ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

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ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

1. INTRODUCTION

Mercantil Colpatria S.A., and its subsidiaries, in their capacity as Obligated Entities (hereinafter "Obligated Entities"), are convinced that acting with integrity is essential to generating sustainable value and building lasting relationships of trust. In alignment with their organizational culture and corporate values, they have adopted a Business Transparency and Ethics Program ("PTEE" for its acronym in Spanish), which establishes the Anti-Corruption and Anti-Bribery Policy. Through this policy, the companies reaffirm their commitment to compliance, transparency, and the responsible development of their activities, aligned with the highest ethical standards, for the benefit of all their counterparties and the setting in which they operate.

2. OBJECTIVES

The Board of Directors of Mercantil Colpatria S.A., as the holding company of Grupo Empresarial Colpatria, and the Highest Governing Body of each Obligated Entity, fully embrace their responsibility to inspire and promote, together with their subsidiaries that are Obligated Entities and all related counterparties, an ethical conduct based on the highest standards of integrity. Through this Anti-Corruption and Anti-Bribery Policy, they reaffirm their unwavering commitment to zero tolerance toward any form of Corruption or Transnational Bribery.

This commitment reflects not only strict compliance with the law, but also a firm decision to always act with honesty, transparency, and respect for their corporate values. The Obligated Entities believe that doing what is right is the foundation for building a sustainable, reliable, and fair environment for everyone.

With the implementation of this Policy, the Obligated Entities seek to achieve the following objectives:

1. Strengthen their corporate culture based on ethics, promoting coherence between words and actions as a genuine reflection of their values and principles.

2. Protect their image and reputation by preventing any form of Corruption or Transnational Bribery through the adoption of clear, firm, and preventive measures that express their zero-tolerance stance toward such conduct.

3. Define clear guidelines for addressing risks of Corruption and Transnational Bribery, allowing them to be identified, measured, managed, and corrected in a timely manner, within a framework of continuous improvement and commitment to compliance. All of this with the aim of preserving the trust of its counterparties and contributing to an ethical and sustainable business environment.

These guidelines are designed to serve as a reference for the actions of all counterparties that maintain business relationships with the Obligated Entities, in accordance with the standards adopted by them for the prevention and control of Corruption and Transnational Bribery risks.

The strategy of the Obligated Entities for the struggle against Corruption and Transnational Bribery includes, among other components and related systems, the Business Transparency and Ethics Program

(PTEE) and the Self-Control and Comprehensive Risk Management System for ML/TF/FPADM ("SAGRILAFT" for its acronym in Spanish).

3. SCOPE

This Policy applies to the Obligated Entities and all counterparties with whom any commercial, contractual, or business relationship is established, either directly or indirectly. The primary objective of the PTEE is to minimize the possibility of materializing situations associated with the risk of Corruption and Transnational Bribery in national and international business and transactions that could lead to deception, breach of trust, and, in general, damage to its reputation, assets, and stakeholders.

In accordance with this Policy, the Obligated Entities and their counterparties shall refrain from participating in any corrupt practices or forms of bribery, whether directly or indirectly.

4. PRINCIPLES

The Obligated Entities believe that acting with integrity is both a shared responsibility and a commitment to the present and the future. These principles guide the implementation of this Policy and reflect their determination to build an ethical and sustainable culture in all their relationships:

Principle 1 – Proportionality. Actions must be as robust as they are relevant. Therefore, measures to prevent the risks of corruption and bribery have been designed proportionally, taking into account the size, nature, economic activities, and particular characteristics of the business.

Principle 2 – Shared Commitment. The Obligated Entities understand that building an ethical and transparent environment requires the active commitment of everyone involved. Therefore, they require their counterparties to become familiar with, respect, and apply the guidelines set forth in the Business Transparency and Ethics Program (PTEE) Manual and to always act in accordance with them.

Principle 3 – Risk-Based Management. Aware of the challenges faced in the business environment, the Obligated Entities adopt a preventive approach to identify, assess, monitor, and implement controls that enable them to mitigate the risks of Corruption and Transnational Bribery rigorously and in a timely manner, strengthening their processes and decisions through effective risk management.

Principle 4 – Due Diligence. Every relationship matters. That is why all interactions with counterparties are governed by the principles of the PTEE, including a systematic third-party due diligence process that guarantees transparency, trust, and continuous updating.

Principle 5 – Communication and Training. Knowledge is essential for making ethical decisions. The Obligated Entities undertake to provide the necessary resources for their employees to fully understand the risks associated with corruption and bribery, through clear and accessible communication channels and periodic training programs. These actions not only ensure compliance with regulations, but also foster a personal commitment to ethics in every decision.

Principle 6 – Monitoring and Continuous Improvement. Ethics is managed in a daily basis. The Obligated Entities establish clear responsibilities to monitor and periodically review their Program, ensuring its

correct implementation, effectiveness, and constant adaptation to new realities, lessons learned, and challenges.

5. DEFINITIONS

Below are the most frequently used terms or abbreviations in this Anti-Corruption and Anti-Bribery Policy, along with their definitions or meanings, for your information, understanding, and application:

- **Counterparties:** Individuals or legal entities with whom there are business, contractual, or legal relationships of any kind. Among others, counterparties include employees, shareholders, members of corporate governance bodies, business partners, suppliers, and allies.

- **Corruption**: Any conduct aimed at benefiting a company, or seeking a benefit or interest, or using it as a means to commit crimes against public administration or public assets, or to commit acts of Transnational Bribery.

  Acts of corruption are understood as the criminal conducts listed in the chapters on crimes against public administration, the environment, the economic and social order, financing of terrorism and organized crime groups, administration of resources related to terrorist activities and organized crime in the Colombian Criminal Code, those established in Laws 1474 of 2011 and 2195 of 2022, electoral crimes, or any other punishable conduct related to public assets that may have been committed.

- **Integrity Channel:** A secure, confidential, independent, and accessible reporting and consultation mechanism, administered by an independent third party, through which any person may raise questions regarding ethical dilemmas, seek guidance, or report irregularities, suspected misconduct, or potential violations of applicable law, corporate policies, or this Code. Reports and inquiries may be submitted on an identified or anonymous basis and will be handled in accordance with the principles of confidentiality, objectivity, and protection against retaliation. The Integrity Channel is a fundamental tool for promoting a culture of transparency, compliance, and integrity within Grupo Empresarial Colpatria.

- **Transnational Bribery**: According to Article 19 of Law 2195 of 2022, this crime is committed by legal entities that, through one or more of their own or any subordinate legal entity's employees, contractors, administrators, or associates, give, offer, or promise to a foreign public official, directly or indirectly: (i) sums of money, (ii) any object of pecuniary value, or (iii) any other benefit or advantage, in exchange for the foreign public official performing, omitting, or delaying any act related to the exercise of their functions and in connection with an international business or transaction.

- **Bribery**: According to the Anti-Bribery and Anti-Corruption Policy, bribery is the act of offering, promising, or giving anything of value in cash or in kind (favors, gifts, products, and services) in order to obtain or achieve an inappropriate benefit or advantage for oneself or a third party.

6. GENERAL GUIDELINES

The Obligated Entities are convinced that building relationships based on ethics, legality, and transparency is essential to achieving sustainable impact. Therefore, they share these guidelines with their counterparties, which reflect their commitment to the prevention of Corruption and Transnational Bribery, and which must be observed in all commercial, contractual, or business relationships:

The Obligated Entities:

