composition, **savings accounts, checking accounts, and CDs** accounted for **57,8%, 14,0%, and 28,1%** of the total, respectively. This growth in savings products is primarily due to **our funding strategy**, which is focused on meeting liquidity indicators (particularly CFEN) and optimizing the cost of funds.

Regarding other funding sources, it is worth noting the growth in Interbank Funds and Overnight Funds, where the year-end balance reached \$12,28 billion, representing a year-over-year increase of 42,2%.

1) La participación de mercado del Banco de Occidente se mide sobre el total del Sistema Bancario a corte diciembre 2025 que es la última información disponible en Superintendencia Financiera de Colombia (SFC) a la fecha de construcción de este informe.



On the other hand, the performance of bonds reflects maturities of issuances during the year; as of December 31, 2025, the balance of bonds issued by the Bank was \$2,10 billion, reflecting an annual decrease of -21,4%. Currently, the outstanding bond balance has an average maturity of approximately 3 years.

Our Bank's total equity stood at \$5,71 billion, an increase of \$0,23 billion compared to the previous year, representing 4,1% growth. This result is explained by the \$0,24 billion increase in the equity reserve due to retained earnings from the 2024 period, the results for the 2025 fiscal year, and the reduction in unrealized gains or losses on the available-for-sale fixed-income portfolio.

Our total net income at the end of December 2025 was \$533.655 million, representing a 7,8% change compared to the result of the immediately preceding year, explained primarily by the following events:

- Annual growth of 3,0% in net income and valuation results, equivalent to \$62.212 million.
- Annual growth of 36,9% in net income from financial assets or liabilities held for trading, equivalent to \$238.518 million. This contrasts with an 8,8% decrease in other operating income, particularly regarding foreign exchange differences.
- Increase in net impairment losses on financial assets of \$44.619 billion, growing by approximately 3,8%, primarily represented by the consumer loan portfolio, especially in products associated with unrestricted use.
- The Bank's general administrative expenses increased by 11,6% to \$121.115 billion, driven by inflation-indexed expense items and taxes.



Chart 8. ROAE

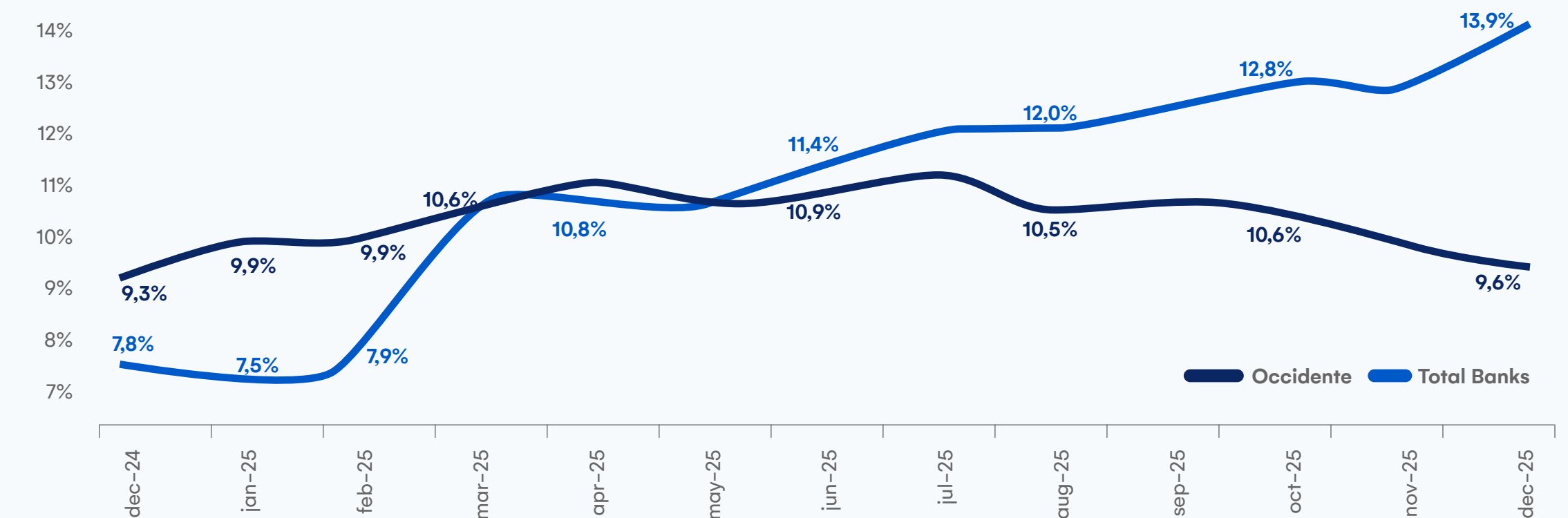
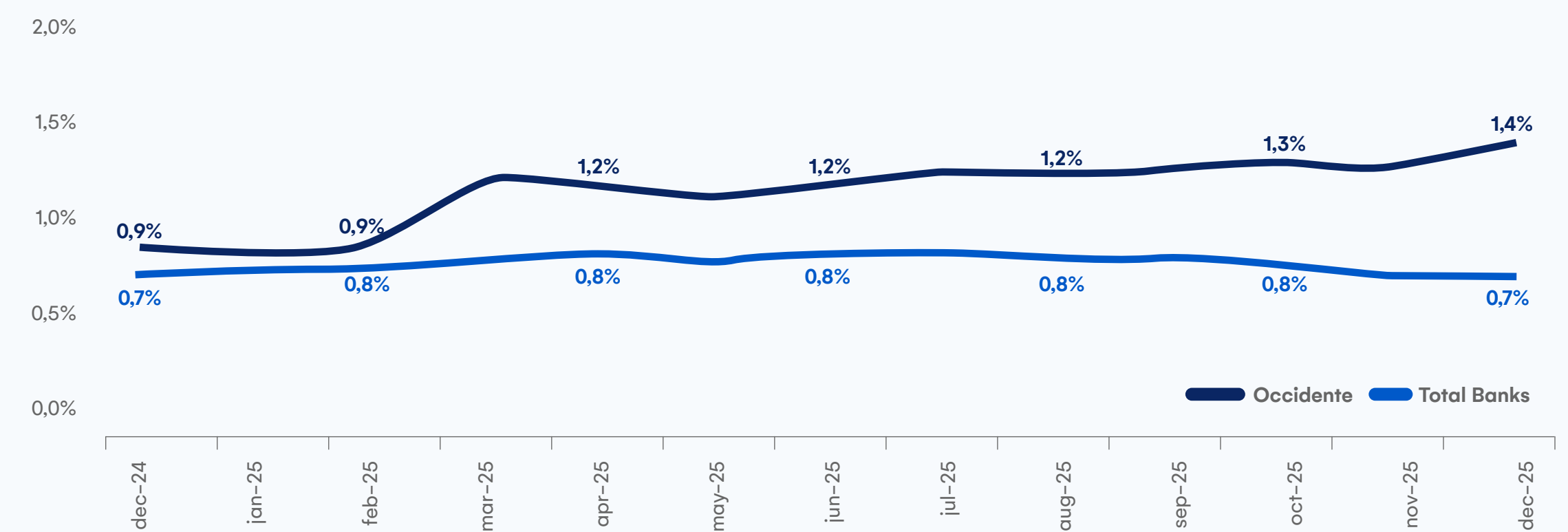


Chart 9. ROAA



As a result, we were able to maintain our profitability indicators within the Bank's expectations. In December 2025, the **Annual Return on Total Assets** was **0,7%**, while the **Annual Return on Equity** stood at **9,6%**.



Consolidated Financial Statements

On a consolidated basis, **total assets** reached **\$88,16 billion** at the end of 2025, an increase of \$9,76 billion compared to the end of 2024. This increase was primarily driven by growth in investments in debt securities, associated with strategies implemented to support the increase in loans, both at the parent company and at the subsidiaries.

As for **total liabilities**, they stood at **\$81,90 billion** at the end of 2025, representing a **13,1%** increase compared to the end of 2024, in response to the funding needs of our commercial operations. Meanwhile, **total consolidated equity** closed at **\$6,26 billion**, an increase of **\$272.811 million** compared to the end of 2024.

Consolidated net income attributable to controlling interests was **\$574.816 billion**, representing a **21,4%** increase compared to 2024. This increase

was primarily driven by growth in net income from financial assets or liabilities held for trading, which reached **\$890.049 million**, a **36,4%** increase compared to the previous year, mainly due to net gains on marketable investments, which showed annual growth of **\$463.459 million**. Added to this was the **11,6%** change in net interest income after impairment, equivalent to **\$113.072 million**, broken down primarily into interbank lending activities.

Finally, the “**other net expenses**” category rose by **12,9%**, amounting to **\$296.371 million**. A breakdown of this figure reveals increases in **personnel expenses (9,3%)**, **general and administrative expenses (14,2%)**, and **depreciation and administrative expenses (15,7%)**.

Annual Return on Assets was 0,7% of total assets and 9,5% of equity.

Solvency Performance

In 2025, we continued to analyze and implement actions aimed at strengthening **proactive capital** management, ensuring an adequate level to meet both regulatory indicators and our **internal risk appetite**. This work was carried out in a context of increased capital requirements, stemming from the Bank’s designation as a **Systemically Important Institution (SII)**, as declared by the Colombian Financial Superintendency (SFC) through **Circular Letter 074 of 2024 and Resolution 2629 of 2024**. This designation entailed a 60-basis-point increase in the capital requirement during 2025, under a transition framework to implement the systemic buffer, distributed across four phases:

Phase 1: 30% of the buffer by **Jun 30, 2025**.

Phase 2: An additional 30% by **Nov. 15, 2025**.

Phase 3: An additional 20% by **May 31, 2026**.

Phase 4: An additional 20% by **Nov. 15, 2026**.

At the end of 2025, on an individual basis, we recorded a **total solvency ratio of 12,50%**, representing a decrease of **20 basis points** compared to the end of 2024. This decrease was primarily due to two factors:

- i. The reduction in the value of equity instruments included in the additional capital, resulting from the appreciation of the exchange rate and the lower weighting of subordinated bonds issued in local currency nearing maturity.
- ii. The devaluation of the fixed-income portfolio recorded in **Other Comprehensive Income (OCI)**, stemming from macroeconomic conditions that affected security prices, which reduced the value of technical reserves.

At the consolidated level, the **total solvency ratio increased by 5 basis points compared to the previous year, standing at 12,90%**. This result was driven primarily by the year’s profits and by the reduction in capital consumption driven by market risk.

As relevant information, it is important to note that in **November 2025, the SFC reaffirmed the Bank as a Systemically Important Institution (SII) for 2026, via Circular Letter 068**. This reaffirmation implies the continued application of additional capital requirements, in accordance with the current regulatory framework and transition plan.



Subsidiaries and Principal Affiliates

In 2025, our subsidiaries maintained a focus on financial soundness and business continuity, with results reflecting portfolio adjustments and strategic investment moves, in a context influenced by the behavior of international interest rates.

Banco de Occidente (Panamá) S.A.

Overall, the operations of our subsidiary in Panama achieved the following milestones:

- **Portfolio:** recorded a significant change, falling from **USD 546 million in 2024 to USD 523 million in 2025**, representing a **4%** decrease in balances.
- **Investments:** There was a **24%** increase, rising from **USD 281 million to USD 363 million**, associated with the purchase of securities in response to market conditions.
- **Liquidity:** increased by **93%**, rising from **USD 173 million to USD 335 million**, primarily due to the decrease in the loan portfolio and the increase in time deposits.
- **Time Deposits:** Balances increased by **19%**, rising from **USD 775 million to USD 922 million**. Interest paid decreased from **USD 39 million to USD 38 million**, as a result of lower funding costs following the Fed's rate cut.
- **Provisions:** In 2024, loan loss provisions increased by **58%**, due to adjustments in risk models.
- **Net Income:** Net income for the year increased by **7%**, closing at **USD 16,5 million with a return on equity of 16,1%**.

Occidental Bank (Barbados) Ltd.

In 2025, our subsidiary's operations in Barbados reported the following results:

- **Portfolio:** It recorded an increase of **USD 29,4 million**, equivalent to **18%**.
- **Investments:** the portfolio decreased by **5,2%**, equivalent to **USD 5,5 million**, primarily due to the maturity of securities during the year and sales of securities in the second half of the year.
- **Liquidity:** decreased by **16%**, equivalent to **USD 9,1 million**, due mainly to the increase in the loan portfolio.
- **Time Deposits:** increased by **3,3%**, equivalent to **USD 18 million**. This performance was reflected in a **7,1%** increase in expenses, associated with the higher volume of time deposits, although the impact was moderate due to the decline in funding costs.
- **Provisions:** There was a **9%** decrease, associated, in part, with adjustments to risk models.
- **Net Income:** Net income for the year increased by **0,8%**, closing at **USD 5,2 million, with a return on equity of 10,3%**. It should be noted that, during 2025, the tax rate in Barbados rose to 15%, higher than the 3% rate in effect in 2024.

For the year 2025, neither Banco de Occidente Panamá nor Occidental Bank Barbados reported any material impacts on liquidity or solvency.

The subsidiaries have posted solid financial results in recent years based on sound cost-cutting strategies, strategic alignments with their parent company, and strong long-term funding structures, among other factors, which help support the assumption that the business will continue to operate for the next twelve months.



Fiduciaria de Occidente S.A.

In 2025, the subsidiary **Fiduciaria de Occidente S.A.** reported the following key operational results:

- Assets increased by 5,7% between December 2024 and December 2025, equivalent to an increase of \$27.177 million, rising from \$478.707 million in 2024 to \$505.884 million in 2025, a change driven primarily by a 48,6% increase in accounts receivable and a 30,8% increase, rising from 25.559 to 33.423 in 2025.
- Liabilities decreased by -4,4% between December 2024 and December 2025, equivalent to a decrease of \$1.694 million, falling from \$38.812 million in 2024 to \$37.119 million in 2025, a variation distributed across the various relevant liability categories, where labor obligations decreased by \$3.139 million, other liabilities decreased by \$114 million, accounts payable increased by \$2.956 million, and provisions increased by \$1.063 million.
- Equity increased by 6,6% between December 2024 and December 2025, equivalent to an increase of \$28.870 million, rising from \$439.895 million in 2024 to \$468.765 million in 2025, a change driven by a 17,5% increase in retained earnings, which rose by \$33.028 million, and a 3,5% decrease in net income for the year, which fell by \$3.059 million.
- Revenue increased by \$28.157 million (+13,6%), rising from \$207.692 million in 2024 to \$235.849 million in 2025, a change explained by the \$24.526

million (+18,1%) increase in trust fees, and by the decrease of \$912 million (-8,2%) in net portfolio income and the increase of \$536 million (24,8%) in other income, while income from dividends and the equity method of accounting for investments in other companies increased by \$4.006 million (+6,8%), rising from \$59.212 million in 2024 to \$63.220 million in 2025.

- Pre-tax income decreased by \$4.619 million (-4,5%), falling from \$102.002 million in 2024 to \$97.382 million in 2025, and net income decreased by \$3.059 million (-3,5%), falling from \$88.189 million in 2024 to \$85.129 million in 2025.

In terms of **liquidity and solvency**, the Trust Company did not experience any material changes in its financial position, as liquid investments plus cash on hand remained at adequate levels: for 2024 and 2025, they reached **\$85.023 million and \$63.727 million**, respectively. Regarding the solvency margin, double-digit indicators were maintained in both years, with values of **28,25%** in 2024 and **24,05%** in 2025, levels well above the regulatory minimum (**9%**).

In accordance with the requirements of **Article 47 of Law 222 of 1995**, it is hereby stated that there have been no significant external or internal events that could affect the normal course of the Trust Company's operations or its results from the balance sheet date to the date of this report.

However, we hereby state that through **Public Deed No. 2.647 of December 19, 2025**, issued by Notary Public No. 37 of Bogotá, D.C., and registered on **January 1, 2026**, with the Chambers of Commerce of Bogotá and Cali, the spin-off was formalized between **Fiduciaria Bogotá S.A., Fiduciaria de Occidente S.A., and Fiduciaria Popular S.A.** (the splitting companies) and **Aval Fiduciaria S.A.** (the beneficiary company). Pursuant to this transaction, the splitting companies, without being dissolved or liquidated, spun off en bloc a portion of their assets representing the entirety of their fiduciary business—including managed fiduciary businesses and products, liabilities and assets related to said business, as well as the transfer of associated contractual positions—to be absorbed by Aval Fiduciaria S.A.

The spin-off was approved by the **Financial Superintendency of Colombia** through Resolution No. 1777 of **September 23, 2025**, which became effective on **October 10, 2025**.





Ventas y Servicios S.A. — NEXA BPO and Main Affiliates

In 2025, the subsidiary **Ventas y Servicios S.A. — NEXA BPO** achieved the following operational milestones:

- **Sales:** grew **5,98%** compared to 2024, closing at **\$373 million**.
 - **Fixed costs:** decreased by **0,33%** compared to 2024, closing 2025 at **\$41 million**.
 - **Operating cost:** increased by **1,25%** points compared to 2024, reaching **\$329,7 million**.
 - **Net income:** closed at **\$1.079 billion**, **51,5%** less than in 2024.
- Regarding our main affiliates, the following results stood out at the end of 2025:
- **Porvenir S.A.:** reported total assets of **\$4,4B** at year-end, achieving annual growth of **15,20%**. Net income as of December 31, 2025, was **\$701.905 million**, up **14,54%** compared to December 2024.
 - **Corporación Financiera Colombiana S.A.:** As of December 31, 2025, it reported total assets of **\$28,90 billion**, representing annual growth of **7,26%**. It achieved annual net income of **\$503.448 million**, with annual growth of **53,65%** compared to 2024.
 - **Gou Payments EASPBV S.A.:** As of December 31, 2025, the company reported total assets of **\$18.274 billion**, representing annual growth of **6,31%**. The loss as of December 31, 2025, was **\$5.798 billion**.
 - **AVC (Aval Valor Compartido SAS):** was incorporated in April 2025 as a commercial entity. It reported total assets of **\$56.361 million** as of December 31, 2025, and a loss of **\$1,3 million**.

Financial stability and profitable growth

Off-Balance-Sheet Transactions

For the financial statements presented as of **December 31, 2025**, no off-balance-sheet transactions were recorded. All economic events have been recognized in accordance with accounting legislation and were subject to review by the **Bank's internal audit and the statutory auditor KPMG**.

After the close of the fiscal year

By means of Public Deed No. 2,647 dated December 19, 2025, issued by Notary Public No. 37 of Bogotá, D.C., the partial spin-off of Fiduciaria de Occidente S.A. in favor of Aval Fiduciaria S.A. ("Aval Fiduciaria"), through which Fiduciaria de Occidente S.A., without being dissolved or liquidated, transferred to Aval Fiduciaria S.A. a block of assets corresponding to the fiduciary business unit, including the assets, liabilities,





and contracts associated with said operation. The asset block spun off from Fiduciaria de Occidente S.A. was \$50,860, and Banco de Occidente’s equity interest in the spin-off was \$48,305. The Spin-off was previously approved by the Financial Superintendency of Colombia, in the exercise of its legal powers, through Resolution No. 1777 of September 23, 2025.

In consideration for the transfer, the Bank received 29,589,247 common shares of Aval Fiduciaria S.A., increasing its stake to a total of 31,707,111 common shares, equivalent to a 24.46% stake in its share capital.

In accordance with IAS 10 — Events After the Reporting Period, this transaction constitutes a subsequent

event that does not require adjustments to the Separate Financial Statements as of December 31, 2025.

However, in fiscal year 2026, the accounting effects arising from the transaction will be recognized, including:

- The recognition of the investment in Aval Fiduciaria S.A.
- The derecognition of the assets and liabilities associated with the spun-off business unit.
- The application of the equity method in accordance with IAS 28.



Free Circulation of Invoices

In compliance with the provisions of **Law 1231 of 2008** and its amendment by **Law 1676 of 2013**, we hereby state that we do not retain invoices from our suppliers. To this end, we have established internal policies designed to ensure the **free circulation of invoices** issued by vendors or suppliers.

Transactions with Related Parties

For transactions with affiliated parties or related parties, we have procedures defined in **manual MAN-COL-431**, which stipulates that transactions conducted with customers classified as affiliated

parties or related parties must be approved by the **Bank’s Board of Directors**. To this end, we maintain a reference list that allows the responsible departments to identify when a customer is included on this list. Additionally, we conduct a **monthly review** to verify that new active transactions with affiliated parties and related parties have the required approval from the Board of Directors.

Relationship Between the Bank and Its Subsidiaries

Below, we show the amounts of transactions conducted between the Bank and its Subsidiaries, which are included in the 2025 **Balance Sheet and Income Statement**.

Accounts	Banco de Occidente Panamá	Fiduciaria de Occidente	Occidental Bank Barbados	Sales and Services	Grupo Aval
Total Assets	370.584	454.135	187.728	23.566	125.606
Total Liabilities	-	16.151	-	4.169	58.811
Total Income	1.534	2.592	1.602	7	13.023
Total Expenses	-	10.507	-	116.239	88.982



Transactions with Shareholders and Executives

As of **December 31, 2025**, the Bank recorded **loans granted to executives totaling \$15.875 billion**, consisting primarily of **credit card** transactions and loans for the **purchase of homes, vehicles, and personal loans**, under the terms and conditions established by the Bank for its employees.

Additionally, the sole shareholder with a stake exceeding **10% is GRUPO AVAL ACCIONES Y VALORES S.A.**, which maintains an ordinary portfolio with the Bank.

Year 2025	Individuals with control over Banco de Occidente	Key Management Personnel	Companies belonging to the same group	Associates and joint ventures	Entities controlled by individuals included in categories 1 and 2	Entities that have significant influence through persons included in categories 1 and 2
Assets	21	17.833	671.935	237.492	668.291	5.243
Liabilities	89.842	59.119	1.774.010	47.471	490.760	2.167
Revenue	10	2.169	292.089	143.356	168.025	326
Expenses	6.021	5.442	178.290	106.919	36.927	171



Certification issued by the statutory auditor

Please refer to page 1 of Annex I and page 1 of Annex II, corresponding to the statutory audit reports on the financial statements.

Risk Rating

As of the end of 2025, we continue to underpin our financial management with ratings that reflect market confidence and recognition of the Bank's strength, both locally and internationally.

- **Local ratings:** for the twenty-eighth consecutive year, we have maintained the **triple-A rating**—the highest credit quality for long-term debt—and **BRC1+**, the highest payment certainty for short-term debt, as assigned by **BRC Standard & Poor's**. We also hold a national rating from **Fitch Ratings of AAA (Col)** for long-term debt with a Stable outlook, and **F1+ (Col)** for short-term debt.
- **International ratings:** According to the update by **Fitch Ratings**, we hold a **Long-Term BB** rating with a **Stable** outlook and a **Short-Term B rating**, supported by the quality of our assets, our business model, and our ability to sustain modest profitability and capital metrics.





We continue to strengthen our reputation and brand strategy:

On the brand front, in 2025 we strengthened and acknowledged our connection with people through focus groups held in Barranquilla, Bogotá, Cali, and Medellín, where we spoke with customers, sales teams, and employees. Thanks to these sessions, we confirmed that trust and closeness are the attributes that best represent us and reaffirm our commitment to building lasting relationships with those who seek to make a difference; that is why we developed our new brand campaign: “We choose to be on your side, on the side of those who make a difference.”

We also participated in national cultural events that promote our identity, including the Manizales Fair, the Flower Fair, the Barranquilla Carnival, the Minfull Festival, the Cartagena Festivities, and the Cali Fair, among others. This strengthened our regional presence and our bond with our customers. Also, as part of our 60th anniversary, we illuminated the Bank’s main headquarters in Cali, giving the city a new symbol of regional pride.

Similarly, we promoted Cali’s culture and salsa through the documentary *La Salsa Vive*, as well as our support for *Ensálsate* and *Delirio*. Finally, we promoted sports, health, and family unity by supporting major sporting events such as the Giro de Rigo in Barranquilla, the Cali Marathon, the Medellín Marathon, Yeison Aristizabal’s Maratón de Sueños at the national level, and the Juancho Correlón Races in Cali, reaffirming our commitment to stand by people during the moments that inspire them.

We launched the 42nd edition of our eco-book “Colombia, The Garden of Orchids,” reaffirming our commitment to showcasing our country’s natural riches and continuing to raise awareness about their care and preservation. **We also welcomed a new collaborator to our team who will serve as our sustainability spokesperson: Occigüiro.** We created **new spaces for conversation (ECOS, Banco de Occidente’s Sustainability Forum), fostering community and networking among individuals and companies interested in sustainability.** We exceeded our goal for visitors and views on our Planeta Azul Community, **reaching 192.000 views and 119.000 visitors.**

Finally, on the reputation front, we secured fourth place for the second quarter in the Punto Cardinal ranking of the banking and financial sector. We moved closer to our goal of entering the top 50 of Merco Empresas, climbing 21 positions from **73rd to 52nd** and gaining one position in the sector to reach **6th place.** Regarding press release management (Freepress) with our partner Llorente y Cuentia (Llyc), **we published 970** press releases in the media, reaching an **audience of over 579 million—nearly 11 times the country’s population.**

We continue to support our clients through our Distribution Desk and Economic Research team:

We reached more than **500 companies** in the country’s major cities through **23 in-person forums** on economic topics. We hosted **two nationwide virtual events with over 3.000 attendees,** featuring Maria Claudia Lacouture and Juan Carlos Echeverry. We supported our clients with a regional tour schedule, visiting key cities such as Cali (8), Medellín (5), Pereira (3), Cartagena (2), and Manizales (2), where we held



our “A 3 Voces” forums alongside the presidency and forums at universities.

We made **significant progress in establishing ourselves as leaders in the financial sector, with 345 media appearances** and an estimated audience of 122.3 million people. We increased the **readership** of our reports by **22%, reaching over 5.000 readers** who follow our daily analysis of the economic landscape, providing information relevant to their business and decision-making.

From the **Distribution Desk**, we closed the year with a profit of over \$104 billion, **achieving 117% of the established target.** We held a **20% market share in TES** for clients, with a volume of \$68 trillion, **representing a 12,53% increase compared to the previous year.**

We promoted the use of the **Occidivisas** tool, **facilitating the trading of foreign currencies through our Personal Banking and OcciRed portals,** resulting in a trading volume of **USD 374 million**—a figure seven times higher than that recorded in 2024.



Key Developments

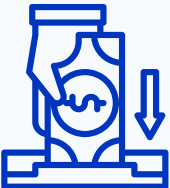
Corporate Banking Results

In 2025, the Corporate Banking Division continued to advance our mission of driving growth for businesses and contributing to the country’s sustainable transformation, while maintaining a recommendation rate that reflects our customers’ trust.



→ **Customer Recommendation (NPS):** We closed the year at **69%**, meaning 7 out of 10 customers recommend our service. This result was supported by initiatives aimed at strengthening the customer experience, and we remain committed to continuing to advance practices that improve this key indicator for our value proposition.

We continue to strengthen our value propositions for strategic segments, with the conviction that every company, institution, and public entity needs tailored support. That is why, in 2025, we strengthened our **Close, Specialized, and Timely (CEO)** service model, with comprehensive solutions that adapt to each client’s reality and the unique challenges of their business.



→ **Loans and deposits:** We reached loans exceeding **\$33,9 billion** with annual growth of **3,95%** (equivalent to **\$1,3 billion**), achieving **96,8%** of our target and an **8,99%** market share. In deposits, we recorded growth of **10,14%**, with an increase of **\$3,9 billion**, a **101,52%** target achievement, and a market share of **7,13%** (as of December 26).



→ **Foreign currency and sustainable lines:** We rank fourth in Colombia in foreign currency with a **10,24%** market share, consolidating our position as a comprehensive, accessible, agile, and passionate financial option. Additionally, we managed credit lines with correspondent banks totaling **USD \$110 million** with a sustainable focus and use (environmental and social), contributing to our “**We Are Sustainable**” strategy and the growth of the foreign currency portfolio (**USD 50 million Citibank and USD 60 million CAF — Development Bank of Latin America and the Caribbean**).





Here is the performance by segment:

- **Government Segment:** We achieved a **22,96%** share of deposits held by the **General Accounting Office (CGN)**. In the **official checking account** system, we recorded **12,16%** growth, ranking first. In addition, we maintained a non-performing loan ratio of **0,34%** and a Net Promoter Score (**NPS**) of **83%**. In loans, we achieved **+9%** growth, reaching **\$3,8 billion**.
- **Corporate and Institutional Segment:** We achieved a **32,1%** market share in loans, **38,7%** in deposits, and **39,4%** in net income (as of November 2025). We optimized the calculation of the **Net Stable Funding Ratio (NSFR)** and supported the structuring and financing of significant energy transition projects under the energetic transition initiative, including Colombia's largest independent solar park, "**Puerta de Oro,**" and the **Túnel de Oriente** connecting Medellín to the airport, among others. The Net Promoter Score (NPS) closed at **64%**.
- **Corporate Segment:** We maintained our **second-place position** in our clients' wallet share, with an **18,93% share**. We strengthened our value proposition through forums and certificate programs in the Business Classroom, designed to meet our clients' needs, achieving **over 20.000 visits** and closing with an NPS recommendation rate of **71%**.

- **SME Segment:** We remained leaders in wallet share, with **28,04%**. We drove customer engagement through advanced analytics models and digital marketing campaigns, achieving a **25%** increase and generating **\$0,8 billion**. In addition, we strengthened our SME Community with forums, certificate programs, podcasts, and networking events, training **more than 108.000 people** and impacting **17.000 companies**. This effort was recognized at the **Yo Soy Aval Awards** and resulted in an **NPS** recommendation score of **61%**.

We continue to strengthen our commercial management, with a clear focus: **better supporting each segment, enhancing our teams' capabilities, and making our service more effective through proximity and specialization.**



Here's how we're driving this evolution in 2025:

- **Strengthening commercial capabilities:** we continue to train our sales force in initiatives such as **The Master KAM Empresarial**, as well as in **sales skills and value proposition**. Additionally, we are participating in the implementation of **MIA (My Financial Assistant)**, an artificial intelligence agent specialized in financial and commercial analysis. We are also executing the “**gold-standard clients**” certification strategy, generating **\$355 billion** in new opportunities.
- **Improvements in support and engagement:** We adjusted the processes of the **Business Support Desk**, enabling a specialized support line for clients and managers, and made progress in developing a dedicated **engagement** line, currently in the implementation process. Additionally, we conducted a strategic update of the **SME segment's scope**, adjusting service capacity and focusing commercial efforts on clients with greater financial depth and growth potential.
- **Prioritization and focus on higher-value customers:** We strengthened the prioritization model by incorporating external potential variables and commercial viability criteria. This allowed us to classify the customer base and manage it more effectively, maximizing portfolio profitability and focusing on higher-value customers. In this

regard, we achieved **105%** compliance with the **Financial Superintendency's** requirements, with indicators of **90%** for beneficial ownership and **85%** for data updates.

- **Regional presence and connection to the community:** We strengthened our presence in the regions by promoting our **CEO** value proposition (**Close, Specialized, and Timely**) and our portfolio of financial solutions through partnerships, trade shows, and impactful events in target segments, such as **women leaders**.
- **Marketing and valuable content:** We ran campaigns that reached **over 9 million people**. And through our “Specialists” pillar, we provided valuable information via **in-person tax forums** featuring expert **Tulio Restrepo**, held in the country's major cities, with attendance (both in-person and virtual) of **over 7.500 people**.

Through our **agile framework and its scaling**, we succeeded in turning priorities into concrete progress for our clients, strengthening our value proposition with solutions that are more digital, timely, and aligned with the needs of each sector.

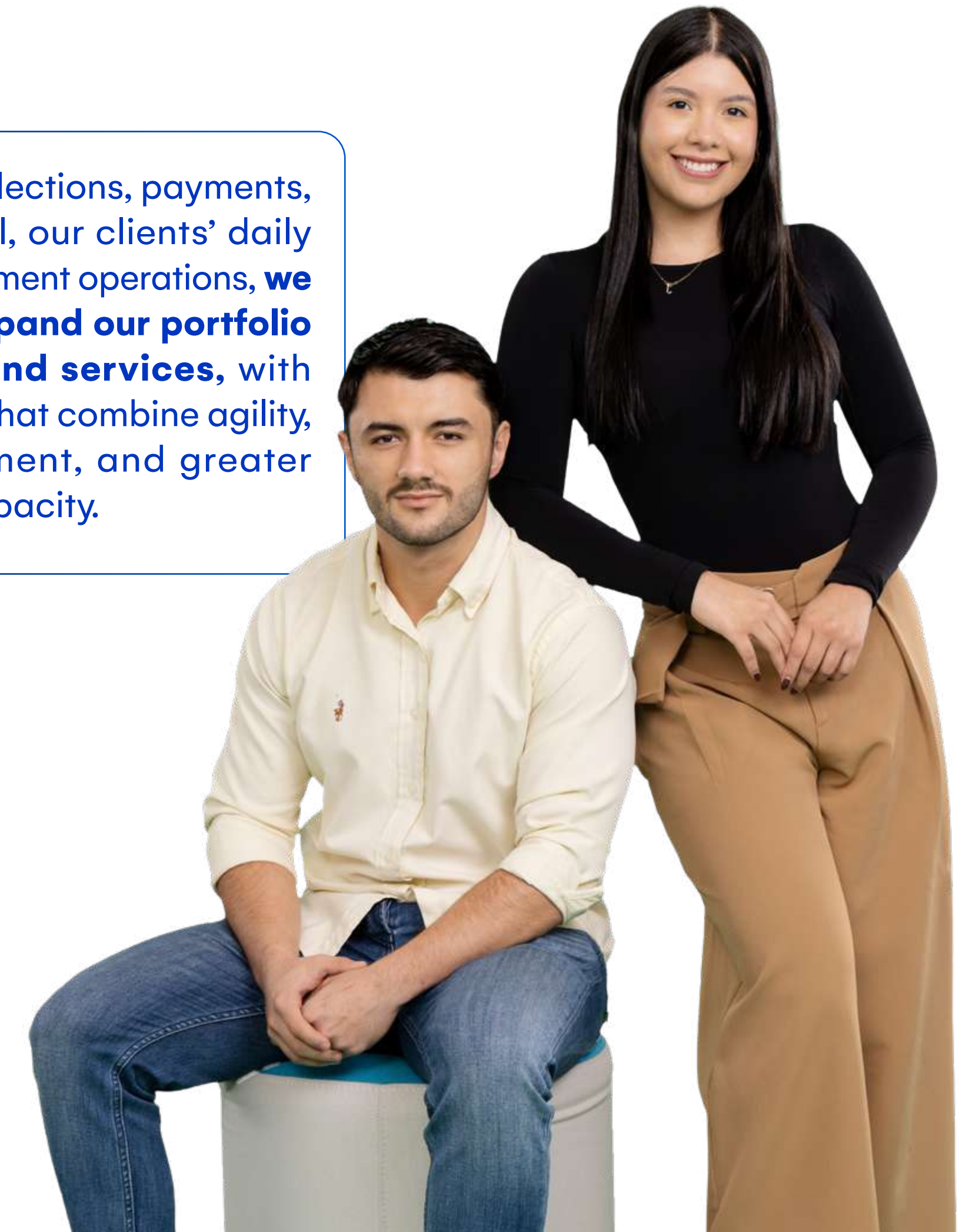




Key achievements in 2025:

- **Finagro — Substitute Portfolio:** we disbursed **\$3,81 billion, ranking second among AVAL Group** banks in the use of this line of credit. Additionally, we were recognized by **Finagro** as a strategic partner for our commitment to transparency and quality in managing investment controls, driving the growth and modernization of the agricultural sector.
- **Digital Payroll:** We went live in **June**. We successfully established **140 mass-market agreements** covering **5.187 savings accounts** through a digital process requiring no documents or forms, with **80%** of users activating their accounts **independently**.
- **Factoring:** We consolidated our **fourth-place market position**, with **27%** growth in placements and a year-end balance of **COP \$7,4 billion**, driven by an increasingly digital value proposition and the development of partnership-based business models.
- **Product development and enhancement:** We strengthened our offering with significant improvements and new features, including:
 - In **Crédito Constructor**, we implemented payment solutions such as **PSE**, enabled the **sending of statements to multiple destinations**, and streamlined the **portfolio purchase** process.
 - For **foreign currency** products, we implemented the **SWIFT** regulations for the SRC2026 release, successfully migrating to **ISO 20022**.
 - We formalized **special foreign currency lines** for financed products.
 - We activated the **CERTs tax refund** for exporters.
- **Leasing partnerships:** We reaffirmed our presence in this business with **over \$136 billion** in placements through our agreements.
- **Crédito Constructor — growth and green lines:** we generated **45 approved projects** under green lines totaling **\$1,6 billion**, with **cumulative disbursements of \$680 million** and a national presence reflected in **140 billboards installed** (with **18 additional ones** in the works with clients). In the year Crédito Constructor celebrated its **10th anniversary**, we reaffirmed our leadership in financing **NO VIS** projects, reaching **4th place** in the market, driven by portfolio growth exceeding that of the sector'. We closed the year with a balance of **\$1,3 billion and an 8,5% share** of the Bank's total portfolio, strengthening our portfolio of specialized solutions for the construction sector.

To facilitate collections, payments, and, in general, our clients' daily cash and investment operations, **we continue to expand our portfolio of solutions and services**, with developments that combine agility, self-management, and greater operational capacity.





Progress and solutions implemented in 2025:

- We **established ourselves as leaders within Grupo Aval** in collections and payments via QR codes and the AvalPay gateway, strengthening immediate collections and laying the groundwork for corporate collections through Bre-B.
- We launched self-service key registration and QR code generation via OcciRed, along with **35 usability improvements** and platform redesigns; we implemented **40 experience enhancements** in the Host-to-Host (H2H) channel and deployed over 140 web services as part of the third-party payment reengineering initiative.
- **We strengthened** Special Administrative Services (SAES) as a source of new business and customer loyalty. We expanded our correspondent network coverage to **over 82.000 service points** nationwide (Efecty, Puntored, SuperGiros, Punto de Pago, and Éxito).
- **Digital account opening for SMEs and Corporate clients:** We implemented digital opening of **checking and savings accounts** through the **Digitally Empowered Executive** suite, targeting **non-PEP SME and Corporate** clients, with updated information in CRM/Siebel and SARLAFT. This tool now accounts for **10% of digital account sales**; after two months of widespread adoption, we closed the year with **117 active accounts across**

103 clients, with an average balance of **\$2,8 billion**. With this remote process, we reduced the account opening time from **1,5 days to 3,2 hours**, generating significant operational efficiencies.

- **Cash management and corporate credit cards:** In cash management product implementations, we achieved **2,3 times more implementations** compared to the previous year, consolidating the adoption of the portfolio among our clients. In **corporate credit cards**, specialists contributed **37% of total revenue**, achieving **108%** of the target. This was reflected in the following impacts: **third-party payments** (12,6 million transactions totaling **\$368,7 billion**), **physical collections** (11,4 million transactions totaling **\$13,9 billion**), and **PSE collections** (29 million transactions totaling **\$43,3 billion**).
- **Commercial and Operational Efficiency in SMEs:** We reorganized the **Cash Management — SME Implementation Desk**, separating implementation tasks from commercial activities. This led to a **2,07-fold** increase in closed and implemented deals, improving operational and commercial efficiency. We increased the team's overall compliance by **11 percentage points** (from **89% to 100%**) and reduced the number of underperforming specialists by **6%**. Additionally, we achieved a **20%** increase in collections from managed accounts, boosting productivity and deal closures.





Retail Banking Results

In 2025, at Retail Banking, we remained committed to people development, business growth, and the country's progress. It was a year of challenges—including portfolio acquisitions, inflation that did not behave as expected, and market liquidity needs—but also of solid results and progress that drive us to continue improving.

These were our main achievements:

- **Portfolio and Growth Dynamics:** We reached **\$17,2 billion** in portfolio, an increase of **\$851 million** compared to the previous year (**+5,2%**). This growth was driven by lower-risk products such as **Housing, Vehicles, and Payroll Loans**. Mortgages grew **26,4%** (an increase of **\$801 million**), Auto Loans increased **3,2%** (**\$80 million**), and Payroll Loans grew **3,8%** (**\$199 million**).
- **Disbursements:** We grew disbursements by **10%**, reaching **\$11,7 billion**, broken down into **\$1,4 billion** for Housing and **\$10,3 billion** for Consumer Loans.
- **Portfolio and quality:** We maintained a portfolio aligned with our low-risk product strategy: **Payroll Loans \$5,4B, Housing \$3,83B, Free Investment \$3,34B, Vehicles \$2,55B, and Credit Cards \$1,54B**. Thanks to this strategy, we achieved a Consumer **Non-Performing Loan Ratio (NPL)** of **3,88%** as of November 2025, below the sector average (**4,91%**).
- **Stable deposits:** We closed the year with **\$4,51 billion** and **22%** growth, driven by CDs and savings



accounts, which grew **27%** and **22%**, respectively. This result was driven by new products such as **Kubo Rentable, accounts for the self-employed**, campaigns targeting affluent **Elite Plus and Elite** customers, and our position as a market leader in CD rates.

- **Preference in Core Segments:** We remain the top choice in the banking system for our key customers. As of December 2025, we achieved a market share of **60% in Elite Plus, 38% in Elite, 35% in Preferente Plus, and 20% in Preferente**.
- **Work Environment and Satisfaction:** We improved our work environment, raising the **Great Place to Work** score from **84,8% to 90%**, and increased external customer satisfaction to **64% (NPS)**.
- **Housing and Vehicles:** In Housing, we disbursed **\$1,4B, a 40,4%** increase compared to 2024,

thanks to the strengthening of our strategy targeting Colombians abroad, the increase in the penetration of subrogated projects from **18% to 42%**, our collaboration with construction companies, and improvements in legalization and service perception. In Vehicles, we disbursed **\$1,3B, with 4,3% growth**, driven by the expansion of independent customers, growth in used vehicles, the self-managed channel, and our presence at dealerships.

- **Credit Cards:** We recorded **\$4,1 billion** in revenue in 2025, exceeding the target by 108% and growing **14,8%** compared to 2024.
- **Value proposition in high-end segments:** We relaunched the **Black Mastercard with 5% cashback** on entertainment and integrated the **Priceless** premium experiences platform,

positioning ourselves as the only bank in Colombia with this ecosystem of benefits.

- **Product Innovation and Sustainability:** We began issuing the **Black Mastercard Metal Card**, made from **recycled stainless steel**, as a demonstration of our commitment to sustainability and a strategic focus on high-value segments.
- **Partnership with Terrasos:** We established a pioneering partnership that allows Colombians to invest in biodiversity through an average percentage of their purchases made with the **Classic Credencial Card** (Mastercard or Visa). The Bank will allocate **1% of the average daily turnover** during the campaign period to purchase **Tebu®**, supporting the restoration of **340 hectares** in the **Bosque de Niebla — El Globo Habitat Bank**.



- **UNICEF Card:** With **14.524 active cards**, we have donated more than **\$2.134 billion**, benefiting **18.018 people—6.126 women, 5.586 men, and 6.810 children and adolescents**—through initiatives in **water, sanitation, and hygiene**.
- **Green Loans:** We contribute to sustainability by disbursing Green Line loans for Vehicles and Housing. We allocated **\$220.294 billion** to hybrid and electric vehicles, and disbursed **\$3.102 billion** for **sustainable housing or housing with green technologies**.
- **Insurance commissions:** We met our commission income target, contributing **\$131.393 million** to the Bank's profitability. This result was driven by new products such as **"Vive la Vida" auto insurance (1.864 policies)** and **"Todo Riesgo Pyme"** insurance, as well as strategies to expand sales in branches and at teller windows, with **2.762 policies** issued. We also increased penetration in payroll deduction for retirees, achieving **32%** growth in insurance revenue in this segment.

We actively contribute to government financing and the development of society through **timely tax compliance**. For us, this management is not merely a regulatory requirement: it is a concrete way to **nurture the trust** we build with our stakeholders and to support the country's responsible growth.

- **Digital transformation and efficiencies:** through our digital channels, we continue to transform customer experience. We implemented the **BRE-B** project with the activation of **320 million** accounts, representing **\$526 million** and **2,9 million** transactions. The WhatsApp channel grew by **12%** in self-service usage, and we enabled **BRE-B** transfers through this channel. Our **Contact Center** generated budget savings of **\$593 million** and drove new business worth **\$42.871 billion**, in addition to the sale of **486 policies, 667 account openings, and \$5.297 billion in CDs**. In branches, we achieved efficiencies by shifting **more than 1.400.000** in-person transactions to digital channels, and thanks to the optimization project, we achieved savings of **\$3,2 billion**.

Fiscal and Tax Management

| GRI 207-1; 207-2; 207-3; 207-4 |

At Banco de Occidente, we view fiscal management as a concrete way to contribute to the country's development. That is why we act with transparency and consistency, aligning our decisions with current regulations and a vision of sustainability that strengthens trust, accountability, and integrity in every transaction.

We actively contribute to government financing and the development of society through **timely tax compliance**. For us, this management is not merely a regulatory requirement: it is a concrete way to **nurture the trust** we build with our stakeholders and to support the country's responsible growth.

This principle is reflected in our **Tax Policy**, which guides our actions with:

- ✓ **Transparency and clarity** in how we determine, report, and pay our obligations.
- ✓ **Order and consistency** in our processes, ensuring traceability and alignment with financial reporting.
- ✓ A **socially responsible** perspective, recognizing that full tax compliance also generates public value.





Fiscal Approach

Our fiscal management is based on **clear governance**, defined responsibilities, and an ongoing commitment to **transparency and regulatory compliance**. The **Vice Presidency of Finance and Strategy** is the executive body that reviews, approves, and adjusts the Bank's strategy and **Fiscal Policy** whenever necessary, ensuring its relevance in light of regulatory changes and business developments.

To achieve this goal, we conduct a comprehensive analysis of **both typical and atypical transactions and economic events**, taking into account current regulations and their tax implications, as part of our strategy for **preventing and mitigating risks**, including tax evasion.

Our approach combines prevention, control, and specialized support to ensure regulatory compliance through:

- ✓ **SOX internal controls**, which strengthen the traceability, consistency, and substantiation of financial and tax information.
- ✓ **Operational risk management (SARO)**, aimed at identifying and mitigating risks that may affect tax processes.
- ✓ **Support from specialized external advisors**, who assist with technical analysis and the documentation of criteria when applicable.

This work is supported by reports and periodic review sessions with the Vice President in charge, which allows us to make informed decisions, strengthen transparency, and ensure responsible tax management aligned with our business and sustainability strategy.

Relationship with Business Strategy and Sustainable Development

- Our tax approach is integrated into the Bank's strategy because we **comprehensively evaluate** every transaction or economic event—including atypical cases—considering not only legal compliance but also the potential **tax impact**.
- In doing so, we seek to anticipate and prevent risks, strengthen transparency, and ensure responsible management, consistent with our vision of sustainability.

Tax Governance, Control, and Risk Management

Our tax governance is based on a clear principle: **compliance with the Tax Policy is a commitment of the entire organization**, from senior management to the teams involved in processes with tax implications. This allows us to act with consistency, transparency, and responsibility in every decision.

We integrate the tax approach into operations through **policies and controls** that strengthen traceability and prudent risk management. We have **SOX**, which reinforces information assurance and internal controls, and **SARO**, which supports the management of operational risks associated with relevant processes.

When an uncertain tax position arises due to differences in interpretation or regulatory gaps, we document the case with the support of **tax advisors** and escalate it to the **Vice President** and, when applicable, to **the President**, for evaluation and management based on technical analysis and evidence.

We assess compliance with this framework through an **annual external tax audit**, which reviews compliance and validates the quality of tax processes and deliverables. Additionally, we strengthen internal capabilities through **training** in collaboration with industry associations and specialized institutions such as **Asobancaria, ANDI, and ICDT**, among others, keeping the team up to date on regulations, decrees, resolutions, case law, and applicable doctrine to **minimize risks and promote an optimal tax burden**.

To address concerns related to integrity and corporate conduct in tax matters, we have **mechanisms for reporting to regulatory bodies** via physical channels and email, ensuring traceability and a timely response. Finally, the verification of tax-related content relies on specialized third parties: the **external tax auditor** reviews tax returns and issues its annual audit report, and **external tax advisors** assist in verifying the income tax return, retaining supporting evidence in all cases.



Stakeholder Engagement and Management of Tax-Related Concerns

Our commitment to tax authorities is supported by a robust compliance framework: we have **tax advisors**, as well as **internal and external audits** that help ensure regulatory compliance. Additionally, the **tax audit** acts as a key mechanism for identifying potential errors and validating their correction, in line with legal requirements.

Regarding the development and discussion of public tax policies, we participate through trade groups and associations such as **Asobancaria, ANDI, and ICDT**, among others. These forums allow us to contribute technical expertise, share best practices, and stay aligned with regulatory debates relevant to the sector and the country.

To gather and consider opinions and concerns—including those of external stakeholders—we participate in **meetings and forums** where observations, needs, and opportunities for improvement are raised. These meetings result in agreements and action plans, documented through **minutes or emails**, ensuring traceability and follow-up.

Country-by-Country Report

For the purposes of this report, the **tax jurisdiction reported is Colombia**, as this is where the entities included in the audited consolidated financial statements and the financial information filed with public registries are resident for tax purposes. This definition allows us to present information that is consistent and traceable to the published financial statements.

The following table presents the results and key figures from our tax information:

Items	BANCO DE OCCIDENTE S.A.			
	2025	2024	2023	2022
	Colombia			
Organization's main activity	Establecimiento Bancario			
Number of employees and breakdown	7,054 employees distributed as follows: 723 on fixed-term contracts, 6,179 on permanent contracts, 152 on SENA apprenticeship contracts	7,020 employees distributed as follows: 498 on fixed-term contracts, 6,197 on permanent contracts, 325 on SENA apprenticeship contracts.	6,984 employees distributed as follows: 496 on fixed-term contracts, 6,143 on permanent contracts, 345 on SENA apprenticeship contracts.	7,113 employees distributed as follows: 521 on fixed-term contracts, 6,262 on permanent contracts, 330 on SENA apprenticeship contracts.
Revenue from sales to third parties	\$ 8.750	\$ 8.924	\$ 8.793	\$ 5.346
Revenue from intra-group transactions with other tax jurisdictions	\$ 3	\$ 2	\$ 2	\$ 2
Pre-tax profit or loss	\$ 537	\$ 533	\$ 374	\$ 616
Tangible assets other than cash and cash equivalents	\$ 573	\$ 588	\$ 522	\$ 590
Income tax paid in cash	\$ 531	\$ 518	\$ 480	\$ 285
Accumulated income tax on earnings or losses	-\$ 660	-\$ 555	-\$ 855	-\$ 524
Reasons for the difference between the accumulated corporate income tax on profits or losses and the taxes calculated by applying the statutory tax rate to pre-tax profits or losses	The difference arises from income not subject to tax under tax regulations, such as: the equity method, dividends, exempt income, and the application of differential rates; as well as expenses not allowed under tax regulations, such as: non-deductible taxes and provisions, among others.	The difference arises from income not taxed under tax regulations, such as: the equity method, dividends, exempt income, and the application of differential rates; as well as expenses not allowed under tax regulations, such as: non-deductible taxes, provisions, among others.	The difference arises from income not subject to taxation under tax regulations, such as: the equity method, dividends, tax-exempt income, and the application of differential rates; as well as expenses not allowed under tax regulations, such as: non-deductible taxes, provisions, among others.	The difference arises from income not subject to tax under tax regulations, such as: the equity method, dividends, tax-exempt income, and the application of differential rates; as well as expenses not allowed under tax regulations, such as: non-deductible taxes, provisions, among others.

*For the years 2022 and 2023, total operating revenue was considered.

*Financial figures in millions (MM) of COP.



Reported tax rate and cash tax rate

As part of our commitment to tax transparency and reporting quality, we present a comparison between the reported tax rate (derived from the income statement) and the cash tax rate (derived from the cash flow statement), with data from the last three years. This information is consistent with the Bank's financial statements and allows for the visualization of the evolution of the tax burden from two perspectives: accounting and cash.

Below, we detail the Bank's tax obligations:

Financial Reports	2025	Calculated average rate (percentage change 2024 vs. 2025)	2024	Calculated average rate (percentage change 2023 vs. 2024)	2023	Calculated average rate (percentage change 2023 vs. 2022)	2022
Pre-tax profit (loss)	\$ 1.082	2,2%	\$ 1.059	19%	\$ 888	-11%	\$ 1.000
Taxes declared	\$ 548,45	-3%	\$ 564	23%	\$ 458	-8%	\$ 497
A. Accrued income tax (current year).	\$ 3,41		\$ 38		-\$ 56		\$ 113
B. Indirect taxes	\$ 254,64		\$ 229		\$ 236		\$ 158
VAT	\$ 131,79		\$ 119		\$ 103		\$ 98
Industry and Commerce	\$ 119,82		\$ 106		\$ 129		\$ 56
Property Tax	\$ 1,61		\$ 1.88		\$ 2.19		\$ 2.25
Surcharges and Other	\$ 1,28		\$ 1.34		\$ 1.40		\$ 1.45
Registration and Enrollment	\$ 0,15		\$ 0.81		\$ 0.10		\$ 0.15
C. Financial Superintendency Contribution	\$ 20,35		\$ 16		\$ 12		\$ 10
D. Deposit Insurance	\$ 140,27		\$ 141		\$ 129		\$ 114
E. Financial Transaction Tax (4*1000)	\$ 53,78		\$ 69		\$ 67		\$ 38
F. Para-fiscal and social security contributions	\$ 75,99		\$ 71		\$ 68		\$ 63
Dividends Declared in the Immediately Preceding Fiscal Year	\$ 248,82		\$ 215		\$ 251		\$ 150
Allowable accumulated adjustments	\$ -		\$ -		\$ -	0%	\$ -
Taxes / Declared Dividends	220%	-16%	262%	44%	182%	-45%	332%
Effective tax rate in %	51%	-5%	53%	3%	52%	4%	50%
Taxes paid in cash	\$1.076	3%	\$ 1.043	117%	\$ 994	49%	\$ 669
Cash tax rate (%)	99%	1%	99%	82%	112%	67%	66,89%

Source: Banco de Occidente financial statements (public information).

*Taxes paid are processed through the financial system; this item includes all tax payments made by the company.

*Financial figures in millions (MM) of COP.

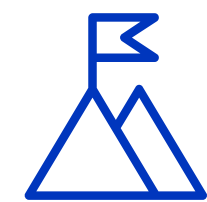


Goals, Challenges, and Opportunities in Fiscal and Tax Management

In Banco de Occidente's tax department, we work to ensure that every process—internal and external—is carried out with transparency, clarity, order, and consistency, maintaining a socially responsible approach toward our stakeholders. This approach allows us to comply in a timely manner with the requirements of regulatory authorities and, at the same time, strengthen the sustainability of our business.

Throughout 2025, we actively engaged with **stakeholders, trade unions, and associations**, driving significant progress in collaboration with regulatory bodies. This coordinated effort contributed to **greater tax efficiency** and facilitated the discussion and adoption of necessary **regulatory adjustments** to promote sound fiscal practices aligned with sustainability.

Looking ahead to 2026, our commitment is to continue complying with the **Fiscal Policy**, ensuring that our operations incorporate a comprehensive understanding of fiscal impact and continue to contribute to building a country with **sustainable fiscal policies**, generating economic, social, and environmental value.



Challenges and Management Focus Areas

- Maintain **timely and consistent compliance** with tax obligations, based on internal controls and best practices.
- Monitor **regulatory developments** and ensure their proper interpretation and application, reducing uncertainties and risks.
- Continue to strengthen **coordination with trade unions, associations, and authorities**, contributing to technical discussions that improve the fiscal framework.
- Maintain prudent **fiscal risk** management, ensuring traceability, documentation, and escalation when uncertain positions or differences in judgment arise.

Strategic Management of Financial and Non-Financial Risks

At Banco de Occidente, we understand that, in a changing environment, risk management is not merely a regulatory requirement: it is a concrete way to **safeguard the Bank's stability**, protect the interests of our stakeholders, and **ensure the continuity** of our operations.

At the macroeconomic level, we are aware that instability in the banking sector can trigger broader consequences—such as systemic economic crises that affect employment, investment, and the country's financial stability. Therefore, strengthening our comprehensive risk management is an essential pillar for acting with prudence, foresight, and responsibility.

In Colombia, the financial sector is subject to strict regulations. In line with this, we operate under the **Comprehensive Risk Management System (SIAR)** defined by the Financial Superintendency of Colombia, through which we have established guidelines and actions to manage the risks inherent in our operations, including:



Credit Risk



Market Risk



Banking Book Interest Rate Risk



Liquidity Risk



Operational Risk



Conduct Risk



Our Risk Management Cycle

To ensure that this management is consistent and effective, we have structured the SIAR into four stages that we apply comprehensively:

1. Identification

In this stage, we identify current and potential risks associated with the activities we carry out or plan to implement.

2. Control

We define mechanisms to mitigate and reduce the probability of occurrence, as well as to minimize the impact when appropriate.

3. Measurement

We assess and quantify our exposure to risks and estimate the impact they could have if they materialize. This measurement can be qualitative or quantitative, depending on the type of risk.

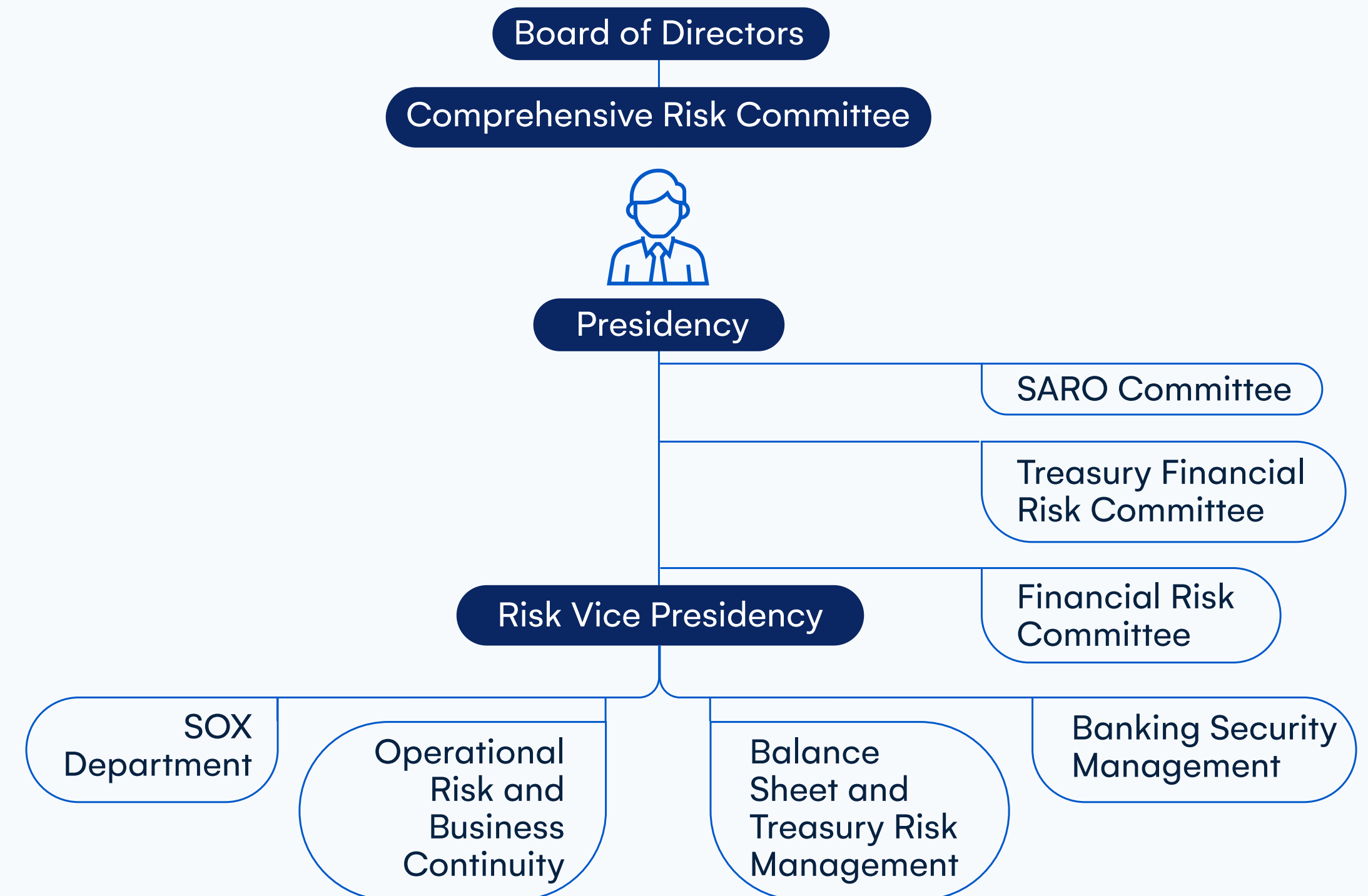
4. Monitoring

We continuously monitor risk sources, the risk profile, deviations from established limits, and the effectiveness of the controls implemented.



Risk Governance

Our comprehensive risk management is supported by a risk governance framework that enables decisions to be guided by a long-term vision, technical discipline, and accountability.



The **Board of Directors**, the **Integrated Risk Committee**, and the **President** lead and oversee risk management, supported by the **Vice President of Risk and Collections**, who coordinates a specialized team comprising four departments and one division:



Roles and Responsibilities

From the **Vice Presidency of Risk and Collections**, and in coordination with **Grupo Aval Holding**, we work to:

- Define **risk indicators, limits, and thresholds** in accordance with the organizational structure, business lines, and guidelines of our risk appetite statement, based on internal methodologies and models.
- Ensure that **risk appetite, limits, and thresholds**, as well as the associated results, are discussed and approved by specialized committees (for example: Financial Risk Committee—Corporate Banking and Retail Banking—, Treasury Financial Risk Committee, ALCO (Asset and Liability Committee), SARO Committee, and Grupo Aval Risk Committee). These elements are subsequently presented to **the Board of Directors' Comprehensive Risk Committee for consideration and approval**.

Commitment to Integrity and Prevention

Management oversight is carried out by the departments under the Vice Presidency of Risk and Collections, which report results to the various committees. In addition, the **Board of Directors' Comprehensive Risk Committee (CIR)**—chaired by an independent member—meets quarterly to oversee management, monitor the risk profile, and verify that policies and procedures are adequate.

Among its functions, the CIR also advises the Board of Directors on operations, events, or activities that may affect risk exposure and profile, approves adjustments to the SIAR, and promotes continuous monitoring of the risk culture.

- **The Compliance Officer** oversees money laundering risk and reports directly to the Chair, submitting detailed reports to the Board of Directors each quarter.
- **Audits and Independent Evaluation**

On an annual basis, **KPMG** conducts an internal audit of the management of various types of risk. In these audits, the results have generally been satisfactory; when opportunities for improvement are identified, each risk function develops action plans to address gaps, which are monitored and reported to the relevant committees. Additionally, our Holding Company has a **Corporate Comptroller's Office** that periodically evaluates risk management across the various entities.

2025 Focus on Cybersecurity and Business Continuity

Among the high-impact risks we prioritize, we highlight:

→ Information security and IT security (Cybersecurity)

Focused on preventing losses in the **integrity, reliability, availability, and security** of customer information, accounts, and cybersecurity in general. Our main mitigation actions include:

- Monitoring and management of IT security alerts.
- Defining action plans and following up on findings from vulnerability and penetration testing of systems and technology infrastructure.
- Monitoring compliance with the information security model of the Bank and its subsidiaries.
- Approval, dissemination, and verification of compliance with the information security model.
- Administration and renewal of the **Cyber Policy**.





Risk culture: Building Organizational Capabilities

In 2025, we continue to strengthen a robust risk culture, recognizing that prevention and effective management require both methodologies and ownership by individuals.

Among the initiatives we maintain and strengthen are:

- Annual dissemination of regulatory courses (SARO Course, Information Security, SARLAFT, ABAC).
- Monthly onboarding for new managers in Corporate and Personal Banking regarding credit risk.
- Technical training for risk teams (e.g., tools such as Excel, Python, and Power BI in Credit Risk Management and Balance Sheet and Treasury Risk).
- Training for third parties in Operational Risk.
- Business Continuity Plan (BCP) crisis drills.
- Training for process owners and new employees to prevent risks from materializing.



Strategic risk training for senior management

In 2025, we continue to strengthen informed decision-making through training and refresher sessions aimed at senior management and the Board of Directors. We conduct ongoing sessions on fraud prevention and training on specific topics—such as interest rate risk in the banking book—in addition to promoting the dissemination of best practices in the capital markets.

In addition, we maintain timely communication regarding recent regulations, address specific concerns with the support of the AMV, and update methodological guidelines for the mark-to-market valuation of Treasury products.

This effort is coordinated with periodic feedback sessions, where each Risk Management team reviews results, identifies opportunities for improvement, and supports the implementation of corrective measures with the teams responsible.

Strengthening Environmental and Social Risk Management

As a complement to our comprehensive management approach, and recognizing that environmental and social risks can affect both our clients and society at large, we continue to strengthen the implementation of **SARAS** (initiated in 2023 and fully implemented

in July 2024), which covers the segments and commercial divisions of Corporate Banking and reinforces our ability to manage risks associated with environmental and social impacts that may also affect our clients’ ability to make payments . For more information, please refer to the Subchapter (Environmental and Social Risk Systems—SARAS).

Business Continuity Plan (BCP)

Related to the unavailability of the Bank’s critical services and services provided by third parties due to operational or technological disruptions.



In this regard, we perform the following, among other tasks:

- Verification of the operation of the alternate data center.
- Testing the continuity plan for critical processes and testing defined contingency plans.
- Monitoring compliance with the BCP management of critical third parties.
- Reporting and monitoring of relevant BCP events to the SARO Committee.
- Reporting relevant Operational Risk and critical third-party service disruptions to the Comprehensive Risk Committee — Board of Directors.

Risks in new products: prevention from the design stage

In line with the regulations of the Colombian Financial Superintendency, we identify risks **prior to the launch of new products, services, or technologies**, as well as when entering new markets.

In this process, the risks of money laundering, terrorist financing, and the proliferation of weapons of mass destruction are integrated from the initial analysis, along with the establishment of specific controls. **The Balance Sheet and Treasury Risk Management** team actively participates in the development of new products, validating valuation methodologies and assessing the impact on risk metrics.

In this way, we seek to ensure that every new development remains aligned with our principles of prudence, control, and regulatory compliance, and with our commitment to offering responsible solutions to our clients.

Emerging Risks



SDG 9.3; 13.2

At Banco de Occidente, we monitor emerging risks using the **PESTAL** methodology, which helps us analyze the environment across six dimensions: **Political, Economic, Social, Technological, Environmental, and Legal**. Based on this analysis, we have identified that factors such as **Climate change and Artificial Intelligence**, along with **new technologies that can be used in criminal activities**, could have significant impacts—both in Colombia and globally—on the local economy and on our clients over a **3- to 5-year** horizon.





Emerging Risk	Category	Potential Impact	Mitigation Actions	Related governance
Geopolitical tensions The rise in global and regional geopolitical tensions has created an environment of high economic and financial uncertainty, characterized by more volatile international relations, economic sanctions, and trade restrictions. This context may affect macroeconomic stability and the payment capacity of the Bank's clients.	Geopolitical	Potential impacts on the business Market risk: increased volatility in interest rates, exchange rates, and asset prices. Liquidity risk: potential restrictions on international capital flows and increased regulatory pressure. Credit risk: deterioration in repayment capacity and an increase in delinquency rates. Operational risk: disruptions in international payment channels and increased exposure to cyber incidents. Reputational risk: increased regulatory scrutiny and exposure to sanctions.	As a bank, we continuously develop policies, limits, and indicators to measure exposure to various risks. These parameters are continually adjusted in line with market conditions to anticipate and prevent situations arising from geopolitical tensions that could impact the bank's results. Additionally, we constantly monitor and track portfolio performance, identifying the economic sectors, types of companies, and customer profiles most affected. This information is used to propose adjustments to lending policies and strengthen portfolio normalization strategies for customers already experiencing adverse effects. This monitoring is complemented by periodic reviews in various senior management committees, where the bank's current situation is analyzed and timely decisions are made to mitigate the potential effects of this risk.	Financial Risk Committee — Treasury Risk. Financial Risk Committee — Corporate Banking Credit Risk. Financial Risk Committee — Retail Banking Credit Risk. ALCO Committee Finance Committee. SARO Committee.
Artificial Intelligence and New Technologies for Criminal Purposes The misuse of artificial intelligence and emerging technologies can increase the Bank's exposure to digital fraud, identity theft, information theft, and sophisticated cyberattacks, affecting information security and business continuity.	Technological	Currently, this risk has a significant impact on our sector, exposing us to critical impacts such as information theft through applications, loss of resources due to identity theft, extraction of confidential data using emerging technologies installed on frequently used devices, as well as information hijacking and extortion for its recovery. These situations can result in fraud, loss of customer data, and sensitive bank information, which increases the likelihood of reputational risk due to the impact on service continuity and quality.	The Bank is moving forward with the implementation of communication strategies for customers and employees, aimed at reinforcing preventive measures and authenticity verification against potential requests generated by artificial intelligence. Additionally, we are strengthening authentication protocols across the Bank's channels and services. To mitigate the risks associated with the use of new technologies for criminal purposes, we have incorporated malware protection solutions for business clients and developed digital risk awareness initiatives aimed at clients and employees. We have also strengthened our cybersecurity tools to prevent unauthorized access and potential impersonation attempts.	Additionally, the Artificial Intelligence Committee was created, tasked with monitoring emerging risks and promoting timely actions for their mitigation.



Credit Risk

Nature of the risk

As of **December 31, 2025**, our total loan portfolio stood at **\$51,12 billion**, representing annual growth of **4,34%**. This portfolio was broken down as follows: 67,17% commercial loans, **25,33%** consumer and retail loans, and **7,50%** housing loans. Compared to **December 2024**, the commercial portfolio grew by **3,62%**, the consumer portfolio by **0,99%**, and the housing portfolio by **26,36%**.

In the **commercial portfolio**, the breakdown by product was: **71,21%** ordinary loans, **19,14%** leasing, **6,69%** treasury, **2,67%** factoring, and **0,29%** credit cards. In the **consumer portfolio**, **payroll loans** accounted for the largest share (**42,15%**), followed by **unsecured loans (25,74%)**, **auto loans (19,88%)**, **credit cards (11,97%)**, and **revolving credit (0,26%)**.

We serve commercial clients across various economic activities, grouped into **18 sectors**. The most significant sectors were: manufacturing with **15,38% (\$5.282.664 million)**, **financial and insurance activities with 13,34% (\$4.580.681 million)**, **wholesale trade with 9,89% (\$3.395.962 million)** and **retail trade with 7,76% (\$2.664.831 million)**. The remaining **53,63%** was concentrated in other activities. During 2025, the growth of the commercial portfolio was driven, in part, by increased exposures to clients such as the **Bogotá Mayor's Office**, the **APP GICA Autonomous Fund**, the **Universidad Nacional Abierta y a Distancia**, and the **Special District of Science, Technology, and Innovation**, among others.

Portfolio Quality and Market Position

In the **commercial portfolio**, we ranked **fifth** in the system, with a market share of **9,01%** as of November 2025. The **Non-Performing Loan Ratio (NPL Ratio)** stood at **3,14%** as of November 2025, unchanged from the level in November 2024. Compared to the major banks, we maintain the **second-best commercial NPL Ratio, 20 basis points** below the banking system's NPL Ratio (**3,34%**).

In the **consumer loan portfolio**, we ranked sixth in terms of outstanding balance, with a **6,45%** share of the total system. The non-performing loan portfolio increased by **0,40%**; however, most product categories saw declines, with credit cards (**-34,73%**) and unsecured loans (**-24,76%**) posting the largest decreases. The consumer **ICV** maintained a downward trend throughout 2025 and closed at **3,97%**, a decrease of **0,02%** compared to the end of 2024 (**3,99%**).

In the **housing portfolio**, the non-performing portfolio increased by **24,19%** compared to 2024. However, the **ICV** decreased by **0,08%** and closed at **4,83%**. During 2025, inflation and unemployment continued to fall and GDP grew, which strengthened repayment capacity.

Overseas Subsidiaries: Portfolio Performance

Among our international subsidiaries, as of **December 2025**, **Banco de Occidente Panamá** reported a loan portfolio of **US\$523.318.550**. **99,97%** of which was

in the commercial portfolio. Its non-performing loan ratio stood at **0,43%**, the at-risk loan ratio at **1,94%**, and the loan loss coverage ratio at **1,05%**, indicating stable portfolio indicators at the end of 2025.

Meanwhile, **Occidental Bank Barbados** closed December 2025 with a portfolio of **US\$198.800.333**, 100% of which was in the commercial portfolio. The non-performing portfolio stood at **1,41%**, the portfolio at risk at **2,00%**, and the provision coverage ratio at **0,96%**. Overall, we observed **strong performance** in portfolio quality indicators across our subsidiaries.

Assessment and Measurement

To extend credit responsibly, we use various **internal risk measurement models** that help us make consistent decisions, classify our customers, and monitor portfolio performance in a timely manner.

In the **consumer loan portfolio**, we use **scoring models** that, starting with the initial assessment, assign a score to the customer based on **credit bureau variables and industry-specific behavior**. We use this score to verify whether the applicant meets the **Bank's policies**, including the **minimum required score**. In addition, we have **monitoring models** that rely primarily on **payment behavior variables and product usage**, which allow us to rate customers and estimate the **probability of default over the next 12 months**.



In the **commercial portfolio**, we use **rating models** built primarily on **financial indicators** derived from **clients' financial statements**. These variables generate the input models, and for the monitoring models, we also incorporate **payment behavior variables**. This approach applies to the **industry, commerce, services, construction, local government, and financial institutions** segments, with input and monitoring models designed for each.

These models serve as a cross-functional tool within our management framework. We use them, among other purposes, for: **credit approval, customer classification, determining recommended loan amounts, structuring commercial lending programs, follow-up, portfolio rating, estimating loan loss reserves, and monitoring the portfolio's composition by risk level**.

In terms of control and monitoring, we conduct periodic reviews that allow us to keep management under control:

- In the **commercial portfolio**, we monitor **exposure limits by economic sector on a monthly basis**; and as of the December 2025 cutoff, 100% of the sectors were **within the established risk appetite**.
- In **consumer and housing portfolios**, we conduct **monthly monitoring** such as **Through The Door** (monitoring of scoring policies by product), **analysis of disbursements** by different variables, and **payroll deduction diagnostics**, where we review the evolution of **collections** and, when necessary, make **policy adjustments** to improve portfolio performance.

Management, Monitoring, and Mitigation

To ensure that our models remain useful and reliable over time, the **credit risk models** applied to the **commercial and consumer portfolios are monitored semi-annually (June and December)**. In this exercise, we evaluate their ability to distinguish between customers with good and poor payment behavior through **backtesting, using the Accuracy—Ratio (AR)** as a measure of fit. If the **AR is equal to or greater than 50%**, the model remains in production; when the **AR is less than 50%**, a **new model is estimated**.

In addition to technical monitoring, we complement our management with specific analyses that allow us to anticipate changes in the environment and adjust policies when necessary. During **2025**, for example, we assessed the **impact of foreign exchange risk** on clients in the commercial portfolio and concluded that clients with a **focus on imports** continue to perform well. Along the same lines, the foreign currency portfolio maintained **healthy levels of past-due and at-risk balances**, even though the total balance of this portfolio showed a **downward trend** over the year.

We also analyzed the **potential impact of the tariff increases imposed by the United States**, as well as the impact on sectors exposed to developments such as **government reforms and fluctuations in input prices**. These analyses allowed us to identify **exposure by sector, the number of clients involved**, and possible effects on portfolio dynamics. Based on the results, we concluded that exposure to clients and sectors with potential impacts is **low and/or under**

control. Nevertheless, as a preventive measure, we implemented a **policy of short maturities** for the debt levels assigned to **corporate clients** in sectors considered vulnerable (**no longer than 6 months**), **to monitor financial statements** and anticipate any deterioration that could affect the fulfillment of obligations.

In the **consumer loan portfolio**, we monitored **lending policies** based on **credit scores, borrower profiles, and risk factors** for each product throughout the year. These policies yielded **satisfactory results for the 2023 and 2024** loan cycles, reflecting a **decrease in the non-performing loan portfolio** and the non-performing loan ratio compared to the previous year, and an even greater decrease compared to 2023.

Regarding policy adjustments, for **payroll loans** we implemented **more restrictive guidelines by payroll provider** to strengthen risk control. In contrast, for credit cards, we moved toward more flexible policies, with adjustments to the product with a guarantee fund and to **cutoff points**, among other changes. Additionally, on the campaign front, we launched initiatives that strengthened the consumer portfolio and contributed to a **28% growth in disbursements**, relying on **segmented, high-impact** campaigns that increased commercial effectiveness.

Together, these actions enabled us to manage lending policies more **timely and efficiently**, **manage origination campaigns** more effectively, and **adequately monitor** portfolio performance.





Country Risk Management

During 2025, we continued to apply the **impairment adjustment model to our foreign equity investments**. At the Bank, we define these investments as the equity value reported in the financial statements of **Banco de Occidente (Panamá) S.A. and Occidental Bank Barbados Ltd.** In turn, this equity is supported by **loans granted by the subsidiaries in various countries**—primarily in **Central and South America**—and by their **portfolio of short- and long-term investments**.

To assess this risk, we conduct an **annual country risk** study that incorporates **economic, social, political, and market** variables, and uses them to assign a rating to **Panama and Barbados**. As part of this exercise, we take into account that a significant portion of the exposure associated with these investments is located **outside those two countries**; therefore, we adjust the final rating using the **weighted average** of the countries where the exposure is actually located.

As a result of the analysis, **Panama** was classified in **Category B** within the **SIAR country risk** framework. In this case, the rating remains at its original level, and **no further analysis was necessary**; therefore, **no impairment adjustment is required**. In the case of Barbados, the weighted average of the countries where the exposure is concentrated allowed its rating to **improve to B**, reaching its **highest classification**.

During 2025, we strengthened the **implementation of the TCFD** through a structured approach focused

on governance, internal capabilities, and climate risk management. Multiple training sessions were conducted for key areas, aimed at strengthening the technical understanding of climate risk and its financial impact, which allowed for better adoption of the TCFD framework and its integration into risk management and decision-making processes.

Additionally, with Deloitte's support, the Bank developed and received a specialized tool for climate risk analysis, which will serve as the basis for the systematic assessment of physical and transition risks. This tool will enable progress toward more consistent and comparable analyses, facilitating the identification of potential financial impacts and consolidating the climate risk measurement and management process in 2026.

In 2025, the environmental and social risk management process was consolidated, improvements were made to the categorization form, and the visibility of relevant aspects—such as the final categorization result—was enhanced. Additionally, the process was successfully integrated into the credit workflow, which improved the timeliness and quality of information for reporting and monitoring operations.





Operational Risk

In accordance with the provisions of **Chapter XXXI of the Basic Accounting and Financial Circular** (Parts II and III, on Operational Risk Management), the Bank manages operational and business continuity risk through a continuous cycle of **identification, measurement, control, and monitoring**.

In practice, this involves continuously updating **risks and controls** within processes, tracking the **risk profile**, and monitoring the **event log** to identify corrective actions that help prevent events from occurring and **reduce our exposure**. This approach is particularly important because operational risk is a key component in the calculation of the **solvency ratio**.

As of December 31, 2025, the Operational Risk Management System consolidated the following indicators:

Concepto	Total
Processes	139
Risks	711
Failures	1.075
Controls	2.252

Operational Risk Profile

As of December 2025, our **residual risk profile** remains at a **low level**: **75%** of the **711 risks** fall into the **low–exposure** quadrant.

For this assessment, we considered, among other factors, the following elements:

- **Inherent and residual risk** ratings.
- **Effectiveness** of controls.
- Changes in personnel associated with **Risk Managers**.
- Updates to **applications and procedures**.
- Adjustments to processes documented by **Process Management**.

Operational risk losses

In 2025, net losses associated with operational risk events totaled \$7.562 billion, resulting from:

- **Gross losses**: \$17.046 MM.
 - **Recoveriess**: \$9.484 MM.
- According to the **Basel II** classification, losses were concentrated primarily in:
- **Process execution and administration**: 80% (\$6.016 billion).
 - **Internal fraud**: 27% (\$2.085 billion).
 - **Other categories**: 5% (\$374 million).

Additionally, **recoveries from external fraud** totaled **\$9.182 billion**, resulting in a **net loss of –\$913 million** (equivalent to **–12%**), reflecting the effectiveness of recovery mechanisms, primarily through the **insurer**.

→ Reports to Senior Management

On a **monthly and quarterly** basis, we present information to the **SARO Committee** and the **Board of Directors’ Comprehensive Risk Committee**, including:

- Follow-up on corrective actions for high and extreme risks
- Trends in operational risk losses
- Analysis of materialized events
- Updates to the risk profile
- Changes in processes, risks, and controls

In addition, we continuously monitor the submission of **regulatory reports** by each area of the Bank to ensure **regulatory compliance**.





Business Continuity Plan

In line with the definition provided by the Colombian Financial Superintendency (SFC) and as an integral part of our **operational risk management**, the **Business Continuity Plan (BCP)** brings together the procedures, resources, and systems we need to **maintain operations** when disruptions occur and ensure the continuity of services.

Throughout 2025, we continued to strengthen this plan through concrete actions that help us stay prepared and respond in a timely manner:

- Ongoing updates to the **continuity model**.
- Review and adjustment of **continuity strategies**.
- Conducting **process tests**.
- Updating the **BIA (Business Impact Analysis)**.
- Updating the **call tree** for activations and escalation.
- Monitoring compliance with **SLAs** for critical third parties.



Implementation of the Full VPN scheme

In 2025, we completed the first phase of the **Full VPN-based** contingency project, migrating **34% of the applicable strategies**. This scheme allows our employees' homes to function as **alternate centers** in contingency scenarios, strengthening our response capacity and operational continuity in the face of disruptive events.

Technology management for continuity

Complementarily, during 2025 we carried out activities on the **technology infrastructure** that supports critical applications, facilitating operations from the **Alternate Data Center (CCA)** when necessary. This allows us to maintain the availability of essential services and ensure that operations can be sustained even in contingency scenarios.

Monitoring of Critical Third Parties

In compliance with **External Circular 042 of 2012**, we continuously monitor the **continuity plans** of critical suppliers. This work was further strengthened through coordination with **Asobancaria**, which allows us to maintain a coordinated approach regarding industry standards, expectations, and best practices.





Conduct Risk

In 2025, we advanced in consolidating our **Conduct Risk Management System**, in line with the **External Guide for the Supervision of Conduct Risk** issued by the Financial Superintendency of Colombia on **September 24, 2024**. For us, this work is key because it helps us **protect the rights of financial consumers** and strengthen, day by day, **confidence** in the financial system.

We understand conduct risk as the potential for negative impacts on consumers or the market arising from practices carried out by supervised entities. For this reason, we have been developing a management framework that integrates **guidelines, protocols, and tools** to promote actions that are ethical, transparent, and consistent with our customers' expectations, with the aim of offering **responsible products and services**.

Since 2024, we have been driving the implementation of this system and keeping the **Board of Directors** informed of its progress, challenges, and results. To identify conduct risks, we conducted an analysis based on our **operational risk matrix** and a detailed review of the processes that make up the product and service **lifecycle**. In addition, we incorporated the pillars of the **Customer Service System (SAC)** defined in **Law 1328 of 2009**, the nature of **complaints** received during the past year, and the categorization of risk factors established in the Superintendency's guidelines.

As a result, we adjusted the institutional risk inventory, which now consists of **17 behavioral risks and 238 associated controls**. In turn, during 2025, we began

a **refinement and prioritization** exercise to make management more effective and focus specifically on the risks with the greatest relevance or potential impact on our customers.

Complementarily, we continue to promote a **customer-centric organizational culture**, supported by ongoing training programs for all employees. Through these initiatives, we aim to strengthen prevention, promote appropriate conduct, and continue to build relationships based on trust.

Liquidity Risk

Liquidity risk refers to the possibility that Group entities may not, at any given time, have the necessary resources to **meet their obligations** to clients and financial market counterparties in a **timely manner**, in any currency and location. Therefore, each entity reviews its resource availability **daily** to ensure the continuity and stability of operations.

At the Bank, we manage this risk under the standard model defined in **Chapter XXXI (Appendices 9 and 12) of the Basic Accounting and Financial Circular** issued by the Financial Superintendency of Colombia, and in accordance with the principles of the **Comprehensive Risk Management System (SIAR)**. This framework establishes the minimum prudential parameters that guide liquidity risk management and allows us to maintain consistent and disciplined management.

To measure liquidity risk, we calculate the **Liquidity Risk Indicator (IRL) weekly for 7-, 15-, 30-, and 90-day horizons**, in accordance with the Financial

Superintendency's methodology. Additionally, we evaluate this indicator **quarterly** for the subsidiaries to monitor the conglomerate's liquidity risk.

Complementarily, we measure the stability of funding relative to the asset composition and off-balance-sheet positions on a monthly basis, with a one-year horizon, using the **Net Stable Funding Ratio (NSFR)**, also under the Superintendency's standard model.

Our daily monitoring is not limited to compliance with reserve requirements: we seek to anticipate changes in the liquidity risk profile and make timely decisions. To this end, we rely on **early warning indicators** that allow us to identify our current scenario and define the strategies to follow. These indicators include,





for example, the level of high-quality liquid assets, deposit concentration, and the utilization of **liquidity quotas from the Central Bank, among others.**

The liquidity situation and related decisions are reviewed and managed by governance bodies such as the technical asset and liability committees (**Finance Committee and ALCO**) and the **Comprehensive Risk Committee**, together with the full Board of Directors. In these forums, senior management analyzes and defines aspects such as: the levels of high-quality liquid assets to be maintained, the minimum liquidity tolerance, funding and deposit-taking strategies, policies for managing excess liquidity, adjustments to existing and new products and new developments, the diversification of funding sources to avoid concentrations, hedging strategies, and changes in the balance sheet structure.

During 2025, the Bank maintained a sufficient level of liquid assets to meet short-term liquidity requirements. Under the Financial Superintendency's

methodology, **liquid assets and 30-day liquidity requirements** averaged **\$9,8 billion and \$7,1 billion**, respectively, resulting in a ratio of **138,4%**. This level remained comfortably above the Bank's defined risk appetite threshold (**minimum 120,0%**) and well above the legal threshold (**minimum 100,0%**). In ALM management, ongoing monitoring of early warning indicators was a key focus; these indicators generally remained stable and within established limits.

At the end of this section, a summary table of projected available liquid assets as of **December 31, 2025, and 2024** is presented:

Regarding **structural liquidity**, which we measure using the **Net Stable Funding Ratio (NSFR)**, the Bank maintained a solid and stable position throughout 2025. On an annual average, available funding stood at **105,76%** relative to required funding, reflecting a consistent funding base to support our asset composition.

December 31, 2025				
Net available balances thereafter				
Entity	Liquid assets available at the end of the period (1)	From 1 to 7 days (2)	From 1 to 30 days thereafter (2)	From 31 to 90 days thereafter (2)
Head Office	9.902.548	6.121.609	3.375.436	(10.716.988)
Occidental Bank Barbados Ltd.	345.845	307.161	208.037	(177.179)
Banco de Occidente Panamá S.A.	1.261.392	1.225.946	1.098.199	(1995.340)
Fiduciaria de Occidente S.A.	-	-	-	-
TOTAL	11.509.695	7.654.716	4.681.592	(10.698.827)

December 31, 2024				
Net available balances thereafter				
Entity	Liquid assets available at the end of the period (1)	From 1 to 7 days (2)	From 1 to 30 days thereafter (2)	From 31 to 90 days thereafter (2)
Head Office	7.686.166	5.028.387	1.814.0998	(10.488.445)
Occidental Bank Barbados Ltd.	446.022	388.471	231.305	(428.112)
Banco de Occidente Panamá S.A.	1.152.428	1.044.779	900.821	(282.705)
Fiduciaria de Occidente S.A.	-	-	-	-
TOTAL	9.284.616	6.461.637	2.946.224	(11.199.262)



As of **December 31, 2025**, the **CFEN reached 107,93%**, demonstrating relative stability between assets and liabilities and a funding structure aligned with balance sheet needs.

The following table presents the **CFEN results for the Group as of December 31, 2025, and 2024**, in accordance with the guidelines established by the **Colombian Financial Superintendency** for this indicator:

December 31, 2025			
Entity	Available Stable Funding (ASF)	Required Stable Funding (RSF)	Net Stable Funding Ratio (NSFR)
Banco de Occidente	42.520.162	39.397.293	107,93%

December 31, 2024			
Entity	Available Stable Funding (ASF)	Required Stable Funding (RSF)	Net Stable Funding Ratio (NSFR)
Banco de Occidente	39.337.640	37.245.588	105,62%

Market Risk

We participate in the **money, foreign exchange, and capital** markets to meet our needs and those of our customers, always in accordance with **internal policies** and defined risk levels. To this end, we manage various portfolios of financial assets, ensuring that each decision remains within approved limits and with continuous monitoring of exposure.

As of **December 31, 2025 and 2024**, the Parent Company and its subsidiaries held **financial assets and liabilities subject to market risk**, in accordance with the composition of their portfolios and prevailing market conditions.

	December 31, 2025	December 31, 2024
Assets		
Financial assets at fair value through profit or loss		
Investments in debt securities	11.820.386	8.299.454
Trading derivative instruments	1.524.973	499.708
Hedging derivative instruments	48.261	–
Subtotal	13.393.620	8.790.162
Equity instruments at fair value through OCI (Other Comprehensive Income)		
Investments in debt securities	6.674.681	5.721.126
Subtotal	6.674.681	5.721.126
Financial assets at amortized cost		
Investments in debt securities	1.324.900	2.133.673
Subtotal	1.324.900	2.133.673
Total assets	21.303.201	16.644.961
Liabilities		
Trading derivative instruments	1.285.816	532.715
Hedging derivative instruments	1.285.816	532.715
Total liabilities	22.679.017	17.177.676



The most significant exposure within market risk management was concentrated in the **Parent Company’s fixed-income portfolio**, which averaged **\$14.48 billion** in 2025, with an **average duration of 45 months** and a **35% concentration in the medium term** (more than 2 and less than 5 years). This level was higher than that observed in 2024, primarily due to the dynamics of the **market maker** scheme. It is important to note that this portfolio remained **hedged through securities derivatives (sales) and short sales**, which allowed for the mitigation and control of risk.

Additionally, as of **March 31, 2025**, the entire **ALM Available-for-Sale** investment portfolio (**Banking Book**) was excluded from market risk exposure under **Regulatory Value at Risk (VaR)**, pursuant to a corporate decision approved by **ALCO and the Treasury Financial Risk Committee**.

As a result of the above, the **SFC regulatory VaR** showed lower exposure: the annual average was **\$208.939 million**, and as of December 31, 2025, it stood at **\$109.891 million**. In any case, the **Value at Risk** results remained **within the risk appetite limits** defined in relation to technical reserves (**annual average: 3,52%** versus a **maximum allowed of 5,50%**).

Entity	December 31, 2025	December 31, 2024
Headquarters	\$ 109.891	339.369
Occidental Bank Barbados Ltd.	8.442	10.569
Banco de Occidente Panamá S.A	29.986	25.757
Fiduciaria de Occidente S.A.	4.196	6.277
	152.515	381.972

In accordance with the standard model, the **consolidated VaR as of December 31, 2025, and 2024** is presented in the corresponding table, along with the summary of VaR indicators for the Parent Company and subsidiaries:

The **VaR indicators** reported by the Parent Company and subsidiaries for the years ended December 31, 2025, and 2024 are summarized below:

December 31, 2025 (\$)				
	Minimum	Average	Maximum	Last
Interest rate	\$ 148.047	189.910	238.845	148.047
Exchange rate	837	7.838	16.567	3.273
Equities	-	-	-	-
Collective portfolios	1.195	1.344	1.441	1.195
Credit Default Swaps (CDS)	-	-	-	-
Portfolio VaR				152.515

December 31, 2024 (\$)				
	Minimum	Average	Maximum	Last
Interest rate	\$ 264.941	322.068	379.009	379.009
Exchange rate	1.078	3.402	9.151	1.971
Equities	-	-	-	-
Collective portfolios	934	991	1.031	992
Credit Default Swaps (CDS)	-	-	-	-
Portfolio VaR				381.972

As part of our management, we perform **sensitivity analyses** of the investment portfolios to changes in interest rates (measured in basis points) in order to anticipate potential impacts and adjust the strategy when appropriate.

December 31, 2025					
	Portfolio Value (\$)	25 PB	50 PB	75 PB	100 PB
Fair Value Headquarters	16.664.660	(121.180)	(240.560)	(358.167)	(473.999)
Fair Value Occidental Bank Barbados Ltd.	380.210	(2.953)	(5.860)	(8.724)	(11.544)
Fair Value Banco de Occidente Panama S.A.	1.401.364	(10.151)	(20.167)	(30.050)	(39.804)
Fair Value Fiduciaria de Occidente S.A.	48.833	(465)	(929)	(1.394)	(1.859)
Total	18.495.067	(134.749)	(267.516)	(398.335)	(527.206)

December 31, 2024					
	Portfolio Value (\$)	25 PB	50 PB	75 PB	100 PB
Fair Value Headquarters	12.182.236	(101.064)	(200.492)	(298.290)	(394.560)
Fair Value Occidental Bank Barbados Ltd.	470.988	(3.629)	(7.205)	(10.727)	(14.198)
Fair Value Banco de Occidente Panama S.A.	1.287.902	(8.590)	(17.059)	(25.409)	(33.642)
Fair Value Fiduciaria de Occidente S.A.	79.455	(732)	(1.463)	(2.195)	(2.927)
Total	14.020.581	(114.015)	(226.219)	(336.621)	(445.327)

The sensitivity results as of December 31, 2025, and 2024 are presented in the table above:

Qualitative Analysis of Market Risk

We participate in the money, foreign exchange, and capital markets to meet our needs and those of our clients, always in accordance with internal policies and defined risk levels. Within this framework, we manage various financial asset portfolios within permitted limits and exposure levels.

Market risk arises from our open positions in investment portfolios of debt securities and derivative instruments, due to adverse movements in factors such as interest rates, inflation, exchange rates, and their volatility, as well as changes in the liquidity of the markets in which we operate.

- When trading financial instruments, we pursue several objectives, including:
- ✓ **Offering products tailored to our clients’ needs**, including solutions that serve as hedges against their financial risks.
 - ✓ **Structuring portfolios to take advantage of arbitrage opportunities** across yield curves, assets, and markets, seeking returns with an appropriate level of capital consumption.
 - ✓ **Conducting derivative transactions** for the purpose of intermediation with clients or to capitalize on arbitrage opportunities, both in exchange rates and interest rates, in local and foreign markets.





In conducting these transactions, we assume risks within defined limits and, when appropriate, mitigate them through the use of other derivative financial instruments.

Senior management and the Board of Directors actively participate in risk management and control through a reporting protocol and the leadership of various committees that conduct comprehensive monitoring—both technical and fundamental—of the variables influencing markets internally and externally, to support strategic decision-making.

Complementarily, the ongoing analysis and monitoring of risks associated with our operations is key to making timely decisions and evaluating results. Along the same lines, continuous monitoring of the macroeconomic environment helps us seek an appropriate balance between risk, return, and liquidity.

The risks assumed are managed through a limit structure for positions in different instruments, defined by considering each portfolio’s specific strategy, the depth of the markets in which we operate, the impact on risk-weighted assets and the level of solvency, as well as the balance sheet structure. These limits are monitored on an ongoing basis and reported **daily** to senior management, **biweekly** to the Finance Committee, **monthly** to the Risk Committee, and **quarterly** to the Board of Directors.

To quantify market risk, we use **value-at-risk models (internal and standard)**. The Boards of Directors approve a limit structure based on the value-at-risk associated with the annual profit budget and establish additional limits by risk type.

We use the **standard model** to measure, control, and manage market risk related to interest rates and exchange rates, both in the treasury book and the banking book. These measurements are performed **daily** for the parent company and **monthly** for each of its subsidiaries, to measure and monitor risk at the conglomerate level.

Currently, we map the asset and liability positions of the treasury book into zones and bands based on portfolio duration, investments in collective portfolios, and the net foreign currency position (assets minus liabilities) for both the banking book and the treasury book, in line with the standard model recommended by the Basel Committee.

Additionally, we have internal parametric management models based on the **Value at Risk (VaR)** methodology, which complement our management by identifying and analyzing variations in risk factors (interest rates, exchange rates, and price indices) on the value of the instruments comprising the portfolios. These models correspond to **JP Morgan’s RiskMetrics** methodology.

VaR measurement methodologies are periodically evaluated and subjected to performance tests to verify their effectiveness. Furthermore, we have tools to conduct **stress and/or sensitivity tests** on the portfolios, based on the simulation of extreme scenarios.



Interest Rate Risk 2025 — Banking Book

Banking book interest rate risk is defined as the “current or prospective risk to the entity’s capital and earnings arising from adverse movements in interest rates that affect banking book positions.” In turn, Banking Book Credit Spread Risk (RSCLB) corresponds to “any type of credit spread and liquidity spread risk not accounted for by RTILB or by credit risk.” In line with our policies, we define this risk as applying only to banking book positions that do not consume capital due to market risk, and it includes asset, liability, and off–balance–sheet items that present this exposure.

In this context, we are exposed to fluctuations in interest rates that may impact future cash flows. This risk may arise from mismatches in the repricing timing between assets, liabilities, and off–balance–sheet positions; from the use of different rate reference points (, DTF, SOFR, fixed rates, among others); and from optional features that may alter cash flows in both asset and liability positions (for example, prepayments). As a result of changes in rates, interest margins may increase or decrease, which in turn may impact the institution’s results. To manage this exposure, we employ mechanisms such as hedging using derivative instruments, aimed at mitigating interest rate risks in the banking book.

We manage Banking Book Interest Rate Risk (RTILB) in accordance with the standard model established in Chapter XXXI (Annex 15) of the Basic Accounting and Financial Circular of the Financial Superintendency of Colombia, which defines the minimum prudential parameters that institutions must monitor to efficiently manage this risk.

To measure RTILB, we calculate two indicators:

- ✓ **ΔVEP (sensitivity of the economic value of equity):** estimated under six shock scenarios (parallel shift up, parallel shift down, flattening, steepening, short–term rise, and short–term fall).
- ✓ **ΔMNI (sensitivity of the net interest margin):** calculated under two shock scenarios (parallel shift up and parallel shift down), according to the SFC’s standard model.

ΔMNI takes a short–term approach, as it measures the impact of the shock over a one–year horizon and under the assumption of a constant balance sheet, i.e., without growth or decline in positions. This metric captures the effect on the net interest margin in the face of a parallel shock of **+/- 400 bps**. Additionally, we calculate the sensitivity for a parallel shock of **+/- 100 bps**.

For its part, **ΔVEP** has a long–term focus and is estimated under the assumption of a balance sheet in liquidation; that is, the entire horizon is evaluated up to the final maturity of the balance sheet positions. This metric reflects, under different scenarios, the change in the present value of interest–rate–sensitive assets and liabilities and, therefore, their final effect on the economic value of equity.

In accordance with the regulatory framework, the SFC requires that the maximum value of **ΔVEP** across the six scenarios remain below **15%** of the sum of Common Equity Tier 1 (CET1) and Additional Tier 1 (AT1) capital. Accordingly, we monitor compliance with this indicator and maintain a risk appetite statement, which we review on a monthly basis.

Below, we present the results of the sensitivity analysis for **VEP** and **MNI** as of **December 31, 2025**, which show that we are within the risk appetite limit defined by the Bank (**<13,00%** according to internal thresholds) and have a margin relative to the regulatory limit (**15,00%**).

Interest Rate Risk in the Banking Book	
Figures in millions of pesos	
	December 31, 2025
1. Change in Net Interest Margin (NIM)	
1.1 Parallel upward shock	\$ 679.009
1.2 Parallel downward shock	\$ -538.475
2. Change in Net Interest Margin (NIM) Parallel 100 bps	
2.1 Parallel upward shock +100 bps	\$ 280.888
2.2 Parallel downward shock -100 bps	\$ -242.986
2. Change in Economic Value of Equity (EVE) + KAO	
2.1 Parallel upward shock	\$ 569.720
2.2 Parallel downward shock	\$ -48.155
2.3 Steepening shock	\$ -158.525
2.4 Flattening shock	\$ 370.972
2.5 Short–term upward shock	\$ 435.506
2.6 Short–term downward shock	\$ -112.623
2.7 Maximum ΔEVE (Base—Adverse) + KAO / PBA+PBO	\$ 12,05%
3. Change in Economic Value of Equity (EVE) + KAO Parallel 100 bps	
3.1 Parallel upward shock	\$ 210.271
3.2 Parallel downward shock	\$ 46.955
4. PBO + PBA	
4.1 Common Equity Tier 1 (CET1)	\$ 4.728.823
4.2 Additional Tier 1 Capital (AT1)	\$ 0.00



These results are supported by the fact that the Bank’s cumulative repricing gap does not present a significant mismatch and, therefore, the banking book interest rate risk exposure (RTILB) is not significant when evaluated from the perspective of sensitivity to economic value of equity (Δ VEP). When the duration of assets and liabilities is similar, changes in interest rates affect both balance sheet positions in similar proportions. In practice, this allows us to conclude that maintaining a repricing structure with a relatively narrow mismatch helps protect the value of the Bank’s equity.

Metric	Currency	Scenario	Value (Δ)
RSCLB	COP (Co-lombian Peso)	Rate Increase	-103.619

Figures in millions of pesos

Additionally, we report the results obtained for the RSCLB during the same evaluation period. Based on historical data and under a scenario of rising interest rates, the Entity—for a three-month period—has a probability of loss of **\$103.619 million**, associated with investments classified as available-for-sale that are not pledged as collateral in a central counterparty risk chamber or in the conduct of money market operations (repos, simultaneous transactions, or temporary transfers of securities).

The management of the RTILB, incorporating credit spread risk and liquidity spread risk (RSCLB), is the responsibility of the ALM Department and the Balance Sheet and Treasury Risk Department. In turn, through the ALCO Committee, we define strategies that involve the Financial Planning area and the commercial areas, which allows to advance the Bank’s objectives and keep the RTILB within the defined risk appetite.





Stress tests

| SASB FN-CB-550a.2 |

For the 2025 stress tests, conducted in accordance with **Circular Letter 018 of 2025**, we defined **five scenarios: a Base scenario, two Adverse scenarios** (one general and one involving **uncertainty in trade relations**), and **two Adverse scenarios with Mitigants**.

- The **Base scenario** represents a context without unexpected shocks to the economy and the banking system.
- The **Adverse scenario** incorporates severe shocks with an impact on economic activity, the banking system, and solvency and liquidity indicators, and includes a **cybersecurity event** that increases the institution's operational risk.
- The **Adverse scenario with uncertainty in trade relations** considers geopolitical tensions and reduced access to global markets.
- The **Adverse Scenarios with Mitigants** maintain the assumptions of the adverse scenarios but incorporate actions by the Bank aimed at strengthening **solvency and liquidity** beyond the limits of internal risk appetite, as appropriate.

It is important to note that the adverse scenarios are **hypothetical**: they are constructed to model impacts on **solvency** indicators and the **Net Stable**



Funding Ratio (NSFR), and **do not** constitute an expectation for the medium or long term.

The exercise was conducted using balance sheet figures as of **December 2024** and projected for the years **2025, 2026, and 2027**. Additionally, we incorporated **25 macroeconomic variables** for each scenario, which serve as inputs for the exercise and are presented in subsequent sections.

Capital Adequacy Results

In the **Base scenario**, the Bank meets the minimum requirements for **Basic Solvency, Additional Basic Solvency, and Total Solvency** under **Basel III** throughout the entire horizon. In the Adverse scenarios, the simulated shocks strain the indicators

and push **total solvency** below the internal risk appetite limits, as provided for in Circular Letter 018 of 2025. However, even under severe assumptions, **Basic Solvency and Total Solvency** remain above regulatory minimums, reflecting the Bank's capital strength. The application of mitigants in the Adverse and **Adverse with uncertainty in commercial relationships** scenarios allows the indicator levels to be restored above internal risk appetite limits.

Liquidity Results (CFEN)

In the Base scenario, CFEN maintains a stable trajectory thanks to growth in available stable funding, offset by higher funding requirements, preserving regulatory compliance throughout the projection. In the Adverse scenario, a downward

trend is observed, explained by reduced dynamism in funding sources and maturities that reduce the availability of stable resources, without breaching regulatory limits. The application of mitigants, primarily the shift toward more stable funding and the anticipation of subordinated issuances, partially reverses the decline and restores adequate liquidity levels.

Meanwhile, the Adverse scenario involving uncertainty in trade relations shows a more favorable performance than the general adverse scenario, due to lower pressure on required funding and stress conditions concentrated in macroeconomic variables. In this scenario, the CFEN remains above the appetite limit and exhibits a stable trajectory, which is strengthened by the implementation of additional mitigants.

In line with the supervisor's guidelines, we incorporated a cybersecurity event into the Adverse scenario by simulating a significant technological incident with the potential to affect operational continuity and the provision of critical services. The analysis considered operational, reputational, and financial impacts, as well as the activation of response and recovery measures, with the aim of evaluating institutional resilience and strengthening management capabilities in the face of such events.

Finally, the Stress Test exercise is a key tool for planning and monitoring the Bank's financial situation, as it facilitates the anticipation of risks, the coordination of efforts, and the definition of actions to preserve our soundness and sustainability, offering society a reliable Bank to accompany its financial evolution.



SARLAFT

The **Anti-Money Laundering and Counter-Terrorist Financing Risk Management System (SARLAFT)** enables us to comply with national and international regulations for the prevention of financial crimes, protect our reputation, and reduce the risk of becoming involved in illicit activities.

Within this framework, we primarily carry out the following actions:

- **Customer due diligence:** It is essential for us to know our customers by collecting and verifying information such as identity, source of funds, and economic activity, among other aspects. Based on this, we conduct a risk assessment that considers the customer's profile, transactional behavior, and geographic location.
- **Transaction Monitoring:** We continuously monitor transactions to identify unusual patterns or red flags that may indicate money laundering or terrorist financing, such as large-sum transactions, international transfers, or behavior that does not match the customer's profile.

- **Reporting of Suspicious Transactions:** When we identify a suspicious or attempted transaction, we report it to the **Financial Information and Analysis Unit (UIAF)**, as the competent authority in this matter.
- **Ongoing training:** We regularly train our employees to strengthen their ability to identify red flags and understand the importance of SARLAFT compliance in daily operations.
- **Audit and evaluation:** We conduct internal audits to assess the effectiveness of the system, verifying that procedures are functioning properly and that applicable requirements are met.
- **Comprehensive risk management:** We identify and assess the risks inherent in our operations and implement mitigation measures against money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction. This includes, among other things, the segmentation of higher-risk customers, controls over specific financial products, and additional security measures when appropriate.



Systemically Important Banks

| SASB FN-CB-550a.1 |

In accordance with **Circular Letter 068 of 2025** from the Financial Superintendency of Colombia (SFC) and in compliance with paragraph 2.1.1.4.3 of **Decree 2555 of 2010**, the SFC published the list of **Systemically Important Institutions (SIIs)** for fiscal year **2026**, based on the methodology defined for their identification. For this calculation, information as of **June 30, 2025**, submitted to the **Financial System Coordination and Monitoring Committee**, was used.

With these results, we **ranked third**, with a score of **9,58%**, above the threshold of **6,45%**, meaning that once again, and for the **second consecutive time**, we were considered a systemically important bank. It is important to note that this classification **does not represent a risk assessment or rating** of the institutions.

In this context, the Bank must continue to build the **additional buffer for systemically important institutions**, equivalent to **1% of assets weighted for credit, market, and operational risk**, in accordance with the instructions and deadlines issued by the SFC in **Resolution No. 2629 of December 27, 2024**, as follows:



Leverage Components (Basel III)

BIS leverage components	2022	2023	2024	2025
(Basel III) Tier 1 capital	3.949.457 MM	4.348.265 MM	4.619.873 MM	4.728.823 MM
(Basel III) Total exposure (on- and off-balance sheet exposures)	56.629.015 MM	65.855.871 MM	75.193.855 MM	81.723.618 MM
(Basel III) Leverage ratio	6,97%	6,60%	6,14%	5,79%

Regarding the leverage components under Basel III:

- **Tier 1 Capital (Basel III):** It increased by **\$108.951 billion**, driven primarily by sustained capital growth resulting from the accumulation of profits during the year, which rose **7,8%** compared to 2024. This performance, combined with responsible decisions regarding profit retention, reflects our commitment—together with our shareholders—to maintain an adequate level of capital to meet regulatory requirements, support risk appetite, and preserve a solid capital structure that leverages future growth in line with the strategic and business plan.
- **Total Exposure (Basel III):** This corresponds to the aggregate value of all the Bank's credit exposures, both on and off balance sheet. The observed increase was primarily driven by the growth of the loan portfolio and the investment portfolio, consolidating our position as an active and increasingly relevant competitor within the Colombian banking system.





Environmental and Social Risk Management System (ESRM)

in Spanish SARAS



SDG 13.2
| SASB FN-CB-410a.2 |

In 2025, we continued to consolidate the **Environmental and Social Risk Management System (SARAS)** as a key component of our risk management and our commitment to increasingly sustainable finance. This system allows us to identify environmental and social risks associated with our clients’ activities at an early stage, manage them proactively throughout the credit process, and make more informed decisions.

The development of SARAS began in **2023**, based on an assessment and guidance from the consulting firm NINT, with whom we defined clear parameters for **classifying environmental and social risks among Corporate Banking** clients. Building on this foundation, we have advanced in the evaluation, monitoring, and tracking of risks that may arise during the credit cycle, strengthening our ability to prevent adverse impacts and protect business stability.

Beyond compliance, SARAS pursues a specific **objective: to reduce our exposure to regulatory, credit, operational, and reputational risks**, and to ensure that the financing we provide is delivered according to responsible criteria, with traceability and consistency.

Scope and ESG Approach in Credit Analysis

Our SARAS applies to **Corporate Banking** operations, including the **Small Business 1 and 2, Corporate, and Government** segments, as well as operations managed by the **Structured Finance Unit (UFE)**. This scope cuts across all industries and sectors and is incorporated as part of the analysis we conduct for every transaction we evaluate.

We integrate **environmental, social, and governance (ESG)** criteria into our credit analysis to better understand the nature of risk and anticipate potential impacts. In this assessment, we consider, among other aspects, elements such as the client’s relationship with **protected areas or the SINAP**, potential impacts on **water resources and soil**, respect for **human rights**, and practices related to **gender equality and equity**. This approach allows us to strengthen our comprehensive risk assessment and define, where applicable, recommendations or conditions associated with the transaction.

This approach results in an environmental and social risk classification that guides subsequent management and decision-making, maintaining a principle of consistency; **100% of SARAS assessments** are applied to our **Corporate Banking** clients, and the assessment is triggered in accordance with the guidelines and criteria defined in the system.



SARAS Methodology

To ensure that the environmental and social assessment does not remain merely an intention, we have turned it into a clear and repeatable process. SARAS is designed to accompany the **credit cycle** with consistent criteria, from the **initial screening to monitoring**, and to ensure that risks are identified in a timely manner and managed with defined responsibilities.

How SARAS works: three stages that structure the management

1. Exclusion List

We begin by defining what we do not finance and what could only be considered under very specific conditions. This list allows us to identify activities **that are ineligible for financing** due to their environmental and social impacts, and it also includes some **exceptions**, always ensuring that such activities do not exceed **5% of the Bank's total portfolio**

2. Risk categorization

Based on information about the client and the transaction, we determine the environmental and social risk category. This stage applies to all **Corporate Banking clients** and allows us to focus our efforts where they are truly needed.

3. Environmental and Social (A&S) Risk Assessment

When an operation is classified as **Risk A or B**, we conduct a more in-depth assessment to identify potential impacts and define recommendations, commitments, and, if applicable, mitigation measures. This stage applies to clients categorized as **Risk A or B**.

We work with **three categories**, defined in our SARAS manual and based on specific criteria:

- **Risk A (high):** operations associated with the **UFE** that correspond to projects in the **pre-construction or construction** phases and exceed **USD 10 million**.
- **Risk B (medium):** transactions whose activities may require an **environmental license** under applicable regulations and/or exceed **USD 10 million**.
- **Risk C (low):** operations with lower environmental and social exposure, which follow the normal credit cycle.

Frequency of assessment and monitoring

Since SARAS applies to **Corporate Banking** operations, its assessment is **ongoing**: we analyze operations as they enter the process and monitor them using the tools defined to identify, report, and monitor environmental and social risks.

Governance

In 2025, we maintained a working model where different areas contribute their perspectives, and where environmental and social assessment is not an isolated step, but part of the comprehensive discussion regarding the risk and viability of each transaction. **A collaborative effort with clear responsibilities**.

SARAS management is built on the contributions of several complementary areas:

- **Corporate Banking Sales Force:** supports the client and gathers the information needed for the analysis, ensuring that inputs are complete and timely.
- **Sustainability:** conducts the environmental and social analysis in a technical and independent manner, in accordance with SARAS guidelines.
- **Credit and Credit Risk:** conducts the financial and credit analysis and comprehensively reviews the transaction based on the Bank's risk criteria.





This parallel and independent work strengthens the quality of the evaluation, as it allows for the comparison of perspectives and ensures that the final decision is supported by comprehensive analyses.

When the nature or level of risk of the operation requires it, the approving bodies receive a **technical environmental and social report** that compiles considerations, conclusions, recommendations, and, where applicable, specific clauses or conditions associated with the loan.

This report is prepared by the **Senior Environmental Analyst**, who leads the comprehensive assessment of environmental and social risks based on SARAS guidelines. Its purpose is to provide technical input that enables the approval bodies to **identify, assess, and manage** potential risks, and to define the commitments required of the client as part of the approval.



Approval Levels and Final Decision

All credit operations, regardless of their environmental and social risk category, go through the **same levels of analysis and approval** defined by the Bank. The difference lies in the depth of the assessment and the technical requirements that are triggered based on the identified risk level.

In general, the process unfolds as follows:

- The **sales team** gathers information on the client and the transaction.
- **Credit and Sustainability** analyze the financial/credit and environmental/social components in parallel.
- The findings are consolidated and presented to the **credit approval bodies**, which make the final decision with a comprehensive view of the risk, considering the analyses and recommendations of the involved departments.

Environmental and Social Due Diligence

There are transactions that, due to their nature, complexity, or level of exposure, require a more in-depth review. In such cases, environmental and social due diligence helps us **make more informed decisions and define specific commitments** that protect both the Bank and our clients.

When SARAS identifies a transaction with a **high risk level**, we activate a specific procedure that requires specialized analysis. The client must hire an **independent external expert** to conduct the environmental and social due diligence and prepare the corresponding report. This document becomes a key input, as it allows for a deeper examination of potential impacts, gaps, management measures, and recommendations.

Before the transaction proceeds to the decision-making stages, the report is reviewed by the **Senior Environmental Analyst**, who validates its scope and conclusions and grants approval as a prerequisite for its submission to the **credit approval body**. Through this process, we ensure that, if necessary, approval includes clear conditions, requirements, or commitments for the client, aligned with preventive risk management.

Integration of SARAS into Credit Analysis

In 2025, we took a key step to strengthen the consistency of SARAS by incorporating it into the **automated credit workflow on the Bizagi platform**. This integration allowed approximately **90% of credit operations** to be managed through that workflow, with a more organized process and clearer controls from the outset.

Beyond technological advancements, the implementation of Bizagi has had a very practical impact on management: we have improved the traceability of each assessment, as well as the monitoring and quality of information related to environmental and social risks. At the same time, Bizagi continues to undergo a process of constant improvement to achieve 100% implementation of our operations in the tool and consolidate a robust database, enabling us to conduct increasingly precise monitoring and tracking. This approach helps us work with greater rigor, identify opportunities for improvement, and ensure that decisions are made with complete, comparable information available at the right time.



SARAS Results and Performance

In 2025, SARAS was shown in concrete data, more operations assessed, greater traceability, and a more accurate reading of environmental and social risk in our Corporate Banking portfolio. This monitoring allows us not only to measure but also to continuously adjust and strengthen the process.

Assessed Transactions and Risk Levels 2023—2025

SARAS	2025	2024	2023
Total projects/operations assessed under SARAS	13.394	4.994	170
Low-level operations (No. and %)	13.292	4.962	163
Mid-level operations (No. and %)	102	30	7
High-level operations (No. and %)	0	2	0
Total transactions rejected due to environmental or social risks	1	N/A	N/A
Total operations approved with mitigation conditions	0	N/A	N/A
Average days to complete a SARAS assessment	2	2	3



Greater coverage and consolidation of the process: we went from 170 operations assessed in 2023 to 4,994 in 2024 and 13,394 in 2025, reflecting the consolidation of SARAS as part of the Corporate Banking credit cycle.



Primarily low risk: in 2025, most transactions were classified as low risk (13,292), while 102 were classified as medium risk and 0 as high risk.



Efficiency in assessment: the average time to complete a SARAS assessment remained at 2 days in 2024 and 2025 (compared to 3 days in 2023), indicating a more stable and efficient process.





2025 Distribution by Risk Category

As of the end of 2025, the total number of our assessed operations was 13.394, with a total associated amount of \$78,81 BCOP.

Risk	Number of transactions	Amount	Participation Percentage
A (high)	0	0	0%
B (medium)	102	\$ 4,39 BCOP	0,76%
C (low)	13.292	\$ 74,41 BCOP	99,24%

- **Risk C: 13.292 transactions (99,24%)**, representing the main volume evaluated under the system.
- **Risk B: 102 transactions (0,76%)**, where we initiated more targeted reviews and management and monitoring measures.
- **Risk A: 0 transactions (0%)** in the reporting period.



Financing Large-Scale Projects

In large-scale projects, risk management requires looking beyond the financial picture. That is why, at the **Structured Finance Unit (UFE)**, we incorporate ESG criteria across the board as part of our analysis of transactions, especially in construction projects, where exposure and potential impacts can be greater.

This approach results in a comprehensive review that combines technical, financial, and ESG considerations. In our analysis, we verify aspects such as the **existence and validity of permits, licenses, and authorizations** required for the project’s development, and we maintain open dialogue with the client to understand their context, management capacity, and the need to conduct **environmental and social due diligence**, depending on the complexity and level of risk.

To present a transaction to the **Credit Committee**, we first prepare **term sheets**, which are reviewed and validated by the team involved in the analysis. Additionally, we involve a Project Engineer, who assists in validating the technical information and supporting documentation provided by the client, thereby strengthening the consistency of the evaluation.

We adhere to a clear principle in this process: **we do not make disbursements** when the client has not provided the required information or does not meet the defined conditions. That is why we establish **conditions precedent** for disbursements, including the mandatory requirement that the client hold the permits and licenses required by applicable regulations and necessary for the project’s execution. In doing so, we seek to mitigate environmental, social, regulatory, and reputational risks, and ensure that financing is carried out in accordance with responsible standards.

In terms of amounts, this classification also helps us understand where exposure is concentrated and in which cases we should strengthen monitoring or establish additional commitments with the client.

These results, together with the traceability of the process, allow us to track the consistency of the assessment and how SARAS is integrated into decision-making.

In 2025, we recorded:

- **1 transaction rejected** due to environmental or social risks.
- **0 transactions approved** with mitigation conditions reported in the indicator.



Equator Principles

Currently, the Bank is not a signatory to the Equator Principles. However, we have our Environmental and Social Risk Management System (SARAS), applied to **Corporate Banking** operations with a special emphasis on projects structured and financed by the **Structured Finance Unit (UFE)**.

This emphasis has a practical reason. Due to their size, complexity, and nature, the projects handled by the UFE are those most likely to fall into **medium or high** environmental and social risk categories. Therefore, within the categorization process, we incorporate differentiated information for these cases, such as the **transaction amount and the project phase** (pre-construction or construction), elements that directly influence the final risk classification.

Specifically, when a project is in the **pre-construction or construction** phase, its environmental and social risk classification is defined as **high**, given the greater exposure and potential impacts inherent in this type of activity. From there, the SARAS team conducts the assessment using the tools and guidelines established in the policy and manual, and works closely with the sales force and the client to ensure proper management of the information and identified risks.

Goals, Challenges, Opportunities, and Lessons Learned

In 2025, we continue to strengthen SARAS, learning from daily operations, adjusting tools, and building capacity so that environmental and social assessments become increasingly consistent, traceable, and useful for decision-making. This progress was reflected both in the integration of the system into the credit workflow and in our work with the teams involved in the assessment.

Our 2025 Achievements

- ✓ We implemented SARAS within the Bizagi credit workflow, which is the path a transaction follows from the moment it enters the system until its assessment is completed. Its objective is to standardize, automate, and ensure traceability throughout the entire SARAS process, thereby strengthening traceability and the quality of information.
- ✓ We strengthened technical capabilities in commercial areas and within credit teams, improving understanding of environmental and social risk.
- ✓ Thanks to the training, we identified cases that initially appeared to be low-risk but required further review. This led us to conduct a double check, and to apply more targeted assessments when appropriate.
- ✓ We adjusted and refined the process to improve the quality of the data and analysis.

Lessons Learned 2025

- ✓ **Monitoring higher-exposure operations (risks A and B):** we made progress in strengthening monitoring processes throughout the credit cycle, with a **partially completed** result.
- ✓ **Full integration of the process into Bizagi:** we worked to incorporate SARAS into the credit workflow. This goal was also **partially completed**, with a key milestone: the system operated in Bizagi for nearly **90%** of the evaluated transactions.
- ✓ **Training to minimize errors and improve quality:** this goal was completed, leaving established capabilities within the commercial and credit teams.



Challenges and Opportunities for 2026

- ✓ Incorporate information related to **Climate Change and Biodiversity** into SARAS.
- ✓ Continue strengthening training for the relevant areas to minimize errors and ensure consistency in the evaluation.
- ✓ Comply with the implementation of SFC Circulars **015 of 2025 and 067 of 2025**.
- ✓ **Horizon 2027:** Advance the **systematization/automation** of SARAS tools to improve the quality of the process.
- ✓ Identify potential clients who, due to their business activities or the financing they require, fall under the **green and social taxonomies**, in line with our sustainable banking goal.
- ✓ Continue to identify environmental and social risks in the Corporate Banking portfolio to anticipate and avoid **operational, reputational, regulatory, and financial impacts**.

We promote sustainable business

In 2025, we reaffirm our commitment to building a sustainable future for the country by integrating environmental, social, and governance (ESG) criteria into our operations and the way we support our clients. As a bank, we understand that sustainable financing is not just a trend: it is a responsibility and, at the same time, a concrete opportunity to drive Colombia's economic, social, and environmental development.

Sustainable Finance Approach and Vision

Throughout the year, we consolidated our vision of **Sustainable Banking**, a strategic initiative through which we aim to contribute to the **progressive decarbonization** of our clients and promote **comprehensive, responsible, and transparent** credit decisions. This initiative aligns with the pillars of our **Sustainability Strategy**, through which:

- ✓ We strengthen **governance**.
- ✓ We drive **profitable growth with an ESG focus**.
- ✓ We generate **social value**.
- ✓ We make progress in **climate change mitigation and adaptation**.

In 2025, we made particular progress in:

- ✓ **Internal capacity building**, so that our teams have practical tools and clear criteria for identifying ESG opportunities.
- ✓ **Delivering value to customers**, aimed at facilitating the adoption of responsible practices and access to financial solutions that support their transition.

In this vein, we implemented a **Sustainable Banking Learning Path**, which included:

- ✓ In-person training sessions with partners specializing in **renewable energy**.
- ✓ The creation of a **sustainability module** available on our internal learning platform.
- ✓ The development of the "**Sustainable Taxonomy**" module, designed to support sales teams in identifying and managing ESG opportunities.

Complementarily, we developed our **sustainable partnership model**, aimed at consolidating strategic relationships with expert consultants and suppliers that allow us to support our clients with greater technical depth, especially in sustainability and risk. These partnerships seek to:





- ✓ Drive improvements in our clients' **competitiveness and reputation**.
- ✓ Guide them toward solutions that generate **significant economic efficiencies**.
- ✓ Expand our support capabilities through an **ecosystem** that accelerates the transition toward more sustainable and profitable business models.
- ✓ Support our clients through strategic partnerships.
- ✓ Promote the adoption of responsible practices and efficiency in resource use.
- ✓ Strengthen our clients' competitiveness and drive their commitment to sustainable development.

Our purpose is clear: **to make the development of people, the growth of businesses, and the transformation of the country a reality.** That is why, through sustainable financing, we work to help more companies prepare for the challenges of the future, take advantage of new opportunities, and generate positive impacts in their communities and regions.





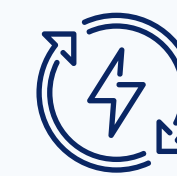
Environmental and Social Taxonomy

To guide our financing decisions toward projects with clear environmental benefits, in 2025 we continued to strengthen our Environmental Taxonomy as a practical guide for identifying, classifying, and ensuring the traceability of resource allocation. This framework allows us to support our clients in initiatives that contribute to climate change mitigation and adaptation, efficient energy and water use, the circular economy, biodiversity protection, and sustainable mobility, promoting responsible investments that generate value for local communities and the country.



Energy efficiency

- Energy efficiency in equipment or processes.
- Heat recovery.
- Cooling and heating systems.
- Fuel substitution.
- Cogeneration and district heating systems.
- Energy improvements in urban and/or rural infrastructure.



Renewable energy

- Solar energy.
- Wind energy.
- Geothermal energy.
- Biomass energy.
- Ocean energy.
- Hydroelectric power plants.



Sustainable agriculture

- Best livestock farming practices.
- Sustainable agriculture.



Green buildings

- Construction of new homes and buildings.
- Renovation of homes and new buildings.
- Sustainable urban development.



Protection of biodiversity and natural resources

- Sustainable forest management.
- Ecosystem restoration and/or reforestation.
- Climate adaptation actions.
- Nature-based solutions.



Clean transportation

- Hybrid vehicles.
- Electric vehicles.
- Euro VI technology vehicles.
- Dedicated CNG vehicles.
- Infrastructure for sustainable transportation.



Sustainable water management

- Water supply, sanitary sewer, and/or wastewater treatment systems.
- Efficient water use.



Waste management

- Material recycling.
- Products with sustainable design and/or development.
- Environmental initiatives involving food products.
- Waste treatment and disposal.



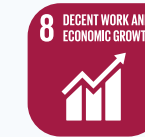
Other sustainable investments

- Certified sustainable tourism.
- Energy service companies.
- Sustainability-certified companies.
- Other initiatives with environmental impact not listed.



Social Taxonomy

In 2025, we continue to consolidate our **Social Taxonomy** as a tool that directs financing toward initiatives that generate well-being and expand opportunities for people and communities. This framework allows us to identify and support projects with social impact, such as strengthening SMEs and microenterprises, employability and entrepreneurship among vulnerable populations, **affordable basic infrastructure**, and access to **essential services** like housing, education, health care, drinking water, and sanitation. In this way, we foster a banking system that promotes inclusion, equity, and territorial development, linking financing to tangible social outcomes.



Financing of companies engaged in socially focused activities

Companies that finance or include within their value chain activities such as:

- Productive activities of young people between the ages of 18 and 28.
- Microenterprise activities by women or women engaged in productive activities.
- Activities involving older adults (women: over 57 years old; men: over 62 years old).
- Activities located in vulnerable areas.
- Microenterprises working with vulnerable communities or in vulnerable areas.
- Projects or activities involving small-scale agricultural producers and/or agribusinesses.
- Projects or activities that promote employability for (LGBTIQ+)
- Microenterprises in general.



SMEs (with a social focus)

- Financing projects aimed at protecting employment and revitalizing businesses.
- Financing projects that contribute to the creation of formal employment, entrepreneurship, and job placement for vulnerable people, as well as the promotion of entrepreneurship among the rural population.



Women-Owned SMEs

- Eligible expenses include financing and/or refinancing of costs related to the operation or improvement of productive activities, or activities aimed at promoting equality and human rights throughout the value chain through equitable compensation, advancing equality and non-discrimination in the workplace, and employment of disadvantaged groups, among other causes that seek to help the community.



Affordable Basic Infrastructure

- Programs and projects that improve the conditions and quality of urban, regional, and rural public transportation, including infrastructure improvements interoperability, service reliability, and transportation availability.
- Projects to construct or improve urban and rural access roads and the conditions of land, river, and maritime transport.



Essential services: affordable housing, education, health services, and water and sanitation.

- Financing of projects and programs aimed at improving the quality of and access to primary, secondary, and higher education for vulnerable children and youth.
- Funding for construction, construction improvements, and assets in the hospital sector, targeting public and/or private hospitals located in municipalities with multidimensional poverty.
- Funding for initiatives and measures aimed at the acquisition, construction, repair, expansion, improvement, renovation, or leasing of public housing.
- Funding for projects related to improving access to, reliability of, and quality of basic services for the treatment and distribution of drinking water, and the collection and treatment of wastewater.



Growth of the sustainable portfolio

Our commitment to sustainable finance is reflected in concrete results. At the end of 2025, the sustainable portfolio reached \$4.5 billion, demonstrating the Bank's progress in mobilizing resources toward initiatives with positive environmental and social impact. This performance reaffirms our role as a strategic partner in promoting sustainable businesses and supporting the country's transformation.

Composition of the sustainable portfolio

Of the total sustainable portfolio as of the end of 2025:

- ✓ **91% corresponds to the Bank's own portfolio and 9% to the development portfolio.**
- ✓ **\$4,3 billion** comes from the **commercial portfolio** (Corporate, Business and SME, and Government), representing 95% of the total.
- ✓ **Retail Banking** (consumer and housing) contributed **\$0,2B**, equivalent to 5%.

58%



Social portfolio

42%



Environmental portfolio

Balance between social and environmental impact

Our sustainable portfolio demonstrates a solid balance between financing aimed at social welfare and projects that contribute to climate change mitigation and adaptation:

- ✓ **Social portfolio: \$2,6B**, with a primary focus on **women-owned SMEs**.
- ✓ **Environmental portfolio: \$1,9B**, focused on environmental and transition initiatives.

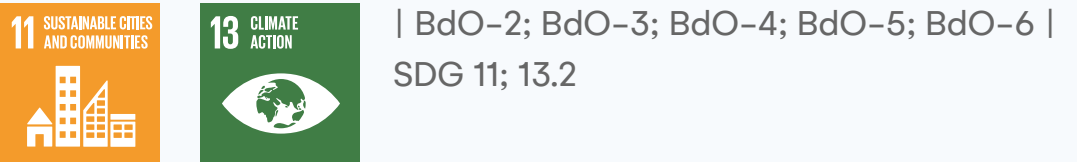
These results cement sustainability as a cross-cutting pillar of our banking approach:

- ✓ We promote access to financing for socially impactful projects.
- ✓ We support environmental initiatives that promote efficiency, energy transition, and climate resilience.
- ✓ We strengthened the Bank's capacity to identify and classify opportunities using an ESG approach, ensuring consistent portfolio growth.

With these advances, we remain motivated to **strengthen capabilities, partnerships, and value propositions by 2026**, expanding the positive impact of our sustainable portfolio and accelerating the transition toward a more resilient and competitive economy.



Sustainable financing products and services



With this vision, we offer financing options that allow our clients to incorporate ESG criteria into their economic activities and projects. For us, sustainable financing is not limited to a few specialized lines: essentially, any type of credit within our portfolio can be framed as a sustainable solution, provided it is intended for activities with a positive environmental or social impact, in line with our Environmental and Social Taxonomy.

In 2025, this offering was directed at our clients in:

- ✓ **Corporate Banking (Corporate, Business, SME, and Government segments).**
- ✓ **Retail Banking (consumer and housing).**

This scope is reflected in a **sustainable portfolio of \$4,5 billion**, equivalent to **56% of the progress toward the \$8 billion target by 2030**.

Our Offering

Our approach combines two ways of supporting clients:

- **Cross-portfolio approach:** all types of credit can be sustainable when they finance activities aligned with ESG criteria and our taxonomy.
- **Specific products:** we offer solutions designed for specific needs, such as Occiauto Planeta Azul, aimed at the purchase of hybrid and electric vehicles.

It is important to note that, while we actively promote sustainable financing, **we currently do not have loans tied to sustainability indicators or commitments**. Our goal is to continue **strengthening our offerings** to help more clients move toward responsible, resilient, and competitive business models.

Sustainable Financing Portfolio in Corporate Banking

In 2025, Corporate Banking consolidated a portfolio that enables us **to support corporate clients, small and medium-sized enterprises (SMEs), and government entities** in financing initiatives with a positive environmental and social impact, in line with our **Sustainable and Transition Taxonomy**. This progress is reflected in the following portfolio of solutions, which combines specific product lines (such as Green Construction and Green Leasing) with sustainable transactions channeled through our traditional credit products.

Portfolio of Green, Social, and Sustainable Loans

Categoría	Descripción	Valor monetario del año fiscal 2025 (Saldo de Cartera) (COP) Cifra completa.	No. de clientes
Green Builder Line	A line of credit designed to finance sustainable construction projects, i.e., those with sustainability certifications such as: Edge, LEED, CASA Colombia.	\$ 449.123.624.603	18
Green Leasing	A line of credit designed to finance projects and/or assets that promote sustainability practices within companies.	\$ 111.728.257.292	123
Other Corporate Banking Products	Through our products managed in Corporate Banking, Business Banking, and Government Banking, such as our regular portfolio, we finance sustainable initiatives/projects aligned with our Sustainable and Transition Taxonomy.	\$ 274.898.378.373	8
Other Business Banking Products		\$ 15.590.150.522	4
Other Government Banking Products		\$ 704.866.747.548	20
Structured Finance Unit	Financing of large-scale projects aligned with our Sustainable and Transition Taxonomy.	\$ 162.272.306.230	6
International Business (Foreign Currency)	Credit lines to support the growth and development of small and medium-sized enterprises, financing working capital and promoting foreign trade.	\$55.615.616.901	12
Total sustainable value		\$1.774.095.081.469	
Total value of corporate loans (Corresponds to the total commercial portfolio in local and foreign currency.)		\$34.338.459.000.000	
Percentage of total sustainable value relative to the total		5,2%	



Highlights of 2025

- ✓ **Green Builder:** As of December 2025, we reached a cumulative total of **45 approved projects worth \$1.662.488 million and disbursements of \$680.281 million.**
- ✓ Through **Corporate Banking**, we structured and financed flagship energy transition projects such as “**Puerta de Oro**” and “**Portón del Sol,**” with **disbursements exceeding \$200,000 million.**

Government Banking: Sustainable Financing with a Territorial Focus

In 2025, **Government Banking** continues to strengthen its capacity to support local governments in financing projects with a sustainable focus. This work takes on special relevance in a context of local government transitions and increased interest in initiatives that integrate environmental and social criteria, as well as new legislation that incentivizes this type of investment.

2025 Goals and Results

Concept	2025 Goal	2025 Result	2026 Goal
Disbursements and % of sustainable portfolio	Disburse a total of \$1.100.000 million; sustainable portfolio 24% (\$262.686 million)	A total of \$1.267.747 million was disbursed; sustainable portfolio \$478.420 million, meeting the 24% target	We project total disbursements of \$883.000 million; cartera sostenible 28% (\$247.240 million)



Projections and Challenges for 2026

- ✓ **Meet projected disbursements and the estimated percentage** of the sustainable portfolio relative to gross disbursements.
- ✓ By 2026, we plan to begin using **sustainable portfolio archetypes** to strengthen the identification and targeting of operations.
- ✓ **Local governments** will undergo a new change in administration and focus their agenda on **sustainable projects.**
- ✓ We observe an environment with greater regulatory momentum: **more governments are enacting legislation** to incentivize policies that contribute to environmental protection.



Sustainable financing for women-led SMEs

In 2025, we strengthened our commitment to economic inclusion and closing gaps in access to financing by promoting credit solutions aimed at **women-led SMEs**. For us, this approach not only contributes to business development but also enhances well-being in local communities by supporting businesses that generate employment, stability, and social impact.

We provide financing to **women-led SMEs** that meet at least one of the following criteria:

- **Ownership:** more than **50%** of the shares are owned by women.
- **Management:** more than **20%** of the shares are owned by women, or there is at least one woman on the management team (legal representative), or at least **30%** of the board of directors is composed of women.



Category	Description	Monetary value for fiscal year 2025 (COP) Full figure.	Number of customers
Women-Owned SMEs	Loans to women-led SMEs under the defined criteria.	\$ 2.007.335.783.320	4.767
International Business (Women-Owned SMEs — Foreign Currency)	Lines of credit focused on working capital and foreign trade for this segment.	\$ 88.462.860.495	118
Total sustainable value		\$ 2.095.798.643.815	
Total loan value (corresponds to the commercial portfolio of the corporate and SME segment and foreign currency)		\$ 15.817.587.740.775	
Percentage of total sustainable value relative to total value		13,2%	

- ✓ **Clear focus on Women-Owned SMEs:** the majority of the sustainable value comes from financing for **Women-Owned SMEs (\$2.095B)**, which reaffirms the Bank’s emphasis on financial inclusion and business growth with a social focus.
- ✓ **Massive reach in the segment:** **4.767** supported Women-Owned SME **clients** demonstrate **widespread reach** and a value proposition with broad access to the business ecosystem led by women.
- ✓ **Strategic international complement:** International Business (ME) operations total **\$88.463 billion** with **118 clients**, contributing to working capital and foreign trade, and expanding internationalization opportunities for this segment.

This performance reflects the strong traction and relevance of **Pyme Mujer** to our social focus, as it accounts for most of the sustainable balance reported for this segment. At the same time, the Bank is working to expand the scope of its support by offering alternatives for companies with foreign trade and working capital needs in foreign currency.



International Business — Foreign Currency

2025 Milestones

- ✓ **Management of sustainable funding totaling USD \$110 million** through correspondent banking, with an environmental and social focus, contributing to our “**We Are Sustainable**” strategy and to the growth of the foreign currency portfolio:
 - ✓ **USD \$50 million with Citibank**
 - ✓ **USD \$60 million with CAF — Development Bank of Latin America and the Caribbean**
- ✓ We are strengthening these initiatives as a means to **drive operations and projects with a sustainable focus**, expanding access to resources that address climate challenges and support business competitiveness.

2026 Goal

- ✓ **Increase sustainable lines and alternatives for foreign currency financing**, strengthening the Bank’s capacity to offer competitive solutions

that support our clients’ growth and sustainable transformation plans.

Key Challenge

- ✓ **Ensure the availability of sustainable lines of credit with correspondent banks at competitive and attractive rates**, so that lending remains profitable for the Bank and convenient for our clients.

Opportunities We See Ahead

- ✓ **The international market’s growing appetite** for sustainable operations and projects opens up **new opportunities for foreign currency funding**.
- ✓ The Bank’s **prioritization of a sustainable approach** will continue to facilitate the advancement and development of initiatives that strengthen our value proposition in international operations.

Financial Inclusion in SMEs: Credit Reach and Portfolio Quality

| SASB 240a.1, SASB 240a.2 |

The information presented by Banco de Occidente reflects the scope and quality of the SME loan portfolio, considering transaction volume, outstanding balances, and delinquency status. This disclosure highlights the Bank’s contribution to financial inclusion and its focus on prudent credit risk management in the small business segment, in line with its sustainability and transparency strategy.

SME Segment	Current (0 days past due)	Past Due 2025 (1 to 60 days past due)	Non-performing 2025 (over 60 days past due)	Total Balance 2025
Number of Loans	Number of Loans	1.610	2.385	20.498
Principal Amount	Principal Amount	\$ 305.208.975.389	\$ 342.460.303.330	\$ 4.433.382.815.302
Amount Past Due	Amount Past Due	\$ 1.076.149.864	\$ 342.460.303.330	\$ 393.536.453.194

Figures in COP.





Development Portfolio

To continue expanding access to impact financing, **we have consolidated a development portfolio** that strategically leverages the rediscount lines of **Bancóldex, FINDETER, and FINAGRO**. These funding sources allow us to offer our clients favorable financial terms to drive projects that promote **energy transition, resource efficiency, productive modernization**, and the strengthening of the business ecosystem.

In 2025, this effort resulted in a **sustainable development portfolio of \$392,117 million**, focusing primarily on **renewable energy, energy efficiency, clean transportation, and women-owned SMEs**. More than just numbers, this portfolio represents a concrete tool for **reducing gaps in access to financing**, supporting **SMEs** and productive sectors in their adaptation, and accelerating investments that generate environmental and social value.

Sustainable Loans – Development Portfolio

Category	Description	Monetary Value for Fiscal Year 2025 (Portfolio Balance) (COP) Full figure.	Number of clients
Bancóldex	Special credit line aimed at financing circular economy, bioeconomy, and/or climate change management projects	\$ 9.276.526.973	40
Bancóldex (Women Entrepreneurs MSME Credit Line)	Credit lines aimed at promoting women’s participation in the country’s productive activities.	\$ 851.430.631	8
FINDETER	Loans to support various sectors, public and private companies, and local governments in their investment projects aimed at sustainable development.	\$ 319.607.625.447	19
FINAGRO	Credit lines to promote sustainability in Colombia’s agricultural, forestry, and fishing sectors.	\$ 8.283.567.378	14
Women’s SME Development Portfolio	Loans to women-led SMEs under defined criteria.	\$ 54.098.200.383	98
Total sustainable value		\$ 392.117.350.812	

Cifras en COP.





Personal Banking: Sustainable Solutions for Everyday Decisions

At Banco de Occidente, we also promote sustainability through Personal Banking, offering financing options that allow our customers to incorporate environmental and social criteria into everyday decisions such as transportation, housing, and energy efficiency. Through our portfolio, we promote more responsible consumption habits and support families in their transition toward alternatives with a smaller environmental footprint.

In 2025, the Personal Banking sustainable portfolio reached a balance of \$242.723.326.850, representing 1,4% of the Bank's total personal and mortgage loans (\$16.780.000.000.000).

Category	Description	Monetary value for fiscal year 2025 (Portfolio Balance) (COP) Full figure.	Number of customers
Occiauto Planeta Azul	Credit line for customers looking to purchase hybrid or 100% electric vehicles.	\$ 195.969.583.392	2.487
Planeta Azul Housing	A line of credit designed for the purchase of sustainable housing, both for subrogated projects (financed by Banco de Occidente) and direct projects (projects not financed by Banco de Occidente), with the key requirement that the properties must hold sustainable housing certification.	\$ 46.596.698.269	181
Planeta Azul Solar Energy	Unsecured loan for solar panels (Standard Portfolio and Personal Loan Quota)	\$ 157.045.189	4
Total sustainable value		\$ 242.723.326.850	
Total value of personal and mortgage loans		\$ 16.780.000.000.000	
Percentage of total sustainable value relative to total value		1,4%	

Figures in COP.





Occiauto Planeta Azul: Goals, Lessons Learned, and Prioritiess

In 2025, we remained focused on continuing to consolidate a competitive offering for hybrid and electric vehicles, recognizing that access to preferential terms is key to accelerating the transition toward cleaner mobility.

2025 Goals and Results

- ✓ **Goal 1:** Increase the amount disbursed for hybrid and electric vehicles by **15%**.
 - ✓ **2025 Results:** **9%** of the target was achieved, impacted by a significant challenge in **inventory management** with partner dealerships.
- ✓ **Goal 2:** Increase the **portfolio balance** for hybrid and electric vehicles by **20%**.
 - ✓ **2025 Result:** **9,5%** of the target was achieved, in an environment of constant competition for portfolio acquisition, which reinforced the need to adjust positioning and retention strategies.

Goals, Challenges, and Opportunities for 2026

- ✓ Increase the **amount disbursed by 15%** for hybrid and electric vehicles.
- ✓ Increase the **portfolio balance by 15%** for hybrid and electric vehicles.

- ✓ Maintain **competitive pricing**, ensuring that customers perceive a benefit compared to combustion-engine vehicles.
- ✓ Continuation of tariff benefits and advantages associated with peak-and-plate restrictions.
- ✓ Greater market dynamism driven by the arrival and expansion of brands such as **Tesla**, and the momentum of manufacturers with strong momentum in sustainable mobility, including **BYD, Chery, Nissan, and Toyota**, among others.

Vivienda Planeta Azul: Building Positioning for Growth

At Vivienda Planeta Azul, we identified a strategic opportunity: **to prioritize the Bank’s positioning in sustainable projects**, in coordination with marketing and the segment.

- ✓ The business model has been **strengthening our presence in sales offices**, which will allow us to **generate inventory** and improve the pace of sales in **2026**.
- ✓ **2025 Milestone:** expanded commercial structure planned to ensure **coverage and presence** in showrooms during **2026**.



Information security, cybersecurity, and system availability

Digital Transformation

Aligned with the Bank’s corporate strategy, since 2024 we have focused our teams on building an end-to-end (E2E) digital experience for individuals and businesses. Our goal has been clear: to enable customers to digitally obtain approval, open accounts, or receive disbursements for key products—including credit cards, personal loans, savings accounts, and CDs—with greater autonomy.

In 2025, we moved forward with a practical vision: to connect digital capabilities with the Bank’s systems, simplify steps, and reduce processing times without sacrificing security or support when needed. This combination of self-service and assisted workflows allowed us to improve customer experience, free up operational capacity within the sales force, and accelerate processes that were previously longer and manual.

Key Achievements and Progress in 2025

- ✓ **Integration of digital tools with the Bank’s legacy systems (retail banking).**

We connected the digital tools for assisted customer workflows with the Bank’s legacy systems for **Housing and Free Investment**. This freed the sales team from the operational burden associated with **double data entry** and generated savings by eliminating **duplicate queries** in the processes.

By early 2026, the digital tool for **Vehicles** will be connected to the legacy system, completing this initiative.



Digital CDT

In early 2025, we rolled out the **digital CD** on the **Banking Portal**, and in October we supplemented it with a flow in **Mobile Banking**. Both are **self-service**: customers can simulate and view the product's returns and open an account through a more intuitive, easy, and fast experience.

In **just two screens** and in approximately **two minutes**, without having to visit a branch, the customer can open the account.

Fewer steps, faster processing

We focused on reducing the steps required for product applications by implementing short, assisted, and self-service workflows. This enabled faster and more effective account openings, reducing the number of screens and the total time to activate a product, with workflows taking as little as 2 minutes.

In total, we developed 7 short workflows distributed across the Banking Portal, Mobile Banking, and the Website.

Digital international transfers (individuals)

We enabled international transfers for individuals through the Banking Portal (November) and Mobile Banking (December) for transfers in dollars and euros for amounts under USD \$10,000.

This was a milestone: we digitized the customer-facing process, reducing the time from one hour to 10 minutes, with a more intuitive workflow.

Self-managed credit card

We achieved a key milestone by enabling self-managed credit card workflows, creating a fully digital experience for the customer and freeing up the sales force.

Savings Ecosystem

We designed an addition to our savings ecosystem: in March, we launched Kubo Rentable, a high-yield savings account with one of the most competitive rates on the market, offering an 8,25% effective annual rate of return (rate as of December 2025).

By year-end, we had opened 7,516 Kubo accounts.

Electronic Signature

Thanks to the electronic signature, in addition to improving customer experience, we processed nearly 50,000 transactions, which represents approximately 38 trees saved.

SME and Corporate MVP

In line with our digital strategy, the MVP aimed at SME and Corporate clients enables the opening of digital accounts (savings and checking) through an assisted process, reducing opening times from 1,5 days to 3,2 hours.

This MVP is designed for companies seeking greater transactional incentives and fewer operational and documentation hurdles, with 24/7 access to the portal.

Digital Payroll MVP

We established a comprehensive workflow for the creation, activation, and delivery of accounts to employees, combining automated processes, self-service, and in-person support.

This enabled **75%** of employees at companies with a legal agreement to **set up their accounts through self-service**.





Digital Sales

| BdO-1 |

The following table presents the distribution of digital sales by channel, reflecting how our customers choose to interact and complete transactions through the various touchpoints:

Channel	Description	Amount	Share
Digital Campaigns	This channel has proven to be the most effective, due to its ability to generate high sales volumes through digital strategies.	\$ 734.200.000.000	77,45%
Online Banking	Although it ranks second, this channel remains key for customers who prefer to conduct their transactions through the Bank’s web platform.	\$ 146.727.600.325	15,48%
WhatsApp	This channel enables more direct and personalized interaction with customers, facilitating simple transactions and inquiries.	\$ 56.104.000.000	5,92%
Mobile Banking	An important channel for customers who prefer to conduct transactions via their mobile devices.	\$ 11.028.097.247	1,16%

Figures in COP..

The results show a clear focus on **Digital Campaigns**, which contributed **\$734.200.000.000** and accounted for **77,45%** of the total, confirming it as the most effective channel for driving high sales volumes thanks to the reach and segmentation capabilities of digital strategies. In second place, the **Banking Portal** accounts for **\$146.727.600.325 (15,48%)**, remaining a solid alternative for customers who prefer to manage their transactions via the web platform. Meanwhile, **WhatsApp recorded \$56.104.000.000 (5,92%)**, standing out as a more direct and personalized interaction channel, useful for inquiries and simple transactions. Finally, **Mobile Banking** reached **\$11.028.097.247 (1,16%)**, highlighting an opportunity to further strengthen the adoption and usage of the mobile channel, improving the experience, and promoting its use at key moments in the customer journey.

In 2025, we saw how digital transformation translated into concrete results: **we sold 11.809 units through our digital platforms**, confirming that more customers are choosing to meet their needs in an agile, simple, and frictionless way. This performance reflects not only the adoption of these channels but also the effort to design clearer and more effective customer journeys for each product.

Total digital sales in 2025: 11.809 units, distributed as follows:

- ✓ 6.570 Kubo account openings.
- 2.022 CD accounts opened.
- 1.939 approvals for unsecured personal loans.
- 1.082 savings accounts opened.
- 158 credit card approvals.
- 38 vehicle loan approvals.

An analysis of the channels shows a clear concentration: the transactional portal was the main driver, with **11.650 sales (99%)**, while mobile banking contributed **159 sales (1%)**. This trend provides valuable insight for continuing to enhance the customer experience, understanding what works best in each channel and where we can further promote self-service.



Source of sales by digital activations (campaigns and formats):

- ✓ Banner on Transactional Portal: 10.982
- ✓ Pop-up on Transactional Portal: 364
- ✓ Banner on MarketPlace: 304
- ✓ Banner on Mobile Banking: 159
- ✓ Total: 11.809

En 2025 nuestros canales digitales no solo acompañaron las ventas: también se consolidaron como una vía cotidiana para hacer transacciones y mover la vida financiera con agilidad. Vimos una activa participación de los clientes y un volumen alto de operaciones, lo que nos confirma que la conveniencia y la accesibilidad ya son parte central de la experiencia que esperan de nosotros.

Here's how our channels performed in 2025:

- ✓ 205.115 customers conducted digital transactions.
- ✓ 8.894.361 monetary transactions were recorded on digital channels.
- ✓ The average amount processed was \$12 billion per day.

In addition to growing in usage, we maintained solid performance in transaction execution. Of the total monetary transactions carried out, **90% were successful and 10% were not successfully completed.** For us, this indicator is key because it speaks about the reliability of the channels and, above all, about the peace of mind with which customers can conduct their business.

Breakdown of transactions by customer segment		
Segment	Transactions	Share (%)
Preferred	2.442.670	27%
Select Elite	1.960.121	22%
Preferente Plus	1.878.176	21%
Semi-mass market	1.725.236	19%
Elite	888.158	10%

Lessons Learned and Challenges

The 2025 results send us a clear message: **when we simplify the customer's experience, the digital channel becomes the natural choice.** The growth in sales and transaction volume confirms that we are on the right track, while also showing us where we need to continue refining our approach to make the experience increasingly seamless and consistent.

With these lessons in mind, our focus moving forward is:

- ✓ **Driving more sales across more channels**, with a particular focus on enhancing the **mobile banking** experience, to balance its share of the market with the transactional portal.
- ✓ **Reducing friction in the digital journey** by prioritizing fewer steps, fewer screens, and greater clarity in every customer decision.
- ✓ **Improving transaction effectiveness** by addressing the causes of the **10% of transactions** that are

not completed successfully, to further enhance service reliability.

- ✓ **Personalizing the experience by segment**, understanding needs and usage habits to offer more relevant and timely journeys.
- ✓ **Continue to promote self-service**, freeing up operational time and strengthening support only where it truly adds value.

Customer Satisfaction

For Banco de Occidente, digital transformation only makes sense if it translates into a **clear, seamless, and reliable experience.** That is why we constantly measure how our customers perceive the use of our platforms and use these results as a guide to prioritize improvements, simplify journeys, and strengthen the service.

In 2025, we assessed our customers' satisfaction with our digital platforms using the **System Usability**



Scale (SUS) and observed positive results: the **transactional portal** achieved a rating of **66% / 61%**, while **mobile banking** recorded average scores of **4,4 on iOS** and **4,0 on Android**. Taken together, these results reflect a **largely satisfactory** experience.

Beyond the numbers, **we listen to our customers** to ensure that our technological evolution aligns with their needs. Based on this monitoring, we identified these key points:

- ✓ **Stability in the experience and service:** we have not received recurring complaints that affect digital sales.
 - ✓ **Continuous improvement as a practice:** although the results are positive, we remain focused on evolving and making necessary adjustments to ensure the experience remains simple and consistent.
 - ✓ **Positive signals from Customer Experience:** the team did not report any significant negative feedback that could impact the performance of our platforms, confirming the positive effect of our digitalization initiatives.
- In addition to measuring the experience, **we analyze how our customers are navigating digital channels and which products they choose**, as this also reflects trust and ease of use.
- ✓ **Top-selling digital products:** The best-sellers were **Cuenta Kubo** and **Libre Inversión**, with the latter standing out for its **high conversion rate**, driven

by its flexibility and ease of access.

- ✓ Most active segment: **customers with monthly incomes between \$2 million and \$4 million** were the most active in using digital channels, carrying out **160.683 transactions**. This demonstrates a growing interest in the **convenience and accessibility** these platforms offer to this segment.

Patents, licenses, franchises, trademarks, and other intellectual property rights

As of 2025, for the normal conduct of our operations and those of our subsidiaries, we do not hold any patents, licenses, franchises, or other material intellectual property rights. Where we do focus our attention is on the **management and protection of our trademarks**, as they reflect a significant part of who we are and the trust we build with our customers. That is why we monitor their use, validity, and associated documentation, ensuring consistency across all channels. **During the year, there were no changes in the trademark registrations of the subsidiaries**, and below we present the trademarks that are part of this inventory.

Trademarks applied for and registered in 2025 in the name of Banco de Occidente S.A.

Trademark	Type	Class	Certificate	Validity
OcciAhorro	Registered	36	800611	15/12/2035
Purchase based on plans		36	781975	22/07/2035

Trademarks considered material in the Banco de Occidente transaction:

Brand	Type	Class	Certificate
Banco de Occidente	Mixed	9, 16, 35, 36, 41	SD2023/0068281CO
Blue Diamond	Figurative	9, 16, 35, 36, 41	SD2023/0068268CO
Black Diamond	Figurative	9, 16, 35, 36, 41	SD2023/0068277CO
Supply Factor	Mixed	36	SD2023/0090865CO
Sonora	Sound	35, 36	SD2023/0068262CO

Trademarks considered material in the Banco de Occidente Panama transaction:

Trademark	Type	Class	Application No.
Banco de Occidente (Panamá) S. A	Mixed	36	120087-01



Trademarks considered material in the transaction involving Occidental Bank (Barbados) Ltd:

+	Class	Class	Certificate
Occidental Bank Barbados	Regulations	36	363677

Trademarks considered material in the Fiduciaria de Occidente S.A. transaction

Trademark	Type	Class	Certificate
Fiduciaria de Occidente S.A.	Mixed	36	148217
Fiduciaria de Occidente S.A.	Mixed	35	148224
FiduOccidente Online (the trust company’s Transactional portal of the trust company)	Mixed	35 and 36	544744
Fiduciaria de Occidente S.A. – Mixed (logo with font and color scheme)	Mixed	35 and 36	544620
FiduOccidente (Internet domains Internet)	Mixed	35 and 36	571791

Trademarks considered material in the Sales and Services transaction — NEXA BPO:

Brand	Type	Class	Certificate
Workeando	Mixed	35	577813
NEXA BPO	Mixed	35	716647

Cybersecurity



| SASB FN-CB.230a1 |
SDG 16.10

In 2025, we continue to view cybersecurity as something very simple in essence, though demanding in practice: **safeguarding trust**. Every transaction, every piece of data, and every digital interaction requires us to be vigilant, to anticipate risks, and to respond rigorously when a risk arises. That is why, rather than talking about technology, we talk about a way of working: **prevent, monitor, learn, and strengthen**.

Our management is supported by an **information security framework** that brings together guidelines, practices, and controls to protect our clients’ and the Bank’s information. To stay aligned with recognized best practices, we use international standards such as **ISO 27001:2022, NIST 800–53 (v2.0)**, and local regulations such as the regulatory circulars issued by the Colombian Financial Superintendency regarding compliance with security and cybersecurity controls. We periodically review our approach to adapt it to changes in the environment and the evolution of our digital services.

We also test our capabilities. We complement our internal audit and corporate compliance functions with assessment exercises that help us identify opportunities for improvement and prioritize actions. In recent processes, we shared the results of an external assessment conducted in **2024** with the consulting firm Ernest & Young (EY), and during **2025** we made progress on a new assessment with Deloitte, which was ongoing at the end of the period.

And because security is proven when it is needed most, we have processes and tools to manage cyber risk and an incident response framework designed to mitigate impacts on the **availability, confidentiality, and integrity of our services**. Thus, we continue to strengthen a reliable, responsive, and prepared digital operation, serving our customers and the commitments we have made to our stakeholders.



In 2025, we maintained a governance framework that allows us to make timely decisions, monitor risks, and ensure that security priorities keep pace with the evolution of the business and our digital channels.

Information Security and Cybersecurity Strategy

To ensure that cybersecurity is consistent and sustainable, we manage it with a comprehensive approach: **people, processes, and technology**, under clear supervision and with defined responsibilities. In 2025, we maintained a governance framework that allows us to make timely decisions, monitor risks, and ensure that security priorities align with the evolution of the business and our digital channels.

Our information security and cybersecurity strategy is **led and overseen by senior management, with support from the Vice Presidency of Operations and Technology** and the participation of the **Vice President of Risk** in oversight activities. This approach strengthens coordination between technical and risk management teams and helps us maintain a balanced focus on prevention, business continuity, and customer experience.

Cyber Risk Assessment and Mitigation

Prevention is strengthened when risk is managed in a structured manner. That is why we have a **risk assessment model (ANX-APY-1186)** that identifies threats, probability, and impact on the Bank's assets and services. Based on **residual risk**, we prioritize mitigation actions, assign responsibilities, and track progress using documented matrices. This approach is complemented by our cybersecurity tools, which generate alerts and early warnings to adjust parameters and strengthen controls when the environment demands it.

Our Management

→ We have an **Information Security Committee** that guides, prioritizes, and monitors management in accordance with the NTC-ISO 27001 standard and CE 007 of 2018.

- We conduct **periodic incident monitoring**, with **monthly** internal reviews to assess trends, corrective actions, and opportunities for reinforcement. However, when an event exceeds defined thresholds, it is escalated to the appropriate authorities.
- We promote management based on **continuous improvement**; we not only address events but also analyze lessons learned and strengthen controls to reduce recurrences.
- We define **escalation** mechanisms to ensure that relevant incidents or risks are addressed in a timely manner by decision-makers.
- Priorities and improvement plans are guided by **criticality and risk level**, seeking a balance between security, continuity, and customer experience.

With this governance, we aim to ensure that security is not an isolated effort, but a cross-functional capability that informs our decisions and protects what matters most: our customers' trust and the stability of our services.

To ensure close and effective oversight, cybersecurity has clearly defined responsibilities starting at the executive level.



In our model, leadership comes from the **Vice President of Operations and Technology** and is articulated through specialized roles such as the **Chief Information Security Officer (CISO) / Chief Security Officer (CSO) and the Chief Technology Officer (CTO) / Chief Information Officer (CIO)**, who guide strategy, prioritize actions, and coordinate capabilities to protect information and maintain service continuity. This structure allows us to make timely decisions and maintain cross-functional collaboration across departments, with a focus on prevention, response, and continuous improvement.

Culture of Information Security and Cybersecurity

In 2025, we strengthened our prevention efforts with a simple principle: “**the earlier we identify a risk, the smaller its impact.**” That is why we combine controls, monitoring, and continuous improvements to protect information and maintain the stability of our services. This approach allows us to act before a threat becomes an incident and to support the growth of our digital channels with confidence.

Our **prevention capabilities** are based on three complementary pillars:

1. Information Controls and Protection

We aim to ensure that information is protected throughout its entire lifecycle, from daily use to storage and circulation. To this end, we have strengthened access controls and data leakage prevention measures, with criteria tailored to the sensitivity of the information and the needs of each department.

- **Data Loss Prevention (DLP):** We use a DLP tool (NetSkope) with general policies and area-specific rules.
- **Access Control:** We manage access based on the principle of **least privilege**, leveraging identity and access management (IAM) and privilege access management (PAM) capabilities, as well as role matrices and profiles to ensure authorization with the least privilege for applications. We also have a comprehensive security infrastructure that protects everything from the perimeter to the endpoints.
- **Information classification:** We organize information into **four categories**, allowing us to apply measures commensurate with the level of sensitivity.

- **Scope of sensitive data protection:** Our classification and least-privilege approach is not limited to customer information. It also applies to information regarding **employees, contractors, and third parties**, according to their level of confidentiality. We classify information into four categories (public, internal use, confidential, and restricted confidential) and apply appropriate controls to protect its confidentiality, integrity, and availability.

2. Vulnerability management: identify, prioritize, and remediate

More than just “detecting,” our goal is to **close gaps:** identifying vulnerabilities, prioritizing them based on criticality, and ensuring their resolution through accountability and follow-up.

- We conduct **continuous vulnerability scanning** and generate reports through our specialized team (CSIRT).
- We have a **vulnerability committee** that supports prioritization, the assignment of responsible parties, and follow-up on remediation.

- We have an incident response procedure—CSIRP—that includes a communication and response model for any type of security incident.

3. Intelligence and Monitoring: Staying Ahead of the Curve

We supplement internal controls with environmental monitoring to identify early warning signs and reduce exposure to fraud, impersonation, or unauthorized posts through the analysis of attack vectors.

- We work with a **threat intelligence** provider that monitors mentions of the Bank, potential fraudulent sites, references on the dark web, and indicators that help us anticipate risks and activate preventive measures when necessary.



Operational continuity and preparedness

We know that trust is also built through continuity. That is why, in addition to preventing and responding to incidents, we work to maintain **service availability** and the ability to recover from events that could affect operations. We have contingency and response plans and procedures in place, and we conduct testing exercises on the applications prioritized in the Business Impact Analysis (**BIA**), following the schedule defined for the period.

Culture and Training – Security We Live Every Day

When it comes to cybersecurity, we recognize that while technology is essential, **organizational culture** is the differentiating factor. Throughout **2025**, we strengthened our conviction that security is built through our daily actions, especially when managing emails, protecting credentials, sharing information, and responding swiftly to any warning signs.

Rather than “training just for the sake of it,” we aim for every person at the Bank to understand their role and have practical tools to prevent risks, especially against common threats such as phishing attempts or digital scams.

Here’s how we promoted a culture of security in 2025:

- ✓ We developed awareness-raising initiatives that garnered **5.306 participants** in discussion sessions.
- ✓ We complemented this work with structured training, reaching **6.607 participants** in the virtual information security course.
- ✓ We maintain an **annual awareness plan**, which allows us to reinforce messages, reinforce habits, and update content according to environmental risks.
- ✓ **3 phishing** exercises.
- ✓ **1 Red Team** exercise.
- ✓ **1** cloud-based **cyber-incident** exercise conducted.
- ✓ **12 tips** sent.
- ✓ **21** messages to customers

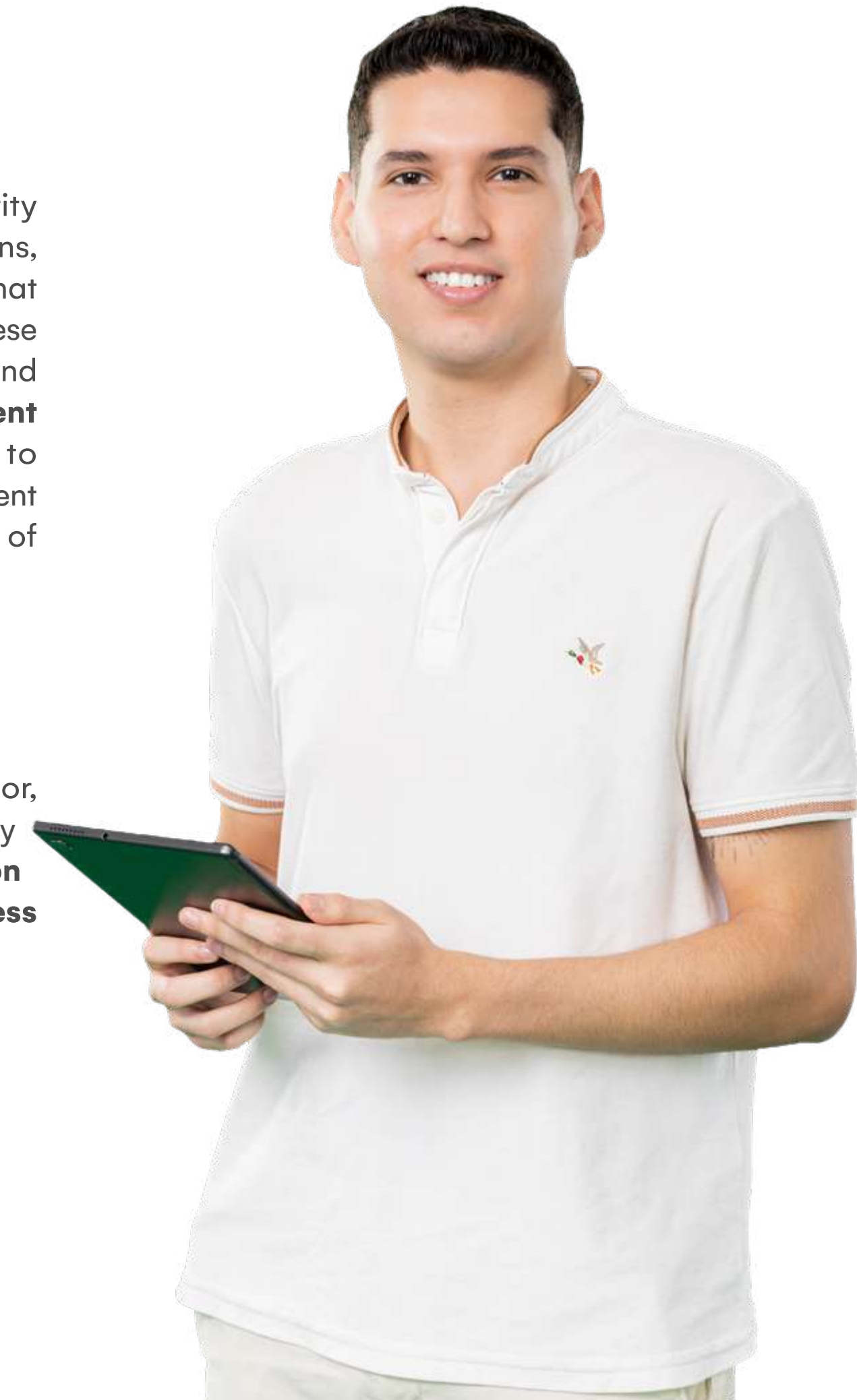
With this approach, we aim to ensure that cybersecurity does not depend solely on controls, but also on an organization that is vigilant, prepared, and committed to safeguarding our clients’ information and trust.

Actions in Response to Non-Compliance and Operational Discipline

Although information security and cybersecurity are not part of employee performance evaluations, we do have internal guidelines and procedures that establish **how to respond to non-compliance**. These mechanisms, aligned with our security policies and incident management **procedures (DLP Incident Response Management Manual)**, allow us to correct **issues**, reinforce responsibilities, and prevent recurrences, maintaining a consistent standard of protection.

Key Cybersecurity Indicators 2025

Our indicators help us understand risk behavior, prioritize enhancements, and maintain the reliability of our channels. In **2025, we tracked prevention efforts, incident response, and the effectiveness of our controls**.





Prevention: Blocked Attacks and Actualized Events

In 2025, our controls (IPS, antivirus, WAF, and email filters) promptly blocked a high number of attack attempts, preventing impacts on operations. This allowed us to avoid any materialized cybersecurity attacks during 2025.

Indicator	2025
Unmaterialized attacks, received from sources (IPS, AV, WAF, email filter).	37.659.071
Successful attacks.	0

Control effectiveness: avoided cost

Based on our internal risk methodology, we estimate the value associated with losses avoided due to the effectiveness of cybersecurity controls.

→ **Estimated avoided cost in 2025:**
\$2.481.161.925 COP.

Cases related to digital fraud and customer management

In addition to prevention, we monitor reports and complaints related to digital security and take proactive measures to provide guidance and respond. In 2025, we achieved the following results:

→ **Complaints regarding digital fraud:** 1.007.

→ **Complaints resolved in favor of the customer:** 358.

→ **Affected account holders (digital fraud):** 1.007.

→ **Average response time:** 15 business days.

Information security breaches

This indicator tracks the trend in the number of incidents classified as information security breaches.

Indicator	2025	2024
Information security breaches.	273	1.292
People affected.	4	3

✓ We **significantly reduced the number of incidents** classified as information security breaches: from **1.292 in 2024 to 273 in 2025**, a reduction of approximately 79%. This suggests a significant improvement in prevention, control, and/or operational discipline regarding these incidents.

✓ **The number of people affected remained at very low levels**, though with a slight increase: from **3 in 2024 to 4 in 2025**. In other words, although there were fewer incidents, we still had isolated cases with an impact on people, which reinforces the need to maintain a focus on controls and daily habits to bring the impact down to **zero**.

In 2025, we faced a significant security incident involving a third party. A Bank supplier was the victim of a double-extortion ransomware attack, which led to the publication of exfiltrated information. Although

the incident originated outside our infrastructure, we activated our management protocols to protect our customers, contain risks, and strengthen controls with a forward-looking, preventive approach.

According to the analysis conducted, the compromised information pertained to customers linked via credit cards: 26,533 cardholders, equivalent to approximately 3% of active individual customers. The exposed information included identification and contact details, such as names, identification numbers, addresses, cities, and departments.

We acted with a priority-based approach to **immediately stop the breach, regain control, and strengthen measures to prevent recurrence**.



Immediate Measures

- We **disconnected direct communication** with the provider and kept it suspended until we could proceed with the validation and certification of security conditions.
- We activated a **crisis management team** to coordinate actions, monitoring, and decisions.

Technical and recovery actions

- We performed a **complete disconnection** of the affected environments, along with **debugging and formatting** processes.
- We implemented enhanced **24/7** monitoring with **EDR** and hardening measures on critical components such as **Active Directory**.
- We performed security reviews and adjustments in cloud environments (**GCP and AWS**), including a review of access and privileged users.
- We have specialized support for forensic analysis and containment, relying on **Lazarus**, and deploy tools such as **Thor and SentinelOne** to strengthen detection and response.

Impact Management and Assurance

- We activated the relevant **policy** and monitored the management fronts associated with the incident.

This event reinforced a priority we uphold as a principle: security is also managed within the Bank's extended ecosystem. Therefore, in addition to responding, we used this learning to **strengthen practices with third parties**, raise verification standards, and consolidate an increasingly resilient digital operation.

Compliance, assessments, and continuous improvement

In 2025, we maintained a cybersecurity approach that combines compliance, monitoring, and learning. For us, protecting information is not just about having controls in place, but about **reviewing, testing, and continuously improving them**, in line with our responsibilities and the trust our customers place in us.

Communication with clients regarding privacy and data protection

For us, transparency is also part of protection. That is why we inform our customers in a timely and clear manner about our **Personal Data Processing Policy**, available for review on the institutional website. Furthermore, when a security incident occurs that could compromise personal data, we activate the necessary mechanisms to **inform potentially affected customers**, in compliance with Law 1581 of 2012 and with a focus on care and timeliness.

Compliance and Regulatory Reference

- Regarding personal data, we conduct our operations in accordance with the provisions of **Law 1581 of 2012**, strengthening practices for the responsible processing of information.
- To guide our model and ensure consistency, we use recognized frameworks such as **ISO 27001:2022 and NIST (v2.0)** as references, which serve as a guide for evaluating and evolving our capabilities, without relying solely on formal certification.

External assessments and monitoring

- We complement our self-management with evaluation exercises: in **2024**, we shared the results of an **external evaluation** conducted by EY.
- In **2025**, we made progress on an assessment with Deloitte—which was **still ongoing** at the end of the period—as part of our effort to understand our **level of maturity, prioritize gaps, and strengthen action plans**.





Critical third parties:
compliance verification

→ Although we do not conduct third-party vulnerability assessments using the Bank’s own tools, we do conduct **compliance verification visits** to critical third parties in information security and cybersecurity, with support from **Incocrédito**, including questions related to **vulnerability management**.

Lessons Learned and
Challenges

In 2025, we confirmed that cybersecurity is a capability built every day through clear governance, prevention, culture, and timely response. The year’s indicators reflect ongoing efforts to strengthen our capabilities, and the incident involving a third party also provided lessons for us to continue raising standards and reinforcing controls across our entire ecosystem.

Looking ahead to 2026, our focus is on:

- Continuing to consolidate prevention and early detection, prioritizing critical services and assets.
- Strengthening management of third parties, raising requirements and verifications where applicable.
- Continuing to promote a practical and accessible security culture for all teams.
- Maintaining a reliable and available digital operation that protects our customers’ information and experience.

Customer Privacy

| GRI 418-1 |

At the Bank, we understand that privacy is an essential part of the trust we build every day with our customers. That is why we handle personal information responsibly, establishing clear rules for its use and promoting best practices throughout the organization. More than just meeting a requirement, we strive to ensure that every interaction—whether through physical or digital channels—reflects respectful, secure, and consistent data handling, acting with transparency and promptness when requests or complaints arise.

Complaints Received
Regarding Privacy and Data
Handling in 2025

In 2025, we followed up on situations reported by our customers regarding privacy and the processing of personal data.

- **Privacy violations: 0** complaints received.
- **Mismanagement of personal data: 703 complaints**, primarily related to **corrections of our customers’ personal data**.

When we receive a case, we take a **solution- and learning-oriented** approach:

- **We verify** each reported situation and **resolve the root cause**.
- **We strengthen processes and responsibilities** in the relevant areas to prevent recurrence and improve the experience.

Data breach incidents

In addition to following up on complaints, we monitor and report incidents involving personal data, including data breaches, information loss, or unauthorized access.

Indicator	2025	2024	2023	2022
Total number of data breaches identified during the reporting period.	1	1	0	1
Percentage of data breaches in which personally identifiable information (PII) was the subject of the data breach.	100%	100%	0%	100%
Total number of unique account holders affected by data breaches, including all those whose personal data was compromised in a data breach.	26.533	29	–	4.000
Total number of complaints received from regulatory bodies.	9	4	7	7



In 2025, we recorded the same number of **identified data breaches** as in 2024 (**1 case** in each year). However, the impact was significantly greater: the number of **unique affected individuals rose from 29 (2024) to 26.533 (2025)**, indicating that while the frequency did not increase, the magnitude of the event was higher.

In both years, **100%** of the breaches involved **personally identifiable information (PII)**, so the focus was on strengthening controls and response capabilities for this type of exposure. Additionally, in 2025 there was an increase in **complaints received from regulatory bodies, rising from 4 (2024) to 9 (2025)**, suggesting a higher level of oversight and associated requirements during that period.

Privacy Risk Management Strategies

In 2025, we continued to strengthen these capabilities to protect our clients' and the Bank's data, anticipate potential exposures, and ensure consistent handling according to the level of confidentiality.

To reduce the risk of data breaches, we use a **Data Loss Prevention (DLP)** tool—NetSkope—which operates through both general and area-specific policies and rules. This is complemented by ongoing efforts from the security team, including a continuous awareness program that incorporates **information protection based on confidentiality levels**, reinforcing best practices in day-to-day operations.

We complement these measures with access controls designed to ensure that each person has only the permissions necessary for their role. Our applications are based on **role and profile matrices**, following the principle of **least privilege**, to strengthen authorization and reduce the risk associated with unauthorized or unnecessary access.

When situations related to privacy or data security arise, we act according to defined protocols. We have an **incident response procedure (CSIRP)** that establishes a communication and response model to address any type of security incident in an orderly and timely manner, including those that may involve personal information.

Approach to identifying and addressing data security risks.	
Approach	Description
Vulnerability Identification	We have a tool that continuously scans devices and provides real-time information regarding vulnerabilities. We receive reports from the financial CSIRT and the corporate CSIRT regarding emerging infrastructure vulnerabilities associated with the entities.
Addressing risks and vulnerabilities	There is a vulnerability committee where the information gathered in the previous point is shared and provided to the infrastructure team for remediation

Threat Analysis

- **Analysis of new or emerging threats:** We have a provider that continuously monitors the Bank's name online to detect potential fraudulent sites, customer information exposed on dark web forums, and indicators of compromise associated with recent vulnerabilities and new threats. Criteria analyzed: NFC payment systems, mobile banking, and web-based banking.
- **Attack vector analysis:** We have perimeter-level and device-level tools that control incoming requests and help minimize the risk of attacks such as DoS, phishing, ransomware, and malware. Criteria analyzed: ransomware, loan accumulation phases, money fine scams, and remote access attacks.



Responsible supply chain management

| GRI 2-6; 204-1; 308-1; 414-1 |

Our suppliers are key partners in sustaining our operations and delivering reliable service. Therefore, in addition to managing procurement, we seek to build long-term relationships based on transparency, compliance, and continuous improvement, incorporating clear expectations regarding environmental, social, and integrity issues.

In 2025, we continue to view our supply chain as an extension of our approach to banking: what we buy, who we buy from, and how we build those relationships also reflect our values. That is why we work to ensure that our supply is responsible, transparent, and sustainable, safeguarding operational continuity while promoting best practices among our suppliers.

Our management focuses on three complementary priorities:

- **Long-term, close relationships:** We seek suppliers who partner with us based on quality, compliance, and trust, and we strengthen these ties through dialogue and training.
- **Environmental and social criteria in supplier management:** We assess our suppliers' performance on environmental and social/labor issues to identify gaps and opportunities for improvement.
- **Ethics and respect for human rights:** We promote clear expectations regarding integrity, responsible practices, and compliance to protect people and strengthen a value chain consistent with our commitments.

With this approach, we do more than just manage procurement; we build partnerships that contribute to the country's development, strengthen our operations, and help us advance our sustainability agenda with greater consistency.

Proportion of spending on local suppliers

In our procurement management, prioritizing local suppliers also means strengthening local capacities and making operations more efficient. In 2025, **99% of our suppliers** were concentrated in the country's major cities: **Bogotá, Cali, Medellín, and Barranquilla**, reflecting a predominantly domestic supply network with a presence in strategic hubs for the Bank.

Spending Proportion	2025	2024	2023	2022
% of budget allocated to local suppliers	48%	59%	59%	57%
% Percentage of local suppliers	99%	99%	98%	99%
Total Bank Budget	\$2.585.026.552.247	\$2.379.346.896.871	\$2.105.258.462.373	\$1.856.652.119.558
Total payment to local suppliers	\$1.244.338.492.959	\$1.247.997.144.780	\$1.249.753.622.658	\$1.065.100.878.818

- ✓“Local” refers to **Cali**, the city where our **main administrative headquarters** is located.
- ✓“Significant operational locations” such as **Bogotá**, as it is the main city from which **payments to suppliers** are made.



Environmental and Social Assessment of Suppliers

In 2025, we strengthened our environmental and social assessment of suppliers as a practical way to understand their level of maturity and, above all, to identify opportunities for joint improvement. To do so, we started with our universe of suppliers to whom payments were made during the year and conducted a diagnostic survey, which allowed us to establish a baseline comparable to previous years.

During the period, we had 800 suppliers with payments, of which 784 were domestic and 16 were foreign. As part of the assessment, we conducted a structured outreach to corporate suppliers and received 454 responses, representing a 56.75% participation rate in the exercise. This result provided us with insight into environmental practices (such as management, carbon footprint, mitigation, and efficiency initiatives) and social/labor practices (well-being, community contribution, and human rights), and allows us to more effectively guide training and support initiatives.

Suppliers with payments in 2025

Concept	Amount
Total suppliers (Includes individuals, legal entities, and foreign entities).	800
Foreign suppliers.	16
Domestic suppliers.	784
Survey responses.	454

As shown in the time series, in 2025 the percentage of suppliers that “passed” selection filters based on **environmental and social** criteria was **56,75%**, compared to **78% in 2024 and 50% in 2023** (2022: N/A). In terms of volume, this corresponds to **454** suppliers in 2025, compared to **547 in 2024 and 349 in 2023**. This information not only demonstrates the traceability of the process but also helps us focus our efforts on expanding participation and strengthening capabilities, especially with the goal of increasing the scope of the assessment by 2026.

Assessment	2025	2024	2023	2022
% of suppliers that have passed selection filters based on environmental criteria	57%	78%	50%	N/A
# of suppliers that have passed selection filters based on environmental criteria	454	547	349	N/A
% of suppliers that have passed selection filters based on social criteria	57%	78%	50%	N/A
# of suppliers that have passed selection filters based on social criteria	454	547	349	N/A

Environmental Assessment

In 2025, we took an important step toward better understanding our suppliers’ starting point in environmental matters. Rather than simply “setting requirements,” we sought to build a clear picture of their level of maturity and, from there, identify opportunities for strengthening and support.

For this analysis, we used **suppliers with payments scheduled for 2025** as our baseline and conducted a survey of **corporate suppliers** with nationwide coverage, including foreign suppliers.

Scope

- ✓ **Total number of suppliers with payments:** 800 (includes individuals, legal entities, and foreign suppliers).
 - ✓ **Domestic suppliers:** 784
 - ✓ **Foreign suppliers:** 16.
 - ✓ **Suppliers surveyed:** 654.
 - ✓ **Responses received (total surveyed):** 454, equivalent to a response rate of 56,75%
- The environmental survey allowed us to gather information on key management elements, such as:
- ✓ **Comprehensive environmental management strategy.**
 - ✓ **Carbon footprint measurement.**
 - ✓ **Mitigation and offset initiatives.**
 - ✓ **Consumption reduction** (energy, water) and reuse initiatives.





With these results, we strengthened our understanding of the current state of environmental implementation in the supply chain and established a foundation for continuing to raise standards, prioritizing training and collaboration with suppliers.

Social and Labor Assessment

In parallel with the environmental component, in 2025 we also strengthened our social focus on the supply chain. This assessment helps us understand how our suppliers manage labor and human rights issues and identify gaps where we can provide training and support.

We conducted a survey of **corporate suppliers** with payments in 2025, focused on social and labor issues, with questions related to:

- ✓ **Community contribution plans** and engagement with the local community.
- ✓ Actions for the **development and well-being of their employees**.
- ✓ Existence of statements, policies, processes, and/or practices related to **human rights**.

During the process, we received 454 responses, representing a 56.75% participation rate, which provided us with a baseline of the current state of implementation of social and labor practices among a representative portion of our supplier base.

In addition, we took a significant step from an institutional standpoint: we developed and published our Human Rights Policy, which establishes principles and commitments to protect, respect, and remedy. As part of the onboarding or engagement process, our suppliers must confirm that they are aware of and accept this policy, reinforcing clear expectations throughout our value chain.

Capacity Building and Supplier Engagement

We believe that a responsible supply chain is built not only through assessments but also through support. That is why, in 2025, we complemented our assessments with training and networking opportunities that help suppliers strengthen key practices and align with the Bank's commitments.

During the year, we conducted **7 training sessions** for suppliers, focused on topics that contribute to transparency, a culture of compliance, and responsible management:





- ✓ ABAC (anti-corruption and bribery).
- ✓ Gender equality.
- ✓ SAC — Financial Consumer Ombudsman.
- ✓ SARLAFT.
- ✓ Benefits for the Business Community — Labor Reform 2025.
- ✓ Innovation: Brand Manual.
- ✓ Cybersecurity.

In addition, we create opportunities to strengthen relationships and bring together stakeholders around best practices. One example was **ECOS, our Sustainability Summit**, which sought to connect clients, suppliers, partners, Planeta Azul winners, foundations, and NGOs, fostering conversation, learning, and community.

Goals, Challenges, and Opportunities

In 2025, we made progress in consolidating a more structured sustainable procurement program, with assessments and training as key tools. At the same time, we identified challenges and opportunities that set the course for us to continue strengthening responsible supply chain management in 2026 and in the medium term.

2025 Achievements

- ✓ **Supplier maturity assessment** (Government, Social/Labor, Environmental, and Diversity): we surveyed **57,08%** of a sample of **797 suppliers**, establishing a baseline of their current status.
- ✓ **Increased participation in training and events:** We held **7 training sessions**, prioritizing key topics related to compliance, culture, and responsible management.

2026 Goals and Progress Horizon

By 2026, we aim to continue conducting the assessment as an annual practice and expand its scope:

- ✓ Repeat the maturity assessment in the areas of **Government, Social/Labor, Environment, and Diversity**, increasing participation.
- ✓ As a one-year goal, we aim to **survey 90%** of the suppliers in the sample of 800.
- ✓ Expand the training agenda to include additional topics such as the **environment, corporate governance, diversity, equity and inclusion, financial literacy, human rights, and innovation**.

Identified Challenges

- ✓ **Align the sustainable procurement program** with the strategic objectives of the Procurement Synergy Center, incorporating criteria prioritized by each **UNSPSC** category.
- ✓ Develop a **Supplier Summit** as a platform to consolidate our suppliers as strategic partners, drive sustainable practices, promote operational excellence, and open up business opportunities.

Opportunities to strengthen the program

- ✓ Design and implement **differentiated training pathways** for user departments and procurement staff, establishing a **Sustainable Procurement School** with feedback sessions.
- ✓ Define a plan to ensure supplier participation in measuring carbon footprints for **Scopes 1 and 2**, strengthening the quality and comparability of environmental information in the supply chain.

Sustainability:

Creating Shared Value





ESG Strategy and Its Impact



SDG 8.5; 9.3; 13.2
| GRI 2-23 |

At Banco de Occidente, sustainability is an essential part of our operation and the way we do business. Through the Sustainability Department, we coordinate efforts with all areas of the organization to ensure that the Bank’s activities generate positive change in the environment and among our stakeholders.

Our environmental, social, and governance (ESG) vision goes beyond regulatory compliance; we seek to strengthen institutional resilience through a conscious balance between financial performance and social and environmental impact. To ensure the integrity of this approach, we have a robust governance structure: the Board of Directors exercises active and regular oversight of the ESG strategy, ensuring its alignment with the Bank’s integrated risk management and long-term objectives through its specialized committees.

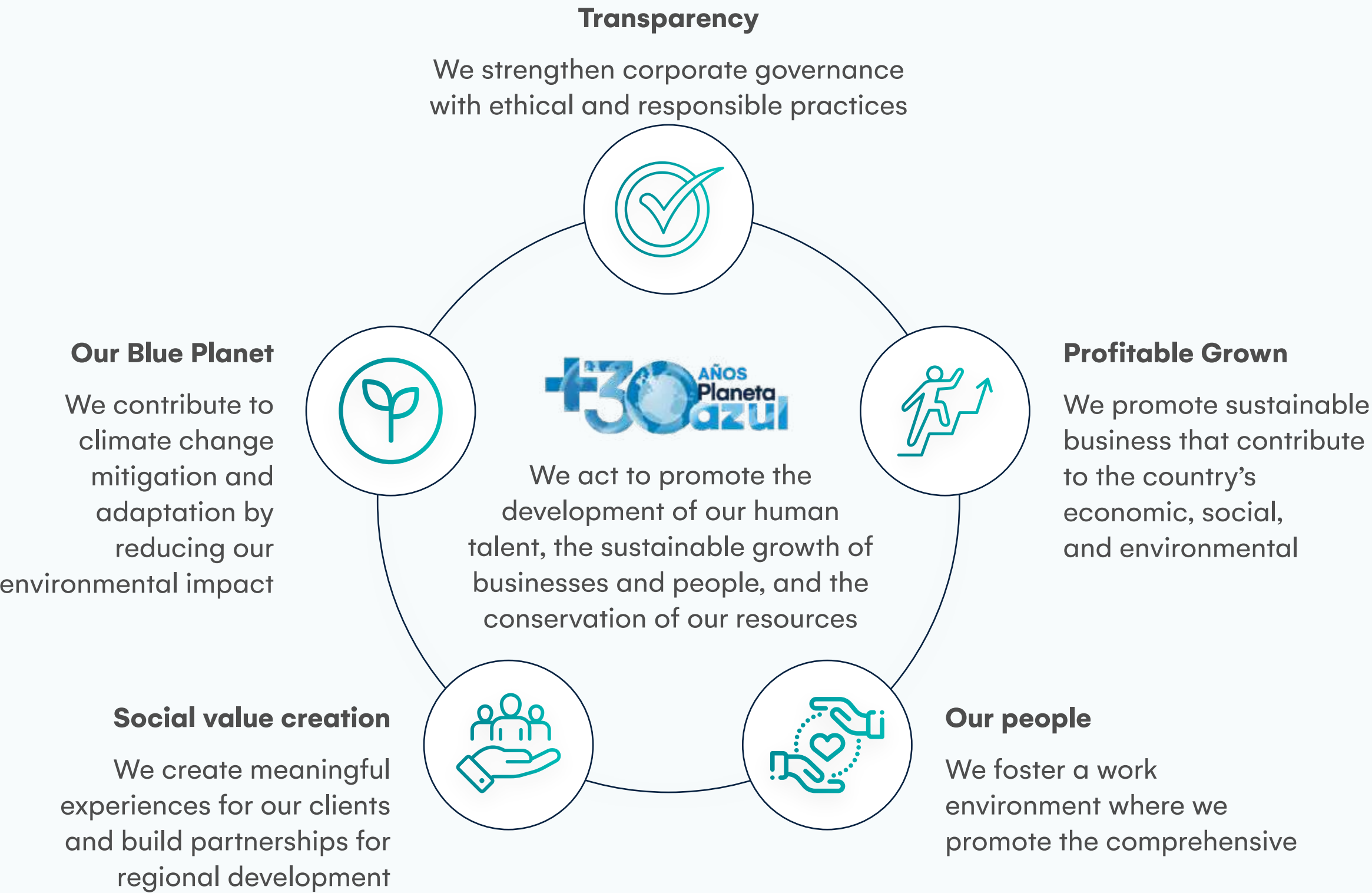
Our sustainability strategy

Our vision is embodied in a corporate strategy that positions sustainability as a cross-cutting pillar across all our business lines. By integrating ESG criteria, we strengthen our ability to interpret the environment, identify responsible business opportunities, and consolidate a management model aligned with regulatory frameworks and international best practices.

In 2025, we evolved this approach through a dual materiality analysis, designed to strengthen the link between sustainability and the Bank’s strategic and financial planning. This exercise not only allowed us to prioritize initiatives and adjust objectives but also optimized the allocation of resources toward the issues with the greatest impact on the organization and its stakeholders.



Our Strategy



Thanks to this evolution, materiality results have become a strategic input for comprehensive management. Their technical application in project evaluation, the development of financial solutions, and risk management enhances long-term financial performance and strengthens our ability to generate sustainable value.



Alignment with the Sustainable Development Goals (SDGs)

Our ESG strategy aligns with the United Nations Sustainable Development Goals (SDGs) as a reference framework to guide our management and the Bank’s contribution to the country’s sustainable development. This alignment allows us to integrate economic, social, and environmental considerations into decision-making and ensure consistency between our strategy and the initiatives we develop at the Bank.

In line with what was defined in the 2024 Management and Sustainability Report, we maintain our focus on the prioritized SDGs where, given the nature of our financial activities, we can generate the greatest impact. In this regard, our strategy contributes primarily to SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation, and Infrastructure), and SDG 13 (Climate Action), which are integrated across the board into our business decisions, risk management, internal operations, and the development of sustainable financial solutions.

Complementarily, we contribute to other SDGs through initiatives related to ethics and governance, talent management, diversity and inclusion, customer experience, and community engagement.





Materiality Analysis

| GRI 2-29; 3-1; 3-2; 3-3 |

At Banco de Occidente, materiality analysis is a key tool for guiding our sustainability strategy and ensuring that our decisions consistently address the impacts we generate and the risks and opportunities that may affect business performance. This exercise allows us to prioritize the most relevant ESG issues, focus our efforts and resources, and strengthen value creation in the short, medium, and long term.

A strategic approach based on double materiality

In 2025, we updated our materiality analysis by incorporating a more in-depth approach to double materiality, in line with the frequency established by the Bank for this exercise, which is conducted every two years. **This update built on the analysis conducted in 2023** and enabled us to conduct a structured review of the most relevant ESG issues within the current business and environmental context. This analysis allows us to align the sustainability strategy with the Bank’s organizational purpose

by providing a comprehensive view of the issues requiring priority attention. Through the analysis of impacts, risks, and opportunities, we identified those issues that, due to their relevance to the environment and their potential financial impact, can significantly influence business continuity and long-term value creation.

The double materiality update was developed with the support and verification of a specialized external entity, and the **results were reviewed and approved by the Bank’s senior management and the Board of Directors as the highest governing body**. Based on this approach, double materiality is established as a key tool for guiding decision-making and prioritizing actions.

Double Materiality Analysis Process

The determination of double materiality at Banco de Occidente was carried out through a structured and progressive process, which allowed us to identify and prioritize the most relevant ESG issues from the perspectives of impact and finance. This process integrates historical analysis, external information, internal insights, and strategic criteria, ensuring consistency with business management and stakeholder expectations.

To carry out this exercise, we aligned our analysis with the main regulatory frameworks and international standards regarding sustainability and corporate

disclosure. Specifically, we took into account the guidelines of the Global Reporting Initiative (GRI) Standards, especially GRI 2 and GRI 3; International Financial Reporting Standards (IFRS) S1 and S2 of the International Sustainability Standards Board (ISSB); the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD); and the sector-specific criteria of the Sustainability Accounting Standards Board (SASB). We also consider international regulatory developments related to the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), as well as the applicable national regulatory guidelines issued by the Colombian Financial Superintendency (SFC).

This analysis allows us to **connect the sustainability strategy with the Bank's organizational purpose**, by offering a comprehensive view of the issues that require priority attention.





1. Starting point and strategic continuity

- Technical review of the 2023 materiality analysis to ensure traceability.
- Validation of previous issues, ensuring that the adjustments made respond to changes in the environment.
- Incorporation of historical results to maintain comparability and strengthen the robustness of the new analysis.

2. Preliminary refinement and prioritization of issues

- Grouping of key topics to avoid duplication and improve clarity in management.
- Identification of a preliminary list of ESG topics aligned with the Bank's current context and trends in the financial sector.

3. Analysis of the global context and environment

- Assessment of emerging regulatory frameworks, international standards, and market dynamics.
- Identification of impacts, risks, and opportunities in suppliers, proprietary operations, and the investment portfolio.

4. Multidimensional diagnosis (internal and external)

- Capturing the expectations and needs of key external stakeholders.
- Involvement of senior management and strategic areas to integrate business knowledge.
- Joint analysis of the Bank's impact on the environment and financial materiality (the environment's impact on the Bank).

5. Consolidation and final prioritization

- Cross-referencing of internal and external results to define the criticality of each issue.
- Development of the dual materiality model.
- Definition of material issues that guide ESG strategy and risk management.
- Validation and approval of material issues by Senior Management and the Board of Directors, ensuring their integration into decision-making.

This exercise allows us to prioritize the most relevant ESG issues, **focus efforts and resources, and strengthen value creation in the short, medium, and long term.**





Impact materiality

Impact materiality identifies both the positive and negative effects that the Bank's activities have **on the environment and society**. This "inside-out" analysis assesses how our operations, products, and decisions influence people and the environment, serving as the foundation for our strategies for prevention, mitigation, and the creation of sustainable value.

For this exercise, we conducted a structured assessment that included a review of Impacts, **Risks, and Opportunities (IRO)** across our value chain (suppliers, operations, and portfolio). The analysis incorporated information from 147 companies in key sectors, applying technical criteria of magnitude, scope, and remediability.

As a result, **125 IROs** were prioritized with the following distribution:

- **Environmental Dimension (29 IROs)**: Focused on emissions management, climate change, eco-efficiency, and biodiversity.
- **Social Dimension (48 IROs)**: Focused on customer experience, talent management, diversity, human rights, and community.
- **Governance Dimension (48 IROs)**: Related to ethics, cybersecurity, supply chain management, and sustainable finance.

Financial Materiality

Complementarily, financial materiality assesses how ESG factors in the environment **influence the Bank's value and financial performance**. This "outside-in" analysis identifies the risks and opportunities that may affect our profitability, solvency, competitive position, and resilience in the short, medium, and long term.

Under this approach, we analyze ESG issues based on their impact on critical variables such as **credit, operational, reputational, and regulatory risk**. This process integrated global trends and regulatory frameworks with the strategic vision of internal departments to identify areas of vulnerability or business potential.

The results of this perspective enable the Bank to anticipate emerging risks and guide the design of financial solutions aligned with the creation of economic value. Thus, financial materiality ensures that sustainability is fully integrated into **financial planning and strategic decision-making**.

Stakeholders

Our stakeholders are a central component of sustainability and identifying issues requiring priority attention. Through ongoing and structured engagement cycles, we seek to understand their expectations, identify relevant risks and opportunities, and strengthen decision-making aligned with the context in which the Bank operates.

As part of the update to our double materiality analysis, we incorporated the internal perspectives of key vice presidents at the Bank, which allowed us to enhance the identification and prioritization of ESG issues from a strategic and business perspective.



Prioritized Stakeholder Groups

In the materiality assessment and in our ongoing management, we consider the following prioritized stakeholders:



Shareholders



Customers



Senior management



Board of Directors



Employees



Communities



Strategic Partners



Suppliers



Associations

These groups represent the stakeholders with the greatest level of influence and/or impact regarding the Bank's activities and the impacts resulting from its operations and strategic decisions.



Engagement with stakeholders and its connection to materiality

Our engagement with stakeholders takes place through various channels and dialogue mechanisms, tailored to the nature of each group and the type of interaction. This engagement allows us to gather insights, expectations, and signals from the environment that are key to responsible business management.

The inputs derived from this dialogue, together with the internal perspective of the strategic areas, are integrated into the updated double materiality analysis as a fundamental element for identifying and prioritizing the most relevant ESG issues. In this way, stakeholders help strengthen impact materiality by reflecting the effects of our activities on the environment, and financial materiality by highlighting issues that may affect the Bank's performance, reputation, and sustainability.

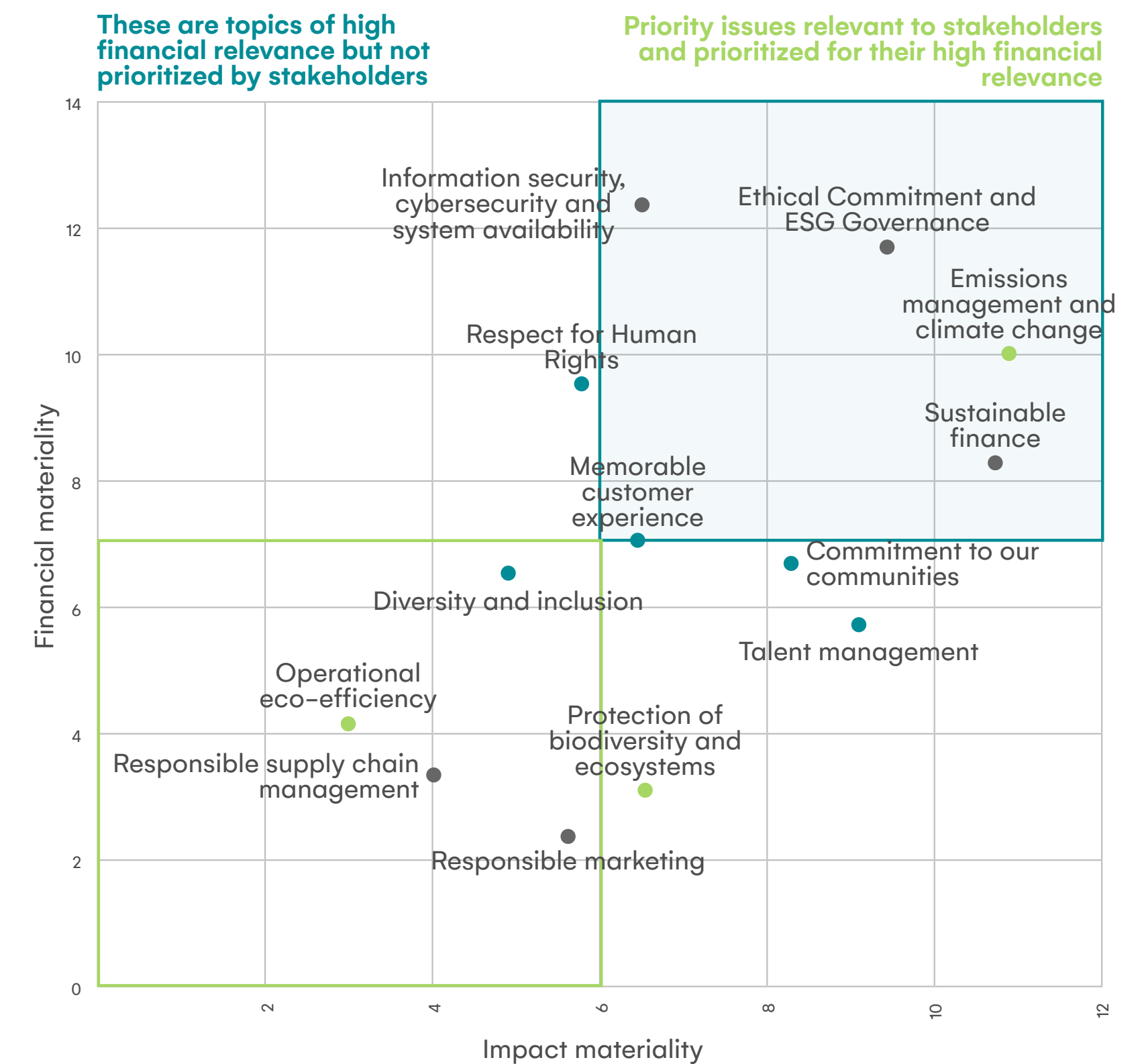


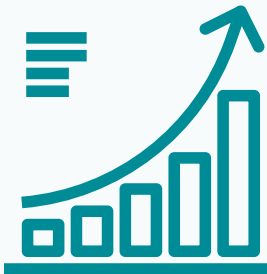
Material issues guiding our ESG strategy

Below, we present the prioritized material issues and their level of relevance, which constitute a key input for guiding strategic decision-making, risk and opportunities management, and the design of initiatives aligned with the creation of sustainable value in the short, medium, and long term.

Dimension	Issues
Critical	
Environmental	Emissions Management and Climate Change
Social	Memorable Customer Experience
Government	Sustainable Finance
Governance	Ethical Commitment and ESG Governance
Governance	Information security, cybersecurity, and system availability
Priorities	
Social	Respect for human rights
Social	Talent management
Social	Diversity and Inclusion
Social	Commitment to Our Communities
Relevant	
Environmental	Operational eco-efficiency
Environmental	Protection of biodiversity and ecosystems
Governance	Responsible marketing
Governance	Responsible supply chain management

Double materiality matrix





Material issues for creating corporate value

Material issues for creating corporate value reflect the issues that have a direct impact on the Bank’s financial sustainability, competitiveness, and resilience. These issues integrate the ESG perspective into the business strategy and guide the management of risks and opportunities across different time horizons.

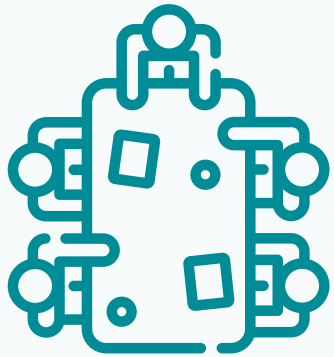
Material issue	Emissions Management and Climate Change	Talent management	Information security, cybersecurity, and system availability
Risk or opportunity	Emissions management and climate change are critical issues that may impact the Bank’s long-term performance, given evolving regulations and physical changes in environmental conditions. In this context, resilience and the transition to a low-carbon economy entail risks , such as the portfolio’s exposure to carbon-intensive assets in the face of stricter regulations and potential losses resulting from physical climate events. At the same time, they represent opportunities associated with attracting new capital flows by financing transition projects and sustainable assets through existing products.	Talent management is a critical factor in maintaining the Bank’s competitiveness, innovation capacity, and service quality. In this context, attracting, developing, and retaining employees with the right skills represents a strategic opportunity , as it enables the building of a specialized, innovative workforce aligned with the long-term strategy. Conversely, high turnover, skills gaps, or low employee engagement can generate operational, reputational, and performance risks , reflected in the loss of intellectual capital and higher operating costs associated with talent management.	In an environment of increasing digitalization within the financial sector, exposure to cyber threats, operational failures, and risks associated with system availability is rising, all of which can impact business continuity, reputation, and regulatory compliance. Given this context, robust management of these aspects represents a strategic opportunity to strengthen operational resilience, build customer trust, and differentiate the Bank through solid digital capabilities. However, inadequate management can lead to risks such as operational disruptions, regulatory penalties, and reputational damage associated with security incidents or system failures.
Business Case	Resilience in the face of vulnerability to natural hazards and the transition to a low-carbon economy present significant opportunities, such as financing sustainable projects and assets and supporting clients interested in green products. At the same time, it presents risks associated with increasingly stringent regulations, shifts in market preferences, and the potential obsolescence of assets not aligned with environmental criteria. Properly managing these risks and opportunities allows us to reduce costs associated with regulatory non-compliance, strengthen business resilience, and position ourselves as a responsible entity committed to climate-compatible development.	Human talent is a fundamental driver of our operational efficiency and the experience we offer our customers. Investing in the training, development, and well-being of our employees strengthens their capabilities, reduces turnover, and improves productivity . Furthermore, having well-prepared and committed teams facilitates adaptation to changes in the environment, innovation in products and services, and the effective execution of the Bank’s strategy.	Information protection and service continuity are essential to ensuring efficient and reliable operations. Having secure and available systems allows us to offer financial products and services that are accessible, efficient, and aligned with customers’ expectations. Furthermore, proper cybersecurity management helps reduce operational and legal risks, protect information assets, and ensure compliance with regulatory requirements applicable to the financial sector.
Business Impact	Integrating emissions management and climate change into the business strategy helps mitigate financial and operational risks, strengthening the business’s resilience in the face of regulatory changes and environmental conditions. This approach reinforces the Bank’s reputation as a responsible institution and supports value creation through more efficient portfolio and risk management , as well as strong relationships with stakeholders, contributing to the Bank’s long-term stability and sustainability .	Effective talent management translates into better organizational performance, greater operational stability , and more consistent service for our customers. Strengthening internal capabilities promotes business continuity, improves process efficiency, and reinforces a positive reputation as a responsible employer.	Effective management of information security and cybersecurity strengthens business continuity , operational stability, and customer confidence in our services. This approach reduces exposure to operational disruptions and regulatory penalties, protects the Bank’s reputation, and reinforces its ability to operate efficiently in increasingly demanding digital environments , generating sustainable value over the long term.
Business Strategies	We are implementing a comprehensive strategy to manage emissions and climate change in our operations and financing, which includes incorporation of environmental criteria into credit decisions and alignment with international frameworks and standards. As part of this effort, in 2025 we launched a project with a specialized consultant to deepen the analysis of our financed emissions, expand the scope of their measurement, and lay the groundwork for setting targets starting in 2026. Complementarily, we are making progress in integrating climate risks into our risk management system, supporting regulatory compliance and aligning the Bank’s decisions with sustainability goals .	We have developed initiatives aimed at strengthening talent management, including training and development programs, well-being, leadership, and capacity-building , as well as actions to promote diversity, inclusion, and a positive work environment. These strategies are aligned with the Bank’s vision and seek to ensure that our employees have the necessary tools to contribute to the achievement of strategic objectives and the creation of sustainable value.	Our strategy is focused on strengthening information security, cybersecurity, and system availability through the implementation of controls, processes, and technologies that protect data and ensure operational continuity . These actions include strengthening technology risk management, continuously updating security capabilities, and adopting best practices that allow us to anticipate threats, respond promptly to incidents, and ensure the availability of our services..



Materiality metrics for creating business value

Materiality metrics allow us to track how material issues are integrated into the Bank’s strategy and into the risk and opportunity management, contributing to alignment between performance, decision-making, and business sustainability.

Material issue	Emissions management and climate change	Talent management	Information security, cybersecurity, and system availability
Objective / Metric	Our objective is to advance the reduction of carbon emissions from the loan portfolio by 2030, as well as to strengthen financing for projects/assets that drive the transition to a low-carbon economy and climate resilience. In this regard, the Bank has set a goal to finance COP 8 trillion in sustainable projects/assets between 2024 and 2030, aligned with environmental and climate criteria.	Our objective is to strengthen talent management to improve organizational performance, operational efficiency, and customer experience. In this regard, the Bank has set goals to achieve a 93% employee satisfaction rate by 2025, based on the results of workplace climate surveys, as well as to increase employee participation in training programs, with the aim of reaching 83% training coverage by 2025.	Our objective is to strengthen information security, cybersecurity, and system availability to ensure business continuity, protect the information of customers and other stakeholders, and maintain trust in the Bank’s services. In this regard, we seek to advance the digitization of operational processes by 2030 , as well as to consolidate robust management of the technological and cybersecurity risks associated with operations.
Target year	The target date for achieving these objectives is 2030 , considering both the reduction of emissions associated with the portfolio and the growth of the sustainable financing portfolio.	The target date for achieving these objectives is 2025 , both for employee satisfaction levels and for participation in training and development programs.	The target date for achieving these objectives is 2030 , taking into account process modernization, system availability, and the strengthening of information security controls.
Progress	In 2025, we made progress in measuring carbon emissions, initiating technical work with a specialized consultant to review financed emissions and adjust the methodology and scope in line with the standards of the Partnership for Carbon Accounting Financials (PCAF). This process forms the basis for future emissions tracking; therefore, the results obtained in this exercise are not comparable to previous measurements. Regarding the financing of sustainable projects/assets, the Bank has reached a cumulative total of COP 4,5 trillion, compared to the overall target of COP 8 trillion set for 2030.	These metrics are monitored periodically based on the results of internal surveys and training indicators. In 2025, the results show a 95% employee satisfaction rate, enabling the achievement of the workplace environment goal. Regarding training, approximately 80% of employees have completed the training programs planned for 2025, reflecting the achievement of the current goal.	To date, the Bank has successfully digitized a significant portion of its operational processes, gradually advancing toward the objective set for 2030. These advances reflect increased adoption of technological channels and platforms, as well as the strengthening of operational efficiency and digital capabilities that support business continuity and the customer experience.
Executive Compensation	Compensation for Senior Management at Banco de Occidente incorporates criteria linked to strategic performance and the management of risks relevant to the business, including environmental, social, and governance (ESG) aspects. This approach aligns the decision-making of the Bank’s leaders with strategic objectives, business sustainability, and long-term value creation. In 2025, incentive schemes incorporated criteria linked to prioritized material issues, consistent with the ESG strategy and the results of the double materiality analysis. Specifically, elements related to talent management and development, emissions management and climate change, and information security, cybersecurity, and system availability were integrated into the evaluation of senior management’s performance. These criteria were applied through indicators related to leadership and capacity building, the management of climate risks and opportunities, and operational continuity and information protection. The design and implementation of the compensation scheme were reviewed by internal governance bodies, in line with the Bank’s control and oversight framework.		



Material Issues for External Stakeholders

Material issues for external stakeholders reflect the issues that are most relevant to the groups with which the Bank interacts outside its organizational structure. These issues capture the expectations of the broader community and help guide the Bank's management, communication, and actions in a manner consistent with its role in the country's economic, social, and environmental development.

Material issue	Emissions management and climate change (Environmental impact)	Financial inclusion and access to financial services for women-led SMEs (Social impact)
Cause of the impact	The Bank's financing activities can generate both positive and negative impacts on greenhouse gas emissions, depending on the type of projects and sectors financed. On the one hand, financing carbon-intensive activities, particularly in sectors such as energy, infrastructure, and construction, can contribute to increased emissions and, if not properly managed, exacerbate the effects of climate change, generating adverse impacts on people, society, and the environment. On the other hand, financing projects and assets related to renewable energy, energy efficiency, and transition solutions contributes positively to decarbonization and energy security, supporting climate change mitigation and progress toward a low-carbon economy. This dual effect makes climate change management a central aspect of materiality analysis from an environmental perspective.	The Bank's activities in providing financial products and services can have both positive and negative impacts on financial inclusion and the development of small and medium-sized enterprises (SMEs), particularly those led by women, who often face greater barriers to access. On the one hand, the lack of a credit history, biases in risk assessment, and limited access to financial information can restrict these businesses' access to financial services, exacerbating social and economic inequality and limiting their growth and formalization. On the other hand, strengthening financial inclusion through tailored solutions, support for women entrepreneurs, and more equitable access to financial products contributes positively to reducing access gaps, promoting social mobility, and supporting the economic and social development of traditionally underserved communities.
External stakeholders / assessed impact areas	Customers, local communities, authorities and governments, society at large, as well as the environment.	Customers, small and medium-sized enterprises (SMEs)
Relevance of the issue to external stakeholders	The impact of carbon emissions and climate change is highly relevant to external stakeholders due to its effects on the natural environment, health, biodiversity, and community development. At the same time, there is a growing expectation among clients, regulators, and other stakeholders that financial institutions play an active role in mitigating climate change through responsible financing and the development of sustainable products and services. The way the Bank manages this impact directly affects its reputation, stakeholder trust, and its contribution to long-term sustainable development.	The financial inclusion of women-led SMEs is highly relevant to external stakeholders, as it directly impacts income generation, employment, and local economic development. Lack of access to adequate financial services can limit the growth of these businesses and widen economic and social gaps. At the same time, there is a growing expectation among customers, communities, and other stakeholders that financial institutions promote more equitable conditions for access to financing. Managing this impact helps strengthen trust, the Bank's reputation, and its contribution to financial inclusion and sustainable development.





Materiality metrics for external stakeholders

These metrics support our accountability to external stakeholders, in line with the defined material issues. As they are currently in a consolidation and monitoring phase, these tools allow us to establish a baseline for identifying opportunities for improvement. This approach reinforces our accountability and ensures continuous progress in measuring the prioritized material issues.

Material issue	Emissions management and climate change (Environmental impact)	Financial inclusion and access to financial services for women-led SMEs (Social impact)
Output metric	CO2e emissions generated by our portfolio, measured in tons of CO2 equivalent (tCO2e). This metric allows us to identify and track the direct impact of the Bank's financing activities on climate change and serves as an input for managing risks and opportunities associated with the transition to a low-carbon economy..	The number of women-led SMEs accessing financial products and services, such as savings accounts and small-scale loans, through the Bank's financial inclusion programs, designed to meet the needs of this segment.
Impact Assessment	To assess the environmental impact associated with CO2e emissions. To this end, we measure the carbon footprint of our portfolio-related operations and the emission mitigation potential derived from financing sustainable projects.	The social impact assessment is based on an analysis of women-led SMEs' effective access to financial services and the coverage achieved by inclusion programs. This exercise allows us to evaluate the extent to which the solutions offered contribute to reducing access gaps, strengthening business formalization, and improving conditions for their growth and sustainability.
Impact metric	The impact metric used to assess the external effect of financing is the calculation of CO2e emissions, expressed in annual tons, associated with the Bank's portfolio. This metric makes it possible to quantify the Bank's contribution to the mitigation or generation of emissions and serves as a key benchmark for tracking impact.	The impact metric used measures the number of female beneficiaries, defined as the number of women entrepreneurs and business owners who, by accessing adequate financial services, have strengthened their operations and economic stability. In line with this objective, the Bank has set a strategic goal to increase the portfolio of the 'Pyme Mujer' product by 10% by 2026, reaffirming our commitment to financial inclusion and the expansion of women-led businesses.



Strong Governance and Ethical Leadership





SDG 17.5

At Banco de Occidente, we view corporate governance as the framework that underpins responsible and transparent management: it guides how we make decisions, how we are accountable, and how we safeguard the trust of our shareholders, investors, employees, customers, and communities. Therefore, in 2025 we continued to strengthen a clear governance structure that facilitates timely oversight, consistent controls, and a long-term vision aligned with the highest national and international standards.

Throughout the year, we maintained a focus on governance that combines rigor and approachability. This translates into ensuring that the Board of

Directors and its committees have sufficient and timely information for deliberation, that clear rules for participation exist, and that accountability is verifiable. In this vein, we consolidated practices of transparency and continuous improvement, including tracking our reported holdings and contributions, as well as strengthening the evaluation and control mechanisms that support decision-making.

Complementarily, we have adopted a responsible marketing and labeling approach, aimed at ensuring that information about products and services is clear, accurate, and useful, so that our customers have sufficient information to make informed decisions.

By 2025, we will have established clear and accessible governance based on accountability, integrity, and transparency. We have strengthened the role of the Board and its committees, reinforced our ethics and whistleblowing mechanisms, made progress in adopting best practices from the Código País, and bolstered trust through information security and a responsible marketing and labeling approach.



Corporate Governance Structure

| GRI 2-9 |

Our governance model is geared toward clear decision-making, accountability, and effective controls. The General Assembly defines high-level guidelines; the Board of Directors exercises overall supervision; and Senior Management executes the strategy and manages the business with the support of committees and control functions.

The governance structure is organized into bodies and committees that ensure oversight, transparency, and responsible management. The following presents the ownership structure and the composition of the highest governing body based on consolidated information for 2025.

General Shareholders' Meeting

In 2025, the General Shareholders' Meeting was held on March 26 in person at the Bank's registered office in Cali, Colombia. The Bank has two significant shareholders: Grupo Aval Acciones y Valores S.A. and Inversiones Escorial S.A. Both companies are part of the Business Group formed on December 31, 2018, controlled by Luis Carlos Sarmiento Angulo. Additionally, there is a third significant shareholder, Iván Felipe Mejía Cabal, who is not related to the two aforementioned shareholders.

Tax ID	Company Name	Number of common shares	% of ownership
800.216.181-5	GRUPO AVAL ACCIONES Y VALORES S.A.	112.671.465	72,27%
900.257.179-8	INVERSIONES ESCORIAL	9.572.503	6,14%
17185193	MEJIA CABAL IVAN FELIPE	9.363.231	6,00%

For detailed information, please visit our website and the Colombian Financial Superintendency, where this information is publicly available.



Information on the shares owned by members of the Board of Directors.

Name	Shareholder	Number of shares	% ownership
IVAN FELIPE MEJIA CABAL [1]*	Yes	9.363.231	6,00 %
FELIPE AYERBE MUÑOZ [2]*	Yes	31.509	0,02 %
RICARDO VILLAVECES PARDO	Yes	456	0,0002 %
MAURICIO GUTIERREZ VERGARA	Yes	259	0,0001661 %
JORGE CASTAÑO GUTIERREZ	No	—	—
MAURICIO IRRAGORI RIZO	No	—	—
EDUARDO HERRERA BOTTA	No	—	—
EDUARDO DUQUE SUAREZ	No	—	—
MARIA FERNANDA MEJÍA DE JURI	No	—	—

[1] *As of the date of this report, Director Iván Felipe Mejía Cabal holds a 6% stake in the Bank.
[2] *As of the date of this report, the following relatives within the second degree of consanguinity of Director Felipe Ayerbe Muñoz hold the following percentage stakes:

Rodrigo Ayerbe Muñoz — 0,0195530%
Juan José Ayerbe Muñoz — 0,0184125%
María del Socorro Ayerbe Muñoz — 0,0186607%
Julio Manuel Ayerbe (Patrimonio JMA) – 0,0319122%
María José Ayerbe Gómez – 0,0000481%

Companies that are shareholders of the Bank and of which members of the Board of Directors are part:

Company Name	Member of the Board of Directors	Number of shares	% ownership
INDUVALORES S.A.S	IVAN FELIPE MEJIA	2.721.725	1,7458178 %
J.V AYERBE SAS	FELIPE AYERBE MUÑOZ	8.303	0,0053259 %

The Meeting was conducted in accordance with applicable regulations, the Articles of Incorporation, the Rules of Procedure of the General Shareholders’ Meeting, and other provisions of the Bank. The meeting was held in compliance with the required disclosure, which was provided to shareholders for decision-making purposes and was made available at the Bank’s headquarters and on its website prior to the meeting.

The Meeting was attended by 150.897.620 shares represented out of a total of 155.899.719 subscribed and paid-up shares; that is, the deliberative and decision-making quorum was 96,86%.

The measures adopted during the fiscal year to encourage shareholder participation included direct communication from the chairman and secretary of the meeting.

Regarding the information or requests submitted by shareholders, the Bank’s management was commended amid the recent changes in senior

leadership, with recognition given to the leadership of Chairman Dr. Gerardo Silva and expressions of anticipation regarding the plans he outlined.

The meeting followed a precise agenda in accordance with applicable legislation. Among the main resolutions adopted were: approval of the financial statements; election of the members of the Board of Directors and their compensation; election of the principal and alternate statutory auditors; approval of the proposed profit distribution; and approval of a bylaw amendment regarding the composition of the Board of Directors, among others.

KPMG S.A.S. served as the statutory auditor for the meeting, and its fees were approved in the amount of \$3.806 billion.

Finally, during 2025, requests were received from shareholders regarding dividend payments, share transfers, and requests for tax certificates, among others, all of which were fully addressed.





Board of Directors

| GRI 2-9|

The Board of Directors is the Bank’s highest governing body and is responsible for managing the entity in all matters not exclusively decided by the General Shareholders’ Meeting. From there, it sets the Bank’s course and closely oversees management. To do so effectively, it meets twice a month, generally every two weeks, with clear rules regarding participation, quorum, and decision-making, and relies on specialized committees that delve into key issues. During the reporting period, its agenda included the approval of policies and guidelines related to the social, economic, and environmental impact of our operations on stakeholders.

In this vein, the Board of Directors delegates managing these impacts through a governance model that combines strategic guidelines, ongoing oversight, and technical work carried out by committees. The Board defines policies and guidelines for matters such as risk, sustainability, regulatory compliance, and corporate governance, ensuring they are integrated into the institutional strategy. For its part, management implements these decisions through the vice-presidencies and responsible departments, which manage the impacts within their respective areas and submit periodic reports to the Board. In

addition, the Board presents to the General Meeting—together with Senior Management—the reports and financial statements for each fiscal year and the proposed profit distribution plans, accompanied by the report on the progress of business and the Bank’s overall situation, which includes the sustainability section containing the information reported here.

Currently, the Board of Directors is composed of nine members without alternates, seven of whom are independent.

The participation of independent members on the committees is essential to ensuring effective governance and impartial decisions. By having no direct ties to the organization, they provide an objective perspective that allows for a more balanced and transparent evaluation of issues. This independence helps prevent undue influence and properly manage potential conflicts of interest, strengthening internal controls and boosting the confidence of shareholders and investors. Furthermore, it facilitates the adoption of best practices and compliance with governance standards and regulations. Collectively, their contributions support the Bank’s smooth operation, protect its long-term interests, and promote ethical and responsible management.



Process for appointing members of the Board of Directors:

| GRI 2-10|

At the Bank, the process for appointing members of the Board of Directors is carried out in accordance with the Bylaws and the [Appointment and Compensation Policy](#), ensuring a transparent procedure based on suitability criteria. The evaluation of candidates considers, among other aspects, their professional background, skills and knowledge, track record, and relevant experience (especially in the financial sector), as well as factors such as reputation, leadership, and the ability to contribute to the Bank’s strategic oversight. This process is supported by internal corporate governance bodies

and culminates in the presentation and election by the competent body, ensuring the traceability of decisions and promoting a balanced composition that strengthens independence of judgment and the quality of deliberation.

In 2025, at the General Shareholders’ Meeting held on March 26 of that year, considering the slate presented by Grupo Aval Acciones y Valores S.A., the following Board of Directors was elected for the term from April 1, 2025, to March 31, 2026, with 96,78% of the voting capital in favor:

Junta Directiva 2025 – 2026	
Ricardo Villaveces Pardo	Principal Member
Jorge Castaño Gutiérrez	Principal Member
Iván Felipe Mejía Cabal	Principal Member
Felipe Ayerbe Muñoz	Principal Member
Mauricio Gutiérrez Vergara	Principal Member
Eduardo Herrera Botta	Principal Member
Mauricio Iragorri Rizo	Principal Member
Eduardo Duque Suárez	Principal Member
María Fernanda Mejía Castro	Principal Member

There are no alternate members; in that sense, all members are principal members.

The Chair of the Board is not a senior executive of the organization.



Subsequently, the legal procedures for **taking office** were carried out **before the Financial Superintendency of Colombia**, and were duly approved. This process, carried out with transparency and traceability in mind, strengthens confidence in the decisions made and ensures that our governance structure remains aligned with current regulations. In this way, we provide shareholders and investors with the peace of mind that comes from knowing our management is committed to best corporate governance practices and regulatory compliance. The criteria followed by the Bank are those of legal origin, namely:

- “...Any person who under no circumstances is:
- 1. **An employee or executive of the issuer or any of its affiliates, subsidiaries, or parent companies**, including those who held such a position during the year immediately preceding the appointment, unless the appointment involves the reelection of an independent person.
 - 2. **Shareholders who, directly or by virtue of an agreement, direct, guide, or control** the majority

of the entity’s voting rights or who determine the majority composition of its administrative, management, or supervisory bodies.

- 3. **A partner or employee of associations or companies that provide advisory or consulting** services to the issuer or to companies belonging to the same economic group as the issuer, when the income from such services represents twenty percent (20%) or more of their operating income.
- 4. **An employee or executive of an NGO, association, or company** that receives significant donations from the issuer.
- 5. **Significant donations are those that represent more than twenty percent (20%)** of the total donations received by the respective institution.
- 6. **An administrator of an entity** on whose board of directors a legal representative of the issuer serves.
- 7. **A person who receives from the issuer any remuneration other than fees** as a member of the board of directors, the audit committee, or any other committee created by the board of directors.”

And whether they comply, as follows:

Members	Year of Appointment	Type
Eduardo Duque Suarez	2024	Estate
Jorge Castaño Gutiérrez	2025	Estate
Ricardo Villaveces Pardo	1991	Independent
Felipe Ayerbe Muñoz	1993	Independent
Iván Felipe Mejía Cabal	1996	Independent
Mauricio Gutiérrez Vergara	2008	Independent
Mauricio Iragorri Rizo	2014	Independent
Eduardo Herrera Botta	2015	Independent
Maria Fernanda Mejía Castro	2024	Independent



Resumes of the 2025–2026 Board of Directors

Felipe Ayerbe Muñoz

Vice Chairman of the Board of Directors / Principal Member

Age: 75

Lawyer (University of the Andes). Specialization in Commercial Law (National University). Specialization in Comparative Law (NYU).

Member of the Banco de Occidente Board since 1993. Serves on the Board of Directors of the Fundacion Carulla.

Attendance at Meetings: 100%

Iván Felipe Mejía Cabal

Chairman of the Board of Directors / Principal Member

Age: 78

Engineer from the University of Los Andes

Member of the Banco de Occidente Board since 1996. Serves on the boards of Ingenio Providencia, the Palmira Chamber of Commerce, and Industrias de Envases.

Attendance at Meetings: 93%

Ricardo Villaveces Pardo

Principal Member

Age: 76

Industrial Engineer from the Universidad de los Andes, expert in Information Security and Cybersecurity, certified since 2024 in ESG Director Training by the IFC. Expert in information security.

Member of the Board of Banco de Occidente since 1991 and member of the boards of directors of: Global Seguros de Vida S.A., Fiduciaria Renta 4 Global S.A., Colfuturo, Imecol S.A.S., and Asocaña

Attendance at Meetings: 96%

Eduardo Duque Suarez*

Principal Member

Age: 60

Economist (University of the Andes).

Board Member at Banco de Occidente since 2014. Corporate Vice President of Risk at Grupo Aval. Over 27 years of experience in the financial sector: risk supervision, Basel III, complex transactions, corporate and consumer banking, corporate finance, and investment banking in Latin America.

Attendance at Meetings: 93%

Jorge Castaño Gutiérrez*

Principal Member

Age: 49

Lawyer (Externado University). Specialist in Financial and Securities Law. Master's in Economic Development (Carlos III University of Madrid).

Member of the Banco de Occidente Board since 2025. Corporate Vice President of Financial Assets and Efficiency at Grupo Aval Acciones y Valores. He is currently a principal member of the boards of Aval Fiduciaria and Aval Casa de Bolsa. He served as Financial Superintendent of Colombia and participated on the boards of FOGAFIN and FOGACOOP.

Attendance at Meetings: 100%

*Notes: 1. Experience is based on the Dow Jones GICS classification.
–Minimum attendance rate for members is 75%.



Mauricio Gutiérrez Vergara

Principal Member

Age: 67

Medical Doctor (Javeriana University). Specialist in Arthroscopic Surgery (NYU). Specialist in Orthopedics and Traumatology (Javeriana University).

Expert in Personalized Coaching; Investment Banking; Business Management. Knowledge of banking.

Certified since 2024 in ESG Director Training by the IFCMember of the Banco de Occidente Board since 2008. Serves on boards/holds roles at the Colombian Society of Orthopedic and Traumatological Surgery Scott; Latin American Society of Knee Arthroscopy; Latin American Society of Arthroscopy, Knee, and Sports; Financial Committee of Imbanaco Medical Center; Financial Committee of Promedio.

Attendance at Meetings: 100%

Mauricio Iragorri Rizo

Principal Member

Age: 59

Industrial Engineer (University of Georgia).

Kellogg School of Management — CEO's Management Program. Certified since 2024 in ESG Director Training by the IFC.

Board Member of Banco de Occidente since 2014.

Experience: Plant Engineer, Cost Manager, Assistant Operations Manager, Commercial Manager, and General Manager at Mayagüez S.A.

Attendance at Meetings: 89%

Eduardo Herrera Botta

Principal Member

Age: 68

Industrial Engineer (Pontificia Universidad Javeriana). Master's in Administration and Finance. Specialization in Marketing (EAFIT). Expertise in foreign trade.

Member of the Board of Banco de Occidente since 2015. President of SUPERTEX S.A. and serves on the boards of Grupo Fanalca, Alianza Fiduciaria, Imecauca, Zona Franca Palmaseca, Ciudad Limpia, RF Comunicaciones, and ANDI.

Attendance at Meetings: 85%

Maria Fernanda Mejía Castro

Principal Member

Age: 66

Certified Public Accountant (Pontificia Universidad Javeriana). Training in External Auditing, Certified Management Systems, Corporate Governance, CSR, and Family Businesses.

Colombia Capital Program: Bond Issuance and Securities Market Disclosure Mechanisms. Ernst & Young: Transfer Pricing.

Member of the Board of Banco de Occidente since 2024. Chair of the Board of Directors of the Fundación Casa de Colombia. Leader of the Association of Consular Ladies of Cali. Member of the Financial Committee of the Tobías Emmanuel Institute. Member of the Financial Committee of the Fundación Casa de Colombia. Member of the Treasury Committee of Liceo de La Amistad.

Attendance at Meetings: 93%



Notes: 1. Experience is based on the Dow Jones GICS classification.

–Minimum attendance rate for members is 75%.



Independence Criteria

To ensure objectivity and avoid conflicts of interest, members of the Board of Directors (or those applying to this body) must declare that **they are not** in any of the following situations:

- **Employment or management relationship:** not to be, nor to have been during the year immediately preceding their appointment, an employee or executive of the Bank or any of its affiliates, subsidiaries, or parent companies.
- **Shareholding or voting control:** not being a shareholder who, directly or through agreements, has directed, guided, or controlled the majority of the Bank's voting rights, or who determines the majority composition of the administrative, management, or control bodies.
- **Relationship with advisory firms:** not being a partner or employee of associations or companies that provide advisory or consulting services to the Bank (or to companies within the same economic group), when income from such services represents 20% or more of their operating income.
- **Relationship with entities receiving donations:** not being an employee or executive of a foundation, association, or

company that receives significant donations from the Bank (those representing more than 20% of the total donations received by the institution are considered significant).

- **Cross-ownership with Bank representatives:** not serving as a director of an entity on whose board of directors a legal representative of the Bank serves.
- **Additional compensation:** not receiving any compensation from the Bank other than fees for serving as a member of the Board of Directors, the Audit Committee, or any other committee established by the Board of Directors.

During 2025, no participation by members of the Board of Directors of the parent company, **Grupo Aval Acciones y Valores S.A.**, was identified on the Board of Directors of **Banco de Occidente S.A.**, nor was there any evidence that any of them performed executive functions at the entity.

As part of the analysis, it was also reviewed whether any members of the parent company's

Board of Directors (Grupo Aval) were part of the boards of directors of Banco de Occidente's subsidiaries as of **December 31, 2025 (Fiduciaria de Occidente S.A., Ventas y Servicios S.A., Banco de Occidente Panamá S.A., and Occidental Bank (Barbados) Ltd.)**. Based on the available corporate information, **no participation** by members of the parent company's Board of Directors on the boards of directors of those subsidiaries **was found**.

Similarly, we verified whether any members of the Board of Directors of **Banco de Occidente S.A.** hold positions on the boards of directors of the subsidiaries. In particular, it was identified that, as of March 14, 2025, **María Fernanda Mejía** serves on the Board of Directors of **Banco de Occidente Panamá S.A.**





Functions of the Board of Directors

| GRI 2-12; GRI 2-14|

During the period covered by this report, the Board of Directors approved policies, guidelines, and decisions that incorporate the most relevant social, economic, and environmental impacts for our stakeholders into the Bank’s management. In this way, it closely supports the Bank’s strategic direction and oversight, ensuring that these issues are managed with transparency, integrity, and accountability.

Additionally, among its functions is to present to the General Shareholders’ Meeting—together with Senior Management—the reports and financial statements for each fiscal year and the proposed profit distribution plans, accompanied by a report on the progress of the business and the entity’s overall situation. This report includes a sustainability chapter, which consolidates the information we share here.

Among the most notable decisions made by the Board of Directors in 2025, we include:

2025 Session	Minutes No.	Notable Decisions of the Board of Directors
February 21, 2025	1688	Update to the Board of Directors’ Bylaws, incorporating best practices in corporate governance, regulatory adjustments, and internal guidelines.
March 14, 2025	1691	Approval of the amendment to the Regulations of the Appointments, Remuneration, and Governance Committee, in accordance with new corporate governance guidelines.
March 28, 2025	1692	Artificial Intelligence Guidelines.
June 13, 2025	1698	Approval of the Corporate Communications Policy and the Bank’s Resolution Plan (annual update).
June 27, 2025	1699	Approval of the SARLAFT Manual Update; adjustments to the Risk and Audit Committee.
July 11, 2025	1700	Approval of the Sustainable Finance Policy within the framework of the CSA/DJSI (sustainability and corporate governance) and the reclassification of hedging derivatives to the banking book.
August 15, 2025	1703	Approval of the Large Exposures Policy.
August 22, 2025	1704	Approval of the adjustment to the Board of Directors’ delegated powers
September 12, 2025	1705	Approval of Human Resources Policies

Operations are governed by the Board of Directors’ Bylaws.

The Board of Directors’ support committees are:

- Audit Committee
- 1. Comprehensive Risk Committee
- 2. Nominations, Compensation, and Corporate Governance Committee
- 3. Credit Committee





Operations	Operations
Audit Committee	This committee is responsible for generating reports based on transparency and identifying opportunities for improvement that contribute to the optimization of processes; these reports are issued quarterly.
Comprehensive Risk Committee	It is responsible for monitoring the results of the risk profile and appetite, advising the Board of Directors on operations, events, or activities—including new ventures—that may affect the entity’s risk exposure and profile, approving adjustments and changes to SIAR policies, monitoring the state of the risk culture within the entity, and evaluating the analysis of the results of monthly risk management reports, among other tasks. It is also responsible for promoting the adaptation of the company’s risk management to an advanced model that allows for the configuration of a risk profile consistent with strategic objectives, validating reviews of the positive and negative impacts generated by social and environmental issues, supervising compliance with comprehensive climate change risk management, and participating in the accountability process of the Environmental and Social Risk Management System (SARAS). It meets quarterly
Nominations, Compensation, and Corporate Governance Committee	This committee oversees and manages various key areas related to the management of senior staff, compensation policies, and the entity’s governance structure. Its functions include: Proposing or reviewing the appointments of executives and key members of senior management, as well as other strategic positions within the Bank. Ensuring that compensation is aligned with the entity’s strategic objectives, incentivizing appropriate performance and responsible management. Evaluating and proposing improvements to the governance structure, including the composition of the board of directors and internal committees. The inclusion of independent members on committees is essential to ensure effective governance and impartiality in decision-making; these members, having no direct ties to the organization, provide an objective and unbiased perspective, which allows for a more equitable and transparent assessment of situations. Their independence ensures that decisions are made without external influences or conflicts of interest, which strengthens internal control, fosters shareholder and investor confidence, and facilitates compliance with best practices and governance regulations. Thus, they contribute to the Bank’s smooth operation by protecting its long-term interests and promoting ethical and responsible management
Credit Committee	The Credit Committee’s primary function is to review credit applications submitted by the Bank’s management, in accordance with the Bank’s policies, and to issue recommendations regarding the credit risk associated with projects presented to the Bank. It is composed of directors with experience in financial analysis and risk management, which enables rigorous, objective evaluations aligned with the Bank’s strategic objectives. During 2025, the Credit Committee held a total of seventeen (17) meetings, during which it evaluated and approved transactions based on criteria of accountability, technical soundness, and prudent risk management.

Effective **June 27, 2025**, the composition of the committees supporting the Board of Directors consisted of three (3) principal members, appointed from among the members of the Board of Directors itself.

Subsequently, at a Board of Directors meeting held on **August 22, 2025**, the creation of the **Credit Committee** was approved, and it was incorporated into the structure of support committees to strengthen supervision and management in credit matters.





Support Committees and Meetings Held (2025)

Committee	2025 Meetings	Frequency	Composition	Board members
Audit Committee	7 (6 regular, 1 extraordinary)	Quarterly	3 independent members of the Board of Directors	Felipe Ayerbe Muñoz Ricardo Villaveces Pardo Iván Felipe Mejía Cabal
Comprehensive Risk Committee	4 (3 at extraordinary Board meetings + 1 formal Committee session)	Quarterly	3 Board members	Eduardo Duque Suarez Mauricio Iragorri Rizo Maria Fernanda Mejía de Juri
Nominations, Compensation, and Corporate Governance Committee	5 (regular)	Semiannual	3 Board members	Jorge Castaño Gutiérrez Eduardo Herrera Botta Mauricio Gutiérrez Vergara
Credit Committee	17	As needed	Directors with experience in financial analysis and risk management	Felipe Ayerbe Muñoz Maria Fernanda Mejía de Juri Ricardo Villaveces Pardo

Collective expertise of the highest governing body

| GRI 2 — 17 |

During the reporting period, the governing body participated in various training sessions aimed at strengthening its collective knowledge on matters relevant to business oversight. The training sessions addressed topics such as sustainability and international standards applicable to the financial sector, climate risks and their impact on credit risk management, artificial intelligence and data analytics, cybersecurity and data privacy, as well as regulations and corporate governance practices. These activities helped strengthen the understanding of the financial, regulatory, and operational impacts necessary for informed decision-making.



Board of Directors Evaluation

| GRI 2-18 |

As part of the implementation of best practices and guidelines regarding corporate governance, Banco de Occidente conducted the Board of Directors evaluation process for the 2025 period. The purpose of the evaluation is to identify and establish agreements within the Board of Directors and with Senior Management regarding actions to strengthen the various factors that affect the Board's performance and its relationship with the group's governing bodies.

In accordance with best practices in corporate governance, evaluations alternate between internal and external assessments. Therefore, in 2025, the Board of Directors, as a collegiate body, and its committees conducted the performance evaluation with the support of Governance Consultants (www.governanceconsultants.com), an independent firm with over 15 years of experience in evaluating the Boards of Directors of leading companies in Latin America.

The evaluation for the 2025 period was based on an analysis of corporate documents and the completion of questionnaires by the 9 Board members and 8 members of the Senior Management team. In addition to an analysis of the Board of Directors' structure, composition, and attendance, the evaluation addressed the following dimensions: i) Contribution and fulfillment of responsibilities; ii) Board focus; iii) Dynamics and operations; iv) Roles of the Board of Directors (Chair and Secretary); and v) Support committees.

The evaluation demonstrates progress in the evolution of the Board's structure and functioning, as well as in the strengthening of support mechanisms that have allowed for a greater focus of the agenda on strategic matters. It also contributes to deepening reflection on the Board's role in the face of an evolving financial environment, including risk management and the consolidation of corporate governance practices aligned with a long-term vision.

Board of Directors Compensation Policy

| GRI 2-19 |

Since the **General Shareholders' Meeting of March 26, 2020, Banco de Occidente**, to strengthen best corporate governance practices, adopted and adjusted the **Board of Directors' Appointment and Compensation Policy, which was designed by Grupo Aval Acciones y Valores S.A.**

What does this policy cover? It is organized into three main components:

- ✓ **Composition of the Board of Directors:** defines the criteria to ensure a board with the appropriate profile, considering **professional background, skills, knowledge, and/or experience** related to the financial sector, as well as factors such as **recognition, reputation, and leadership**, among others.
- ✓ **Nomination and Evaluation:** establishes the **procedure** for the submission and evaluation of **proposals and candidates**.
- ✓ **Compensation:** sets forth the guidelines regarding the **compensation** of the Board of Directors.

Appointment and Compensation Policy of the Board of Directors





Board of Directors Compensation

| GRI 2-20 |

For the statutory term **March 2025 — March 2026**, at the General Shareholders’ Meeting held on **March 26, 2025**, the recommendation presented by the **Nominating, Compensation, and Corporate Governance Committee** was approved, setting the Board of Directors’ fees at COP \$6.312.000 for each Board meeting and COP \$1.578.000 for attendance at committees reporting to the Board. This means that in 2025, fees totaling **COP 1.520.661.000** were incurred for attendance at Board of Directors meetings and **COP 87.276.000** for attendance at committee meetings.

As of **October 31, 2025**, Board members received fees for their participation and attendance at Board meetings and the committees of which they are members.

Board of Directors Meetings	2025
Attendance Rate of Alternate Members of the Board of Directors	Banco de Occidente does not have alternate members on the Board of Directors
Minimum attendance rate for members	According to the Board of Directors’ internal regulations, the minimum attendance rate for meetings is 75%
Frequency of Board Meetings	Generally, every 15 days
Fees	COP 6.312.000 per meeting



Management of Information by the Board of Directors

| GRI 2-16 |

We maintain a clear process for promptly communicating critical concerns to the highest governing body, ensuring that Board members have the necessary information to prepare for and conduct their meetings thoroughly. With the support of the Board Secretary’s team, relevant documentation and reports are shared in advance—whenever possible, at least five (5) days before each meeting—which facilitates informed deliberation and timely follow-up on key issues.

To facilitate access and traceability, these communications are conducted via digital tools such as **Teams and email**, allowing directors to quickly access information and ensuring that urgent or particularly relevant matters can be reviewed and managed efficiently even before the meeting.





Investor Relations

We provide our shareholders with clear mechanisms to exercise their right to receive timely information, always respecting applicable confidentiality criteria and ensuring equitable treatment, regardless of the size of their stake.

To make this possible, we offer:



- ✓ **Specialized services:** an interdisciplinary team supported by legal and tax experts.



- ✓ **Internal rules and support:** management of requests in accordance with current regulations and our **MAN-CAP-066 manual**.



- ✓ **Available channels:** email, telephone support, and the Bank's website.

This approach aligns with the provisions of **Article 7 of the Bank's Bylaws**, which states that:

- ✓ Each share entitles the holder to **one (1) vote** in decisions of the **General Shareholders' Meeting** (subject to the restriction set forth in **Article 22**).
- ✓ The Company guarantees **equal treatment** to all shareholders in the exercise of their rights to petition, file complaints, and request information, regardless of the value of their shares.

Within this framework, we promote equitable treatment through mechanisms such as:

1. **Requesting the convening** of the General Meeting, in accordance with the Bylaws and the Code of Good Governance.
2. **Requiring compliance** with the Code of Good Governance.
3. **Being attended to and informed with** the same level of detail and at the same time and opportunity, to protect their rights.
4. **Accessing the other mechanisms** provided for in the Bylaws, the Code of Good Governance, and the Law.

Assistance and the provision of information are provided by the **department designated** by the Bank to handle shareholder relations.





Senior Management

| GRI 2-13 |

Senior Management is responsible for the administration of the Bank and leads the execution of the corporate strategy, integrating sustainability practices into daily management that strengthen value creation for the organization and our stakeholders. It is headed by the President and comprises the Vice Presidents, who periodically report to the Board of Directors on progress and results, and, together with the Board, reports to the General Shareholders' Meeting on performance and achievements, in accordance with the provisions of Chapter Three of the Code of Good Corporate Governance, regarding the mechanisms for evaluating and controlling the activities of administrators, senior executives, and directors. The Office of the Ombudsman, as well as the Audit, Treasury, and Compliance departments, also support the President in his management duties.

At the Board of Directors meeting on January 10, 2025, the resignation of Iván Mauricio Ricardo Arias was accepted, and the appointment of Carlos Andrés Echeverri as Vice President of Companies was approved. On that same day, the Board accepted the resignation of Pedro Luis Villegas, and on March 6, 2025, Mario Botina Tovar was appointed Vice President of Operations and Technology. Subsequently, on September 12, the resignation of Mr. Eduardo Alfonso Correo was accepted, and the appointment of Ángela María Ceballos as Vice President of Human Resources and Administration was approved. Finally, at the meeting on September 26, 2025, the resignation of Douglas Berrío Zapata was accepted, and the appointment of Juana Beltrán Echeverri as Vice President of Legal Affairs was approved.

A significant milestone in 2025 regarding diversity and inclusion was the appointment of two women to vice-presidential positions, strengthening female representation in senior management and broadening the diversity of perspectives in decision-making. In this context, the Board of Directors approved the appointment of Ángela María Ceballos as Vice President of Human Resources and Administration and of Juana Beltrán Echeverri as Vice President of Legal Affairs, marking concrete progress toward a more diverse, balanced, and representative leadership.



The following details the information regarding the Bank’s President and Vice Presidents as of December 31, 2025:

Bank President	Education and experience (profession, postgraduate degrees, and career history)	Key Responsibilities
Gerardo Silva Castro	Civil Engineer from the Javeriana University in Bogotá, with a Master’s degree in Business Administration from Babson College in Wellesley, United States. Experience at the Bank: 32 years Previous experience in the financial sector: 25 years. He currently serves on the following boards of directors: Porvenir, the ANIF Board of Directors, and Asobancaria.	He is the bank’s legal representative, enters into all types of agreements and contracts with the approval of the Board of Directors, oversees the general management of the bank’s business, convenes the Board of Directors, ensures compliance with the bylaws, rules, and provisions of the shareholders’ meeting and the Board of Directors, ensures respect for the rights of shareholders and other investors, and provides the market with timely, complete, and accurate information regarding its financial statements and its business and administrative performance, without prejudice to the provisions of Articles 23 and 48 of Law 222 of 1995.





Vice President	Vice President	Education and experience (profession, advanced degrees, and career history)	Key Responsibilities
Mauricio Maldonado Umaña	Vice Presidency of Finance and Strategy	Industrial Engineer and MBA Experience at the Bank: 7 years Previous experience at Grupo Aval: 13 years	He guides and directs financial policies and procedures to ensure the achievement of objectives in financial planning, budgeting, financial analysis, pricing, profitability, accounting, and taxes. He leads corporate transformation aligned with the business strategy through the management of high-value projects (profitability and efficiency), advanced analytics, data governance, service digitization, and the rollout of the strategy for internal adoption. Additionally, he leads the management of the Bank's subsidiaries.
Juana Beltrán Echeverri	Vice Presidency Legal Affairs	Attorney. Master's Degree in Law, Economics, and Public Policy Legal Specialist Experience at the Bank: 5 months Previous experience in the financial sector: 18 years	Leads the Bank's legal management with a preventive and strategic approach, supporting decision-making in corporate governance, regulation, financial structuring, and comprehensive management of legal matters and associated risks.
Julián Alfonso Sinisterra Reyes	Vice President of Retail Banking	Business Administrator Experience at the Bank: 5 years Previous experience at Grupo Aval: 9 years	Develops strategic plans to build lasting and profitable relationships with affluent individuals, identified at points of demand (dealerships and construction companies) and deepened through a value proposition encompassing investment, financing, and insurance. He is responsible for segmentation, developing value propositions, measuring profitability, business intelligence, monitoring the customer experience, developing services across physical and digital channels, card activation/usage/billing strategies, and generating revenue from commissions associated with policies that mitigate risk exposure for both the Bank and its clients.
Carlos Andrés Echeverri	Vice President of Corporate Banking	Industrial Engineer and MBA. Experience at the Bank: 11 months Previous experience: 9 years as manager of the subsidiaries of Banco de Occidente Panama and Occidental Bank Barbados.	Leads the strategy and development of the corporate business, strengthening commercial relationships, sustainable growth, and risk management in the corporate segment, in line with the Bank's strategy.
Ángela María Ceballos Buitrago	Vice President of Human Resources and Administration	Industrial Engineer Experience at the Bank: 30 years Training in Strategic Management and Strategic Talent Development.	Leads human resources management and organizational administration to strengthen capabilities, culture, well-being, and leadership, ensuring conditions that enable performance, productivity, and organizational sustainability.



Vice President	Vice President	Education and experience (profession, advanced degrees, and career history)	Key Responsibilities
Fabián Mauricio Arias	Vice President of Risk and Collections	Industrial, Systems, and Computer Engineering; Master's in Financial Economics Experience at the Bank: 1 year	Responsible for the administration and management of operational, credit, market, liquidity, balance sheet, AML/CFT, security, and SOX risks, as well as bulk collections management.
Iván Mauricio Cepeda Díaz–Granados	Vice President of Credit	Civil Engineer, MBA Years with the Bank: 7 Previous experience at Grupo Aval: 11 years	Leads the processes necessary for credit approval by analyzing the market, customer financial information, and applicable regulations, aiming for low risk and maximum profitability in the commercial and consumer segments. Coordinates portfolio assessment and rating, estimated loss calculations, and the determination of loan loss reserves.
Mario Fernando Botina Tovar	Vice President of Operations and Technology	Electrical and Telecommunications Engineer, Master's in Electrical and Computer Engineering, and Executive Master's in Technological Innovation. Previous experience at Grupo Aval: 3 years Experience at the Bank: 1 year	Leads operations and technology management, driving technological modernization, operational efficiency, service continuity, optimization of digital channels, and innovation to strengthen the customer experience and the sustainability of operations.





Senior Management Evaluation

Senior management members are evaluated using the **Balanced Scorecard (BSC)**, with **monthly** monitoring and **quarterly** reporting of results. This framework allows for continuous monitoring of progress against strategic objectives and timely decision-making.

BSC measurement is led internally by the **Financial Planning and Budgeting Department**, based on a dashboard of indicators updated according to the Bank's goals. It includes institutional metrics and indicators specific to each area—adopted based on an external consulting engagement—and is rolled out to the various leadership levels through a **cascading framework**, ensuring that management remains aligned across the entire organization. These results form part of the **annual performance evaluation** of leaders.

Regarding **compensation**, Senior Management receives a **base salary** and an **annual bonus** tied to the Bank's results from the immediately preceding year, the allocation of which is approved by the **Chairman of Grupo Aval**. In addition, managers who support senior management receive a **comprehensive salary**, and in the case of the **Treasury Department**, **quarterly variable compensation** is also provided, contingent upon meeting performance targets for each period.



Conflict of Interest

| GRI 2-15|

During the period covered by this report, no conflicts of interest arose that required referral to the **Board of Directors**; the cases identified were handled through the internal mechanisms established for their analysis and resolution.

The bank has a **Conflict of Interest Committee (CCI)**, which is empowered to determine, during the management phase of a situation that could give rise to a potential conflict of interest, whether the transaction to be carried out is of a recurring nature, part of the ordinary course of business, and/or within market conditions, or whether, on the contrary, the transaction does not fall within the aforementioned criteria

and must decide whether to approve or reject the transaction.

If, as a result of the situation brought to its attention, the CCI determines that the proposed transaction represents a conflict of interest and the decision regarding it exceeds its scope of authority, the CCI must bring this to the attention of the Board of Directors of its respective entity.

Our Board of Directors evaluates the elements constituting the conflict of interest and shall issue a reasoned decision, in accordance with its legal and statutory powers, indicating:

- i) its approval of the transaction, ii) whether the entities must refrain from carrying it out, iii) whether it may be carried out subject to the modification of certain conditions, or iv) whether the execution of the transaction must be submitted for consideration

by their respective general shareholders meetings. The criteria regarding which transactions may be decided by the Board and which by the shareholders' meeting shall include, among other matters deemed relevant by each entity, certain materiality criteria.

The policy for the identification, disclosure, and management of conflicts of interest was approved by the Board of Directors through Minutes No. 1525 dated June 28, 2019. In December 2019, we implemented this policy at Banco de Occidente through the publication of Annex (ANX-COL-711), titled "Annex 1 — Conflict of Interest Policy of the Aval-Banco de Occidente Conglomerate; and we established the Conflict of Interest Committee, composed of the following principal members: Chief Financial Officer, Chief Risk Officer, and General Counsel; and alternate members: Accounting Manager, Credit Risk Manager, and Retail Banking Legal Manager."



Internal Control System (ICS)

The Internal Control System (ICS) of the Bank and its Subsidiaries is a **continuous and dynamic** process that seeks to strengthen the efficiency and continuous improvement of its components—control environment, risk management, and monitoring—with the active participation of all employees, from operational teams to the Board of Directors. Within this framework, **Internal Audit**, acting with independence and objectivity, oversees compliance with governance and control processes in accordance with the current regulatory framework. To this end, it conducts risk-based audits and submits the results and recommendations derived from its work to the Board of Directors’ **Audit Committee on a quarterly basis**. Additionally, it promotes a culture of risk management through an **annual training plan**, helping to ensure that prevention, control, and continuous improvement are part of the organization’s daily operations.

Assessment of the Performance of the Internal Control System (ICS)

In compliance with the provisions of the **Basic Legal Circular** issued by the Financial Superintendency of Colombia, the **Internal Control System (ICS)** of the Bank and its subsidiaries was properly managed during **2025**, achieving **reasonable risk mitigation**. This assessment was based on a comprehensive analysis of the ICS components, which include the Control Environment, Risk Management, **Control Activities, Information and Communication, Monitoring, and Independent Assessments**.

Código País Survey (2025, report submitted in January 2026)

The **Código País** survey is a key input for continuing to strengthen our corporate governance practices. It allows us to review, with a critical and systematic eye, how well we align with the highest standards of **transparency, ethics, and accountability**; identify opportunities for improvement; strengthen internal controls; and optimize management. In practice, this translates into greater investor confidence, a stronger reputation, and a better ability to anticipate and manage risks.

In **2026**, we presented the Bank’s report on the implementation of best corporate governance practices, based on this survey, which covers **33 key measures** and a total of up to **148 recommendations**. The **Código País** survey for the year **2025** was distributed in January 2026. In this exercise, the Bank reported the adoption of **132 measures**; **2 measures** do not apply to Banco de Occidente, and the remaining ones are under analysis to determine their feasibility for implementation. The published responses can be viewed on our website, in the **Shareholder and Investor Information** section.



Processes to address negative impacts

| GRI 2-25|

Banco de Occidente has made clear and measurable commitments in the management of its **After-Sales Support Model, aimed at addressing negative impacts and reducing their likelihood of occurrence**. In 2025, we continued to strengthen this model with concrete actions that combine preventive monitoring, timely response, organizational learning, and active customer participation to sustainably improve service quality.

We have **online monitoring mechanisms** that enable the early identification of technical and operational incidents that could affect service continuity and quality, triggering timely remedial actions in the event of any deviation. In this vein, we have implemented the **Digital Operations Center (COD)**, designed to monitor critical systems and processes in real time. This center enables **early alerts, structured incident management, and the resolution of failures within a maximum of three (3) hours**, contributing to

more efficient operations and service sustainability. In addition to identifying and promptly resolving incidents that impact customers, we maintain an ongoing commitment to **prevention and reducing recurrence** through the implementation of **corrective and preventive actions**.

Our management is based on a **root cause analysis** approach, which strengthens continuous improvement and service quality. As a result, in 2025 we achieved an **11,5% reduction in the number of Mechanisms for Requests, Complaints, Claims, and Suggestions — PQRS compared to 2024 and an improvement of six (6) positions in the “Number of Complaints per Institution”** ranking published by the Financial Superintendency, demonstrating more efficient and customer-oriented management. In addition, we use technological and **automation** solutions to minimize impacts associated with manual errors and optimize response times. In particular, the implementation of process automation tools **reduced service times by 39%**, ensuring faster, clearer, and more timely responses, and strengthening the customer experience and the sustainability of operations.

Approach to Identifying and Addressing Complaints and Established Mechanisms

The Bank continuously strengthens a **root-cause analysis** model to identify, analyze, and address complaints in a timely manner, promoting both immediate corrective actions and structural improvements that strengthen the value proposition and the long-term relationship with customers. Additionally, we are making progress in simplifying and improving the accessibility of complaint mechanisms, facilitating customer interaction through multiple channels. As a result, as of **November 2025, 18% of Contact Center interactions took place through digital channels**, diversifying the means of contact that were previously concentrated mainly on phone calls and improving customer experience.

Stakeholder participation in the design, review, operation, and improvement of mechanisms

We facilitate stakeholder engagement, particularly that of financial consumers—in the design, review, operation, and continuous improvement of complaint and grievance mechanisms through surveys, satisfaction surveys, and direct feedback channels. By the end of 2025, we had collected 4,162 valid surveys—nearly double the number from 2024—strengthening the representativeness of the customer’s voice in decision-making.

The information obtained, comments, perceptions, complaints, and behaviors, is systematically integrated into the continuous improvement cycle as follows:

- ✓ **Design:** We analyze textual comments, recurring causes, access barriers, and segmented results of experience indicators (INS) to redesign documentation, workflows, and procedures for complaint mechanisms.
- ✓ **Review:** Users evaluate channels, response times, and service quality; their observations lead to operational, technical, and product adjustments across the board.





- ✓ **Operation and metrics:** Perceptions regarding channels, mechanisms, and service quality are converted into indicators such as **INS and CSAT**, the monitoring of which drives decisions regarding automation, process simplification, regulatory adjustments, and the restructuring of operational workflows.

This approach allows us to close the feedback loop with users, ensuring that their participation is reflected in concrete and sustainable improvements.

Monitoring effectiveness and evidence of results

We systematically and continuously monitor the effectiveness of complaint and claim mechanisms, as well as associated remediation processes, through quantitative and qualitative indicators that incorporate direct feedback from stakeholders. As a result of this monitoring, in 2025 we achieved **97% compliance with response times, placing us 5 percentage points** above our historical averages. Additionally, we achieved a substantial reduction in average response times, dropping from **9,5 days in 2024 to 5,8 days in 2025**, which demonstrates the greater effectiveness of the implemented mechanisms.

The main enablers of monitoring and evaluation are:

- ✓ **CSAT for submission channels:** we measure satisfaction by channel (office, form, Contact Center, social media, and Relationship Manager), identifying specific shortcomings and evaluating the effectiveness of the operational or technological adjustments implemented.
- ✓ **INS (Response Satisfaction Index):** We assess whether the response provided was relevant and satisfactory from the customer's perspective, validating the mechanism's effectiveness in resolving the underlying issue of the complaint.
- ✓ **Analysis of causes of dissatisfaction:** We systematically identify the causes of the lowest satisfaction levels, guiding the redesign of remediation processes and the implementation of corrective and preventive actions.
- ✓ **Textual user feedback:** We conduct qualitative monitoring of direct comments that highlight operational failures and aspects of perceived quality, using them as input to measure the actual effectiveness of the mechanisms.
- ✓ **Quality assessment of responses using Artificial Intelligence (ARI):** We implement an automated validator that reviews the relevance, attachments, tone, form, and clarity of communications sent to financial consumers, enabling continuous, preventive, and comprehensive monitoring of the quality and effectiveness of the response process.

Together, this framework closes the feedback loop with stakeholders, ensuring that their perceptions and experiences translate into sustainable improvements in complaint, claim, and remediation mechanisms.





Regulatory and Legal Compliance



SDG 16.5; 16.6; 17.5
| GRI 2-27 |

Regulatory and legal compliance is a cornerstone of financial security that underpins **trust and credibility** with our customers, shareholders, authorities, and other stakeholders. At Banco de Occidente, we work to anticipate **regulatory changes**, ensure the timely application of **current legal requirements**, and maintain controls that support transparent, ethical, and responsible management. We emphasize that the Bank is supported by a robust **governance and control structure**, which has not been implicated in insider trading, antitrust violations, unfair competition practices, market manipulation, malpractice, or other regulatory breaches within the financial industry.

Therefore, during the reporting period, **there were no instances of significant non-compliance** with applicable laws or regulations. Consequently, the **total number of significant non-compliance cases** reported in 2025 was 0, with the following breakdown:

Cases resulting in fines	0
Cases resulting in non-monetary sanctions	0
Cases involving insider trading, antitrust violations, unfair competition practices, market manipulation, malpractice , or other regulatory violations within the financial industry	0

Regarding the description of cases, **to date no significant non-compliance has been identified for the 2025 reporting period**; therefore, there are no events to describe in this section. To determine what constitutes a “significant non-compliance,” the Bank relies on its **risk management methodology**, particularly in the management of **operational risk**, which includes legal risk. This approach allows for the assessment of the materiality and potential severity of events, as well as their impact on the Bank and its stakeholders, ensuring consistency in the analysis and traceability of the report.



Legal and Regulatory Management Structure

At Banco de Occidente, the **Legal Vice Presidency** leads legal and regulatory management, working closely with the various departments to ensure **compliance** and proper management of **legal risk**. Four divisions report to this Vice Presidency, working in coordination to support operations and strengthen our corporate governance:

- ✓ **Legal Department for Retail Banking, Staff, and Subsidiaries:** supports **legal risk** management within the **operational risk** framework and oversees internal regulatory development, as well as the **corporate governance** structure.
- ✓ **Corporate Banking Legal Department:** Provides effective and timely legal advice to the Corporate Banking segments (Institutional and Corporate, Business, and Government) for proper business structuring, contract drafting, and clarification of legal concerns, thereby minimizing the Bank's legal risk.
- ✓ **Litigation Management:** Responsible for managing **litigation** against the Bank and provides specialized advice on **labor and tax** matters.
- ✓ **Asset Normalization Department:** Leads the recovery of **specialized and past-due loan portfolios**, contributing to the Bank's results through efficient collection management and the achievement of demanding budgetary targets.

In addition, we promote the use of conciliation as an alternative to resolve disputes more quickly and

efficiently. With the assistance of a neutral third party who facilitates dialogue, we seek clear and fair agreements for all parties, avoiding protracted legal proceedings and providing our clients with a balanced and timely resolution.

Litigation, Judicial, and Administrative Proceedings

| SASB FN-CB-510a.1|

We manage legal and administrative proceedings with a preventive and responsible approach, ensuring that their potential impact is reflected appropriately and transparently in our financial statements. To this end, proceedings against the Bank that could have a material impact are reviewed and updated annually, in accordance with applicable accounting and financial standards. This process includes the analysis of contingencies and the application of accounting principles to determine, where appropriate, the required provision amount.

During the reporting period, the total amount of monetary losses associated with legal proceedings related to fraud amounted to COP 1.362.366.725, associated with 50 lawsuits in 2025, rulings involving social engineering fraud, malware, fake websites, SIM portability/swapping, and product and card impersonation.

In addition, we have **legal risk** management mechanisms in place to monitor and prevent situations that could lead to litigation. When we are notified of a legal proceeding, a report is triggered to the **Operational Risk** department, which is responsible for managing and mitigating the risk. Finally, during the reporting period, **none of our subsidiaries** recorded any significant legal proceedings requiring disclosure.





Key regulatory provisions in effect in 2025

Definition of Acronyms	
URF	Regulatory Planning and Financial Regulation Studies Unit
SFC	Financial Superintendency of Colombia
SIC	Superintendency of Industry and Commerce
UGPP	Pension and Parafiscal Management Unit
PILA	Integrated Contribution Settlement Form

Issuer	Regulation	Purpose / Description (what it regulates or amends)
Congress	Law 2466 of 2025 (Labor Reform)	Amends the labor framework by redefining the general hiring rule (prioritizing indefinite-term contracts), adjusting working hours, overtime pay, job security conditions, limits on outsourcing, measures to formalize employment, and the strengthening of labor rights, with direct effects on costs, hiring schemes, and labor compliance.
Congress	Law 2514 of 2025	Establishes relief measures aimed at small and medium-sized agricultural producers, with impacts on the financial sector due to the support conditions and measures associated with access to and financial relief for this segment.
Ministry of Finance	Decree 0175 of 2025	Adopts extraordinary tax measures to address spending needs of the General National Budget arising from the state of internal unrest in the Catatumbo region, the Cúcuta metropolitan area, and the municipalities of Río de Oro and González (Cesar).
Ministry of Finance — URF	Decree 0573 of 2025	Adjusts the prudential framework by regulating Risk-Weighted Assets (RWA) for payroll loans in the consumer loan portfolio, defining conditions for the treatment of guarantors, and specifying the “ ” grouping of connected counterparties, thereby strengthening the management of large exposures and risk concentration in credit institutions.
Ministry of Finance	Decree 0572 of 2025	Amends operational tax rules by adjusting self-withholding rates and minimum bases for withholding tax, affecting tax calculations, processes, and reporting.
Ministry of Finance — URF	Decree 1069 of 2025	Regulates payment orders and fund transfers, establishing provisions applicable to payment operations, the execution of transfers, and associated controls, with an impact on transactional and operational processes.
Ministry of Finance	Decree 1390 of 2025 / Decree 62 of 2025	Declares a state of emergency, authorizing extraordinary measures and special provisions for its management, with effects on the institutional and regulatory framework during the duration of the emergency.
Ministry of Finance	Legislative Decree 1474 of 2025	Establishes specific measures to address the declared emergency, defining exceptional actions and provisions to be applied during the emergency period.
SFC	External Circular 03 of 2025	Regulates transitional guidelines for the refinancing of agricultural loans in the context of the Catatumbo emergency, specifying criteria and conditions for application in accordance with Decree 106 of 2025.
SFC	External Circular 04 of 2025	Defines transitional instructions for the relaxation of credit terms for vulnerable populations in areas affected by internal unrest, establishing conditions for access to and management of credit in accordance with Article 12 of Decree 180 of 2025.



Issuer	Regulation	Purpose / Description (what it regulates or amends)
SFC	External Circular 05 of 2025	Adjusts prudential criteria by issuing instructions on the weighting of payroll loans (or direct payroll deductions) for solvency purposes and on the large exposure regime, in accordance with Decrees 1358 of 2024 and 0573 of 2025.
SFC	External Circular 009 of 2025	Provides guidelines for the provision of financial products and services to consumers with criminal records or ongoing criminal investigations, in compliance with Ruling T-113 of 2025, with implications for due diligence, segmentation, and customer service.
SFC	External Circular 0010 of 2025	Regulates aspects of the securities market related to known issuers, recurring issuers, and Issuance and Placement Programs (, PEC), defining conditions, treatment, and guidelines for their application.
SFC	External Circular 011 of 2025	Establishes instructions for the management of environmental and social risks, including climate risk, integrating them into the risk management, governance, and reporting systems of supervised entities.
SFC	External Circular 015 of 2025	Defines reporting obligations and guidelines for the Single Credit Portfolio Information Reporting Module (MURIC), standardizing the form and content of the information reported to the supervisor.
SFC	External Circular 016 of 2025	Regulates transactions with related parties between credit institutions and entities specified in Decree 2555 of 2010, establishing rules, controls, and conditions for operations under Title 19 (related-party regime).
SFC	External Circular 017 of 2025	Strengthens the capital and liquidity management framework by providing instructions on the Stress Testing Framework (EPR) and the implementation of the Capital Self-Assessment (PAC) and Liquidity Self-Assessment (PAL) processes.
SFC	External Circular 021 of 2025	Defines guidelines and scenarios for the stress tests required by the supervisor during 2025, providing guidance on assumptions, parameters, and analysis expectations.
SFC	Circular Letter 018 of 2025	Regulates the processing of personal data in the offering of products and the provision of services (financing, small-amount deposits, and related services) that facilitate financial inclusion through digital technologies, reinforcing duties regarding information, security, and data protection.
SIC	External Circular 01 of 2025	Establishes guidelines on the processing of personal data in technology transfer processes, including conditions, responsibilities, and safeguards for the handling of personal information.
SIC	External Circular 02 of 2025	Defines model contractual clauses for the international transfer and transmission of personal data, standardizing minimum conditions to ensure adequate protection in cross-border data flows.



Issuer	Regulation	Purpose / Description (what it regulates or amends)
SIC	External Circular 03 of 2025	It establishes model contractual clauses for the international transfer and transmission of personal data, standardizing minimum conditions to ensure adequate protection in cross-border data flows.
Labor Issues	Ministry of Labor — External Circular 083 of 2025	Regulates the implementation of Article 21 of Law 2466 of 2025 by classifying the apprenticeship contract as a special fixed-term employment contract, with implications for wages, benefits, and social security, applicable to both existing and new contracts.
Labor Issues	Ministry of Labor / SENA — Circular 83 of 2025	Consolidates mandatory guidelines for companies, PILA operators, and system entities regarding enrollment, payments, and reporting of apprenticeship contracts, in line with labor reform.
Labor Issues	Resolution 3461 of 2025 — Ministry of Labor	Amends the framework for workplace relations by repealing Resolutions 652 and 1356 of 2012 and redefining the composition and operation of the Workplace Relations Committee, strengthening employer obligations regarding harassment, violence, and discrimination in the workplace.
Labor Issues / PILA	Resolutions on Operational Adjustments to PILA (2025) — Ministry of Health / UGPP	Adjust operational and reporting parameters in PILA, including the classification and registration of contributors, resulting from changes such as the conversion of apprenticeship contracts into regular employment, platform work, and new forms of employment introduced by Law 2466 of 2025.
Labor Issues	Resolutions on the implementation of labor inspection standards (2025) — Ministry of Labor	Technical criteria for inspection, monitoring, and control are updated, aligning them with labor reform and expanding the scope of requirements and the risk of penalties for employers in case of non-compliance.

This set of regulations frames the way we operate and reinforces our responsibility to act with rigor, transparency, and compliance in every decision. Their application strengthens stability and confidence in our operations, while promoting more proactive risk management and continuous improvement of our processes. In 2025, these regulatory developments also supported the integration of ESG criteria, ensuring that our governance, social performance, and environmental management practices remain aligned with high standards of sustainability and corporate responsibility.



Ethics and Transparency

| GRI 2-27; 206-1; 205-1; 205-2; 205-3 |

Throughout **2025**, we continued to safeguard one of the Bank’s most important assets: **trust**. We reaffirmed our commitment to **transparency, financial security**, and the protection of our customers against risks associated with **fraud** and other practices that could compromise the integrity of the system. To this end, we maintained and strengthened strategies for **prevention, detection, and incident management**, aligned with regulatory standards and industry best practices.

Our approach combines **preventive** measures and **timely responses**, not only to protect customers but also to contribute to the **stability of the financial system**, a key pillar of our sustainable management. By promoting a safe and reliable environment, we strengthen market confidence and facilitate **financial inclusion**, ensuring that more people and businesses can access financial services safely.

To maintain these results, we work with **internal controls and compliance policies** that strengthen the prevention of misconduct and risk mitigation. This management is based on principles of **integrity, transparency, and accountability**, and seeks to ensure that employees, customers, and strategic partners operate within a reliable financial environment that is fully aligned with current regulations.

At the same time, we have specific mechanisms for **legal risk** management that allow us to monitor and anticipate situations that could lead to litigation. When we receive notification of a legal proceeding, a report is triggered to the **Operational Risk** department for analysis, follow-up, and the definition of mitigation measures. Additionally, during the reporting period, **none of our subsidiaries** recorded any significant legal proceedings requiring disclosure.

Looking ahead, our commitment is to continue strengthening good corporate practices so that the Bank remains a benchmark in the sector: not only for its financial strength, but also for the way it conducts itself—always with ethics, compliance, and responsibility.

At Banco de Occidente, we operate under **solid ethical principles**, because we understand that integrity is not merely a compliance requirement: it is the foundation of trust and the way we conduct business. This commitment helps build a more equitable society and a more transparent economic system, promoting responsible practices that reinforce our values throughout our operations. This approach is supported by our **Internal and External Fraud Management Process Policy and is part of the ABAC program.**

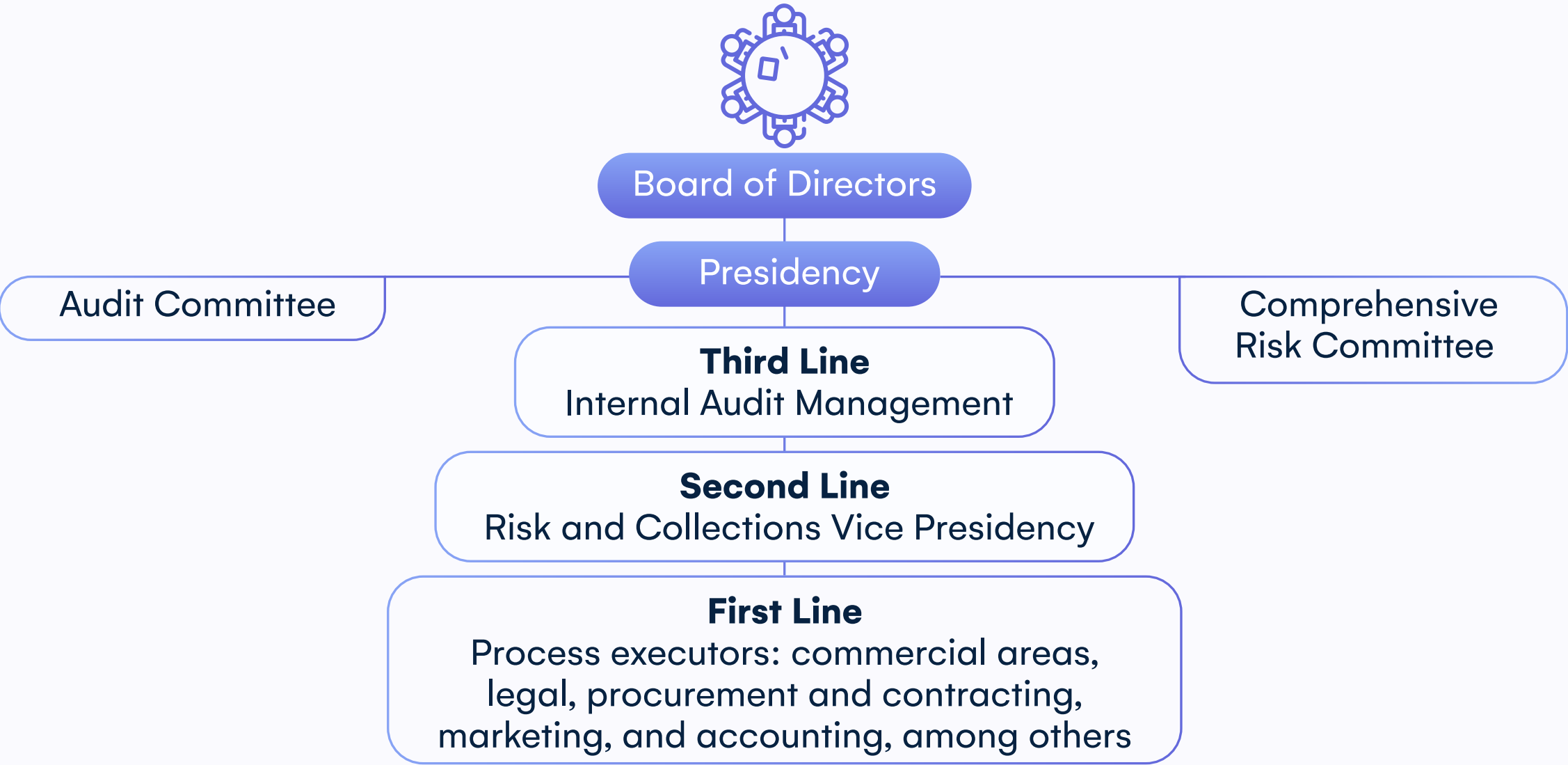
Anticorruption program

Our Fraud Management Process Policy and associated compliance initiatives aim to **prevent and mitigate legal and financial risks**, while strengthening market confidence and our relationships with our stakeholders. To this end:

- ✓ We implement rigorous **internal controls**;
- ✓ We conduct **regular training** on corporate values and business ethics for our employees;
- ✓ We develop **awareness-raising initiatives** for suppliers, promoting a culture of integrity throughout the value chain; and
- ✓ We have **confidential reporting channels** that facilitate the timely detection and management of any irregularities.

In this way, we foster a **transparent** business environment, aligned with our **ESG** strategy and continuously improving to address the challenges of a demanding and constantly evolving regulatory landscape.

The guidelines in this area are defined by **Grupo Aval’s Senior Corporate Vice Presidency of Risk and Compliance**, and at the Bank, the implementation, oversight, and enforcement of anti-corruption management are supported by the following bodies:





Our **Board of Directors** assumes responsibility for **identifying and understanding** the risks associated with corruption. Within this framework, **it approves the Internal and External Fraud Management Policy** and monitors its implementation. Periodically, it receives **clear, comprehensive, and timely** information on the assessment of these risks, based on defined criteria that promote **continuous improvement**.

To manage these risks, we operate under a **three-lines-of-defense model**, designed so that each team has clarity regarding its role and knows how to contribute to safeguarding the Bank’s integrity:

Line of Defense	Actions
First line of defense: management from operations	The first line is closest to the day-to-day business. It is responsible for identifying, assessing, and managing the risks associated with the products, activities, processes, and systems under its responsibility. It consists primarily of the areas that interact directly with stakeholders and support operations, including commercial, administrative, procurement and contracting, and financial departments, among others, as well as those related to accounting. Its role is key because it allows risks to be prevented at the source and strengthens controls in day-to-day management.
Second line of defense: specialized oversight and support	The second line, comprising the Risk and Compliance departments, continuously monitors compliance with obligations and controls related to corruption risk. It works in coordination with the first line, supporting it in identifying risks, assessing controls, and evaluating their effectiveness to identify gaps, determine the level of residual risk, and facilitate the implementation of corrective and preventive action plans. These tasks are led by the Vice Presidency of Risk and Collections and, specifically regarding corruption, by the Banking Security Department, which coordinates investigations into potential policy violations and oversees the implementation of corrective and disciplinary actions.
Third line of defense: independent assurance	The third line conducts independent assessments of corruption risk management and related processes and systems, submitting periodic reports to the Audit Committee. This assurance helps strengthen the confidence of investors and other stakeholders by providing an objective view of the effectiveness of controls, the transparency of processes, and alignment with international standards. The findings and recommendations resulting from these reviews allow us to continue strengthening our governance practices, improve risk management, and reinforce our commitment to ethics and sustainability.



For this model to work, we promote an ethical culture in which we all play a role. That is why we provide training for employees (and for certain suppliers who act as intermediaries with public entities and officials) to reinforce our commitment to transparency. In 2025, 100% of employees completed the annual online course on the Anti-Corruption and Bribery Corporate Policy (ABAC), and the ABAC culture survey administered to key personnel achieved a 100% completion rate. thereby strengthening our

due diligence processes to ensure that business relationships and sensitive transactions are managed with transparency and with controls commensurate with the level of risk. Within this framework, the Risk department reviewed both special operations and Third-Party Intermediaries (TPIs) linked to the operation, issuing a favorable opinion in all cases. This exercise strengthens accountability and the trust of our stakeholders by verifiably supporting our risk prevention and mitigation practices.



The ABAC policy also allows us to prioritize those activities that, due to their nature, may involve **greater exposure** to the risk of corruption. These include **donations, sponsorships**, contributions to **social programs** under the sustainability model, the **acceptance and/or giving of gifts and invitations, public or political contributions, and merger or acquisition** processes.

For these types of transactions, we apply comprehensive and traceable controls: in 2025, due diligence was conducted on **100% of executed transactions, totaling 289 assessments**. This figure increased compared to the previous year (284), reflecting a rise in the volume of transactions subject to this analysis. In all cases evaluated, it was verified that none of the transactions posed a corruption risk to the Bank.

In addition, we assessed suppliers who, due to the nature of the service provided, were classified as **TPI**, with the aim of determining their **risk level** and defining the scope of the due diligence required to mitigate it. The number of transactions assessed was:

Year	No. of Transactions Where Corruption Risk Assessments Were Conducted	% of Transactions Where Corruption Risk Assessments Were Conducted
2025	289	100%
2024	284	100%
2023	146	100%

Below we present the main **corruption risks** identified under our **risk management model**, along with the **regulatory parameters** that govern them and the **control and mitigation measures** implemented to prevent, detect, and manage them in a timely manner.

Operation assessed	Description of identified risk	Measures Implemented
A B A C S p e c i a l Operations (donations, sponsorships, contributions to social programs under the sustainability model, acceptance and delivery of gifts or invitations, mergers or acquisitions)	Offering, giving, promising, and receiving economic benefits, gifts, grants, offers, and promises of payment of anything of value to carry out, expedite, delay, or favor commercial and contracting processes with third parties. Offering, promising, and delivering, directly or indirectly, money, items of value, or in-kind contributions with a social orientation, donations, sponsorships, and public or political campaigns for the purpose of obtaining an undue benefit.	All departments responsible for the process have been trained on the risks posed by this type of transaction and the due diligence required for each one. Additionally, the Risk Department conducts ongoing monitoring to ensure compliance with established policies and procedures.
R e l a t i o n s h i p s with Third-Party Intermediaries	Establishing relationships with third-party intermediaries (TPIs) to circumvent the entity's established policies through corrupt acts.	As part of the supplier onboarding and updating process, due diligence is conducted prior to contracting a supplier to identify the level of exposure to corruption risks that contracting the third party may entail, as well as the monitoring that must be carried out while the business relationship between the parties exists. As part of the contracting process, the third party agrees to comply with anti-corruption regulations and commits to our zero-tolerance policy toward bribery and corruption.





To complement the preventive and corrective actions described above, in 2025 we strengthened the **ABAC communications and training plan** with measures focused on reinforcing, in a practical and accessible way, our principle of **zero tolerance** for bribery and corruption. Within this framework, we conducted activities for all employees and updated the virtual course material, incorporating **specific anti-bribery and corruption () content and practical** case studies tailored to the positions and areas most exposed to ABAC risks, to facilitate a more practical understanding in day-to-day operations.

In addition, to ensure continuous and traceable monitoring of the program, the **ABAC Officer submits a semi-annual management report to the Board of Directors**, detailing progress, results, and opportunities for improvement, thereby strengthening oversight and fostering continuous improvement in policy compliance.

Complementarily, and as part of the controls to mitigate corruption risks in our relationships with third parties, whenever we engage or renew a supplier classified as a **Third-Party Intermediary (TPI)**, we expressly request their commitment to the Bank's ABAC policy. This commitment is formalized through an **anti-corruption clause** incorporated into contracts and is accompanied by clear information on the policy's main guidelines. Through this, we seek to ensure that our operations—both internal and with third parties—are conducted in accordance with the principles of **integrity and transparency**.

Below is a chart showing the **operations evaluated**, which reflects the scope of these actions within the ABAC strategies and their contribution to strengthening risk management and regulatory compliance. Stakeholder groups to whom the anti-corruption policies and procedures were communicated:

Year	Members of the governing body		Employees		Business partners	
	Number	Percentage	Number	Percentage	Number	Percentage
2025	9	100%	7054	100%	111	100%
2024	10	100%	7020	100%	310	100%
2023	10	100%	6984	100%	1779	100%
2022	10	100%	7113	100%	1551	100%

- ✓ In accordance with the **ABAC communications and training plan**, we conducted activities aimed at reinforcing the principle of **zero tolerance** for bribery and corruption among **all employees**. Additionally, we updated the virtual training materials to include **case studies** tailored to positions and areas with the highest exposure to ABAC risks.
- ✓ On a **semi-annual** basis, the **ABAC Officer** presented the ABAC program management report to the **Board of Directors**, ensuring follow-up and continuous improvement.
- ✓ Whenever a supplier classified as a **Third-Party Intermediary (TPI) was onboarding or renewing** their contract, we requested their express commitment to our ABAC policy, included the **anti-corruption clause** in the contract, and shared the policy's main guidelines.

Year	Members of the governing body		Employees	
	Number	Percentage	Number	Percentage
2025	9	100%	7054	100%
2024	10	100%	6984	100%
2023	10	100%	7113	100%
2022	10	100%	7113	100%



Culture of Integrity

| GRI 2-26; SASB FN-CB-510a.2. |

At the Bank, we manage ethics and compliance as part of our daily operations, with clear rules and mechanisms that facilitate timely action. To this end, we have the **Code of Ethics and Conduct and the Internal Work Regulations**. Upon joining the Bank, and each time these documents are updated, all employees **sign a commitment to conduct and compliance**, reaffirming the standards that guide the way we work.

When a situation is identified that may constitute a breach of these standards, employees are required to **report** it through the appropriate channels, as applicable: their **immediate supervisor, the Vice Presidency of Human Resources, the Internal Audit Department, the Compliance Department, or the Bank Security Department**. This framework strengthens our culture of control and risk mitigation and supports the trust of customers, shareholders, and other stakeholders.

Furthermore, we believe in **equality as a right and in equity as a guiding principle** of our organizational identity. In our labor relations, we promote an environment **free of discrimination**, and during the period, **we did not record any cases** of this nature.

Ethics Hotline – Whistleblowing Mechanism

The **Ethics Hotline** is our **confidential and anonymous** channel for reporting situations that may compromise the institution's standards. It is available to **employees, customers, users, suppliers, contractors**, and anyone who wishes to report incidents related to **fraud, corruption, bribery, money laundering**, or other irregular conduct, including potential **conflicts of interest**. Its purpose is to facilitate the **prevention, detection, and mitigation of risks**, while protecting the confidentiality of the information and the identity of the whistleblower.

Through this channel, the following incidents, among others, can be reported:

- ✓ Inappropriate use or misappropriation of the Bank's assets;
- ✓ Conduct contrary to the values and principles established in the **Codes of Ethics, Conduct, and Good Governance**;
- ✓ Violation of internal rules or policies;
- ✓ Improper disclosure of confidential information.

The Ethics Hotline is managed by the **Internal Audit Department**, which guarantees the confidentiality of reports and the proper administration of the channel. The Ethics Hotline is available on the **Bank's website**, making it accessible to the general public. Its existence and operation are communicated **every six months** via email to customers, suppliers, and employees, and are also published on the website.

Once a report is received, the **Internal Audit Department** conducts an initial analysis and refers the case to the responsible departments, setting a reasonable deadline for follow-up and reporting of results. In complex situations, external specialists—such as forensic auditors—may be consulted to conduct a more in-depth analysis. If irregularities are confirmed, the relevant departments, such as the **Labor Relations Department**, handle the case and apply the appropriate measures and sanctions in accordance with the Bank's policies.

All complaints received are investigated, and once the analysis is complete, they are presented to **the Audit Committee**. Additionally, a report is prepared **twice a year** detailing the number of complaints received and how they were handled. Beyond investigating, Internal Audit also monitors and analyzes root causes to strengthen the ethical culture and continue improving internal processes.

Ethics Hotline | Banco de Occidente





Number of concerns and types of requests for advice received:

Class	2025	2024	2023	2022
Complaints via the Bank's Ethics Hotline (Bank + subsidiaries)	154	183	173	139
Complaints via Grupo Aval Ethics Hotline	33	12	18	20
Total complaints	187	195	191	159

This breakdown allows us to identify trends and prioritize improvement actions:

Type of requests	2025	2024	2023	2022
Potential conflicts of interest	—	2	1	—
Workplace environment issues	37	42	54	34
Unfair business practices (document tampering, poaching of new customers outside of authorized databases, non-compliance with procedures, application failure)	19	12	26	33
Customer complaints and requests	52	72	61	48
Information provided in the complaint is insufficient/ Channel evidence	79	67	49	44
Total requests	187	195	191	159

In **2025**, we continued to strengthen the **Ethics Hotline** as an accessible and trustworthy channel for listening, responding, and learning. Overall, the total volume of reports remained **stable, with 187 complaints** compared to 195 in 2024 (a decrease of **8 cases**, equivalent to **-4,1%**). Looking at the breakdown, a significant change is observed: complaints received through the **Bank + subsidiaries** channel fell from **183 to 154 (-15,8%)**, while those recorded through the Grupo Aval channel increased from **12 to 33 (175%)**. This trend suggests greater use of the corporate channel and reinforces the importance of maintaining integrated and consistent case management, regardless of the point of entry.

Upon examining the types of requests in greater detail, the main finding for 2025 is that reports in which the **information provided was insufficient or lacked supporting evidence** increased from **67 to 79 (17,9%)**. This category became the most prevalent of the year, and sets a clear priority for us: **to better support those who submit reports** by providing simpler guidelines on what information to include, practical examples, and adjustments to the forms to facilitate a complete and verifiable account from the outset. At the same time, **customer complaints and requests** decreased from **72 to 52 (-27,7%)**, and reports regarding the work environment fell from **42 to 37 (-11,9%)**, reflecting a reduction in these areas compared to the previous year. On the other hand, alerts regarding poor business practices increased from **12 to 19 (58,3%)**, an issue we continue to address with special attention due to its direct relationship with service, controls, and the customer experience. Finally, in 2025, no **potential conflicts of interest** were recorded (in 2024, 2 were reported).

Based on these results, our focus moving forward is twofold: on the one hand, **to improve the quality and completeness** of reports (to act more quickly and effectively) and, on the other, **to deepen the root-cause analysis** of categories that have grown or remained steady, such as unfair commercial practices.

This involves strengthening communication within the channel, simplifying reporting guidelines and fields, and using each case as input for continuous improvement, so that the Ethics Hotline is not only a reporting mechanism but also a concrete tool for strengthening integrity, prevention, and trust.

Membership in Associations

SDG 17.5 | GRI 2-28; 415-1 |

We actively participate in various associations and organizations, both nationally and internationally, contributing our experience and supporting initiatives relevant to the sector and the country. Below, We hereby present the affiliations that have made the most significant contributions:

Organization	Focus	Geographic Location
Asobancaria	To be part of the most representative association in the Colombian financial sector	Capital District, Bogotá D.C.
ANIF	Contributing to the maintenance and operation of the National Association of Financial Institutions	Capital District, Bogotá D.C.
ProBarranquilla	Through this affiliation, we seek to support the regional development and growth of businesses and their stakeholders in partnership with the mayor’s office and the Atlántico Governor’s Office to develop projects and create jobs. Additionally, through this partnership, we are building a space for participation and influence in the region.	Atlántico, Barranquilla.
Vallecaucana Action Unit	To promote the region’s progress, democracy, and good governance.	Valle del Cauca, Cali
Propacífico	To promote the operation and development of the foundation’s mission, which drives high-impact projects and initiatives that contribute to the comprehensive and sustainable development of Cali, Valle del Cauca, and the Colombian Pacific.	Valle del Cauca



Item	2025	2024	2023	2022
Lobbying, advocacy, or similar	0	0	0	0
Political campaigns/organizations/local, regional, or national candidates	0	0	0	0
Trade associations or tax-exempt groups (e.g., think tanks)	\$1.111.626	\$1.156.255	\$1.111.626	\$1.064.014
Others (e.g., expenses related to elections or referendums)	0	0	0	0
Total contributions and other expenses	\$1.111.626	\$1.156.255	\$1.111.626	\$1.064.014
Data coverage (as a % of the denominator, indicating the organizational scope of the reported data)	100%	100%	100%	100%

The Bank makes financial contributions to trade associations, **professional** guilds, and other **tax-exempt** organizations in accordance with our internal policy and applicable regulations. We do not participate in **political campaigns, referendums, or electoral- e measures**, nor do we hire lobbying groups. Below is a breakdown of our investments for **2025**:



Stakeholder engagement

| GRI 2-29 |

We maintain close relationships with our various stakeholders to promote **transparency, enrich decision-making**, and build long-term relationships based on trust. To this end, we use various communication channels—such as **newsletters, presentations, emails, and social media**—with a frequency determined by the needs and characteristics of each group.

Stakeholder	Characteristics	Channels	Frequency
Customers	Corporate Banking (government, institutional, corporate, medium-sized, large enterprises, SMEs); Personal Banking (Elite Plus, Elite, Preferente Plus, Preferente)	Email and Social Media	Monthly / On demand
Government and Regulatory Bodies	Superintendency of Industry and Commerce; Financial Superintendency; Central Bank of Colombia; Colombian Stock Exchange	Legal contact mailbox	Quarterly
Governing Bodies	Board of Directors; Steering Committee	Board of Directors / Sustainability Steering Committee	Biweekly / Quarterly
Opinion Leaders	Public opinion; Mass media; Alternative media	Traditional media	On demand
Team	Collaborators; Affiliates; Fondoccidente; Union	Corporate mailboxes	On demand
Communities	Planeta Azul Community; Social Media Users; Universities; Entities Supported by Social Investment	Planeta Azul email, bank social media, and bank mailbox (selection and sustainability)	Monthly / On-demand
Associations	Asobancaria; Asofondos; Anif; Chambers of Commerce	Bank Mailbox	Quarterly
Shareholders	Grupo Aval; Shareholders' Meeting	Website and shareholders' meeting / Email	Annual / On demand
Suppliers	Logistics	Bank mailbox	Quarterly
Partners	WWF; Correspondents; ADL; Dale!; GPTW; Second-Tier Banks (Bancoldex, Finagro, Findeter); IDB; Product Partners (UNICEF, dealerships, construction companies, etc.)	Bank mailbox	Quarterly



Action: for the Planet



Banco de
Occidente

Grupo
AVVALL



Emissions Management and Climate Change



SDG 7.3; 13.2; 15.1

Climate change represents one of the main long-term environmental and financial challenges. At Banco de Occidente, we address this challenge in a structured manner, integrating **climate strategy and decarbonization** as cross-cutting pillars of **our environmental and risk management**. Our approach combines the progressive reduction of greenhouse gas (GHG) emissions, the efficient use of resources, and the integration of climate-related criteria into decision-making, with the aim of strengthening organizational resilience, supporting our clients in their transition, and contributing to the sustainable development of the regions where we operate.

Within this framework, we are making consistent progress in defining goals, metrics, and action plans aligned with international benchmarks, prioritizing data-driven management, continuous improvement, and transparency toward our stakeholders.

As a financial institution, we understand that our climate impact extends beyond our direct operations and is largely realized through the sectors, projects, and activities we finance. In this regard, the management of financed emissions is a key component of our climate strategy, as it allows us to understand, manage, and support the transition of our portfolio toward more sustainable and climate-resilient production models.

To advance this objective, we have been progressively strengthening our technical and analytical capabilities, integrating climate criteria into portfolio management, and aligning with recognized international standards.

For more detailed information on the Bank's approach to the **risks and opportunities associated with climate change**, as well as the methodology, scenarios, and results of the climate analysis, please refer to **Annex 3 — TCFD Report**, which provides additional information on our climate strategy, risk management, and climate performance measurement.



Our GHG Emissions



SDG 7.3; 11; 13.2

As part of our environmental and eco-efficiency strategy, we are making steady progress in managing and reducing greenhouse gas (GHG) emissions associated with our operations and our value chain. Within this framework, we have defined clear reduction targets, which include a **42% reduction in Scope 1, 2, and 3 GHG emissions by 2030**—equivalent to a **5,25% overall reduction** and a **1,75% annual reduction for each scope**—and subsequently achieving **carbon neutrality by 2050**, in line with global efforts to limit the temperature increase to 1,5°C. To support these commitments, in recent years we have strengthened our processes for measuring, monitoring, and analyzing Scope 1, 2, and 3 emissions, as well as our internal capabilities for informed decision-making.

In addition, we continue advancing in the technical and methodological review required for the future validation of targets under the **Science Based Targets initiative (SBTi)**, actively participating in training and sectoral dialogue forums that enable us to consolidate a comprehensive understanding of this process and the actions necessary for its implementation.

Achievements of our 2025 Management Plan

- ✓ **Maintenance of our Carbon Neutrality certification**, reaffirming our commitment to responsible emissions management and offsetting.
- ✓ **GHG emissions inventory verified by ICONTEC**, ensuring the reliability, traceability, and quality of reported information, in accordance with recognized standards.
- ✓ During the period, we continued to strengthen our internal capabilities for the eventual submission and validation of targets under the **Science Based Targets initiative (SBTi)**.

In this context, we actively participated in webinars and training sessions led by organizations such as the **Global Compact and Asobancaria**, aimed at deepening our understanding of the process and associated technical requirements.

- ✓ A **28,9% reduction in total emissions compared to 2024** and approximately **44%** compared to the 2022 baseline.
- ✓ Significant reduction in **Scope 1 emissions**, driven by optimized fuel consumption and efficient refrigerant management.

- ✓ A **58% reduction in Scope 2 emissions**, driven by energy efficiency and a favorable change in the emission factor of the National Interconnected System.
- ✓ Sustained reduction in **Scope 3 emissions** associated with lower paper consumption, waste reduction, and optimization of outsourced transportation.
- ✓ Increase in renewable energy consumption, reaching **198,09 MWh in 2025**, contributing to reduced emissions from electricity consumption.





Carbon Footprint

| GRI 305-1; 305-2; 305-3; 305-4; 305-5 |

Methodological Approach

Measuring our carbon footprint is a fundamental step toward **responsibly managing our climate impact** and guiding decisions that drive the Bank’s decarbonization. Therefore, we have developed a quantification process that is consistent and comparable over time, allowing us to understand where our emissions are generated and how we can progressively reduce them.

The calculation of our greenhouse gas (GHG) emissions is carried out in accordance with the **GHG Protocol**, the most widely used international standard, applying an **operational control** approach, meaning we include those operations over which the Bank has the authority to implement policies and management measures. Based on the identified emission sources, this calculation incorporates the main greenhouse gases, including **carbon dioxide (CO₂)**, **methane (CH₄)**, **nitrous oxide (N₂O)**, and **refrigerant gases such as SF₆, HFCs, and HCFCs**, allowing us to reflect our climate impact more comprehensively and accurately.

Our carbon footprint includes **Scope 1, 2, and 3** emissions, providing a comprehensive view of our climate impact:

- ✓ **Scope 1:** direct emissions primarily associated with fuel consumption from mobile sources (the Entity’s own vehicles) and stationary sources (power plants), as well as fugitive emissions from refrigerants in air conditioning systems and gases contained in fire extinguishers.
- ✓ **Scope 2:** indirect emissions resulting from the consumption of electricity purchased for our offices and administrative headquarters.
- ✓ **Scope 3:** Indirect emissions relevant throughout the upstream and downstream value chain, including categories such as purchased goods and services, paper consumption, business travel (ground and air), employee commuting, waste generated in operations, fossil fuel consumption in courier services, and cash-in-transit and logistics.

To calculate emissions, we use **nationally and internationally recognized emission factors**, prioritizing those specific to Colombia when available, and updating them periodically to reflect changes in the energy mix and system conditions.

We have defined **2022 as the base year**, as we have consistent and traceable information that allows us to make robust comparisons and track our reduction targets. We continuously work to improve data coverage and quality, strengthening the systems for collecting, validating, and consolidating environmental information.



GHG emissions measurement **covers 100% of the data** for Scopes 1, 2, and 3. For fiscal year 2025, the Bank set emission targets of **1.102,77 tCO₂e (Scope 1)**, **2.344,27 tCO₂e (Scope 2)**, and **3.485,54 tCO₂e (Scope 3)** as the basis for monitoring and evaluating its climate performance.

Below is a summary of GHG emissions generated in 2025:

GHG Emissions Generated						
Unit: Tons of CO ₂ e	Fiscal Year 2025 Target	2025	2024	2023	2022	2021
Scope 1	1.102,77	886.86	1.104,52	1.379,49	1.540,20	2.010,22
Scope 2	2.344,27	1.002.48	2.386,03	1.992,65	1.396,26	1.694,59
Scope 3	3.485,54	3.144.11	3.547,63	4.023,15	6.103,38	14.003,62
Total Emissions		5.003.45	7.038,18	7.395,29	9.039,84	17.708,43
Data Coverage		100%	100%	100%	100%	100%

*GHG emissions figures in metric tons of CO₂equivalent (tCO₂e).

For **Scope 2**, we report emissions associated with electricity consumption using both **location-based method and market-based method**, in accordance with **GHG Protocol** guidelines. This dual method allows us to transparently reflect both the intensity of the national electricity grid and the impact of our operational decisions.

For **Scope 2**, we report location-based and market-based emissions as follows:

Scope 2 Emissions Generated						
Unit: tons of CO ₂ e	Target Fiscal Year 2025	2025	2024	2023	2022	2021
Location-based method	2.344,27	1.002,48	2.386,03	1.992,65	1.396,26	1.694,59
Data coverage		100%	100%	100%	100%	100%
Market-based method*	2.344,27	1.002,48	2.386,03	1.992,65	1.396,26	1.694,59
Data coverage		100%	100%	100%	100%	100%

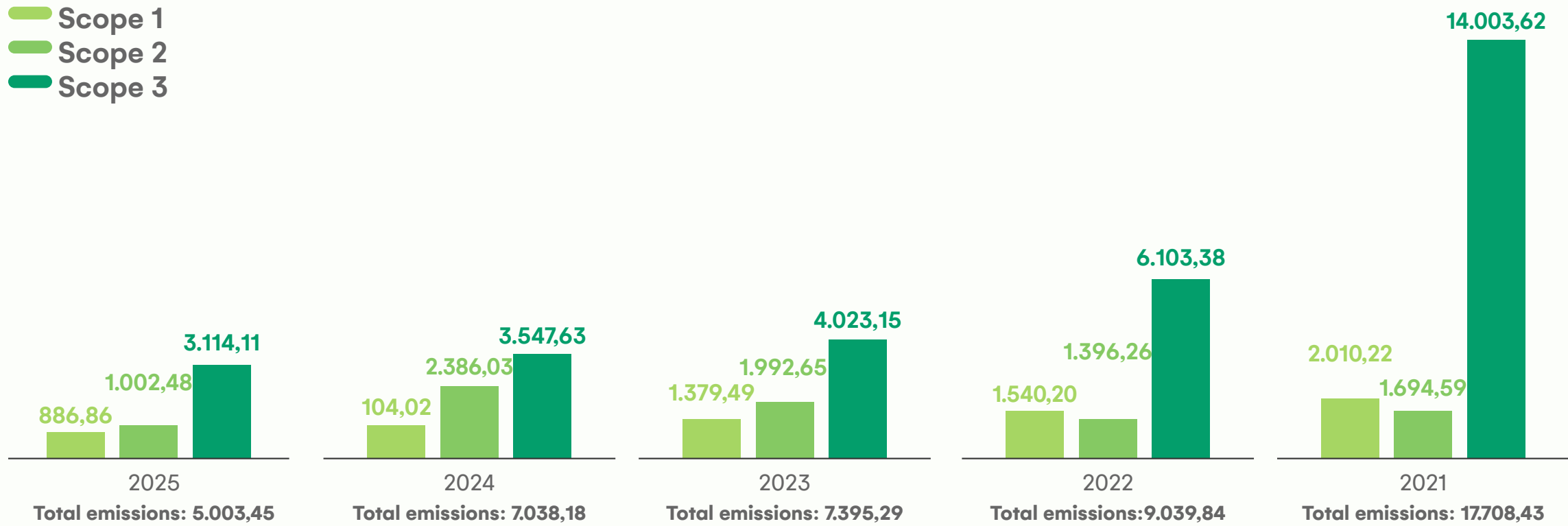
*Note for 2025: Our energy investments: We are driving the transition by installing solar panel systems in our offices, resulting in renewable energy consumption of 198.09 MWh, equivalent to 19.22 tCO₂.

The reported information **covers 100% of the data** for all years analyzed. In 2025, Scope 2 emissions reached **1.002,48 tCO₂e**, showing a significant reduction (58%), driven by a 55.76% decrease in electricity consumption compared to 2024, the strengthening of energy efficiency initiatives, and the change in **the emission factor of the National Interconnected System**, published by XM.

For **fiscal year 2025**, the Bank set a target for this scope of **2.344,27 tCO₂e**, which allows for continuous monitoring of the performance and progress of our emissions management strategy.

The following are the key metrics of our carbon footprint:

Total GHG Emissions



*GHG emissions figures in tons of CO₂equivalent (tCO₂e).

Between 2022 and 2025, total **GHG emissions decreased from 9.039,84 to 5.003,45 metric tons of CO₂ equivalent**, representing a cumulative reduction of approximately **44,65%** compared to the baseline (2022). This trend confirms a progressive improvement in our climate performance and establishes 2022 as a turning point from which a more rapid and consistent reduction can be observed.

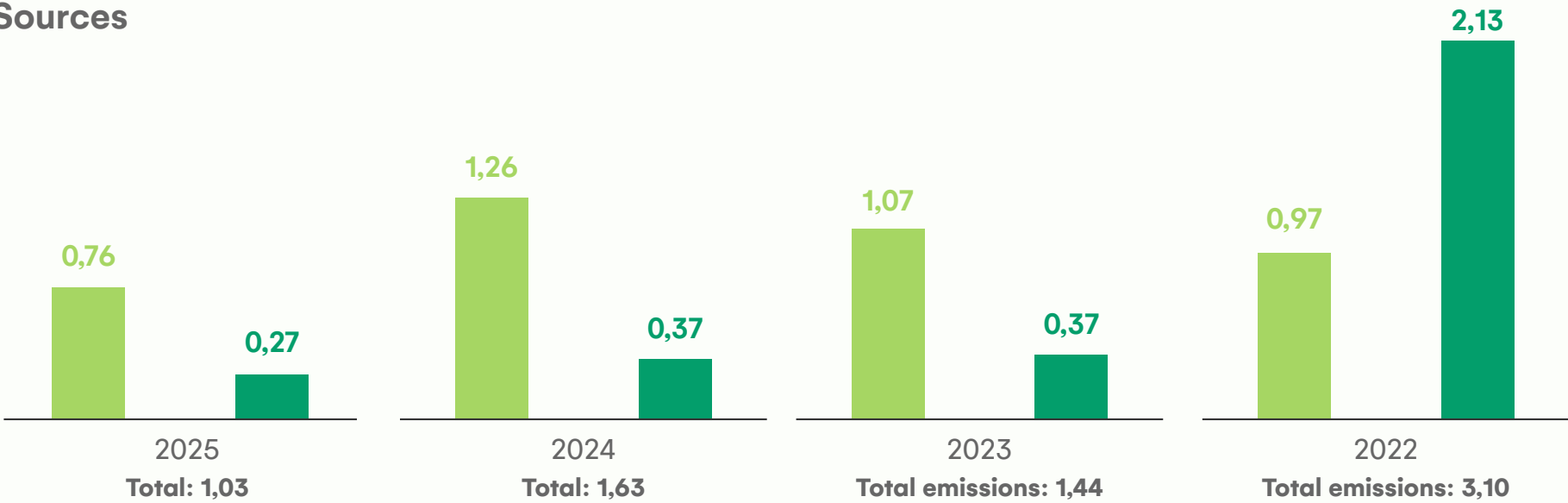
The reduction is mainly explained by the **progressive decline in Scope 1 and 3 emissions**, associated with improved fuel consumption management, resource optimization, and advances in value chain management. In **Scope 2**, although there are variations are observed between years, a significant decrease occurred in 2025, aligned with strengthened energy efficiency initiatives and the increased use of renewable energy.





Biogenic emissions

Fixed Sources
Mobile Sources



*GHG emissions figures in tons of CO₂equivalent (tCO₂e).

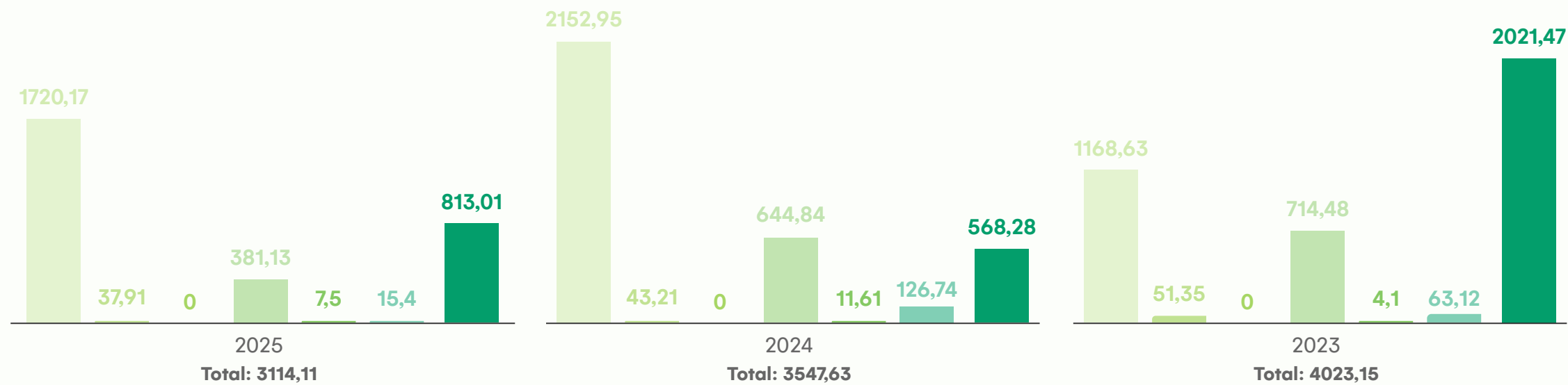
The trend in biogenic emissions shows an overall downward trend between 2022 and 2025, reflecting improvements in fuel consumption management associated with the Bank’s stationary and mobile sources.

The variation observed in this indicator is directly related to fuel use in stationary sources, primarily

power plants, and in mobile sources corresponding to the Bank’s own vehicles. In 2025, there is a significant decrease in biogenic emissions, explained by the reduction in fuel consumption at power plants, in parallel with more efficient management of fuel consumption across the Bank’s four vehicle fleets.

Indirect GHG emissions by category for Scope 3

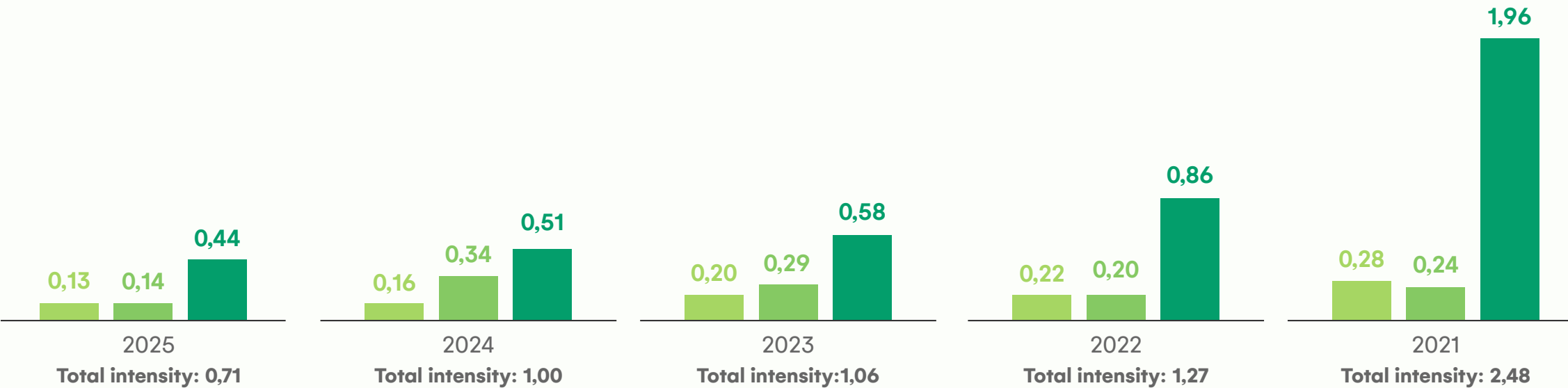
- Purchased goods and services
- Capital goods
- Fuel-and-energy-related-activities (not included in Scope 1 or 2)
- Upstream transportation and distribution
- Waste generated in operations
- Business travel
- Employee commuting



*GHG emissions figures in metric tons of CO₂equivalent (tCO₂e).

GHG Emissions Intensity

- Scope 1 GHG emissions intensity
- Scope 2 GHG emissions intensity
- Scope 3 GHG emissions intensity



*GHG emissions figures in tons of CO₂equivalent per employee (tCO₂e/employee).

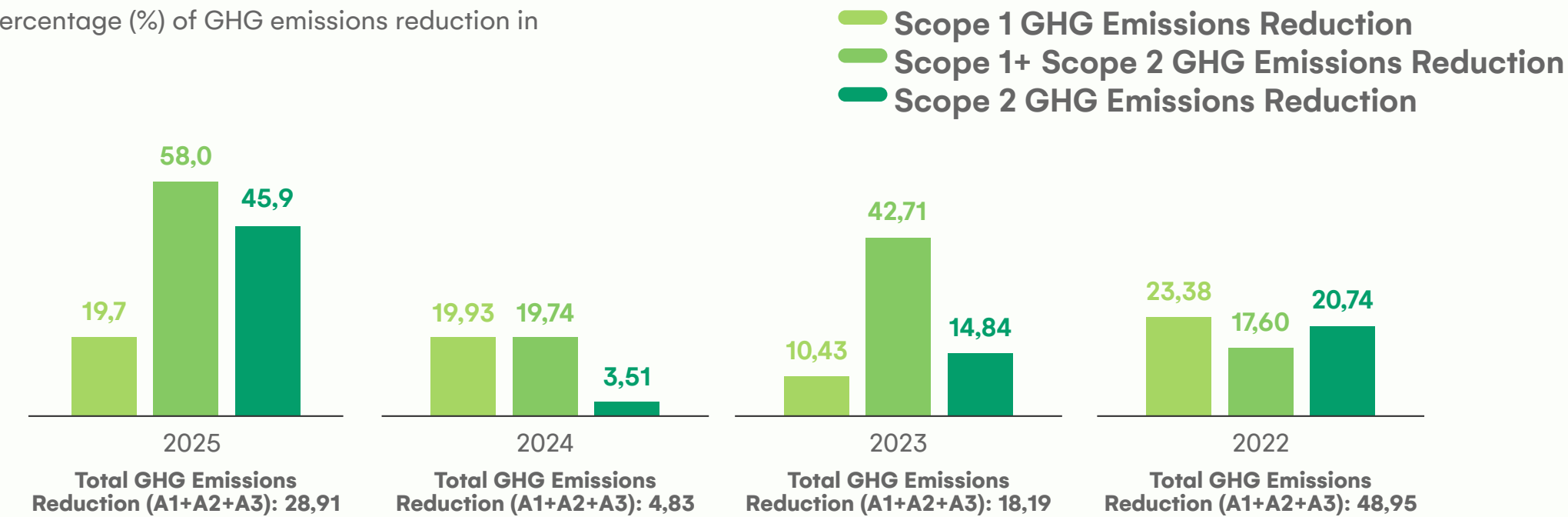


The trend in GHG emission intensity indicators, calculated as the ratio of **total emissions to the total number of employees**, demonstrates a sustained **improvement in the Bank's climate performance**, showing a gradual reduction in emissions relative to our operational metrics.

Between 2021 and 2025, total emissions intensity decreased from 2.48 to 0.71, confirming that the reduction in emissions is not only due to lower absolute values but also to greater operational efficiency. This trend reflects the integration of climate management criteria into decision-making and process optimization.

The reduction is mainly explained by the decrease in Scope 3 emissions intensity, which has historically represented the largest component of the indicator, as well as by consistent improvements in Scopes 1 and 2. In particular, a trend toward stabilization and reduction in intensity has been observed in recent years, aligned with energy efficiency initiatives, optimization of fuel consumption, and strengthened value chain management.

*Figures in percentage (%) of GHG emissions reduction in



metric tons of CO₂equivalent (tCO₂e).

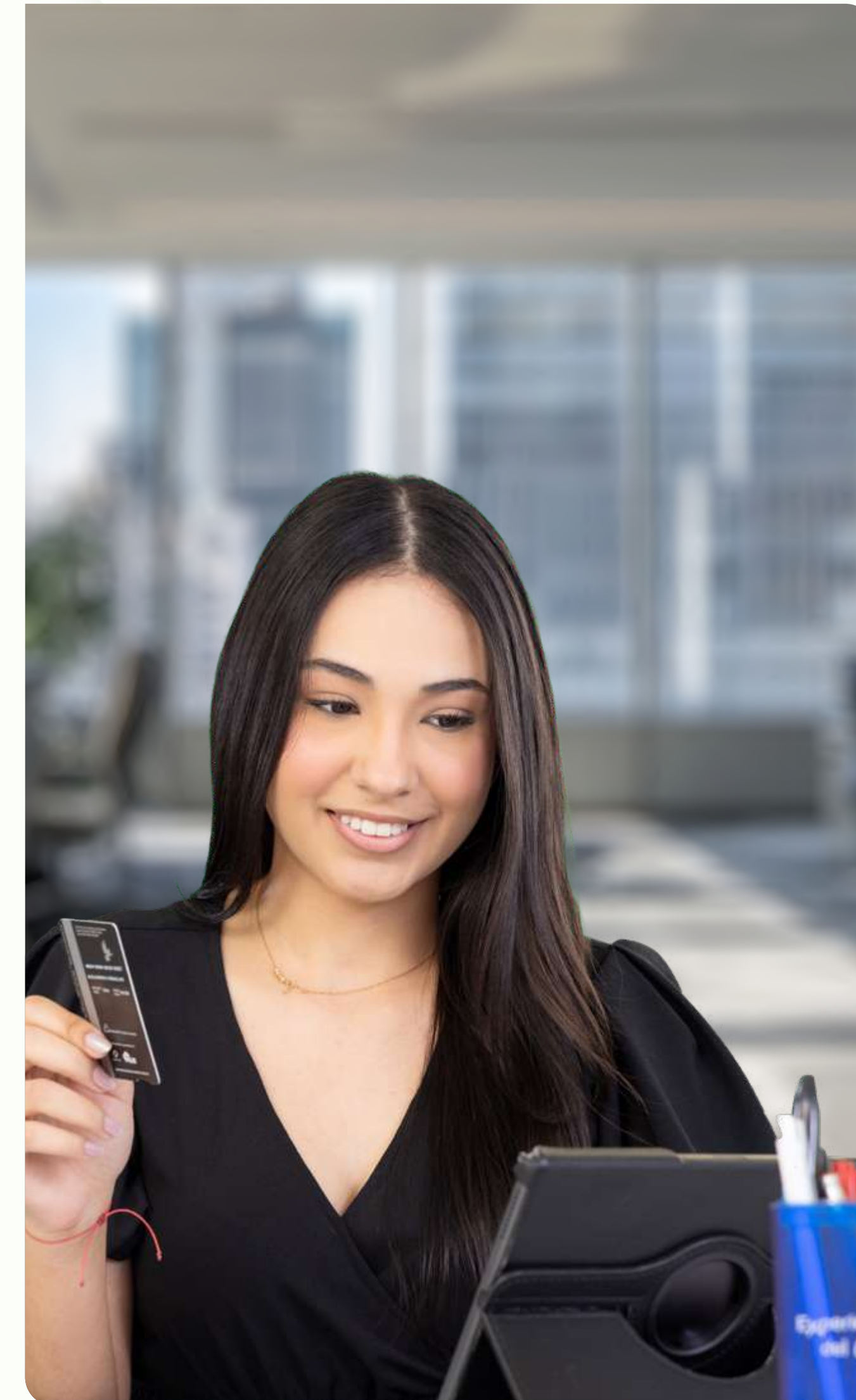
In 2025, we made significant progress in **reducing greenhouse gas emissions**, reflecting the impact of actions implemented consistently across the different scopes and strengthening our emissions management strategy.

Under **Scope 1**, the reduction in emissions is primarily due to lower fuel consumption from **mobile sources**, as well as more efficient management of **refrigerants used in air conditioning systems**. Additionally, ongoing **preventive maintenance** helped prevent leaks and reduce fugitive emissions, directly contributing to improved performance under this scope.

In **Scope 2**, the reduction observed in 2025 is due to lower electricity consumption, combined with a change in the **emission factor of the National Interconnected System**, published by XM, which showed a **55,76% reduction compared to 2024**. This combination of factors resulted in a **58% decrease in Scope 2 emissions**, positively impacting the overall result of our carbon footprint.

Meanwhile, a significant reduction in emissions was achieved for **Scope 3**, primarily due to the **decrease in paper consumption, the reduction in waste generation**, and more efficient management of **outsourced transportation**. Regarding employee transportation to and from the Bank, there was a slight increase, associated with both the hybrid work model and the strengthening of our **Sustainable Mobility Program**, which continues to focus on optimizing these commutes in the medium term.

Overall, our **total emissions were reduced by 28,9% compared to 2024**, and by approximately **44% compared to the 2022 baseline**. These results reflect the impact of the initiatives and actions implemented during 2024 and 2025, and put us on a positive path toward meeting the reduction targets established under the **2030 Agenda, our Emissions Management Plan, and the Operational Eco-efficiency Plan**.





Between **2023 and 2025**, we strengthened our commitment to renewable energy through the implementation and expansion of solar panel systems at our offices. In 2025, this effort resulted in increased renewable energy consumption and a significant reduction in associated emissions, directly contributing to the decrease in our Scope 2 emissions.

Year	Renewable energy consumption (MWh)	Avoided associated emissions* (tCO ₂ e)	Target
2025	198,09	19,22	Expansion and increased use of solar energy.
2024	177,02	38,49	Continuity of generation with installed solar systems.
2023	182,67	39,63	Installation of solar panel systems in offices.

*Emissions calculated based on current emission factors from the National Interconnected System.

Financed Absolute Emissions — Scope 3

At Banco de Occidente, we understand that managing **financed emissions** is a key component of our sustainability strategy and our commitment to the transition toward a low-carbon economy. These emissions, classified as **Scope 3**, correspond to the climate impacts associated with financing provided through our products and services, and represent one of the financial sector’s main challenges and opportunities in the face of climate change.

Senior Management and the Sustainability Committee play a central role in overseeing this process, ensuring that the measurement and management of financed emissions are aligned with the Bank’s **Sustainability Strategy**, comprehensive risk management, and our long-term **decarbonization goals**. This strategic oversight allows us to progressively integrate climate criteria into decision-making and strengthen our portfolio’s resilience to transition risks.

We recognize that measuring financed emissions is an **evolving process** that requires continuous improvements in methodologies, data quality, and internal capabilities. In this regard, we adopt the **Partnership for Carbon Accounting Financials (PCAF)** standard and the Greenhouse Gas Protocol guidelines as our reference, taking into account emissions associated with loans and investments over which we have no operational or financial control.

As part of our commitment to decarbonizing our portfolio, we have conducted an initial assessment of financed emissions for the **2023 portfolio**, which includes **loans, investments, and insurance policies**. This assessment initially focuses on **sectors prioritized due to their higher exposure to climate risk**. Subsequently, with the aim of obtaining a more robust, consistent, and technically sound estimate, we decided to **expand the scope of the exercise to 100% of the commercial and consumer portfolio**, strengthening data quality, traceability, and consistency processes.

In **2025**, with the support of a specialized consultant, we **measured the financed emissions of the 2024 portfolio under this expanded scope**, in accordance with the **PCAF** standard and the **GHG Protocol** guidelines. This exercise allowed us to identify information gaps, opportunities for improvement, and needs for technical strengthening—fundamental elements for advancing in a structured and progressive manner in the portfolio’s climate management.

As a result, we continue to strengthen our internal capabilities to ensure increasingly reliable and comparable information, which will allow us, in the medium and long term, **to define clear, measurable, and achievable portfolio decarbonization targets**, as well as expand opportunities for sustainable financing and actively contribute to a more resilient economy aligned with global commitments on climate change.

Scope of the exercise:

- ✓ **100%** of the commercial and consumer portfolio.
 - ✓ **Personal Banking:** Mortgages and Auto Loans.
 - ✓ **Corporate Banking:** Project Finance and Commercial Loans.
- This exercise significantly expanded the scope compared to the initial measurement conducted in 2024 (2023 portfolio), providing **a more robust, consistent, and technically sound baseline.**

Measurement of absolute emissions financed under Scope 3 (A3)

Intensity of financed emissions — A3	2024	2023
Absolute financed emissions from A3	2.245.195,73	1.936.637,07
Portfolio coverage	98,38%	6,36%

*Figures in tons of CO2equivalent (tCO2e).

Retail and Corporate Banking Portfolio

Retail Banking			Corporate Banking		
Type	Total Emissions	Amount	Type	Total Issuances	Amount
Vehicles	286.291,00	\$ 2.337.301,17	Commercial Loans	1.621.535,39	\$ 20.130.565,08
Mortgages	2.335,34	\$ 1.898.313,16	Project Finance	335,034	\$ 6.521.848,95
Total	288.626,34	\$ 4.235.614,33	Total	1.956.569,39	\$ 26.652.414,03

*Figures in tons of CO2 equivalent (tCO2e).

*Economic figures in MM COP.

Portfolio data

Type	Amount	Coverage	Total CO2	Scope 1 + 2	Scope 3
Portfolio: individuals, vehicles	\$2.337.301,17	7,57%	286.291,00	286.291,00	0
Existing mortgage portfolio	\$1.898.313,16	6,15%	2.335,34	2.335,34	0
Portfolio managed: corporate banking, project finance	\$6.521.848,95	21,11%	335.034,00	149.406,20	185.627,74
Existing portfolio: corporate banking and commercial loans	\$20.130.565,08	65,17%	1.621.535,39	761.975,26	859.560,13
Total portfolio processed	\$30.888.028,36	98,38%	2.245.195,73	1.200.007,80	1.045.187,87
Total portfolio	\$31.396.611,26	100,00%			

*Figures in tons of CO2equivalent (tCO2e).





Data by sector of the commercial portfolio

Sector	Balance	Scope 1 + 2	Scope 3	Total
Agribusiness	\$ 1.512.253.426.767,09	216.702,76	178.665,68	395.368,44
Construction	\$ 3.884.635.208.722,82	25.354,61	137.205,67	162.560,28
Financial	\$ 4.385.572.610.500,48	2.432,42	6.589,72	9.022,14
Power Generation	\$ 1.724.926.845.011,45	228.341,99	56.651,35	284.993,34
Manufacturing	\$ 3.460.835.337.967,30	79.655,63	319.927,03	399.582,66
Oil & gas	\$ 1.082.340.433.704,97	101.599,09	62.754,50	164.353,59
Steel	\$ 176.787.370.666,83	3.691,49	9.870,04	13.561,53
Cement	\$ 197.813.602.166,33	28.157,94	21.208,34	49.366,28
Chemicals	\$ 339.812.316.354,18	48.959,26	38.109,81	87.069,07
Education	\$ 247.207.795.885,45	2.686,41	1.805,03	4.491,44
Other**	\$ 9.640.229.076.099,99	173.795,73	212.399,95	386.195,68
Total	\$ 26.652.414.023.846,90	911.377,33	1.045.187,12	1.956.564,45**

*Figures in tons of CO2equivalent (tCO2e).

Note** The total emissions figure in the table above shows a slight variation from the initially reported value due to adjustments resulting from rounding and decimal cleansing during the calculation. However, this difference does not alter the representativeness of the result, so the consolidated and technically valid value of emissions is: 1,956,569.39 tCO2e.

OTHER sectors include: Mining, Commerce, Hospitality and Tourism, Health, Public Sector, Public Utilities, Telecommunications, Personal Services, Business Services, Transportation, and Logistics.

Intensity of financed emissions

As part of our efforts to strengthen our climate management, we have incorporated an analysis of the **emissions intensity of the investments we finance, using the Weighted Average Carbon Intensity (WACI)** metric. This indicator allows us to understand our portfolio’s level of exposure to carbon-intensive activities from a financial perspective.

WACI is calculated based on the weight of each company or asset within the portfolio and its respective emissions intensity relative to its revenue. While this metric does not represent a direct link to actual emissions in the physical world, it does provide a relevant signal regarding the **portfolio’s climate risk profile**, which is particularly useful for strategic decision-making and transition risk management.

During the period analyzed, we observed a **significant evolution in portfolio coverage, rising from 6,36% in 2023 to 98,38% in 2024**, reflecting substantial progress in the availability and quality of the information used for this exercise. In 2024, the **total intensity of Scope 3 financed emissions stood at 0,07269 tons of CO2e per million COP (MCOP)**, establishing this indicator as a key baseline for future monitoring.

Intensity of financed emissions — A3	2024	2023
Total Scope 3 financed emissions intensity	0,07269	0,000000696
Portfolio coverage	98,38%	6,36%

*Figures in tons of CO2equivalent / MCOP.





Climate risk policies and management

The management of financed emissions is aligned with the Bank's main internal instruments:

✓ Sustainable Finance Policy

- Identification of sectors vulnerable to climate change.
- Mobilization of resources through the **Sustainable and Transition Taxonomy**.

✓ Environmental and Climate Change Policy

- Reduction of negative impacts.
- Identification of climate risks and opportunities.

✓ Environmental and Social Risk Management System (SARAS)

- Exclusion list for high-impact activities.
- Limits on exposure to intensive activities ($\leq 5\%$ of the portfolio).

Goals, challenges, and opportunities in financed emissions

The management of financed emissions is a strategic pillar in the evolution of our ESG strategy and in the transition process toward a portfolio aligned with a low-carbon economy. In this context, during **2025 we made progress in strengthening technical and information capabilities**, laying the groundwork for defining future decarbonization goals.

Opportunities

✓ **Transform climate impact analysis into a competitive advantage**, strengthening risk management, transparency, and the Bank's positioning in the financial market.

✓ **Support clients in their transition** by offering more sustainable financing alternatives and promoting practices that reduce their environmental impact and strengthen their resilience to climate change.

Challenges

✓ **Consolidate a solid and validated baseline** that allows for the definition of realistic, measurable, and comparable commitments over time, within a context of high methodological complexity and variable availability of information.

✓ **Progressively integrate the management of financed emissions into business decision-making**, ensuring consistency with the Bank's business strategy, risk appetite, and climate management.

Goals

✓ **2025 Goal (short term)**: Measure financed emissions corresponding to the 2024 portfolio, expanding the scope and coverage of the exercise. Result: Goal achieved. The measurement was carried out with the support of a specialized consultant, achieving 98.38% coverage of the portfolio and incorporating assets from Corporate Banking and Retail Banking under the PCAF methodology.

✓ **2026 Goal (short—medium term)**: Deepen the calculation of financed emissions with a higher level of granularity, especially in material areas and relevant sectors, strengthening the quality, consistency, and traceability of the information.

✓ **2026—2027 Goal (medium term)**: Define and establish portfolio decarbonization goals and targets based on a robust and reliable baseline, aligned with the Bank's strategy, risk management, and international best practices in sustainable finance.



Sustainable Mobility Program



SDG 9.3; 11; 13.2
| BdO-7 |

Our commitment to sustainable mobility was strengthened in 2025 through the optimization of the Try My Ride platform, which facilitates environmentally friendly transportation alternatives. Throughout 2025, this initiative established itself as a cornerstone of **our decarbonization strategy**, enabling us to mitigate indirect emissions while ensuring safer and more equitable commutes for **our employees**.

To encourage participation, we launched digital campaigns through our internal platform, the Try My Ride app, and company emails. These efforts were complemented by **in-person outreach events** at our administrative offices in **Bogotá and Cali**, where our partner presented the program, addressed questions, and promoted the use of alternatives such as carpooling, bicycles, and public transportation.

A significant milestone in 2025 was the **accreditation of the Corporate Sustainable Mobility Plan** by the Mobility Secretariats of **Bogotá and Cali**, successfully achieved in 2025. This recognition strengthens the alignment of our strategy with local public policies and validates the program's comprehensive approach.

In the second half of the year, we expanded the program's coverage to employees at the administrative offices in **Medellín and Barranquilla**, joining those already in place in Cali and Bogotá. This expansion was accompanied by a campaign to **award bicycles to the program's most outstanding users** and recognition activities, through which we celebrated our **third anniversary** alongside our employees.

Key Program Results

Thanks to the active participation of our employees, we closed 2025 with significant results:

- ✓ More than **2.000 registered users** on the Try My Ride app.
- ✓ More than **1.200 active participating employees**, **59%** of whom are women.
- ✓ Promotion of multiple sustainable mobility alternatives for commuting between home and work.
- ✓ **36,3 tons of CO₂e avoided in 2025**, equivalent to the CO₂ absorption of 1,212 trees.
- ✓ Cumulatively since 2022, more than **120 tons of CO₂e avoided**, equivalent to approximately **3.000 trees**.
- ✓ Generation of **savings exceeding \$84 million pesos** in public transportation fares during 2025.
- ✓ Contribution to **reducing harassment of women on public transportation**, promoting safer and more supportive journeys.

2026 Projection

Looking ahead to 2026, we will continue to strengthen the Sustainable Mobility Program by **expanding the number of users and published routes**, with the goal of increasing emissions avoided and continuing to contribute to environmental sustainability and the overall well-being of our employees.





Operational Eco-efficiency



SDG 6.4; 7.3; 13.1

Operational eco-efficiency is a key pillar of our environmental management, as it allows us to reduce the impact of our operations while enhancing resource efficiency. Through responsible management of **energy, water, waste, and paper consumption**, we seek to optimize processes, reduce associated emissions, and promote an organizational culture focused on the conscious use of resources.

Our approach combines the systematic measurement of environmental performance, the implementation of continuous improvement initiatives, and the participation of our employees. In this way, we are moving toward a more efficient and resilient operation, aligned with the Bank's long-term goals, the **Eco-efficiency Plan**, and the commitments of the **2030 Agenda**.



Energy Management

| GRI 302-1; 302-3; 302-4 |

Energy management is a central pillar of our operational eco-efficiency and a key enabler for reducing emissions associated with our operations. At Banco de Occidente, we address this challenge through a comprehensive approach that combines responsible energy use, efficiency in electricity consumption, and a progressive shift toward renewable sources, with the goal of transitioning to an increasingly sustainable operating model.

Our approach prioritizes the implementation of technological solutions, process optimization, and continuous monitoring of energy performance, aligning daily management with the goals defined in the Eco-Efficiency Plan, the 2030 Agenda, and

our decarbonization strategy. In this way, we seek to reduce dependence on non-renewable sources, improve energy efficiency, and strengthen an organizational culture focused on the conscious use of resources.

Looking ahead to 2030, we have set a goal to reduce our electricity consumption by 20%, using 2022 as the baseline year. To achieve this, we continuously promote eco-efficiency initiatives that enable us to achieve a minimum annual reduction of 2,5% in energy consumption.

Achievements of Our Management in 2025

During 2025, the Bank's energy management resulted in the following progress:

✓ **Sustained reduction in total energy consumption**, in line with the defined eco-efficiency goals.

✓ **Reduction in electricity consumption** as a result of energy efficiency projects implemented in offices and headquarters.

✓ **Increase in energy consumption** from renewable sources, driven by the continuous operation of solar panel systems in our offices.

✓ **Significant reduction in non-renewable energy consumption** associated with the vehicle leasing program and preventive maintenance of power plants.

✓ **Improvement in energy intensity**, demonstrating greater energy efficiency relative to the number of employees.

✓ **Consolidation of energy consumption monitoring and control**, strengthening the quality of information for decision-making.



Measurement and Monitoring of Energy Consumption

Measuring and monitoring energy consumption are essential for guiding our decisions and evaluating the progress of eco-efficiency initiatives. At Banco de Occidente, we manage this information centrally through the **Energy Master** platform, where we consolidate the energy consumption of our operational sites based on invoices from various suppliers, ensuring **100% coverage of reported data**.

Based on this information, we strengthen **operational control, track goal achievement, and prioritize energy efficiency projects**, ensuring more precise and timely energy management that is aligned with the Bank's sustainability objectives.

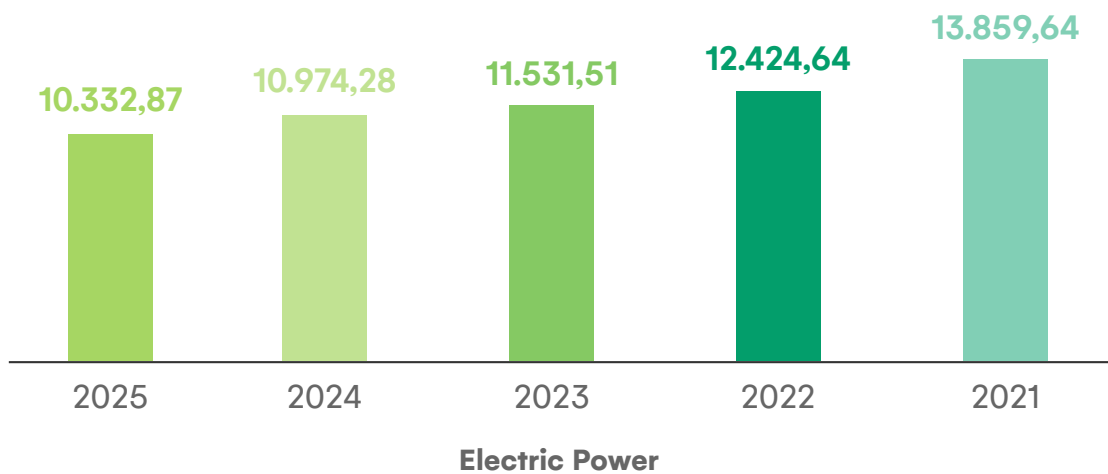
Trend in total electricity consumption

In 2025, **we reached a total consumption of 10.616,90 MWh, representing a 5,84% reduction compared to 2024** and a cumulative decrease of **16,8% from our baseline**. This performance, which exceeded the expected annual target, is the result of the consolidation of our **energy efficiency project** launched in 2023, through which we progressively installed energy-efficient lighting, solar control films, and state-of-the-art air conditioning equipment at our facilities.

We have implemented solutions that improve **seasonal efficiency by up to 28% compared to conventional technologies**. Since a large portion of these installations was completed in the fourth quarter of 2023, **we ensured that the most significant impact was maintained consistently throughout 2025**, reaffirming our path toward long-term sustainability goals.

Reduction of GHG emissions

*Figures in megawatt-hours (MWh).



Energy consumption by source type

As part of our eco-efficiency and energy transition strategy, we manage energy consumption by distinguishing between **renewable and non-renewable sources**, with the goal of moving toward a more efficient energy mix with a lower environmental impact.

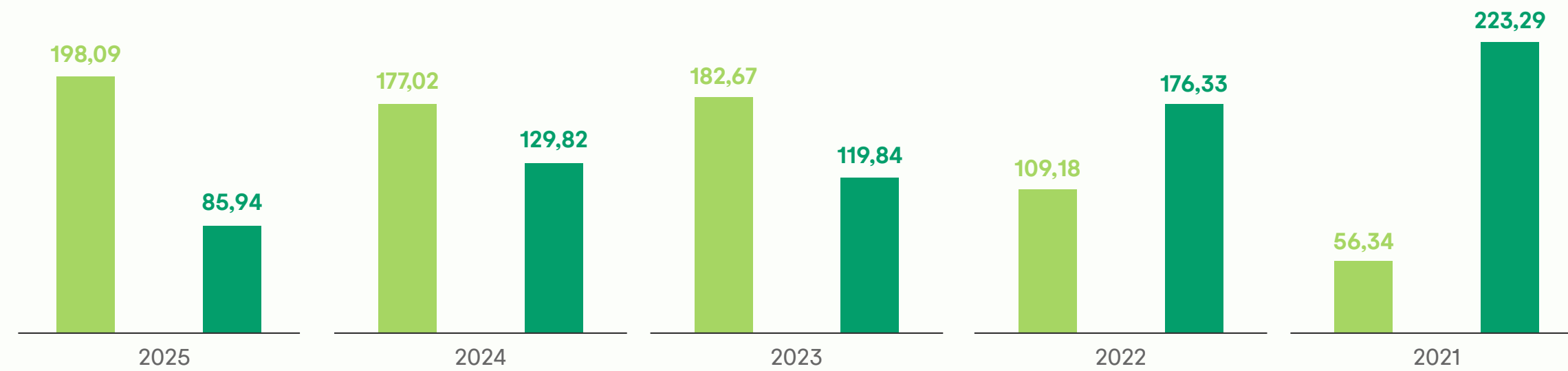
In 2025, energy consumption from **renewable sources reached 198,09 MWh, representing an 11,9% increase compared to 2024 and a cumulative 81% increase relative to the 2022 baseline**. This performance is due to the continuous operation, throughout the twelve months of the year, of the **solar panel systems installed at six of the Bank's offices**, as well as the progressive expansion of solar solutions at our locations. This trend reflects a planned transition toward the use of cleaner energy, which will continue to strengthen in the coming years.

Meanwhile, **non-renewable energy** consumption showed a significant reduction, standing at **85,94 MWh in 2025**, which equates to a **decrease of 33,8% compared to 2024 and 51,26% compared to 2022**. This reduction is primarily due to a structural change in vehicle fleet management through the **leasing scheme** implemented since 2022, which has allowed for the optimization of the use of company-owned vehicles. Additionally, in 2025 there was a **26,55% reduction in fuel consumption compared to 2024**, associated with the strengthening of **preventive maintenance at power plants** located in different regions of the country.



Comparison of renewable and non-renewable energy consumption

■ Energy consumption from renewable sources
■ Energy consumption from non-renewable sources



*Figures in megawatt-hours (MWh).

Summary of energy consumption

Category (MWh)	Fiscal Year 2025 Target	2025	2024	2023	2022	2021
Electricity consumption	10.699,23	10.332,87	10.974,28	11.531,51	12.424,64	13.859,64
Total consumption of non-renewable energy		85,94	129,82	119,84	176,33	223,29
Data coverage		100%	100%	100%	100%	100%

In terms of **electricity consumption**, we went from 12.424,64 MWh in 2022 to 10.332,87 MWh in 2025, representing a cumulative reduction of nearly **17%** over the period. Compared to 2024, the decrease was **5,84%**, a result consistent with the energy efficiency measures implemented at our facilities.

Meanwhile, **non-renewable energy consumption** shows an even more significant reduction, dropping from 223,29 MWh in 2021 to 85,94 MWh in 2025, equivalent to an approximate decrease of **61,5%** over the analyzed period. This trend is primarily associated with the transition in the vehicle fleet and reduced reliance on fossil fuels.

Energy Efficiency and Conservation Projects

As part of our eco-efficiency strategy, since 2023 we have been implementing a comprehensive energy efficiency project aimed at optimizing energy consumption in our offices and main headquarters. This project has included the replacement of lighting fixtures with LED technology, the installation and maintenance of solar control films, and the incorporation of state-of-the-art air conditioning equipment, capable of improving seasonal efficiency by up to 28% compared to conventional solutions.

The impact of these actions was consolidated in 2024 and remained consistent in 2025, contributing to a 5.8% reduction in total energy consumption compared to the previous year and reinforcing compliance with the goals defined in our Eco-Efficiency Plan. These initiatives are complemented by internal campaigns promoting energy conservation and efficient use, which strengthen our organizational culture and encourage responsible practices among our employees.

Total energy consumption (MWh)				
2025	2024	2023	2022	2021
10.616,90	11.281,12	11.834,02	12.710,15	14.139,27





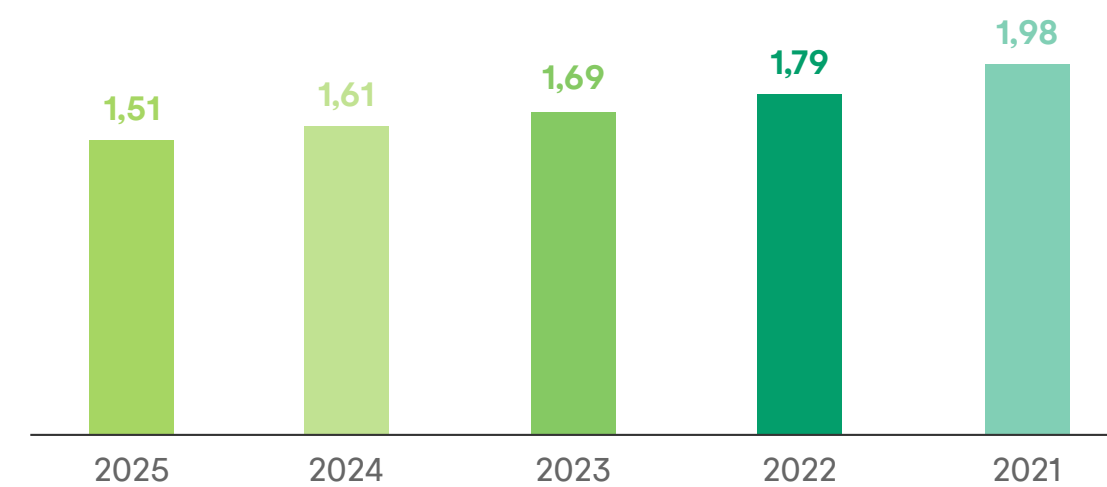
Energy intensity

Energy intensity allows us to analyze **energy consumption in relation to the number of employees**, providing a more accurate view of the Bank's operational efficiency. This indicator reflects how energy optimization measures translate into a more efficient use of resources, regardless of whether operations are growing or stable.

In 2025, energy intensity was **1,51 MWh per employee**, representing a **6,21% reduction compared to 2024** and a cumulative decrease of **15,64% compared to the 2022 baseline**. This result demonstrates the positive impact of the energy efficiency projects implemented and reinforces the Bank's progress toward a more efficient and sustainable operation, in line with its eco-efficiency and energy transition goals.

Energy intensity

*Figures in megawatt-hours per employee (MWh/employee).



Water Resource Management

| GRI 303-5 |

Water is an essential resource for our operations, and therefore, at Banco de Occidente, we manage its use **responsibly and efficiently** as part of our operational eco-efficiency strategy. Our approach prioritizes optimizing consumption, preventing waste, and fostering an organizational culture focused on the conscious use of this resource.

At our facilities, the water supply comes from **local water utilities** in each municipality and city where we operate, and its use is intended exclusively for **domestic purposes**, such as sanitation, hygiene, and food preparation. Similarly, the wastewater generated consists of **domestic sewage**, which is treated and disposed of through municipal sewer systems, in compliance with current environmental regulations.

In line with our **Eco-Efficiency Plan** and the commitments of the **2030 Agenda**, we have set a target to **reduce water consumption by 10%, using 2024 as the baseline**. This approach provides us with a clear and technically sound starting point for tracking performance, guiding our operational decisions, and establishing more efficient and sustainable management practices over time.

Our Management Achievements in 2025

During 2025, we strengthened this management through the following actions:

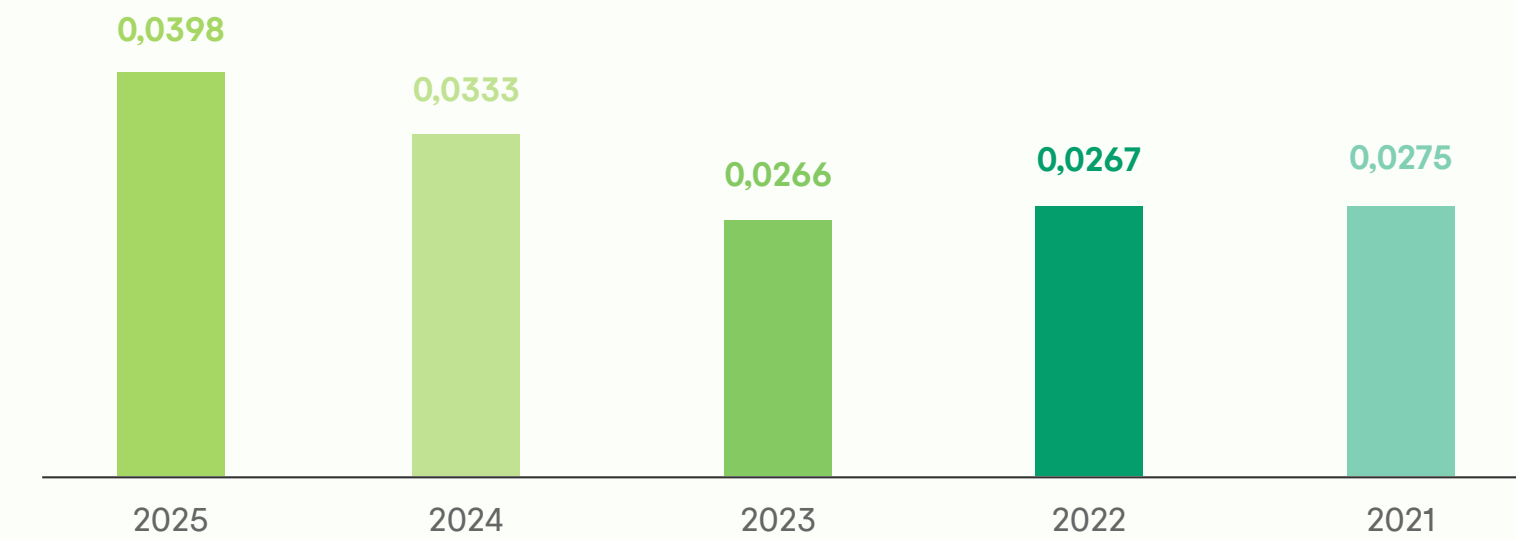
- ✓ **Continuous monitoring of water consumption** at operational sites, with tracking of significant variations.
- ✓ **Reporting and correction of leaks**, based on early warnings identified in Energy Master.
- ✓ **A campaign promoting resource conservation and efficient use**, carried out during the first half of the year, which encouraged responsible practices and recognized the offices with the best performance.
- ✓ **Implementation of water-saving technologies**, such as water-saving faucets and toilets with flow control systems.
- ✓ **Environmental education programs** aimed at strengthening a culture of responsible water use among employees.

While these initiatives contributed to a decrease in consumption at several locations, the overall performance of the indicator in 2025 was influenced by the addition of new measurement points, reinforcing the importance of continuing to advance targeted water efficiency actions in the coming periods.



Water Consumption

Measuring water consumption is a central pillar of our water resource management. To this end, we consolidate data through the **Energy Master** platform, where we record and analyze consumption at our operational sites based on water utility bills, thereby enhancing data traceability and reliability for decision-making.



*Figures in millions of cubic meters (M³).

The trend in water consumption reflects the strengthening of our water resource management and the progressive improvement in the quality of reported information. In 2025, the Bank's total water consumption was **0,0398 M³**, representing a **19,52% increase compared to 2024**.

This increase should be interpreted in the context of adjustments to data coverage and the consolidation of complete information from all operational sites. Specifically, in 2024, consumption at the **Cali Main Building — Tower 1** was recorded for only six months, whereas in 2025, data for the full twelve months of the year was included, resulting in an upward variation compared to the previous period.

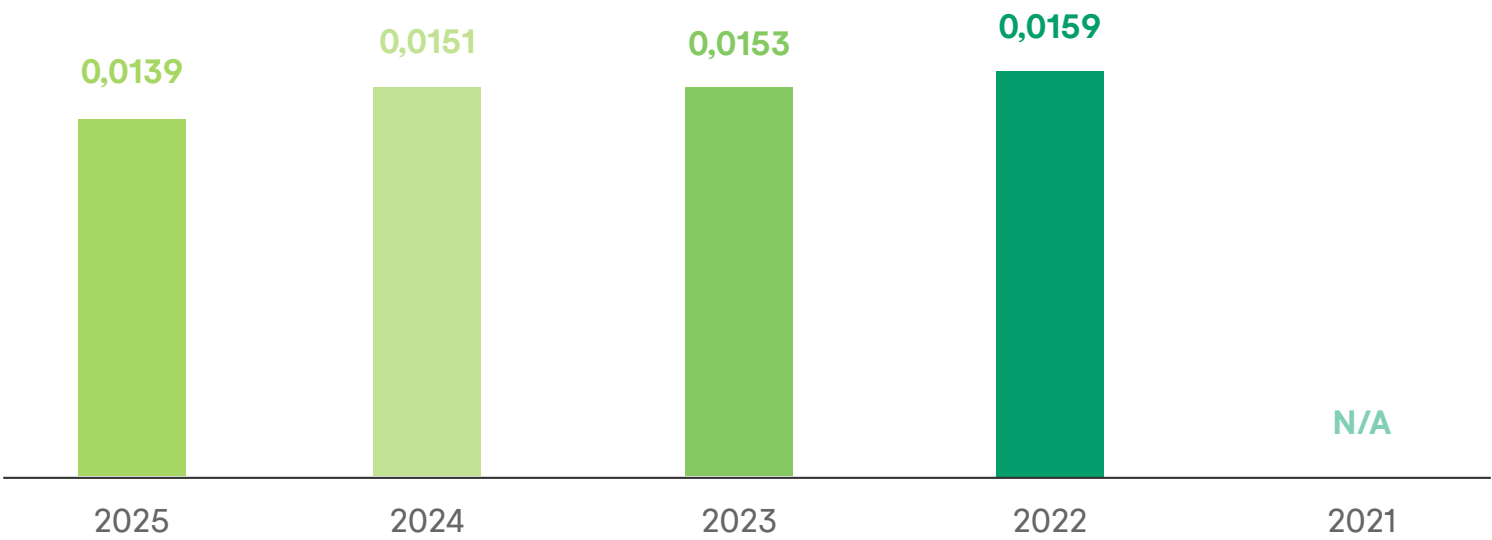
In this regard, the trend observed in the graph does not reflect a structural increase in water use, but rather a **more accurate and representative measurement of actual consumption**, strengthening the information base for implementing water optimization and efficient use measures in future periods.



Water Consumption in Water-Stressed Areas

As part of our responsible management of water resources, we conduct specific monitoring of **water consumption in areas identified as water-stressed**, based on information provided by environmental authorities. This approach allows us to better understand the potential risks associated with water use and to direct optimization efforts in regions with greater water sensitivity.

In 2025, water consumption in these areas was **0,0139 M³**, representing an **8,43% decrease compared to 2024**. This reduction demonstrates the positive impact of measures for efficient water use and continuous monitoring of consumption at facilities located in these regions.



*Figures in millions of cubic meters (M³).

The areas considered in this analysis include, among others, the cities of **Aguachica, Barrancabermeja, Barranquilla, Bogotá, Bucaramanga, Chía, Girardot, Girón, Guatapé, Medellín, Montería, Mosquera, Piedecuesta, Riohacha, San Gil, Siberia, Valledupar, and Zipaquirá**, whose consumption is monitored through the **Energy Master** platform.

It is important to note that, as of 2025, some consumption figures are still being consolidated due to bimonthly billing schedules. However, the observed trend confirms a management approach focused on **reducing consumption in contexts of increased water stress**, thereby strengthening the Bank’s operational resilience.

Water Consumption Management in Operations (2021—2025)

Category (Millions of m ³)	Fiscal Year 2025 Target	2025	2024	2023	2022	2021
Water Abstraction (excluding saltwater)		0	0	0	0	0
Water discharge (excluding salt water)		0	0	0	0	0
Total net freshwater consumption (AB)	0,0328	0,0398	0,0333	0,0266	0,0267	0,0275
Data coverage		100%	100%	100%	100%	100%

During the 2021—2025 period, no **direct water extraction or discharge** activities were recorded, indicating that our operation does not place additional pressure on natural water sources.

Total net freshwater consumption remained stable between 2021 and 2023 (0,0275—0,0266 million m³), with an increase in 2024 (0,0333) and 2025 (0,0398), associated with higher occupancy at facilities and the normalization of in-person activities.

By 2025, consumption exceeded the established annual target (0,0328 million m³), reinforcing the need to continue strengthening our water efficiency strategies and internal awareness initiatives. **100% data coverage** across all years ensures the traceability and reliability of the reported information.

Goals, Challenges, and Opportunities

For 2025, we set a target of a **1,5% reduction in water consumption**. Although the indicator showed an **increase of 19,52%**, this result is primarily due to improved coverage and quality of information, stemming from the inclusion of new consumption points, and not to a structural increase in resource use. This advancement in measurement constitutes, in turn, a significant milestone for future management.

Since this data lacks traceability from previous years, we have established 2024 as a new baseline without this affecting our 10% reduction target, aligned with our Eco-Efficiency Plan and the 2030 Agenda, which equates to an annual decrease of 1,5%.



Waste Management

| GRI 306-3; 306-4; 306-5 |

Waste management is a key pillar of our **operational eco-efficiency** and our commitment to more sustainable operations. At Banco de Occidente, we focus this management on **reducing waste generation, utilizing waste, and ensuring proper final disposal**, in line with the principles of the **circular economy**, the 2030 Agenda, and our **Comprehensive Waste Management Plan (PGIR)**.

Our approach prioritizes **prevention at the source**, proper separation, and the strengthening of reuse and recycling practices, ensuring that waste that cannot be reused is managed safely through **authorized environmental service providers**, in compliance with current regulations.

In line with this commitment, we have set a goal to **reduce waste generation by 20% by 2030**, equivalent to an annual reduction of **2,5%**, thereby consolidating responsible management focused on continuous improvement.

Comprehensive Waste Management Model

Waste management at Banco de Occidente is structured around our Comprehensive Waste Management **Plan (PGIR)**, which guides actions to **prevent, minimize, recover, and properly dispose** of the waste generated in our operations. This model is implemented at all locations, ensuring consistent management aligned with current environmental regulations.

The PGIR is based on four main pillars:

- **Prevention and minimization**, through the reduction of waste at the source.
- **Internal waste management**, through proper segregation and safe temporary storage.
- **External waste management**, through delivery to **authorized environmental** service providers for recycling or final disposal.
- **Monitoring and evaluation**, which allows us to verify compliance with actions and continuously improve management.

This management is complemented by **awareness campaigns and environmental education programs** aimed at employees, strengthening a culture of source separation and responsible use of resources—key to meeting our eco-efficiency goals.

Goals, Challenges, and Opportunities

By 2025, we achieved a **25,94% reduction in waste generated compared to 2024**, regaining the optimization trend following the one-time increase associated with remodeling projects. This result reflects the strengthening of control, recovery, and reduction efforts at the source.

Moving forward, the main **challenges** center on managing waste resulting from infrastructure upgrades and implementing site-specific monitoring, while **opportunities** lie in increasing the reuse of recyclable materials, further digitizing processes, and consolidating a culture of source separation that enables continued reduction in waste generation.

Measurement, Scope, and Quality of Information

Information on waste generated and managed is compiled from the operational records of the Bank's offices and reports issued by **authorized environmental managers**, ensuring traceability, reliability, and compliance with current environmental regulations. The coverage of the reported data is **100%** for the period analyzed.

Tracking is conducted by distinguishing **between waste types** (hazardous and non-hazardous) and their **final disposition** (recovery or disposal), which allows for the evaluation of management performance and the identification of areas for improvement. The variations observed in the indicators, particularly the increase recorded in 2024, are mainly due to **building and office renovation activities**, which generated higher volumes of construction and demolition waste. In 2025, the normalization of these activities and the strengthening of control measures allowed for a return to the path of reduction and optimization in waste management.





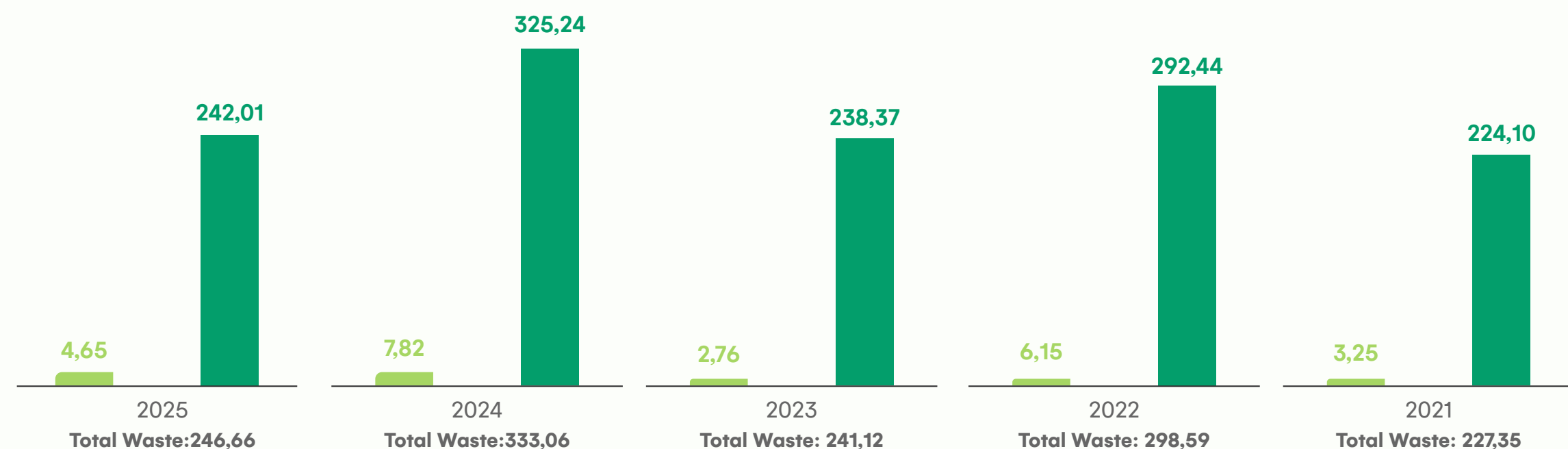
Waste Generation

The trend in waste generated reflects the impact of the Bank's operational activities and specific events, such as building and office remodeling projects. In 2025, total waste generated was **246,66 tons**, representing a **25,94% reduction compared to 2024**, a year in which a significant increase was recorded, primarily associated with facility adaptation and renovation projects.

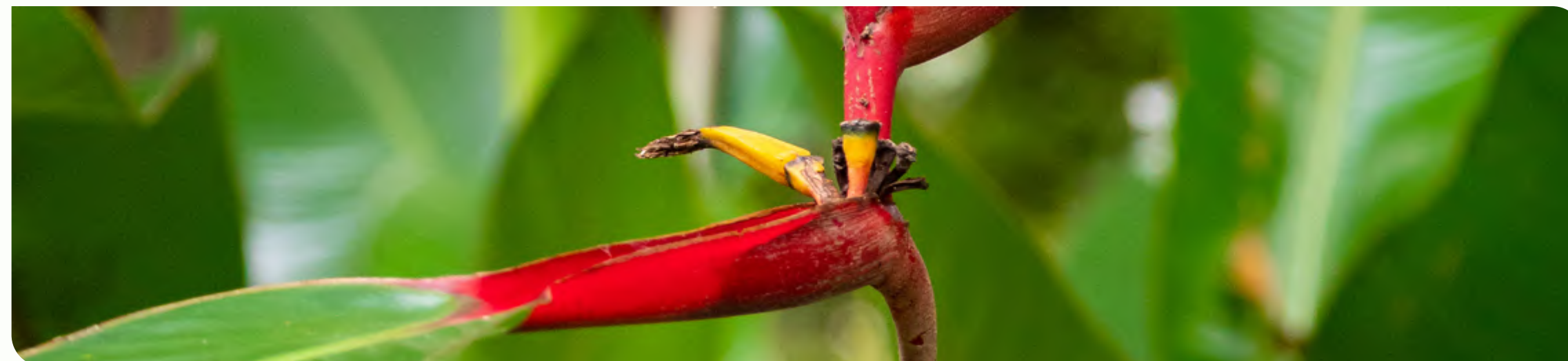
During 2025, **98,11% of the waste generated was properly treated and recycled**, maintaining a performance consistent with the past four years and demonstrating the effectiveness of our management. Given the nature of our operations, approximately **80% of the waste generated is non-hazardous**, most of which is recycled or reused.

Overall, the 2025 results confirm a return to the path of waste reduction and progress toward meeting the goals established in our Eco-Efficiency Plan.

■ Waste destined for disposal
■ Waste not destined for disposal



*Figures in tons (ton).

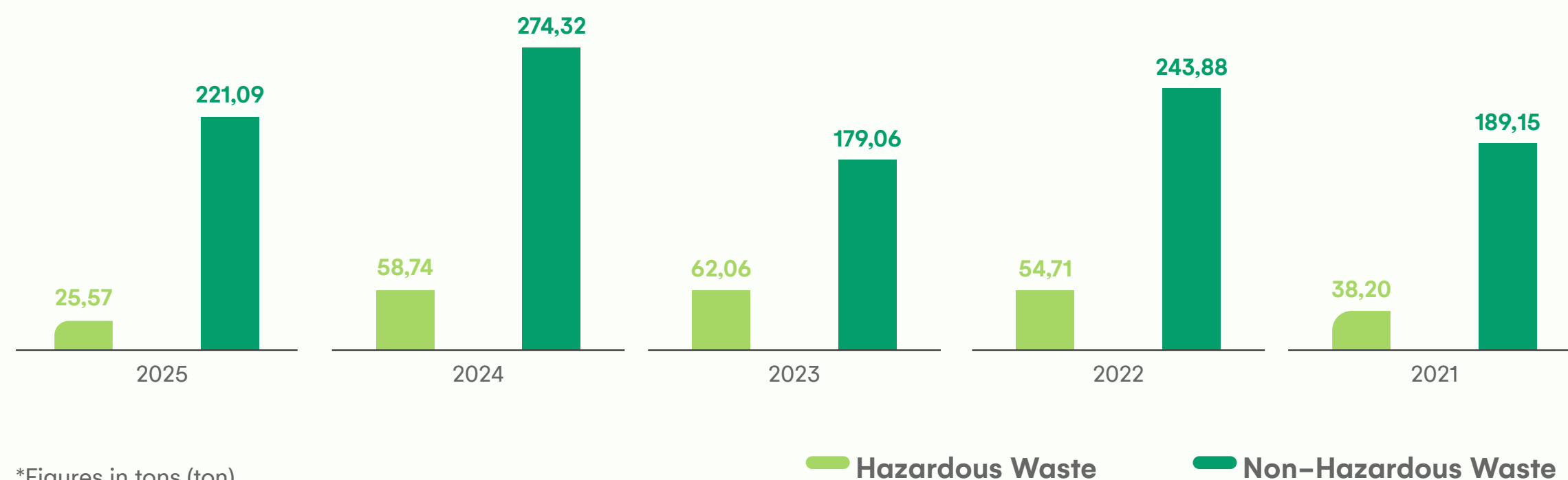


Waste Not Sent to Landfill (Recovery)

Waste recovery is a central pillar of our management and a reflection of the **circular economy** approach we promote in our operations. In 2025, **more than 95% of the waste generated was recovered**, maintaining a performance consistent with recent years and demonstrating the effectiveness of the actions implemented.

Non-hazardous waste accounts for the largest proportion of recovery. In 2025, **220,94 tons** of recovered non-hazardous waste were managed, primarily **paper, cardboard, wood, metal, and plastic**—materials largely associated with building and office renovation processes—which were reintroduced into recycling chains through authorized environmental management companies.

Regarding **recycled hazardous waste**, **21,06 tons** were managed in 2025, with a notable reduction compared to 2024, particularly in **Waste Electrical and Electronic Equipment (WEEE)**, as a result of the completion of technology renewal projects. Other waste, such as lamps and toner, continued to be managed under specialized recycling programs.

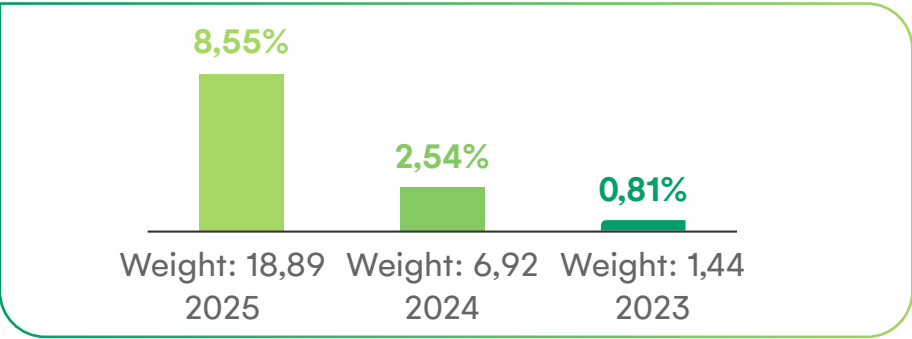


*Figures in tons (ton).

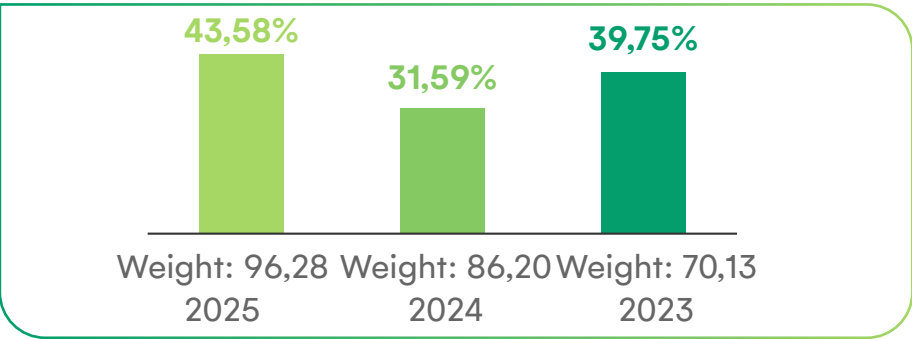


Waste not destined for disposal

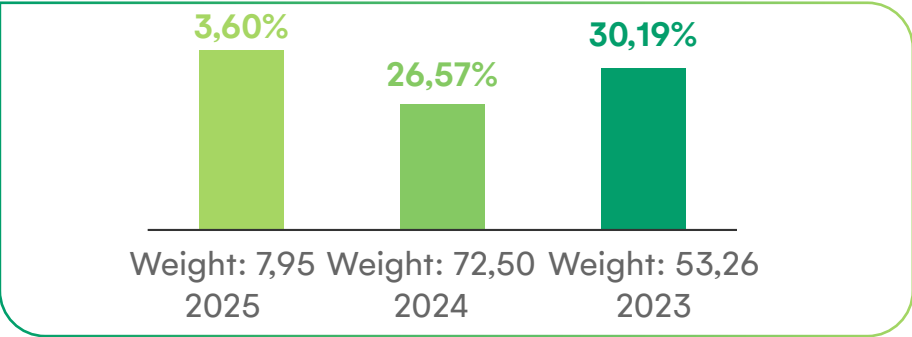
Plastic, acrylic, PVC,
plastic cards —
Recycling



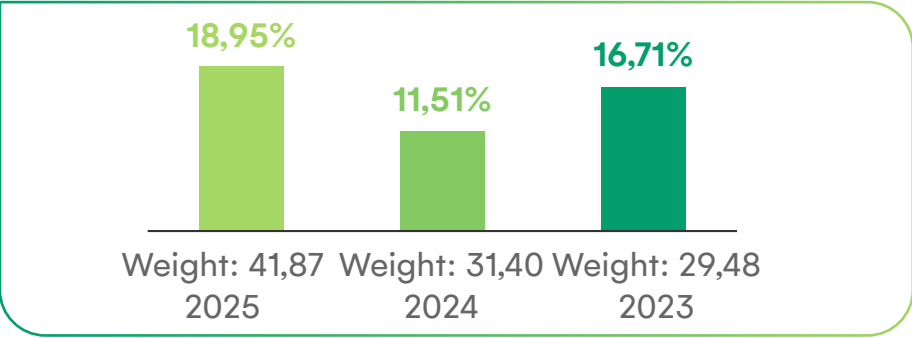
Archive paper —
Recycling



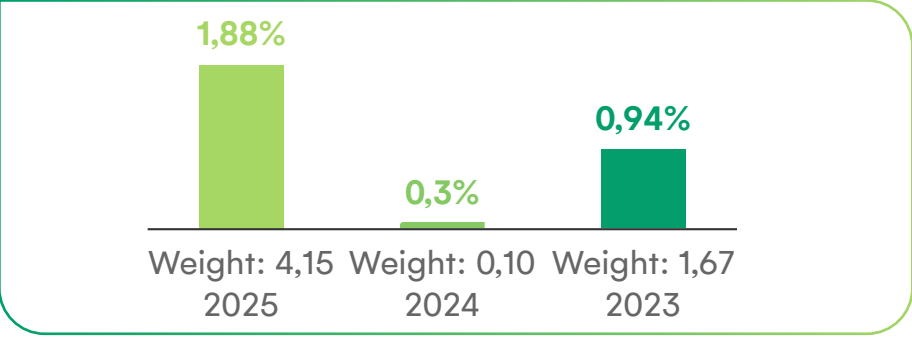
Metals —
Recycling



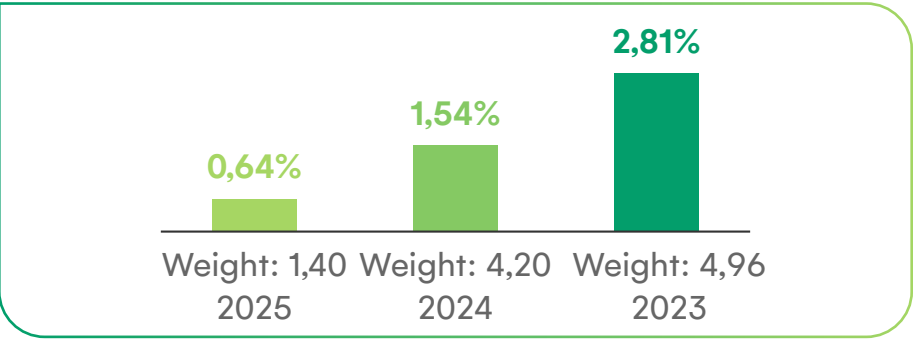
Wooden furniture —
Recycling



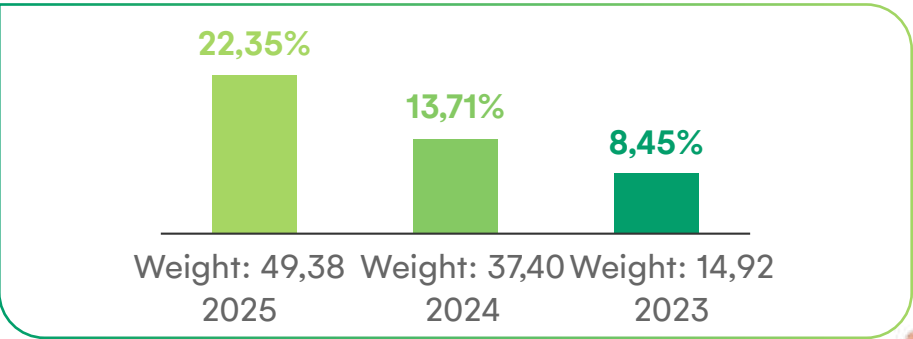
Textiles —
Recycling



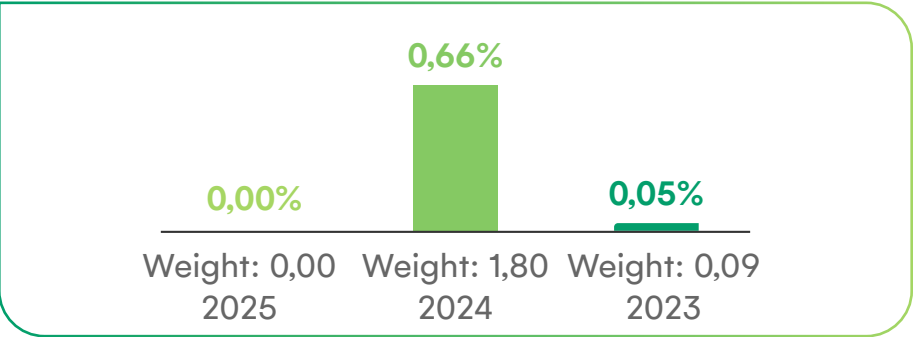
Glass —
Recycling



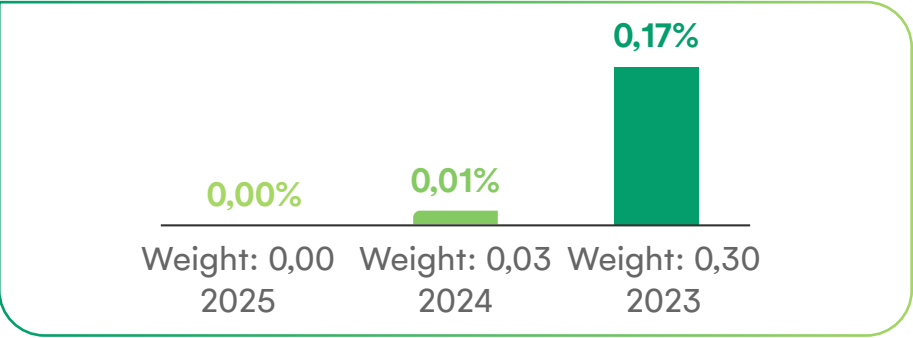
Cardboard —
Recycling



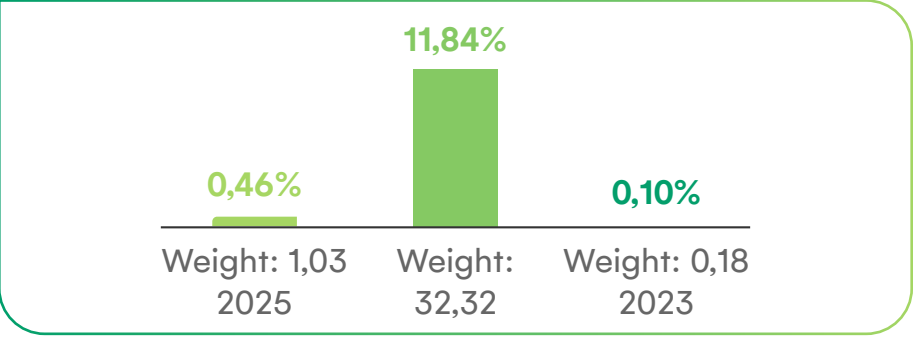
Marble —
Recovery



Rubber and tire
waste — Recovery

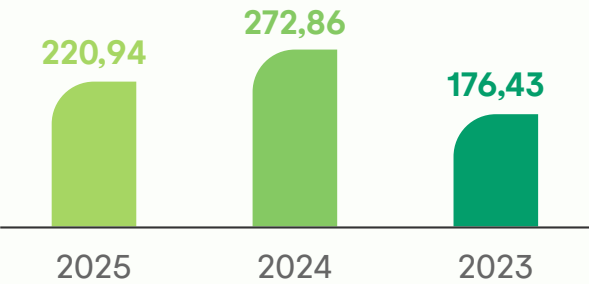


Others: UTP cable,
general and special
waste — Recovery



*Figures in all charts are in tons (ton).

Total recoverable non-hazardous waste





Recycled hazardous waste

Type of waste	Recovery method	2025	2024	2023	2022
Used oils	N/A	Weight: 0 0,0%	Weight: 0 0,0%	Weight: 0 0,0%	Weight: 0,23 0,46%
Light bulb waste	Recycling	Weight: 3,21 5,18%	Weight: 0,16 0,26%	Weight: 0,21 0,33%	Weight: 0 0,0%
Tonner Lexmark	Recycling	Weight: 0,37 0,60%	Weight: 0,41 0,66%	Weight: 0,54 0,87%	Weight: 0 0,0%
WEEE	Recycling	Weight: 17,48 33,38%	Weight: 51,80 98,91%	Weight: 61,19 98,80%	Weight: 49,12 99,54%
Total hazardous waste recycled (tons)		21,06	52,37	61,94	49,35

*Figures in tons (t).

Waste sent for disposal

Waste destined for disposal represents a **smaller proportion of total waste generated**, reflecting the Bank’s focus on reuse and reduction at the source. In 2025, there was a **significant decrease in waste sent to final disposal**, particularly that destined for landfills and containment cells.

During the year, **0,15 tons of non-hazardous waste were disposed** of, reflecting a sustained reduction compared to previous years. Regarding **hazardous waste destined for disposal**, **4,51 tons** were managed, representing a **29,29% reduction compared to 2024**, primarily due to the completion of remodeling activities and improved control over the generation of this type of waste.

It is important to note that in 2025, **no waste was incinerated, nor was there** any waste with unknown disposal methods, and that all waste destined for disposal was managed through **authorized environmental service providers**, in compliance with current environmental regulations.



Non-hazardous waste disposed of

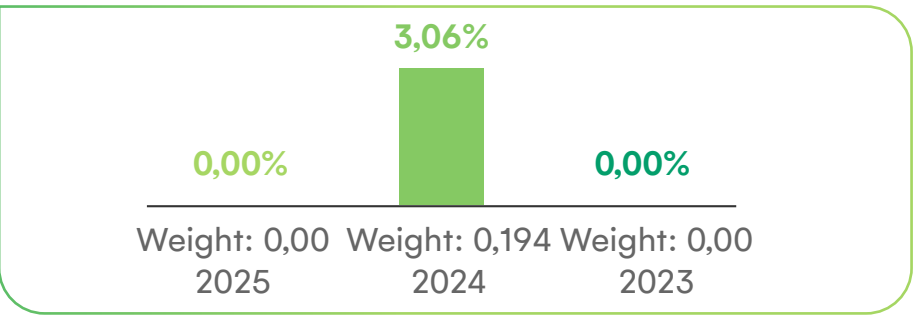
Type of waste	Disposal method	2025	2024	2023
Ordinary/common waste	Landfill	Weight: 0,15 100%	Weight: 1,46 100%	Weight: 2,63 100%
Non-recoverable organic and inorganic waste, production facility waste, rubber and tire waste, sludge, dust, and process samples, others.	N/A	Weight: 0 0,0%	Weight: 0 0,0%	Weight: 0 0,0%
Total hazardous waste recycled (tons)		0,15	1,46	2,63

*Figures in tons (ton).

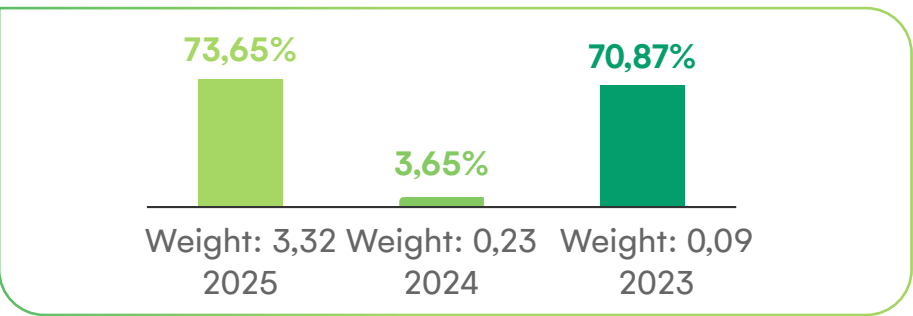


Hazardous waste not recycled

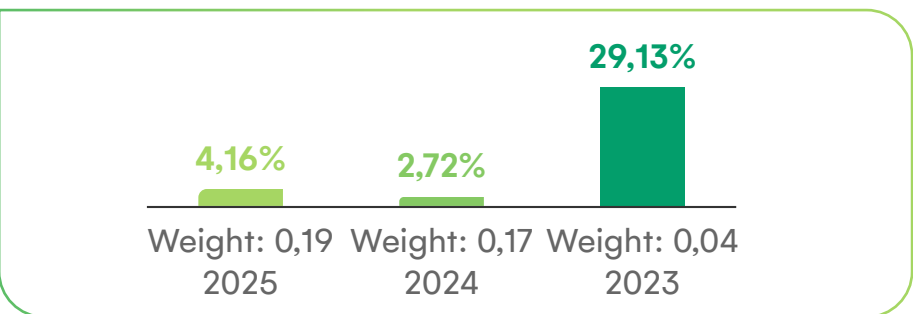
Liquids and Hydrocarbon-Contaminated Equipment — Final disposal in a safety cell



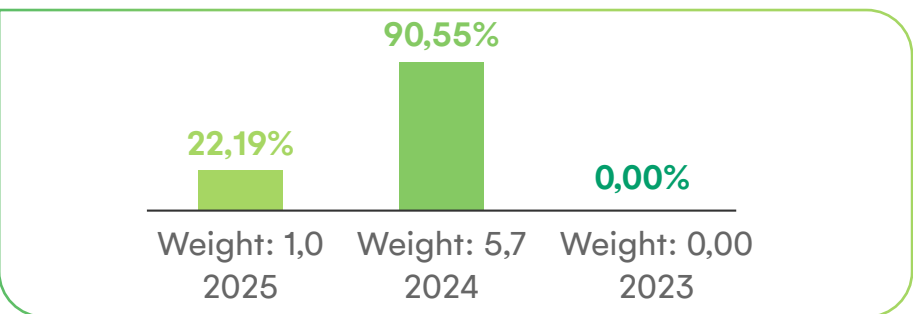
Battery waste — Final disposal in a safety cell



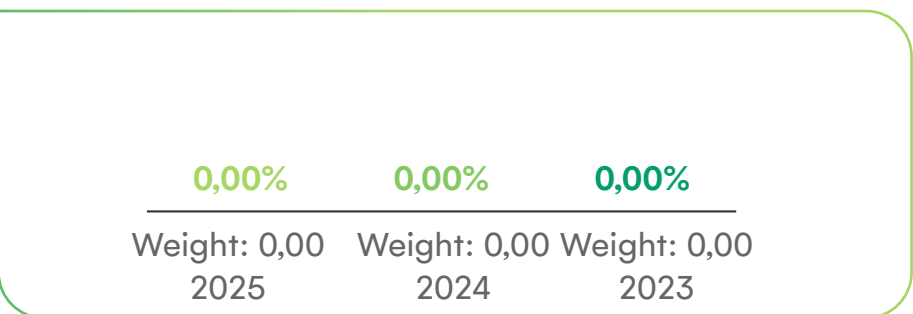
Toner and printing inks — Final disposal in a secure cell



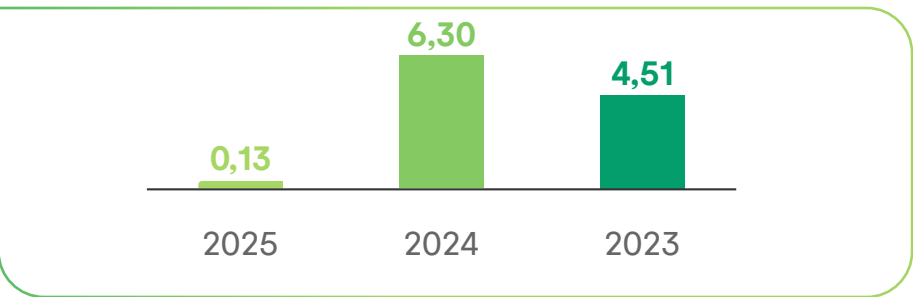
Construction and demolition waste (CDW) — Landfill



Used oils — Lime, dissolved acidic laboratory waste, medications, fiberglass, lamp waste.



Total Hazardous Waste Disposed



Waste Generated, Recycled, and Disposed

This table shows the evolution of our comprehensive waste management, distinguishing between recycled waste and waste destined for disposal, with 100% coverage of the reported information. Our reduction target is aligned with the Eco-efficiency Plan and the 2030 Agenda, with a goal of a **progressive 20% reduction by 2030 (equivalent to 2,5% annually)**.

Unit (metric tons)	Target Fiscal Year 2025	2025	2024	2023	2022	2021
Total waste recycled/reused		242,01	325,24	238,37	292,44	224,10
Total Waste Disposed	317.109	4,65	7,82	2,76	6,15	3,25
Total Landfilled Waste		4,65	7,82	2,76	6,15	3,25
Incinerated Waste with Energy Recovery			0	0	0	0
Incinerated Waste without Energy Recovery			0	0	0	0
Waste with unknown disposal method			0	0	0	0
Data coverage		100%	100%	100%	100%	100%

*Figures in all charts are in tons (ton).





Following the increase recorded in 2024 (333,06 tons), primarily associated with office and building renovation projects, in **2025** we managed to stabilize the indicator, reaching a total of **246,66 tons**. This represents a **25,94% reduction compared to the previous year**, demonstrating the effectiveness of the actions implemented to strengthen control, prevention, and responsible waste management.

During this period, **we increased the amount of recyclable waste**—particularly paper, metal, wood, and cardboard—generated by remodeling activities, ensuring its proper sorting and recycling. At the same time, we strengthened structural measures for source reduction, such as digitizing documents to reduce paper consumption and promoting remote work, contributing to lower operational waste generation.

Regarding **hazardous waste**, in 2025 we recorded **4,65 tons**, representing a **40,54% reduction compared to 2024**. This result reflects more efficient management within the framework of interventions carried out at our facilities and rigorous control of final disposal, always prioritizing regulatory compliance and the minimization of environmental impact.

Reduction and Circular Economy Initiatives

As part of our strategy to reduce waste generation and strengthen the **circular economy**, in 2025 we continued to implement actions focused on **prevention at the source, material reuse**, and changing habits in our operations.

Key initiatives include:

- ✓ **Strengthening the reuse of waste**, particularly paper, cardboard, wood, and metal, associated with office and building renovation processes.
- ✓ **Digitizing documents and processes**, contributing to the reduction of paper consumption and waste associated with printing and logistics.

- ✓ **Promoting remote work** as a complementary measure to reduce waste generation at administrative offices.
- ✓ **Source separation campaigns**, accompanied by clear signage and guidelines in offices.
- ✓ **Environmental awareness and education programs** for employees, focused on best practices in waste management.

Paper Consumption

Managing paper consumption is a key component of our **operational eco-efficiency** strategy, as it allows us to reduce environmental impacts associated with printing, logistics, and resource use, while strengthening the digitization of our processes and our customers' experience.

At Banco de Occidente, we address this challenge from a comprehensive perspective, prioritizing **digital transformation, the responsible use of supplies, and the optimization of information flows**. This approach has allowed us to make steady progress in reducing paper consumption, aligning our operations with long-term environmental goals and an increasingly efficient operating model.





Leverages for Reducing Paper Consumption

To advance the progressive reduction of paper consumption, in 2025 we strengthened a set of structural measures aimed at preventing the unnecessary use of this resource and promoting digital alternatives:

- **Digitization of the office supply ordering process** using the Ofix platform, facilitating the monitoring and tracking of office supply usage.
- **Review and control of stationery requests** to avoid unnecessary volumes of supplies and promote more efficient use.
- **Implementation of certified text messaging** for products such as vehicles, payroll, and rotating inventory, reducing the need for printed communications.
- **Continuation of the migration from physical statements** to digital statements, consolidating electronic channels as the primary means of communication with customers.
- **Exclusive use of eco-friendly paper** for office stationery supplies, as a measure to mitigate the environmental impact associated with residual paper consumption.

Key Results 2025

During the year, **total paper consumption reached 30,82 tons**, reflecting the following results:

- **A 12,10% reduction** compared to 2024.
- **A cumulative reduction of 44,7%** compared to the 2022 baseline.
- Consistent progress toward the goal of **reducing paper consumption by 25% by 2030**, as established in our Eco-Efficiency Plan.

These results are primarily due to the increased **digitization of processes**, more efficient control of office paper supplies, and the adoption of internal practices focused on the responsible use of this resource, consolidating an increasingly efficient operation with a smaller environmental footprint.

Breakdown of Paper Consumption

In 2025, the Bank's total paper consumption amounted to **30,82 tons**, with the majority consisting of **eco-friendly paper**, in line with our **policy of standardizing supplies and reducing environmental impact**.

The breakdown of consumption by paper type was as follows:

- **Eco-friendly letter-size paper:** 27,0 tons (88,49% of total consumption).
- **General eco-friendly paper:** 3,51 tons (11,5% of total consumption).
- **Eco-friendly legal-size paper:** 0,0004 tons (0,00131% of total consumption).
- **Custom white paper:** 0,00014 tons (0,00046% of total consumption).

This breakdown shows that the use of non-eco-friendly paper is marginal and meets specific needs, while operations rely primarily on supplies with a lower environmental impact.

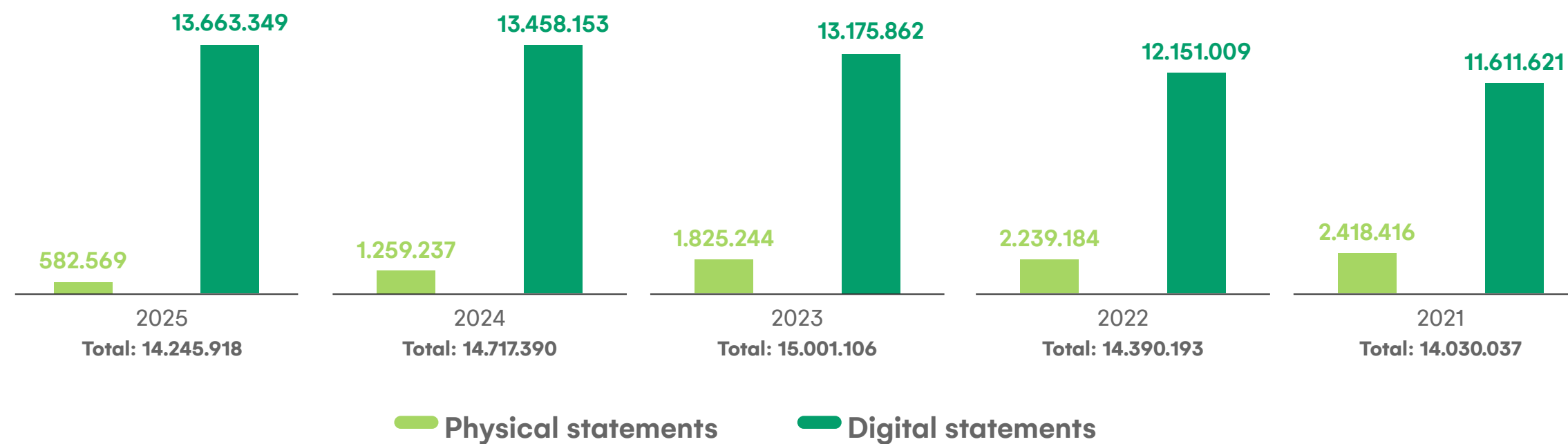
Digitization of statements

This initiative established itself in 2025 as one of the main drivers of the Bank's reduction in paper consumption. This progress reflects not only more efficient resource management but also an improvement in customer experience, by prioritizing more agile and sustainable digital channels.

As part of our sustainability strategy, the gradual shift of statements to digital formats significantly reduced the impacts associated with printing, the use of supplies, and distribution logistics. During 2025, this trend strengthened compared to previous years, cementing a structural change in how we communicate with our customers.



- **95,9% of the statements delivered** were digital, compared to **91,4% in 2024**.
- **Physical statements decreased by 53,7%** compared to 2024, falling from **1.259.237** to **582.569** units.
- **Digital statements increased by 1,5%**, reaching **13.663.349** units in 2025.

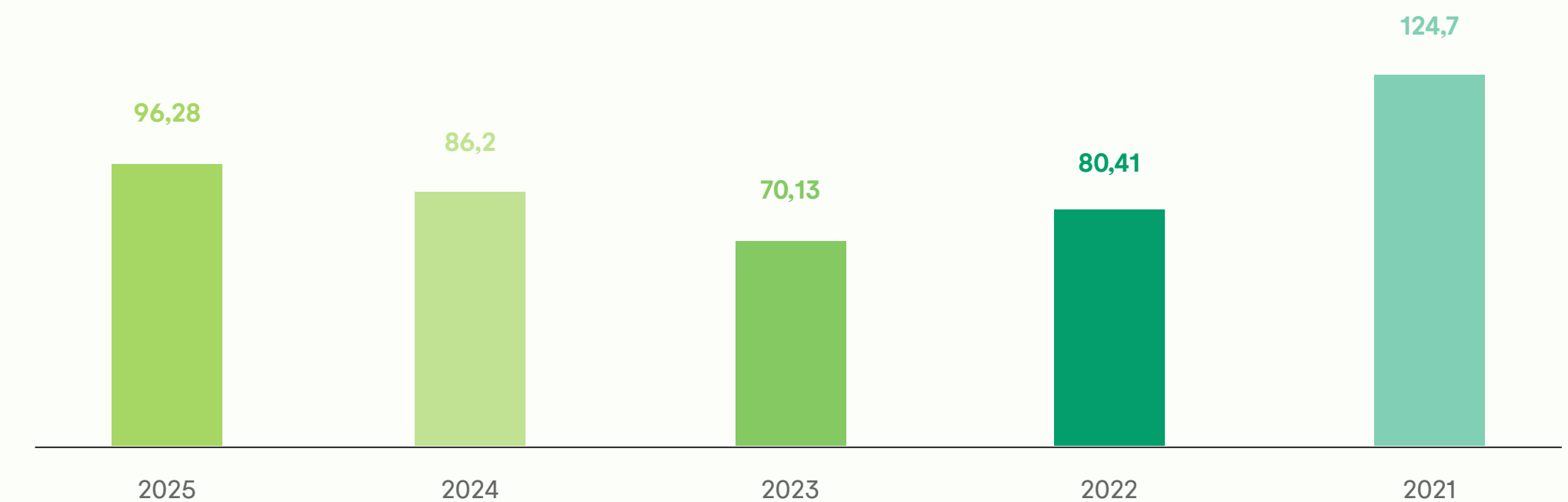


Paper Management for Recycling

Responsible paper management focuses not only on reducing consumption but also on the proper use of the material used. In this regard, we maintain the **best practice of delivering the paper generated in our operations to an authorized environmental management company**, promoting its recycling and reintroduction into the production chain.

Although total paper consumption continued to decline in 2025, the **amount of paper delivered for recycling increased** compared to the previous year. This trend is primarily explained by **building and office design, adaptation, and remodeling projects**, which generated higher volumes of paper for disposal and reuse, without being associated with regular operational consumption.

The following chart shows the **trend in paper sent for recycling** in recent years, illustrating the management and reuse of this material within a circular economy framework:



*Figures in tons (ton) of paper.

We maintain the **best practice of delivering the paper generated in our operations to an authorized environmental management company**, promoting its recycling and reintroduction into the production chain.



Projections and Next Steps

Looking ahead to 2026, we will continue to strengthen paper consumption management through actions aimed at consolidating the digitization of processes and progressively reducing printing in our operations.

Key initiatives include:

- **Migrating the Bank's custom forms from white paper to eco-friendly paper**, with the aim of reducing the environmental impact associated with the materials used.
- **Strengthening efforts to reduce the printing of statements** by actively promoting the use of digital channels.
- **Exploring new digital communication strategies**, such as the use of **SMS messaging, electronic communications, and electronic document signatures**, to optimize processes and improve the customer experience.

Protection of biodiversity and ecosystems



SDG 6.4; 13.2; 15.1
| GRI 101-1; 101-3; 101-4 |

At Banco de Occidente, we understand that protecting biodiversity is an essential component for the sustainability of the regions where we operate and for the well-being of present and future generations. Therefore, we have integrated this commitment across all aspects of our management, recognizing the close relationship between ecosystem conservation, climate action, and sustainable development.

Policies to Halt and Reverse Biodiversity Loss

At Banco de Occidente, we have an **Environmental and Climate Change Policy** that establishes our commitment to environmental conservation and the responsible management of environmental impacts resulting from our operations. This policy recognizes the vulnerability of ecosystems to climate change and the importance of protecting biodiversity as the



foundation for the well-being of present and future generations.

Our commitment is grounded in alignment with international frameworks and agreements such as the **Kunming-Montreal Global Biodiversity Framework**, the Paris Agreement, the Sustainable Development Goals (SDGs), and the Colombia Carbon Neutral Strategy. Through our strategic focus on **Environmental Stewardship**, we integrate climate mitigation and adaptation actions, the efficient use of natural resources, and a positive relationship with the environment, progressively contributing to the protection and restoration of ecosystems.

The policy applies to **Banco de Occidente, its subsidiaries, and its business relationships**, promoting awareness and shared responsibility among employees, suppliers, customers, and partners regarding sustainability and the protection of biodiversity.

Access to and Sharing of Benefits

At Banco de Occidente, we understand that biodiversity protection goes beyond ecosystem conservation and must generate **shared benefits** for the communities and territories where initiatives are carried out. Therefore, we have prioritized an **ecological restoration** approach **using native species**, which simultaneously contributes to environmental recovery, climate resilience, and the strengthening of the social fabric.

As part of this commitment, in 2022 we established a **strategic partnership with the World Wildlife Fund (WWF Colombia)**, aimed at conserving strategic ecosystems within the **National System of Protected Areas (SINAP)**. This partnership, which is voluntary and goes beyond our legal obligations, was initially conceived **to last three years and remained active**



through 2025, consolidating ecological restoration processes in coordination with local communities that have decided to transform their production practices and contribute to the protection of the natural environment.

Since the partnership began, we have contributed to the **planting of more than 30.000 seedlings nationwide**, strengthening a community-based restoration model that promotes biodiversity conservation, the creation of local opportunities, and social ownership of the land. Looking ahead, we are working to **renew this partnership for a new three-year term**, with the aim of expanding its scope and impact on the protection of the country's strategic ecosystems.

Identifying Impacts on Biodiversity

At Banco de Occidente, we identify our actual and potential impacts on biodiversity by analyzing our strategic partnerships, environmental investments, and restoration projects, prioritizing territories with high ecological value and relevance for ecosystem conservation.

This approach has allowed us to concentrate our efforts in areas where our actions generate positive and measurable impacts, both in the recovery of degraded ecosystems and in strengthening climate resilience and biodiversity conservation. Through our partnership with WWF Colombia, we have focused our interventions within the SINAP, ensuring that restoration actions are carried out in strategic ecosystems and in accordance with technical and scientific criteria.

During the third year of this initiative's implementation, we have supported ecological restoration processes in four key regions, contributing to ecosystem recovery and the strengthening of local communities:

→ **Farallones de Cali National Natural Park:** 9.406 seedlings — 13 ha.

✓ Ecological restoration: 7.750 seedlings (11,8 ha)

✓ Volunteer work: 1.656 seedlings (1,2 ha)

→ **DRMI La Playona and Loma La Caleta (Acandí, Chocó):** 8.000 seedlings.

✓ (Process carried out exclusively through ecological restoration).

→ **High Andean Forest — Chingaza National Park buffer zone:** 8.418 seedlings — 8,5 ha.

✓ Ecological restoration: 7.500 seedlings (7,5 ha).

✓ Volunteer work: 918 seedlings (1 ha).

→ **Isla de Salamanca National Park (VIPIS):** 9.190 seedlings — 8,5 ha.

✓ Ecological restoration: 8.200 seedlings (7,5 ha).

✓ Volunteer efforts: 990 seedlings (1 ha).

Prioritized protected areas: 35.014 seedlings — 38 hectares restored

Of this total, 31.450 seedlings correspond to formal technical ecological restoration processes, carried out through voluntary agreements with landowners, local communities, and environmental authorities, based on scientific criteria and with specialized support.

Additionally, through volunteer workdays, the following reserves have been restored:

→ **Bogotá Eastern Forest Protected Forest Reserve (Las Moyas Trail):** 560 seedlings.

→ **Nare River Forest Reserve (Arví Park):** 282 seedlings plus replanting efforts.

The volunteer days, meanwhile, have complemented the program's environmental impact, strengthening social ownership of the territories and our collaborators' commitment to conservation.

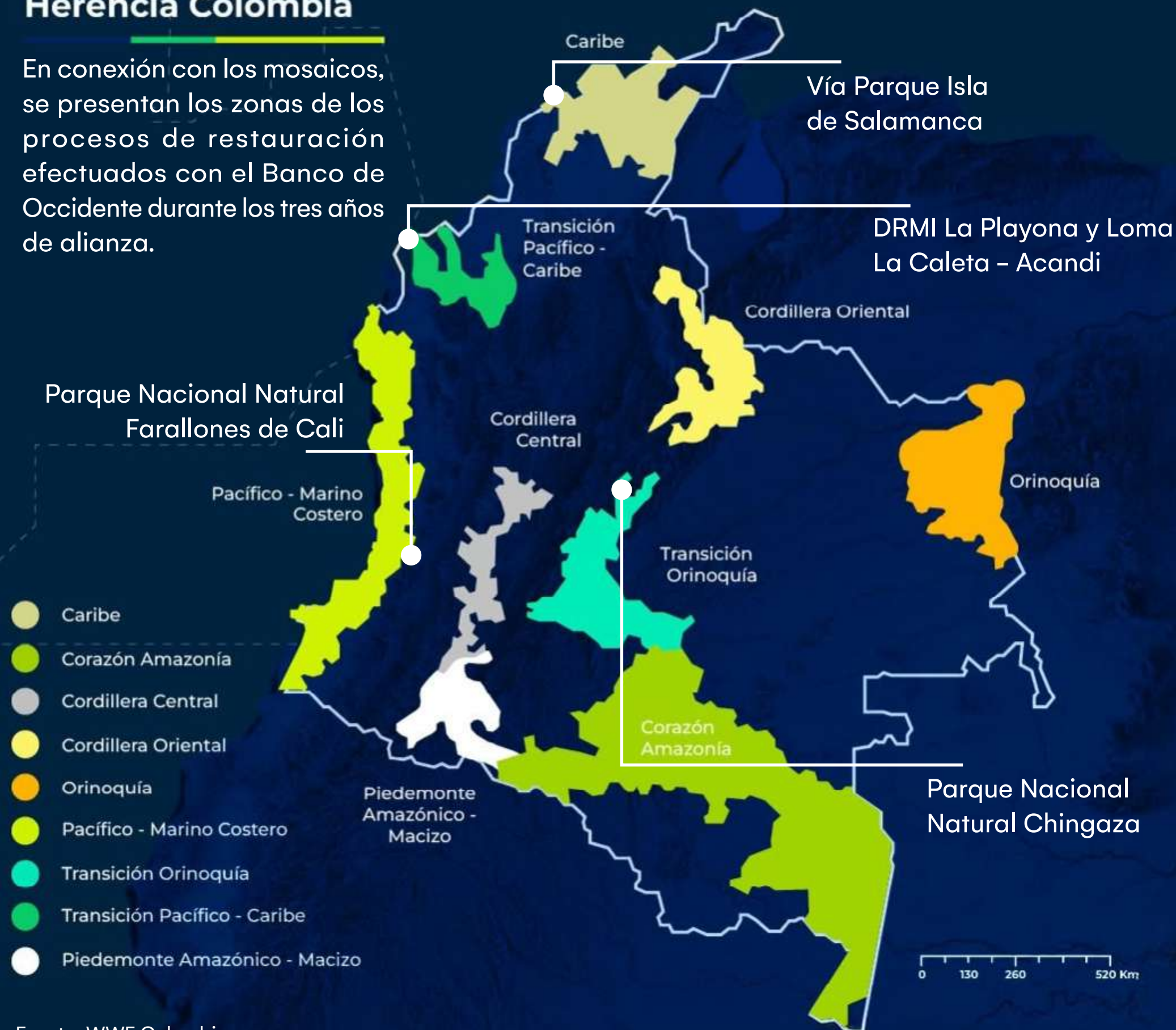
Through this structured intervention, we contribute not only to the recovery of natural cover and the protection of ecosystem services—such as water regulation and carbon sequestration—but also to the strengthening of local capacities and the consolidation of participatory conservation models in strategic areas of the country.

Below, we present the **intervention areas** where we have focused our restoration and conservation efforts, as well as the main results achieved in each of them.



Mosaicos de Conservación definidos para Herencia Colombia

En conexión con los mosaicos, se presentan las zonas de los procesos de restauración efectuados con el Banco de Occidente durante los tres años de alianza.



Fuente: WWF Colombia

Farallones de Cali National Natural Park

The **Farallones de Cali National Natural Park** is one of the country's largest and most biodiverse protected areas and plays a strategic role in providing ecosystem services to the Valle del Cauca region. At Banco de Occidente, we have prioritized this territory as a key intervention area, recognizing its importance for the conservation of Andean ecosystems and for climate change mitigation and adaptation.

Through our partnership, we have supported **ecological restoration efforts using native species**, focused on the recovery of degraded areas and the strengthening of ecosystem resilience.

During the partnership period, we carried out **exclusively technical** active restoration processes (**excluding volunteer efforts**), achieving:

- ✓ 7,750 native seedlings planted.
- ✓ 11,79 hectares restored.
- ✓ Interventions defined in a participatory manner with local communities, landowners, and local organizations.
- ✓ Ongoing technical support from Colombia's National Natural Parks.

Sustained maintenance over the **three years of the project** was key to consolidating the plantations, increasing their resilience to extreme weather events, and ensuring the sustainability of the results, while strengthening local capacities for environmental management of the territory.

Environmental Volunteering and Conservation Education

Complementarily, we developed an environmental volunteer program in strategic sectors of the Park, such as **Peñas Blancas and the Pance River basin**, areas critical to the water security of more than **2,5 million people** in Valle del Cauca.

Through **nine volunteer workdays** held over three years:

- ✓ 568 volunteers actively participated
- ✓ 1,656 native seedlings were planted
- ✓ 1,2 hectares of Andean forest were restored

The sessions included planting activities, interpretive hikes, kokedama-making, and educational workshops, promoting knowledge about local biodiversity, water regulation, and soil stability.



Results and indicators —
Farallones de Cali National
Natural Park

Indicator	Result
Families involved	6 families (labor, supplies, and transportation).
Seedlings planted	2.500
Flora species	14
Seedling survival rate	Between 90% and 100%
Restored hectares	5,77 hectares.
Replantings carried out	3 replantings (2 in the last report, 500 seedlings).
Replanting sessions	3 (250 seedlings per day).
Maintenance	2 (weeding and fertilization in April and July 2025).
Strengthened agreements	2 (National Parks and voluntary PSA agreement with DAGMA).
Jobs created	6
Strengthened enterprises or livelihoods	6

La Playona and Loma La Caleta Integrated
Management Regional District (Acandí, Chocó)

The La Playona and Loma La Caleta Regional Integrated Management District (DRMI), located in the municipality of Acandí (Chocó), is a strategic ecosystem for biodiversity conservation and ecological connectivity in the Colombian Caribbean. This area plays a fundamental role in protecting biological corridors, regulating ecosystem services, and strengthening the livelihoods of local communities.

As part of our partnership, we prioritized this territory for the development of ecological restoration processes, with a focus on community participation, the recovery of degraded areas, and the generation of social and economic benefits for the local population.

During the three years of intervention, actions in the La Playona and Loma La Caleta DRMI focused on active restoration processes, achieving significant results:

- ✓ **8.000 native seedlings planted**
- ✓ **8 hectares restored**
- ✓ **6 plant species** incorporated into the restoration processes
- ✓ **Additional replanting** of 150 and 350 seedlings to enhance the survival of the plantings
- ✓ **An 80% survival rate**, reflecting the effectiveness of the implemented actions

The community-based approach was a central pillar of the project. Through the implementation of restoration activities:

- ✓ **Ten families** benefited through employment opportunities and the provision of supplies
- ✓ **11 local jobs** were created, boosting the community's income
- ✓ **One local business or livelihood** was established, contributing to the economic sustainability of the region

Indicator	Result
Families involved	10 community members were involved in labor and the supply of inputs.
Seedlings planted	8.000
Flora species	6
Seedling survival rate	80%
Restored hectares	8 hectares.
Replanting carried out	150 + 350 seedlings.
Maintenance	1 per property
Jobs created	11
Strengthened businesses or livelihoods	1



High Andean Forest — Chingaza National Natural Park buffer zone

The buffer zone of Chingaza National Natural Park represents a strategic area for **ecological connectivity in the central part of the country and the provision of essential ecosystem services**, such as water regulation and the conservation of Andean—Orinoco biodiversity. This ecosystem, located in the eastern Andes mountain range, plays a key role in protecting the habitat of emblematic species and maintaining biological corridors that connect Chingaza National Natural Park with the Eastern Hills of Bogotá.

We focused our efforts on **Conservation Core 6**, in the municipalities of La Calera and Choachí, prioritizing ecological restoration processes that would strengthen the connectivity of the **Sumapaz—Cruz Verde—Eastern Hills—Chingaza** corridor and contribute to the recovery of degraded natural vegetation.

Ecological Restoration and Territorial Coordination

During 2024 and 2025, we carried out active restoration efforts with a comprehensive approach, combining environmental, social, and educational actions:

- ✓ **5,000 native seedlings planted**, representing **9 plant species** of the high Andean forest.
- ✓ **5 hectares restored**, contributing to the recovery of natural vegetation key to biodiversity and water recharge.
- ✓ **A survival rate of 92%**, reflecting proper technical management and maintenance efforts.
- ✓ **Targeted replanting** (250 seedlings) to reinforce the consolidation of the restored areas.
- ✓ **2 maintenance activities** aimed at ensuring the stability and resilience of the plantations.

These actions were complemented by preventive measures to mitigate risks associated with forest fires and invasive livestock, such as the installation of perimeter fences, protecting the seedlings and ensuring the continuity of the restoration process.

The project actively engaged local communities and key stakeholders in the region, generating positive social impacts:

- ✓ **20 beneficiary families** involved in project activities.
- ✓ **10 temporary jobs** created during planting activities, using local labor.
- ✓ **8 agreements strengthened** for the conservation and sustainable management of the territory.
- ✓ **3 strengthened enterprises or livelihoods**, associated with environmental education, nursery operations, and home gardens.

Additionally, the project coordinated efforts with the **La Calera Rural Educational Institution and the Fundación Grupo Conserva**, strengthening environmental education, seed collection, socio-environmental research, and the training of young people as agents of change committed to environmental conservation.

Indicator	Result
Families involved	20
Seedlings planted	5,000
Flora species	9
Seedling survival rate	92%
Restored hectares	5 hectares.
Replanting carried out	1 (250 individuals).
Maintenance	2
Agreements strengthened	8
Jobs created	10 temporary jobs.
Strengthened businesses or livelihoods	3



PNN Via Parque Isla de Salamanca (VIPIS)

At Banco de Occidente, we contribute to the protection and restoration of strategic ecosystems in the Colombian Caribbean, such as the **Isla de Salamanca Park Corridor (VIPIS)**, a protected area of national and international significance due to its biodiversity and its key role in climate regulation, coastal protection, and the provision of ecosystem services.

VIPIS covers nearly **56.200 hectares**, of which **approximately 21% consists of mangrove ecosystems**—essential habitats for migratory birds, fish, crustaceans, and reptiles. However, these ecosystems have faced historical pressures such as forest fires, prolonged droughts, channel blockages, increased salinity, and the loss of more than **56% of the original mangrove cover**, making active and sustained intervention essential.

During the third year of the project, we made progress on an ecological restoration process focused on priority areas in **Clarín Viejo, Clarín Nuevo, and the Kilometer 36 sector**, with interventions covering approximately **3,5 hectares**, prioritizing areas with water deficits and high salinity.

The most significant actions included:

Planting of 2.500 mangrove seedlings, distributed as follows:

- ✓ *Rhizophora mangle* (red mangrove): 1.350 seedlings.
- ✓ *Laguncularia racemosa* (yellow mangrove): 1.150 seedlings.

Construction of ecological mounds:

- ✓ 500 mounds made from sediment and local organic material.
- ✓ Designed to improve soil conditions, flood management, and seedling survival.

Community work and shared governance:

- ✓ Partnership with the **Clarín Canal Users Association**.
- ✓ Participation of community organizations, with an emphasis on women's leadership.

Strengthening of the mangrove ecosystem, promoting the recovery of key habitats for fish, birds, crustaceans, and reptiles.

Positive social impact through the creation of local jobs, the strengthening of community ties, and the promotion of sustainable economic activities such as ecotourism.

Indicator	Outcome
Benefited families	Participation of community associations, especially women.
Seedlings planted	2.500
Plant species	2 (<i>Rhizophora mangle</i> and <i>Laguncularia racemosa</i>).
Seedling survival rate	80%
Restored hectares	3,5 hectares.
Replanting carried out	Not reported.
Maintenance	1 to date; periodic maintenance planned for 3 years.
Strengthened agreements	1 — Conservation Route.
Jobs created	350 community workdays.
Strengthened enterprises or livelihoods	Fish, crustaceans, birds, and reptiles associated with the mangrove.





Volunteering at Arví Park — Nare River Protected Forest Reserve

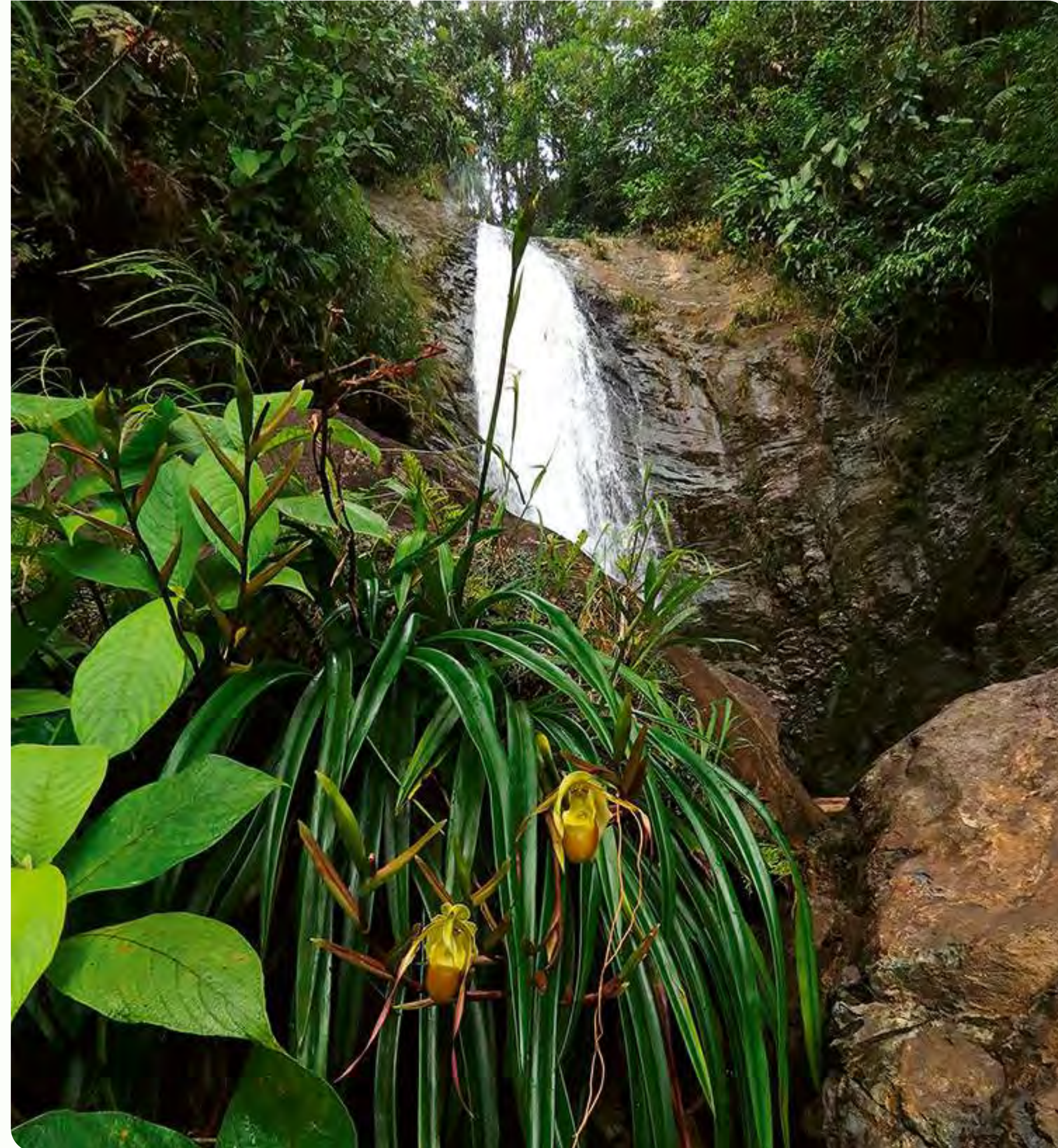
As part of our environmental volunteering strategy, we organize volunteer days at **Arví Park, located in the Nare River Protected Forest Reserve**, a key rainforest ecosystem for climate regulation, water supply, and ecological connectivity in the Aburrá Valley.

Although these activities are not part of the priority restoration areas of our partnership with WWF Colombia, they represent a **complementary experience of high environmental, social, and educational value**, strengthening the bond between our employees and the conservation of the country's strategic ecosystems.

Over the three years of the program's implementation, we achieved the following impacts:

- ✓ **223 employees participated** in five volunteer days.
- ✓ **282 native seedlings planted** during the first two years.
- ✓ **Adaptive replanting** carried out in the third year, in accordance with site conditions and ecosystem needs.
- ✓ **Complementary conservation activities**, which included:
 - ✓ Trail maintenance.
 - ✓ Wildlife monitoring.
 - ✓ Environmental education workshops with youth and visitors.

These actions were carried out in coordination with the **Arví Park Corporation**, promoting participatory restoration, responsible tourism, and social ownership of the territory.



Volunteering in Bogotá's Eastern Forest — Las Moyas Trail

As part of our environmental volunteer initiatives, we organized workshops in the **Bosque Oriental de Bogotá Protected Forest Reserve**, specifically on the **Las Moyas Trail**, a strategic ecosystem for climate regulation, ecological connectivity, and the city's air quality.

Although these events are not part of the priority restoration areas identified by the partnership with WWF Colombia, they represent a **complementary initiative aimed at raising awareness and promoting environmental action**, with a focus on employee participation and fostering a sense of ownership of the local area.

Volunteer Results

- ✓ **560 native seedlings planted.**
- ✓ **1 hectare restored.**
- ✓ Activities carried out **exclusively through volunteer events.**
- ✓ Focus on participatory restoration and environmental education.
- ✓ Implementation of the **Environmental Education Program** for employees, focused on best practices for saving and efficiently using natural resources.
- ✓ Development of the **“Together It's Possible — WWF”** course, aimed at biodiversity conservation and the adoption of responsible actions by all employees.



Planeta Azul National Ecology Award



SDG 6.3; 17.5; 13.2

The Planeta Azul National Ecology Award is one of our flagship initiatives to recognize, highlight, and strengthen projects that contribute to water conservation, biodiversity, and sustainable development in Colombia.

This **award, held every two years**, has established itself as a platform for bringing together companies, startups, social organizations, and academia, promoting innovative and replicable solutions to the country's environmental challenges.

Beyond the award itself, the Planeta Azul Award seeks to:

- ✓ Promote initiatives that generate a positive impact on water resource management and ecosystem conservation.
- ✓ Foster environmental innovation and the adoption of sustainable technologies.

- ✓ Promote education and social ownership of knowledge regarding environmental stewardship.
- ✓ Bring together public, private, and community actors around a common sustainability agenda.

In 2025, we will continue to strengthen this platform as a space for inspiration and connection, consolidating the **Planeta Azul Community** as a network for exchange and learning among winners and applicants from previous editions. In this way, the Award transcends one-time recognition and becomes a mechanism for collective mobilization toward the protection of water and biodiversity.



Empowering People and Communities



Banco de
Occidente

Grupo
AVAL



Human capital and talent management



SDG 8.3; 10.2

At Banco de Occidente, the development of people, their families, and communities is the central pillar of our sustainability strategy and long-term value creation. We believe that the development of human talent, the holistic well-being of our employees, and responsible engagement with the communities where we operate, including our commitment to social and financial inclusion, in are fundamental to building trust, enhancing productivity, and delivering a personalized, high-quality service experience to our customers.

Throughout 2025, we continued to strengthen a comprehensive human capital management approach, aimed at **creating inclusive, safe and motivating work environments** where every employee can develop their potential and contribute their experience to achieving the Bank's objectives. **This approach is based on principles of equity, respect, non-discrimination and inclusion, and recognizes that people's well-being and development are key to business sustainability.**

This chapter presents the main advances and results

in the areas of human capital, well-being and motivation, talent development and performance, diversity, equity, and inclusion, labor relations, occupational health and safety, as well as our commitment to communities and customers. Together, these elements reflect a coherent and coordinated management approach, aligned with our vision of responsible growth, innovation, and sustainability.

National and International Presence

GRI 2-1; 2-7; 2-8; 2-9; 2-23; GRI 2-30

The information for 2025 shows a solid national and international presence, supported by a workforce of 7.054 employees in our own operations who enable the Bank's operations in the various regions where it operates. **Bogotá, Cali, Medellín, and Barranquilla** account for the majority of our workforce, reflecting a distribution aligned with the Bank's operational structure. Overall, 38% of employees are covered by collective bargaining agreements, in line with the right to collective bargaining and freedom of association, demonstrating structured labor relations based on social dialogue and trust.

The workforce composition reflects a majority of women, who account for 59% of all employees (4.180 women). This trend is consistent across all regions and is particularly pronounced in cities such as Barranquilla (69%) and Medellín (62%), reaffirming the Bank's commitment to gender equality and equal opportunity, and the creation of diverse and inclusive work environments.



From an age perspective, the workforce in 2025 is characterized by a significant presence of people under 30, who account for 30% of the total. This composition reflects a young and dynamic workforce that coexists with other life stages and career paths, fostering the exchange of experiences and the long-term development of talent.



National and international presence

Total Bank

Total Employees: 7.054

% Collective Bargaining Agreement: 38%

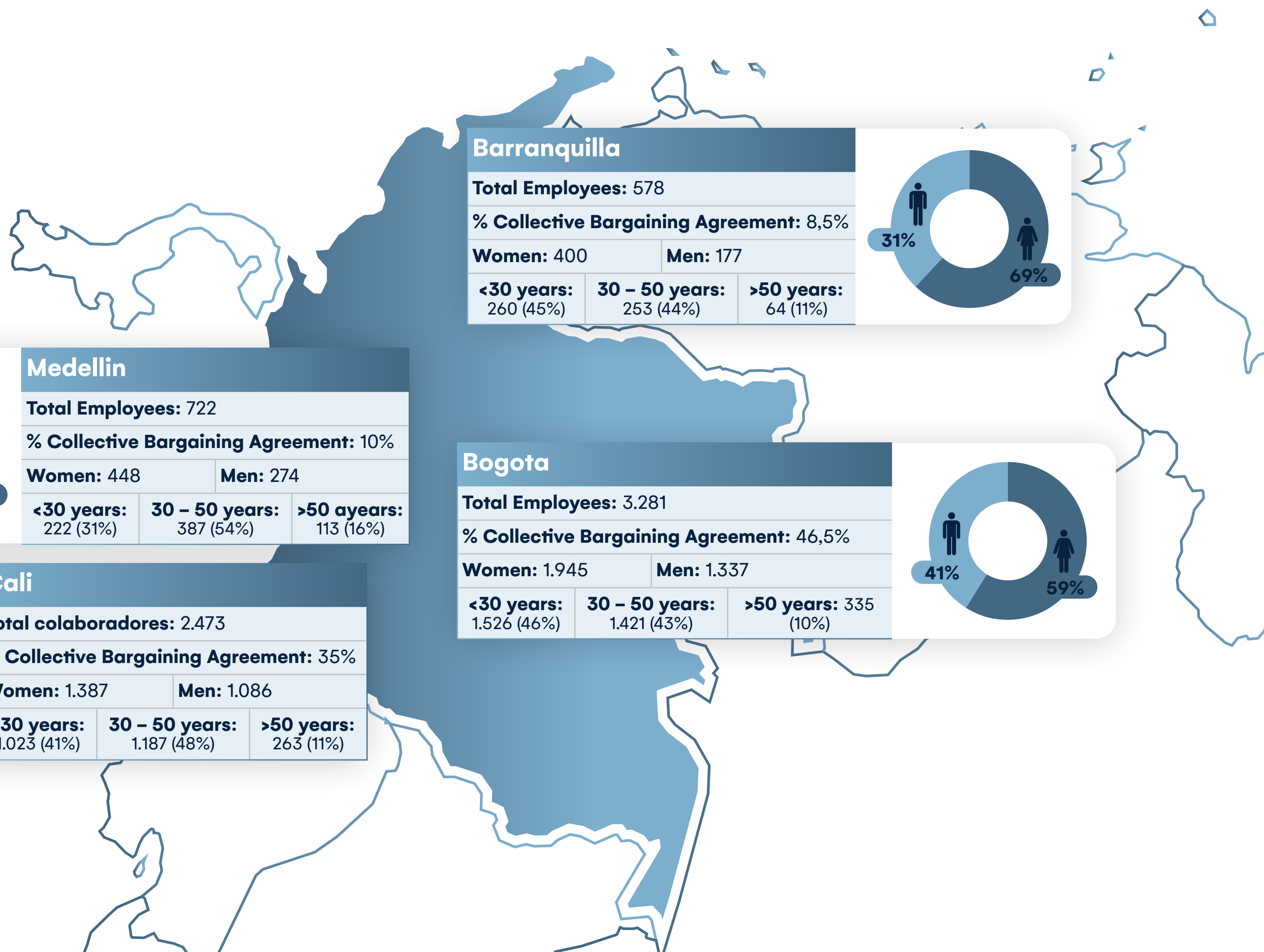
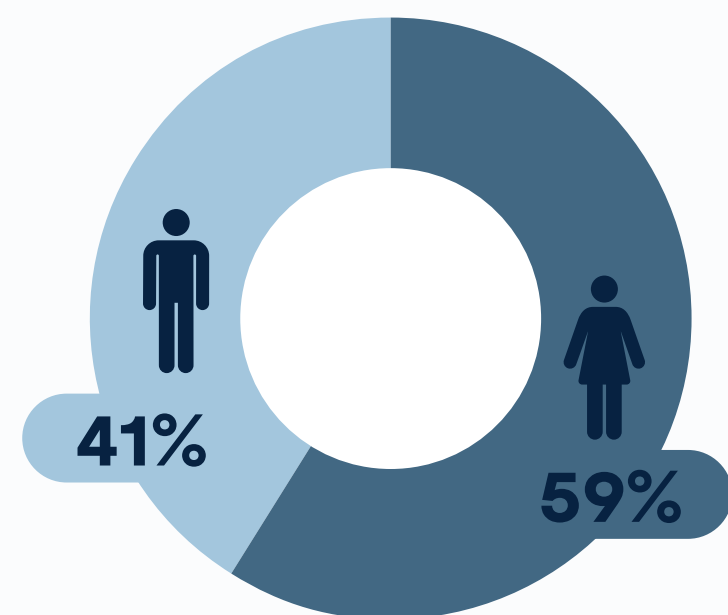
Women: 4.180

Men: 2.874

<30 years:
3.031 (43%)

30 – 50 years:
3.248 (46%)

>50 years:
775 (11%)





Employee Well-being

At Banco de Occidente, talent management is a fundamental pillar for business sustainability and the strengthening of organizational culture. We recognize that the commitment, well-being, and development of our employees are critical to achieving strategic objectives and delivering a consistent, high-quality service experience to our customers.

Throughout 2025, we continued to consolidate an integrated approach to talent management, which combines holistic well-being, skills development, performance evaluation, equity, and inclusion as complementary components of the employee experience. This approach allows us to support individuals throughout their career lifecycle and strengthen the alignment between individual goals and the Bank's strategic priorities.

Talent management is supported by structured processes for structured employee development programs, performance management and appraisal systems—including management by objectives frameworks and ongoing performance evaluations—, compensation schemes, and social dialogue mechanisms, aimed at promoting labor relations based on respect, transparency, non-discrimination, and continuous improvement. Through these practices, we seek to create work environments that foster professional growth, commitment, and our employees' contribution to the Bank's results.

Well-being and Motivation: Caring for Our People

BdO 13

At Banco de Occidente, we view well-being as an essential component of the employee experience and a key factor in engagement and performance. Therefore, we manage well-being from a holistic perspective that integrates the work environment, work-life balance, benefits, initiatives related to workplace stress management, flexible working arrangements, and organizational culture, with the goal of creating work environments where people feel valued, heard, and supported.

This approach is grounded in principles of equity, respect, and care, and recognizes that each employee contributes based on their own experience and unique circumstances. Through practices focused on physical, mental, and social well-being, we seek to strengthen a sense of belonging, foster work relationships based on trust, and promote a positive and collaborative work environment.

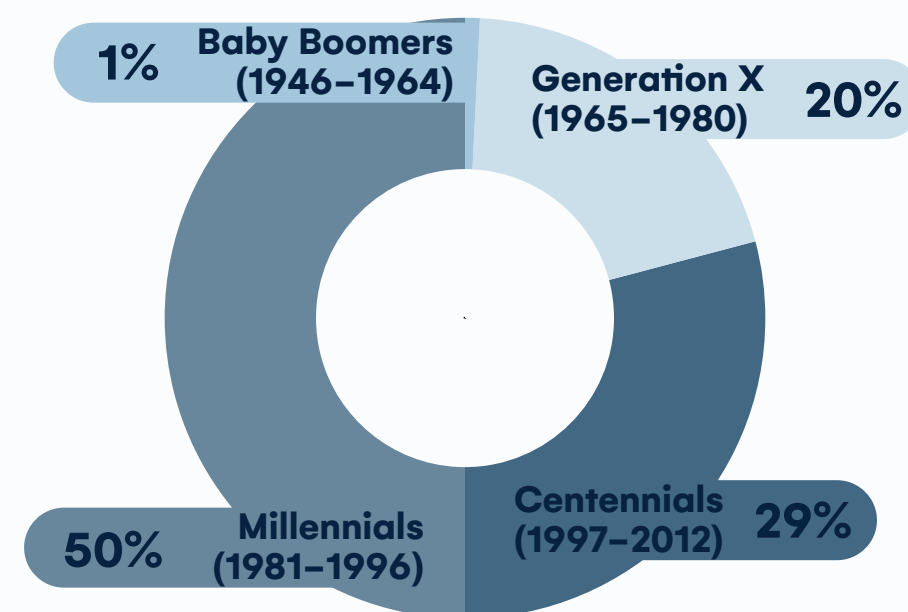
Well-being – Work Environment	2025	2024	2023	2022	What was the 2025 goal?
% of employees with the highest level of engagement, satisfaction, well-being, or NPS	95,00%	92,10%	87,60%	80,60%	94,2%
% of employees who responded to the survey	93%	93%	94%	92%	

In 2025, Banco de Occidente was recognized for the third consecutive year by Great Place to Work as the best place to work in Colombia, reflecting an organizational culture based on trust, respect, and equity. **99% of employees report being treated fairly, regardless of their gender, age, race, or sexual orientation, which reinforces corporate values and a sense of belonging.**



As a result of the measures implemented, workplace environment metrics showed a positive and sustained quantitative improvement throughout 2025. The engagement, satisfaction, and well-being index reached **95**, exceeding the goal set for the year, while participation in the survey remained at high levels (**93,00%**). These results demonstrate a culture of employee feedback and continuous improvement, as well as the impact of initiatives aimed at strengthening the well-being and experience of our employees.

Generational distribution of employees (range of birth years)



Our workforce is characterized by significant generational diversity, bringing together different life stages and career paths. This diversity enriches our daily work by integrating multiple perspectives, styles, and experiences, and allows us to build environments where, regardless of age or tenure, all employees enjoy equitable conditions, development opportunities, and an inclusive work experience.

Well-being is also strengthened through a comprehensive range of benefits, including flexible working arrangements and well-being initiatives, activities, and opportunities for integration, aimed at promoting work-life balance. The high participation and satisfaction levels recorded in well-being initiatives, supported by measurable engagement indicators, along with the introduction of new flexibilities, reflect the ownership of these actions and their contribution to strengthening camaraderie and motivation among employees.

Overall, the management of well-being and motivation in 2025 helped consolidate an organizational culture based on trust, respect, and recognition, strengthening the commitment of our talent and positioning the Bank as a leading employer in terms of employee experience and workplace practices.

Employee and Skills Development Programs



SDG 4.3; 10; GRI 404-2; 404-3

At Banco de Occidente, employee development is a key pillar for talent development and business sustainability. Through the corporate university “La U,” the Bank manages and systematically tracks training hours in a structured manner, consolidating a learning and development offering aligned with strategic priorities and the needs of the environment.

In 2025, training indicators showed a positive trend with consistent quantitative improvement compared to 2024. Total training hours increased by nearly

16%, while the average number of training hours per employee rose by a similar proportion, reflecting greater learning intensity and increased adoption of learning and development programs as part of the employee experience. This growth was driven, among other factors, by the introduction of the Blue Hour, an institutional initiative designed to promote continuous learning during the workday.

The Blue Hour, an institutional learning initiative, made it possible to expand access to learning content and development opportunities, facilitate employee participation, and reinforce the learning culture, complementing the offerings managed through “La U.” Its implementation directly contributed to an increase in training hours and the strengthening of employee capabilities and skills at various levels of the organization.

This growth was accompanied by an increase of nearly 5% in investment allocated to training, which demonstrates an efficient allocation of resources and a focus on high-impact programs. The increase in classroom hours is largely explained by the expanded coverage of training programs, the strengthening of virtual offerings, the incorporation of Hora Azul, and greater participation by employees in administrative, operational, and commercial roles.

Taken together, the results confirm the role of La U and the Blue Hour as key enablers of organizational learning and reflect the Bank’s commitment to the continuous development of talent as the foundation for performance, innovation, and long-term sustainability.

Management level	Men aged 18–30 years		Women 18–30 years		Men 30–50 years		Women 30–50 years		Men >50 years		Women >50 years	
	Hours	Avg.	Hours	Avg.	Hours	Avg.	Hours	Avg.	Hours	Avg.	Hours	Avg.
Senior Management	0	0	0	0	81	27,00	8	8,00	257	32,13	71	35,50
Middle Management	0	0	0	0	1.067	50,81	266	37,99	839	27,97	243	24,26
Commercial	2.311	37,27	2.498	43,08	10.638	37,19	20.746	38,00	3.448	34,83	4.117	32,94
Administrative	11.778	27,84	11.780	36,36	24.869	35,99	30.973	40,59	6.012	33,03	2.883	32,39
Operational	40.252	60,26	102.325	68,40	12.936	46,37	31.513	48,41	4.785	39,22	3.268	30,26
Total	54.341	47,13	116.603	63,20	49.590	38,65	83.506	42,60	15.340	34,86	10.582	30,06



In line with this model, employee development programs integrate principles of inclusion, equity, and accessibility across the board, recognizing the development of internal capabilities as a key dimension of the employee experience. Through in-person and virtual formats, strategic partnerships, and content tailored to different roles and levels, the Bank facilitates equitable access to learning, helps reduce skill gaps, and strengthens a culture of continuous learning.

Learning and Development Programs

Program	Purpose and Approach	Coverage 2025	Investment and Impact
Leadership Program	Strengthen essential leadership capabilities through a structured leadership development program in future leaders and employees assuming new management roles, promoting effective team mobilization and the creation of sustainable value.	344 employees 4,87% of the workforce	Investment: \$187.949.000 Impact: development of leadership capabilities, strengthening of managerial performance, and business sustainability.
“Developing Strategic Leaders” Training	Develop leaders with strategic vision in critical roles within the sales force, strengthening decision-making and sales management.	133 employees 1,9% of the workforce	Investment: \$103.399.000 Impact: specialization in sales leadership and contribution to the achievement of corporate objectives.
BdeO Mentoring Program	Promote mentoring and knowledge transfer and collaborative learning through business mentoring in leadership, communication, innovation, attention to detail, and technical mentoring.	458 participants (185 mentors and 273 mentees) 6,49% of the workforce	Investment: \$97.830.825 Impact: strengthening of internal talent, organizational knowledge management, and development of key competencies.
English Program	Strengthen language skills in work contexts, enhancing communication and professional visibility in global environments.	66 employees 0,93% of the workforce	Investment: \$68.310.000 Impact: improved global competitiveness and comprehensive talent development.
Continuing Education Programs in partnership with SENA, Camacoes, and BritCham	Promote digital transformation and sustainable innovation through digital transition and reskilling programs focused on artificial intelligence, business automation, disruptive technologies, emerging technologies, data-driven culture, and machine learning.	538 employees (7,63% of the workforce)	Investment: A direct investment of COP \$1.800.000 was made in food services to ensure optimal conditions for in-person training sessions. Impact: Strengthening of analytical capabilities, technology adoption, and the Bank’s competitiveness, aligned with ESG criteria.
Advanced High Commercial Performance Program — The Master KAM SME	Maximize commercial performance in the SME segment through practical solutions that increase productivity, effectiveness, and management speed.	297 employees (4,2% of the workforce)	Investment: \$483.399.805 Impact: Strengthening of commercial leadership, customer loyalty, and improvement in SME business performance.

The implementation of these programs represented an investment of COP \$942.688.630, aimed at strengthening human capital, developing strategic capabilities, and fostering innovation. Through these initiatives, the Bank continues to build a culture of continuous learning, responsible leadership, and digital transformation, which supports the sustainability and growth of the business.





Additionally, and with the aim of enhancing employability and supporting responsible career transitions, the Bank offers transition programs for retiring employees, designed to support and prepare employees for various stages of change, such as retirement or separation from the workforce. These initiatives promote the development of key competencies and the updating of knowledge, facilitating adaptation to new contexts and supporting the continuity of professional careers.

Gender / Year	Change 2025 vs. 2024	2025	2024	2023	2022
Men	-38 %	119.271,14	190.926,38	154.371,00	159.609,93
Women	+129 %	210.691,14	92.179,28	174.817,00	258.672,07
Total training hours	+17 %	329.962,28	283.105,67	329.188,00	418.282,00
Total amount invested in training	+5 %	3.446.355.019	3.284.311.601	N/D	N/D



The trend in training hours and associated investment confirms the consolidation of training as a strategic lever for talent development and the Bank's sustainability. Throughout the period analyzed, active learning management is evident, with adjustments to the intensity and focus of programs aimed at strengthening critical business capabilities.

Following the reduction in the total number of hours recorded between 2022 and 2023, associated with prioritization and operational efficiency processes, a 17% increase was observed in 2025 compared to 2024, reflecting a recovery in training efforts and a greater intensity and effectiveness of learning programs. This progress was accompanied by a 5% increase in investment allocated to training, demonstrating a more efficient allocation of resources and a growing focus on high-impact programs.

The total average number of training hours per employee increased by 25% in 2025 compared to 2024, reflecting a greater focus of programs and the strengthening of continuous learning as part of the employee experience. This trend demonstrates progress toward a more efficient and impact-driven employee development model, oriented toward the development of critical competencies with greater business impact.

Analysis by gender shows a more pronounced recovery in the average number of training hours for women, with a 27% increase, compared to 18% for men. This trend highlights increased female participation in training processes during 2025 and reinforces the Bank's commitment to equitable access to skills development, contributing to inclusion and the strengthening of talent at all levels of the organization.

In 2025, training hours grew by 17% and the average per employee increased by 25%, accompanied by a 5% increase in investment and greater participation by women in training programs, reflecting more efficient and inclusive learning management.

Gender / Year	Change 2025 vs. 2024	2025	2024	2023	2022
Men	+18 %	41,47%	35,10%	53,73%	54,89%
Women	+27 %	50,68%	39,96%	42,52%	61,52%
Total average	+25 %	46,92%	37,53%	48,13%	58,21%



The trend in average training hours per employee confirms the consolidation of training as a strategic lever for the Bank's capacity development and sustainability. Following a gradual decline between 2022 and 2024, associated with prioritization processes, operational adjustments, and changes in the workforce composition, a significant recovery in training intensity is observed in 2025.

Taken together, these results confirm a positive evolution of the training model, which is shifting from a coverage-focused approach to one of greater depth and impact, aligned with leadership development, employability, and preparing talent to respond to the Bank's strategic challenges.

Performance Evaluation

The performance evaluation process we manage at Banco de Occidente is based on management by objectives, which allows us to assess individual and organizational performance in a structured manner, in alignment with the Bank's strategic goals. This process is carried out using the Success Factors module, a tool we make available to our employees to facilitate objective, clear, and efficient evaluations.

During 2024 and 2025, the management of the performance evaluation process was structured around key milestones, integrating pedagogical, technological, and analytical strategies that strengthened its adoption and quality. During the planning phase and initial meeting, we promoted the clear definition of functional objectives, ensuring their alignment with corporate goals. This rollout was supported by internal communication campaigns,

open orientation sessions, digital guides, and live sessions designed to support employees at every stage of the process.

Complementarily, support was reinforced for employees who joined outside the established deadlines through personalized sessions and digital materials that facilitated their effective integration into the process. Additionally, a structured incident management system was established, enabling timely case handling and the generation of relevant analytical information for decision-making.

During the closing phase of the process, training sessions were held for leaders and teams, focusing on objective evaluation, effective feedback, reducing bias and promoting fair and objective performance assessments. These actions were complemented by the strengthening of soft skills such as communication, leadership, teamwork, and adaptability—essential for performance management consistent with the organizational culture.

In 2025, the Bank consolidated the implementation of the Mi Desarrollo 360 platform, which is a 360 degree performance appraisal system, available in the BdeO Development Universe, as an evolution of the pilot conducted in 2024. This tool was created with the purpose of strengthening talent development and organizational culture by enabling a multidimensional evaluation that integrates self-assessment, leader assessment, peer assessment, and, where applicable, employee assessment. Through this comprehensive view of performance and organizational behaviors, the Bank seeks to promote constructive feedback, identify development opportunities, and guide actions that strengthen leadership, collaborative work, and alignment with the Bank's values and strategy.

The platform incorporates advanced reporting features, individual access to downloadable reports, and automatic consolidation of results, enhancing traceability, data quality, and the user experience. This evolution represents a significant advancement in performance management by facilitating more agile, transparent processes focused on continuous learning.

Overall, the performance evaluation and career development process reflects Banco de Occidente's commitment to talent management based on management by objectives, ongoing feedback, and multidimensional performance appraisal, contributing to the strengthening of a high-performance culture and the organization's sustainability.





Achievements and Impacts of the Performance Evaluation Process

- ✓ **94% completion rate** of performance evaluations, reflecting high buy-in into the process by employees and leaders.
- ✓ Consolidation of a **competency- and objective-based evaluation model**, aligned with the Balanced Scorecard (BSC), which strengthens the coherence between operational management and corporate strategy; the **process is annual**, with stages including planning, mid-term monitoring, evaluation management, and closure, the latter consolidated in the first quarter of the following year.
- ✓ Strengthening the **quality of functional objective definition** through specific training and continuous support, improving clarity, measurability, and strategic alignment.
- ✓ Significant increase in **participation in support and training opportunities**, including live events, educational sessions, and personalized consultations.
- ✓ Implementation of **ongoing feedback and agile performance management mechanisms** that foster individual and collective development and strengthen a culture of continuous improvement.
- ✓ Integration of **development goals** as a mandatory component of the process, promoting technical and behavioral growth beyond operational results.
- ✓ Progress toward a more **objective, transparent, and analytics-driven** evaluation model using tracking dashboards and standardized criteria.
- ✓ Consolidation of the **Mi Desarrollo 360** platform as a multidimensional evaluation tool, strengthening traceability, data quality, and employee experience.

Employee Well-being Programs, Benefits and Social Protection

I GRI 401-2; 401-3; BdO-9 I

At Banco de Occidente, we promote a work environment that fosters employee satisfaction, productivity, and talent retention through programs and benefits designed to support work-life balance and employee well-being.

These initiatives include flexible work arrangements, paid parental (for primary and non-primary caregivers) and paid family or caregiving leave, as well as workplace support facilities such as breastfeeding/lactation rooms, which contribute to employees' overall well-being. Additionally, these initiatives help reduce absenteeism rates and employee turnover, thereby strengthening talent attraction and retention.

As a result, **the Bank continues to make progress in strengthening financial and non-financial performance indicators**, consolidating an inclusive, balanced work environment aligned with a sustainable growth strategy.





Benefit / program	2025		2024		2023		2022	
	# of employees	Amount (COP)	# of employees	Amount (COP)	# of employees	Amount (COP)	# of employees	Amount (COP)
Extra-legal bonus Starting in 2024, we changed the payment frequency from semi-annual to quarterly, improving employees' cash flow while maintaining the same payment terms.	6.299	66.177.770.487	6.307	61.072.387.397	6.243	55.801.318.248	6.578	50.640.324.182
Vacation Bonus Granted to employees with permanent contracts starting in their third year of accrued vacation.	3.698	18.507.542.420	3.495	17.403.084.329	3.883	17.464.966.458	4.069	14.222.888.037
Seniority Bonus (Contract Employees) For employees with permanent contracts; effective every 5 consecutive years. Paid in the payroll for the period in which the condition is met.	286	1.267.627.790	358	1.418.729.575	305	1.119.428.384	511	1.455.402.785
Seniority Bonus (Non-Contractual Employees) For employees with permanent contracts; effective every 5 consecutive years. It is paid out through a Voluntary Pension Fund administered by Porvenir.	489	5.546.180.647	551	4.701.104.943	472	2.740.067.591	276	1.477.126.370
Pension Withdrawal Bonus (Other Benefits) For employees with permanent contracts who meet pension eligibility requirements. Starting in 2024, it will be processed through Porvenir.	94	785.000.000	81	685.000.000	45	360.000.000	69	580.000.000
Variable compensation (Other benefits) Paid quarterly and includes the payroll for sales force employees who meet the performance targets for their roles.	1.427	16.443.185.603	1.324	13.028.462.269	1.499	18.610.884.383	1.689	20.712.716.655
Vehicle Bonus (Other Benefits) Paid quarterly and includes the payroll of sales force employees who meet the estimated budgets for their role.	179	3.976.752.400	183	3.012.459.572	203	2.339.663.081	224	4.184.369.066

The evolution of benefits and wellness programs between 2022 and 2025 reflects a sustained management approach aimed at strengthening financial well-being, stability and economic security, and recognizing employee tenure and performance. In 2025, there is an increase in the amounts allocated to key benefits, particularly those associated with liquidity and financial predictability, such as the extra-legal bonus, whose quarterly payment schedule, implemented since 2024, is consolidated during the reporting period.

Benefits linked to work-life balance, as well as those associated with seniority, show a positive trend. The vacation bonus registers an increase in both coverage and investment, while seniority bonuses—especially those paid through Porvenir—demonstrate the strengthening of long-term savings and planning mechanisms, aligned with employee retention and commitment.

Meanwhile, the retirement pension bonus consolidates its payment structure and shows an increase in coverage and amount during 2025, responsibly supporting responsible career transition programs for employees approaching retirement. Similarly, **benefits associated with commercial performance show a recovery compared to 2024, reinforcing the relationship between results, recognition, and motivation.**



Impacts generated:

At Banco de Occidente, these extra-legal benefits complement statutory social protection mechanisms and reflect a long-term vision focused on supporting employee well-being and social protection, strengthening talent retention, and supporting employees through the various stages of their working lives.

The design and administration of these benefits are based on equity, regulatory compliance, and financial sustainability criteria, prioritizing initiatives that generate a positive impact on the economic, personal, and family well-being of employees in our own operations with permanent contracts and that contribute to building a relationship of trust and long-term commitment.

Together, these benefits help strengthen employees' financial and personal well-being, providing greater liquidity throughout the year, savings opportunities, better expense planning, and access to social protection mechanisms beyond statutory requirements. In 2025, benefits management was consolidated through efficient administration, continuous portfolio adjustments, and communication and support initiatives, which ensured their proper implementation and understanding by employees.

This comprehensive approach reinforces commitment, satisfaction, and retention of talent, and helps foster a balanced, supportive work environment aligned with Banco de Occidente's sustainability strategy.

With the aim of enhancing the well-being and quality of life of our employees and their families, Banco de Occidente offers a benefits portfolio designed to support personal and family development. These initiatives contribute to building a work environment that promotes work-life balance and enriches the employee experience within the Bank.

Within this framework, we promote practices that prioritize holistic well-being through benefits such as flexible work arrangements that include flexible working hours, remote work options, and part-time work arrangements. These alternatives allow us to adapt to employees' diverse needs and support them throughout the different stages of their professional life cycle.

We also promote physical and mental health through initiatives such as sports activities, wellness programs, and events that encourage healthy lifestyle habits, including nature walks, marathons, and sports tournaments. In compliance with maternity and paternity leave regulations, we have paid parental leave policies that include 18 weeks for the primary caregiver and 2 weeks for the secondary caregiver, as well as adequate spaces for breastfeeding/lactation facilities, which facilitate a balance between family responsibilities and professional development.

Together, these benefits reflect our commitment to creating a flexible, inclusive, and healthy work environment where people can fully develop and contribute to the Bank's goals through their well-being.

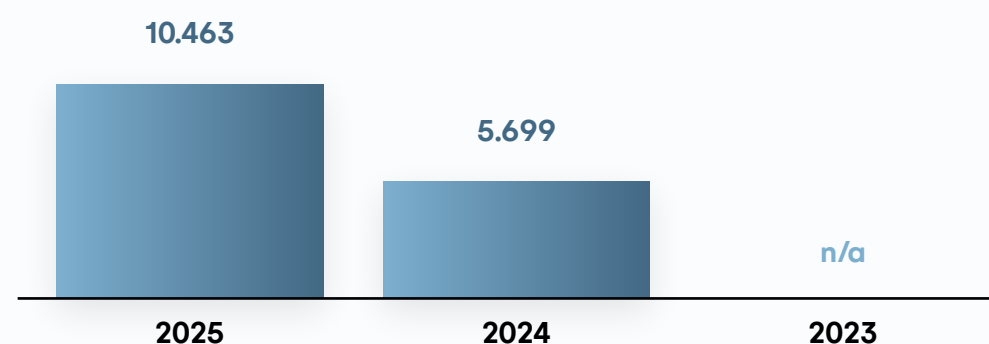




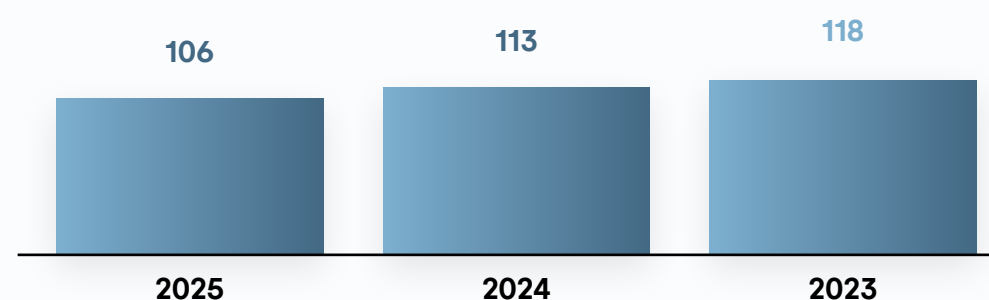
Family and Personal Life Benefits



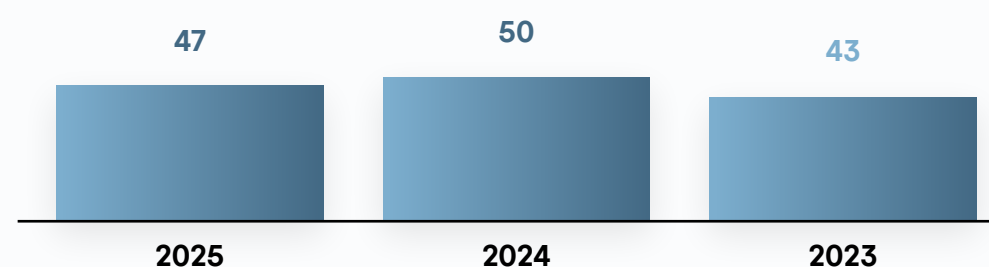
Family Day² One day per semester in accordance with the law. Use approved by the direct supervisor; no individual tracking. Applies to the entire organization. (The results presented for this item correspond to the total number of Family Days in the first and second semesters of 2025.



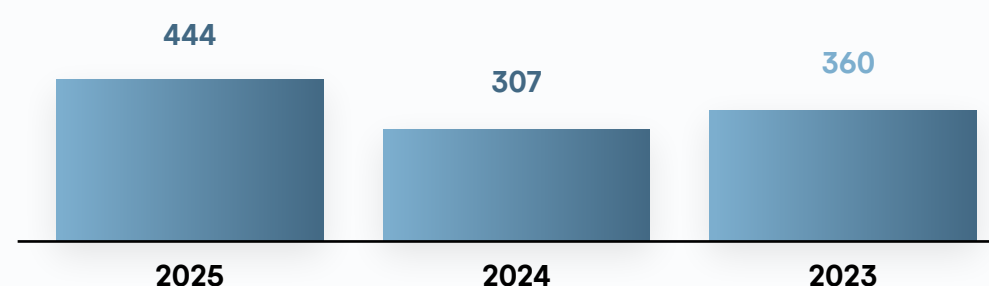
Maternity leave Two additional paid days beyond the statutory leave. Applies to the entire organization.



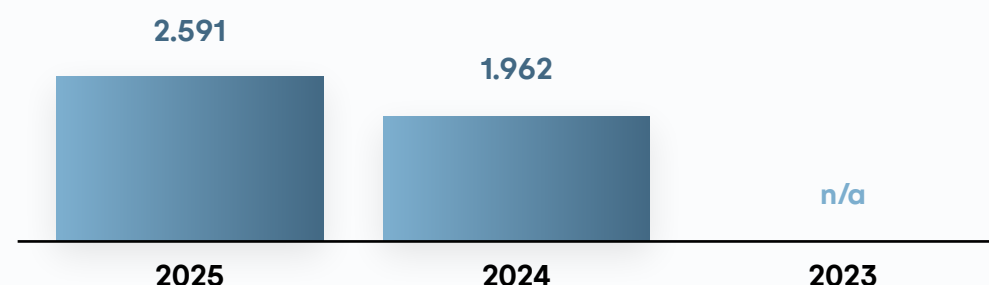
Paternity leave Two additional paid days beyond the statutory leave. Applies to the entire organization.



Bereavement leave Additional days based on the degree of kinship and location of the funeral, in accordance with internal policy. Applies to the entire organization.



Birthday Afternoon Half a paid workday (morning or afternoon). Use approved by the leader; no individual tracking. Applies to the entire organization.



The information presented shows sustained use of benefits focused on family and personal life, which have become a key component of employees' overall well-being. In 2025, there was a significant increase in participation in initiatives such as Family Day and Birthday Afternoon, reflecting greater ownership of these work-life balance opportunities and an organizational culture that actively promotes a balance between work and personal responsibilities.

Meanwhile, the use of benefits associated with maternity, paternity, and bereavement leave remains stable, consistent with workforce dynamics and current internal policies. Taken together, **these results confirm the importance of family benefits as enablers of commitment, satisfaction, and a positive, supportive experience for employees.**



Social and Financial Support Benefits

Benefit / Program	2025		2024		2023		2022	
	# of employees	# Amount (COP)	# employees	Amount (COP)	# employees	# employees	# partners	Amount (COP)
Marriage Leave Five paid business days per marriage or civil union. Applies to the entire organization.	75	n/a	91	n/a	34	n/a	75	n/a
Disaster leave Paid days based on specific family circumstances. Applies to the entire organization.	391	n/a	274	n/a	200	n/a	391	n/a
Educational Assistance Support for employee education and children's education (includes special education). Applies to employees under a collective agreement.	2.337	1.578.735.314	2.342	1.501.477.280	2.513	1.501.477.280	2.337	1.578.735.314
Other benefits: vision care, birth/adoption, marriage, death, and notary fees. Applies to employees under a collective agreement.	1.312	589.760.704	1.303	545.203.332	1.337	545.203.332	1.312	589.760.704
Life Insurance Policy to provide compensation to employees and beneficiaries in the event of death. Applies to all employees.	7.102	1.940.925.098	6.794	1.700.143.515	7.165	1.700.143.515	7.102	1.940.925.098
Health Insurance Coverage of medical excesses for employees and their families. Applies to those who enroll.	3.477	2.534.315.560	3.651	2.349.280.372	3.703	2.349.280.372	3.477	2.534.315.560

In 2025, the number of employees benefiting from marriage and bereavement leave increased compared to 2024, highlighting the importance of these supports during key moments in personal and family life.

Educational and other benefits maintain stable coverage, accompanied by an increase in the amounts allocated during 2025, reaffirming the Bank's commitment to the personal, educational, and family development of its employees. Similarly, life and health insurance continue to solidify their role as pillars of protection, with positive growth in coverage, strengthening the security and peace of mind of employees and their families.

Together, these benefits contribute to a more stable, inclusive, and supportive work experience, aligned with the Bank's wellness and sustainability strategy.



Employee Well-being and Quality of Life Benefits

Benefit / Program	2025		2024	
	# of employees benefiting	Investment (COP)	# of employees benefiting	Investment (COP)
Birth allowance Allowance for the birth or legal adoption of children (up to the fourth child).	79	38.255.000	66	30.747.500
Death benefit Financial support in the event of the death of family members who are financially dependent on the employee.	29	34.480.000	37	42.770.000
Education assistance — children or other family members Educational support from preschool through higher education and special education.	882	426.290.314	930	421.893.884
Educational Assistance — Employees Support for technical, technological, undergraduate, and graduate studies.	1.455	1.152.445.000	1.412	1.067.043.000
Deed Assistance Coverage of notary and deed registration fees up to the annual limit.	115	121.533.668	81	83.444.492
Marriage Assistance Financial assistance for civil or religious marriage (up to two times).	42	22.640.000	34	17.660.000
Vision Assistance Coverage for lenses, frames, contact lenses, or refractive surgery.	1.047	372.852.036	1.085	365.255.724
Home Loan Loan for the purchase of a new or used home for both unionized and non-unionized employees.	359	46.910.749.403	200	21.812.175.979

The information presented demonstrates the positive impact of benefits and financial support on strengthening employees' overall well-being. During 2025, increases were recorded in both coverage and investment allocated to benefits related to education, housing, and support during key moments in the personal and family life cycle. These advances reflect a management approach aimed at providing greater stability, encouraging retention, and improving the quality of life for our talent.

In this context, benefits are established as a key tool to support employees at different stages of their lives and contribute to fostering a balanced, inclusive work environment aligned with the Bank's sustainability strategy. To encourage participation in these benefits and continue strengthening the work environment within teams, Banco de Occidente implemented several key strategies:

✓ Benefit awareness and accessibility programs:

Internal campaigns were developed targeting different work teams and institutional onboarding sessions, with the aim of raising awareness of the benefits portfolio and access mechanisms. These actions included internal communications and group socialization meetings.

✓ Monitoring and support for leaders:

Training sessions were held with leaders and managers, aimed at strengthening their role in promoting, guiding, and supporting the proper use of benefits within their teams.

✓ Employee feedback mechanisms:

Satisfaction surveys were conducted during various activities to gather feedback and suggestions from employees. This information was used as a key input to refine initiatives and respond more effectively to the needs of our workforce.

✓ Continuous optimization of the benefits portfolio:

Based on the feedback received and trends in workplace well-being, adjustments and improvements were made to the benefits portfolio, including the addition of new activities and the expansion of those that were most popular.



✓ **Wellness and recreational activities:** Various initiatives were developed to promote integration, physical activity, and emotional well-being, including:

- ✓ **A bowling tournament**, which strengthens teamwork and integration.
- ✓ **Family movie nights**, which create opportunities to spend time with loved ones.
- ✓ **Beach volleyball, tejo, and marathon tournaments**, which promote physical activity and sportsmanship.
- ✓ **Volunteer activities**, which foster social responsibility and community ties.
- ✓ **Nature walks**, which foster contact with nature and physical and mental well-being.
- ✓ **Halloween and Christmas Novena celebrations**, which contribute to a festive atmosphere and foster camaraderie among employees.
- ✓ **Parents' Day**, focused on the well-being of employees' parents.
- ✓ **Retiree workshop**, focused on financial, psychosocial, and health preparation for the transition to retirement.
- ✓ **Gift distribution to employees' children**, which recognizes and values families during the holidays.
- ✓ **Recognition ceremonies**, which reinforce corporate identity and a sense of belonging.
- ✓ **Year-end parties**, which promote integration and a collective celebration of the end of the year.



Activity	2025			2024		
	Employees Impacted	Amount (COP)	Number of hours	Employees impacted	Monto (COP)	Número de horas
Bowling tournament	840	\$52.152.315,60	49	1.195	\$76.126.531,00	80
Family Film Screenings	956	\$39.942.773,40	32	1.595	\$57.297.264,00	29
Beach Volleyball Tournament	60	\$5.244.152,20	6	120	\$9.208.000,00	10
Tejo Tournament	90	\$3.845.000,00	8	—	—	0
Marathon	380	\$32.310.000,00	13	330	\$34.551.900,00	17
Volunteer programs / ecological volunteer programs	134	\$54.739.530,00	21	735	\$137.059.270,00	96
Nature walks	242	\$32.561.778,00	18	266	\$210.850.323,00	17
Halloween Celebration	488	\$8.666.600,00	12	287	\$3.592.000,00	11
Christmas celebration and novena	598	\$6.970.000,00	9	222	\$2.875.000,00	8
Day of Fulfillment	256	\$37.424.318,88	33	255	\$36.273.206,00	36
Retirees' Workshop / Retirement transition program	55	\$18.699.200,00	56	60	\$13.652.800,00	32
Gift delivery	2.730	\$245.987.026,00	112	2.663	\$238.189.600,00	108
Corporate recognition award program	538	\$254.809.770,08	31	554	\$211.906.185,00	23
Holiday Season	4.412	\$1.099.739.606,77	88	4.889	\$1.390.012.030,00	28
Total	11.779	\$1.896.092.071,93	488	13.171	\$2.421.593.109,00	495



In **2025**, the Bank reached **11.779 employees**, with a total investment of **COP \$1.896.092.071,93**.

Although 2025 saw a decrease in the total number of employees impacted and in investment compared to 2024, this change is primarily due to a shift in the focus of activities, prioritizing initiatives with greater impact, efficiency, and alignment with employees' needs. Activities such as **gift-giving, award ceremonies, and end-of-year parties** continue to attract the largest number of participants and resources, establishing themselves as key opportunities for recognition, integration, and a sense of belonging.

Complementarily, in 2025, initiatives related to **holistic well-being, physical activity, and environmental stewardship**—such as ecological volunteer work, hikes, and marathons—were strengthened, reflecting an evolution of the portfolio toward more diverse experiences aligned with healthy lifestyles and sustainability.

Variable Compensation

Our Variable Compensation Model is designed to recognize and reward high performance in commercial areas, strengthening a performance-driven culture aligned with the Bank's strategy. Through this scheme, we seek to incentivize the achievement of commercial objectives, while reinforcing measurement discipline and teams' commitment to achieving clear, shared goals.

Variable compensation is conceived as a recognition tool that directly links individual and collective effort to the results achieved. Its design allows us to support commercial management, motivate consistent performance, and recognize employees' contributions to business growth, while maintaining criteria of equity, transparency, and sustainability.

This model applies to sales teams and other strategic roles linked to value creation, and is managed according to the operational cycles of each function; additionally, it includes variable compensation components linked to short and long term performance outcomes. In this way, variable compensation not only contributes to the achievement of business objectives but also strengthens motivation, a sense of accomplishment, and employees' alignment with the Bank's strategic priorities.

Position/ Segment	2025			2024			2023			2022		
	Coverage	Budgeted Target	Target Achieved	Coverage	Budgeted target	Achieved	Coverage	Budgeted target	Achieved	Coverage	Budgeted target	Target achieved
VP Corporate	429	80%	49%	432	80%	35%	417	80%	57%	436	80%	82%
VP People	822	80%	53%	841	80%	39%	803	80%	43%	910	80%	58%
Treasury	45	80%	76%	45	80%	91%	44	80%	91%	44	80%	93%
Supernumeraries	31	80%	45%	68	80%	54%	35	100%	42%	38	80%	84%



Corporate VP: Segment VP, Regional Managers, Sales Directors, Sales Managers, Sales Executives.



VP People: Commercial Division Managers, Regional Managers, Commercial Directors, Coordinators, Commercial Managers, Commercial Executives, Service Advisors



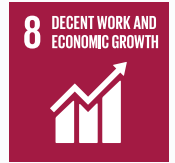
Treasury: Division Manager, Branch Assistant Managers, Treasury Directors, Investment Administrators



Supernumeraries: VP Corporate VP People: Commercial Managers Commercial Executives



Hiring and Rotation



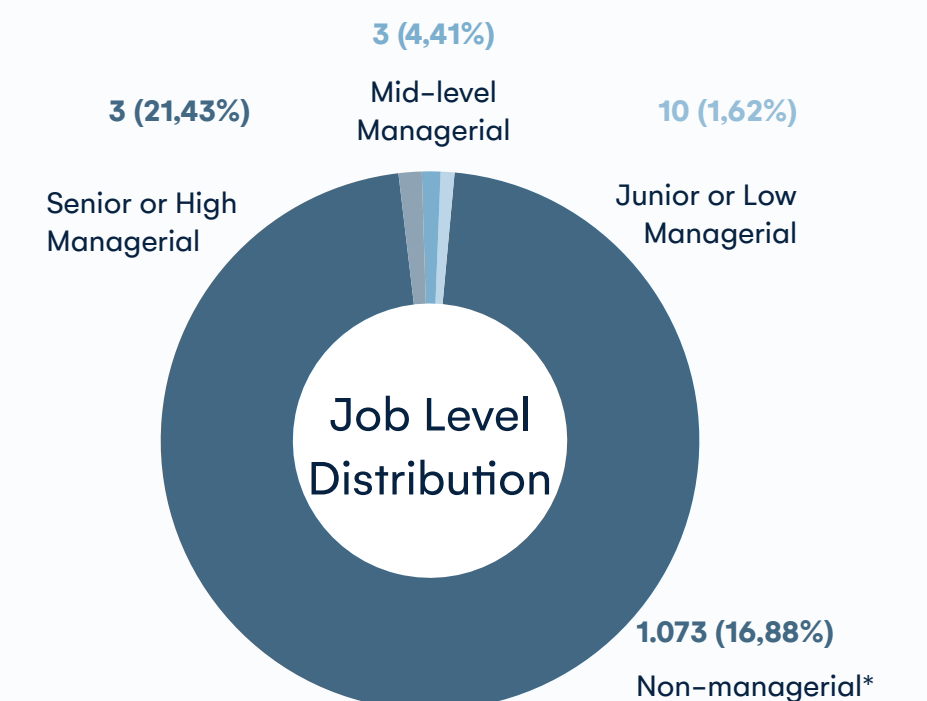
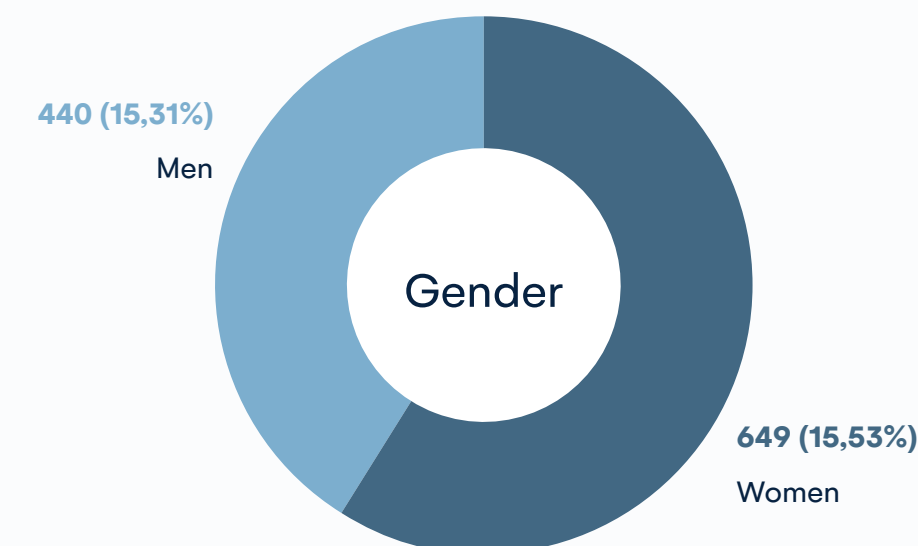
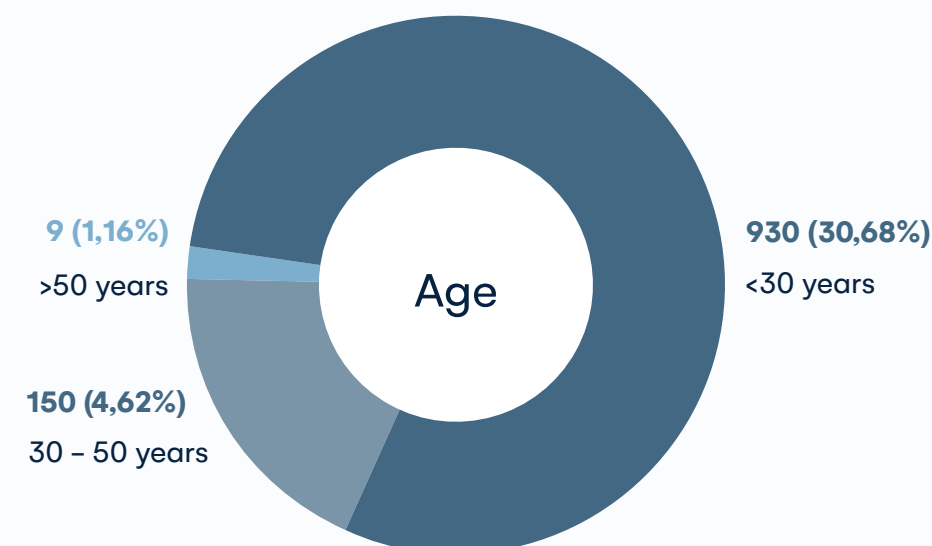
SDG 8.5
I GRI 401-1; BdO-8 I

At Banco de Occidente, the onboarding of new employees and staff turnover are fundamental components for maintaining a healthy, productive work environment aligned with business objectives. Through structured and efficient selection processes, we seek to attract and integrate talent with the necessary skills to effectively contribute to the fulfillment of the Bank's strategy. Complementarily, we proactively manage turnover with the aim of preserving organizational knowledge, promoting stability, and strengthening long-term commitment.

This approach is not only focused on attracting talent but also on building an environment where employees feel valued, supported, and have real opportunities for development. In this way, we strengthen a solid organizational culture that drives the continuous growth of our people and contributes to the Bank's sustainable performance.

Dimension	Indicator	Total Bank		Bogotá		Cali		Medellín		Barranquilla	
		Number	Rate	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Ages	Hiring employees under 30:	930	30,68%	459	30,08%	276	26,98%	74	33,33%	121	46,54%
	Hiring of employees aged 30—50:	150	4,62%	82	5,77%	39	3,29%	20	5,17%	9	3,56%
	Hiring of employees over 50:	9	1,16%	8	2,39%	1	0,38%	0	0,00%	0	0,00%
Gender	Total number of women hired	649	15,53%	322	16,56%	165	11,90%	61	13,62%	101	25,25%
	Total hiring of men	440	15,31%	227	16,98%	151	13,90%	33	12,04%	29	16,38%
Job level distribution	Total Hiring Junior Management Level	10	1,62%	6	2,20%	3	1,20%	1	1,89%	0	0,00%
	Total Hiring Middle Management Level	3	4,41%	3	10,00%	0	0,00%	0	0,00%	0	0,00%
	Total Hiring: Senior or Executive Management Level	3	21,43%	3	37,50%	0	0,00%	0	0,00%	0	0,00%
	Non-Management Hiring (Specialists, Analysts, Assistants)	1073	16,88%	537	18,07%	313	14,35%	93	13,92%	130	24,30%

Number and Hiring Rates





Dimension	Indicator	Total Bank		Bogota		Cali		Medellin		Barranquilla	
		Number	Rate	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Age	Total turnover of employees under 30	389	12,83%	225	14,74%	90	8,80%	37	16,67%	37	14,23%
	Voluntary turnover of employees under 30	273	9,01%	168	11,01%	63	6,16%	29	13,06%	13	5,00%
	Total turnover of employees aged 30—50	212	6,53%	94	6,62%	67	5,64%	29	7,49%	22	8,70%
	Voluntary turnover among employees aged 30—50	153	4,71%	67	4,71%	51	4,30%	21	5,43%	14	5,53%
	Total turnover of employees over 50 years old	42	5,42%	27	8,06%	11	4,18%	4	3,54%	0	0,00%
	Voluntary turnover of employees over 50	28	3,61%	18	5,37%	8	3,04%	2	1,77%	0	0,00%
Gender	Total turnover of women	352	8,42%	187	9,61%	93	6,71%	40	10,00%	32	7,14%
	Voluntary turnover among women	247	5,91%	136	6,99%	69	4,97%	30	7,50%	12	2,68%
	Total turnover of men	291	10,13%	159	11,89%	75	6,91%	30	16,95%	27	9,85%
	Voluntary turnover among men	207	7,20%	117	8,75%	53	4,88%	20	11,30%	15	5,47%
Job Level	Total turnover Junior management level Low	19	3,08%	7	2,56%	10	4,00%	0	0,00%	2	4,88%
	Voluntary turnover: Junior management level (low)	15	2,43%	7	2,56%	10	4,00%	0	0,00%	2	4,88%
	Total Turnover Middle Management Level	2	2,94%	1	3,33%	1	2,78%	0	0,00%	0	0,00%
	Voluntary turnover, Middle Management	0	0,00%	1	3,33%	1	2,78%	0	0,00%	0	0,00%
	Total Turnover Senior or Executive Management Level	2	14,29%	1	12,50%	1	16,67%	0	0,00%	0	0,00%
	Voluntary turnover at the senior or executive management level	2	14,29%	1	12,50%	1	16,67%	0	0,00%	0	0,00%
	Total turnover, non-managerial level (specialists, analysts, assistants)	620	9,76%	337	11,34%	156	7,15%	70	10,48%	57	10,65%
	Voluntary turnover, non-managerial level (specialists, analysts, assistants)	437	6,88%	337	11,34%	156	7,15%	70	10,48%	57	10,65%





In 2025, Banco de Occidente consolidated its internal mobility strategy, ensuring that 7 out of every 10 vacancies were filled by talent from within the organization. Of a total of 2,994 open positions, 2,018 were filled by internal employees, representing an internal coverage rate of 67,4%.

This result demonstrates significant progress compared to 2023, when internal coverage stood at 57,6%, representing an increase of nearly 10 percentage points in the promotion of internal talent.

Talent Vacancy Coverage

General	2025		2024		2023		2022	
	Vacancies Created	Filled Vacancies	Vacancies Created	Positions Filled	Vacancies Created	Filled Vacancies	Vacancies Created	Filled Vacancies
Number	2047	1684	2252	1785	1103	N/A	N/A	N/A
Percentage	82 %		79 %		N/A		N/A	

These results reflect the Bank's commitment to development, career advancement, and talent retention, strengthening an organizational culture that values the internal growth and professional development of its employees.

Withdrawals 2025	Total Bank	Bogotá	Cali	Medellín	Barranquilla
Total desired withdrawals	643	346	168	70	59
Total unwanted withdrawals	454	253	122	52	27
Total Rate	9,62 %	11,11 %	7,06 %	10,28 %	11,57 %
Voluntary rate	6,79 %	8,12 %	5,13 %	7,64 %	5,29 %



Collective Bargaining

GRI 2-30

At Banco de Occidente, collective bargaining is a fundamental pillar of labor relations and a key mechanism for promoting fair, stable, and equitable working conditions. Through formal social dialogue processes, the Bank seeks to build agreements that recognize employees' interests, strengthen trust, and contribute to a work environment based on respect and shared responsibility.

Collective bargaining is conducted within a framework of regulatory compliance, transparency, and good faith, guaranteeing the exercise of the right to association and freedom of association. Current collective agreements cover a representative portion of the workforce and establish conditions related to compensation, benefits, well-being, job stability, and other relevant aspects of the employment relationship, contributing to employee retention and satisfaction.

During the reporting period, the Bank maintained the applicable collective agreements and labor pacts in force, ensuring their proper implementation and compliance with the commitments made.

	Men		Women		Total
	Covered by Collective Agreement	Non-agreement	Affiliated	Non-affiliated	
Bogota	413	924	951	993	3,281
Cali	250	836	497	890	2,473
Medellin	94	180	204	244	722
Barranquilla	86	91	174	227	578
Total BDO	843	2,031	1,826	2,354	7,054

In addition, the Bank promotes ongoing communication channels with labor unions and employee representatives, which allows us to anticipate situations, resolve concerns in a timely manner, and foster a work environment based on dialogue and cooperation. This preventive approach contributes to stable labor relations and the operational continuity of the business.

Overall, the Bank de Occidente's approach to collective bargaining reinforces a model of mature and constructive labor relations, aligned with business sustainability, respect for labor rights, and the comprehensive well-being of employees. These processes enable the establishment of balanced agreements, strengthen trust between the parties, and support talent development in a stable and predictable work environment.





Diversity, Equity, and Inclusion



SDG 8.5; 10.2

At Banco de Occidente, we view diversity, equity, and inclusion (DEI) as an essential part of how we do business and interact, both within the organization and with our customers. Throughout 2025, this approach went beyond mere principles, translating into concrete actions aimed at strengthening our organizational culture, preventing any form of discrimination, harassment and unequal treatment, and promoting work and service environments that are safe, equitable, and accessible to everyone.

This path is grounded in a clear and coherent framework that integrates our Human Rights Policy and Human Rights Due Diligence framework, Code of Ethics and Conduct, Internal Work Regulations, and the People's Manifesto. These guidelines reflect a shared conviction: respect for human rights and human dignity and the valuing of merit and competencies as the foundation for hiring, development, and professional growth, ensuring equal opportunities at every stage of the employment cycle.

Throughout 2025, we continued to strengthen DEI as a structural component of our culture, fostering diverse work environments free from discrimination, violence, or harassment. Under a managed meritocracy approach, we promoted selection, evaluation, and promotion processes centered on skills and performance, actively reducing the risks associated with conscious or unconscious biases.

As part of this process, we continue to promote initiatives that reinforce respect for individuality and inclusion in the Bank's day-to-day operations. Notable among these are the **"Mi Estilo BdeO"** dress code, which eliminates gender-based guidelines and promotes the free expression of identity, as well as the adaptation of employee benefits to recognize diverse family structures in an inclusive manner, including the extension of marriage leave to unmarried couples.

At Banco de Occidente and our subsidiaries, we focus on talent rather than labels, in line with the principles established in our **People's Manifesto**, designed as part of the action plans derived from our **Human Rights Due Diligence** exercise and launched in 2025. Guided by this conviction, we promote selection and development processes based on a managed meritocracy, in which hiring and professional growth are based exclusively on competencies and skills, ensuring that gender, sexual orientation, or other personal characteristics do not represent barriers to accessing job opportunities. These actions help close the inclusion cycle, reinforcing a clear message: at the Bank, merit is the primary driver of professional development and growth.

In 2025, the launch of the People's Manifesto established itself as a significant milestone in the management of diversity, equity, and inclusion, translating human rights commitments into a living cultural guide that shapes our decisions, behaviors, and relationships, both within the organization and in our interactions with our clients and other stakeholders.





In this context, we continue to actively participate in Asobancaria's Social Protocol, a sector-wide initiative that promotes best practices in equity, diversity, and inclusion within the Colombian financial system. Through this initiative, we strengthen our work on four key fronts: internal culture, financial education and inclusion, the development of a more inclusive value proposition, and the responsible management of financial risks.

Complementarily, during 2025 we took a step forward in training, evolving from general awareness-raising processes toward more specialized and technical training programs. This progress has allowed us to put the principles of diversity and inclusion into daily practice, strengthening our teams' capabilities to provide attentive, respectful service that meets our clients' needs.

Key initiatives include:



“Diverse and Inclusive Service — Friendly Biz” course, in which **2.286 employees** were trained, strengthening their skills in engaging with diverse populations, including older adults, people with disabilities, the LGBTIQ+ community, and ethnic groups.



Specialized training for strategic areas, such as the **Processes and Projects** team (**40 employees**), addressing the identification of unconscious biases, the adoption of the People's Manifesto, and the integration of DEI criteria into the design of processes and products.

These actions help strengthen the Bank's capacity to prevent discriminatory practices and promote equitable and respectful treatment in **all** our spaces, both within the organization and in our relationships with our customers.



Technical course on Service for People with Disabilities, in which **6.016 employees** participated, focused on recognizing different types of disabilities and implementing reasonable accommodations for dignified and accessible service.

In this same vein, gender equity remains a priority focus of our management, approached from a comprehensive perspective that combines strengthening organizational culture with creating economic opportunities, recognizing that both aspects are key to advancing toward fairer and more inclusive environments.

Internally, we launched the **#MujeresQueInspiran** campaign, accompanied by forums for dialogue and reflection on women's leadership, monitoring and addressing the gender pay gap, and participation in decision-making spaces. In 2025, women accounted for **59,22% of the total workforce, 42,64% of management positions, and 25,92% of senior leadership roles**, demonstrating sustained progress in women's participation in leadership roles.

Externally, we strengthened our value proposition for women-led companies, highlighting:

- ✓ **A working capital line for Women-Owned SMEs**, with special terms to foster their growth.
- ✓ Access to the **Banco de Occidente Business Community**, along with business intelligence tools such as the Business Environment Report and sector reports.
- ✓ Training and support initiatives, such as the **“Lecciones Pyme”** podcast, focused on women's leadership, digital transformation, and business competitiveness.

Complementarily, we participate in high-impact initiatives such as Women Working for the World and Women in Connection, platforms that allow us to strengthen women's leadership networks, exchange insights, and adopt best practices to continue promoting equity at the senior management level.

In line with the principles of the People's Manifesto, we do not use diversity hiring quotas. However, we promote proactive measures aimed at expanding access to job opportunities and reducing structural barriers, convinced that inclusion is built by creating real conditions for talent to develop on an equal footing.

In 2025, women accounted



59,22%
total workforce



42,64%
management positions



25,92%
senior leadership roles



Key achievements include:

- ✓ Participation in recruitment events such as **Wetrade** and **We Grow**, organized by the Chamber of Diversity, where we received approximately **80 resumes** from individuals belonging to underrepresented groups.
- ✓ Consolidation of the partnership with **SENA**, focused on technical training and employability for young people. In 2025, this strategy enabled the **placement of 64% of participants**, a significant improvement over the **40% achieved in 2024**.

As part of our commitment to monitoring and managing diversity within the organization, **in 2025 we reported the following composition of our workforce, as a basis for evaluating progress, identifying opportunities for improvement, and continuing to strengthen increasingly equitable and inclusive environments.**

Category	Share of Total Workforce	% of total workforce
Black or African American	245	3,47%
Mixed-race, Hispanic, or Latino	5895	83,57%
Indigenous or Native American	90	1,28%
LGBTIQ+	157	2,23%
Other (Specify)	667	9,46%



Diversity indicators

GRI 405-1

Diversity indicator	2025	2024	2023	2022
% of women in the total workforce.	59 %	59 %	59 %	59 %
% of women in all management positions, including junior, middle, and senior management.	42 %	43 %	42 %	43 %
% of women in junior management positions, i.e., at the first level of management.	45 %	45 %	45 %	45 %
% of women in senior management positions, i.e., up to two levels below the CEO or comparable positions.	24 %	26 %	22 %	24 %
% of women in management positions in revenue-generating functions.	49 %	48 %	48 %	53 %
% of women in STEM-related positions.	40%	43 %	31 %	35 %

In 2025, indicators show that Banco de Occidente maintains a solid and stable female workforce, with women accounting for 59% of the total workforce. The presence of women at various management levels remains consistent, reflecting a sustained base of female leadership and responsible talent management.

Women's representation in management positions remained around 42% throughout 2025, reflecting stability at leadership levels and the continuity of a solid base of female talent in the succession pipeline. This trend demonstrates that, while progress in representation requires time and consistency, the Bank has succeeded in maintaining a significant presence of women in decision-making roles.

At the senior management level, female representation stood at **25% in 2025**. The period was marked by **significant qualitative advances in leadership**, such as the appointment of the **first woman to the Bank's Executive Committee, Ángela Maria Ceballos**, as well as the appointment of **Juana Beltrán Echeverri as Head of the Legal Division**. These milestones reflect a significant step toward opening strategic spaces for women in leadership and reinforce the Bank's commitment to increasingly diverse and inclusive decision-making, beyond the annual evolution of the indicators.

Positive progress stands out in **revenue-generating functions and STEM roles**, where female participation continues to strengthen compared to previous years, demonstrating concrete efforts to reduce gaps in

strategic business areas. At the senior management levels, although challenges remain in accelerating parity, structural progress continues, laying the groundwork for further advancement.

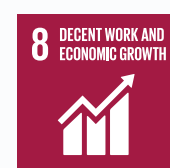
Overall, the results confirm that the Bank is making gradual and consistent progress in managing gender diversity, prioritizing the sustainability of these advances and the creation of increasingly equitable and inclusive work environments, in line with its human rights approach.

Looking ahead to the coming years, we identify as challenges the deepening of external partnerships that promote workplace inclusion and the strengthening of metrics that allow us to measure, in a more comprehensive manner, the impact of DEI actions in the medium and long term. At the same time, we recognize significant opportunities in the progressive incorporation of diversity and inclusion criteria into the design of products, services, and channels, with the aim of continuing to build a banking experience that is increasingly accessible, equitable, and people-centered.





Human rights



SDG 5.5 | 8.5 | 10.2 | 16

At Banco de Occidente, human rights management made significant progress in 2025 regarding its Human Rights Due Diligence approach: we shifted from an approach focused primarily on commitment and compliance to a more structured model of management, prevention, mitigation, addressing human rights impacts and continuous improvement, integrated across our own operations, subsidiaries, processes and business relationships, progressively including suppliers and partners. This progress stems from the strengthening of our social governance and the consolidation of human rights due diligence as a strategic tool to anticipate risks, manage impacts, and promote responsible and sustainable relationships throughout our value chain.

In 2025, the Bank reaffirmed and deepened its commitment to respecting and promoting human rights, backed by a **current Human Rights Policy approved by the Board of Directors** and applicable to all our operations, subsidiaries, and business relationships. In line with this, this commitment translated into greater integration into the Bank's day-to-day operations, strengthening the incorporation of a human rights approach into key instruments such as the **Code of Ethics and Conduct, the Internal Work Regulations**, and decision-making forums related to sustainability and risk management.

Our management remains aligned with widely recognized international standards, such as the **United Nations Guiding Principles on Business and Human Rights, the ILO Core Conventions, the OECD Guidelines for Multinational Enterprises, and the Sustainable Development Goals**, as well as with applicable national regulations in the jurisdictions where we operate.

Current Human Rights Policy



Human Rights Due Diligence

In 2025, the Bank established a structured and ongoing Human Rights Due Diligence process, which allowed us to move from a more general identification of risks to a more systematic and evidence-based management approach. This process covers **100%** of our operations and progressively incorporates suppliers, contractors, partners, clients, and new business relationships. Due diligence is carried out through the following stages:

- Analysis of the regulatory, sectoral, and institutional context.
- Proactive identification of risks and impacts through internal consultations, analysis of external information, and benchmarking exercises.
- Assessment and prioritization of risks, considering their severity, probability, and the Bank's level of involvement.
- Definition and implementation of action plans aimed at preventing, mitigating, and remedying impacts.
- Monitoring and periodic updating of the risk mapping and the measures adopted.



Category	A. % of the total assessed over the last three years	B. % of the total assessed (column A) where risks have been identified	C. % of risk (column B) with mitigation actions adopted
Own operations (including joint ventures in which the company has management control)	100%	100% (21 risks were identified in the operation)	100% (an action plan and control matrix were defined for all risks)
Tier 1 contractors and suppliers (as a % of Tier 1 contractors or suppliers)	100%	100% (1 specific risk was identified for the supply chain)	100% (controls were established and human rights criteria for suppliers were strengthened)
Joint ventures (including stakes greater than 10%) (as % of joint ventures) Not applicable as we have no joint ventures with stakes exceeding 10%.	0%	0%	0%

As a result of this process, traceability of identified risks and consistency between findings, implemented actions, and monitoring mechanisms were strengthened during the period.



Identification of Potentially Vulnerable or At-Risk Groups and Impact Assessment

The due diligence exercise allowed us to deepen our understanding of the main actual and potential human rights risks, both in our direct operations and throughout the value chain.

Among the prioritized issues are:

- Decent working conditions, occupational health and safety.
- Prevention of workplace and sexual harassment.
- Diversity, equity, inclusion, and non-discrimination.
- Freedom of association and collective bargaining.
- Protection of personal data and privacy.
- Access to clear information and financial services under fair conditions.
- Potential social impacts associated with funded projects.
- Labor practices of suppliers and partners.

The stakeholders prioritized in this analysis include our employees, supplier employees, individual customers, and local communities, considering their level of exposure, vulnerability, and the potential severity of impacts.

The Bank maintains a **zero-tolerance** policy toward any form of human rights violation, including discrimination, harassment, forced and child labor. In line with this commitment, we work to **prevent, identify, and mitigate** risks associated with **human trafficking, forced labor, and child labor**, both in our operations and in our supply chain, guided by international standards such as the **United Nations Guiding Principles on Business and Human Rights**, the **OECD Guidelines for Multinational Enterprises**, and the **ILO Core Conventions**.



Mitigation and Remediation Measures

In 2025, the Bank strengthened its framework of preventive, mitigation, and remediation measures in human rights, with the aim of ensuring comprehensive coverage across the entire operation. Among the main actions implemented are:

- ✓ Updating and strengthening internal policies related to workplace and sexual harassment, work-life balance, and ethical conduct.
- ✓ Ongoing training programs for employees and leaders on human rights, diversity, equity, and inclusion, freedom of association, and personal data protection.
- ✓ Operation of specialized committees, such as the Workplace Relations Committee and the Sustainability Committee, which support monitoring and decision-making on these issues.
- ✓ Integration of human rights criteria into key processes, including supplier management, environmental and social risk assessment (SARAS), and due diligence for clients and funded projects.

Reporting and Complaint Mechanisms

In 2025, we took a significant step toward strengthening our response and redressing mechanisms by explicitly incorporating a human rights approach into the Ethics Hotline. This advancement allowed us to improve the classification, traceability, and monitoring of reports related to potential human rights violations, complementing other existing mechanisms such as the Workplace Relations Committee, Human Resources channels, and the workplace environment suggestion box.

Compliance with our human rights standards is monitored through an integrated approach that combines the monitoring of action plans, the functioning of internal committees, the analysis of reporting channels, and the verification of compliance with applicable policies and procedures, ensuring confidentiality and non-retaliation.

Progress, Challenges, and Opportunities

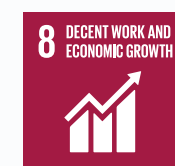
In 2025, significant progress was made in institutionalizing the human rights approach, particularly in consolidating the due diligence system and integrating the issue into corporate governance processes.



At the same time, we identified challenges related to deepening management throughout the value chain and strengthening impact measurement. These opportunities will guide our next steps as we continue to move toward management that is increasingly preventive, traceable, and aligned with international best practices.



Occupational Safety and Health



SDG 3.8; 8.8
|GRI 403-1; 403-2; 403-3; 403-4; 403-5;
403-6; 403-7; 403-8; 403-9; 403-10|
|BdO-10; BdO-11; BdO-12|

At Banco de Occidente, we understand that **protecting employee health, safety and well-being is a fundamental pillar of business sustainability**. Therefore, we promote safe, healthy, and supportive work environments that foster the physical, mental, and social well-being of our employees, as well as the continuity of our operations and the fulfillment of our responsibilities as an employer.

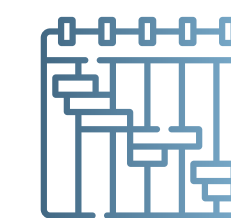
Based on this vision, we comprehensively manage Occupational Safety and Health (OSH) through a **preventive, risk-based and continuous improvement approach, which allows us to anticipate risks**, strengthen a **culture of prevention and risk awareness**, and respond in a timely manner to challenges related to the health, safety, and mobility of the people who are part of our organization. This approach is supported by the systematic monitoring of performance indicators that, in addition to guiding internal decision-making, underpin the reporting of our progress in international benchmarks such as the **Dow Jones Sustainability Index (DJSI)**, contributing to management that is increasingly robust, transparent, and aligned with industry best practices.

We have protocols for **emergency prevention and response**, as well as **periodic internal inspections and audit processes—both internal and external**—conducted in accordance with national and international standards and regulations. These audits allow us to verify compliance with the requirements of the Occupational Health and Safety Management System (SG-SST), identify opportunities for improvement, and continuously strengthen our practices. Based on the monitoring of key indicators and the results of these evaluation exercises, we guide the implementation of corrective and improvement actions, ensuring OSH management that is consistent with our sustainability strategy and with the well-being of the people and communities with whom we interact.

Our Occupational Health and Safety OHS programs

The Occupational Health and Safety department is responsible for developing, managing, and strengthening the **Occupational Health and Safety Management System (SG-SST)** through planning, implementation, monitoring, and continuous improvement, in compliance with Law 1562 of 2012, the Single Regulatory Decree for the Labor Sector 1072 of 2015, and Resolution 0312 of 2019. This system guides our decisions and practices to protect the health, safety and well-being of our employees, contractors, and other stakeholders involved in our operations.

Our OSH management is structured around different lines of action aimed at **preventing accidents, promoting health, and strengthening safe work environments**:



System planning and management

- Definition of the OSH management system's policy, objectives, and indicators.
- Development and implementation of annual work plans.



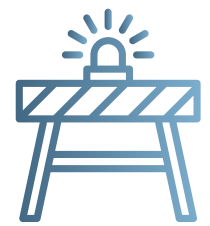
Prevention and health care

- Epidemiological surveillance systems for psychosocial risk factors and musculoskeletal disorders.
- Occupational medicine, return-to-work, and rehabilitation programs.
- Program for the protection of pregnant women and support for breastfeeding/lactation.



Safe Environments and Emergency Preparedness

- Occupational Safety and Health Programs.
- Preparedness and response to natural or technological emergencies.
- Public risk management.



Safe Mobility

- Implementation of the Strategic Road Safety Plan, aimed at reducing risks associated with commuting to work.



Responsible value chain

- Supplier and contractor management program, designed to ensure compliance with OSH guidelines and protect operational continuity.



Preventive culture and training

- Communication, training, and education plans in occupational safety and health, focused on self-care and prevention.

Key Achievements 2025

- ✓ **100% compliance** with hazard identification, risk assessment, and risk control at all locations.
- ✓ **100%** execution of the **safety inspection schedule**.
- ✓ **95% progress on occupational environmental measurements**, with a defined closure plan.
- ✓ **100%** of incident **investigations** completed.
- ✓ Continued **100% compliance with the minimum SG-SST standards**, with a rating awarded by ARL Alfa.
- ✓ Full coverage (**100%**) of **employees and contractors** in OSH programs.
- ✓ Over **700 hours** of OSH **training** provided during the year.
- ✓ **Controls implemented at 100%** of locations.

Challenges and Management Focus Areas for 2026

- Maintain **100% coverage** in hazard identification and risk assessment at all locations.
- Strengthen the **monitoring of occupational diseases**, increasing coverage from 60% to 100%.
- Increase **attendance and participation** in preventive activities.
- Expand training methodologies and incorporate new topics aligned with OSH.
- Maintain compliance with the **minimum standards of the OSH Management System (SG-SST)**.





Scope of the SG-SST

In 2025, we strengthened the implementation of the Occupational Safety and Health Management System (SG-SST), ensuring 100% comprehensive coverage for all individuals associated with our operations, regardless of employment status or work arrangement—whether on-site, remote, hybrid, or on assignment. The system covered all 7,054 of our direct employees, as well as 37 contractors and third-party workers whose work or place of service provision is controlled by the Organization, ensuring in all cases the application of the defined OSH standards and controls.

The OSHMS was implemented across all of the Bank's offices and workplaces, ensuring the consistent application of programs, controls, and actions

aimed at preventing workplace accidents and occupational diseases. Similarly, its scope was extended to contractors and suppliers with personnel on assignment who carry out activities within our facilities, to whom we provide guidelines, support, and verification of compliance with occupational safety and health requirements.

During the period under review, no employees, activities, or workplaces were identified as being excluded from the OSHMS. In cases where operations are carried out through third parties, we apply the coordination and control mechanisms defined by current regulations to ensure compliance with minimum OSH standards.

OSH Policy

At Banco de Occidente, we promote a culture of care, prevention, and shared responsibility regarding Occupational Safety and Health, in which open dialogue and active participation are fundamental to risk management. Our policy guides decisions and practices aimed at protecting the life, health, and well-being of those who are part of our operations, as well as contractors and associated third parties.

In line with this approach, we ensure work environments where employees can identify, report, and warn about unsafe conditions in a timely manner, with the assurance that there will be no retaliation or negative consequences for doing so. Likewise, we guarantee the right to withdraw from situations that pose an imminent risk, always prioritizing the protection of physical and mental well-being.

Employee Participation and OSH Committees

At Banco de Occidente, we promote an Occupational Health and Safety management approach based on participation, ongoing consultation, and open communication with our employees. We believe that early risk identification, incident prevention, and continuous improvement of the OHSMS are strengthened when the people who are part of the operation participate in an informed and co-responsible manner in its development, implementation, and evaluation.

This approach is realized through formal participation forums, accessible reporting channels, and joint committees that allow us to gather proposals, address concerns, and make decisions aimed at protecting life, health, and well-being in the workplace.

Mechanisms for Participation and Oversight in Occupational Safety and Health

Our employees have access to various mechanisms that enable active participation in the management and continuous improvement of the OSH Management System and access relevant information regarding occupational safety and health, including:

- **Participation in formal committees**, where risks are analyzed, preventive actions are proposed, and improvement plans are monitored.
- **Channels for reporting unsafe conditions, unsafe acts and incidents**, as well as suggestions for

This framework **strengthens incident prevention, drives continuous improvement of the Occupational Health and Safety Management System, and consolidates an organizational culture based on trust, transparency, and self-care as pillars of the Bank's well-being and sustainability.**





improvement, which enable timely and preventive risk management. To this end, we actively manage the dedicated OSH reporting mailbox (saludytrabajo@bancodeoccidente.com.co).

- **Training and awareness-raising sessions** aimed at strengthening a culture of risk awareness, self-care, prevention, and emergency response.
- **Direct involvement of employees** in processes such as hazard identification, safety inspections, and the analysis of workstations and work processes.

These mechanisms ensure that OSHMS information is communicated clearly, promptly, and accessibly, and that decision-making is informed by employee experience and operational knowledge.

Occupational Safety and Health Committees and Dialogue Forums

Joint Occupational Safety and Health Committee (COPASST):

This is the primary formal joint health and safety committee ensuring worker participation and consultation, between employees and the employer to strengthen the OSHMS.

Composition and frequency:

- Elected every two years.
- Holds regular monthly meetings.
- Composed of equal numbers of employee and employer representatives.
- Each region (Cali, Bogotá, Barranquilla, and Medellín) has a committee composed of 8 primary employee representatives and their alternates, and 8 employer representatives with their respective alternates.

Key functions:

- Promote, disseminate, and support the activities of the SG-SST.
- Act as a worker-employer monitoring and consultation body for compliance with safety and health programs.
- Propose control measures and improvement plans for working conditions.
- Participate in training activities.
- Collaborate in the investigation of workplace accidents and follow up on action plans.
- Maintain an up-to-date archive of committee minutes and decisions.

Emergency Operations Committee (COE):

coordinates preparedness, response, and recovery in the event of emergencies or disasters.

Composition:

- Composed of leaders from departments with decision-making authority, including Administrative Resources, Human Resources, Bank Security, Occupational Safety and Health (OSH), and Operations.
- There is one committee for each building.

Strategic Role:

- Coordinate actions before, during, and after an emergency.
- Disseminate the Emergency Plan and Standard Operating Procedures (SOPs).
- Lead earthquake and evacuation drills nationwide.
- Ensure the necessary resources for implementing the Emergency Prevention, Preparedness, and Response Plan.
- Train its members in the Incident Command System.





Workplace Coexistence Committee (CCL):

promotes respectful work environments free from workplace harassment, strengthening employees' psychosocial well-being.

Composition and frequency:

- One committee per area.
- Composed of representatives from the employer and employees, including regular members and alternates.
- Two-year term.
- Regular meetings at least every three months.

Main functions:

- Receive and process complaints related to potential instances of workplace harassment.
- Analyze cases confidentially and objectively.
- Listen to the parties involved and facilitate opportunities for dialogue.

- Develop agreed-upon improvement plans.
- Monitor the commitments made and verify compliance.

Road Safety Committee:

leads the implementation and monitoring of the Bank's Strategic Road Safety Plan.

Responsibilities:

- Monitor and carry out preventive activities to reduce accidents.
- Develop training on traffic regulations and safe road behavior.
- Provide special support to employees in sales roles.
- Participate in the investigation of traffic incidents and in defining corrective actions.

Hazard identification, risk assessment, and continuous improvement

We conduct hazard identification and risk assessment on a regular basis at all our locations and workplaces through in-person or virtual exercises involving employees, area leaders, COPASST, and technical support from the Occupational Risk Management Company (ARL). This process allows us to anticipate, prevent, and control the risks associated with our activities, protecting the safety, health, and well-being of our employees, contractors, and other individuals involved in the operation.

This analysis comprehensively considers the processes, activities, and tasks carried out by the Organization, including:

- ✓ Routine and non-routine activities.
- ✓ In-house and subcontracted tasks.
- ✓ Different stages of service delivery.
- ✓ Operational conditions and geographic contexts where the operation takes place.

Based on this information, we periodically update the **hazard identification and risk assessment matrix**, which allows us to prioritize those scenarios with the highest level of exposure and potential impact.

Participation in hazard identification and risk assessment

Employee participation is also directly integrated into the technical processes of the SG-SST. During 2025:

- Employees actively participated in safety inspections at facilities and workstations.
- Process and job analyses were conducted, incorporating the experience of those performing the work.
- The annual update of risk identification, assessment, and control was strengthened, validating the effectiveness of the measures implemented.

OSH Risk Management and Application of Controls

Identified risks are managed by applying the hierarchy of controls, prioritizing hazard elimination and, when this is not possible, the implementation of controls at the source, in the environment, and for the worker, supplemented by administrative measures. This approach allows us to **effectively reduce the likelihood of workplace accidents and occupational illnesses, fostering safe and healthy work environments.**





In addition, we conduct **safety inspections** aimed at identifying unsafe conditions requiring priority intervention. These inspections are carried out according to prioritization criteria defined by the Organization, considering the risk level of the sites, the activities performed, and the results of previous assessments, and are supported by technical assistance from the ARL when necessary.

We use the results of hazard identification, risk assessment, inspections, and incident investigations to measure the **performance of our SG-SST**, in accordance with GTC 45 standards and complementary specialized methodologies. This process allows us to identify opportunities for improvement and implement preventive and corrective actions in a timely manner. Additionally, we share these findings with our employees, the COPASST, process leaders, and Senior Management, which strengthens informed decision-making and our commitment to continuous improvement.

Hazard Identification Methodology

In 2025, we maintained **full coverage in hazard identification and risk assessment processes**, ensuring the implementation of controls at **100%** of our sites. This result consolidates our preventive management and allows us to focus our 2026 efforts on strengthening the consistency and depth of risk analyses. This comprehensive approach is based on the systematic application of the following processes and tools:

- **Hazard identification and risk assessment** (GTC 45).
- **Psychosocial risk assessment.**
- **Biomechanical tools** (OCRA and RULA checklists).
- **Scheduled safety inspections.**
- **Analysis of workstations** and work processes.

Major occupational risks identified

In 2025, the main occupational hazards identified as having the potential to cause ailments and illnesses were **psychosocial and biomechanical risks**, which were primarily associated with diagnoses related to the **musculoskeletal system** and the **mental and behavioral health system**. These risks have been addressed as a priority through preventive measures, **epidemiological surveillance programs, and adjustments to working conditions**, aimed at mitigating their impact and strengthening the overall well-being of employees.

✓ **No incidents resulting in serious injuries** occurred in 2025.

The **identified risks** are managed by applying the **hierarchy of controls**, prioritizing preventive measures that reduce exposure and the likelihood of adverse events occurring:

- **Elimination of the hazard**, when technically feasible.
- **Substitution** with safer alternatives.
- **Engineering controls**, such as physical or environmental modifications.
- **Administrative controls**, including procedures, signage, and training.
- **Personal Protective Equipment (PPE)**, as a last line of defense.

This approach helps **foster safe and healthy work environments**, effectively reducing the risks associated with operations.



Prevention and protection of customers and third parties

Our preventive approach also extends to customers, suppliers, contractors, and visitors who interact with our facilities, through:

- Visible signage for hazards and traffic areas.
- Adaptation of physical spaces to prevent falls and other incidents.
- Procedures for responding to emergencies and physical security incidents.
- Continuous monitoring of reported unsafe conditions.

Accident and incident management and continuous improvement in OSH

At Banco de Occidente, we manage workplace accidents and incidents with a **preventive and continuous improvement** approach, focused on **identifying root causes, strengthening existing controls, and preventing the recurrence** of events. Each incident is analyzed to identify root causes and prevent recurrence, and as an opportunity to reinforce the culture of self-care, risk management, and comprehensive protection of our employees, contractors, and third parties.

Accident and Incident Investigation Process

All reported workplace accidents and incidents are investigated in accordance with the SG-SST guidelines, following a structured process that includes:

1. Composition of the Investigation Team

Composed of the immediate supervisor, a representative from COPASST, and the Occupational Safety and Health team. In serious or fatal incidents, a licensed OSH professional and specialized technical staff participate.

2. Information gathering

This is conducted in person or virtually, depending on the severity of the incident, using ICT tools. The investigation is carried out within fifteen (15) days of the incident.

3. Root cause analysis

Immediate and underlying causes are identified using the cause tree methodology, in accordance with NTC 3701.

4. Definition of Corrective and Preventive Actions

A prioritized action plan is developed, applying the hierarchy of controls to eliminate or mitigate the identified risks.

5. Documentation and dissemination of lessons learned

Reports are documented, approved, and shared with the relevant departments to prevent the recurrence of similar incidents.

6. Follow-up and verification

The completion of actions and their effectiveness over time are monitored.



Trends in OSH indicators

To analyze OSH performance over time, we track the **evolution of workplace accidents, the accident rate, and occupational illness incidents** during the 2022—2025 period. This analysis allows us to identify trends, evaluate the effectiveness of implemented preventive measures, and guide decision-making for the continuous strengthening of OSH management.

Work-Related Injuries

2025			2024			2023			2022		
Employees	Contractors	Total	Partners	Contractors	Total	Partners	Contractors	Total	Partners	Contractors	Total
3,0	0,0	3,0	4,1	0,0	4,1	2,4	0,0	2,4	3,7	4,2	3,7

Work-related injuries: (Reportable work-related accidents/HHT)
*1.000.000
HHT employees: 13.825.840

Contractor man-hours: 111.960
Total man-hours: 13.882.272.

The trend in the accident rate between 2022 and 2025 shows variable behavior, with a **significant decrease in 2025**, when the rate stood at **3,0**, compared to **4,1 in 2024**. This result reflects an improvement in the Bank’s preventive performance, associated with the strengthening of operational controls, awareness-raising initiatives, and ongoing monitoring of risks identified at locations and in processes.

For **direct employees**, the rate fell from **4,1 in 2024 to 3,0 in 2025**, indicating a reduction in the occurrence of workplace accidents relative to exposure measured in man-hours worked. This positive trend occurs

within a context of high SG-SST coverage and the systematic implementation of preventive measures, such as safety inspections, training, and monitoring unsafe conditions.

Meanwhile, the **accident rate among contractors remained at 0,0 throughout the 2023—2025 period**, reflecting adequate risk management in outsourced activities and compliance with occupational safety and health guidelines required of suppliers and contractors carrying out activities under the Bank’s control.



At the consolidated level, the reduction in the total rate in 2025 confirms the effectiveness of the prevention strategies implemented and reinforces the importance of continuing to deepen root cause analysis, strengthening the culture of self-care, and implementing differentiated risk management, to sustain and improve this performance in the coming periods.

Accident Severity Index (ASI)

2025			2024			2023			2022		
Contractors	Contractors	Total	Partners	Contractors	Total	Partners	Contractors	Total	Partners	Contractors	Total
1,67	0	1,67	3,80	0	3,78	4,45	0	4,43	1,92	0	1,90

ISA Formula: (Days of disability due to work-related accidents / HHT) * 100
HHT employees: 13.825.840

Contractor HHT: 111.960
Total HHT: 13.882.272

The Accident Severity Index (ISA) shows a **sustained decline** since the peak recorded in 2023, reflecting improvements in occupational safety and health management. In 2025, the total indicator stood at **1,67**, showing a significant decrease compared to 2024 (3,78) and 2023 (4,43). Severity is concentrated among direct employees, while it remains at **zero** for contractors, suggesting effective control of serious incidents and the effectiveness of the preventive measures implemented.



Accident Frequency Rate (AFR)

2025			2024			2023			2022		
Total	Contractors	Partners	Total	Contractors	Partners	Total	Contractors	Partners	Total	Contractors	Employees
0,60	0,00	0,60	0,81	0,00	0,81	0,47	0,00	0,47	0,73	2,17	0,72

IFA Formula: (Workplace accidents/HHT) *100
HHT employees: 13.825.840

Contractor FTE: 111.960
Total HHT: 13.882.272



The Accident Frequency Index (AFI) in **2025** stood at **0,60**, showing a **decrease compared to 2024**, when the indicator reached **0,81**. This result reflects a lower incidence of workplace accidents per 100 workers, which is consistent with the strengthening of preventive measures, awareness campaigns, and ongoing monitoring of prioritized risk factors within the Occupational Health and Safety Management System (SG-SST).

For **direct employees**, the IFA fell from **0,81 in 2024 to 0,60 in 2025**, consolidating a positive trend compared to previous years and showing a **reduction in the frequency of accidents**. This performance reflects more effective risk management, particularly in administrative and operational activities where controls, training, and a culture of self-care have been strengthened.

For **contractors**, the index remained at **0,00 during 2025**, indicating that no workplace accidents were recorded among the outsourced workforce. This result is consistent with the controls established for suppliers and contractors, as well as with the induction, verification, and monitoring processes regarding occupational safety and health.

Absenteeism Rate

2025			2024			2023			2022		
Total	Contractors	Partners	Total	Contractors	Partners	Total	Contractors	Partners	Total	Contractors	Employees
14,35	86,18	14,26	13,66	76,42	14,30	13,20	34,96	13,16	13,44	25,61	13,42

Absenteeism: [Number of days absent during the accounting period / Total number of scheduled workdays during the accounting period] × 100.

HHT employees: 13.825.840
Contractor HHT: 111.960
Total HHT: 13.882.272.



The absenteeism rate remained **stable and within controlled levels** during the 2022—2025 period, with consistent levels among direct employees (between 13,16 and 14,30) and greater volatility among contractors, explained by the operational and temporary nature of their activities. In 2025, the total rate stood at 14,35, in line with the **corporate target of 14,29%**, demonstrating effective management of working conditions, health, and well-being, as well as effective monitoring of absenteeism at the organizational level.



Key Results on Accidents and Occupational Illnesses in 2025

The results obtained in 2025 reflect consistent performance in OSH management, evidenced by the reduction in the accident rate compared to the previous year and the absence of incidents with serious consequences or fatalities. These indicators confirm the effectiveness of the controls implemented and reinforce the importance of continuing to strengthen preventive actions, early risk identification, and the promotion of a culture of self-care as pillars for maintaining safe and healthy work environments.

Our **occupational health services** cover all Bank employees and third-party workers under the Organization's operational control. These services are integrated into the SG-SST and focus on **prevention, clinical follow-up, and occupational rehabilitation**, contributing to safe and healthy work environments.

- **42 workplace accidents** recorded.
- **Accident rate:** 3,0.
- **Fatality rate:** 0
- **6 classified occupational illnesses.**
- **0 fatalities** due to workplace accidents or occupational diseases.
- **0 incidents with serious consequences (AT-GC).**
- **Major work-related injuries** due to blows and trauma.
- **Occupational health and well-being in our work environment**

Key occupational health services and programs

Our occupational health services are delivered through a comprehensive approach that allows us to anticipate risks, reduce the severity of health events, and strengthen the Bank's preventive capacity. This approach is implemented through the following strategic activities:

- ✓ **Comprehensive rehabilitation program**, with monitoring and support for employees with health conditions that result in prolonged disabilities (longer than 30 days) or work restrictions.
- ✓ **Periodic occupational medical examinations**, administered to the entire employee population, in accordance with identified risks.
- ✓ **Annual health assessment**, which consolidates the main findings of occupational medical evaluations and guides the planning of preventive actions in occupational medicine.
- ✓ **Follow-up on special cases**, with the involvement of occupational health professionals to facilitate return-to-work and job adaptation processes.





Confidentiality and responsible use of health information

The quality of occupational health services is ensured through the participation of specialized occupational health professionals, led by an occupational physician, who is responsible for the custody and management of employees' clinical information.

To protect the confidentiality and appropriate use of personal health data:

- Clinical information is held exclusively by the Bank's occupational physician.
- Access to the information is limited to the Occupational Safety and Health team (physician, psychologist, physical therapist, or occupational therapist).
- Any use of the information is made with the employee's informed consent, following a clear explanation of its scope and purpose.
- Confidentiality agreements are in place with healthcare providers who support evaluations and interventions nationwide.

Under no circumstances is health information used to grant favorable or unfavorable treatment, nor is it shared with other areas of the Bank, including Human Resources, ensuring ethical and responsible handling in accordance with current regulations.

Health and Well-being Performance

- **104% of medical evaluations** completed, exceeding the established minimum target (95%).
- Occupational disease monitoring: **60%** (basis for strengthening by 2026).
- **100% of cases with health condition assessments**, strengthening early risk detection and timely support.
- **100% implementation of promotion and prevention** programs.

Occupational health results demonstrate a **high level of compliance with preventive activities**, as well as opportunities for improvement in occupational disease control, which will become a priority focus for 2026.

Training for care and prevention

At Banco de Occidente, we view training as a cornerstone of **risk prevention, the promotion of self-care, and the fostering of a culture of occupational safety and health**. Through ongoing training programs, we strive to ensure that our **employees, suppliers, and contractors** have the knowledge and skills necessary to perform their duties safely and responsibly.

Our **OSH training strategy** is designed to meet the needs of different stakeholders, considering the risks associated with each role, activity, and work environment. This approach allows us to ensure comprehensive and consistent coverage nationwide.

Training is delivered through in-person, virtual, and hands-on sessions and includes the following processes:

- Induction and periodic refresher training on the OSH Management System.
- General and specialized training based on the level of risk exposure.
- Mandatory and voluntary training, in accordance with regulations and internal guidelines.





In 2025, we implemented a **broad portfolio of training initiatives**, structured around the following training areas:

General training in the OHSMS

- Orientation and refresher training in OHSMS for the entire Bank workforce.
- Orientation and refresher training in SG-SST for suppliers and contractors, depending on the nature of the service.
- Training on OSH legislation and hazard and risk identification.

Role-specific training

- 50- and 20-hour SG-SST courses for OSH managers and leaders by area.
- Training for COPASST on accident investigation and analysis.
- Training for the Workplace Coexistence Committee on coexistence, balance, and resilience.
- Training for the Emergency Operations Committee (COE) on functions, responsibilities, and early warning.

Emergency preparedness and response

- Training and preparation of emergency response teams at the national level.
- Training in first aid, CPR, OVACE, emergency management, and evacuation.
- Dissemination of the emergency plan in buildings, offices, and warehouses.

Training on specific risks

- Training in safe work at heights for specific areas.
- Training in the use of Personal Protective Equipment (PPE).
- Safe handling of chemicals and reading safety data sheets.
- Public safety training for priority offices.

Road safety and safe mobility

- Training on safe speed, fatigue prevention, and distraction prevention.
- Zero tolerance for driving under the influence of alcohol or drugs.
- Protection of vulnerable road users.

Health, ergonomics, and well-being

- Training on active breaks and proper posture for administrative staff.
- Annual virtual training on active breaks for self-employed and office workers.
- Educational activities during Health Week, focused on healthy lifestyle habits.

Training coverage and results in 2025

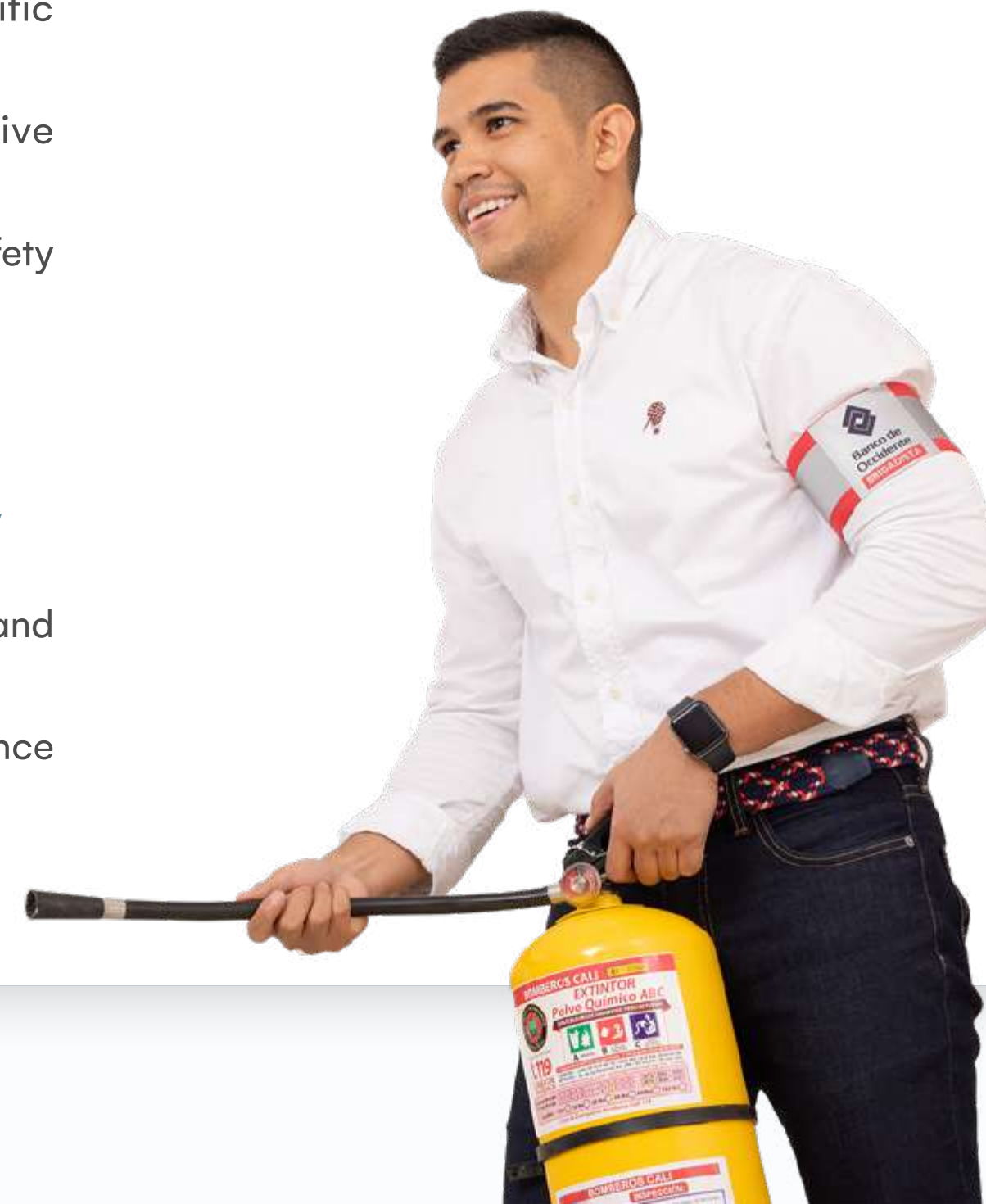
These results demonstrate the program's reach and its contribution to strengthening preventive capabilities across the entire operation.

Direct employees

- **471 OHS training activities.**
- **5,393 hours of training** provided.
- **7,054 employees** trained.
- The activity with the widest reach impacted **6,549 workers.**

Suppliers and contractors

- **63 OHS training sessions.**
- **707 people** trained.
- **Average of 1 hour** of training per contractor.





Goals, performance, and challenges

In 2025, we achieved **100% compliance with scheduled training sessions**, as well as full coverage of employees and contractors, establishing training as a key pillar of the OSH Management System.

Looking ahead to 2026, the main challenge is to **expand training methodologies and incorporate new content aligned with evolving OSH risks**, strengthening more participatory formats and learning experiences that increase the impact and ownership of the content.

Promotion of Health and Holistic Well-being

At the Bank, we promote a holistic well-being approach that recognizes health as an essential component of quality of life, productivity, and organizational sustainability. **Beyond occupational risk prevention**, we facilitate timely access to health services and develop **voluntary programs aimed at strengthening healthy lifestyle habits, disease prevention, and self-care among our employees**.

Access to non-work-related health services

We ensure that all employees have timely access to **medical and healthcare services not directly associated with their work**. To this end, we grant the necessary leave and time to attend medical appointments, exams, and procedures, in accordance with each individual's schedule, regardless of whether these services are provided through:

- La Entidad Promotora de Salud (EPS).
- Planes complementarios o medicina prepagada.
- Pólizas de salud contratadas de manera independiente.

Voluntary health promotion programs: As part of our commitment to prevention and well-being, we develop voluntary programs aimed at mitigating significant non-work-related health risks and promoting healthy lifestyles throughout the Organization:

Occupational Safety and Health Day: We hold an annual nationwide company-wide event focused on:

- Health promotion and self-care.
- Healthy eating.
- Prevention of common diseases.
- Healthy lifestyle habits.

The most recent edition took place in September 2025, featuring educational and experiential activities open to all.

Blood donation drives: We organize voluntary blood donation drives at our facilities in coordination with authorized healthcare providers, who supply medical staff, equipment, and safe conditions for blood collection and storage, thereby promoting solidarity and public health.

Executive Health Screening Program: aimed at employees in Senior Management, Middle Management, and Department Heads, this program seeks to strengthen the early detection of health risks through:

- Routine and specialized laboratory tests.
- Medical evaluations by specialists.
- Professional guidance for interpreting results.

Nutrition Challenge: a program designed for employees who are overweight or obese, focused on:

- Professional nutrition counseling.
- Education on balanced eating.
- Regular progress monitoring.
- Improved well-being and quality of life.

In 2025, we achieved high levels of compliance in health promotion activities, including the implementation of **company-wide health days, preventive programs, and medical evaluations**, establishing these initiatives as a pillar of organizational well-being.

Looking ahead to 2026, the main challenge is to **increase employee attendance and engagement in preventive activities**, strengthening communication and participation strategies that expand the impact of health and wellness programs.





Memorable Customer Experience



| SDG 9.3 |

At Banco de Occidente, the customer experience is a key driver of economic, business, and social development in the regions where we operate. Therefore, throughout 2025, we continued to strengthen a comprehensive approach to the customer experience, which integrates regional proximity, financial inclusion, service continuity, financial education, and technological innovation as pillars for generating long-term sustainable value.

In an environment marked by digital transformation, the constant evolution of user expectations, and the operational challenges inherent to the financial sector, the Bank made progress in consolidating a customer-centric experience. This approach is geared not only toward the efficient provision of financial products and services but also toward continuous advisory support for informed decision-making, the protection of financial consumer rights, and the strengthening of relationships based on trust.

During the reporting period, the banking correspondent network was consolidated as a key

access channel for facilitating access to financial services in areas without a physical branch presence and for improving the experience of both banked and unbanked customers. Through this channel, the Bank strengthened its presence in terms of service points and recorded sustained growth in transaction volume, consolidating its role as a financial partner for communities, businesses, and microentrepreneurs.



Expansion of territorial coverage

OXXO: 500 service points.

Farmatodo: 18 service points.

GANÁ: 3.000 service points.

Punto de Pago: 1.000 service points.

Collectively, the banking correspondent network enabled us to establish a presence in 350 municipalities across the country, as well as processed 10.000 third party payments through banking correspondents, totaling COP 5,6 billion.

In addition, we made progress in implementing technological solutions aimed at ensuring service continuity and operational resilience, as well as in strengthening support, training, and specialized advisory initiatives targeted at different customer segments. These actions helped promote the informed use of financial products and services, foster innovation, and contribute to the generation of economic and social value.

Banco de Occidente's customer experience approach is also grounded in principles of inclusion, accessibility, and fair and non-discriminatory treatment, ensuring that all customers, regardless of gender, socioeconomic status, disability or other vulnerable conditions, can access financial services equitably, with dignity, and in a timely manner. In this regard, experience management is aligned with the Financial Consumer Service System (SAC), current regulatory guidelines, internal risk assessment and management models, and the Credit Process Manual—General Credit Risk Policies MAN-COL-198—where customers are evaluated using the CAMEL Model, which consists of measuring and analyzing five fundamental parameters: capital (C), asset quality (A), management (M), earnings (E), and liquidity (L). This assessment is primarily used in the financial sector to measure corporate risk, and Banco de Occidente adapts it to analyze customers for the purpose of assigning credit limits. This maintains financial stability by granting loans based on repayment capacity.

Through this comprehensive approach, Banco de Occidente reaffirms its commitment to a customer experience that goes beyond the transaction, strengthens trust, promotes financial inclusion, and contributes to the sustainable development of individuals, businesses, and communities.



Our Commitment to Inclusion and Accessibility

Financial inclusion and accessibility are fundamental pillars of the customer experience at Banco de Occidente. Under this approach, throughout 2025 we continue to strengthen a comprehensive service model aimed at ensuring equitable, dignified, and timely access to our financial products and services, with a special emphasis on people with disabilities and groups in situations of greater vulnerability.

This model is managed in a coordinated manner through the **Financial Customer Service System (SAC)**, which establishes processes, guidelines, and monitoring mechanisms that ensure inclusive, respectful service centered on the specific needs of each customer, in accordance with current regulations and the principles of fair treatment promoted by the Bank.

As part of this approach, the Bank has a **specialized protocol for serving people with disabilities**, designed to ensure adequate, efficient, and respectful service delivery across all service channels. This protocol guides employees on how to interact appropriately with customers who have hearing, visual, or physical disabilities or other conditions, promoting clear, empathetic, and effective communication.

In addition, the Bank offers a **Colombian Sign Language interpretation service**, provided by a specialized vendor, with coverage at **100% of its physical branches**. This service facilitates interaction with people with hearing impairments, ensuring timely and equal access to information, and the proper delivery of financial services.

In terms of infrastructure, by 2025, **100% of the Bank's branches** had Braille signage indicating operating hours, while **99%** had physical accessibility features, such as ramps, stair lifts, or level entrances, enabling customers to access services safely and independently.

In addition, the Bank makes **contracts** available to people with visual impairments in **audio format**, accessible digitally, to promote understanding of contractual information and the informed exercise of their rights as financial consumers. Similarly, **subtitles** were added to **financial education audiovisual content** published on institutional websites and channels, strengthening access to information and inclusive learning.

The inclusive service model is reinforced by a nationwide **institutional policy on guide dog access**, which authorizes their entry into all Bank branches. This policy is uniformly communicated and applied across the network, in accordance with current regulations, ensuring equal conditions for guide dog users.

The Bank promotes an **organizational culture based on fair treatment, respect, and empathy** through the periodic dissemination of guidelines and practical recommendations for employees. These actions aim to strengthen quality, inclusive service that aligns with corporate values as well as customer expectations.

In addition, **compliance with inclusive service processes is monitored periodically**, providing support to the various service channels to ensure their proper implementation and the consistent delivery of accessible, high-quality service throughout the country.



With the aim of consolidating a culture centered on inclusion, in 2025 the Bank continued to develop training programs for its employees, designed to strengthen the skills necessary for the proper care of people with disabilities and other vulnerable groups.

Among the main training initiatives are:

✓ **An online course on serving people with disabilities**, which provides practical tools for assisting individuals with hearing, visual, and physical disabilities through clear guidelines, simulations of real-life situations, and best practices aimed at delivering an inclusive, respectful, and efficient service.

✓ **Online course on the Financial Consumer Service System (SAC) and the Financial Consumer Ombudsman (DCF)**, focused on strengthening knowledge regarding the protection of financial consumers' rights, with an emphasis on the most vulnerable populations.

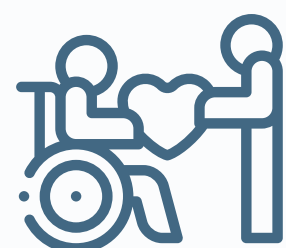
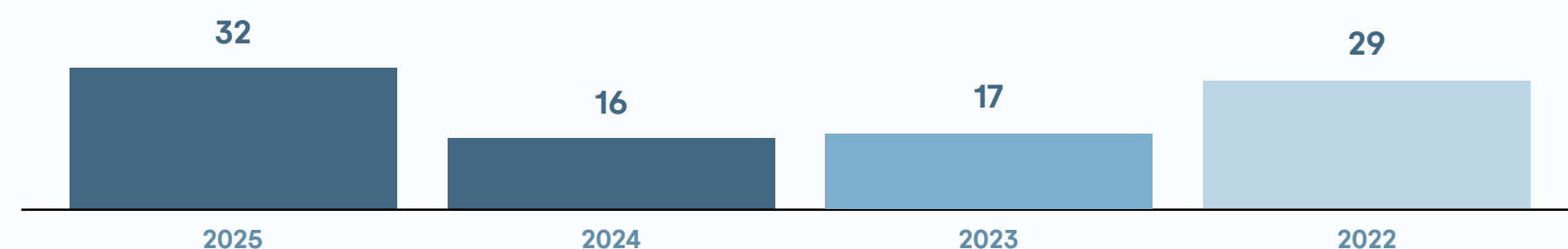
✓ **Basic sign language workshop**, available on the Bank's digital platform, aimed at improving communication with people with hearing impairments and raising employees' awareness of functional diversity.



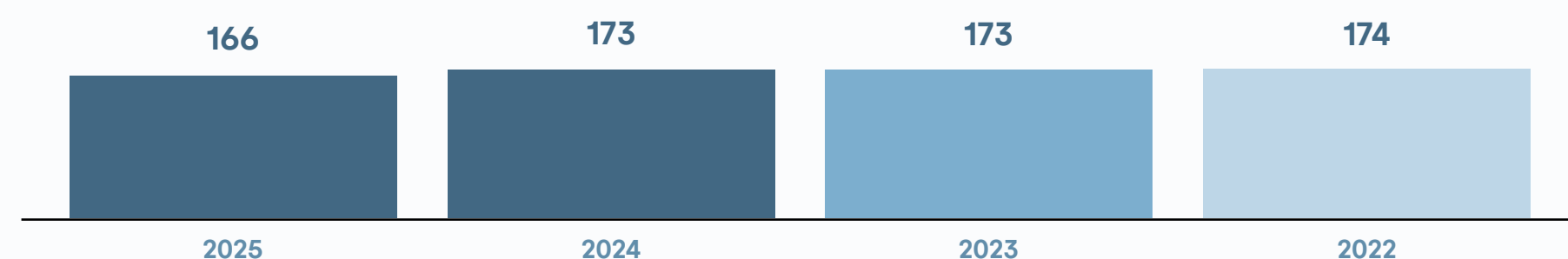
As a result of implementing this comprehensive approach, significant progress was made in 2025 in serving people with disabilities and in enhancing the accessibility of the Bank's network. The following table shows the evolution of the key indicators:



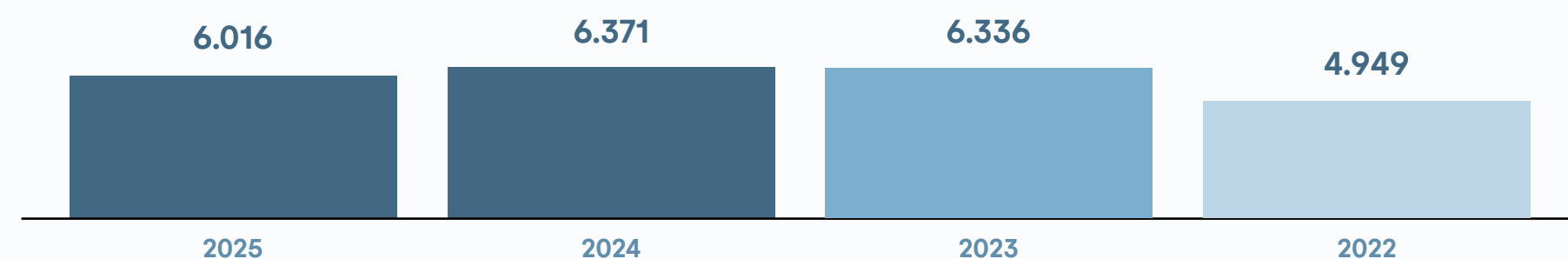
Customers with hearing impairments served



Branches with adapted accessibility



Employees trained in inclusive service



These results reflect Banco de Occidente's commitment to continuously improving the customer experience, eliminating barriers to access, and complying with **Law 1328 of 2009**, ensuring that all individuals, regardless of their circumstances, can access financial solutions equitably and with dignity.

Banking Correspondence:

In 2025, Banco de Occidente consolidated the **banking correspondent network** as one of the main enablers of the customer experience by strengthening proximity to users, expanding territorial coverage, and ensuring continuous access to financial services in areas where there is no physical branch presence. This channel is positioned as a strategic pillar for financial inclusion, operational continuity, and the generation of social and economic value in these regions.

As a result of the efforts made during the year, **transaction volume grew by 4,2%** compared to 2024, and the bank achieved **95% compliance with the strategic objectives defined for the channel**, demonstrating its relevance within the customer service model.

During the reporting period, the banking correspondent channel strengthened its contribution to financial inclusion by **expanding its territorial coverage** and integrating new networks of correspondents with significant national and regional impact. Learn more about the banking correspondent network at the following link.

In this context, the bank partnered with nationwide networks featuring high brand recognition and significant customer traffic, such as **OXXO**, with nearly **500 locations**, and **Farmatodo**, with **18 stores**, as well as strategic regional networks like **GANA** in Antioquia, which has approximately **3,000 locations** spread across all of the department's municipalities, establishing itself as one of the networks closest to local communities. Additionally, through the **Punto**

de Pago correspondent, the **CONRED** network was enabled, adding nearly **1,000 additional locations** to the Bank's network.

These integrations allowed the Bank to expand its presence to **more than 350 municipalities across the country**, benefiting both banked and unbanked customers, local businesses, microentrepreneurs, self-employed workers, and citizens in general, in both urban and rural areas.

Through its banking correspondent network, Banco de Occidente facilitated access to essential financial services, such as **payments for public and private utilities, PILA and tax payments, withdrawals, and deposits**, reducing geographic and economic barriers and promoting financial inclusion in historically underserved areas.

The Bank maintained the **standardization of transactional processes** to ensure that operations are easy for any user to understand and execute, regardless of their educational level or prior experience with financial services. This effort was complemented by **scheduled and organic communication campaigns on social media**, aimed at raising awareness of the correspondent network and educating users on how to conduct transactions safely and easily.

Additionally, **practical recommendations** on conducting transactions were developed and disseminated, facilitating access to clear, visual, and easy-to-understand information, which indirectly contributed to strengthening financial literacy and inclusion in the communities served.



The social impact of the banking correspondent channel is measured using indicators such as growth in transaction volume, territorial coverage, the availability of financial services in areas without bank branches, and effective access to financial resources by vulnerable populations.

In 2025, Banco de Occidente had approximately 175 branches nationwide, so banking correspondents played a fundamental role in the **distribution and payment of subsidies** targeted at high-risk populations, ensuring that funds reached communities in remote and hard-to-reach regions in a timely and secure manner. In this context, **more than 10,000 payments were made to third parties totaling approximately \$5,6 billion**, demonstrating the growing use of this channel for delivering funds to beneficiaries of social programs, business clients, SMEs, and public entities.

In addition, **special payment and collection days** were held at banking correspondents for large-scale agreements, facilitating compliance with civic obligations and reducing the need to travel to municipal capitals or intermediate cities.

This year, the Bank advanced the evolution of the banking correspondent channel toward a model with **greater added value**, progressively incorporating products and services that go beyond transactional execution.

Historically, **Payment Points** have been viewed primarily as collection points; in 2025, the bank—through marketing campaigns, training, coaching, and incentives—encouraged **operators** at these points to **develop sales skills for promoting and selling comprehensive accident insurance in partnership with SURA**.

As a result of these actions, **587 comprehensive accident insurance policies** were sold, facilitating access to low-cost financial protection products for populations such as security guards, motorists, informal self-employed workers, micro-entrepreneurs, and SMEs, who have traditionally been excluded from the insurance system.

In fulfillment of its contractual responsibility to the correspondent networks, a **national knowledge survey** was conducted in August 2025 among staff serving at the service points, with the aim of assessing the adoption of lessons taught in previous years and strengthening the quality of service provided to users.

This assessment involved **1,150 employees** nationwide and identified opportunities for improvement in user guidance, promotion of the channel's use, and service delivery. As part of the initiative, the five most outstanding participants were recognized with symbolic incentives, strengthening motivation and commitment to service quality.

Aware of the operational challenges associated with providing financial services in areas without a physical branch presence, during 2025 the Bank continued working on the development of technological solutions aimed at ensuring **uninterrupted service delivery** through banking correspondents.

In this context, progress was made on the **Stand-in** initiative, which, starting in February 2026, will allow customers to make payments and other transactions even in scenarios of operational unavailability, reducing the need for travel, strengthening service sustainability, and protecting the customer experience.

Additionally, innovations were implemented to improve the channel's efficiency, such as the **direct connection with Efecty for PILA collections, the launch of PowerPage for the digital filing of correspondent Mechanisms for Requests, Complaints, Claims, and Suggestions — PQRs**, and the technological integration of new networks through transactional platforms interoperable with Grupo Aval's infrastructure.

The performance of the banking correspondent channel is measured through key indicators such as transaction volume, territorial coverage, and digital banking penetration. In this regard, in 2025 the channel recorded an overall **4,2% increase in the number of transactions** compared to 2024, and the **adoption of the Dale! digital wallet through payment points grew by 15%**, driven by network expansion, the addition of new correspondent networks, and the diversification of services offered.

Taken together, these results reflect the positive impact of the banking correspondent network on the quality of life in the communities it serves, by ensuring continuous, accessible, and reliable access to financial, collection, and protection services, thereby strengthening financial inclusion, local economic stability, and user confidence in the financial system.





As part of its monitoring of the performance and reach of the banking correspondent channel, Banco de Occidente conducts periodic monitoring of **territorial coverage by department** to assess the evolution of the number of service points, identify regional trends, and guide strategic decisions related to the expansion, consolidation, or adjustment of the network.

During the 2023—2025 period, the channel showed significant expansion in strategic departments, particularly in areas with high population density and economic activity, as well as operational adjustments in some territories associated with network optimization, consolidation of service points, or market dynamics.

The following table shows the evolution of the number of banking correspondents by department:

Department	Change 2025 vs. 2024 (%)	2025	2024	2023
Amazonas	-3%	31	32	23
Antioquia	24%	7.012	5.635	2.065
Arauca	-17%	759	911	455
San Andrés, Providencia y Santa Catalina	-20%	136	170	109
Atlántico	-13%	3.843	4.413	3.224
Bogotá, D. C.	-13%	19.175	22.153	10.641
Bolívar	-30%	3.220	4.579	2.956
Boyacá	7%	2.717	2.532	1.527
Caldas	1%	1.762	1.746	1.261
Caquetá	-7%	1.069	1.145	732
Casanare	-24%	1.000	1.324	714
Cauca	-7%	1.603	1.719	1.414
Cesar	-28%	1.834	2.549	1.651
Chocó	-6%	408	432	326
Córdoba	-17%	1.885	2.280	1.742
Cundinamarca	-1%	5.726	5.764	3.177
Guainía	-31%	33	48	30
Guaviare	-39%	132	215	112
Huila	-2%	2.238	2.283	1.347
La Guajira	-11%	1.171	1.317	832
Magdalena	-5%	1.745	1.840	1.517
Meta	-17%	2.066	2.484	1.511
Nariño	-2%	1.842	1.879	1.323
Norte de Santander	-5%	3.625	3.805	2.468
Putumayo	-12%	386	441	244
Quindío	-1%	910	917	688
Risaralda	5%	1.535	1.466	956
Santander	1%	4.184	4.163	2.638
Sucre	-6%	1.683	1.790	1.230
Tolima	-2%	1.800	1.831	1.149
Valle del Cauca	-10%	7.190	7.972	5.749
Vaupes	-46%	30	56	28
Vichada	-38%	69	112	59

The results show **significant growth in strategic departments** such as Antioquia, Santander, Boyacá, and Risaralda, associated with the consolidation of regional networks such as **GANA** and the integration of high-impact agents. In contrast, the negative variations recorded in some departments are mainly due to **network optimization** processes, the elimination of locations with low transaction volumes, and operational adjustments, without affecting the effective coverage of the service.

Overall, the network's evolution enabled the Bank to maintain a **broad and diversified presence nationwide**, strengthening access to essential financial services in urban and rural areas, and consolidating the role of the banking correspondent network as a key channel for the customer experience, financial inclusion, and territorial development.



Customer Experience Awards – Recognizing Excellence



| SDG 9.3 |

At Banco de Occidente, we understand that a memorable customer experience is built on an **organizational culture centered on people**, collaborative work, and continuous improvement. In this regard, throughout 2025 we continued to strengthen the Customer **Experience Awards** as a key mechanism to recognize, highlight, and promote the initiatives, projects, and behaviors that generate a positive and tangible impact on the experience of our internal and external customers.

This initiative has established itself as a strategic tool to drive innovation, reinforce a culture of service, and align the efforts of the Bank's various departments around a common purpose: to deliver consistent, personalized, and high-value experiences at every customer touchpoint.



The Customer Experience Awards are held annually through a structured and transparent process that ensures the objective evaluation of the submitted initiatives. The call for entries is open to all areas of the Bank, inviting teams to submit projects implemented during the year that have significantly contributed to improving customer experience.

In the first stage, departments submit their initiatives, which are evaluated by a specialized team that analyzes their scope, impact, and alignment with the Bank's strategic objectives. Subsequently, the selected initiatives advance to an evaluation phase by a **judging panel**, which determines the winning projects based on pre-established criteria, such as impact on the customer experience, innovation, sustainability, and scalability.

In 2025, the awards were organized into **six categories**, each designed to recognize a key aspect of the transformation of customer experience:

- ✓ **Best Projects:** recognizes teams that implemented innovative solutions and transformed key moments in the customer journey, generating tangible impacts on the Bank's profitability and customer satisfaction.
- ✓ **Best ENSI (Internal Satisfaction Level):** highlights the areas that achieved the highest levels of internal customer satisfaction, demonstrating collaborative, accessible, and empathetic management.
- ✓ **WOW Branches:** rewards branches that stood out for their exceptional performance in customer service, based on satisfaction surveys, mystery shopper results, participation in customer experience campaigns, and the implementation of improvement plans.
- ✓ **WOW Employees:** recognizes employees who exceeded expectations in customer service, creating memorable experiences for customers and leaving a positive impression in every interaction.
- ✓ **Best Managers:** Honors sales managers with the highest levels of customer recommendation, highlighting their advice, support, and approachability.
- ✓ **Best Directors:** Recognizes the Fiduciaria's directors who stood out for their guidance, effective responses, consistent approachability, and sensitivity to client needs, as well as for their contribution to creating positive experiences and making strategic decisions.



Tangible Impact on the Customer Experience Awards

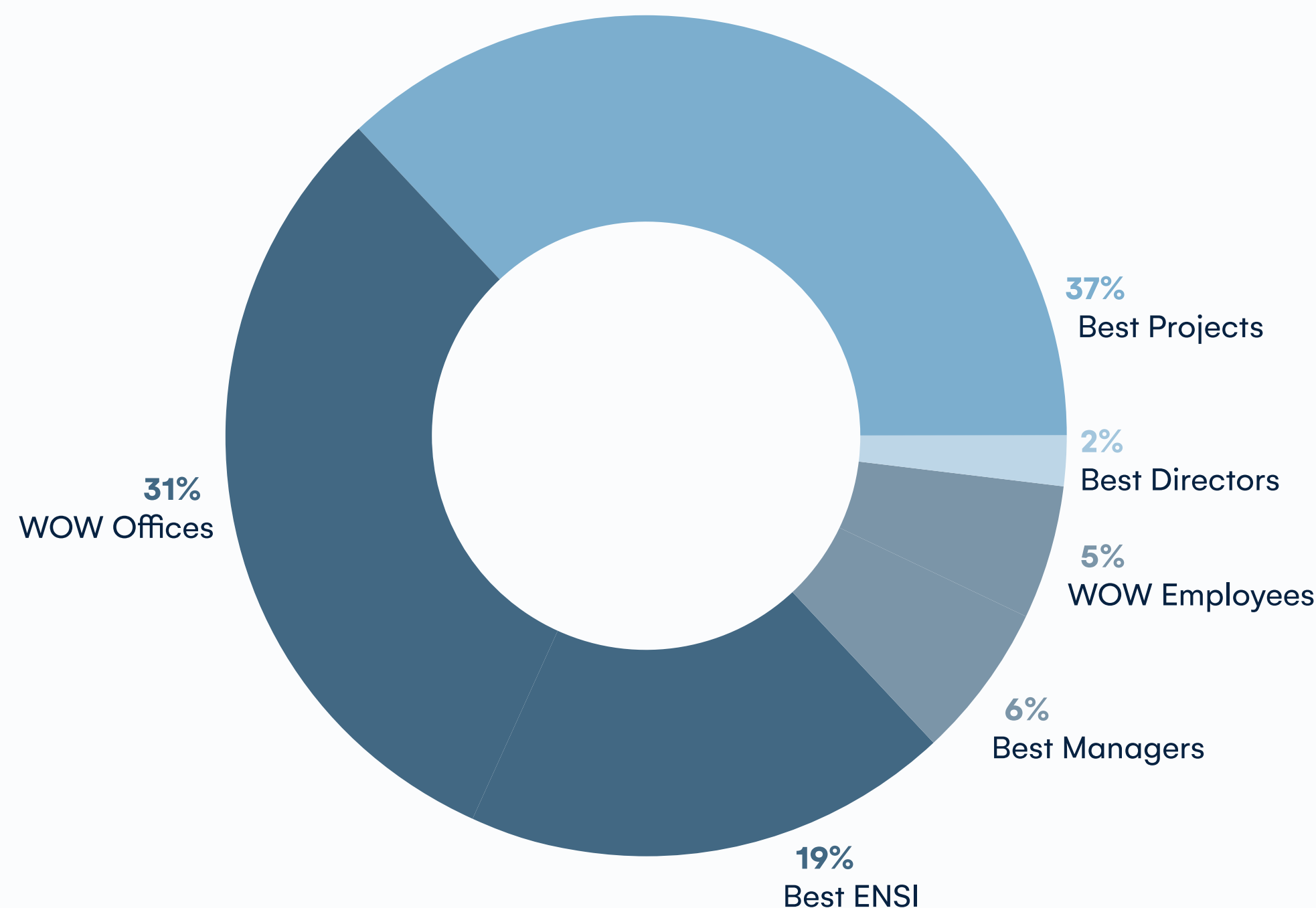
During the 2025 edition of the Customer Experience Awards, there was a high level of participation and commitment from the Bank's departments toward continuous improvement and the creation of customer-centric solutions.

In total, **82 projects were submitted** in the initial phase of the call for entries, of which **50 initiatives** advanced to a second evaluation stage and **39 projects** were analyzed by the judging panel. As a result of this rigorous process, **11 winning projects** were **awarded**, with particular emphasis on those having the greatest real impact on the customer experience.

Additionally, **80 awards** were granted across the various defined categories, reflecting the scope of the initiative and recognizing the work of teams, offices, and employees who contributed significantly to transforming the customer experience.

In 2025, **the total prize money amounted to \$44.400.000**, distributed among the different categories according to their impact and scope. The highest number of entries was in the **Best Projects** category, followed by **WOW Branches** and **Best ENSI**, which demonstrates the Bank's emphasis on initiatives with cross-cutting impact and on strengthening customer touchpoints.

Distribution of awards by category — 2025



As part of the event's closing, a **perception survey was conducted among participants**, whose results reflected a positive assessment of the Customer Experience Awards as a platform for recognition, motivation, and strengthening the culture of continuous improvement. The testimonials collected highlighted the value of recognizing ideas, teamwork, and the contribution of initiatives to the Bank's results.

"Congratulations, teams! It's great to know that here at the bank, ideas are rewarded"

"I think it's very fitting and touching"

"Everything was great; congratulations to the organizers"

"An excellent event that highlights the culture of continuous improvement"

"Thank you for recognizing the best!!"

"I'm very grateful for the nomination and for having been able to contribute to the Bank's results."

"Excellent event! Congratulations to the winners!"

"You really outdid yourselves; everyone's interaction was great. Congratulations to everyone—it was wonderful."

This initiative reaffirmed the importance of having spaces that promote innovation, organizational learning, and the consolidation of a customer-centric culture, in which employees recognize themselves as key players in creating memorable experiences.

Through the Customer Experience Awards, Banco de Occidente strengthens its commitment to service excellence, the recognition of internal talent, and the building of an organizational culture focused on continuous improvement, aligned with the Bank's strategic objectives and customer expectations.

Net Promoter Score (NPS)

| BdO-17 |

At Banco de Occidente, measuring customer experience is a fundamental pillar of management, organizational learning, and strategic decision-making. In 2025, we strengthened our measurement and active listening model to gain a deeper understanding of customers’ perceptions of our products, services, and channels, identify opportunities for improvement, and guide segment-specific actions.

We measure customer experience using quantitative indicators, standardized methodologies, and specialized tools, which allow us to consistently evaluate changes in satisfaction, recommendation, and the key factors that influence customers’ relationships with the Bank.

In 2025, Banco de Occidente’s Net Promoter Score (NPS) stood at 64%, representing a 4–percentage-point decrease from 2024 (68%), in a challenging environment for the financial sector characterized by regulatory changes, increased competition, and rising customer expectations.

Despite this change, the indicator remained at favorable levels and allowed for the identification of specific improvement opportunities by segment, which guide the actions defined for the coming periods.

Indicator	2025 Target	2025	2024	2023	2022	2021
Satisfaction rating (%)	70	64	68	67	68	68
Data coverage (%)	0,55	0,61	0,46	0,40	0,54	0,63

These results show that, although the satisfaction level varied from the target set for the year, **data coverage increased** in 2025, rising from 0,46 in 2024 to **0,61**, reflecting an improvement in the representativeness of the measurement and in the quality of the information collected.

Indicator	2025 Target	2025	2024	2023	2022	2021
NPS for Businesses (%)	76	69	74	72	73	72
NPS People (%)	51	47	45	46	50	47

In the **Corporate Banking** segment, the NPS reached **69%** in 2025; the indicator remained at solid levels, reflecting a positive perception among corporate clients regarding the support, advice, and solutions offered by the Bank.

Meanwhile, in **Retail Banking**, the NPS stood at **47%**, showing a **2–percentage–point** change from the previous year. This result helped identify opportunities for improvement aimed at strengthening recommendations, particularly in areas related to response times, process clarity, and proactive communication.

With the aim of deepening its understanding of customer perception, in 2025 the Bank consolidated an **active listening model** through the implementation of the **Qualtrics Voice of the Customer (VoC)** tool. This model operates with samples defined according to statistical criteria that guarantee representativeness and a margin of error of **5%** or less.

The methodology used is endorsed by **IZO**, an international provider specializing in quantitative customer experience measurements, which supports the reliability and consistency of the results obtained.

Analysis of the collected data allowed us to classify customers into three main groups—**promoters, passives, and detractors**—and identify the factors that influence their perception:

- 

✓ **Promoters:** They particularly value personalized service, prompt resolution of requests, and the ease of use of the digital portfolio and transactional channels.
- 

✓ **Passive customers:** identify opportunities for improvement related to response times in after-sales service, the clarity of processes, and more proactive communication regarding changes and updates.
- 

✓ **Detractors:** highlight friction associated with more complex processes, such as product applications, complaint management, and the need for better integration between channels, as well as the reduction of repetitive procedures.

The results of the satisfaction survey and the NPS serve as a key input for Banco de Occidente’s decision-making. Throughout 2025, these findings enabled the prioritization of actions aimed at enhancing the customer experience in a differentiated manner by segment, channel, and type of interaction.



Although some goals were not fully achieved, the **stability of the indicators**, the increase in survey coverage, and progress in key segments demonstrate the positive impact of the implemented strategies. In this regard, the Bank set a target for 2026 to move toward an **NPS of 68%**, through:

- ✓ Strengthening an organizational culture with a customer-centric vision.
- ✓ Prioritizing high-value actions aimed at the main expectations and pain points identified.
- ✓ Intensive use of data and artificial intelligence for personalized customer management and the anticipation of needs.

Through this approach, Banco de Occidente reaffirms its commitment to rigorously measuring customer experience, transparency in results, and the implementation of continuous improvement actions that strengthen trust and long-term relationships with its customers.

Mechanisms for Requests, Complaints, Claims, and Suggestions — PQRS

At Banco de Occidente, handling **Requests, Complaints, Claims, and Suggestions (PQRS)** is a fundamental component of customer experience and a key mechanism for strengthening trust, transparency, and the continuous improvement of the Bank's processes and services. Through the Financial Consumer Service System (SAC), the Bank ensures timely, traceable, and effective handling of requests submitted by customers through various channels.

In 2025, the Bank continued to strengthen the management of PQRS as part of its commitment to quality, customer-centric service aligned with current regulations on financial consumer protection. This approach allows the Bank not only to resolve customer requests but also to identify opportunities for improvement in products, processes, and service channels.

Throughout the year, **244.855 PQR requests** were received, **100% of which were resolved**, corresponding to a 100% resolution rate.

Breaking down the data by type of request, 219.401 inquiries were handled, there were 0 claims, and 25.454 complaints, of which, as mentioned above, 100% were resolved satisfactorily.

These results reflect the Bank's efforts to ensure clear, timely, and consistent responses to customers, in accordance with the timeframes and guidelines established by applicable regulations and the Customer Service Center (SAC).

The information derived from PQRS management is analyzed periodically to identify trends, recurring causes, and opportunities for improvement in customer experience. This analysis allows for providing feedback to the responsible departments, strengthening internal controls, and prioritizing actions aimed at preventing the recurrence of situations that could affect customer satisfaction.

Additionally, PQRS management is integrated with other mechanisms for measuring customer experience, such as the **Net Promoter Score (NPS) and the active listening model**, providing a comprehensive view of customers' expectations, perceptions, and main pain points in their relationship with the Bank.

In 2025, the Bank made progress in strengthening the channels and tools available for PQRS management, with the aim of facilitating customer access to these mechanisms and improving service efficiency. Notable among these actions is the implementation of digital solutions that promote self-service, the traceability of requests, and reduced response times, in line with the strategy for digital transformation and improving customer experience.

PQRS management is also conceived as a strategic input for decision-making, continuous improvement, and the consolidation of a customer-centric culture, in which the voice of the financial consumer is a key element for strengthening trust and long-term relationships.





Training Excellence in Customer Experience



| SASB FN-CB-240a.4 | SDG 4 y 8|

At Banco de Occidente, we understand that a positive and sustainable customer experience is built not only on service quality but also on **capacity building, access to knowledge, and informed decision-making**. Therefore, in 2025 we continue to promote a comprehensive strategy for financial training and education aimed at different customer segments, with the goal of supporting their development, strengthening their competitiveness, and consolidating long-term relationships based on trust and shared value.

This strategy is designed to address the specific needs of each segment—corporate banking, government, businesses, SMEs, and individuals—through specialized training programs, relevant content, and technical support frameworks that help improve customer experience and enhance the economic and social impact of their activities.

Corporate Banking Training

In 2025, Banco de Occidente expanded and deepened its training programs for the **Corporate Banking segment**, with the goal of keeping business owners informed about the main challenges and opportunities in the economic, financial, and regulatory environment, and strengthening their decision-making capacity in highly volatile contexts.

Over the course of the year, two in-person **training sessions** were held in various cities across the country, including **Cali, Barranquilla, and Medellín**, with an average duration of **two to three hours per session**. These initiatives were attended by **241 participants** and represented an **approximate investment of \$28.397.614**.

The content covered was focused on:

- ✓ Sharing key information for business decision-making.
- ✓ Strengthening relationships with corporate clients.
- ✓ Promoting awareness and use of the Bank's financial solutions, such as payment systems and treasury solutions.

These training sessions helped strengthen the Bank's value proposition for the corporate segment and consolidate long-term strategic relationships.

Government Banking Training

As part of Banco de Occidente's commitment to institutional strengthening and the efficient management of public finances, training sessions were developed for **local and national government entities**, aimed at strengthening the technical and financial capabilities of public sector teams.

Throughout the year, multiple training sessions were held, with an average duration of **two hours per session**, reaching **more than 512 public servants** from provincial governments, departments, districts, and municipalities across different regions of the country. These initiatives represented a **total investment of \$24.685.423**.

The training sessions focused primarily on:

- ✓ **Tax regulations and fiscal strengthening**, including updates on tax stamps, the unified property tax, registration tax, and territorial taxes.
- ✓ **Financial and budgetary management**, addressing issues related to budgeting, funding sources, and financial diagnostics for local governments.
- ✓ **Public procurement and digital tools**, with an emphasis on the use of platforms such as SECOP II and processes in the health sector.
- ✓ **Territorial planning and sustainability**, including development plans, land use planning, and multipurpose cadasters.

- ✓ **Pension liability management**, through training on reducing pension liabilities (FONPET).

These actions **strengthened public management, financial planning, and regulatory compliance** among the entities served.





Corporate Banking and SME Training

In 2025, Banco de Occidente promoted a **comprehensive training portfolio** aimed at strengthening the competitiveness, sustainability, and growth of **companies and SMEs** through training programs designed to address their strategic and operational needs.

In total, **12 certificate programs** were offered, **each** lasting an average of **16 to 18 hours**. These initiatives addressed key topics in business management and attracted a large number of participants.

Among the main programs offered, the following stand out:

- ✓ **Tax Update 2025:** A program designed to train participants on reforms and regulatory updates to the Colombian tax system, facilitating the correct interpretation and application of current regulations; it reached **1.624 companies and 1.392 SMEs, with 1.030 attendees**.
- ✓ **Strategic Talent Management:** Training focused on developing competencies for the comprehensive management of human talent, including performance evaluation, leadership, and strengthening high-performance teams; involving **1.219 companies and 266 SMEs, with 313 attendees**.
- ✓ **How to Increase Sales with Artificial Intelligence:** A training program focused on the use of artificial intelligence tools to optimize business processes, data analysis, and sales strategies, reaching **374 companies and 257 SMEs, with 218 participants**.



- ✓ **Financial Management for High-Impact Companies:** A program aimed at strengthening advanced financial capabilities, addressing topics such as financial planning, cost analysis, and strategic decision-making, involving **481 companies and 329 SMEs, with 309 attendees**.

- ✓ **Corporate Leadership for Women:** Training focused on empowering women's leadership in the business environment, promoting equity and the development of management skills, impacting **356 companies and 193 SMEs, with 249 attendees**.

- ✓ **Digital Marketing and Analytics:** A program aimed at strengthening capabilities in digital strategies, data analysis, and brand positioning in digital environments, involving **505 companies and 162 SMEs, with 153 attendees**.

- ✓ **Labor Law for Non-Lawyers:** A program designed to provide business owners and talent managers with essential knowledge of labor law, facilitating regulatory compliance and the proper management of labor relations; reaching **775 companies and 474 SMEs, with 293 participants**.

- ✓ **Project Management and Agile Methodologies:** Training focused on the implementation of agile methodologies and best practices for the efficient management of business projects, involving **912 companies and 663 SMEs, with 281 attendees**.

- ✓ **Digital Business Innovation:** A program aimed at developing strategic and technological competencies for the adoption of digital solutions and innovative business models, impacting **239 companies and 292 SMEs, with 118 participants**.

- ✓ **Performance evaluation and performance management:** Training focused on the design and implementation of systems for measuring and monitoring organizational performance, with participation from **244 companies and 257 SMEs, and 113 attendees**.

- ✓ **Experience Design and Customer Loyalty:** A training program aimed at enhancing customer experience through service design tools and loyalty strategies, reaching **133 companies and 129 SMEs, with 85 participants**.

- ✓ **Soft Skills for Team Leaders:** A program aimed at developing key soft skills, such as effective communication, collaborative leadership, and change management, involving **205 companies and 274 SMEs, with 119 participants**.

In total, these training sessions saw the active participation of **3.289 attendees** and represented a **total investment of \$339.342.912**, allocated to ensuring academic quality, the participation of specialized experts, and the use of technological tools for a comprehensive learning experience.



Maestros del Hacer

In line with its commitment to financial inclusion and economic empowerment, Banco de Occidente continued to strengthen the **Maestros del Hacer** program, designed as a comprehensive financial education platform aimed at customers and communities.

The program expanded its reach by developing **five specialized financial education forums**, primarily aimed at customers in the Retail Banking segment, with a focus on investment, financial planning, and setting goals for 2026. These forums were organized through **Hacertivos**, a free virtual platform offering educational content such as forums, podcasts, and training modules.

In total, the forums had **1.878 registered participants and 471 actual attendees**, representing an **approximate investment of COP 50 million**, aimed at strengthening financial education and the quality of the content.

The forum with the widest reach was “**Discover Bre-B: Instant Payments, No Waiting**,” which had **1.187 registered participants and 240 attendees**, demonstrating customers’ interest in instant payment solutions and financial digitization.

In 2025, **Maestros del Hacer directly impacted 471 beneficiaries**, consisting of customers who actively participated in the training sessions.

The training and educational initiatives carried out in 2025 contributed to:

- ✓ Strengthen clients’ ability to make informed decisions.
- ✓ Improving the use and understanding of financial products and services.
- ✓ Increasing trust and fostering long-term relationships with the Bank.
- ✓ Enhancing the competitiveness and sustainability of companies, SMEs, and public entities.

Through this comprehensive capacity-building strategy, Banco de Occidente reaffirms its role as a **strategic partner to its customers**, promoting an experience that goes beyond the transaction and is established as a process of support, learning, and the creation of shared value.





Responsible marketing and financial consumer protection

| GRI 417 |

At Banco de Occidente, we view **responsible marketing** as a key element in building relationships of trust with our clients and other stakeholders. In this regard, we manage our commercial communications based on principles of **transparency, clarity, accuracy, and timeliness**, ensuring that information about financial products and services is understandable, sufficient, and aligned with current regulations.

This approach seeks to protect the rights of financial consumers, promote informed decisions, and prevent practices that may be misleading, in accordance with the **Financial Consumer Service System (SAC)**, applicable regulations, and the guidelines defined by **Grupo Aval**.

Responsible marketing management at the Bank is carried out through internal processes for **reviewing, validating, and controlling** commercial materials, campaigns, and messages directed at customers, systematically considering aspects such as:

- The characteristics, conditions, and costs of financial products and services.
- The associated risks and the financial consumer's responsibilities.
- The appropriate use of communication channels and responsible audience segmentation.

- Compliance with applicable regulations regarding financial advertising and consumer protection.

This approach is implemented differently depending on the type of product, recognizing the specific characteristics of the **Transactions and Loans segments**, and tailoring messages and content to the risks and impacts associated with each.

Transactions Clan

In the **Transactions Clan**, responsible marketing is geared toward ensuring that customers receive clear, accurate, and easily accessible information about the features, terms, and use of transactional products, such as **savings and checking accounts, transfers, payment methods, banking correspondents, and digital channels**.

Communications associated with this cluster explicitly include:

- A detailed description of the features of transactional products and services, including their scope, limitations, and terms of use.
- Transparent information on **fees, commissions, and operating costs**, presented in a way that is understandable and visible to customers.

- Preventive and educational messages regarding the **safe use of channels**, the protection of personal data, and fraud prevention.
- Clear information on the **rights and obligations of financial consumers** in transactional operations, in accordance with current regulations.

All marketing materials, campaigns, and informational content from the Transactions division undergo internal review and validation processes to avoid ambiguous messages or those that may create false expectations regarding benefits, service availability, or preferential terms.

Information regarding the Transactions Clan's products is available to customers through the following institutional channels:

- The Bank's transactional portal and informational pages (Products and Services section).
- Official fee schedules published on digital channels.
- Informational communications sent to customers and distributed at branches and correspondent locations.
- Contractual documentation and informational material validated by the Customer Service Center (SAC).





Clan Loans

For the **Loans Clan**, the responsible marketing approach is reinforced due to the impact that credit products can have on customers' financial situations. Therefore, the Bank adopts strict criteria of **transparency, adequacy, and balance** in the information disclosed, promoting responsible borrowing and avoiding practices that may encourage over-indebtedness.

Commercial communications for this clan must include:

- Clear and complete information on the **financial terms of credit products**, including interest rates, terms, installments, associated costs, and disbursement conditions.
- Explicit disclosure of the **customer's obligations**, the risks associated with debt, and the consequences of default.
- Messages aimed at promoting **responsible financial decisions**, avoiding impulsive contracting of credit products.
- Coherence and consistency of the information disclosed across all communication channels.

Advertisements and informational materials for credit products are reviewed by the responsible departments prior to publication to verify regulatory compliance and alignment with financial consumer protection principles.

In addition, the Bank supplements its marketing efforts with **educational content**, simulators, and decision-making tools that help customers assess



their ability to pay and fully understand credit products.

Information regarding the Loan product family is available through:

- Credit product information pages on the Bank's digital channels.
- Credit simulators and digital support tools.
- Rate schedules and contractual documents published on official channels.
- Educational materials associated with financial education programs.

Through its responsible marketing approach, Banco de Occidente reaffirms its commitment to ethical, clear, and customer-centric communication. Managing products by category allows the Bank to address the specific needs of each financial

solution, strengthen customer trust, and contribute to a sustainable, long-term relationship based on transparent information and responsible decision-making.

In 2025, Banco de Occidente consolidated a comprehensive approach to managing customer experience, strengthening a model that integrates inclusion, local presence, service continuity, rigorous measurement, organizational culture, financial education, and responsible marketing. The progress achieved reflects an evolution in how the customer experience is managed and reported, shifting from the execution of isolated initiatives to a systemic approach focused on generating sustainable value and long-term relationships. By strengthening local channels such as banking correspondents, implementing active listening models, promoting a customer-centric culture, and developing capabilities

across different segments, the Bank reaffirms its commitment to an accessible, transparent, and reliable experience that contributes to people's well-being, the strengthening of the business fabric, and the economic and social development of the regions where it operates.

The Bank reaffirms its commitment to delivering an accessible, transparent, and reliable experience that contributes to people's well-being, strengthens the business fabric, and fosters the economic and social development of the regions in which it operates.



Commitment to communities



SDG 10.2; 13.2;
15.1; 17.5

At Banco de Occidente, we view our **engagement with communities** as a fundamental pillar of our sustainable management. In 2025, we strengthened our approach toward a **more structured and measurable social impact approach**, aimed at generating positive and sustainable impacts in the regions where we operate and have a presence.

Our commitment to communities is realized through **social investment programs, corporate volunteering, and strategic partnerships**, which seek to bridge social gaps, strengthen local capacities, and promote social, environmental, and economic well-being, in line with our Sustainability Strategy and the Sustainable Development Goals.

Throughout the year, we made progress in consolidating a **social management model** that prioritizes transparency, shared responsibility, and impact measurement, allowing us to direct our resources toward initiatives aligned with the needs of the region and our corporate purpose.

Social Investment

At Banco de Occidente, **social investment** is a key driver of inclusive and sustainable development of the communities **where we operate**. Throughout 2025, we operated in accordance with our **Social Investment Policy**, a framework that guides our decisions and ensures that every contribution is made voluntarily, responsibly, ethically, and in alignment with our Sustainability Strategy and the Sustainable Development Goals (SDGs) in order to create measurable social impact.

More than just financial support, we seek to be a **strategic partner for these regions**, strengthening local capacities and helping to improve people's quality of life. We are convinced that well-managed social investment generates shared value, fosters more inclusive and resilient environments, and lays a solid foundation for the country's long-term economic and social development.

Social Investment Policy



Our Social Investment Pillars

Our **Social Investment Policy** defines **three strategic pillars** that guide our decisions and ensure that every initiative we support has a clear purpose, a verifiable impact, and aligns with our Sustainability Strategy.



Environmental Conservation:

Through this pillar, we support programs and projects aimed at protecting natural resources, conserving biodiversity, and strengthening resilience to climate change. We promote initiatives that contribute to the adaptation to and mitigation of environmental impacts and to the development of a culture of caring for the natural environment in local communities.



Education for development:

We believe that education is a key tool for creating opportunities. Therefore, we support initiatives that strengthen knowledge and skills among different populations, contributing to personal, family, work, and professional development, and promoting inclusion and social mobility.



Inclusive social development:

This pillar brings together programs aimed at improving quality of life and promoting social progress in communities. Through these initiatives, we seek to foster social inclusion, well-being, and the strengthening community resilience and social cohesion, with a special focus on vulnerable populations.





Strengthening Impact Monitoring and Measurement

As part of the evolution of our **social investment model**, in 2025 we took an important step toward strengthening the mechanisms for **monitoring and measuring the impact** of our donations and social contributions. This progress allowed us to improve the traceability and accountability of resources and gain a deeper understanding of the results of the initiatives we support.

To this end, we implemented standardized monitoring reports through which partner organizations share information on project progress, challenges faced, and lessons learned during implementation, as well as the quantification and characterization of the impacted population. This information allows us to assess the actual scope of our actions and strengthen continuous improvement processes.

In addition, we conducted **verification visits** to partner organizations, which allowed us to see firsthand the progress made, validate evidence of the impact generated, and strengthen our relationship with implementing organizations, based on a spirit of support and shared responsibility.

Coordination with Corporate Volunteering

At the same time, in 2025 we began developing a new value proposition for our **Corporate Volunteering program**, with the aim of ensuring that every initiative generates a significant impact for both the communities and the volunteers themselves.

This approach seeks a shared benefit among the community, the organization, and our employees, and is structured around the three pillars of our **Social Investment Policy**: environment, education for development, and conscious social growth.

The development of this framework, which continued to advance throughout the year, lays the groundwork for us to consolidate a volunteer program in 2026 that is fully aligned with our social and environmental impact goals, ensuring that every hour of volunteer work contributes directly and measurably to community development.





Strengthening access to water and sanitation in vulnerable communities with UNICEF

| BdO-14 |

As part of our commitment to regional development and the reduction of structural disparities, in 2025 we continued to strengthen our **strategic partnership with UNICEF**, aimed at improving sustainable access to **safe drinking water**, basic sanitation, and hygiene practices in rural areas of the department of **La Guajira**, through the **WASH (Water, Sanitation, and Hygiene)** program.

We recognize that La Guajira faces conditions of high social, environmental, and climate vulnerability, associated with water scarcity, the geographic dispersion of rural communities, high poverty rates, and limited coverage of basic services.

In this context, the collaboration between Banco de Occidente, UNICEF, and local implementing partners is established as a high-impact social intervention, focused on **guaranteeing fundamental rights and strengthening community resilience**.

In terms of **social investment**, in 2025, Banco de Occidente allocated a total of **\$223.881.446 COP** to this program with the valuable contribution of **824 customers, and since 2022** we have donated a total of **\$2.134.110.976 COP**—resources directed toward implementing sustainable solutions that have tangibly improved the living conditions of the beneficiary communities and strengthened their resilience in the face of the region's social, environmental, and climate challenges. These interventions were carried out primarily in rural communities in the municipalities of **Manaure, Uribia, and Maicao**—areas prioritized by UNICEF due to their high levels of vulnerability and existing gaps in access to WASH services.

Access to safe drinking water:

In 2025, progress was made in rehabilitating and improving water supply systems in priority communities. A significant milestone was the installation of a drinking water production station equipped **with a Drinking Water Treatment System (DWTS)** in the community of Campamento (Maicao), ensuring water safe for human consumption for **399 families (1.595 people) and 487 students**. This intervention helps reduce health risks and strengthen water security in an area affected by climate variability.

Basic sanitation:

In the sanitation component, the program made progress in implementing the **SAHTOSO methodology**, resulting in **11 communities** being certified as **open-defecation-free**. As a result, **523 people**, including **254 children**, now have self-built latrines in their homes, improving sanitary conditions and reducing the risks associated with waterborne diseases.

In addition, we supported **103 families (523 people)** in strengthening **hygiene practices** through behavior change strategies promoted by UNICEF, with an emphasis on **handwashing with soap** and the adoption of social norms that promote the sustainability of these practices over time. These actions are essential for disease prevention and the enhancement of community well-being.

The program's implementation faced challenges related to **climate variability**, the **geographic dispersion** of rural communities, and, in some cases, **cultural resistance** to changes in traditional practices. However, these challenges helped strengthen the program's **participatory approach**, promoting community dialogue and the joint development of solutions tailored to the local context.

As an opportunity, the program has demonstrated high potential for:

- ✓ Empower communities in the **sustainable management** of WASH services.
- ✓ Strengthen the **climate resilience** of the territories.
- ✓ Contribute to the development of **local livelihoods** associated with the operation and maintenance of water and sanitation systems.

The partnership with UNICEF reflects our commitment to a **territorial development model based on strategic alliances**, which integrates social investment, technical expertise, and community management. This initiative aligns with the **Sustainable Development Goals**, particularly SDGs **6** (Clean Water and Sanitation), **3** (Good Health and Well-being), **10** (Reduced Inequalities), **13** (Climate Action), and **17** (Partnerships for the Goals), and reinforces our role as a stakeholder committed to **long-term social transformation**.



Impact Dimension	Indicator	Result / Reported Figure
Social investment	Total investment executed.	\$223.881.446 COP
Population coverage	Total number of beneficiaries.	18.018 people
	Women benefited.	6.126
	Men benefited	5.586
	Children and adolescents.	6.810
Geographical coverage	Departments served.	La Guajira
	Priority municipalities.	Manaure, Uribia and Maicao
Access to drinking water	Water systems implemented or rehabilitated.	15 systems in operation
	Community with STAP installed.	Campamento (Maicao)
	Families with access to safe drinking water.	399 families
	People benefiting from access to water.	1.595 people
	Students benefiting.	487 students
Basic sanitation	Communities certified as open defecation-free.	11 communities
	People with access to improved sanitation.	523 people
	Children benefiting from sanitation	254
	Communities with self-built latrines.	45 communities
Hygiene and health	Families that improved hygiene practices.	103 families
	People benefiting from improved hygiene.	523 people
	Hygiene kits distributed.	5.500 kits
Social infrastructure	Schools strengthened with WASH services.	46 schools
	Health centers with WASH improvements.	5 centers
Supplementary access	Water filters delivered.	1.453
	Water containers delivered.	360
Community-based approach	Communities prioritized using the SAHTOSO approach.	70 communities
	Communities with improved hygiene practices.	15 communities
Timeframe	Implementation period for the reported impact.	2021 — 2025



Environmental education and community empowerment

In 2025, at Banco de Occidente, we strengthened our approach to **environmental education** and community capacity building, consolidating initiatives aimed at knowledge transfer and awareness, environmental awareness, and the empowerment of local actors as pillars for long-term sustainability in the territories **where we operate**.

This approach took shape through training activities, community coordination platforms, and educational processes that integrate educational content, active participation from partners, and mechanisms for measuring the social impact generated.

Within this framework, the **production of the Ecolibros** was consolidated in 2025 as one of the Bank's main initiatives to promote reading, knowledge of Colombian biodiversity, and awareness of ecosystem protection, integrating environmental education, culture, and social action.

During the reporting period, the following results were achieved:

✓ **19.500 Ecolibros produced**, corresponding to the edition “Colombia: The Orchid Garden,” dedicated to an emblematic species of the country's biodiversity.

✓ **550 Ecolibros delivered** to partner organizations for educational and cultural initiatives, distributed as follows:



✓ **500 copies to the Fundación Educambio**, which was able to **sell them** for the first time at events such as the **68th Cali Book Fair**, raising approximately **\$3.500.000** from sales, funds allocated to strengthening its social projects. This initiative generated a **dual impact**: educational and financial.

✓ **50 copies to the Fundación Gestión Sostenible**, intended for environmental education initiatives in communities linked to the *Formando Héroes* program.

✓ **First-time participation in the Cali Book Fair**, where the **41 historical editions of the Ecolibros** were exhibited, expanding their visibility and cultural reach.

In terms of direct social impact, the production and delivery of the Ecolibros benefited **120 children** associated with the Fundación Pan Vivo through supplementary educational materials that included children's and young adult books, school kits, bookshelves, teaching materials, and technological resources such as tablets, a laptop, a video projector, speakers, and microphones.

Additionally, the Ecolibros were included in **educational kits** that benefited **6.389 students** in the municipalities of **Sonsón, Caldas, and Puerto Berrío (Antioquia); Cartagena (Bolívar); Cimitarra (Santander); and Viterbo (Caldas)**, expanding the territorial reach of this initiative to communities with limited access to environmental education content.

Planeta Azul Community

In 2025, we launched a new phase to strengthen the **Planeta Azul Community**, conceived as a coordination platform that brings together companies, social organizations, foundations, clients, NGOs, educational institutions, and individuals committed to environmental sustainability.

This process helped consolidate the community as a space for gathering, knowledge exchange, and collective action, aimed at promoting collaborative efforts to care for the environment and foster sustainable development.

Key achievements include:

✓ **Characterization of community members** through a survey that identified:

✓ The diversity of participating stakeholders.

✓ Thematic interests in environmental sustainability.

✓ The willingness to engage in collaborative initiatives.

✓ **Holding of two in-person ECOS — Sustainability Meetings**, held in:

✓ Cali, as part of Biodiversity Week.

✓ Bogotá.

✓ **Approximately 100 people participated**, with around 50 attendees per meeting, and the involvement of expert speakers who shared best practices and experiences in sustainability, strengthening the exchange of knowledge among participants.

As a result of these initiatives, opportunities for **inter-institutional partnerships** were identified, including exploratory initiatives among community members such as **Educambio and Terrasos**, which underscore the role of the Planeta Azul Community as a **catalyst for collaborative projects**.

Additionally, in 2025 we made progress in designing a **mentoring program**, in partnership with **ICESI University**, aimed at strengthening the technical and management skills of finalists and winners of the Planeta Azul Award. The goal is to launch this program in **2026**, as part of the community's consolidation and outreach efforts.





Environmental Volunteering

Corporate volunteering is a key component of our sustainability strategy, as it allows us to translate our environmental and social commitments into concrete actions in the regions where we operate. Within this framework, the **environmental education** component was strengthened through workshops that incorporated experiential learning processes for our employees and local communities, promoting greater environmental awareness and culture within the Bank.

In 2025, we carried out **environmental volunteer initiatives in partnership with WWF Colombia**, aimed at contributing to the **ecological restoration** of the country's **strategic ecosystems**. These actions were coordinated with environmental authorities and local partners and were framed within the **Nature-Based Solutions (NbS)** approach, contributing to national objectives for restoration, adaptation to climate change, and biodiversity protection. In this way, the initiatives were primarily aligned with **Sustainable Development Goals (SDGs) 15** (Life on Land), **SDG 13** (Climate Action), and **SDG 8** (Decent Work and Economic Growth), by promoting employee participation in environmental actions with a territorial impact.

The workshops included activities such as planting, maintenance, and restoration of vegetation cover in key areas for **water security**, ecological connectivity, and climate resilience, viewing these interventions as part of a long-term conservation strategy that goes beyond one-off actions.

Key Results for 2025:

- ✓ **Three days of environmental volunteering** in strategic ecosystems:
 - ✓ Barranquilla — Isla Salamanca National Park.
 - ✓ Cali — Farallones National Natural Park.
 - ✓ Bogotá — Las Moyas Trail.
- ✓ **Participation of 164 volunteer employees.**
- ✓ **1.028 volunteer hours**, of which **938 hours** were spent planting trees and **90 hours** on social volunteer work.
- ✓ **440 seedlings planted**, as a direct contribution to ecological restoration efforts.
- ✓ Initiatives in **areas of high environmental value**, raising awareness about biodiversity, conservation, and climate change.

Additionally, the social component of corporate volunteering helped create **more inclusive environments** and meaningful experiences for vulnerable children and communities, strengthening community cohesion and our employees' participation in the region's social development. These actions align with **SDG 3** (Good Health and Well-being), **SDG 10** (Reduced Inequalities), and **SDG 17** (Partnerships for the Goals).

Together, these initiatives not only contributed to environmental restoration but also strengthened the Bank's **internal environmental culture**, promoting shared responsibility and our employees' commitment to sustainability and long-term social transformation.



Volunteering	Description	City	Employees	Hours
Tree-planting event in Barranquilla at Vía Parque Isla Salamanca	Corporate volunteer day in areas of high ecological value. This initiative supported the recovery of an environmentally sensitive ecosystem, with the participation of 25 volunteers and the planting of 200 saplings.	Barranquilla	25	7
Tree-planting event in Cali at Farallones National Natural Park	Corporate volunteer day in areas of high ecological value. This initiative supported the recovery of an environmentally sensitive ecosystem, with the participation of 59 volunteers and the planting of 120 seedlings.	Santiago de Cali	59	7
Tree-planting event in Bogotá at the Las Moyas Trail	Corporate volunteer day in areas of high ecological value. This initiative supported the recovery of an environmentally sensitive ecosystem, with 50 volunteers participating and 120 seedlings planted.	Bogotá, D.C.	50	7
Social volunteer day with children from the fundación Casita de Belén.	The event took place on December 16 with employees participating in recreational activities and praying the Christmas novena. These activities contributed to the emotional and social development of the participating children, while offering employees an opportunity for human connection, empathy, and service.	Santiago de Cali	15	3
Social volunteer day with children from the fundación Casita de Belén.	Event held on December 19 with employees to participate in recreational activities and pray the Christmas novena. These activities contributed to the emotional and social development of the participating children, while offering employees an opportunity for human connection, empathy, and service.	Santiago de Cali	15	3
Beautification and renovation of spaces at the Multipurpose Educational Institution	Renovation of spaces and furniture at the Multipurpose Educational Institution, located in Siloé, Comuna 20, Cali. We painted classrooms, chairs, and common and recreational areas. The budget for the volunteer project is included in the registered social contribution	Santiago de Cali	22	6





Contributions to social and sustainable development

| BdO-15 |

In 2025, we consolidated our **social contribution** strategy as a key mechanism for addressing priority needs in vulnerable communities and strengthening programs led by strategic partners. These voluntary contributions, aligned with our **Social Investment Policy**, prioritize education, well-being, and inclusion, integrating a vision of social, environmental, and economic impact across all initiatives.

This approach allowed us to respond quickly to the needs of urban and rural communities, reaffirming our role as a committed stakeholder in the development of the regions where we operate. We carried out these actions primarily through the distribution of school kits, toys, food and hygiene aid, items for people with disabilities, and kits for farmers, helping to improve the living conditions of children, rural families, and other socially vulnerable populations.

Contributions made in 2025 generated a direct social impact on **thousands of people**, primarily children and families in vulnerable situations, contributing to:

- ✓ Promote the **emotional and social well-being** of children.
- ✓ Facilitate **access to education** by providing school supplies.
- ✓ Strengthen **rural productivity** and farmers' livelihoods.
- ✓ Address **social and health emergencies**.
- ✓ Promote the **inclusion of people with disabilities**, improving their quality of life.

Type of contribution	Description of the contribution	Beneficiary population	Quantitative impact	Investment / Estimated value
Toys — Christmas	Distribution of toys to vulnerable children in different regions of the country.	Children aged 0 to 12.	6.519 children benefited.	\$244.330.000 COP.
		Valle Region.	2.026 toys.	75.920.000 COP.
		Northern Region.	1.813 toys.	67.970.000 COP.
		Central Zone.	1.341 toys.	50.300.000 COP.
		Bogotá Area.	173 toys.	6.500.000 COP.
School kits	Provision of school supplies to facilitate access to and retention in the education system.	Children from economically disadvantaged communities.	Consolidated figures by program.	Between \$500.000 and \$8.000.000 COP per initiative.
Farmer kits	Distribution of basic tools to support agricultural activities.	Rural communities.	Productive support for farming households.	Between \$500.000 and \$8.000.000 COP per initiative
Food and health assistance	Supply of basic supplies in emergency situations and cases of forced displacement.	Vulnerable families.	Assistance to communities affected by emergencies.	Between \$500.000 and \$8.000.000 COP per initiative
Items for people with disabilities	Provision of equipment to improve quality of life and promote inclusion.	People with disabilities.	Direct functional and social support.	Between \$500.000 and \$8.000.000 COP per initiative.

We measure the impact of our actions through the number of beneficiaries, the type of contribution provided, and the geographic reach. This monitoring allows us to evaluate the relevance of our donations and optimize resource allocation in future periods, ensuring that each investment generates the greatest possible value for communities.

In 2025, we established a **structured and measurable social management framework**, aligned with the needs of local communities and strengthened

through development programs, volunteer initiatives, environmental education, and strategic partnerships. We have evolved from isolated initiatives toward a comprehensive approach to creating shared value, enabling us to report on our contributions with greater rigor and clarity. This progress reaffirms our commitment to inclusion and sustainability, and lays the groundwork for deepening impact measurement and building lasting relationships with the communities where we operate.



Donations

In line with this approach, during the year we made donations to partner organizations working in different regions of the country, contributing to the strengthening of local capacities, support for vulnerable populations, and the promotion of conscious social development. Through these partnerships, we seek to expand the reach of our actions and generate positive and sustainable impacts in the communities where we operate.

Among the supported organizations are:



ProPacífico – Foundation for the Comprehensive Development of the Pacific

In 2025, we supported **ProPacífico**, a foundation that advances the comprehensive development agenda of Cali, Valle del Cauca, and the Pacific region through the mobilization of partnerships and coordination among the public, private, and academic sectors. Our contribution was aimed at strengthening strategic initiatives with a **territorial and long-term focus** that promote social, educational, environmental, infrastructure, and health development.

With this donation, we seek to support a regional agenda that contributes to **the sustainable development of the territory** by strengthening institutional capacities, promoting social equity, and helping to improve the quality of life for the population, especially in contexts of greater vulnerability.

→ **Amount donated in 2025:** \$158.000.000 COP

The donation aligned with the following lines of work:

- **Education:** promotion of initiatives to expand coverage and improve educational quality, as well as strengthening of socio-emotional, pedagogical, and technical skills.
- **Health:** support for strengthening the health system, in accordance with Statutory Law 1751 of 2015, and improving timely access to women's health diagnostics.
- **Social development:** protection and promotion of the rights of vulnerable populations, and strengthening of social control, transparency, and peacebuilding.
- **Environment:** conservation, restoration, and sustainable use of natural resources.
- **Infrastructure and competitiveness:** promotion of strategic infrastructure, logistics, and mobility projects.
- **Business development:** promotion of entrepreneurship and strengthening of the business sector.
- **Human rights and global goals:** alignment with the United Nations Sustainable Development Goals.
- **Support for non-profit organizations:** strengthening organizations that carry out commendable activities throughout the country.

Our partnership with ProPacífico helps generate **structural and sustainable impacts** in the region, strengthening public-private coordination, improving the quality of social services, and promoting more equitable, competitive, and resilient regional development.

Beneficiary dimension	Key impacts	
Education	✓ 1.200 children strengthened their social-emotional skills. ✓ 616 children benefited in early childhood. ✓ 49 educators strengthened their teaching skills. ✓ 60 workers from 4 companies participated in dual education programs (2024—2025).	✓ 34 public schools in Cali successfully coordinated educational offerings with the private sector. ✓ Implementation of the Regional Education Agenda, comprising five strategies that coordinate public, private, and academic efforts to improve access, retention, and educational quality. ✓ Benefiting areas: Eastern Cali, Vijes, La Cumbre, Pradera, Florida, and Cali.
Infrastructure	✓ Consolidated progress on strategic projects for competitiveness, infrastructure, and mobility in Valle del Cauca, such as: commuter rail, strategic corridors and road network, airport, and dredging of the Port of Buenaventura.	✓ Departmental scope throughout the Valle del Cauca. ✓ Between 2018 and 2025, these projects advanced toward approval and construction phases, strengthening regional competitiveness.
Environment	✓ Support for the Technical Secretariat of the Río Cauca Collective, promoting environmental conservation and restoration actions. ✓ Development of environmental feasibility studies in 10 municipalities of Valle del Cauca. ✓ Structuring of the Water for All project, ready for a call for proposals, and technical strengthening of a social organization to consolidate the feasibility studies.	✓ Cauca River Collaborative Platform: 10 municipalities in Valle del Cauca. ✓ Water for All Project: expected impact in Jamundí, Yumbo, and Tuluá.
Health	✓ 75% of women with BI-RADS 4 and 5 currently have access to diagnostic confirmation via biopsy. ✓ Reduction of the average wait time for a biopsy to 47 days, with a sustained trend toward improvement. ✓ More than 3.000 women diverted from the diagnostic pathway.	✓ Nearly 200.000 women screened through the regional mammography network, strengthening risk management and population traceability. ✓ Implementation of the model in Cali and 11 municipalities in Valle del Cauca, with the participation of IPS, EPS, and Health Secretariats.



As part of this partnership, in 2025 we also supported the **Compromiso Valle** initiative, led by ProPacífico and aimed at helping to **close socioeconomic gaps** in priority municipalities in Valle del Cauca —Cali, Buenaventura, Palmira, Yumbo, Buga, Jamundí, Candelaria, and Tuluá—through a comprehensive approach focused on populations facing the greatest challenges.

→ **Amount donated in 2025:** \$350.000.000 COP

This initiative coordinates actions in food security, life transformation, entrepreneurship, employability, leadership, and education, with cumulative results of high social impact. Between **2021 and 2025**, more than **77.000 people** have participated in its programs, of whom **12.344 were in 2025**, reflecting an inclusive approach with high participation by **women (74%)**, youth, and the Afro-descendant population.

During the year, the following results stood out, among others:

- **Food security:** distribution of more than **43.800 food rations** and establishment of **44 urban gardens**, strengthening access to food and the productive use of community space.
- **Life-changing projects:** **2.030 early conflict mediations**, with a **91%** success rate in achieving positive resolutions.
- **Entrepreneurship and employability:** participation of more than **6.000 people**, **658 startups in formation**, and the creation of **604 inclusive jobs**, promoting sustainable income and formal employment opportunities.
- **Leadership and social empowerment:** support for community initiatives and social organizations with the participation of 380 people, with projected and self-managed resources exceeding **\$1,7 billion**, strengthening local leadership and citizen participation.



nuevo futuro:

Nuevo futuro – Asociación de Nuevo Futuro de Colombia

In 2025, we supported the **Nuevo Futuro Association of Colombia**, located in Bogotá, an organization dedicated to the well-being and holistic development of **children and adolescents** through support processes that strengthen skills, life plans, and the creation of **protective environments**.

Our contribution was allocated to supporting the implementation of training programs and to funding the maintenance and development of activities aimed at the young people associated with the organization, with the goal of promoting their emotional, social, and educational development. The young people receiving support come from **highly vulnerable and psychosocially risky backgrounds** and require comprehensive and sustained support to advance in their educational and life trajectories.

As part of this support, **16 university students** served at the **University House** directly benefited; they are currently enrolled in higher education institutions, in undergraduate programs and, in some cases, graduate programs.

→ Amount donated in 2025: **\$7.393.400 COP**

The funds provided made it possible to:

- Carry out **facility repairs** aimed at improving the physical and structural conditions of the University House.

- Strengthen **safety and health conditions** at the facility, as well as the livability of common and private spaces.
- Make progress toward meeting **minimum infrastructure standards** that promote the physical and emotional well-being of young people.

Through this partnership, we contribute to creating more suitable conditions for students to remain in higher education and for the holistic development of young people facing greater challenges, reaffirming our commitment to **education for development** and social inclusion.

Thanks to this support, the **Nuevo Futuro Association of Colombia** was able to sustain and strengthen its support processes, contributing to the creation of **safe and protective environments** for the young beneficiaries. These actions contribute to the holistic development of children and adolescents and reinforce our commitment to **education for development and conscious social growth**, in line with our Social Investment Policy.



ProBarranquilla – Fundación ProBarranquilla

In 2025, we supported the **ProBarranquilla Foundation**, an organization working toward the **sustainable development of the Atlántico department** by promoting investment attraction, strengthening the business environment, and consolidating the region as a competitive destination both nationally and internationally.

Our contribution was aimed at supporting a **comprehensive strategy** focused on attracting and retaining private investment, promoting events and meetings tourism, and positioning Barranquilla and the Atlántico region as an attractive destination for business and economic development.

→ **Amount donated in 2025:** \$37.630.000 COP

The funds provided enabled support for strategic activities such as:

- Engaging with potential investors through specialized programs and providing support during the setup process.
- Promotion of **meetings, events, and leisure tourism** through familiarization trips and

participation in specialized trade shows and events.

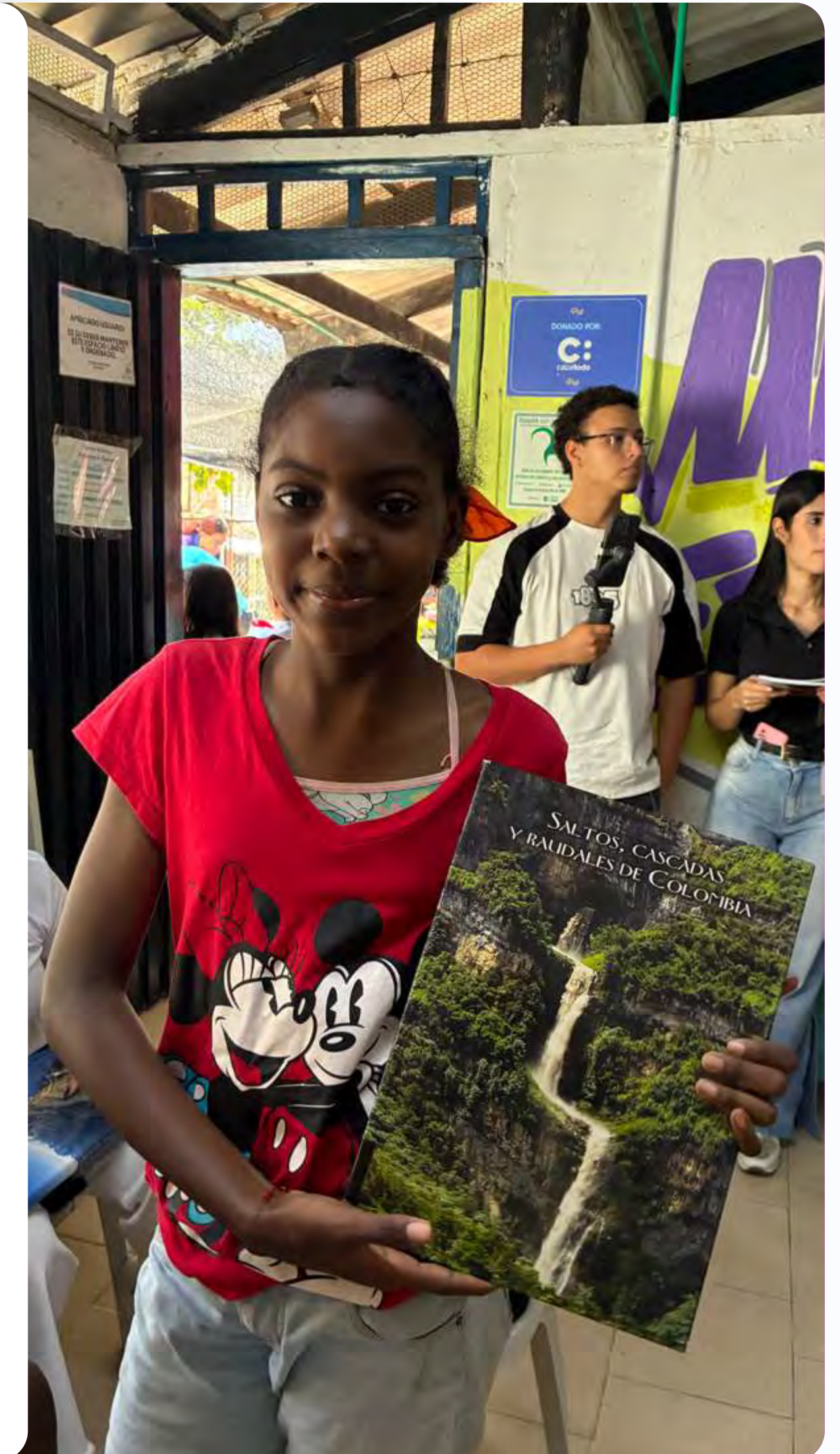
- Development of tailored information for investors, strengthening decision-making and knowledge of the business environment.
- Monitoring the investment climate and competitiveness, contributing to the continuous improvement of the region's business ecosystem.

The initiatives promoted by ProBarranquilla generated impacts on various stakeholders in the regional economic ecosystem, including:

- People employed directly and indirectly by investment projects established in Atlántico.
- Local companies supplying goods and services.
- Domestic and foreign investors.
- Strategic productive sectors such as manufacturing, food and beverages, chemicals and life sciences, logistics, and business services.
- MICE (meetings, incentives, conferences, and exhibitions) stakeholders, including hotels, operators, venues, and specialized services.
- Public and private institutions within the regional economic ecosystem.

Impacts generated:

- **3.900 direct jobs**, strengthening formal employment in the department.
- Attraction of domestic and foreign investment totaling approximately **USD 450 million**, driving regional economic growth.
- More than **47.000 attendees** at strategic meetings and events, boosting the local economy.
- **Economic spillover exceeding USD 45 million** associated with event tourism.
- Integration of local businesses into value chains and services associated with new investments.
- Strengthening of **regional competitiveness** and the business environment.
- Integration of Barranquilla and the Atlántico region into **global value chains** through nearshoring strategies.
- Consolidation of **public-private partnerships** aimed at the region's sustainable economic development.





UAV – Unidad de Acción Vallecaucana

In 2025, we supported the **Vallecaucana Action Unit (UAV)**, an organization dedicated to promoting **informed participation** and the development of **citizen leadership**, thereby strengthening citizen influence in regional public management and the exercise of social control.

Our contribution was allocated to strengthening processes that foster a more informed, active, and co-responsible citizenry, recognizing the role of social and youth leadership in building more transparent, participatory, and sustainable regions.

→ **Amount donated in 2025:** \$51.500.000 COP

The funds provided made it possible to promote initiatives aimed at:

- Strengthen **access to and use of public information**, facilitating citizen oversight of regional public administration.
- Developing **citizen leadership**, with an emphasis on youth and community organizations.
- Promoting **best practices in public administration** through the formulation and adoption of technical recommendations.

The actions carried out benefited **204 people**, including:

- University students interested in public affairs.
- Citizen organizations and groups.
- Members of **Community Action Boards**, coordinated through their federation.
- City council members linked through their representative association.
- Members of the **Cali Municipal Youth Council**.

Impacts generated:

- Improved **access to, understanding of, and usability of public information** through the

updating and development of data dashboards on public credit operations and the implementation of the participatory budget.

- Verifiable changes in **institutional practices**, resulting from the presentation and adoption of recommendations for best practices in the execution of public credit.
- Strengthening of **citizens' capacities for social control** through a training-action process with **20 youth leaders**, which led to the formation of the core group of **Citizen Watchdogs** for public credit operations in Cali.



FUNDAMOR

In 2025, we supported **FUNDAMOR**, based in Valle del Cauca, an organization dedicated to providing comprehensive care and support to **vulnerable children** through supplementary education programs that strengthen their holistic development and promote **protective environments**.

Our contribution was allocated to support the “**Dejando Huellas**” Program, as well as the “**Día de Galletica**” initiative, developed within the framework of the “**Tejiendo Sueños**” program, with the aim of reducing inequality gaps associated with low-quality education, preventing family separation, and strengthening the socio-emotional, cognitive, and physical skills of the beneficiary children.

→ Amount donated in 2025: **\$21.000.000 COP**

The funds contributed helped strengthen initiatives aimed at:

- **Complementary education**, through innovative pedagogical strategies that promote the holistic development of children.
- **Prevention of family separation**, ensuring safe and protective environments.
- Strengthening **socio-emotional, cognitive, and motor skills**, with an emphasis on care and well-being.



→ **Community awareness**, through the "Tejiendo Sueños" campaign, carried out in educational institutions and shopping centers in the city of Cali.

The supported initiatives directly benefited:

→ **144 children** enrolled in FUNDAMOR programs, aged 5 to 13, residing in areas such as La Buitrera, Pance, the El Chontaduro shantytown, Hormiguero, Jamundí, and Cali.

→ **715 students** from various schools in Cali who participated in the Tejiendo Sueños campaign.

These populations face conditions of **high social vulnerability**, including:

- Homes with overcrowding and limited access to basic services.
- Cases of displacement, migration, and impact from the armed conflict.
- Families with incomes below the minimum wage and limited educational levels.

Thanks to the support provided throughout the year, significant results were achieved:

→ **45.696 hours** during which children remained in a protective and educational environment.

→ **3.210** people indirectly impacted.

→ **96%** of children strengthened their cognitive and socio-emotional skills.

→ **64%** improved their grades in four or five subjects.

→ **41%** ranked in the top five at their schools.

→ **100%** of the children remained in their family environments, without being placed in foster homes.

→ **0%** of children were involved in recruitment situations.

Qualitatively, the program fostered the development of **children who were more secure**, with **greater confidence to take on challenges and express their opinions; more sociable, with better skills for interaction and group work; and more autonomous, as reflected in their ability to perform tasks independently.**



PRODEIN – Asociación Benéfica Cristiana Promotora de Desarrollo Integral

In 2025, we supported **PRODEIN — Christian Charitable Association for Integral Development**, located in Valle del Cauca, an organization committed to promoting the **integral development of children** in contexts of high social vulnerability. Our contribution was aimed at supporting the construction of an **educational institution** in the **Potrero Grande** neighborhood, in the Aguablanca District of the city of Cali, an area characterized by high rates of poverty and social exclusion.

The main purpose of this investment was **to expand access to decent, quality education** by creating appropriate educational environments that help reduce social risks and generate development opportunities for children and their families.

→ **Amount donated in 2025: \$400.000.000 COP**

The funds provided enabled progress in the construction and renovation of educational infrastructure, including:

- Partition walls and facades, ensuring safe and functional spaces.
- Electrical, voice, and data networks that support modern educational processes.

→ Water, sanitation, pressurized water, and fire protection systems, enhancing safety and health conditions.

→ Interior finishes, designed to create environments conducive to learning.

→ Metalwork, ensuring durability and protection of the spaces.

→ Exterior work, improving accessibility and the institution's surroundings.

The construction of this educational institution directly benefits **565 girls and boys** from vulnerable communities characterized by:

- Poverty or extreme poverty.
- Limited access to quality education.
- Risk of social exclusion and rights violations.

Through this support, we help create the conditions necessary for the holistic development of children, reaffirming our commitment to **education for development** and the creation of more equitable and protective environments.



Universidad de los Andes

In 2025, we supported the **Universidad de los Andes** through the “**Vamos Pa'lante**” program, an initiative aimed at promoting the **retention and graduation** of university students in Colombia who are at risk of dropping out due to financial difficulties.

Our contribution was directed toward reducing **financial barriers** that affect the academic continuity of talented young people, reaffirming our commitment to **education for development** and the creation of opportunities for social mobility through access to and retention in higher education.

→ **Amount donated in 2025: \$150.000.000 COP**

The funds provided made it possible to:

- Support the academic retention of students in economically vulnerable situations.
- Reduce the risk of **college dropout** by mitigating financial factors that contribute to students leaving their studies.
- Support vocational training programs, strengthening long-term educational trajectories.

The program directly benefited **14 students**, whose main characteristics are:

- Young people between the **ages of 16 and 21**.
- Belonging to **socioeconomic strata 1 through 4**.
- Students in academic programs other than medicine.
- Individuals facing economic vulnerability that jeopardizes the continuity of their studies.

Through this support, we contribute to:

- Preventing **college dropout** rates by strengthening student retention.
- Eliminating financial barriers that limit access to and continuity in higher education.
- Promote **graduation of college students**, expanding their opportunities for personal and professional development.



Sponsorships with a social and business focus

We promote initiatives that generate **social value**, strengthen the **business community**, and contribute to the development of the regions **where we operate** through our **sponsorship** strategy. We direct this support toward fostering spaces for dialogue, training, and leadership, as well as supporting companies and startups that stimulate the economy and promote responsible practices.

In this way, we consolidate our sponsorships as a strategic tool to strengthen our relationships with our stakeholders and expand our positive impact in the social and productive spheres.

For details on the sponsorships we have undertaken, their scope, and main beneficiaries, we invite you to consult the **Annex on Corporate Sponsorships** and the **Annex on Social Sponsorships**.





Banca Gobierno and Its Social Impact

At **Banca Gobierno**, we support public entities in fulfilling their functions, convinced that **responsible financial management** also has a direct impact on the well-being of communities. Through our social contributions, we help strengthen the social, environmental, and economic development of the regions **where these entities provide their services**.

Our approach is based on **voluntary contributions** aimed at supporting initiatives that address the real needs of the population, especially in vulnerable contexts. These contributions take the form of actions such as the distribution of school supplies, toys, food aid, basic necessities, items for people with disabilities, and support during humanitarian emergencies, helping to improve the quality of life for children, families, and communities.

Main areas of social contribution:

- **Education and child welfare:** distribution of school kits and toys, promoting school retention, inclusion, and access to recreational spaces.
- **Support for vulnerable populations:** assistance to communities affected by emergencies, forced displacement, and adverse socioeconomic conditions.
- **Inclusion and disability:** provision of items that enhance the autonomy, well-being, and inclusion of people with disabilities.
- **Support for rural communities:** distribution of basic supplies and tools that help improve living conditions and local productivity.

Focus on Integrity and Transparency

All social contributions made through **Banca Gobierno** comply with the Bank's internal policies, including the guidelines of the **ABAC program**, and are aligned with our strategic focus on **social growth**. This allows us to ensure that our actions are carried out in accordance with criteria of legality, transparency, and accountability, and that they contribute to generating a **positive and sustainable impact** on society.

Key Impacts Generated by 2025

We allocated 1.175.523,400 COP in donations nationwide

- ✓ **Relevant population coverage:** positive impact on approximately **7.700 children aged 3 to 15** who are socially and economically vulnerable, in both urban and rural areas across different regions of the country.
- ✓ **Access to education and school retention:** distribution of **school kits, educational materials, and support for libraries**, contributing to improved access to education and reduced risk of school dropout in communities in socioeconomic strata **1, 2, and 3**.
- ✓ **Emotional well-being and social inclusion:** strengthening the emotional well-being and social inclusion of at-risk children, victims of armed conflict, and the migrant population through the distribution of toys, Christmas gifts, and recreational activities.
- ✓ **Comprehensive care for vulnerable communities:** support for communities affected by poverty, emergencies, and limited access to basic services through the distribution of food aid, hygiene kits, and essential items.

We directly impacted 19.888 beneficiaries

- ✓ **Inclusion of people with disabilities:** distribution of **wheelchairs and assistive devices**, improving the mobility, autonomy, and quality of life of people with disabilities and older adults.
- ✓ **Strengthening educational environments:** equipping and renovating educational institutions, combining **infrastructure, technology, volunteerism, and training** to create safe, modern, and suitable spaces for learning.
- ✓ **Wide territorial reach:** impacts across multiple departments and municipalities nationwide, including Bogotá, Valle del Cauca, Atlántico, Bolívar, Boyacá, Cauca, Caquetá, Huila, Meta, Nariño, La Guajira, Santander, Norte de Santander, Quindío, Tolima, San Andrés, Cesar, and Sucre, among others.
- ✓ **Fundación Educambio— Library Re-equipping:** provision of books with a differentiated approach, technological equipment, teaching materials, shelves made of recycled plastic, and training and follow-up processes, benefiting **120 people**.



- ✓ **Fundación Educambio— Donation of eco-books:** delivery of **500 eco-books** as part of the Cali Book Fair, with the proceeds allocated to strengthening community reading spaces in **Siloé and Llano Verde**, impacting **500 beneficiaries**.
- ✓ **Fundación Crack the Code:** Provision of technological equipment and training in **digital skills and artificial intelligence** for students and teachers at **20 educational institutions** in Valle del Cauca, benefiting **3.840 people**.
- ✓ **Biciclick S.A.S.:** Educational infrastructure improvements, beautification, and application of nanotechnology at a school in **Siloé (Cali)**, combining investment and volunteer work, benefiting **1.200 people**.

Regional Impact

During the reporting period, these social contributions reached different regions of the country, benefiting communities in both urban and rural areas. The distribution of contributions was carried out on a territorial basis, prioritizing the needs identified in each region and ensuring that resources reached the populations that needed them most in a timely manner.

Region	Departments included	Contribution	Beneficiaries
Northern Zone	Atlántico Bolívar Córdoba La Guajira Magdalena Sucre Cesar San Andrés, Providencia y Santa Catalina Guainía Guaviare Meta Caquetá	\$ 183.429.445 million in contributions	4.720 beneficiaries
Central Region	Antioquia Boyacá Caldas Cundinamarca Huila Santander Quindío Tolima	\$ 183.889.244 million in contributions	4.765 beneficiaries
Valle Region	Valle del Cauca Cauca Nariño	\$ 428.112.607 million in contributions	9.672 beneficiaries
Bogotá Area	Bogotá D.C.	\$ 28.709.510 million in contributions	731 beneficiaries





Consolidated impact in figures:

Taken together, the initiatives carried out throughout the year reflect Banco de Occidente's commitment to responsible social management, attuned to local realities and focused on generating sustainable value. Through social investment, volunteerism, strategic partnerships, and local contributions, we help improve the quality of life in the communities where we operate, building capacity, promoting inclusion, and creating positive impacts that extend beyond the short term.

This comprehensive approach allows us to move toward an increasingly structured and measurable social impact, consolidating our role as a stakeholder committed to sustainable development and the well-being of society.

Line of Action	Initiative / Program	Key Impact Indicators	2025 Targets
Territorial Development	Banco de Occidente — UNICEF Partnership (WASH Program)	Total Social Investment	\$223.881.446 COP*
		People Benefited	18.018 people**
		Women Benefited	6.126
		Men benefited	5.586
		Children and adolescents	6.810
		Water systems in operation	15
		Communities free of open defecation	11
		Hygiene kits distributed	5.500
		Schools strengthened with WASH services	46
		Health centers with WASH improvements	5
Corporate volunteering	Environmental and social volunteering	Volunteers mobilized	164 employees
		Workshops held	5 (3 environmental / 2 social)
		Volunteer hours	1.028
		Seedlings planted	440
		Children benefited (social volunteering)	40
Environmental education	Ecolibros Program	Ecolibros produced	19.500
		Ecolibros donated	550
		Children directly benefited	120
		Environmental education kits	3
		Funds raised for social initiatives	~\$4.000.000 COP
Community engagement	Planeta Azul Community	ECOS meetings held	2
		Participants	~100 people
		Exploratory partnerships formed	Multiple
Social Contributions	Toys, school supplies, social assistance	Children who received toys	6.519 boys and girls
		Toys distributed	5.353
		Investment in toy donations	\$244.330.000 COP
		Investment range per initiative	\$500.000 — \$8.000.000 COP

*The figures reported correspond to the 2024 UNICEF report



Acknowledgments

At Banco de Occidente, we know that sustainability cannot be achieved alone: it is built on trust, purpose, and the daily efforts of many people. In a challenging year, the constant support of our stakeholders drove us to keep moving forward with responsibility, empathy, and a vision for the future.

We thank our employees for their commitment; our customers for their trust; our shareholders for supporting our strategy; our suppliers and strategic partners for their outstanding collaboration; the communities for allowing us to grow alongside them; and the authorities for their guidance and ongoing coordination.

This report is our commitment to **transparency and accountability**: a way of sharing where we stand, what we have learned, and where we are headed. We will continue to contribute to a **more sustainable transition and to our blue planet**, convinced that every responsible decision counts and that the future is built better when we do it together. **Thank you for being part of this journey.**

Sustainability Management

Banco de Occidente S.A.

Content Writing Support

Ecoacciones S.A.S BIC

<https://ecoacciones.co/>

Design and layout

Mind Marketing S.A.S. of
Colombia.



Appendices





1. Assurance Letter



Sirs,
Shareholders and other stakeholders of
Banco de Occidente S.A.
Bogotá D.C., Colombia

Independent Practitioner's Limited Assurance Report

Scope

We have performed a limited assurance engagement over the information detailed in Appendix A of this document (hereinafter, the "information subject to assurance") of Banco de Occidente S.A. (hereinafter, the "Bank"), which will be included in the Management and Sustainability Report for the period from January 1 to December 31, 2025.

Our limited assurance engagement was performed solely with respect to the selected sustainability information included in Annex A. Our assurance report does not extend to information from prior periods nor to any other information in the Management and Sustainability Report not included in Annex A, nor to any other information related to that Report which may contain images, audio, or video content. Accordingly, we do not express a conclusion or any other form of assurance on such information.

Responsibility of Banco de Occidente S.A. Management

Management is responsible for preparing the information subject to assurance in accordance with the following applicable criteria effective in 2025:

- Global Reporting Initiative (GRI) Standards - Option of use: GRI-Referenced.
- Sustainability Accounting Standards Board (SASB) Standards for the Commercial Banks sector.
- Criteria of the Corporate Sustainability Assessment (CSA) questionnaire of S&P ESG - Sustainable1.
- Criteria defined by the Bank for the review of the current double materiality analysis.

Management is also responsible for selecting the applicable criteria used.

The preparation of the information subject to assurance requires Management to establish and interpret the criteria, determine the relevance of the information to be included, and make estimates and assumptions that affect the reported information. Management's selection of different, yet acceptable, measurement techniques, estimates, or assumptions could have resulted in materially different amounts or metrics. Obtaining sufficient and appropriate evidence to support our limited assurance conclusion does not reduce the inherent uncertainty in the amounts and disclosures.

Management is also responsible for the internal control it deems necessary to enable the preparation of the information subject to assurance that is free from material misstatement, whether due to fraud or error.

Our Independence and Quality Management

We have complied with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), together with the relevant ethical requirements in Colombia, and we have fulfilled the other applicable ethical responsibilities, which are based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

The firm applies the International Standard on Quality Management 1 (ISQM 1) - Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, which requires the firm to design, implement, and operate a system of quality management that includes policies or procedures related to compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Our Responsibility

Our responsibility is to express a limited assurance conclusion on the information subject to review, based on the procedures we have performed and the evidence we have obtained. We conducted our limited assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (IAASB). This standard requires us to conclude whether anything has come to our attention that causes us to believe that the information detailed in Annex A has not been prepared, in all material respects, in accordance with the applicable criteria.

A limited assurance engagement is substantially narrower in scope than a reasonable assurance engagement, both in terms of the risk assessment procedures—including the understanding of internal control—and in the procedures performed in response to the assessed risks.

Our engagement included, among others, the following procedures performed:

- Through inquiries, we obtained an understanding of the Bank's relevant control environment and information systems; however, we did not evaluate the design of specific control activities, nor did we obtain evidence regarding their implementation, nor did we test their operating effectiveness.
- Understanding of the tools used to generate, aggregate, and report the information subject to assurance through inquiries with those responsible for the related processes.
- Understanding, inquiry with management-designated representatives, and verification of the process carried out by the Bank in 2025 for the review of its double materiality analysis, including the participation of its stakeholders in this process.
- Interviews with Bank personnel to understand its business and the process for preparing the 2025 Management and Sustainability Report.
- Interviews with corporate-level Bank personnel responsible for the information to be reported, to understand the process for collecting, consolidating, and presenting the information subject to assurance.
- Verification of the calculation criteria and their appropriate application in accordance with the methodologies described in the criteria for the indicators subject to assurance, as defined in the scope indicated in Annex A.
- Performance of analytical procedures to support the reasonableness of the data.
- Comparison of the information presented in the Management and Sustainability Report with the corresponding underlying sources to determine whether such information has been included in the 2025 Management and Sustainability Report.



- Analysis of the data collection processes and internal controls over the quantitative information reflected in the Report, in terms of the reliability of the information, using analytical procedures and verification tests based on sampling.
- Reading of the information to be included in the 2025 Management and Sustainability Report to compare it against the criteria defined by GRI 1 - Foundations, GRI 2 - General Disclosures, and GRI 3 - Material Topics, applicable according to the declaration of use applied by the Bank. These procedures were performed based on the version of the Management and Sustainability Report provided by the Bank to BDO on March 10, 2026.
- Application of substantive procedures on a selective, random basis over the information subject to assurance, prepared by Management, to determine the standards and indicators and to corroborate that the data were measured, recorded, compiled, and reported appropriately through:

- Inspection of policies and procedures established by the Bank.
- Inspection of supporting documents from internal and external sources.
- Recalculations.
- Comparisons of the information presented by Management with what is established in the criteria referenced in this report.

The information subject to assurance included within the scope of our work is detailed in Annex A.

The procedures performed in a limited assurance engagement vary in nature and timing and are less extensive than those performed in a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

We consider that the evidence obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

Significant Inherent Limitations

The selected sustainability information is subject to inherent uncertainty due to the use of non-financial information, which is subject to greater inherent limitations than financial information, given the nature of the methods used to determine, calculate, sample, or estimate such information. In preparing the selected information, the entity makes qualitative interpretations regarding the relevance, materiality, and accuracy of the information, which are subject to assumptions and judgments.

Conclusion of Limited Assurance

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the information subject to assurance, as indicated in Annex A of

this report—and which will be included in the Bank's 2025 Management and Sustainability Report for the period from January 1 to December 31, 2025—has not been prepared, in all material respects, in accordance with the applicable criteria referenced in Annex A.

Other Matter

Our assurance engagement does not extend to information relating to prior periods.

Restriction on Use of This Report

This report is issued exclusively for the purpose described in the first paragraph and must not be used for any other purpose nor distributed separately to other parties. This report relates solely to the matters addressed in the preceding sections and the information subject to assurance included in Annex A, and does not extend to any other financial or non-financial information included in the Bank's Management and Sustainability Report for the period from January 1 to December 31, 2025, nor to its financial statements taken as a whole.

Action Plans

BDO Audit S.A.S BIC provides the Bank, through an additional report, with recommendations for the future preparation of the Management and Sustainability Report. These recommendations do not modify the conclusion expressed in this report and are intended to strengthen the Bank's processes for developing, managing, measuring, reviewing, reporting, and communicating its sustainability indicators.

Jaime Vargas
Audit and Assurance Partner
Certified Public Accountant TP 81100

Member of
BDO Audit S.A.S BIC
Bogotá D.C., March 12, 2026.



ANNEX A

Below is the detailed description of the assurance criteria and the qualitative and quantitative information subject to assurance, which form an integral part of our independent limited assurance report on the Management and Sustainability Report of Banco de Occidente S.A. for the period from January 1 to December 31, 2025.

A.1. Scope of the Limited Assurance – Quantitative Information

GRI Standard	DJSI-CSA	Description	Value
201-1	N/A	Direct economic value generated and distributed	Economic value generated: COP 3,837.81 billion Economic value distributed: COP 2,314.18 billion Economic value retained: COP 1,523.70 billion
302-1	Dow Jones 2.1.1 - CSA	Energy Consumption	10,332.87 MWh
303-5	Dow Jones 2.3.1 - CSA	Water Consumption	39,786.15 m3
306-4	Dow Jones 2.2.1 - CSA	Waste Disposal	246 t
306-5	Dow Jones 2.2.1 - CSA	Waste not destined for disposal	4.65 t
305-1	Dow Jones 2.4.1 - CSA	Direct Greenhouse GHG Emissions (Scope 1)	886.86 tCO2e
305-2	Dow Jones 2.4.2 - CSA	Indirect Greenhouse GHG Emissions (Scope 2)	1,002.48 tCO2e
305-3	Dow Jones 2.4.3 - CSA	Indirect Greenhouse GHG Emissions (Scope 3)	3,114.11 tCO2e
305-4	Dow Jones 2.5.2 - CSA	Other Indirect GHG emissions (Scope 3) Scope 3 Financed Absolute Emissions	0.71 tCO2e
405-2	Dow Jones 3.1.6 - CSA	Gender Pay Indicators	Senior Management: 85,400 Middle Management: 4,200 Lower Management: 6,600 Functional Areas: 19,900 Women: 1,690 Men: 2,580

SASB Standard	DJSI-CSA	Description	Value
SASB FN-CB-240a.1	N/A	(1) Number and (2) amount of outstanding loans qualified for programs designed to promote small businesses and community development	Number of outstanding loans qualified for programs designed to promote small businesses and community development: 16,503 Amount (COP) of total qualified loans for programs designed to promote small businesses and community development: COP 3,785,713,536,584
SASB FN-CB-240a.2	N/A	(1) Number and (2) amount of past due and nonperforming loans qualified for programs designed to promote small businesses and community development	Number of past-due loans qualified for programs designed to promote small businesses and community development: 1,610 Amount (COP) of past-due loans qualified for programs designed to promote small businesses and community development: COP 305,208,975,389



SASB Standard	DJSI-CSA	Description	Value
			and community development: 2,385 Amount (COP) of non-performing loans qualified for programs designed to promote small businesses and community development: COP 342,460,303,330
SASB FN-CB-230a.1	N/A	Information Security	Number of data breaches by Banco de Occidente: 0 Percentage of those breaches that involved Personally Identifiable Information (PII): 0 Number of account holders affected by such breaches: 0
SASB FN-CB-510a.1 / FN-AC-510a.1	N/A	Total amount of monetary losses as a result of legal proceedings	COP 1,362,366,725
SASB FN-AC-330a.1	N/A	Percentage of (1) gender and (2) representation of diverse groups in (a) executive management, (b) non-executive management, (c) professionals, and (d) all other employees	Black or African American: 245 employees (3.47%) Mestizo, Hispanic or Latino: 5,895 employees (83.57%) Indigenous or Native: 90 employees (1.28%) LGBTIQ+: 157 employees (2.23%) Other: 667 employees (9.46%)

CSA S&P Question	Description	Value
Dow Jones 3.4.3. - CSA	Absenteeism Rate	Total HHT (Hours/Days Lost): 13,882,272 Occupational accidents: 42 Occupational diseases: 6
	Abseteeism Rate	Accident Frequency Rate (AFR / IFA): 0.60% Accident Severity Rate (ASR / ISA): 1.67%

A.2. Scope of the Limited Assurance – Qualitative Information

SASB Standard	DJSI-CSA	Description
403-1	Dow Jones 3.4.2 - CSA	OHS Programs Occupational Health and Safety Management System The information reported regarding the Occupational Health and Safety Management System was verified. The organization has implemented policies, guidelines, and procedures that are consistent with the information presented in the report.
403-2	Dow Jones 3.4.2 - CSA	OHS Programs Hazard Identification, Risk Assessment, and Incident Investigation The information disclosed regarding the processes for hazard identification, risk assessment, and incident investigation was reviewed. The organization has procedures and management mechanisms in place that are consistent with the information reported in the document.

SASB Standard	Description
SASB FN-CB-510a.2	Description of Policies and Procedures for Reporting Irregularities Assured "Culture of Integrity" GRI 2-26; SASB FN-CB-510a.2. At the Bank, we manage ethics and compliance as part of our daily operations, through clear rules and mechanisms that enable

text:



timely action. To this end, we have a Code of Ethics and Conduct and an Internal Work Regulation. Upon joining the Bank, and each time these documents are updated, all employees sign a conduct and compliance commitment, reaffirming the standards that guide our way of working.

When a situation is identified that may represent a breach of these standards, employees have the duty to report it through the defined channels, as appropriate: their immediate supervisor, the Human Talent Vice-Presidency, the Internal Audit Management Office, the Compliance Management Office, or the Banking Security Management Office. This framework strengthens our control culture and risk mitigation, and supports the trust of clients, shareholders, and other stakeholders.

Furthermore, we believe in equality as a right and equity as a guiding principle of our organizational identity. In our labor relations, we promote a discrimination free environment, and during the reporting period, no cases of this nature were recorded."

CSA S&P Question Description

Crime Prevention: Business Policy/ Procedures

Crime Prevention: Corporate Policy and Procedures

Assured text:

During 2025, we continued safeguarding one of the Bank's most important assets: trust. We reaffirmed our commitment to transparency, financial security, and the protection of our clients against risks associated with fraud and other practices that may compromise the integrity of the system. To this end, we maintained and strengthened prevention, detection, and incident-management strategies aligned with regulatory standards and industry best practices. Our approach combines preventive actions with timely response measures, not only to protect clients but also to contribute to the stability of the financial system—one of the key pillars of our sustainable management.

By promoting a secure and trustworthy environment, we strengthen market confidence and facilitate financial inclusion, ensuring that more individuals and businesses can access financial services under safe conditions. To maintain these results, we operate under internal controls and compliance policies that reinforce the prevention of misconduct and the mitigation of risks. This management is grounded in principles of integrity, transparency, and accountability, and seeks to ensure that employees, clients, and strategic partners operate within a trustworthy financial environment fully aligned with applicable regulations.

In parallel, we have specific mechanisms for managing legal risk, enabling us to monitor and anticipate situations that may result in litigation. When we receive notification of a legal proceeding, a report is immediately sent to the Operational Risk area for analysis, follow-up, and the definition of mitigation measures.

Dow Jones 1.5.3 -
CSA

At Banco de Occidente, we operate under strong ethical principles, understanding that integrity is not only a compliance requirement but the foundation of trust and the way we conduct business. This commitment contributes to building a more equitable society and a more transparent economic system, fostering responsible practices that reinforce our values across the organization. This approach is supported by our Internal and External Fraud Management Process Policy and forms part of the ABAC program. Our Fraud Management Process Policy and the associated compliance initiatives aim to prevent and mitigate legal and financial risks while strengthening market confidence and relationships with our stakeholders.

We implement rigorous internal controls; conduct periodic training on corporate values and business ethics for our employees; develop awareness activities for suppliers to promote a culture of integrity across the value chain; and provide confidential reporting channels that facilitate the timely detection and management of any irregularities. In this way, we consolidate a transparent business environment aligned with our ESG strategy and continuously improving to address the challenges of a demanding and constantly evolving regulatory landscape.

The ABAC policy also enables us to prioritize activities that, due to their nature, may involve greater exposure to corruption risk. These include donations, sponsorships, contributions to social programs under the sustainability model, the acceptance and/or offering of gifts and invitations, public or political contributions, and merger or acquisition processes.

Oversight of this management is carried out by the management teams under the Risk and Collections Vice-Presidency, which report results to the various committees. Furthermore, the Board of Directors' Comprehensive Risk Committee (CIR)—chaired by an independent member—meets quarterly to supervise management, monitor the risk profile, and verify that policies and procedures remain adequate. The CIR also advises the Board of Directors on operations, events, or activities that may affect risk exposure and profile, approves adjustments to the SIAR, and promotes continuous monitoring of risk culture.

The Compliance Officer oversees the risk of money laundering and reports directly to the President, presenting detailed reports to the Board of Directors each quarter.

Independent Audits and Evaluation

Annually, KPMG performs an internal audit of the management of the different types of risks. The results of these audits have generally been satisfactory; when improvement opportunities are identified, each risk specialty develops action plans to address gaps, which are monitored and reported to the corresponding committees. In addition, our Holding has a Corporate Comptroller's Office that periodically evaluates the risk management processes of the various entities.



CSA S&P Question Description

Privacy Policy: Systems/ Procedures

Assured text:

Communication to clients regarding privacy and data protection

For us, transparency is also a form of protection. Therefore, we inform our clients clearly and in a timely manner about our Personal Data Processing Policy, which is available for consultation on our institutional website. Additionally, when a security incident occurs that may compromise personal data, we activate the necessary mechanisms to inform potentially affected clients, in compliance with Law 1581 of 2012 and under an approach centered on care and timeliness.

Regulatory compliance and normative reference

Dow Jones 3.7.1 -
CS

- In matters related to personal data, we conduct our management in alignment with Law 1581 of 2012, strengthening practices for the responsible processing of information.

- To guide our model and ensure consistency, we use recognized frameworks such as ISO 27001:2022 and NIST (v2.0) as reference points. These frameworks help us evaluate and enhance our capabilities without relying solely on formal certification.

External assessments and monitoring

- To complement our internal management, we conduct assessment exercises: in 2024, we shared the results of an external evaluation performed by EY.

- During 2025, we advanced in an evaluation with Deloitte, which was still in progress at the close of the reporting period, as part of our effort to understand our maturity level, prioritize gaps, and strengthen action plans.

Critical third parties: compliance verification

- Although we do not perform vulnerability analyses on third parties using internal Bank tools, we do carry out compliance verification visits to critical third parties in information security and cybersecurity, with support from Incocrédito, including questions related to vulnerability management.

Concept	Procedure Applied by the Bank	Scope of BDO's Limited Assurance
---------	-------------------------------	----------------------------------

Verification procedures were performed through observation, inquiry, and inspection of documentation related to the review of the methodology defined by the Bank for its double materiality analysis in effect since 2023, which resulted in the consolidation of the initial 26 topics into 13 priority topics. Once the list of priority topics was defined, the Bank implemented the following steps:

- Adjustment of analytical parameters in an Artificial Intelligence (AI) tool used by the consultant to ensure that the assessment appropriately considered suppliers, peers, and sectors relevant to the Bank's key portfolio.
- Integration of the results from the double materiality analysis performed in 2023, ensuring continuity and comparability.
- A survey addressed to the Vice Presidents to obtaining an updated and strategic perspective on institutional priorities.

These procedures enabled a more structured review of the most relevant ESG matters within the current business context and its operating environment, thereby supporting alignment between the sustainability strategy and the Bank's organizational purpose.

ANNEX B
Bank's 2025 Management and Sustainability Report



2. ESG Table

General Content — GRI 2					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	2-1 Organizational details	Organizational details: (a) Legal name of the organization: Banco de Occidente (b) Nature of ownership and legal form: Banco de Occidente (c) Location of headquarters: Cali, Cra. 4 #7 – 61 (d) Countries in which it operates: Colombia, Panama, and Barbados Banco de Occidente is a privately held financial institution. No government entity or organization linked to state activities holds a stake in the company. The principal shareholder is Grupo Aval Acciones y Valores S.A., which as of December 31, 2025, held a 72,27% stake.	9		→ Ethical Commitment and ESG Governance
GRI	2-2 Entities included in the sustainability reporting.	ESG disclosures focus on Banco de Occidente S.A. The subsidiaries—Fiduoccidente, Banco de Occidente de Panamá, Occidental Bank Barbados, and Nexa BPO—are not currently included within the scope of reporting on environmental, social, or climate indicators. The Bank continues the evaluation process to progressively expand coverage, strengthening methodological consistency, comparability, and transparency of reporting at the Group level.	9		→ Ethical Commitment and ESG Governance
GRI	2-3 Reporting period, frequency, and contact point.	Reporting period: 2025 Frequency: Annual Contact point for questions about the report or the information reported: Sustainability Manager: Daniel López – dflopezs@bancodeoccidente.com.co	9		→ Ethical commitment and ESG governance
GRI	2-4 Information update.	In 2025, there were no restatements of information or data from previous reporting periods.	9		→ Ethical commitment and ESG governance
GRI	2-5 External verification	The 2025 Management and Sustainability Report includes a limited-scope independent external assurance conducted by BDO Colombia S.A.S. The assurance letter and details of the scope are available in the report’s appendices, confirming the quality and reliability of the information disclosed.	272 – 274		→ Ethical Commitment and ESG Governance



General Content — GRI 2

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	2-6 Operations, value chain, and other business relationships	The Bank has a documented profile of its supply chain, published in the 2025 Sustainability Report, which supports the management of ESG risks associated with suppliers and third parties. Chapter: Responsible Growth and Comprehensive Risk Management; Responsible Supply Chain Management.	17, 20, 24		→ Responsible supply chain management
GRI	2-7 Total employees by gender and region	Of our 7.054 employees, 6.179 have permanent contracts and 723 have fixed-term contracts. Additionally, we have 152 apprentices and interns, for a total of 7.054 employees, all of whom are full-time. Furthermore, the total number of temporary and outsourced employees amounts to 2.200, and we do not have any staff working under a non-guaranteed hours arrangement. The methodology used is full-time equivalent (FTE)	218		→ Talent Management
GRI	2-8 Non-employee workers	In 20254, we had 2.200 outsourced workers performing various functions, including telephone sales and digital channel management, technical support, general services, and security. Their contractual relationship is through third-party providers specializing in each area.	200		→ Talent management
GRI	2-9 Governance Structure and Composition	https://www.bancodeoccidente.com.co/quienes-somos/informacion-inversionistas#uvcr 2025 Management Report/Investor Information/Corporate Governance/Board of Directors	132-134		→ Ethical Commitment and ESG Governance
GRI	2-10 Nomination and selection of the highest governance body	Strong Governance and Ethical Leadership	134		→ Ethical Commitment and ESG Governance
GRI	2-11 Chair of the highest governance body	Strong Governance and Ethical Leadership Board of Directors			→ Ethical commitment and ESG governance
GRI	2-12 Role of the highest governance body in overseeing impact management	Strong Governance and Ethical Leadership – Board of Directors – Sustainability Committee – Senior Management: Ángela Maria Ceballos, Vice President of Human Resources and Administration at Banco de Occidente, is responsible for managing and implementing the sustainability strategy and reports directly to the President of Banco de Occidente.	139		→ Ethical Commitment and ESG Governance



General Content — GRI 2

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	2-13 Delegation of responsibility for impact management	The Bank has a Sustainability Committee that meets quarterly and is composed of members of senior management. This Committee monitors the material issues defined in the sustainability strategy.	145		→ Ethical commitment and ESG governance
GRI	2-14 Role of the highest governance body in the preparation of sustainability reports	The Management Report and related documents of for the year 2025 were approved by the Board of Directors.	139		→ Ethical Commitment and ESG Governance
GRI	2-15 Conflicts of Interest	Chapter: Strong Governance and Ethical Leadership Subchapter: Corporate Governance Structure Section: Conflict of Interest	148		→ Ethical Commitment and ESG Governance
GRI	2-16 Reporting of Critical Concerns	Chapter: Strong Governance and Ethical Leadership Subchapter: Corporate Governance Structure Section: Board Information Management	143		→ Ethical Commitment and ESG Governance
GRI	2-17 Collective expertise of the highest governance body	Chapter: Strong Governance and Ethical Leadership Subchapter: Corporate Governance Structure Section: Resumes of the Members of the Board of Directors 2025—2026	141		→ Ethical Commitment and ESG Governance
GRI	2-18 Assessment of the performance of the highest governance body	Chapter: Strong Governance and Ethical Leadership Subchapter: Corporate Governance Structure Section: Evaluation of the Board of Directors	142		→ Ethical Commitment and ESG Governance
GRI	2-19 Compensation Policies	Chapter: Strong Governance and Ethical Leadership Subchapter: Corporate Governance Structure Section: Board of Directors Compensation Policy	142		→ Talent Management



General Content — GRI 2

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	2-20 Process for determining compensation	Chapter: Strong Governance and Ethical Leadership Subchapter: Corporate Governance Structure Section: Board of Directors' Compensation	143		→ Talent Management
GRI	2-21 Total Annual Compensation Ratio	The Bank discloses the annual total compensation ratio and related detailed information through corporate microsites, ensuring transparency and access to information, in line with S&P Global's corporate governance and disclosure standards.	214	x	→ Talent Management
GRI	2-22 Statement on Sustainable Development Strategy	Message from Gerardo Silva Castro — CEO of Banco de Occidente	11		→ Ethical Commitment and ESG Governance
GRI	2-23 Policy Commitments	Policy Commitments: (a) Policy Commitment to Responsible Business Conduct: Banco de Occidente website: https://www.bancodeoccidente.com.co/sostenibilidad – Code of Ethics and Conduct – Board of Directors Regulations – Human Rights Policy – Environmental and Climate Change Policy	161		→ Ethical Commitment and ESG Governance
		b) Specific policy on respecting human rights: Banco de Occidente website: https://www.bancodeoccidente.com.co/sostenibilidad – Sustainability Policy – Human Rights Policy – Environmental and Climate Change Policy	223		
		(c) Link to the commitment policies if they are public; if not, please explain why: all of our ESG policies are published on the Banco de Occidente website: https://www.bancodeoccidente.com.co/sostenibilidad	200		



General Content — GRI 2

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI		(d) Indicate the level at which each commitment policy was approved within the organization, including if this is the highest level: ESG policies are approved by the Sustainability Committee, the highest decision-making body in this area, with the participation of members of the Board of Directors, which ensures strategic oversight and alignment with corporate governance.	145		→ Ethical Commitment and ESG Governance
		(e) Report to what extent the engagement policies apply to the organization’s activities and its business relationships: The policies apply to 100% of the activities carried out by the Bank. See: Appendix 3 TCFD Report and Management and Sustainability Report at https://www.bancodeoccidente.com.co/sostenibilidad	App.		
		(f) Describe how the policy’s commitments are communicated to employees, business partners, and other relevant stakeholders: ESG commitments are communicated through ESG results, strategic sustainability initiatives, stakeholder engagement, and formal communication channels, ensuring their dissemination and adoption both internally and externally.	200		
GRI	2-24 Integration of commitments and policies	ESG Results – Ethics and Compliance – Human Rights https://www.bancodeoccidente.com.co/sostenibilidad	157		→ Ethical Commitment and ESG Governance
GRI	2-25 Processes to address negative impacts	ESG Results – Ethics and Compliance – Human Rights https://www.bancodeoccidente.com.co/sostenibilidad – Human Rights Policy: Contact Channels. Banco de Occidente Contact Lines – Ethics Hotline. – Email: servicio@bancodeoccidente.com.co – National Hotline: 018000514652 – Workplace Environment: ambientelaboral@bancodeoccidente.com.co – Aval Ethics Hotline – Financial Consumer Ombudsman	150		→ Ethical Commitment and ESG Governance → Respect for human rights



General Content — GRI 2

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	2-26 Mechanisms for Seeking Advice and Raising Concerns	The Bank has an ethics hotline available to employees, customers, shareholders, and suppliers, which allows for anonymous reporting of fraud, corruption, ML/TF, or other misconduct, thereby strengthening the internal control system and the culture of compliance. https://www.bancodeoccidente.com.co/wps/portal/banco-de-occidente/bancodeoccidente/footer/otros/linea-etica National Hotline: 018000514652	161	x	→ Ethical Commitment and ESG Governance
GRI	2-27 Compliance with Laws and Regulations	Regarding the Issuer’s litigation and judicial or administrative proceedings, we report only those cases of non-compliance that are material to the organization, as established in Circular 012 of the Financial Superintendency. During the reporting period, there were no instances of material non-compliance with applicable laws or regulations. Consequently: i. Cases resulting in fines: 0 ii. Cases resulting in non-monetary sanctions: 0	152-157		→ Ethical commitment and ESG governance
GRI	2-28 Membership in associations	Chapter: Our Bank and Its Commitment Section: Key Memberships and Affiliations Chapter: Strong Governance and Ethical Leadership Subsection: Ethics and Transparency Section: Membership in Associations Details of Major Contributions Asobancaria: active participation in regulatory issues and the sustainability of the financial sector \$1.010.495.766 ANIF: support in the analysis of economic and financial policies: \$289.905.600 ANDI: collaboration on competitiveness and business development initiatives: \$188.813.000 Total increase in contributions and expenses: \$1.489.214.366	23, 163		→ Ethical commitment and ESG governance
GRI	2-29 Approach to stakeholder engagement	ESG Results – Our Stakeholder Groups – Mechanisms and Channels for Engaging with Our Stakeholders – Double Materiality	164		→ Talent Management → Engagement with our communities



General Content — GRI 2

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	2–30 Collective Bargaining Agreements	38% of employees are covered by a collective bargaining agreement. For employees not covered by such agreements, working conditions are governed by the Salary Policy and the Compensation Policy, which define benefits and allowances, ensuring consistency and fairness in labor management.	218		→ Talent Management → Respect for human rights

Material Topics — GRI 3

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	3–1 Process for determining material topics	Our ESG Results – Materiality Analysis (a) Describe the process you have followed to determine your material topics This is based on a methodology in which Environmental, Social, and Governance (ESG) issues relevant to the bank were first prioritized, followed by an analysis of 147 companies in the sector. Based on this analysis, Impacts, Risks, and Opportunities (IROs) were identified, and internal and external perspectives were integrated. (b) Specify the stakeholders and experts whose opinions have informed the process of determining your material topics. • Shareholders • Customers • Senior management • Board of Directors • Employees • Communities • Strategic partners • Suppliers • Trade associations	119 – 128		→ Ethical commitment and ESG governance



Material Topics — GRI 3

Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	3-2 List of material topics	(a) List the material topics identified during the process of defining the report’s content. Materiality of impact Prioritized material topics: • Emissions management and climate change • Protection of biodiversity and ecosystems • Operational eco-efficiency • Commitment to our communities • Respect for human rights • Memorable customer experience • Responsible marketing • Talent management • Diversity and inclusion • Ethical commitment and governance • Responsible supply chain management • Information security, cybersecurity, and system availability • Sustainable finance • Technology and digital transformation (b) Report changes in material issues compared to previous reporting periods: the scope, coverage, or valuation methods applied in the report. In 2025, an update to the dual materiality framework was conducted; the IROs were updated through a comprehensive mapping of risks and opportunities, taking into account other companies in the same sector and the bank’s internal operations. Additionally, surveys were conducted with vice presidents, including key questions.	119 – 128		→ Ethical commitment and ESG governance
GRI	3-3 Management of Material Issues	Chapter: Sustainability: Creating Shared Value Subchapter: ESG Strategy and Its Impact Section: Materiality Analysis	119 – 128		→ Ethical Commitment and ESG Governance



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	201-1 Direct economic value generated and distributed	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: We Generate Profitable and Sustainable Growth Section: Economic Value Generated and Distributed In 2025, the Bank maintained the same HC-ROI calculation methodology used in the 2024 Management Report, in line with DJSI guidelines and current accounting standards. This methodology considers total revenue, operating expenses, and employee-related expenses. Based on this methodology, HC-ROI reached a value of 3,76 in 2025. This result remains within a consistent range compared to previous years and, although it shows a slight decrease from 2024 (3,91), reflects stability in the efficiency of human capital utilization and the continuity of strategies focused on productivity, labor cost optimization, and the strengthening of talent management, in line with international sustainability standards.	43	x	→ Ethical Commitment and ESG Governance
	201-2 Financial implications and other risks and opportunities arising from climate change	The Bank includes in its TCFD report the identification and disclosure of financial risks and opportunities associated with climate change, strengthening the integration of climate risk into financial management, decision-making, and the assessment of impacts on the portfolio.	App. TCFD		→ Emissions management and climate change
GRI	203-2 Significant indirect economic impacts	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Financial Overview and Stock Market Performance Section: Macroeconomic Overview	37		→ Commitment to Our Communities
GRI	GRI 204-1 Percentage of spending on local suppliers	Chapter: Responsible Growth and Comprehensive Risk Management; Subchapter: Responsible Supply Chain Management: Percentage of Spending on Local Suppliers. Total payments to local suppliers amounted to \$1.244.338.492.959, and 99% of our suppliers were local.	115		→ Responsible Supply Chain Management
GRI	415-1 Contributions to political parties and/or politicians	In 2025, the Bank did not make any financial contributions to political campaigns, lobbying activities, or electoral processes, nor did it engage any lobbying groups, in accordance with its Code of Ethics and the criteria of the S&P Global Corporate Assessment.	163		→ Ethical commitment and ESG governance



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	FN-CB-410a.2 Description of the approach to incorporating environmental, social, and corporate governance (ESG) factors into credit analysis	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Environmental and Social Risk Management System (SARAS)	85		→ Sustainable Finance
SASB	FN-CB-550a.2. Description of the approach to incorporating the results of mandatory and voluntary tests into capital adequacy planning, long-term strategy, and other business activities	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Fiscal and Tax Management Section: Market Risk; Stress Testing	82		→ Sustainable Finance



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
SASB	FN-CB-240a. (1) Number and (2) amount of outstanding loans eligible for programs designed to promote small businesses and community development	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Promoting Sustainable Businesses Section: Financial Inclusion in SMEs: Credit Access and Portfolio Quality	99	X	→ Sustainable Finance
SASB	FN-CB-240a.2: (1) Number and (2) amount of past-due and non-performing loans eligible for programs designed to promote small businesses and community development	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Promoting Sustainable Businesses Section: Financial Inclusion in SMEs: Credit Access and Portfolio Quality	99	X	→ Responsible Marketing
SASB	BdO-1 Total Digital Sales	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Information Security, Cybersecurity, and System Availability Section: Digital Transformation; Digital Sales.	104		→ Responsible Marketing
Propio	205-1 Operations assessed for corruption-related risks	Chapter: Strong Governance and Ethical Leadership Subchapter: Ethics and Transparency	157		→ Ethical Commitment and ESG Governance



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	205–2 Communication and training on anti–corruption policies and procedures	Chapter: Strong Governance and Ethical Leadership Subchapter: Ethics and Transparency	157		→ Ethical Commitment and ESG Governance
GRI	205–3 Confirmed incidents of corruption and actions taken	Chapter: Strong Governance and Ethical Leadership Subchapter: Ethics and Transparency	157		→ Ethical Commitment and ESG Governance
GRI	206–1 Legal actions related to unfair competition, monopolistic practices, and anti–competitive conduct	Chapter: Strong Governance and Ethical Leadership Subchapter: Ethics and Transparency	157		→ Ethical commitment and ESG governance
GRI	207–1 Tax Approach	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Fiscal and Tax Management Section: Fiscal Approach	59 – 63		→ Ethical Commitment and ESG Governance
GRI	207–2 Fiscal governance, control, and risk management	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Fiscal and Tax Management Section: Fiscal Governance, Control, and Risk Management	59 – 63		→ Ethical Commitment and ESG Governance
GRI	207–3 Stakeholder engagement and management of their concerns regarding tax matters	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Fiscal and Tax Management Section: Stakeholder Engagement and Management of Concerns Regarding Tax Matters	59 – 63		→ Ethical Commitment and ESG Governance



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	207-4 Country-by-country reporting	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Fiscal and Tax Management Section: Country-by-Country Reporting	59 – 63		→ Ethical Commitment and ESG Governance
GRI	FN-CB-230a.1 (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	Chapter on Responsible Growth and Comprehensive Risk Management, we have a section titled "Information Security, Cybersecurity, and System Availability" In 2025, the bank did not experience any data breach incidents or accidents; however, one of its suppliers did: there was a data breach incident involving a vendor acting as the processor of the bank’s customer database, which suffered a ransomware attack; 26.533 pieces of customer personal data were compromised. As a corrective measure, direct communication between the vendor and the bank was suspended until the vendor was certified as secure, and the internal security protocol and crisis management team were activated.	107	X	→ Information security, cybersecurity, and system availability
SASB	FN-CB-230a.2 Description of the approach to identifying and addressing data security risks	Cybersecurity Our management is supported by an information security framework that brings together guidelines, practices, and controls to protect our clients’ and the Bank’s information. To remain aligned with recognized best practices, we use international standards such as ISO 27001:2022, NIST 800-53 (v2.0), and local regulations such as the regulatory circulars issued by the Colombian Financial Superintendency regarding compliance with security and cybersecurity controls. We periodically review our approach to adapt it to changes in the environment and the evolution of our digital services. We also test our capabilities. We complement our internal audit and corporate compliance functions with assessment exercises that help us identify opportunities for improvement and prioritize actions. In recent processes, we shared the results of an external assessment conducted in 2024 with the consulting firm Ernest & Young (EY), and during 2025 we made progress on a new assessment with Deloitte, which was ongoing at the end of the period. Under the leadership of the Vice Presidency of Operations and Technology, together with the Vice Presidency of Risk, technical and risk management teams are coordinated, taking into account the risk assessment model (ANX-APY-1186). Monthly follow-ups are managed with the Information Security Committee, guided by the principle of continuous improvement. In 2025, we strengthened our prevention efforts with a simple principle: “the earlier we identify a risk, the lower its impact.” That is why we combine controls, monitoring, and continuous improvements to protect information and maintain the stability of our services. This approach allows us to act before a threat becomes an incident and to support the growth of our digital channels with confidence.	107 – 108		→ Information security, cybersecurity, and system availability



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
SASB	FN-CB-510a.1 Total amount of monetary losses resulting from legal proceedings related to fraud, insider trading, antitrust, unfair competition, market manipulation, malpractice, or other relevant laws or regulations in the financial industry	Litigation, legal, and administrative proceedings During the reporting period, the total amount of monetary losses associated with legal proceedings for fraud amounted to COP 1.362.366.725, related to 50 lawsuits in 2025, rulings involving social engineering fraud, malware, phishing websites, SIM portability/swapping, and product and card impersonation.	153	X	→ Ethical commitment and ESG governance
SASB	FN-CB-510a.2 Description of whistleblowing policies and procedures	Chapter: Strong Governance and Ethical Leadership Subchapter: Regulatory and Legal Compliance Section: Culture of Integrity	161	X	→ Ethical Commitment and ESG Governance



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
SASB	FN-CB-550a.1 Score in the Global Systemically Important Bank (G-SIB) assessment, by category	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Strategic Management of Financial and Non-Financial Risks Section: Global Systemically Important Banks In accordance with Circular Letter 068 of 2025 from the Financial Superintendency of Colombia (SFC) and in compliance with paragraph 2.1.1.4.3 of Decree 2555 of 2010, the SFC published the list of Systemically Important Institutions (SIIs) for fiscal year 2026, based on the methodology defined for their identification. For this calculation, information as of June 30, 2025, submitted to the Financial System Coordination and Monitoring Committee, was used. With these results, we ranked third, with a score of 9,58%, above the threshold of 6,45%, meaning that for the first time we were considered a systemically important bank. It is important to note that this classification does not represent a risk assessment or rating of the institutions. In this context, the Bank must continue to build the additional buffer for systemic institutions, equivalent to 1% of assets weighted for credit, market, and operational risk, in accordance with the instructions and deadlines issued by the SFC in Resolution No. 2629 of December 27, 2024.	84		→ Ethical Commitment and ESG Governance
GRI	101-1 Policies to Halt and Reverse Biodiversity Loss	Chapter: Action for the Planet Subchapter: Protection of Biodiversity and Ecosystems Section: Policies to Halt and Reverse Biodiversity Loss	191 – 197		→ Protection of biodiversity and ecosystems
GRI	101-3 Access and sharing of benefits	Chapter: Action for the Planet Subchapter: Protection of biodiversity and ecosystems Section: Access and Benefit-Sharing	191 – 197		→ Protection of biodiversity and ecosystems
GRI	101-4 Identification of impacts on biodiversity	Chapter: Action for the Planet Subchapter: Protection of biodiversity and ecosystems Section: Identification of impacts on biodiversity	191 – 197		→ Protection of biodiversity and ecosystems



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
SASB	302–1 Energy consumption within the organization	Energy management (a) Energy consumption sources from non-renewable fuels are: gasoline and diesel. (b) Sources of renewable fuel consumption come from electricity and solar panels. (c) Total energy consumption in 2025 amounts to 10.616,90 MWh (38.220,84 GJ), broken down as follows: 85,94 MWh (309,38 GJ) from non-renewable sources, 10.332,87 MWh (37.198,33 GJ) from electricity, and 198,09 MWh (713,12 GJ) from renewable sources. (d) Internal energy consumption is reported in the Energy Management section. (f) The Energy Master tool is used to upload office bills and consolidate consumption data. (g) Emission factors provided by the National Interconnected System (XM), the UPME, and the IPCC’s global warming potentials are used.	177 – 180	X	→ Operational eco-efficiency
GRI	302–3 Energy intensity	Chapter: Action for the Planet Subsection: Operational Eco-efficiency Section: Energy Management; Energy Intensity (a) Energy intensity ratio for the organization. Energy intensity in 2025 was 1,51 MWh per employee. (b) Organization-specific metric (the denominator) chosen to calculate the ratio. The metric chosen was MWh. (c) Types of energy included in the intensity ratio Gasoline, diesel, electricity, and solar panels were considered.	177 – 180		→ Operational eco-efficiency



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	302–4 Reduction of Energy Consumption	Chapter: Action for the Planet Subchapter: Operational eco–efficiency Section: Energy Management; Energy Efficiency and Conservation Projects (a) Amount of energy consumption reductions achieved as a direct result of conservation and efficiency initiatives, in kilowatt–hours or multiples thereof. In 2025, 664,2 MWh (2.391,1 GJ) were reduced compared to 2024 and 2.093,1 MWh compared to the 2022 baseline (b) Types of energy included in the reductions Gasoline, diesel, electricity, and solar panels were considered. (c) Basis for calculating reductions in energy consumption, such as the base year or baseline, including the rationale for selecting it. The year 2022 is the baseline (d) Standards, methodologies, assumptions, and/or calculation tools used. The tool used is Energy Master, which references ISO 50001 without strictly adhering to it in its entirety; it is based on using actual meter readings and collecting consumption invoices from energy usage points.	177 – 180		→ Operational eco–efficiency
GRI	303–5 Water consumption	Chapter: Action for the Planet Subchapter: Operational Eco–efficiency Section: Water Resource Management; Water Consumption a. Total water consumption (in megaliters) across all regions. In 2025, 0,0398 million m³ (39,8 ML) were consumed b. Total water consumption (in megaliters) across all water–stressed areas. 0,0139 million m³ (13,9 ML) c. Change in water storage (in megaliters), provided that water storage has been identified as having a significant impact in relation to water. In 2025, data collection coverage was expanded, so consumption may appear to have increased, but this is due to the addition of the location d. Any contextual information necessary to understand how the data were collected (such as standards, methodologies, and assumptions used), as well as whether the information is calculated, estimated, derived from a model, or obtained from direct measurements, and the method employed. Energy Master is used	180	BDEO	→ Operational eco–efficiency



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	305–1 Direct GHG Emissions – Scope 1	a. The gross value of direct GHG emissions (Scope 1) in metric tons of CO2 equivalent. For the year 2025, this was 886,86 tCO2eq b. The gases included in the calculation: CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all of them. CO2, CH4, N2O, SF6, HFCs, and HCFCs were included. c. Biogenic CO2 emissions in metric tons of CO2 equivalent. Categorized by stationary and mobile sources, totaling 1.03 tCO2eq d. The base year for the calculation, if applicable, and include: i. the rationale for the selection; We have defined 2022 as our baseline year, taking into account that the data presented for that year is stable. ii. emissions in the base year; 1.540,20 tCO2eq iii. the context of any significant changes in emissions that have led to new calculations of emissions in the base year. None; remains unchanged. e. The source of the emission factors and global warming potential (GWP) values used, or a reference to the GWP source. The bibliographic sources are: UPME, FECOC, IPCC; GHG Protocol, EPA, government agencies. f. The consolidation approach for emissions: equity interest, financial control, or operational control. The approach is operational control, achieving ICONTEC certification in carbon neutrality. g. The standards, methodologies, assumptions, and/or calculation tools used. These are GHG Protocol methodologies.	168 – 172	X	→ Emissions management and climate change
GRI	305–2 Direct GHG Emissions – Scope 2	Chapter: Action for the Planet; Emissions Management and Climate Change; Carbon Footprint. a. The gross value of indirect GHG emissions (Scope 2) in metric tons of CO2 equivalent. For the year 2025, they were 1.002,48 tCO2eq b. Gases included in the calculation: CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all. CO2, CH4, N2O, SF6, HFCs, and HCFCs were included. c. Biogenic CO2 emissions in metric tons of CO2 equivalent. Categorized by stationary and mobile sources, totaling 1,03 tCO2eq	168 – 172	X	→ Emissions management and climate change



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	305-2 Direct GHG Emissions – Scope 2	d. The base year for the calculation, if applicable, and include: i. the rationale for the selection; We have defined 2022 as our baseline year, taking into account that the data presented for that year is stable. ii. emissions in the base year; 1,396.26 tCO₂eq iii. the context of any significant changes in emissions that have led to new calculations of emissions in the base year. None; remains unchanged. e. The source of the emission factors and global warming potential (GWP) values used, or a reference to the GWP source. The bibliographic sources are: UPME, FECOC, IPCC; GHG Protocol, EPA, government agencies. f. The consolidation approach for emissions: equity interest, financial control, or operational control. The approach is operational control, achieving ICONTEC certification in carbon neutrality. g. The standards, methodologies, assumptions, and/or calculation tools used. These are GHG Protocol methodologies.	168 – 172	X	→ Emissions management and climate change
GRI	305-3 Direct GHG Emissions – Scope 3	Chapter: Action for the Planet Subchapter: Emissions Management and Climate Change Section: Carbon Footprint; Indirect GHG Emissions by Category for Scope 3; Funded Absolute Emissions — Scope 3 a. The gross value of direct GHG emissions (Scope 3) in metric tons of CO₂ equivalent. For the year 2025, this was 3.114,11 tCO₂eq b. Gases included in the calculation: CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all. CO₂, CH₄, N₂O, SF₆, HFCs, and HCFCs were included. c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent. Categorized by stationary and mobile sources, totaling 1,03 tCO₂eq d. The base year for the calculation, if applicable, and include: i. the rationale for the selection;	168 – 172	X	→ Emissions management and climate change



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	305–3 Direct GHG Emissions – Scope 3	We have defined 2022 as our baseline year, taking into account that the data presented for that year is stable. ii. emissions in the base year; 6,103.38 tCO₂eq iii. the context of any significant changes in emissions that have led to new calculations of emissions in the base year. None; remains unchanged. e. The source of the emission factors and global warming potential (GWP) values used, or a reference to the GWP source. The bibliographic sources are: UPME, FECOC, IPCC; GHG Protocol, EPA, government agencies. f. The consolidation approach for emissions: equity interest, financial control, or operational control. The approach is operational control, achieving ICONTEC certification in carbon neutrality. g. The standards, methodologies, assumptions, and/or calculation tools used. These are GHG Protocol methodologies.	168 – 172	X	→ Emissions management and climate change
GRI	305–4 GHG Emissions Intensity	Chapter: Action for the Planet Subchapter: Emissions Management and Climate Change Section: Carbon Footprint; GHG Emissions Reduction a. The organization’s GHG emissions intensity ratio. For the year 2025, it was 0,71 b. The specific parameters (denominator) selected to calculate the ratio. c. The types of GHG emissions included in the intensity ratio: direct (Scope 1), indirect from energy generation (Scope 2), and other indirect (Scope 3). All three scopes were included d. The gases included in the calculation: CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all. CO₂, CH₄, N₂O, SF₆, HFCs, and HCFCs were included.	168 – 172	X	→ Emissions management and climate change



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	305–5 Reduction of GHG Emissions	Chapter: Action for the Planet Subsection: Emissions Management and Climate Change Section: Carbon Footprint; GHG Emissions Intensity a. The reduction in GHG emissions as a direct result of reduction initiatives, measured in metric tons of CO2 equivalent. Reduced by 28% compared to 2024 and by 44% compared to 2022, which is the baseline. b. Gases included in the calculation: CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all. CO2, CH4, N2O, SF6, HFCs, and HCFCs were included. c. The base year or baseline, including the rationale for the selection. We have defined 2022 as our baseline, taking into account that the data presented for that year is stable. d. The scopes in which reductions occurred: direct (Scope 1), indirect from energy generation (Scope 2), or other indirect (Scope 3). All three scopes were included. e. The standards, methodologies, assumptions, or calculation tools used. These are GHG Protocol methodologies.	168 – 172	X	→ Emissions management and climate change
GRI	306–3 Waste generated	Chapter: Action for the Planet Subchapter: Operational Eco-efficiency Section: Waste Management; Waste Generation a. Total weight of waste generated in metric tons and a breakdown of this total by waste composition. In 2025, the total waste generated was 246,66 tons, representing a 25,94% reduction compared to 2024. b. Contextual information necessary to understand the data and how it is collected The information is collected through waste disposal certificates issued by authorized waste management operators.	168 – 172	X	→ Emissions management and climate change



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	306–4 Waste Not Sent to Landfill	Chapter: Action for the Planet Subchapter: Operational eco–efficiency Section: Waste Management; Waste Not Intended for Disposal (Recovery) a. Total weight of waste not destined for disposal in metric tons and a breakdown of this total by waste composition. In 2025, 242 metric tons of non–hazardous waste and 21,06 metric tons of hazardous waste were managed and recovered. b. Total weight of hazardous waste not destined for disposal in metric tons: 220,94 tons c. Total weight of non–hazardous waste not destined for disposal in metric tons: 21,06 tons d. For each recovery operation included in Contents 306–4–b and 306–4–c, a breakdown of the total weight in metric tons of hazardous and non–hazardous waste not destined for disposal: In 2025, the amount of waste destined for disposal in landfills decreased. This consists of special or ordinary waste that, due to its characteristics, cannot be recycled, with a 29,29% reduction in the generation of hazardous waste destined for disposal and a 59,79% reduction in the generation of hazardous waste not destined for disposal. e. Contextual information necessary to understand the data and how it is collected. The information is collected through waste disposal certificates issued by authorized waste management operators.	183 – 190	X	→ Operational eco–efficiency
GRI	306–5 Waste sent for disposal	Chapter: Action for the Planet Subsection: Operational Eco–efficiency Section: Waste Management; Waste Intended for Disposal a. Total weight of waste destined for disposal in metric tons and a breakdown of this total based on waste composition. In total, 4,66 metric tons of waste destined for disposal were managed in 2025. b. Total weight of hazardous waste destined for disposal in metric tons: 4,.51 tons c. Total weight of non–hazardous waste destined for disposal in metric tons: 0,15 tons d. For each recovery operation included in Contents 306–4–b and 306–4–c, a breakdown of the total weight in metric tons of hazardous and non–hazardous waste destined for disposal: In 2025 (98,11%), as in the previous 4 years; more than 95% of the waste generated was properly treated and recycled in compliance with current regulations, reflecting the effectiveness of our management. e. Contextual information necessary to understand the data and how it is collected. The information is collected through waste disposal certificates issued by authorized waste management operators.	183 – 190	X	→ Operational eco–efficiency



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	BdO-2 Occiauto Planeta Azul	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: We Promote Sustainable Business Section: Sustainable Financing Products and Services; Personal Banking: Sustainable Solutions for Everyday Decisions	96 – 103		→ Sustainable Finance
Own	BdO-3 Green Builder Line	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Promoting Sustainable Businesses Section: Sustainable financing products and services; Sustainable financing portfolio	96 – 103		→ Sustainable Finance
Own	BdO-4 Planeta Azul Housing	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Promoting Sustainable Businesses Section: Sustainable Financing Products and Services; Personal Banking: Sustainable Solutions for Everyday Decisions	96 – 103		→ Sustainable Finance
Own	BdO-5 Social Sustainability Line	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Promoting Sustainable Businesses Section: Sustainable financing products and services; Green, social, and sustainable loan portfolio	96 – 103		→ Sustainable Finance
Own	BdO-6 Development Portfolio	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Promoting Sustainable Businesses Section: Sustainable Financing Products and Services; Development Portfolio	96 – 103		→ Sustainable Finance
GRI	BdO-7 Tons of CO2 avoided through sustainable mobility	Chapter: Action for the Planet Subchapter: Emissions Management and Climate Change Section: Our GHG Emissions; Sustainable Mobility Program	176		→ Emissions Management and Climate Change
GRI	308-1 New suppliers that have passed selection filters based on environmental criteria	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Responsible Supply Chain Management Section: Environmental and Social Assessment of Suppliers.	115		→ Responsible Supply Chain Management

Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	401-1 Hiring New Employees and Staff Turnover	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Hiring and Turnover	207		→ Talent Management → Diversity and Inclusion
GRI	401-2 Benefits provided to full-time employees that are not provided to part-time or temporary employees	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Employee Wellness and Benefits Programs	207		→ Talent Management
GRI	401-3 Parental Leave	The Bank reports a 100% return-to-work rate following parental leave for both women and men throughout the 2022—2025 period, demonstrating the effectiveness of work-life balance policies. The 12-month retention rate shows sustained improvement, reaching 97% for women and 94% for men in 2025, which reduces gender gaps, strengthens talent stability, and reflects practices aligned with the human capital management criteria evaluated by S&P Global.	210		→ Talent management → Diversity and Inclusion
Own	BdO-8 Filling Vacancies with Internal Talent	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Hiring and Rotation	215 – 217		→ Talent Management
GRI	BdO-9 Investment in benefits and voluntary programs for the workforce (COP)	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Employee Welfare and Benefits Programs	207 – 214		→ Talent Management
GRI	403-1 Occupational Health and Safety Management System	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Health and Safety; Our Approach to Occupational Health and Safety	226 – 239	X	→ Talent Management



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	403–2 Hazard identification, risk assessment, and incident investigation	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Health and Safety; Hazard Identification, Risk Assessment, and Continuous Improvement In 2025, Banco de Occidente had an Occupational Health and Safety Management System (OHSMS) covering 100% of employees, in compliance with current regulations. A total of 471 OSH activities were carried out, and key indicators were monitored: 42 accidents, an accident rate of 3,0, an IFA of 0,60, and total absenteeism of 14,35%, ensuring preventive management and the well-being of workers.	235 – 237	X	→ Talent Management
GRI	403–3 Occupational Health Services	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Health and Safety; Key Occupational Health Services and Programs In 2025, Banco de Occidente ensured full (100%) access to occupational health services for all employees through its Occupational Health and Safety Management System (SG–SST), which includes programs for promotion, prevention, risk management, monitoring of health conditions, and support in cases of accidents and absenteeism. These measures ensure timely care and comprehensive management of the workforce’s physical and mental well-being	235		→ Talent Management
GRI	GRI 403–4 Employee participation, consultation, and communication regarding occupational health and safety	Chapter: Empowering People and Communities Subsection: Human Capital and Talent Management Section: Occupational Safety and Health; OSH Committees and Dialogue Forums; Employee Participation and OSH Committees; Participation in Hazard Identification and Risk Assessment In 2025, Banco de Occidente ensured the active participation of employees in occupational safety and health management through formal mechanisms established within the OSH Management System. All employees were covered by the system (100%) and took part in prevention, training, and follow-up activities, including 471 OSH actions, channels for reporting and risk control, and support processes for incidents, absenteeism, and well-being. These channels enable consultation, dialogue, and direct worker involvement in decisions related to their health and safety	226 – 239		→ Talent Management



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	403–5 Training of workers on occupational health and safety	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Health and Safety; Training for Care and Prevention; Training Coverage and Results in 2025 In 2025, Banco de Occidente strengthened its employees’ competencies in occupational health and safety through training activities included in its SG–SST, as part of the 471 prevention, awareness–raising, and training initiatives carried out during the year. These initiatives helped reinforce risk management, safe practices, and the overall well–being of all employees	226 – 239		→ Talent Management
GRI	403–6 Promotion of employee health	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Safety and Health; Health Promotion and Comprehensive Well–being In 2025, Banco de Occidente strengthened the promotion of its employees’ health and well–being through integrated actions within the SG–SST, which included prevention programs, wellness activities, and support in cases of absenteeism and health risks. The implementation of 471 OSH activities contributed to the comprehensive care of human talent, complemented by training initiatives, a culture of prevention, and support for physical and emotional well–being	226 – 239		→ Talent Management
GRI	403–8 Coverage of the occupational health and safety management system	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Health and Safety; Scope of the SG–SST In 2025, Banco de Occidente ensured that 100% of its employees were covered by the Occupational Health and Safety Management System (SG–SST), guaranteeing the implementation of programs for prevention, risk control, training, and support in occupational health and well–being throughout the organization	226 – 239		→ Talent Management

Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	403–9 Work-related injuries	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Health and Safety; Work-Related Injuries; Key Results on Accidents and Occupational Illnesses 2025 In 2025, Banco de Occidente recorded 42 workplace accidents, with no fatalities or incidents resulting in serious consequences. The accident rate was 3,0, showing a decrease compared to 2024. The severity and frequency rates also decreased, standing at 1,67 and 0,60, respectively. Psychosocial and biomechanical risks associated with administrative activities were primarily identified. The Bank maintains 100% coverage of employees and contractors under the SG–SST and continues to strengthen prevention, training, and epidemiological surveillance programs.	233	X	→ Talent Management
Own	403–10 Occupational Ailments and Illnesses	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Safety and Health; Work-Related Injuries; Key Findings on Accidents and Occupational Diseases in 2025 In 2025, seven classified occupational illnesses were recorded, primarily associated with biomechanical and psychosocial factors, reflecting the risks inherent in administrative activities. There were no fatalities, serious incidents, or high-impact incidents related to occupational illness during the period. The Bank maintains 100% coverage of employees and contractors under the epidemiological surveillance, occupational medicine, and preventive actions programs of the SG–SST	235	X	→ Talent Management
Own	BdO–10 Accident Severity Index	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Safety and Health; Accident Severity Index (ISA)	234	X	→ Talent Management
Own	BdO–11 Accident Frequency Index	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Safety and Health; Accident Frequency Rate (AFR)	234	X	→ Talent Management
GRI	BdO–12 Absenteeism	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Occupational Safety and Health; Absenteeism Rate	234	X	→ Talent Management



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	404–1 Average hours of training per year per employee	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Training and Skills Development Programs In 2025, Banco de Occidente strengthened its continuous learning strategy through La U, with 6.841 employees completing more than 58.000 courses, achieving 100% coverage of the workforce in training initiatives. These initiatives include technical programs, soft skills, and leadership development, driving professional growth and strengthening internal capabilities	203	X	→ Talent Management
GRI	404–2 Programs to develop employee skills and transition support programs	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Training and Skills Development Programs	203 – 207		→ Talent Management
Own	404–3 Percentage of employees who receive periodic performance and career development reviews	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Performance Evaluation For the purposes of this report, it is important to note that the performance evaluation cycle concludes at the end of the first quarter of the year; therefore, in this document we refer to performance for the year 2024, since we are currently in the final quarter of 2025 and the final results will be available in March of this year.	206 – 207		→ Talent Management → Diversity and Inclusion
GRI	BdO–13 Employee Well-being and Satisfaction – GPTW	Chapter: Empowering People and Communities Subchapter: Human Capital and Talent Management Section: Well-being and Motivation: Caring for Our People	202		→ Talent Management
GRI	405–1 Diversity of governance bodies and employees	As of the end of 2025, the workforce is concentrated in the 30—50 age group (46%) and the 18—30 age group (40%), with women accounting for 60% of all employees. The highest proportion of women is found in the Operational and Commercial levels, particularly in the 18—30 and 30—50 age groups. In Senior and Middle Management positions, the age distribution is concentrated primarily in the >50 and 30—50 age groups, with women accounting for between 21% and 25%. This distribution is monitored as part of talent management, in line with efforts to strengthen diversity in leadership and decision-making roles.	203	X	→ Diversity and Inclusion



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	405–2 Ratio of base salary to total compensation for women and men	In 2025, Banco de Occidente made progress in promoting pay equity through transparent compensation policies and objective performance evaluation mechanisms. The organization maintained an approach to equal compensation, ensuring equitable treatment for women and men at all levels, supported by a 99% perception of equitable treatment among employees. These practices are integrated with internal systems for variable compensation, benefits, and professional development, ensuring a consistent salary structure aligned with criteria of merit, responsibilities, and competitiveness. This information is publicly available on our website.	202	X	→ Talent Management → Diversity and Inclusion
GRI	406–1 Cases of Discrimination and Corrective Actions Taken	At Banco de Occidente, we distinguish ourselves by promoting respect for the differences that define us as human beings. Thanks to this culture, to date it has not been necessary to implement specific actions to mitigate or resolve situations related to discrimination for any reason. However, we have clear provisions in our Code of Ethics and Conduct that expressly prohibit all employees from engaging in discriminatory conduct. Additionally, we continuously review our processes to ensure that inclusive and respectful language is used. An example of this is the update to our dress code protocol, “Mi Estilo BdeO,” which now uses gender-neutral language.	219		→ Talent Management → Diversity and Inclusion
GRI	414–1 New suppliers that have passed selection filters based on social criteria	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Responsible Supply Chain Management Section: Environmental and Social Assessment of Suppliers.	115		→ Responsible Supply Chain Management
Own	BdO–14 Social Transformation and Access to Safe Drinking Water in La Guajira (UNICEF)	Chapter: Empowering People and Communities Subchapter: Commitment to Communities Section: Strengthening Access to Water and Sanitation in Vulnerable Communities with UNICEF	255	X	→ Commitment to Our Communities
Own	BdO–15 Social Initiatives – Donations (COP)	Chapter: Empowering People and Communities Subchapter: Commitment to Communities Section: Contributions to Social and Sustainable Development; Donations	261 – 266		→ Commitment to Our Communities



Specific Content: GRI – SASB – External Circular 012 and Banco de Occidente’s Own Indicators					
Standard	Indicator	Response to the indicator 2025	Page	External verification 2025	Material issue
GRI	417–1 Product and service information and labeling requirements	Chapter: Memorable Customer Experience Subchapter: Responsible marketing and financial consumer protection	251		→ Memorable Customer Experience
GRI	418–1 Material complaints regarding breaches of customer privacy and loss of customer data	Chapter: Responsible Growth and Comprehensive Risk Management Subchapter: Information Security, Cybersecurity, and System Availability; Cybersecurity Section: Customer Privacy In 2025, no complaints regarding privacy violations were received, although 703 complaints regarding data handling were received, primarily due to corrections requested by customers. One data breach was identified, affecting 26.533 individuals, and in 100% of cases involved personally identifiable information. In addition, complaints from regulatory bodies increased from 4 to 9, leading to strengthened controls and response capabilities	113		→ Memorable customer experience → Information security, cybersecurity, and system availability
SASB	FN–CB–240a.4 Number of participants in financial education initiatives for unbanked, underbanked, or underserved customers	Chapter: Empowering People and Communities Subchapter: Memorable Customer Experience Section: Training for Excellence in the Customer Experience	248		→ Commitment to Our Communities → Sustainable Finance
Own	BdO–16 Net Promoter Score (NPS)	Chapter: Empowering People and Communities Subchapter: Memorable Customer Experience Section: Net Promoter Score (NPS)	246	X	→ Memorable Customer Experience



4. TCFD Report

Task Force on Climate-related Financial Disclosures (TCFD)

A Strong Commitment to Addressing the Climate Crisis

At Banco de Occidente, we recognize that climate change is one of the most complex and urgent challenges facing humanity in the 21st century. We view it not merely as an environmental risk, but as a critical variable that is reshaping markets, public policy, and social behavior. For this reason, we have taken on the responsibility to act not merely as observers of this transformation, but as financial catalysts driving resilience and sustainability in every sector we support.

Our commitment is not new; since 2022, we have rigorously implemented our roadmap for adopting the Task Force on Climate-related Financial Disclosures (TCFD) framework. This process has marked a turning point in our organizational culture, allowing us to transition from a traditional view of social responsibility toward a technical and strategic integration of climate risk into our governance structure and credit decision-making.

Through this report, we share the progress made in identifying and assessing the physical and transition risks that could affect our portfolio. At the same time, we highlight the opportunities emerging from the green economy, which allow us to design innovative financial products that support our clients in their own transition toward decarbonization. We are convinced that transparency in the disclosure of this data is essential to building trust and stability in the Colombian financial system.

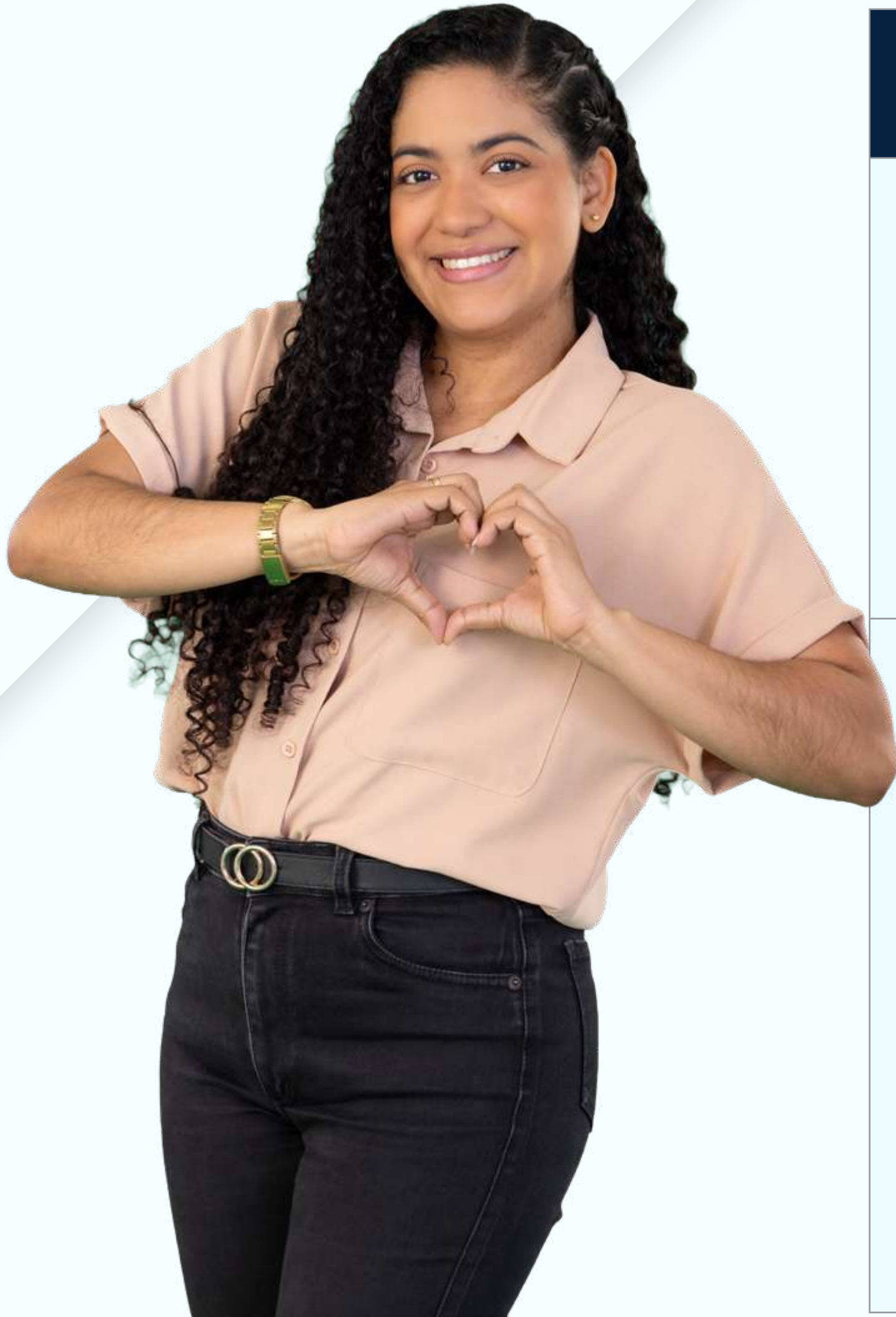
Looking ahead, we reaffirm that our strategy is aligned with global mitigation and adaptation goals. At **Banco de Occidente, we continue to strengthen our metrics and objectives to ensure that every investment and every loan granted contributes to a development model that is economically viable, socially just, and, above all, climate-responsible.**





Key Points

Recommended Disclosure	Key TCFD Aspect	Highlights
Governance: governance structure regarding climate-related risks and opportunities.	✓ Description of the board’s oversight of climate-related risks and opportunities. ✓ Description of management’s role in assessing and managing climate-related risks and opportunities. ✓ Internal capacity building regarding climate change.	✓ Board oversight of climate-related risks and opportunities. ✓ Guidelines to ensure oversight of climate change by the Board of Directors, the Chair, and the various committees.
Strategy: how climate-related risks and opportunities affect the organization’s business, strategy, and long-term planning.	✓ Management of climate-related risks and opportunities identified in the short, medium, and long term: → Adaptation / Mitigation. → Physical / Transition. ✓ Defining the impact of climate-related risks and opportunities on: → The business. → Strategy. → Financial performance. ✓ Description of the resilience of the organization’s strategy, considering different climate-related scenarios, including a 2°C or lower scenario.	✓ We integrate the analysis of climate risks and opportunities into our Climate Strategy, considering short-, medium-, and long-term horizons and their potential impact on the Bank’s business model, portfolio, and financial planning. ✓ We made progress in the financial valuation of prioritized climate risks, incorporating qualitative and quantitative analyses based on climate scenarios, with a focus on physical and transition risks relevant to the portfolio’s strategic sectors. ✓ We strengthened the resilience of the Bank’s strategy by defining a climate vision for 2050, developing a portfolio of decarbonization and resilience opportunities, and progressively aligning with regulatory and market trends as well as national and international commitments.





Recommended Disclosure	Key TCFD Aspect	Highlights
Risk management: explains how the organization identifies, assesses, and manages climate-related risks, integrating these processes into its overall risk management.	✓ The organization’s processes for identifying and assessing climate-related risks. ✓ Description of the Organization’s processes for managing climate-related risks. ✓ Description of how the processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.	The Environmental and Social Risk Management System (SARAS) will be the mechanism through which information on the climate risks to which customers are exposed will be captured and managed.
Metrics and Objectives: provides information on the metrics used to assess climate-related risks and opportunities and the objectives established to manage those risks.	✓ Discloses the metrics used by the Organization to assess climate-related risks and opportunities in line with its strategy and risk management process. ✓ Discloses Scope 1, Scope 2, and, where applicable, Scope 3 GHG emissions and related risks. ✓ Describes the targets used by the Organization to manage climate-related risks and opportunities and performance against those targets.	✓ We define and apply metrics to assess climate risks and opportunities, progressively integrating them into the Bank’s portfolio analysis, risk management, and strategic decision-making. ✓ We measure and disclose Scope 1, 2, and 3 GHG emissions, as well as emissions intensity, with historical tracking dating back to 2021. In 2025, we consolidated the measurement of financed emissions corresponding to the 2024 portfolio, achieving 98,38% coverage of the assessed portfolio and strengthening the identification of sectors with the highest climate exposure. ✓ We established decarbonization and eco-efficiency objectives aligned with our Climate Strategy, including emission reduction targets for 2030 and a commitment to carbon neutrality by 2050, as well as actions aimed at supporting our clients in their transition toward more sustainable and resilient models.

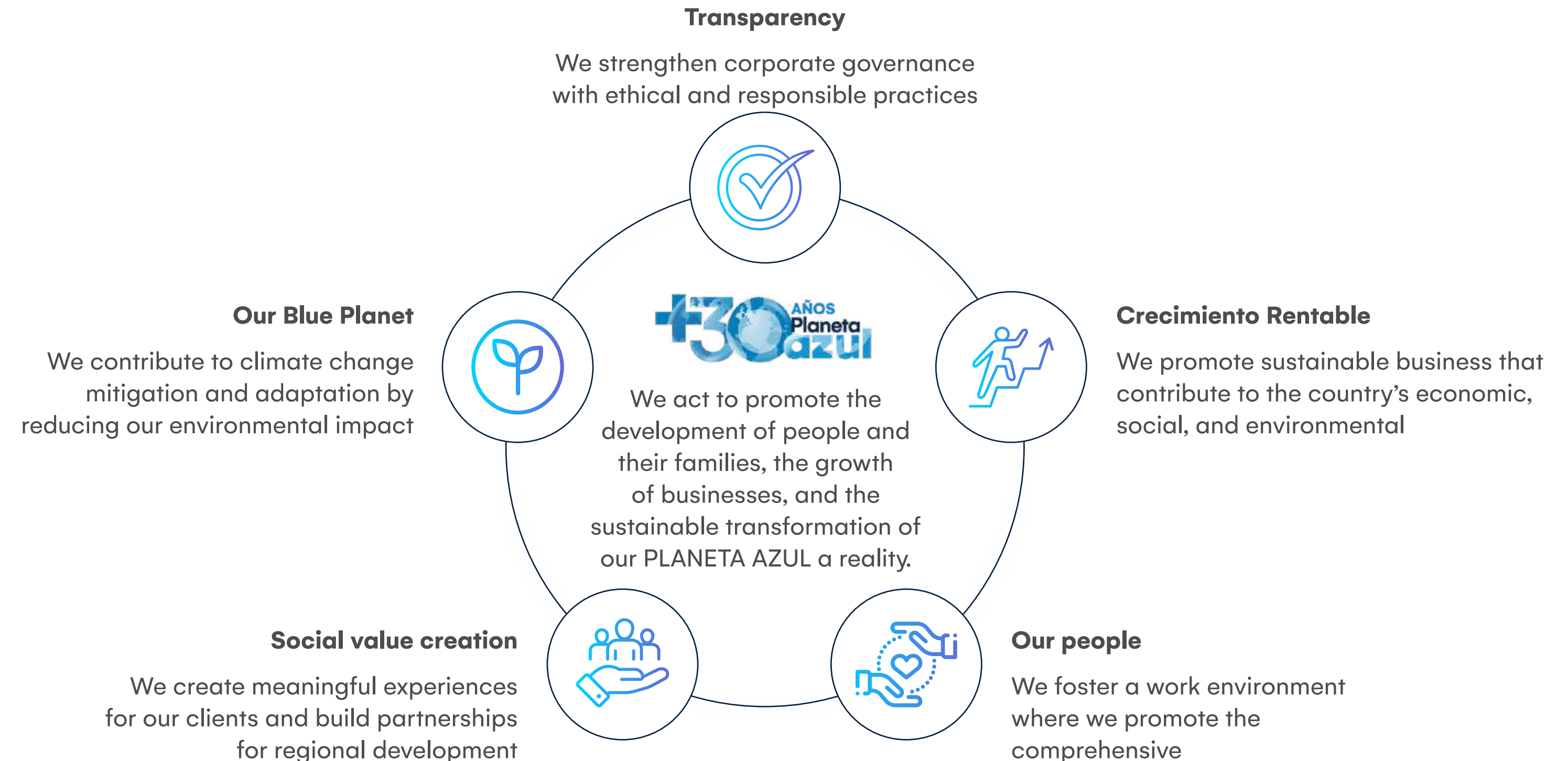


Alignment with the Sustainability Strategy

Occidente, we integrate climate change management across the board into our sustainability strategy and into the way we create long-term value. Through **Planeta Azul**, we focus our actions on mitigating greenhouse gas (GHG) emissions and adapting to climate change, the responsible use of natural resources, and environmental conservation, consistent with **responsible management of climate-related risks and opportunities**.

We align our strategy with the pillars of **transparency, profitable growth, social value creation, and the development of our people**. Additionally, we align with international frameworks such as the United Nations Global Compact, the Sustainable Development Goals (SDGs), and industry best practices, strengthening the resilience of our business and our contribution to the country's sustainable development. We create meaningful experiences for our customers and build partnerships to foster regional development.

Our Strategy





Alignment with the SDGs

We align our sustainability strategy with the SDGs, using them as the fundamental framework to guide our environmental, social, and governance (ESG) management. Based on the results of the **double materiality analysis**, we prioritize the issues that generate the greatest impact and contribution to sustainable development, aligning our actions, products, and decisions with the global goals of the 2030 Agenda.



Axis	Description	Material Issues	SDG Contribution
Environmental	We contribute to GHG mitigation and climate change adaptation by reducing our environmental impact.	✓ Operational eco-efficiency. ✓ Emissions management and climate change. ✓ Protection of biodiversity and ecosystems.	6 CLEAN WATER AND SANITATION 13 CLIMATE ACTION 15 LIFE ON LAND
Social	We foster a work environment where we promote the comprehensive development of talent, create meaningful experiences for our customers, and build partnerships for regional development, progressively incorporating social and climate risk management into our relationships with our stakeholders.	✓ Commitment to our communities. ✓ Diversity and inclusion. ✓ Memorable customer experience. ✓ Talent management. ✓ Respect for Human Rights.	5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES
Corporate Governance	We strengthen corporate governance through internal policies and frameworks that promote ethical and responsible practices and the integration of ESG and climate criteria into our business.	✓ Ethical commitment and ESG governance. ✓ Sustainable finance. ✓ Responsible supply chain management. ✓ Responsible marketing. ✓ Information security, cybersecurity, and system availability.	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 11 SUSTAINABLE CITIES AND COMMUNITIES 17 PARTNERSHIPS FOR THE GOALS



Track Record and Partnerships in Climate Action

This track record reflects a progressive process of institutional strengthening, alignment with public policies, adoption of international standards, and the building of strategic partnerships, which today enables us to address climate risk in a manner aligned with our business strategy and focused on generating long-term value.



1984

Launch of the annual publication of the Ecolibro, an initiative aimed at raising awareness and promoting the appreciation of Colombia's biodiversity and natural resources.

1993

Creation of the Planeta Azul Award to recognize outstanding environmental initiatives in the country.

Launch of the Occiauto Planeta Azul line, incorporating environmental criteria into financial solutions.

2005
2006



2012

Adherence to Asobancaria's Green Protocol, strengthening the financial sector's commitment to environmental sustainability.

2021

Participation in the National Carbon Neutrality Program, within the framework of the Colombia Carbon Neutral Strategy (ECCN), led by the Ministry of Environment and Sustainable Development.

2022

✓ Signing of a cooperation agreement with the Center for Sustainable Finance at the Universidad de los Andes to support research in sustainable finance.

✓ Establishment of strategic partnerships with WWF and the NGO Saving the Amazon.

✓ Definition of the Bank's Climate Change and Eco-efficiency Strategy.

✓ Adherence to the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking.

2023

✓ Launch of the Green Builder and Planeta Azul Housing lines.

✓ Implementation of the Environmental and Social Risk Management System (SARAS).

✓ Adoption of the TCFD framework and SFC External Circular 031 of 2021.

✓ Partnership with the Inter-American Development Bank (IDB) to develop the Sustainable Financing Strategy.

2024

✓ Obtaining the Carbon Neutral certificate for Scope 1 and 2 GHG emissions issued by ICONTEC.

✓ Active participation in COP16.

✓ Adherence to the Finance for Biodiversity initiative.

✓ Publication of the Bank's sustainable taxonomy.

2025



✓ Consolidation of the climate management approach through carbon footprint auditing and verification by ICONTEC, strengthening the quality and traceability of environmental information.

✓ Participation in strategic dialogue forums such as Ecos Bogotá and the Orinoquía Verde y Competitiva Summit, promoting climate finance and the integration of ESG criteria in key productive sectors.

✓ Progress in sustainable mobility, avoiding the emission of more than 31.000 kg of CO₂e, as part of operational mitigation actions.

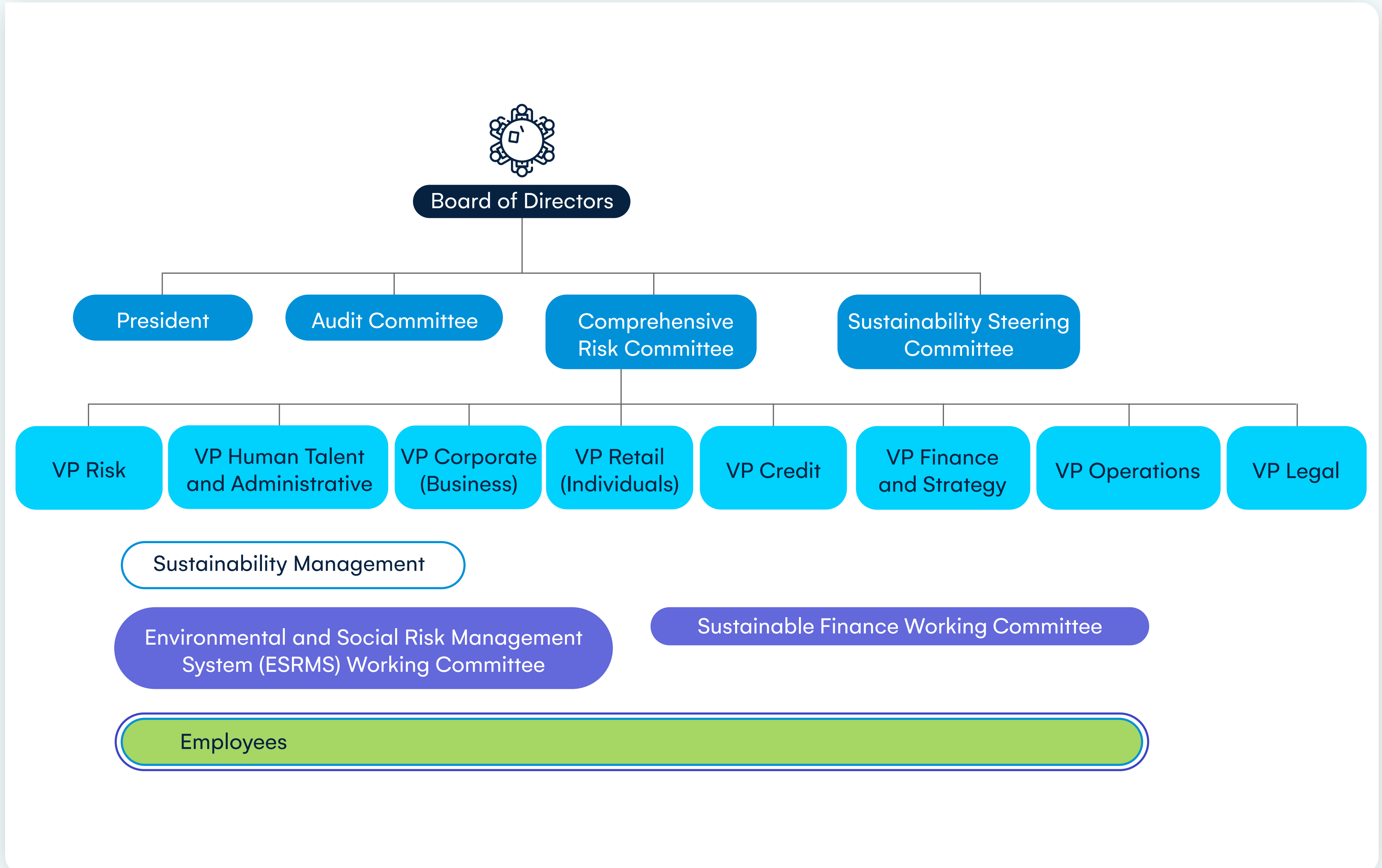
✓ Awarded, for the second consecutive year, of the Sello Verde de Verdad (True Green Seal), in recognition of environmental and climate management.

✓ Launch of a specialized project to enhance the measurement of financed emissions, expand its coverage, and lay the groundwork for setting climate targets aligned with the Partnership for Carbon Accounting Financials (PCAF) starting in 2026.



Climate Governance Structure

We base our climate governance on a clear and well-defined organizational structure, where we assign specific roles and responsibilities to manage the risks and opportunities associated with climate change and sustainability. This structure allows us to integrate climate and ESG criteria into strategic decision-making, risk management, and business operations. Thus, we ensure oversight from the highest levels of corporate governance and coordinated execution across all key areas of our institution.





In 2025, Banco de Occidente began strengthening its climate governance through a structured process of defining and formalizing strategic roles, aimed at more consistently integrating climate change management into existing risk management, internal control, and strategic decision-making systems. This process included consultation sessions with key departments and the design and refinement of an updated climate governance model, which will be submitted for approval by Senior Management.

As part of this process, six two-hour training and awareness-raising sessions were held for employees and key decision-making bodies such as risk, credit, and sustainability committees and teams, with the aim of strengthening internal capabilities regarding climate change, environmental risks, and sustainable finance. The sessions addressed fundamental concepts of climate change, physical and transition risks, regulatory trends, and climate analysis tools, promoting a consistent and cross-functional understanding of climate risks and opportunities within the organization.

These activities were attended by more than 30 employees from areas such as sustainability, credit risk, market, liquidity, and operations, as well as financial planning and commercial units within Corporate Banking and Retail Banking, helping to strengthen ownership of the climate approach and support the progressive implementation of the Bank's climate governance model.



Lines of Defense in Climate Governance

To strengthen the management and control of climate risks, Banco de Occidente has adopted a **three-line-of-defense** governance model, which enables an appropriate separation of duties, greater control, and comprehensive management aligned with the General Risk Management System.

- ✓ **First line of defense:** The Bank's operational areas that integrate climate change considerations into the execution of processes, in accordance with corporate governance guidelines and current regulations, to prevent the materialization of risks.
- ✓ **Second line of defense:** The Vice Presidency of Risk and its departments, responsible for assessing, measuring, monitoring, and mitigating risks—including those associated with climate change—to support comprehensive management and decision-making.
- ✓ **Third line of defense:** Audit Department, responsible for conducting independent assurance activities to verify the effectiveness of the internal control system and its alignment with the Bank's strategy.





Support structure for climate change management

Our committees play a key role in climate change management by facilitating the **integration of strategic guidelines and decisions** into our operations. Through these forums, we promote effective coordination between strategy, policies, and processes, ensuring their alignment with our institutional objectives and with a focus on sustainability and corporate responsibility.

Body	Functions / Responsibilities	Frequency
Board of Directors	Approve guidelines and criteria for climate-related information disclosure. Oversee material issues related to climate change. Approve frameworks, policies, and plans for managing climate-related financial and non-financial risks. Make strategic decisions considering climate risks and opportunities.	Continuous

Body	Functions / Responsibilities	Frequency
Integrated Risk Committee	Integrate climate risks and opportunities into the Bank's risk management model. Designate individuals responsible for managing climate risks and opportunities. Monitor their handling and evolution. Report to the Board of Directors on the Bank's exposure to and financial impacts associated with climate change. Monitor the management of climate risks and opportunities.	Quarterly
Internal Audit Committee	Verify the compliance of methodologies, processes, and disclosed information related to climate change management.	Quarterly
Sustainability Steering Committee	Report to the Chairman on the management of climate change risks and opportunities. Ensure internal capabilities regarding climate change. Ensure the implementation of climate policies, plans, and strategies approved by the Board of Directors.	Quarterly





Climate Policies and Enablers

At Banco de Occidente, we have a set of commitments, policies, and guidelines that guide our decisions and operations regarding ESG issues and enable us to progressively integrate climate change management into our strategy, risk management, and business operations.

The **Sustainability Strategy** serves as the guiding framework for these policies and directs the Bank's ESG initiatives, contributing to its positioning as a leader in sustainability within the financial sector. This Strategy was **updated in 2025** to establish clear, measurable objectives aligned with current challenges, structured around five strategic commitments:

- ✓ We contribute to climate change mitigation and adaptation by reducing our environmental impact.
- ✓ We strengthen corporate governance through ethical and responsible practices.
- ✓ We promote sustainable businesses that contribute to the country's economic, social, and environmental development.

- ✓ We create meaningful experiences for our customers and build partnerships to support regional development.
- ✓ **We foster a work environment where we promote the comprehensive development of talent.**



Environmental and Climate Change Policy of Banco de Occidente and Subsidiaries

The Environmental and Climate Change Policy constitutes the primary institutional framework for climate change management at Banco de Occidente and its subsidiaries. This policy establishes the general principles that guide the development of initiatives aligned with the Sustainability Strategy, integrating environmental management into business operations, decision-making, and risk management.

This policy defines guidelines related to regulatory compliance and voluntary commitments, the measurement and offsetting of the carbon footprint, the implementation of eco-efficiency practices, the promotion of thematic financing, climate risk management, and the strengthening of internal and supply chain capabilities.

It also defines procedures with a direct impact, such as measuring and offsetting the carbon footprint, setting climate targets, and managing risks associated with climate change, all of which support the Bank's comprehensive risk management. In addition, it includes actions with an indirect impact, such as measuring indirect emissions and participating in climate mitigation, adaptation, and financing initiatives.



Environmental and Climate Change

1.

Support compliance with the country's current environmental regulations applicable to our activities where Banco de Occidente and its subsidiaries operate, as well as the voluntary commitments to which it adheres.

2.

Design and implement a social and environmental risk management system for projects and companies financed by Banco de Occidente and its subsidiaries.



3.

Promote financing for eco-efficient projects and initiatives for both companies and individuals.

4.

Develop and strengthen green and/or blue products and services for different business segments and measure their environmental impact.

5.

Implement an environmental management system with responsible use and consumption practices for resources such as energy, paper, and water, including objectives and performance indicators.

6.

Promote training and awareness among employees, customers, suppliers, and other stakeholders regarding environmental care and protection.

7.

Strengthen high-impact environmental initiatives, such as the Planeta Azul Award and the Ecolibros, which highlight educational and productive actions that benefit ecosystems and natural resources.

8.

Promote sustainable practices among our suppliers and include these criteria in the evaluation and selection processes for the procurement of goods and services.

9.

Support environmental projects aligned with the Bank's sustainability strategy, particularly those aimed at energy transition.

At Banco de Occidente, we have a **set of policies and guidelines** that support the progressive alignment of our **environmental, social, and corporate governance (ESG) management** with climate challenges. While these frameworks were not created exclusively for climate management, we have consolidated them as strategic enablers that allow us to integrate sustainability considerations into every decision and the daily operations of our business.



Social Investment Policy

It recognizes Banco de Occidente's role as a key player in the development of people, regions, and the country. This policy defines a strategic approach to prioritize, implement, and monitor social investments, ensuring their alignment with corporate objectives, the Sustainability Strategy, the Sustainable Development Goals, and the principles of ethics and transparency. It also highlights the importance of having indicators and methodologies to measure the impact of these investments and establishes clear approval mechanisms and guidelines for unauthorized practices.

Human Rights Policy

This policy defines Banco de Occidente's commitment to respecting, protecting, and remedying the human rights of its stakeholders. It establishes specific guidelines for employees, customers, and partners, promoting a respectful work environment, equal opportunities, access to clear and accurate information, the protection of personal data, and treatment free from discrimination in all interactions.

Sustainable Finance Guidelines

These guidelines direct the incorporation of ESG criteria into project financing, asset financing, and working capital financing operations across all of the Bank's segments. These guidelines aim to offer financing opportunities that promote responsible and sustainable practices and incorporate the **Bank's Sustainable Taxonomy**—based on Colombia's Green Taxonomy—as a tool for classifying and monitoring operations.

Environmental and Social Risk Management System (SARAS) Policy

This policy establishes the Bank's commitment to managing environmental and social risks in the credit evaluation and origination process, with the aim of minimizing the likelihood of negative impacts and directing financial flows toward activities that demonstrate responsible stewardship of the environment and society.



This policy applies to the commercial portfolio and is grounded in principles such as respect for human rights, protection of nature, and prevention, mitigation, and adaptation to climate change. SARAS includes a list of excluded activities, the categorization of clients according to their level of environmental and social risk, assessment using specific tools, and monitoring of clients with the highest risk exposure.

SARAS Manual

It makes the Environmental and Social Risk Management System operational by defining clear roles, responsibilities, and tools for the areas involved. The manual outlines six stages, from the initial screening based on the exclusion list to the final evaluation of results and details the steps and components necessary to ensure the system functions properly.

This set of policies and internal frameworks enables the Bank to manage the risks and opportunities associated with climate change in a cross-cutting manner, strengthening the coherence between strategy, risk management, and business operations.

Climate Strategy and Long-Term Horizon

At Banco de Occidente, we have made steady progress in adopting and implementing a comprehensive climate strategy aimed at identifying, managing, and mitigating climate risks, as well as seizing opportunities for decarbonization and strengthening resilience. Our roadmap operates in phases and integrates risk management, the identification of opportunities, and the implementation of actions aligned with national goals and international best practices.

Our approach seeks to contribute to the country’s climate goals, maintain the carbon neutrality of our operations, and strengthen the resilience of our clients and the financed portfolio, with a long-term vision toward 2050.





Vision for the 2050 Climate Strategy and Progress Toward the Climate Strategy

Timeframe	2022 – 2023	2023	2024 – 2030	2025 – 2030	2050
Climate Strategy Phase	Climate risk assessment	Identification of short- and medium-term decarbonization and resilience opportunities	Implementation of the decarbonization and resilience portfolio	Alignment with the market and national trends	Long-term vision
	Analysis of physical and transition risks associated with climate change linked to political, technological, and market changes. The analysis considered various climate scenarios and prioritized those with the greatest potential financial impact on the organization.	Identification of opportunities to promote investment in projects and activities aligned with the transition to a low-carbon economy, leveraging the Bank’s existing financial products.	Development of financial products and services that support clients in the transition to low-carbon operations and the adoption of sound environmental practices.	Regularly updating internal practices, strategies, and processes in line with market trends and national and international climate commitments.	Strengthening the resilience of the Bank’s strategy and operations in the face of future climate scenarios, mitigating direct and indirect ESG impacts.
Progress Toward 2025	Identification of 29 climate risks, of which 15 were prioritized based on their financial relevance. Classification of risks by time horizon and type (physical and transition risks).	Identification of 21 opportunities associated with climate change. Identification of 9 opportunities arising from climate-related financial risks, focused on resilience and adaptation.	Implementation of 4 specialized sustainable credit lines. Financing available across all credit products under 8 eligibility criteria related to climate change, environmental protection, and ecosystem conservation.	Development of the Bank’s Sustainable and Transition Taxonomy, based on Colombia’s Green Taxonomy and international criteria. Strengthening the alignment between financial offerings and the country’s climate commitments.	Carbon neutrality achieved for Scope 1 and 2 GHG emissions. Initiation of measurement of financed emissions in priority sectors: energy, construction, and oil and gas.
	(IN PROGRESS)	(ADVANCED)	(IN PROGRESS)	(IN PROGRESS)	(IN PROGRESS)

Level of progress in each phase of the climate strategy

Advanced

In Progress

Under Review



Risks arising from climate change

As part of our climate strategy and in line with TCFD recommendations, at Banco de Occidente we conduct a comprehensive analysis of risks arising from climate change. Our goal is to anticipate potential impacts on our **operations, our portfolio, and our long-term strategy**. This process has enabled us to strengthen risk management, guide decision-making, and advance the implementation of GHG mitigation, adaptation, and climate resilience measures.

For the analysis of climate risks, we consider two broad categories, based on their nature and how they materialize:



Physical Risks

These are risks associated with the **direct and indirect effects of climate change** on assets, operations, and the regions where both we and our clients operate. These risks are classified into two main groups:

1.

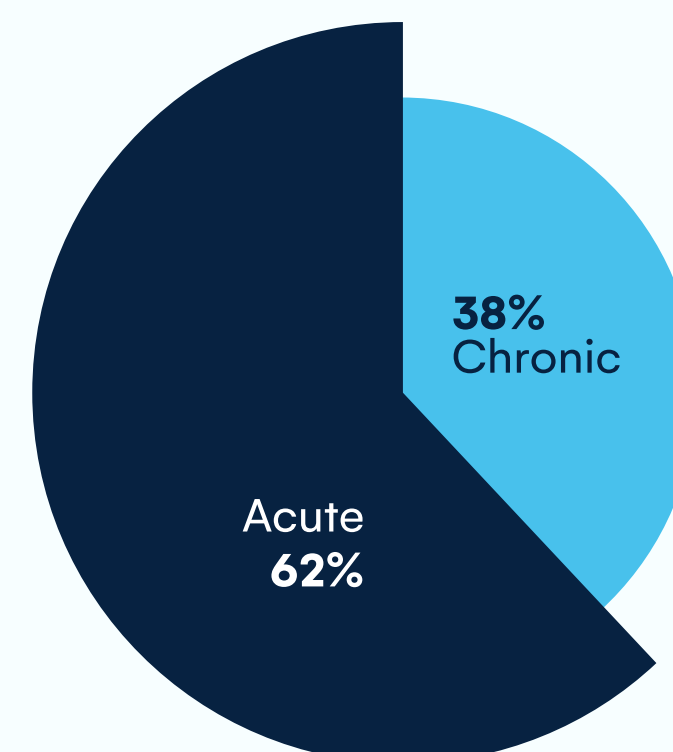
Acute physical risks: associated with sudden-onset extreme weather events, such as floods, landslides, cyclones, heat waves, and flash floods, which can immediately affect operational continuity and the portfolio.

2.

Chronic physical risks: related to gradual, long-term changes in climate patterns, such as variations in precipitation patterns, rising average temperatures, increased climate variability, and sea-level rise, with progressive impacts on economic sectors and regions.

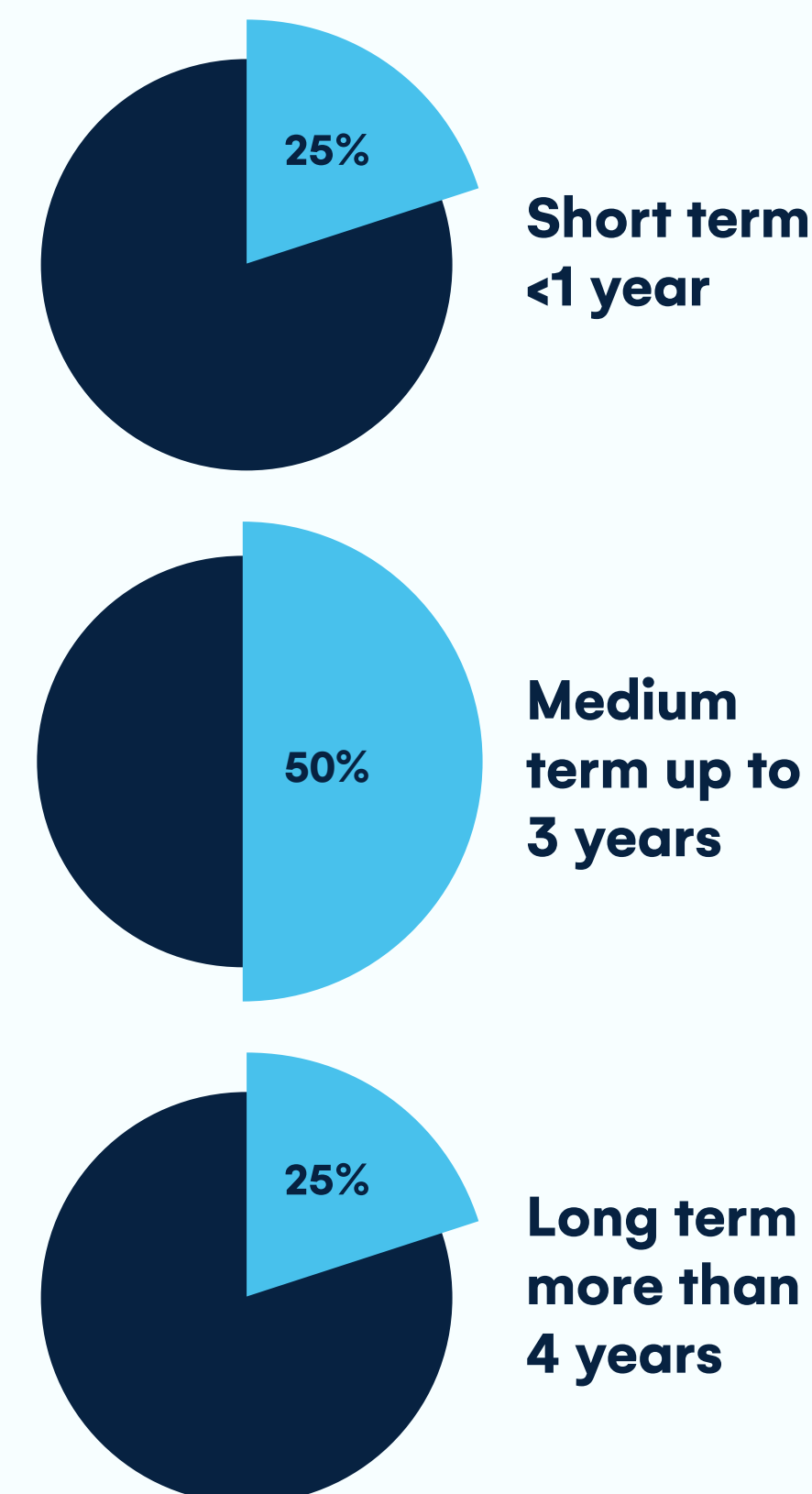
In this process, we identified **eight physical risks**, of which **62% are acute risks** and **38% are chronic risks**. Since most of these events are expected to materialize in the short and medium term, we prioritize strengthening our prevention, mitigation, and adaptation measures to protect the stability of our portfolio.

Distribution of assessed physical risks



Distribution of physical risks by time horizon

In our analysis of climate risks, we consider different time horizons, thereby assessing their potential occurrence in the **short, medium, and long term**, as well as their potential financial impact.





Description of physical risks arising from climate change

			Time horizon		
Type	Climate-related risk	Potential financial risk	Short term 1 year	Medium term Up to 3 years	Long term More than 4 years
Acute	Failure by customers to meet their payment obligations as a result of damage, deterioration, or operational disruptions caused by extreme weather events.	Credit risk arising from customers' failure to meet their obligations due to extreme weather events.			
	Increase in losses in the portfolio exposed to economic sectors vulnerable to extreme weather events.	Credit risk associated with increased delinquency and portfolio deterioration in sectors highly exposed to extreme weather events.			
	Impact on projects directly financed by the Bank due to the occurrence of extreme weather events.	The Bank's liquidity risk associated with unanticipated outflows of funds resulting from extreme weather events.			
	Early withdrawals of funds by customers to cover repairs, losses, or expenses resulting from extreme weather events.	The Bank's liquidity risk due to early withdrawals by customers to cover repairs for damage and losses caused by extreme weather events			
	Damage, deterioration, or disruptions to the Bank's operations caused by extreme weather events affecting employees, facilities, and critical infrastructure.	Operational risk due to impacts on business continuity, infrastructure, and staff safety resulting from extreme weather events.			
Chronic	Changes in precipitation patterns and increased long-term climate variability.	Loss of value of customer assets (collateral) due to their location in areas with water supply issues (desertification)			
		Increases in customers' operating costs (agricultural investments)			
	Gradual rise in sea level.	Deterioration in the value of credit collateral and customer assets located in coastal areas vulnerable to sea-level rise.			



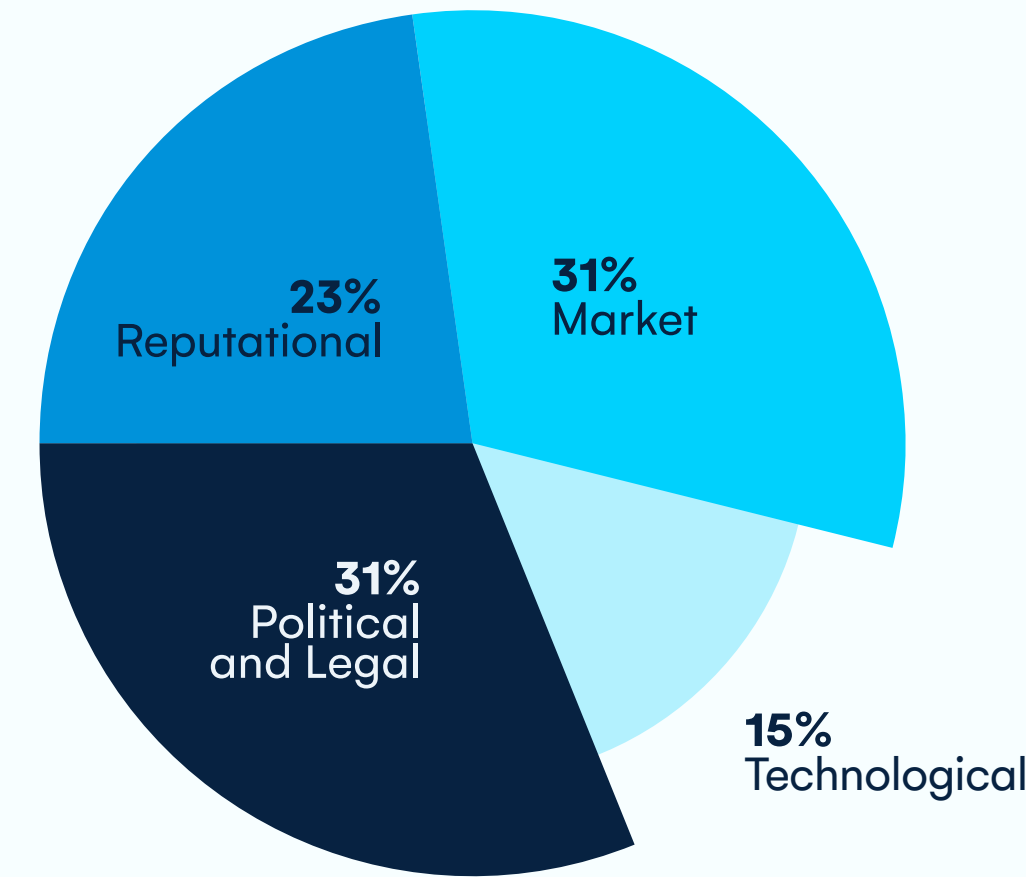
Transition risks

These are risks arising from changes in the political, technological, and market environment associated with the transition to a low-carbon economy. Depending on the nature, speed, and scope of these changes, transition risks can have varying impacts on organizations and economic sectors.

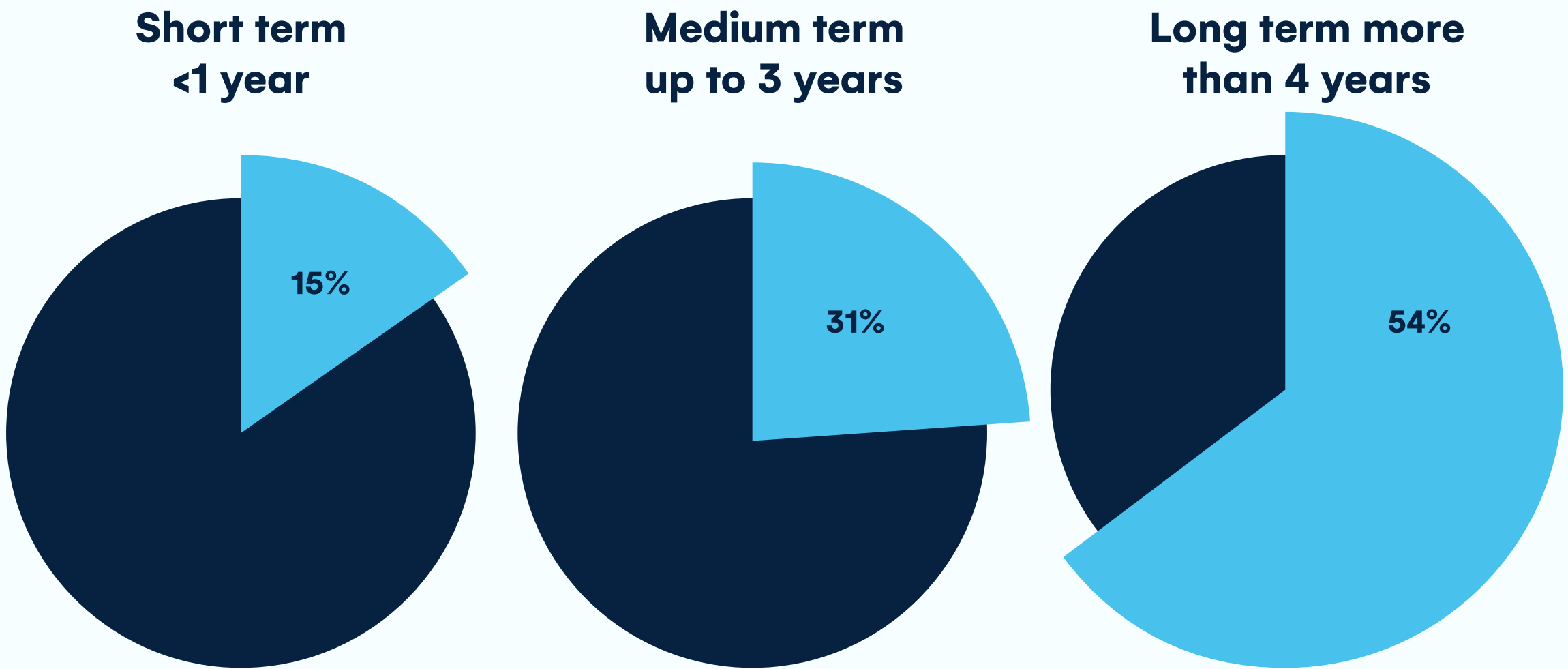
According to the TCFD framework, these risks are classified into four main categories: **political and legal, technological, market, and reputational risks**, which may affect the strategy, operations, and financial performance of the Bank and our clients.

In this process, we identified **12 transition risks**, of which **62% correspond to market, policy, and legal risks**, primarily associated with current regulatory changes, emerging regulatory requirements, as well as shifts in demand and adjustments to the business models of the sectors we finance; **23% correspond to reputational risks**; and the remaining **15% correspond to technology risks**.

Distribution of assessed transition risks



Distribution of transition risks by time horizon



Unlike physical risks—which have already materialized recently in the country through events such as wildfires, water shortages, and floods—transition risks are **more concentrated in the long term**, accounting for **54%**. This highlights the importance of anticipating them and progressively integrating them into our strategy, risk management, and financial planning.



Description of transition risks arising from climate change

In 2025, we moved toward the progressive incorporation of quantitative analyses by climate scenarios, strengthening the assessment of financial impacts on our portfolio and operations.

			Time horizon		
Type	Climate-related risk	Potential financial risk	Short term 1 year	Medium term Up to 3 years	Long term More than 4 years
Market risk	The bank's lack of alignment with its customers' sustainable preferences.	Increased market risk due to the bank's lack of alignment with its customers' sustainable preferences.			
	Decreased viability of business lines or models due to changes in customer preferences (decrease or increase in customers).	Reduced lending due to the decreased viability of business lines or models caused by changes in customer preferences (customers).			
	Difficulty in liquidating positions in the investment portfolio involving carbon-intensive assets or issuers vulnerable to the transition, both locally and internationally.	The Bank's liquidity risk due to difficulty in liquidating positions in the investment portfolio involving carbon-intensive assets or issuers vulnerable to the energy transition, both locally and internationally.			
	Increase in customers' operating costs due to abrupt and unexpected changes in raw materials and inputs.	Credit risk due to increased operating costs for clients resulting from abrupt and unexpected changes in raw materials and inputs.			
Technological risk	Increase in clients' expenses due to the adoption of low-carbon technologies.	Increased credit risk due to increased customer expenses when adopting low-carbon technologies.			
	Increase in the Bank's costs due to the adoption of low-carbon technological advancements.	Increased operational risk due to failure to adopt low-carbon technological advancements.			
Political and legal risks	Changes in climate policies, resulting in fines, penalties, and additional expenses to comply with requirements.	Operational risk due to changes in climate policies, resulting in fines, penalties, and additional expenses to meet requirements.			
	Default on payment obligations by carbon-intensive borrowers due to the implementation of national policies.	Credit risk due to failure by clients with carbon-intensive activities to meet their payment obligations as a result of the implementation of national policies.			

Description of transition risks arising from climate change

In 2025, we moved toward the progressive incorporation of quantitative analyses by climate scenarios, strengthening the assessment of financial impacts on our portfolio and operations.

Type	Climate-related risk	Potential financial risk	Time horizon		
			Short term 1 year	Medium term Up to 3 years	Long term More than 4 years
Political and legal risks	Exposure to litigation.	Increased costs due to potential environmental litigation for clients resulting from non-compliance with regulations.			
		Potential lawsuits against the Bank for failing to comply with climate change regulations in the business or supply chain.			
Reputational risk	Reputational risk due to climate inaction.	Reputational risk due to climate inaction.			
	Changes in consumer preferences.	Loss of customers for the Bank, due to the perception that it finances projects or activities harmful to the environment.			
	Stigmatization of the sector.	Damage to the Bank's image due to a perceived lack of commitment when financing projects or activities that affect the environment.			



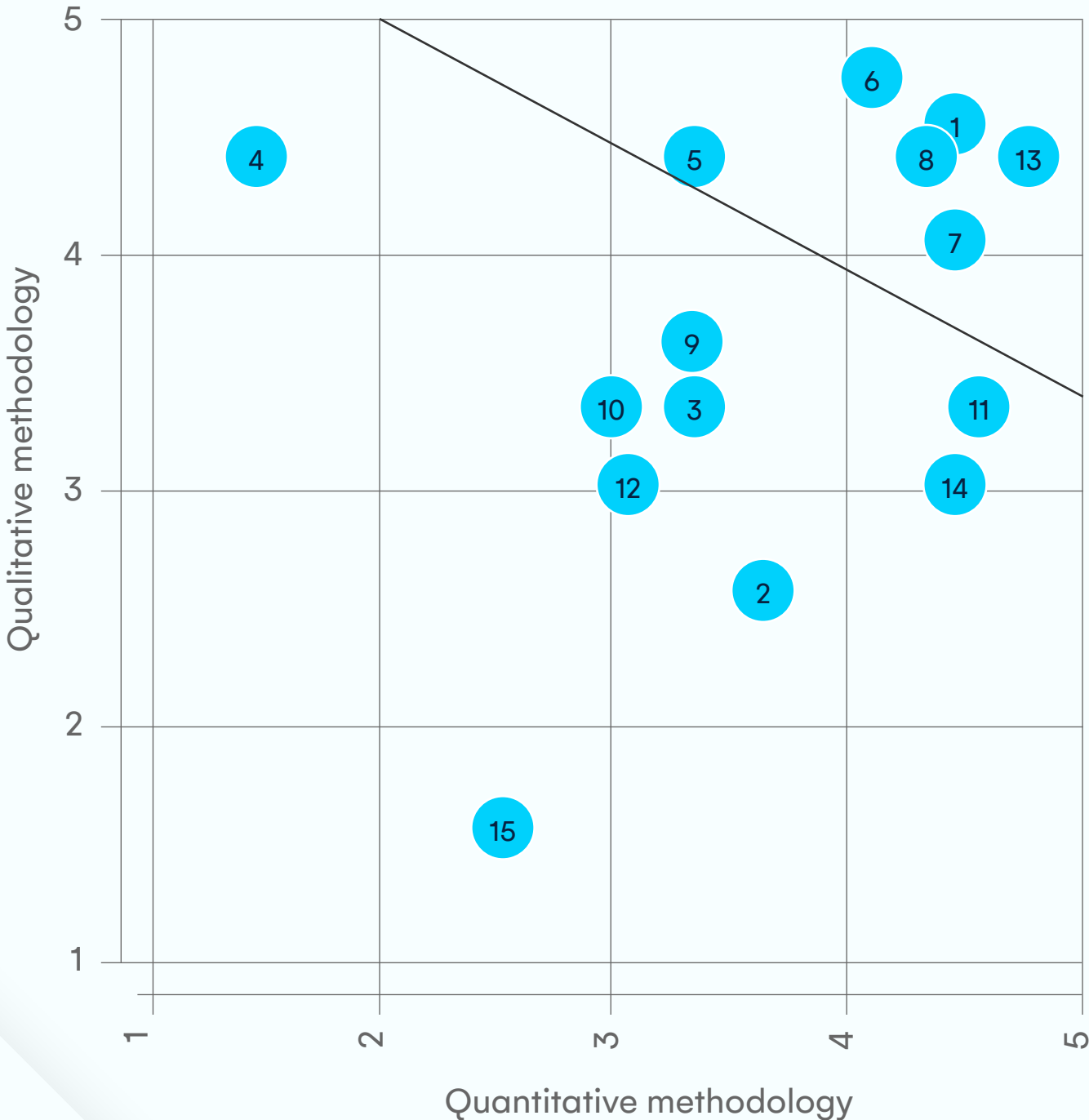


Assessment of financial impacts

To assess the financial impacts associated with climate change, in 2023 we conducted a qualitative and quantitative analysis (evaluating the level of confidence, probability, and sensitivity), aimed at strengthening our strategic decision-making and comprehensive risk management.

This analysis allowed us to prioritize climate risks with the greatest financial relevance, applying criteria of exposure, severity of impact, and time horizon under the TCFD framework. As a result, **we prioritized six strategic climate risks** to move forward to the financial valuation phase, which we detail in the following chart:

Prioritization of climate risks for the financial valuation phase



R1

Credit risk due to customers' failure to meet their payment obligations as a result of damage, deterioration, and/or disruption of operations caused by extreme weather events.

Increased market risk due to the Bank's lack of alignment with its clients' sustainable preferences.

R5

R6

Credit risk arising from increased operating costs for clients due to abrupt and unforeseen fluctuations in raw materials and input prices.

Credit risk due to increased operating costs for customers resulting from abrupt and unexpected changes in raw materials and inputs.

R7

R8

The Bank's liquidity risk due to early withdrawals by clients to cover repairs for damage and losses caused by extreme weather events.

Credit risk due to increased losses in the portfolio exposed to sectors vulnerable to extreme weather events.

R13

List of other identified risks:

- ✓ **R2:** Credit risk due to default on obligations by customers engaged in carbon-intensive activities because of the implementation of national policies.
- ✓ **R3:** Increased credit risk due to higher customer expenses when adopting low-carbon technologies.
- ✓ **R4:** Increased operational risk due to rising costs, non-compliance events, and reputational damage to the Bank or its suppliers resulting from the adoption of low-carbon technological advancements.



- ✓ **R9:** The Bank’s liquidity risk due to the reduced viability of business lines or models resulting from changes in customer preferences (decrease or increase in customers).
- ✓ **R10:** The Bank’s liquidity risk due to the difficulty in liquidating positions in the investment portfolio involving carbon-intensive assets or issuers vulnerable to the transition, both local and international.
- ✓ **R11:** Operational risk due to damage, deterioration, and/or disruption of the Bank’s operations caused by extreme weather events affecting employees and infrastructure.
- ✓ **R12:** Operational risk due to changes in climate policies, resulting in fines, penalties, and additional expenses to comply with requirements..
- ✓ **R14:** Underwriting risk due to inadequate pricing and issuance of insurance for assets serving as collateral in high-climate-risk locations.
- ✓ **R15:** Reputational risk due to climate inaction.

We also assess the impacts for each of the prioritized financial risks using **stochastic and non-deterministic methodologies**, which allow us to capture the uncertainty inherent in climate and transition scenarios. This approach enables us to model the variability of their effects on our financial performance, ensuring a more robust and less linear view of the risks we face.

TCFD Category	Risk Description	Impact Description
Risk 1 – Acute Physical	Credit risk arising from customers’ failure to meet their payment obligations due to damage, deterioration, and/or disruption of operations caused by extreme weather events.	Increase in indicators: Loss Given Default (LGD), Probability of Default (PD), and Exposure at Default (EAD).
Risk 2 – Acute physical	Credit risk arising from customers’ failure to meet their obligations due to the implementation of national policies affecting carbon-intensive activities.	Increase in indicators: Loss Given Default (LGD), Probability of Default (PD), and Exposure at Default (EAD).
Risk 5 – Market	Increased market risk due to the Bank’s lack of alignment with its clients’ sustainable preferences.	Decrease in deposits and prepayments on the loan portfolio. Decrease in market share.
Risk 6 – Acute Physical	Credit risk due to increased operating costs for customers resulting from abrupt and unexpected changes in raw materials and inputs.	Increase in indicators: Loss Given Default (LGD), Probability of Default (PD), and Exposure at Default (EAD).
Risk 7 – Acute Physical	The Bank’s liquidity risk due to the impact on financed projects caused by extreme weather events.	1. Reduction in the Bank’s liquidity ratio (current assets/current liabilities). 2. Decrease in the percentage of cash available to meet clients’ liquidity requirements (Acidity Test). 3. Critical levels of the cash ratio (liquid assets + equivalents / current liabilities).





TCFD Category	Risk Description	Impact Description
Risk 8 – Acute Physical	The Bank’s liquidity risk due to early withdrawals by customers to repair damage and cover losses caused by extreme weather events.	1. Reduction in the Bank’s liquidity ratio (current assets/current liabilities). 2. Decrease in the percentage of cash available to meet customers’ liquidity requirements (Acidity Test). 3. Critical levels of the cash ratio (liquid assets + equivalents / current liabilities).
Risk 13 – Acute Physical Risk	Credit risk due to increased losses in the portfolio exposed to sectors vulnerable to extreme weather events.	Increase in indicators: Loss Given Default (LGD), Probability of Default (PD), and Exposure at Default (EAD).



Financial Impact Assessment Methodology

We strengthen our climate assessment methodologies, tools, and criteria, aligning them with regulatory and market best practices. To this end, we have implemented a **specialized tool** that allows us to assess the criticality level of climate risks using a **stochastic, non-deterministic approach, which has remained in effect and unchanged since its adoption**, ensuring the consistency and comparability of the analyses conducted.

Unlike point estimates, this model accounts for future uncertainty and assigns probability distribution functions to the analyzed variables. This allows us to simulate ranges of outcomes in terms of frequency and severity, significantly strengthening **our** analytical capabilities.

For each prioritized risk, we identify the **climate parameters** associated with its cause, integrating **historical trends and future projections specific** to Colombia. These projections are based on highly rigorous technical sources, such as the scenarios from the Network of Central Banks and Supervisors

for a Greener Financial System (NGFS) and the models from the Intergovernmental Panel on Climate Change (IPCC), available through the platform of the International Institute for Applied Systems Analysis (IIASA).

Finally, we link climate data to our operational and financial variables, which allows us to estimate the financial impact on two fronts: **opportunity costs** (lost revenue) and **direct impacts** (potential losses in our portfolio due to extreme events that compromise our customers’ ability to pay).



Climate Change Management 2025

Throughout 2025, at Banco de Occidente we continue to make decisive progress in our climate management. Currently, we are consolidating the integration of climate risk into our comprehensive risk management system, working to incorporate it more consistently into strategic decision-making.



Key Progress and Actions 2025



Approximately **36,49%** reduction in **paper use** in offices compared to the 2022 baseline; this result is due to the strengthening of digital channels and platforms.



A **28,9%** reduction in **total emissions** compared to 2024 and approximately **44% compared to the 2022 baseline**.



Manufacturing **100% of credit cards with 85% recycled PVC**, promoting circular economy practices.



Strengthening of the **Planeta Azul Community** as a space for raising awareness and fostering citizen engagement in environmental.



Implementation of the **Environmental Education Program** for employees, focused on best practices for saving and the efficient use of natural resources.



Development of the **“Together It’s Possible — WWF”** course, aimed at biodiversity conservation and the adoption of responsible actions.



Promotion of **sustainable mobility** through the Try My Ride program, with the participation of more than 2.500 employees.



Promotion of responsible **water and energy** use through internal campaigns and the newsletter “On the Side of Those Who Act,” which recognizes offices with the best performance in resource.



Exposure of the portfolio to climate risks by sector

As part of the implementation of the TCFD recommendations and in accordance with the guidelines of the Colombian Banking Association, at Banco de Occidente we conducted a **detailed classification of our loan portfolio by economic sector, based on the International Standard Industrial Classification (ISIC)**. This analysis aims to assess and manage sectoral exposure to climate risks, considering the nature of the financed activities and their level of vulnerability to physical events and transition risks. We segment our portfolio into three exposure levels—high, medium, and low—which allows us to prioritize support efforts for risk management and the exploitation of opportunities with a positive fiscal impact in the short, medium, and long term for our clients.

This segmentation enables us to precisely identify the areas requiring greater attention and proactive management, facilitating strategic decision-making and the development of policies that strengthen our resilience and sustainability in the face of climate challenges. In line with these efforts, during 2024 we conducted stress tests by geography and sector, identifying latent risks in the portfolio that allowed us to establish mitigation plans to minimize our exposure.

As a result of this process, we found that the cost of provisions is significantly higher in an adverse scenario involving risks stemming from climate change than in the other scenarios evaluated, which reaffirms the need to integrate these variables into our long-term financial planning.

To strengthen this process, in 2025 the Bank developed a structured tool for identifying, assessing, and prioritizing physical and transition climate risks, applicable at both the sectoral and client levels. This methodology considers variables of exposure, sensitivity, and adaptive capacity, as well as geographic location, economic sector (ISIC), and reference climate scenarios, including scenarios for the transition to net-zero emissions. This allows for the estimation of inherent risk and its consistent classification, enhancing comparability and informed decision-making.

Additionally, the tool incorporates a risk management component that enables the identification of existing controls, the estimation of residual risk, and the assurance of traceability between identified climate risks, implemented mitigants, and remaining gaps. This approach facilitates the integration of climate risk into traditional risk management processes—such as credit analysis and sectoral assessment—in line with TCFD recommendations and international best practices.

1. The remaining 1% of the portfolio corresponds to wage earners, pensioners, and investors, who were not included in the sectoral classification.

High exposure to climate risk

25 Sectoral divisions, representing **39% of the total portfolio.**²

These activities are more vulnerable due to the nature of their production processes, their geographic location, or their dependence on climate-sensitive natural resources.



2. The adverse climate risk scenario considers a hypothetical scenario in which the economy and the financial system are affected by unexpected shocks and acute physical risks stemming from climate change.

Medium exposure to climate risk

15 Sectoral divisions, equivalent to **20% of the portfolio.**

Although less critical than high-risk sectors, they require specific mitigation and adaptation measures to adequately manage their climate exposure.

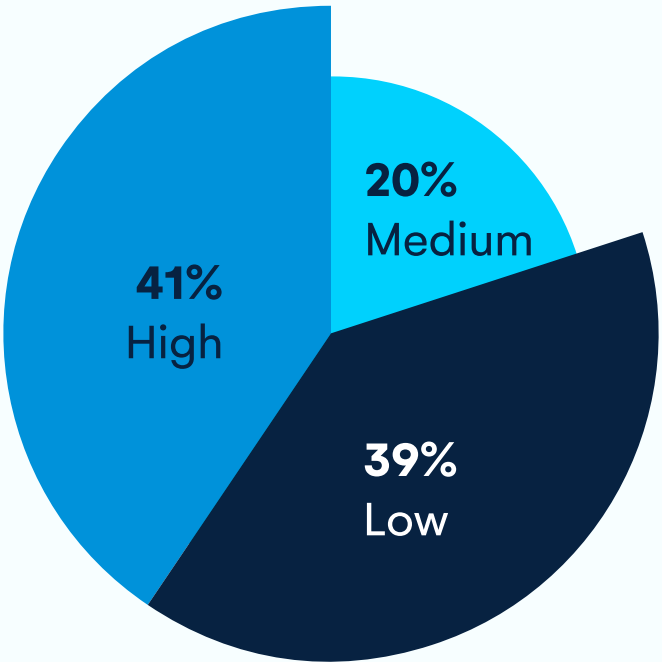


Low exposure to climate risk

53 Sectoral divisions, representing the **remaining 41% the portfolio**.

These activities show lower climate vulnerability, without prejudice to the need for continuous monitoring of potential changes in the environment.

Distribution of criticality according to portfolio percentage



This distribution is indicated in the portfolio criticality chart, which shows a significant concentration at the medium and high levels, reinforcing the importance of active climate risk management.

Trend Analysis of Climate Exposure (2022—2025)

To identify trends in the portfolio’s exposure, we conducted a comparative analysis for the years 2022, 2023, 2024, and 2025, revealing the following findings:

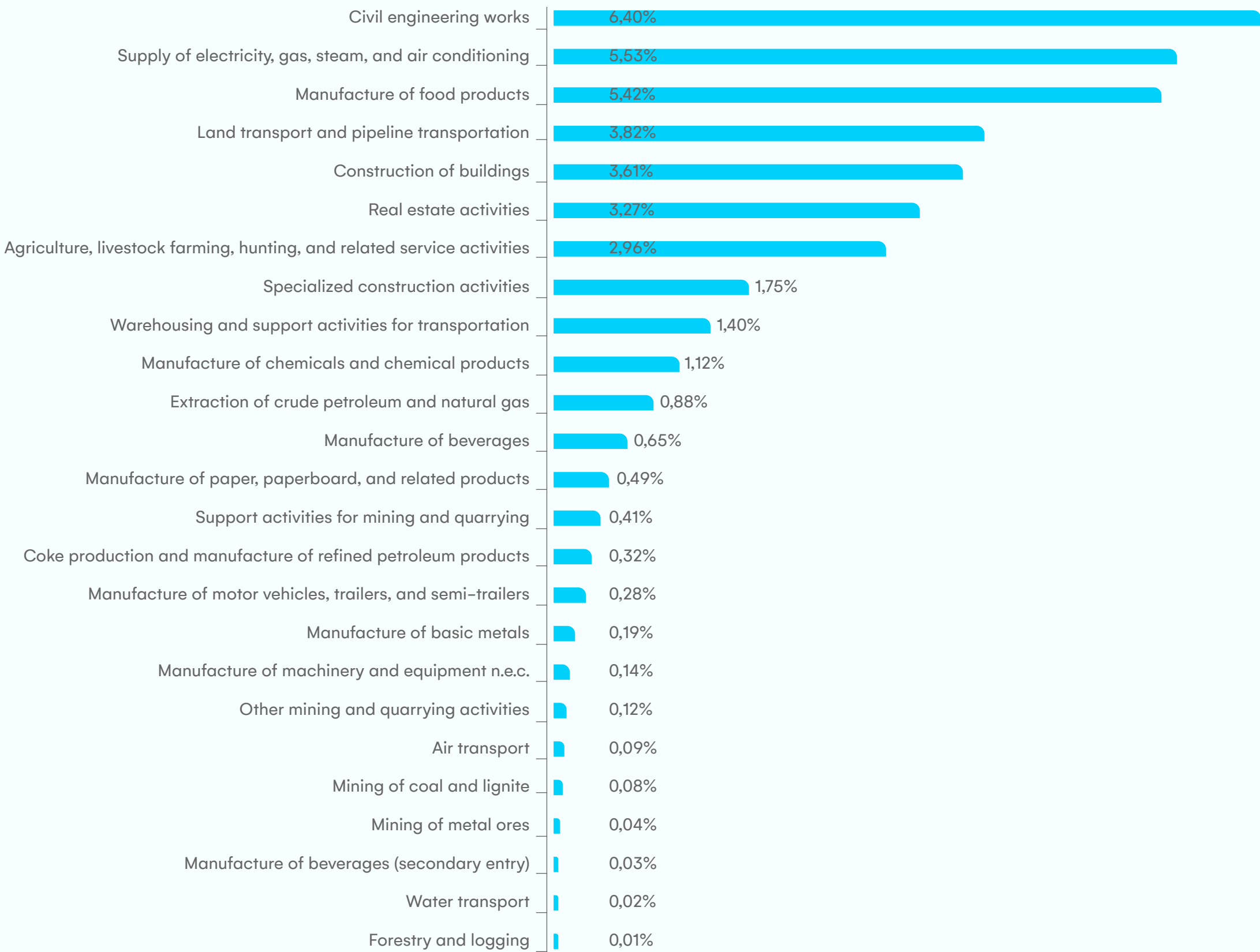
- ✓ The percentage of the portfolio classified as medium climate risk increased by 10 percentage points in 2024 compared to the levels observed in 2022 and 2023, and remains stable in 2025.
- ✓ This increase is due to a greater concentration in divisions associated with:
 - Water collection, treatment, and distribution, including the operation of irrigation canals, water purification, and the supply of water for domestic and industrial use, which is linked to the water crisis currently affecting the country, as evidenced by water rationing in Bogotá.
 - Installation, maintenance, and specialized repair of machinery and equipment.
 - Manufacture of other non-metallic mineral products, activities related to the gradual recovery of the construction sector following the COVID-19 pandemic.

Key sectors at high climate risk in 2025

In 2025, the five divisions with the highest exposure to climate risk account for nearly **25%** of the total portfolio value, with the same categories identified

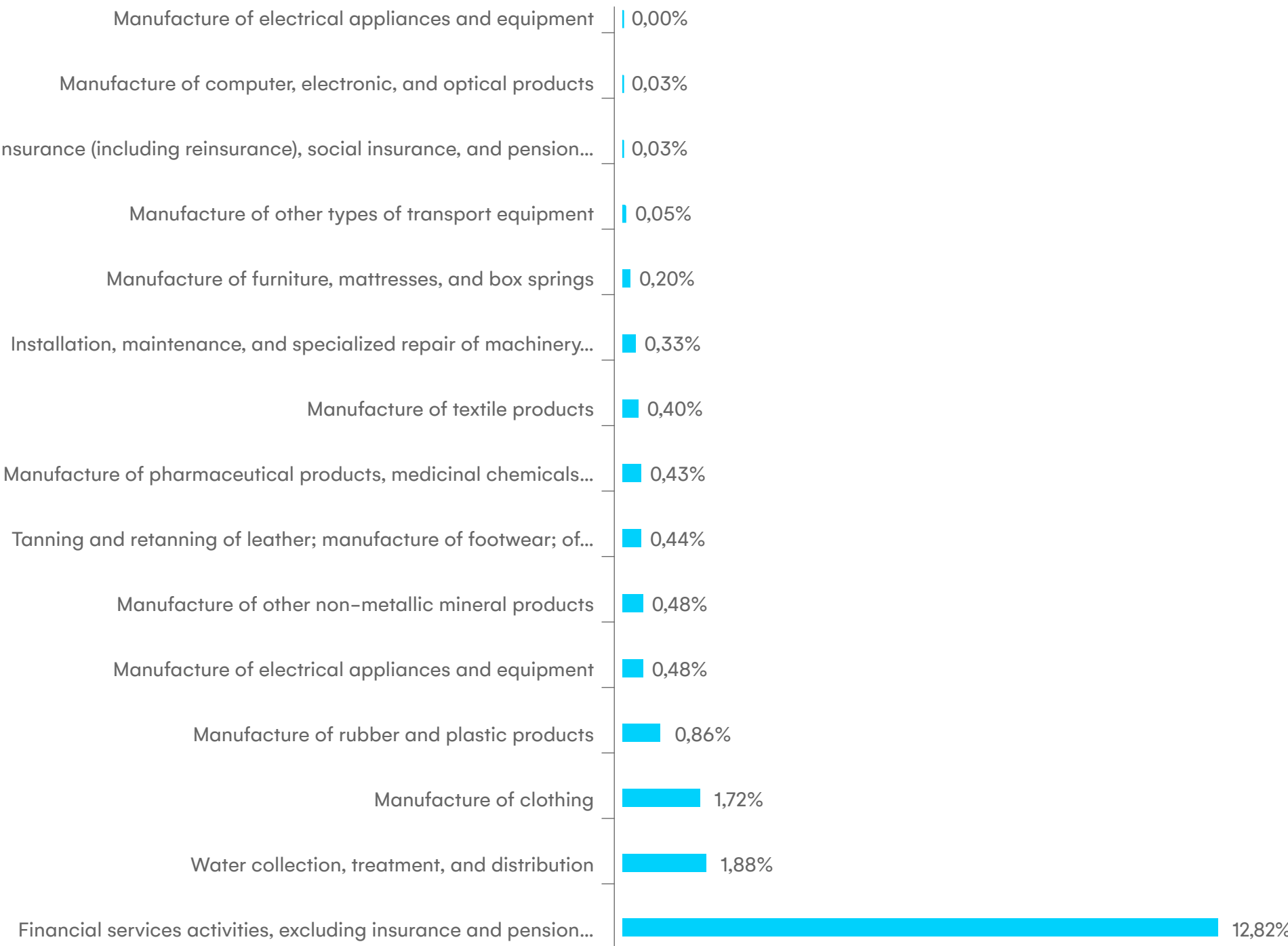
in 2024 remaining, although with changes in their relative order. **Civil engineering works** now ranks first in terms of exposure, while **food manufacturing** drops to third place. The **Transportation, Building Construction, and Electricity, Gas, Steam, and Air Conditioning Supply** sectors remain within the group with the highest exposure, demonstrating a consistent sectoral concentration regarding climate risk.

Distribution of high criticality according to portfolio percentage





Distribution of medium criticality according to portfolio percentage



A. Civil Engineering and Building Construction

The **civil engineering and building construction** sectors account for a significant portion of the Bank’s portfolio and share **significant exposure to climate risks**, given their dependence on physical assets, natural resources, and environmental conditions. In **2025**, the civil engineering sector reached a **criticality level of 6,40%, ranking first, up from third place in 2024**, indicating an increase in its relevance within the portfolio’s climate exposure. Meanwhile, the **building construction** sector remained in **fifth place**, with a criticality of **3,61%**, showing relative stability compared to the previous year.

From a **transition risk** perspective, both sectors face growing pressure to incorporate low-emission construction technologies and energy efficiency criteria, which implies greater investments and adjustments to business models. Added to this is a greater market preference for sustainable projects, which may affect demand for projects that do not incorporate stricter environmental standards and limit access to financing for carbon-intensive activities.

Regarding **physical risks**, exposure to extreme weather events such as heavy rains, floods, droughts, and, in the long term, sea-level rise can lead to project delays, higher construction, insurance, and maintenance costs, as well as impacts on the productivity and viability of infrastructure. These factors underscore the need to advance resilient designs and construction practices adapted to current and future climate conditions.





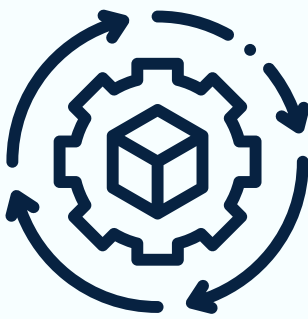
Climate Change Risks for Sector A

Type of risk		Threats	Consequences	Impact
Transition risk	Technological risk	✓ Replacement of existing products and services with less emission-intensive options. ✓ High cost of transitioning to lower-emission technologies, as the sector is a major energy consumer.	✓ Capital investments for technological upgrades toward lower-carbon solutions. ✓ The emergence of new technologies may give rise to new business models, altering the sector's supply and demand for goods and raw materials. ✓ Research and development expenses will increase, impacting companies' cost structures.	✓ Risk of falling behind in emerging markets due to outdated technological infrastructure and lower penetration of low-carbon technologies. ✓ Consumers will prefer companies with products that have a lower carbon footprint or natural substitutes. Lower demand for thermally inefficient properties by large corporations, reducing revenue. ✓ The production of materials such as steel, iron, and cement requires high energy consumption and significant investments in R&D to improve efficiency or carbon capture technologies. ✓ Higher insurance premiums and stricter exclusion clauses for commercial properties not adapted to new technologies.
	Market Risk	✓ Changes in consumer behavior cause a rapid decline in domestic and international demand for products with high greenhouse gas emissions. ✓ Uncertainty in market signals and sudden price changes.	✓ Demand for construction materials such as iron, cement, and stone aggregates depends on economic development and population growth, which will continue in underdeveloped economies. ✓ Demand for low-carbon products will increase in developed economies.	✓ Infrastructure not adapted to new climate conditions will face higher insurance costs. Carbon-intensive subsectors will struggle to secure financing, losing competitiveness. ✓ Improvements in recycling and the adoption of a circular economy will create a market for recycled raw materials that are more economical and competitive in terms of price and environmental impact. ✓ Increased quality requirements and demand for specialized metals in sectors such as transportation. ✓ Decreased demand for office and commercial spaces, impacting revenue from the sale and rental of these spaces.





Type of risk		Threats	Consequences	Impact
	Reputational risk	✓ Stigmatization of subsectors or modes of transportation associated with high emissions. ✓ Negative feedback from investors due to changes in consumer and community preferences, as well as improved risk incorporation in the sector, forcing changes to the business model.	✓ Inability to attract financing due to a negative reputation associated with a carbon-intensive subsector. ✓ Decline in demand for unsustainable buildings. ✓ Accelerated depreciation of infrastructure associated with high emissions.	✓ Difficulty for the sector in obtaining financing. ✓ Higher interest rates for carbon-intensive subsectors. ✓ Difficulty attracting customers due to shifting consumer preferences and the stigmatization of carbon-intensive products. ✓ Loss of value of assets with a negative reputation (i.e., infrastructure with low energy efficiency and high carbon emissions).
Physical risks	Acute risk	✓ Heavy rainfall causes hydrological risks such as floods, flash floods, and high river flows, as well as geotechnical risks such as landslides and mudslides. ✓ Low rainfall in certain regions causes water stress, leading to water scarcity and the disappearance of rivers. ✓ Prolonged heat waves increase the frequency of wildfires and their rapid spread.	✓ An increase in natural disasters will transform supply and demand and require the reconstruction and repair of infrastructure. ✓ Adverse weather events can cause price shocks and inflation in raw materials and services. ✓ Adverse weather conditions are key factors in construction delays and increase costs throughout the value chain.	✓ Damage to infrastructure from adverse weather events can extend timelines and increase construction costs. ✓ Increased accident rates and health and safety risks for employees, raising operational costs. ✓ Expectations of severe weather events can affect property values and increase credit risks.
	Chronic risk	✓ Rising sea levels are impacting the country's cities and coastal regions. ✓ Rising temperatures affect the adaptive capacity of ecosystems, reducing the provision of ecosystem services, such as water generation and carbon sequestration. ✓ Temperature increases in the medium and long term make climate prediction difficult and cause instability in human activities. ✓ Changes in hydrological regimes, altering water availability and precipitation patterns.	✓ Adverse weather events affect cost and investment structures, reducing productivity and efficiency in construction projects. ✓ Adverse weather events can disrupt the production, distribution, and marketing of construction materials, hindering the efficiency of construction processes and the integration of the various project phases. ✓ Extreme weather events can reduce or disrupt habitability and work capacity, preventing outdoor work and the free movement of employees.	✓ Severe natural disasters will transform supply and demand and require infrastructure reconstruction. ✓ Adverse weather events can cause price shocks and inflation in raw materials and services. ✓ Adverse weather conditions delay construction and increase costs throughout the value chain. ✓ Increased precipitation raises costs due to downtime and water treatment. ✓ Expectations of severe weather events may affect property values and increase credit risks.



B. Electricity, Gas,
Steam, and Air
Conditioning Supply

The electricity, gas, steam, and air conditioning supply sector is strategic for the functioning of the economy and the well-being of society, as it provides essential services to households, industry, and regions. In Colombia, this sector includes the generation, transmission, and distribution of electricity, the production and distribution of gas, and the supply of thermal services, all of which are highly relevant to the continuity of economic operations.

From a **transition risk** perspective, the sector faces challenges associated with rapid technological transformation and shifts in market preferences. The decline in renewable energy costs and the

need to transition away from fossil fuel-based technologies create risks of asset obsolescence, pressure on profitability, and a reconfiguration of the energy supply. Additionally, volatility in energy and commodity prices, along with regulatory uncertainty, can affect the viability of certain business models, while reputational risks associated with carbon-intensive activities influence the decisions of investors and consumers.

Regarding **physical risks**, the country's high dependence on hydroelectric generation exposes the sector to climate events such as prolonged droughts, water stress, floods, and heat waves, which can affect

resource availability, operational efficiency, and the integrity of energy infrastructure. In the long term, chronic risks such as rising average temperatures, changes in precipitation patterns, and sea-level rise may cause structural disruptions in the energy supply chain and higher adaptation costs.

As a result of this analysis, in **2025** this sector is classified as **high-risk**, representing **5,53% of the Bank's portfolio**, which reinforces the need for continuous monitoring, proactive management of climate risks, and support for clients in their transition toward more resilient and sustainable energy models.

Climate Change Risks for Sector B

Type of risk		Threats	Consequences	Impact
Transition risk	Technological risk	✓ Declining prices for renewable energy generation technology. ✓ Cost of the transition to lower-emission technology, increasing annual depreciation costs.	✓ The drop in prices for renewable energy production technology impacts demand and revenue from fossil fuel-based energy production. ✓ Current infrastructure is becoming outdated and uncompetitive. ✓ The fossil fuel business model could be severely impacted financially.	✓ Production efficiency favors renewable energy companies and negatively affects fossil fuel companies. ✓ Technological changes make it difficult to predict fuel and energy demand, leading to unfavorable auction sales for producers. ✓ Generating companies face depreciation and loss of infrastructure. ✓ Production, maintenance, and distribution costs are rising due to outdated technologies.





Type of risk		Threats	Consequences	Impact
	Market risk	✓ Rapid decline in domestic demand for fossil fuels due to an accelerated transition toward decarbonization. ✓ Increase in the cost of raw materials for electricity generation from fuels. ✓ Change in asset valuations as companies and investors increasingly incorporate climate risks and emissions pricing into asset valuations. ✓ Fluctuations in energy prices due to the integration of renewable energy.	✓ Potential changes in the players in the energy market. Changes in the sector's supply and demand structure that favor renewable energy. ✓ Decrease in tax revenues dependent on the fossil fuel sector.	✓ Possible changes in the players in the energy market. Changes in the sector's supply and demand structure that favor renewable energy. ✓ Decrease in tax revenues dependent on the fossil fuel sector.
	Reputational risk	✓ Stigmatization of subsectors associated with high emissions due to shifting perceptions toward a low-carbon economic transition. ✓ Negative feedback from investors in the sector forcing changes to the business model.	✓ Sectors such as coal and oil production will see a reduction in the flow of resources from direct or indirect investment. ✓ Changes in the business model due to growing climate-related financial risks for investors. ✓ Shifting consumer preferences may reduce demand for fossil fuels due to a negative reputation.	✓ Reduced demand and returns in greenhouse gas-intensive sectors. ✓ Increased operating costs due to difficulty attracting labor, reduced available capital, loss of asset value, and lower returns due to negative reputation. ✓ Disruption of supply chains by companies that have not adapted to low-carbon models.
Physical risks	Acute risk	✓ Heavy rainfall can lead to hydrological and geotechnical risks. ✓ Prolonged periods of low precipitation can lead to water stress and reduced river flow. ✓ Increase in wildfires due to low precipitation and rising temperatures. ✓ Prolonged heat waves due to rising global average temperatures.	✓ Heavy rainfall can lead to hydrological and geotechnical risks. ✓ Prolonged periods of low precipitation can lead to water stress and reduced river flow. Increased wildfires due to low precipitation and rising temperatures. ✓ Prolonged heat waves due to rising global average temperatures.	✓ Disruption of transportation and distribution systems. Volatility in energy prices and instability in the country's energy security due to climate impacts. ✓ Decreased demand for fuels due to disruptions in the economic system. ✓ Increased operating costs in coal mining due to excessive rainfall. ✓ Damage to pipelines and power grids, and damage to infrastructure from strong winds, causing disruptions in the supply chain.



Type of risk		Threats	Consequences	Impact
	Chronic risk	✓ Rising sea levels impact the country's coastal cities and territories. ✓ Loss of ecosystem adaptive capacity due to prolonged and accelerated temperature increases, affecting the structure and regenerative capacity of natural systems. ✓ Variations in water availability patterns, altering the frequency and intensity of precipitation in the long term.	✓ Adverse weather events affect costs and investments, reducing productivity and efficiency in fossil fuel subsectors. ✓ Disruption of value chains due to adverse weather events, interrupting production, distribution, and marketing. ✓ Adverse climate events destroy and damage physical assets and infrastructure, increasing geotechnical risks due to erosion and loss of vegetation cover, affecting the stability of energy infrastructure	✓ Decrease in energy demand for heating and increase in demand for cooling. Conflicts with communities over scarce resources such as water. ✓ Changes in seasonal energy demand and increases in peak demand during periods of extreme heat or other conditions. ✓ Water stress and higher water temperatures reduce energy production and operational capacity in thermal generation. ✓ Increased electricity losses in transmission and distribution due to thermal load.



C. Food Processing

Food processing is a key sector for the country's food security and economic development, but it is highly exposed to climate risks that can impact its financial and operational performance. In 2025, this sector accounted for 5,42% of the Bank's portfolio, ranking third in terms of criticality, down from first place in 2024, reflecting a shift in risk composition and concentration.

From a transition risk perspective, the sector faces pressures associated with the adoption of lower-emission technologies, shifts in consumer preferences toward more sustainable products, and commodity price volatility—factors that directly affect costs, demand, and business models. In terms of physical risks, exposure to droughts, floods, and heat waves remains significant, with potential impacts on production cycles, the availability of inputs, and the stability of supply chains.

Additionally, the legal and reputational risks associated with compliance with environmental regulations and market expectations reinforce the need for proper management of these factors to

preserve the sector's competitiveness. During 2024, the Bank developed climate resilience tests specific to the agri-food sector, considering scenarios of drought and variability in precipitation. In 2025, the criteria, assumptions, and results of this assessment were maintained, and they continue to serve as a valid reference for guiding risk management and strengthening the resilience of the portfolio exposed to this sector.





Climate Change Risks for Sector C



Type of risk		Threats	Consequences	Impact
Transition risk	Technological risk	✓ Limited availability and adoption of low-emission technologies. ✓ Rapid technological obsolescence that may affect recent investments. ✓ Loss of competitiveness for companies that do not adopt low-carbon solutions.	✓ Limited availability and adoption of low-emission technologies. ✓ Rapid technological obsolescence that may affect recent investments. ✓ Loss of competitiveness for companies that do not adopt low-carbon solutions.	✓ High investment costs associated with technological modernization. ✓ Loss of value of assets that are inefficient in terms of emissions. ✓ Risk of falling behind more technologically advanced markets. ✓ Lower productivity and supply chain disruptions due to delays in technology adoption.
	Market risk	✓ Shifts in consumer preferences toward lower-emission products. ✓ Increased input costs due to lower productivity and volatility in commodity prices. ✓ Increased demand for sustainable substitutes.	✓ Decreased demand for carbon-intensive products. ✓ Entry of new competitors with sustainable offerings. ✓ Loss of competitiveness compared to products certified as sustainable or carbon neutral.	✓ Decreased demand for carbon-intensive products. ✓ Entry of new competitors with sustainable offerings. ✓ Loss of competitiveness compared to products certified as sustainable or carbon neutral.
	Reputational risk	✓ Increased cost of capital for emission-intensive activities. ✓ Lower productivity in crops and processes that are not adapted. ✓ Increased operating costs and pressure on margins.	✓ Decreased demand and reduced appeal to investors. ✓ Difficulties accessing financing for carbon-intensive subsectors. ✓ Decreased demand for products perceived as unsustainable.	✓ Reduced demand and lower investor appeal. ✓ Difficulties accessing financing for carbon-intensive subsectors. ✓ Decreased demand for products perceived as unsustainable.



Tipo de riesgo		Amenazas	Consecuencias	Impacto
Physical risks	Acute physical risk	✓ Increased frequency and intensity of extreme weather events such as heavy rainfall, prolonged droughts, wildfires, and heat waves. ✓ Prolonged periods of low precipitation leading to water stress. ✓ Increase in fires associated with drought conditions and high temperatures. ✓ Prolonged heat waves resulting from the rise in global average temperatures.	✓ Increased frequency and intensity of extreme weather events such as heavy rainfall, prolonged droughts, wildfires, and heat waves. ✓ Prolonged periods of low precipitation leading to water stress. ✓ Increase in wildfires associated with drought conditions and high temperatures. ✓ Prolonged heat waves resulting from rising global average temperatures.	✓ Disruption of food production due to severe weather events. ✓ Loss of inventory and assets due to operational disruptions and impacts on local economies. ✓ Damage to road and connectivity infrastructure, hindering the marketing and distribution of products.
	Chronic physical risk	✓ Disruption of food production due to severe weather events. ✓ Loss of inventory and assets due to operational disruptions and impacts on local economies. ✓ Damage to road and connectivity infrastructure, hindering the marketing and distribution of products.	✓ Gradual sea-level rise impacting coastal cities and territories. ✓ Loss of ecosystem adaptive capacity due to sustained temperature increases. ✓ Rise in average temperatures in the medium and long term. ✓ Structural changes in hydrological regimes that alter the frequency and intensity of precipitation.	✓ Persistent disruption of food systems by affecting agricultural cycles. ✓ Deterioration in crop quality, reduced yields, and shorter harvest periods. ✓ Loss of soil fertility in certain regions. ✓ Decreased livability and labor capacity due to extreme weather conditions.



D. Land Transport, Pipeline Transport

The land transport and pipeline transport sector plays a key role in the country’s connectivity, logistics, and economic development by facilitating the movement of people, goods, and resources between regions. This sector includes activities such as rail transport, public motor vehicle transport, and the transport of fuels and other inputs via pipelines, and is highly



dependent on physical infrastructure and intensive energy use.

In **2025**, the Bank’s portfolio exposure associated with this sector reached a criticality level of **3,82%**, showing an increase from the **3,6%** recorded in **2024**, which reflects the sector’s heightened sensitivity to risks stemming from climate change.

From a **transition risk** perspective, the sector faces growing pressure to reduce its emissions by adopting cleaner technologies, such as electric vehicles, hydrogen-based solutions, or biofuels. While cost reductions in these technologies facilitate the transition, challenges persist due to a lack of infrastructure, incentives, and technical capabilities, which may affect the competitiveness of players that maintain carbon-intensive models. Additionally, changes in consumer preferences and reputational pressure can impact demand and access to financing.

In terms of **physical risks**, the sector is particularly vulnerable to extreme weather events such as heavy rains, floods, landslides, droughts, and wildfires, which can damage road and transportation infrastructure, disrupt supply chains, and increase operational and maintenance costs. In the context of climate resilience testing, this sector showed the **greatest average impact from variations in precipitation** compared to other evaluated sectors, reinforcing the need to strengthen infrastructure resilience and the management of these risks over time.

Climate Change Risks for Sector D

Type of risk		Threats	Consequences	Impact
Transition risk	Technological risk	✓ Investment in low-carbon technologies is increasing, while investment in emission-intensive technologies is declining. ✓ Production costs for electric vehicles, hydrogen, and biofuels have fallen and are expected to continue to decline over the next decade. ✓ Lack of incentives for innovation and the adoption of low-carbon technologies in the sector.	✓ The decline in production and marketing costs for low-carbon transport will negatively impact the revenues of high-emission transport subsectors. ✓ The lack of electric charging infrastructure hinders the flow of resources and incentives for market participants to adopt electric technologies in transportation. ✓ If key sector players fail to adopt efficient, low-carbon technologies due to a lack of incentives, they could lose regional and local competitiveness.	✓ The use of railways and vehicles powered by low-carbon fuels (hydrogen, electricity, biofuels) is encouraged. ✓ Large-scale production of electric vehicles reduces prices and facilitates their adoption. Significant investments in infrastructure and technology upgrades to produce low-carbon vehicles. ✓ Depreciation and loss of assets associated with high emissions, and loss of market value for inefficient companies. ✓ Increased costs in production, maintenance, and distribution due to the use of obsolete fossil fuel-based transportation technologies. ✓ Supply chain inefficiencies due to delays in adopting new low-carbon technologies.
	Market risk	✓ The accelerated transition toward decarbonization will significantly reduce demand for carbon-intensive transportation systems. ✓ International pressures will drive public policies that aggressively increase fossil fuel prices. ✓ Companies and investors will incorporate climate risks and emissions pricing into their valuations and investment decisions, due to growing awareness of climate change.	✓ Decline in the valuations of high-emission assets in the sector. ✓ Changes in the supply and demand structure that will favor low-carbon transportation, such as vehicles powered by electricity, hydrogen, and biofuels, as well as rail networks. ✓ Decline in the value of carbon-intensive assets such as gasoline, diesel, or petro-diesel vehicles.	✓ Sectoral and competitive restructuring in international markets toward more sustainable modes of transportation. ✓ Inventories left idle due to reduced demand for carbon-intensive transportation. Investments in high-emission transportation fail to generate expected returns. Supply chain inefficiencies due to imbalances in the supply and demand for high-emission transportation. ✓ Exit of market participants who are not prepared for the new business model.



Type of risk		Threats	Consequences	Impact
Physical risks	Reputational risk	✓ Consumer and community perceptions of a company's contribution to the transition to a low-carbon economy lead to the stigmatization of high-emission modes of transport. ✓ Changes in consumer and community preferences, coupled with improved risk management, will lead investors to divest and reduce resource flows in high-emission subsectors.	✓ Inability to attract financing due to a negative reputation associated with a carbon-intensive subsector. ✓ Decline in demand for carbon-intensive transportation due to consumer movements and pressure, as seen in Europe.	✓ Shifting consumer preferences may reshape the use of transportation modes. Reduced demand for carbon-intensive transportation leads to price volatility. ✓ Increased cost of capital for carbon-intensive transport companies. Loss of value of assets with a negative reputation. ✓ Difficulty attracting customers due to shifts in consumer preferences and the stigmatization of carbon-intensive transportation.
	Acute physical risk	✓ High and intense rainfall creates hydrological risks (floods, flash floods) and geotechnical risks (landslides, mudslides). ✓ Prolonged low rainfall causes water stress, drastically reducing river flow and causing rivers to dry up. ✓ Increase in wildfires: dry conditions due to lack of rain and high temperatures facilitate the rapid spread of wildfires. ✓ Rising global temperatures intensify and increase the frequency of heat waves.	✓ Adverse weather events affect production, distribution, and marketing, hindering the efficiency of production processes. ✓ Extreme weather events reduce livability and the ability to work outdoors or move about freely. ✓ Adverse weather events destroy and disrupt the functioning of physical assets and service infrastructure.	✓ Increased transportation costs due to new safety measures to address adverse weather events. ✓ New routes that may be longer or less efficient due to adverse weather events on usual routes. Unpaved roads are vulnerable to weather factors, especially increasingly intense rainfall that causes landslides and supply chain disruptions. ✓ The increase in adverse weather events can raise shipping and transportation costs across all stages of the supply chain.
	Chronic physical risk	✓ Rising sea levels affecting the entire coastal region of the country. ✓ Rapidly rising temperatures affect the structure and regenerative capacity of ecosystems, reducing services such as water resources and carbon storage. ✓ Global warming affects weather forecasting and causes instability. Variations in water availability alter the frequency and intensity of precipitation in the long term.	✓ Adverse weather events cause disruptions in production, distribution, and marketing, hindering the efficiency of production processes. ✓ Extreme weather events reduce livability and the ability to work outdoors or move about freely. ✓ Adverse weather events destroy and disrupt the functioning of physical assets and service infrastructure.	✓ Increased costs for business travelers and freight due to adverse weather conditions. ✓ Increased need for cooling systems and associated costs in underground transportation systems due to rising temperatures. ✓ New costs for maintenance and redesign of paved roads due to degradation caused by temperatures exceeding design thresholds. Increased training costs for preparedness and mitigation of climate events in transportation infrastructure.

Opportunities arising from climate change

In 2025, we maintained our **decarbonization and climate resilience roadmap** developed in 2023, which is the result of a comprehensive analysis where we identified market best practices and mapped existing initiatives within the Bank.

We presented the identified opportunities as **adaptation and mitigation measures**, aimed at supporting our management of financial risks associated with climate change, in alignment with the TCFD recommendations. These opportunities remain relevant for strengthening the resilience of our business, the development of products and services, and efficiency in the use of resources.

Level of progress in each phase of the climate strategy

Advanced 

In progress 

Under review 

Identified financial risk	Opportunity (A) Adaptation / (M) Mitigation	TCFD Opportunity Type	Metrics	Level of progress
R1, R3	(A) Establish criteria for granting loans and refinancing to customers in sectors vulnerable to extreme weather events.	Resilience	% of credit lines with criteria / Total credit lines	(UNDER REVIEW)
R4, R6	(A) Include the occurrence of extreme weather events in short, medium, and long-term cash flow projections.	Resilience	Short-, medium-, and long-term projections	(IN PROGRESS)
R2, R3	(A,M) Design of credit lines for financing climate emergencies.	Products and services	% of credit lines designed with emergency financing / Reduced indirect GHG emissions	(UNDER REVIEW)
R9, R10	(A,M) Establish criteria, policies, and/or programs for the procurement of sustainable goods and services at the Bank.	Resilience; Resource efficiency; Energy sources; New markets	# of low-carbon goods and services procured / Total goods and services	(UNDER REVIEW)
R5, R7, R8, R10	(A,M) Financing of sustainable low-carbon initiatives (sustainable mobility, technological innovation, green bonds, clean energy, energy efficiency, and nature-based adaptation).	Products and services	% of sustainable financing / total financing; Reduced GHG emissions	(ADVANCED)



Identified financial risk	Opportunity (A) Adaptation / (M) Mitigation	TCFD Opportunity Type	Metrics	Level of progress
R10, R12	(A,M) Active participation in public policy and projects led by regulators regarding climate change.	Resilience	# of requirements managed; # of event participations; # of statements and regulations identified	(UNDER REVIEW)
R4, R6	(A,M) Program for managing climate risks for clients.	Products and services	Program designed; # clients enrolled in the program / # total clients	(UNDER REVIEW)
R7, R8	(A,M) Program for mitigation, offsetting, and decarbonization among customers.	Products and services	Program designed; # of customers enrolled in the program / # of total customers; Emissions reduced	(UNDER REVIEW)
R5, R7, R8, R10	(A,M) Green services: technical consulting and programs that promote the sustainable use of resources.	Products and services	% of green services / total services; Client certifications and/or accreditations; Reduced GHG emissions	(UNDER REVIEW)

Level of progress in each phase of the climate strategy

Advanced

In progress

Under review



Potential financial products and services related to climate change

To address the various identified climate risks, at Banco de Occidente we analyze financial products and services aimed at **strengthening resilience and mitigating climate change within our portfolio**. Through these initiatives, we seek to support our clients in their transition toward more sustainable models and enhance their ability to adapt to extreme weather events, in line with our decarbonization roadmap and the TCFD recommendations.

- ✓ Financing that drives the adoption of renewable energy and energy efficiency.
- ✓ Financial initiatives that boost clients’ resilience to extreme weather events.
- ✓ Financial products that promote regenerative agriculture.
- ✓ Products or services that strengthen the sustainable value chain.
- ✓ Credit lines aimed at increasing the adoption of sustainable mobility.
- ✓ Advisory services to identify climate risks and develop mitigation and adaptation strategies.

Sustainable Financing

In 2024, at Banco de Occidente, we developed our **Sustainable and Transition Taxonomy**, using Colombia’s Green Taxonomy and the one designed by IDB Invest as references. Our goal is to capitalize on opportunities arising from climate change, reduce associated financial risks, and support our clients in their decarbonization process.

Our taxonomy includes eight eligibility criteria, focused on both climate change mitigation and adaptation, and we have indicators and calculation methodologies that allow us to adequately monitor our progress.



Eligibility Criteria	Description	Short-term opportunity	Portfolio balance 2025
Energy efficiency	Automation and control of electrical and mechanical systems. Heat recovery for hot water (from air conditioning systems, heat pumps or refrigeration systems, air compressors). Upgrading air conditioning and refrigeration equipment with refrigerants with very low global warming potential (GWP). Projects involving the use of biofuels or biogas.	X	\$47.709.134.593
Renewable energy	Companies that design, sell, and install renewable energy solutions (excluding consumer financing). Residential, commercial, and industrial wind energy in distributed applications, direct mechanical applications, or grid feed-in.	X	\$383.628.595.819
Green buildings	Green buildings, including residential, social housing, and commercial buildings, certified under eligible schemes such as LEED Gold or higher, LEED for Neighborhoods, Casa Colombia, or other associated certifications.	X	\$597.687.932.825
Sustainable water management	Water supply systems: New comprehensive systems or improvements to existing systems for water collection, conveyance, treatment, storage, transmission, and distribution. Technologies that result in a reduction of at least 20% in annual water consumption.	X	\$445.092.779.191



Eligibility Criteria	Description	Short-term opportunity	Portfolio balance 2025
Waste management	Initiatives for the collection and cleaning of recovered materials and returnable container systems.	X	\$11.600.557.747
	Design and implement post-disaster recovery and reconstruction plans that take climate change into account.		
	Value chains that support small-scale producers and local agriculture.		
Clean transportation	Public or personal hybrid or electric vehicles and natural gas vehicles.	X	\$275.681.302.316
	Intermunicipal freight transport with zero direct emissions.		
	Construction and maintenance of zero-emission transportation infrastructure (subway, buses, trams, trains, among others).		
Sustainable agriculture	Good livestock practices, feed management, animal selection, and breeding.	X	\$18.306.991.980
	Sustainable agriculture and agricultural inputs (seeds and fertilizers).		
	Agricultural production focused on ecosystem protection.		
Biodiversity and natural resource protection	Sustainable forest management, protection of forests and seed orchards.	X	\$109.592.007.523
	Protection and restoration of terrestrial and freshwater ecosystems, biodiversity, habitats, and soil.		
	Disaster risk reduction and climate adaptation projects.		

In 2025, we continued the process of formalizing and progressively sharing our Taxonomy with our stakeholders, with the aim of strengthening transparency and the management of information related to sustainable and transition financing.





Strengthening resilience to climate change

We recognize the variability of information associated with climate change and its potential impacts; therefore, at Banco de Occidente, we have implemented a set of initiatives aimed at strengthening the resilience of our strategy and our climate risk management.



Analysis and monitoring	Strengthening internal capabilities	Management and response
✓ Periodic updating of climate risk assessments using prioritized scenarios. ✓ Analysis of portfolio exposure by sector and geography to identify the most vulnerable segments. ✓ Periodic assessment of opportunities arising from climate change.	✓ Communication of risks and opportunities to the responsible departments. ✓ Awareness-raising and training sessions targeted at key departments. ✓ Expert support for the review of action plans and internal initiatives.	✓ Implementation of measures to avoid, prevent, or mitigate the most material climate risks.

Risk Management

Given the significance of climate risks for Banco de Occidente and the vulnerability of its portfolio, the integration of these risks into the organization’s risk culture has been strengthened. In this context, the Vice Presidency of Risk and Collections has been progressively involved in the different stages of identifying, measuring, and monitoring risks related to climate change, in line with the Bank’s comprehensive risk management model.

Climate risk management is documented in the **Risk Appetite Framework**, enabling its integration with strategy, decision-making, and continuous monitoring. This process is structured in five stages, which aim to ensure consistent management aligned with the TCFD recommendations:

Stage	Description
Risk Identification	Identification of climate risks relevant to the Bank, considering physical and transition risks, as well as their relationship to the portfolio’s exposure in the short (2025), medium (2030), and long term (2050). In 2025, we updated our double materiality analysis, which assessed sustainability risks and opportunities, including climate-related issues. As a result of this exercise, emissions management and climate change were identified as material issues for the Bank.
Risk Measurement	Measurement of identified climate risks through the application of climate stress scenarios, aimed at assessing potential impacts on financial and risk variables.
Definition of appetite and limits	Definition of climate risk appetite and operational limits.
Strategic and business alignment	Integration of climate risks into strategic planning, taking into account projections, strategic objectives, and business guidelines, in order to strengthen the Bank’s resilience.
Monitoring and analysis of deviations	Periodic monitoring of risk appetite, defined limits, and the evolution of climate risks, as well as analysis of deviations from established parameters and their potential impact on strategy and business.



Climate Change Risk Management Cycle

Since 2024, we have consolidated our structured roadmap for the identification, prioritization, assessment, and management of climate-related risks and opportunities. This roadmap remains fully in effect for 2025, closely aligned with Banco de Occidente’s comprehensive risk management model, which allows us to ensure constant oversight and an agile response to environmental challenges.

1. Identification of risks and opportunities:

An initial assessment of climate-related risks and opportunities through 2050 was conducted based on a comprehensive analysis that included:

- A. Analysis of market trends, regulatory frameworks, national commitments, and best practices in the financial sector.
- B. Annual review of the portfolio’s sectoral profile, considering emissions generated, vulnerability levels, and loan amounts, among other factors.
- C. Analysis of the processes, roles, and responsibilities of the teams involved in risk management.
- D. Alignment of the identified risks and opportunities with the classification proposed by the TCFD, distinguishing between physical and transition risks, as well as associated opportunities, with an emphasis on those aimed at mitigating GHG emissions and/or adapting to climate change.

2. Assessment and prioritization of risks and opportunities:

The identified climate-related risks and opportunities were assessed and prioritized based on technical and financial criteria, considering:

- A. The selection of **prioritized climate-related scenarios** for the analysis. At Banco de Occidente, we prioritized three scenarios proposed by the Network for Greening the Financial System (NGFS).



Category	Scenario	Estimation	Policy response	Technological change	Carbon dioxide removal	Changes in regional policy
Orderly	Net Zero	1,5 °C	Immediate and gradual	Rapid change	Medium usage	Moderate variation
Orderly	Below 2 °C	1,7 °C	Immediate and mild	Moderate change	Medium use	Low variation
Disorderly	Net-zero divergence	1,5 °C	Immediate but divergent	Rapid change	Low usage	Average variation
Disorderly	Disorderly transition	1,8 °C	Delayed	Rapid or slow change	Low usage	High variability
Hothouse World	Nationally Determined Contributions (NDCs)	~2,5 °C	NDCs	Slow change	Low usage	Low variation
Hothouse World	Current policies	+3 °C	None — current policies	Slow change	Low usage	Low variation

Source: NGFS (2025) and WEF (2023)



- ✓ **Orderly transition (Net Zero 2050):** a scenario characterized by the early and gradual implementation of strict climate policies, implying high transition risks and low physical risks. It allows for limiting global temperature rise to around 1,5 °C by 2100 and serves as a benchmark to guide best business practices for mitigation and adaptation
- ✓ **Disorderly transition:** assumes a delay in emissions reductions and a late and uneven implementation of climate policies across countries, leading to higher transition risks and limiting global temperature rise to around 1,8 °C by 2100.
- ✓ **Hothouse World:** assumes the continuation of current policies, with low transition risks and high physical risks, and a global temperature increase that could reach +3 °C by the end of the century.
- B. The assignment of external parameters associated with each risk, understood as variables driven by the scenarios that allow for the reflection of climate-related financial risk.
 - **Parameter:** the use of specialized sources such as the NGFS Scenario Explorer (IIASA) and the Climate Impact Explorer (Climate Analytics).
 - **Financial impact:** the bank's internal financial metric that will be affected by climate risk.

- C. The assessment of each risk using metrics that include:
 - Confidence level of the source and the parameter.
 - Scenario sensitivity.
 - Probability of parameter change.
 - Time horizon for the financial impact to materialize.
- D. Prioritization was performed by combining two methodologies in a “materiality vs. certainty” framework, where the metric assessments are grouped as follows:
 - **Materiality:** simple average of the “time horizon” metric averaged across each climate scenario, for a specific parameter/variable. If there are multiple parameters associated with the same risk, materiality will be the result of the simple average of the “time horizon” metrics averaged for each parameter.
 - **Certainty:** the simple average of the metrics “confidence level,” “probability,” and “sensitivity,” averaged across each climate scenario, for a specific parameter or variable. If there are multiple parameters associated with the same risk, the certainty will be the simple average of the metrics “confidence level,” “probability,” and “sensitivity” averaged for each parameter.

3. Quantifying the financial impact:

for prioritized risks and opportunities, since 2022 progress has been made in quantifying the financial impact through:

- A. The adoption of a stochastic, non-deterministic methodology developed by Ecoacciones SAS BIC.
- B. The identification of climate parameters associated with the cause or origin of each risk, considering both historical trends and future projections.

4. Risk management, control, and mitigation:

- A. Coordination with the responsible departments to identify risks associated with processes and define control and mitigation mechanisms.
- B. Implementing business continuity strategies in the face of climate crisis scenarios.
- C. Training employees on existing mechanisms for responding to and adapting to extreme events.

- D. Defining metrics for opportunities, implementation goals, monitoring, and traffic light alerts; identifying who is responsible for monitoring, the frequency of monitoring, whom to notify, the frequency of communication, and estimated costs related to implementing opportunities.
- E. Periodic evaluation and adjustment of the actions defined to reduce levels of exposure to operational risks.





Implementation of SARAS

Since 2023, at Banco de Occidente we have established the Environmental and Social Risk Management System (SARAS) as the structured framework for integrating sustainability into our lending operations. This system brings together policies, tools, and processes designed to identify, assess, mitigate, and monitor environmental and social risks in the projects and economic activities we finance.

In 2025, **we began the gradual integration of climate change criteria into SARAS**, strengthening risk management within the credit process. This evolution is being implemented in phases, **prioritizing sectors with greater climate exposure**, such as: civil engineering works and building construction, food production, and the supply of electricity, gas, steam, and air conditioning, as well as activities related to hydrocarbons, power generation, and mining, among others.

We are implementing a phased approach that allows us to conduct a more in-depth assessment of clients with higher risk levels, supporting them in defining action and mitigation plans. In this way, we ensure constant monitoring of their progress, in full alignment with our sustainable finance guidelines and the Bank's comprehensive risk management model.

Metrics and Objectives

At Banco de Occidente, we measure what we value to ensure compliance with our **climate goals**. Through a set of specific metrics and performance indicators, we analyze our portfolio's exposure to different climate scenarios, which allows us to accurately assess the progress of our roadmap launched in 2022.

Measurement Methodology and Scope

To ensure the integrity of our data, at Banco de Occidente we base the measurement of our footprint on the standards of the Greenhouse Gas Protocol (GHG Protocol). We adopt an operational control approach that includes the quantification of greenhouse gases (GHGs) such as CO₂, CH₄, N₂O, SF₆, HFCs, and HCFCs.

In 2022, we took a crucial step by revising our methodology in accordance with the **Science Based Targets** initiative (SBTi) guidelines. This has enabled us to project emissions trajectories across all three scopes:

- ✓ **Scopes 1 and 2:** Direct and indirect emissions from energy consumption.
- ✓ **Scope 3:** We include an analysis of financed emissions, assessing our portfolio's exposure to various climate scenarios.



Operational GHG Emission Mitigation Projects

Our actions to reduce our GHG footprint focus on efficiency and responsibility:

- ✓ **Energy efficiency:** We implement sustainable construction and renovation projects in our offices.
- ✓ **Resource management:** We optimize paper and water consumption, in addition to ensuring proper waste disposal and reduction.
- ✓ **Action timeline:** The reduction activities approved in 2023 began formal implementation in 2024.



Emissions Management Objectives

Our climate management is guided by the **Emissions Management Plan (EMP)**, the instrument through which we operationalize our commitment to the National Carbon Neutrality Strategy. Thanks to the implementation of these reduction measures, **ICONTEC** has awarded us the **Carbon Neutral Certificate**, recognizing our institutional capacity to manage environmental impact indicators. Under this framework of excellence, we have defined the following objectives across three time horizons to ensure our future sustainability.

Short term (1 year)

- Develop a roadmap to **reduce electricity consumption by 2,5%** each year starting from the base year 2022, as well as a **0,5%** reduction in the direct **emissions indicator** from fuel consumption.
- Develop a roadmap to reduce refrigerant gas leakage emissions by **15% by 2025**, starting from the base year 2022.
- Conduct an annual measurement and analysis of **emission indicators**, considering the results obtained during the evaluation period.
- Implement **all the actions set forth** in this report.
- Define **corrective actions** based on the annual assessment of monitoring indicators.

Medium term (3 years)

- Conduct an **analysis of** short-term **emissions trends** by reviewing the trends of the emissions indicators included in the carbon-neutral plan, with the aim of adjusting the plan if necessary.
- Evaluate the **inclusion of new actions** with high reduction potential, in accordance with the objectives achieved in the **2024—2025** period.
- Define **corrective actions**, in accordance with the annual evaluation of monitoring indicators and the annual decarbonization protocol.
- **Align the objectives and targets** of this plan with the provisions of the Decarbonization Protocol.

Long term
(more than
4 years)

- Reduce direct emissions in our Scopes 1, 2, and 3 by **42% by 2030**, which equates to a **5,25%** overall reduction and a **1,75% annual** reduction **for each scope**.
- Conduct an **analysis of emissions trends** in the **medium** term by reviewing the trends of the emission indicators contained in the carbon-neutral plan, with the aim of adjusting the plan if necessary.
- Evaluate the **inclusion of new actions** with high reduction potential, in accordance with the objectives achieved during the **2024—2027** period.
- Define **corrective actions** based on the annual evaluation of monitoring indicators.
- Meet the objectives and targets of this plan as established by the **Decarbonization Protocol**.



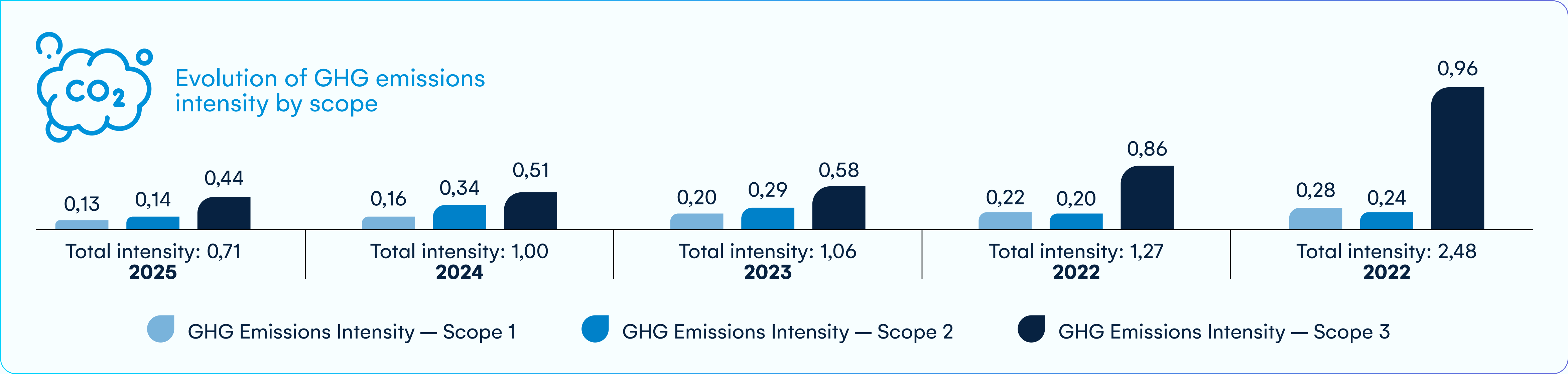
Measuring Our GHG Emissions

Measuring and tracking greenhouse gas (GHG) emissions intensity is a key element in evaluating Banco de Occidente’s environmental performance and its progress toward carbon- r carbon- –neutrality. Through the analysis of **Scopes 1, 2, and 3**, the Bank monitors the evolution of its emissions in relation to its operations and makes decisions aimed at progressively reducing its carbon footprint.

GHG Emissions and Intensity by Scope

Concept	Unit	2025	2024	2023	2022	2021
Scope 1 GHG emissions (A1)	tCO2e	886,86	1.104,2	1.379,49	1.540,20	2.010,22
Scope 2 GHG emissions (A2)	tCO2e	1.002,48	2.386,03	1.992,65	1.396,26	1.694,59
Scope 3 GHG emissions (A3)	tCO2e	3.114,11	3.547,63	4.023,15	6.103,38	14.003,62
Contributors	Number	7.054	7.020	6.984	7.113	7.151
GHG emissions intensity (A1)	tCO2e / employee	0,13	0,16	0,20	0,22	0,28
GHG emissions intensity (A2)	tCO2e / employee	0,14	0,34	0,29	0,20	0,24
GHG emissions intensity (A3)	tCO2e per employee	0,44	0,51	0,58	0,86	1,96
Total GHG emissions	tCO2e	5.003,45	7.038,2	7.395,3	9.039,84	17.708,43
Total GHG emissions intensity	tCO2e / employee	1.03	1.00	1.07	1.28	2.48

Nota: The greenhouse gas (GHG) emissions intensity indicator is calculated as the ratio of total emissions expressed in tons of carbon dioxide equivalent (tCO2e) to the total number of employees in the organization.



Intensity and trends by scope

Between 2021 and 2025, Banco de Occidente shows a sustained reduction in **total GHG emissions intensity, falling from 2,48 to 1,03 tCO₂e per employee**, reflecting a structural improvement in the environmental efficiency of operations, even amid external fluctuations in the national energy system.

These results confirm that the Bank’s emissions management strategy focuses not only on absolute reduction but also on progressively decoupling operational growth from carbon intensity.

As part of our eco-efficiency goals, we committed to reducing direct emissions across our Scopes 1, 2, and 3 by 42% by 2030, which equates to an overall decrease of 5,25% and an annual reduction of 1,75% for each scope.

Concept	2023 vs 2022	2024 vs 2023	2025 vs 2024
Scope 1	- 10%	- 20%	-19,7%
Scope 2	+ 43%	+ 20%	-58%
Range 3	- 34%	- 12%	12%
Total	- 18%	- 5%	28,92%

Note: The emission reduction percentages presented in this table correspond to the year-over-year change, calculated relative to the end of the immediately preceding period.

- ✓ In 2025, we achieved a **reduction in Scope 1 emissions**, primarily due to lower fuel consumption associated with mobile sources and reduced releases of refrigerant gases from air conditioning systems. This result was reinforced by ongoing **preventive maintenance**, which helps reduce fugitive emissions and improve the operational efficiency of this equipment.

✓ Regarding **Scope 2 emissions**, a significant reduction was recorded as a result of the decrease in electricity consumption, along with the change in **the emission factor of the National Interconnected System**, published by XM, which showed a 55,76% reduction compared to 2024. This combination
- made it possible to reduce emissions associated with energy consumption by approximately **58%**, positively impacting the Bank’s environmental performance.

✓ Regarding **Scope 3 emissions**, a significant reduction was observed in 2025, primarily associated with the decrease in paper consumption, lower waste generation, and the optimization of outsourced transportation. Although employee commuting to and from the Bank showed a slight increase, this trend aligns with the implementation of the hybrid work model and the strengthening of **the Sustainable Mobility Program**, aimed at promoting more responsible travel alternatives.



✓ We achieved a **28,9% reduction in our total emissions** compared to 2024 and a **44% reduction** compared to our 2022 baseline. These results are a direct reflection of the initiatives we implemented during 2024 and 2025, reaffirming our determined progress toward **meeting our decarbonization goals**. We acted in full alignment with our **Emissions Management Plan and the Operational Eco-efficiency Plan**, aligning every action with the commitments of the 2030 Agenda to contribute to a more sustainable future.

Taken together, the trends in emissions intensity and the reduction in annual emissions demonstrate consistent progress in the implementation of the Bank's **Emissions Management Plan**. These results strengthen the organization's capacity to manage operational and transition climate risks and serve as a key input for strategic decision-making within the framework of our long-term commitment to carbon neutrality.

Financed Emissions

At Banco de Occidente, we are making steady progress in **measuring and managing the emissions** associated with the loans we finance, recognizing their importance in understanding the carbon footprint of our **loan portfolio** and strengthening decision-making regarding climate management. **In 2025, we conducted an exercise to measure financed emissions** using data from the commercial and retail banking portfolios, as of December 2024, with the aim of obtaining a comprehensive view of the portfolio's emissions profile, improving the quality of available data, and establishing a robust technical foundation for managing risks and opportunities

associated with climate change.

This exercise was conducted in alignment with the Partnership for Carbon Accounting Financials (PCAF) standard, ensuring comparability, methodological traceability, and consistency with international best practices.

Financed Emissions by Economic Sector

The measurement of financed emissions was structured based on all economic sectors present in the Bank's portfolio, considering Scope 1, 2, and 3 emissions attributable to the financing provided. **The portfolio measurement for 2024 regarding total financed emissions amounts to 2.245.196 tCO₂e, with the Corporate Banking and Retail Banking portfolios accounting for 98,38% of the portfolio under analysis.**

The sectors with the highest contribution to financed emissions are:

- ✓ **The industrial sector, with 399.582,66 tCO₂e**, associated with production processes intensive in energy and raw material use.
- ✓ **The cement sector, with 49.366,28 tCO₂e**, associated with energy-intensive industrial processes and process emissions.
- ✓ **The steel sector, with 13.561,53 tCO₂e**, linked to energy- and material-intensive production processes.

✓ **Chemical sector, with 87.069,07 tCO₂e**, characterized by production processes intensive in energy and raw materials, and high exposure to transition risks.

✓ **AFOLU (Agriculture, Forestry, and Other Land Use), with 395.368,44 tCO₂e**, a sector significant both for its contribution to emissions and for its high exposure to physical risks associated with climate change.

✓ **Other sectors, with 386.195,68 tCO₂e**, which include activities such as mining, personal services, business services, **healthcare, public services, commerce, the public sector, telecommunications, transportation and logistics, hospitality, and tourism**, reflecting a diversified contribution from operation- and service-intensive sectors.

✓ **The energy sector, with 284.993,34 tCO₂e**, linked to energy generation and service provision activities.

✓ **Oil & Gas, with 164.353,59 tCO₂e**, reflecting the high carbon intensity associated with these types of activities.

✓ **Infrastructure and construction, with 162.560,28 tCO₂e**, a key sector for economic development and the transition toward more sustainable construction models.

✓ **Financial sector, with 9.022,14 tCO₂e**, associated primarily with financial operations and services, with a relatively minor contribution but relevant for a comprehensive analysis of the portfolio.

✓ **The education sector, with 4.491,43 tCO₂e**, accounts for a small share of total financed emissions but contributes to a comprehensive understanding of the portfolio's sectoral profile.





The remaining sectors** have smaller relative shares but are equally relevant for comprehensively understanding the portfolio's emissions profile. In these cases, the data quality level achieved a **score of 5 according to the PCAF methodology**, providing us with an adequate basis of reliability for the aggregate analysis. At the same time, this result allows us to identify **opportunities for improvement** to continue strengthening the quality of the information, deepen our understanding of our clients' operations and activities, and move toward **increasingly accurate and representative estimates** of our financed emissions.



Issuances
financed by sector
(percentage)

Note:** The "Other" category includes the following sectors: Mining, Retail, Hospitality and Tourism, Healthcare, Public Sector, Utilities, Telecommunications, Personal Services, Business Services, Transportation, and Logistics.

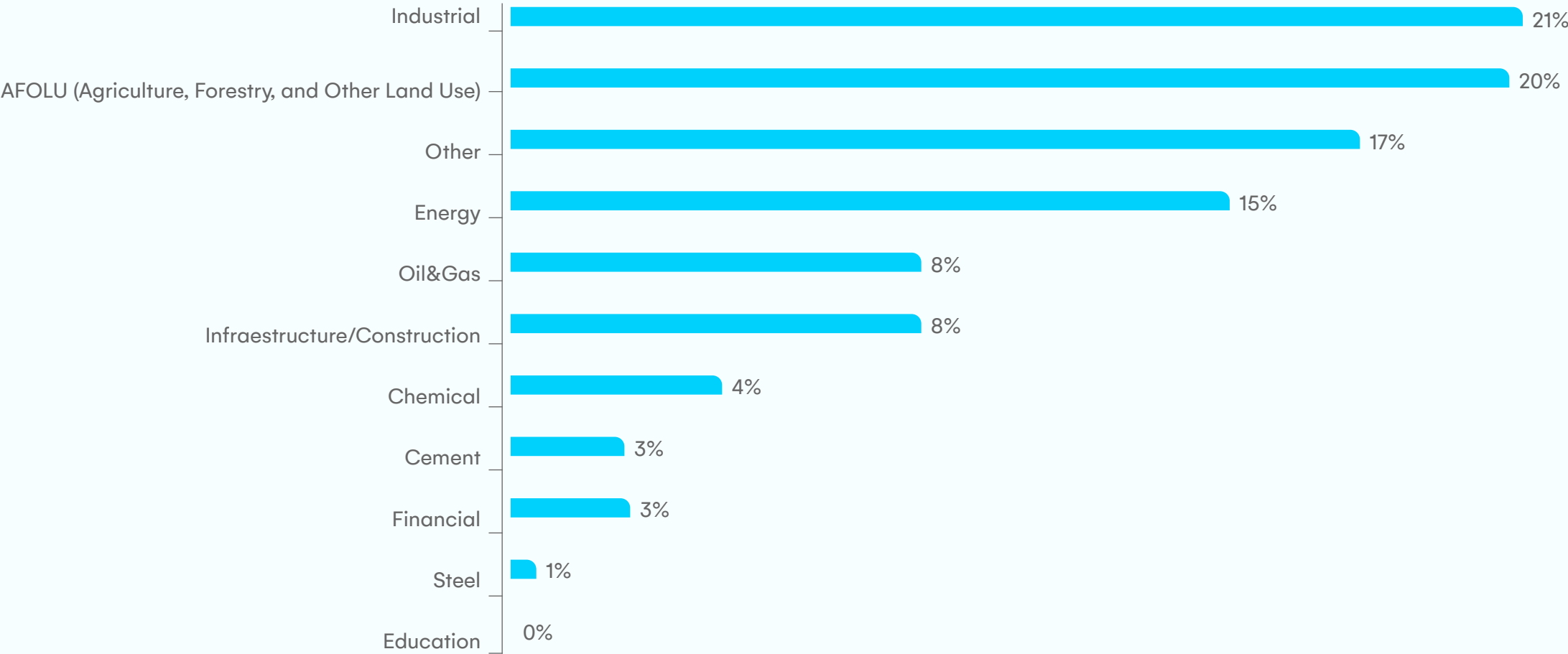


Data by sector of
the commercial
portfolio

*Figures in tons of CO2equivalent (tCO2e).

*Economic figures in MCO

Note** The total emissions figure in the table above shows a slight variation from the initially reported value due to adjustments resulting from rounding and decimal cleansing during the calculation. However, this difference does not alter the representativeness of the result, so the consolidated and technically valid value of emissions is: 1.956.569,39 tCO2e.



Sector	Balance	Scope 1 + 2	Scope 3	Total
Agribusiness	\$ 1.512.253.426.767,09	216.702,76	178.665,68	395.368,44
Construction	\$ 3.884.635.208.722,82	25.354,61	137.205,67	162.560,28
Financial	\$ 4.385.572.610.500,48	2.432,42	6.589,72	9.022,14
Power Generation	\$ 1.724.926.845.011,45	228.341,99	56.651,35	284.993,34
Manufacturing	\$ 3.460.835.337.967,30	79.655,63	319.927,03	399.582,66
Oil & gas	\$ 1.082.340.433.704,97	101.599,09	62.754,50	164.353,59
Steel	\$ 176.787.370.666,83	3.691,49	9.870,04	13.561,53
Cement	\$ 197.813.602.166,33	28.157,94	21.208,34	49.366,28
Chemicals	\$ 339.812.316.354,18	48.959,26	38.109,81	87.069,07
Education	\$ 247.207.795.885,45	2.686,41	1.805,03	4.491,44
Other**	\$ 9.640.229.076.099,99	173.795,73	212.399,95	386.195,68
Total	\$ 26.652.414.023.846,90	911.377,33	1.045.187,12	1.956.564,45*

Retail and Corporate Banking Portfolio

Retail Banking			Corporate Banking		
Type	Total Emissions	Amount	Type	Total Issuances	Amount
Vehicles	286.291,00	\$ 2.337.301,17	Commercial Loans	1.621.535,39	\$ 20.130.565,08
Mortgages	2.335,34	\$ 1.898.313,16	Project Finance	335,034	\$ 6.521.848,95
Total	288.626,34	\$ 4.235.614,33	Total	1.956.569,39	\$ 26.652.414,03

*Figures in tons of CO2equivalent (tCO2e).
*Economic figures in MCOP.

Portfolio data

Type	Amount	Coverage	Total CO ₂	Scope 1 + 2	Scope 3
Portfolio: banking, individuals, vehicles	\$ 2.337.301,17	7,57%	286.291,00	286.291,00	0
Existing mortgage portfolio	\$ 1.898.313,16	6,15%	2.335,34	2.335,34	0
Corporate banking portfolio, project finance	\$ 6.521.848,95	21,11%	335.034,00	149.406,20	185.627,74
Existing portfolio: corporate banking and commercial loans	\$ 20.130.565,08	65,17%	1.621.535,39	761.975,26	859.560,13
Total portfolio processed	\$ 30.888.028,36	98,38%	2.245.195,73	1.200.007,80	1.045.187,87
Total portfolio	\$ 31.396.611,26	100,00%			

*Figures in tons of CO2equivalent (tCO2e).
*Financial figures in MCOP.

Consolidated results of financed emissions

In aggregate, the main indicators of financed emissions for 2025 are as follows:

- ✓ **Total absolute financed emissions:** 2.245.195,73 tCO2e
- ✓ **Absolute financed emissions — Corporate Banking:** 1.956.569,39 tCO2e
- ✓ **Absolute financed emissions — Retail Banking:** 288.626,34 tCO2e
- ✓ **Total amount financed linked to customer emissions:** 30.888.028 BCOP.
- ✓ **Intensity metric:** 0,07269 tCO2e / MCOP
- ✓ **Scope of assessment:** 98,38%
- ✓ **Retail Banking:** Mortgages and Auto Loans.
- ✓ **Corporate Banking:** Project Finance and Commercial Loans.

These results constitute a relevant baseline for monitoring the portfolio’s evolution and for designing mitigation strategies, supporting clients, and developing financial solutions aligned with the climate transition.





Goals, challenges, and opportunities in financed emissions

The management of financed issuances is a strategic pillar in the evolution of our ESG strategy and in the transition toward a portfolio aligned with a low-carbon economy. In this context, during **2025 we made progress in strengthening technical and information capabilities**, laying the groundwork for defining future decarbonization goals.



Goals



2025 Goal (short term):

Measure financed emissions corresponding to the 2024 portfolio, expanding the scope and coverage of the exercise.

Result: Goal achieved. The measurement was carried out with the support of a specialized consultant, achieving **98,38% coverage of the portfolio** and incorporating assets from Corporate Banking and Retail Banking under the PCAF methodology.

2026 Goal (short- to medium-term):

Refine the calculation of financed emissions with a **higher level of granularity**, particularly in material categories and relevant sectors, thereby strengthening the quality, consistency, and traceability of the information.

2026—2027 Goal (medium term):

Define and establish portfolio decarbonization goals and targets based on a robust and reliable baseline, aligned with the Bank's strategy, risk management, and international best practices in sustainable finance.

Challenges



Consolidate a solid and validated baseline that allows for the definition of realistic, measurable, and comparable commitments over time, within a context of high methodological complexity and variable availability of information.

Progressively integrate the management of financed emissions into business decision-making, ensuring consistency with the Bank's business strategy, risk appetite, and climate management.

Opportunities



Transform climate impact analysis into a competitive advantage, strengthening risk management, transparency, and the Bank's positioning in the financial market.

Support clients in their transition by offering more sustainable financing alternatives and promoting practices that reduce their environmental impact and strengthen their resilience to climate change.



Methodology for Calculating Financed Emissions

The measurement of financed emissions was based on detailed information from Retail Banking and Commercial Banking, applying a structured process of data preparation, cleansing, and validation in accordance with the PCAF standard.

Information sources and exclusion criteria

In Retail Banking, products such as credit cards, unsecured personal loans, and payroll loans were excluded due to the inability to identify the specific use of the funds. Likewise, auto loans were excluded when there was insufficient technical information to determine the vehicle type and assign appropriate emission factors.

In Commercial Banking, corporate commercial loans and project financing were distinguished. In both cases, leasing transactions—classified as leased assets under PCAF—were excluded, as were loans with undefined ISIC codes, personal loans identified within the commercial portfolio, and financing to local governments, for which the standard does not provide an applicable methodology.

Calculation Methodology by Product Type

✓ **Mortgages:** Each transaction was treated as a housing unit classified as VIP, VIS, or non-VIS housing, depending on the property’s value. Average areas by housing type were used, assuming

single-family homes. In the absence of complete information, a 100% attribution factor was applied.

- ✓ **Vehicle loans:** Loans were classified by subcategory to distinguish between passenger vehicles and light trucks. Average annual mileage based on public sources was used, and the attribution factor was calculated as the ratio of the financed amount to the vehicle’s value, assuming 100% when complete information was unavailable.
- ✓ **Commercial loans and project financing:** The ISIC classification was used to identify each client’s economic activity and its correspondence with the Exiobase sectors. Based on this relationship, the sectoral emission factors defined by PCAF were assigned.

Methodological adjustments

Since the emission factors used correspond to the base year 2019, currency conversions were performed using the average exchange rate from euros to Colombian pesos, and an inflation adjustment was applied based on values published by the World Bank, thereby ensuring the consistency and comparability of the results.





Action Plan for Climate Change Management

At Banco de Occidente, we recognize that climate change management requires a comprehensive, progressive, and cross-cutting approach that integrates strategic decision-making, risk management, business operations, and performance measurement. In this regard, the **Climate Action Plan** consolidates the main lines of work that guide the implementation of the TCFD framework at the Bank, strengthening our capacity for anticipation, response, and resilience in the face of the risks and opportunities associated with climate change.

This plan is structured around the four pillars of the TCFD—**Governance, Strategy, Risk Management, and Metrics and Targets**—and defines concrete actions to advance in an orderly and consistent manner in each of them.

1. Climate Governance

At Banco de Occidente, **climate governance is a pillar subject to continuous improvement** to ensure its relevance and operational effectiveness. To strengthen our capacity to respond, we are currently in a **phase of strategically** updating our structure, drawing on specialized advisory services to strengthen decision-making mechanisms and consolidate a leading, effective, and resilient governance model.

Priority lines of action:

Oversight and responsibilities in climate risk management	→ Clear definition of responsibilities for climate risk management within the corporate governance model. → Integration of climate management into the Bank’s risk identification, assessment, and mitigation processes. → Periodic review of roles and functions to ensure their effectiveness and alignment with international standards. → Cross-functional coordination among key areas (Sustainability, Risk, Human Resources, Administration, and Commercial).
Capacity building	→ Training programs tailored to different organizational levels, aimed at integrating climate risk into decision-making. → Specialized workshops for key teams and areas, focused on climate risks, scenarios, and best management practices. → Internal forums to disseminate policies, frameworks, and lessons learned regarding climate issues. → Specific programs for senior management, aimed at strengthening strategic oversight of climate risks.
Alignment of incentives	→ Progressive evaluation of mechanisms to integrate climate criteria into the Bank’s incentive and compensation schemes. → Analysis of metrics, time horizons, and indicators to track climate performance. → A phased approach aimed at aligning the climate strategy with value creation and responsible risk management. → Throughout 2025, we will continue to prioritize defining the characteristics and criteria of our short- and long-term incentives, ensuring they are fully aligned with market best practices.

2. Strategy

At Banco de Occidente, we are making steady progress in incorporating climate change as a fundamental pillar of our corporate strategy. We recognize that climate risks and opportunities are critical to the sustainability of our business, decision-making, and value creation in the short, medium, and long term. In this context, our climate strategy is aimed at strengthening the resilience of the organization, our portfolio, and our operations, aligning us with the recommendations of the TCFD framework and international best practices.

Priority action areas:

Integration of climate risk into the Bank's strategy	→ Regularly updating the mapping of climate risks and opportunities, considering economic sectors, geographic location, and portfolio exposure. → Strengthening internal processes to integrate climate analysis into the Bank's strategic risk management. → Progressive alignment with international frameworks and guidelines to ensure methodological consistency and comparability.
Assessment of financial impacts and strategic resilience	→ Progressive development of climate risk capabilities for the Sustainability Management and Credit Risk Management teams. → Strengthen impact assessments across different time horizons (short, medium, and long term). → Segmentation of the analysis by economic sector and geography, based on climate exposure.
Assessment of financial impacts and strategic resilience	→ Consolidate ownership of the climate strategy across the Bank's various departments. → Evaluate and incorporate initiatives that respond to new market trends and best practices. → Dynamically adjust the Climate Strategy in response to regulatory, market, and climate context changes.





3. Risk Management

The Bank continues to make progress in the gradual incorporation of climate risk into its Integrated Risk Management System, recognizing its cross-cutting nature and potential financial impact. This process is currently in a strengthening phase, with a gradual approach aimed at enhancing methodologies, internal capabilities, and monitoring mechanisms, in line with the TCFD’s recommendations.

Priority action lines:

Integration of climate risk into the comprehensive risk management system

- We continue to assess the relevance of classifying climate risk as a strategic risk at the corporate level.
- Analysis of the relationship between climate risk and the Bank’s risk appetite and operational limits.
- Progressive integration of climate risks into the existing frameworks of the risk management system.

Methodologies and tools for identification and assessment

- We continue to develop the annex to the general risk model that specifies criteria, methodologies, and guidelines for the assessment of climate risks.
- Strengthening of processes for identifying and prioritizing physical and transition risks.
- Support from specialized consultants to strengthen comprehensive climate change management and ensure alignment with international best practices.
- Progressive integration of climate risks into the Environmental and Social Risk Management System (SARAS).

Monitoring, metrics, and continuous strengthening

- Design and implementation of metrics and key performance indicators (KPIs) for monitoring prioritized climate risks.
- Development of a strategic plan to enable gradual progress in the mitigation and management of identified risks.
- Strengthening of internal oversight and reporting processes to support informed decision-making.

4. Metrics and objectives

We base our climate change management on a robust set of metrics and targets that allow us to monitor performance, guide decision-making, and evaluate progress toward our **decarbonization and eco-efficiency commitments**. We review these metrics periodically and adjust them as the regulatory, operational, and market contexts evolve, always ensuring alignment with TCFD recommendations.

Between **2022 and 2025**, Banco de Occidente has made consistent progress toward meeting its environmental goals, achieving the following results:

✓ **Energy:** a cumulative reduction of **15,64%**, resulting from initiatives focused on energy efficiency and the responsible use of resources.

✓ **Water:** improved data quality and expanded coverage, which allowed us to restructure the baseline defined in 2024 and establish a more solid foundation for monitoring this indicator.

✓ **Waste:** a **17,39%** decrease, associated with actions to reduce waste generation and improve management and recycling processes.

✓ **Emissions:** cumulative reduction of **44%**, reflecting the impact of actions implemented in the areas of eco-efficiency and emissions management.

✓ **Paper:** **36,49%** reduction, driven by process optimization, digitization, and the responsible use of materials.





General Measurement Approach

We measure and manage our greenhouse gas (GHG) emissions using an operational control approach, integrating Scopes 1 and 2—corresponding to direct and indirect emissions from energy consumption—as well as making steady progress in measuring and managing the impacts associated with our portfolio. This approach allows us to prioritize actions targeting the main sources of emissions and strengthen the traceability of our results in the short, medium, and long term.

Actions for the decarbonization of operations

Scope 1 — Direct emissions: our direct emissions stem primarily **from fuel consumption and refrigerant leaks** in our operations. To manage these, we have defined action plans focused on operational efficiency and the progressive reduction of emissions:

- ✓ Systematic monitoring of fuel consumption by fixed and mobile sources, identifying critical areas and opportunities for reduction.
- ✓ Technical evaluation for the incorporation of voluntary biofuel blends and lower-carbon alternatives.
- ✓ Feasibility analysis for the gradual conversion of the vehicle fleet to electric or lower-environmental-impact options.
- ✓ Strengthening of environmental criteria in the selection of vehicle leasing and operation providers.

- ✓ Preventive maintenance programs for refrigeration equipment, accompanied by the gradual replacement of conventional refrigerants with alternatives with lower global warming potential.

Scope 2 — Indirect emissions from energy consumption: Given that energy consumption represents one of the most significant sources in the emissions inventory, the Bank has prioritized actions aimed at **energy efficiency** and the **transition to renewable sources**:

- ✓ Energy assessment of operational facilities, considering their technical conditions and usage patterns.
- ✓ Identification of opportunities for energy savings and consumption optimization through operational and technological improvements.
- ✓ Continuation of the process of converting lighting systems to LED technology in offices and common areas.
- ✓ Assessment of the technical and financial feasibility of incorporating solar power generation solutions at selected facilities.

Long-term climate goals

The Bank's climate strategy is structured around clear and measurable objectives, aligned with national and international decarbonization commitments:

- ✓ Minimum annual reduction of 4,7% in Scope 1 and 2 GHG emissions.
- ✓ A cumulative 42% reduction in Scope 1 and 2 GHG emissions by 2030.

- ✓ Achieve carbon neutrality by 2050, as part of the Bank's long-term commitment.

Operational eco-efficiency targets for 2030

To complement our emissions reduction targets, we have defined eco-efficiency goals that strengthen our responsible management of resources:

- ✓ Reduce **energy** consumption at facilities by **20%**.
- ✓ Reduce **water** consumption by **10%**.
- ✓ Reduce **waste** generation by **25%**.
- ✓ Reduce **paper** consumption by **25%**.

Alignment with portfolio management

In addition, we are making progress in **mitigating climate risks associated with our portfolio** by developing sustainable financing opportunities. Through our credit lines, we support our clients in their **transition toward more resilient, low-carbon business models**. We reinforce this approach with continuous analysis of sectoral and geographic exposure, strengthening decision-making and comprehensive climate risk management.





Glossary

Presentation

Introduction:
Our Bank and Its
Commitment

Responsible Growth
and Comprehensive
Risk Management

Sustainability:
Creating
Shared Value

Strong Governance
and Ethical
Leadership

Action
for the Planet

Empowering
People and
Communities

Acknowledgments



Appendices



Financial Statements

Consolidated



Separate





bancooccidente.com.co



**Banco de
Occidente**

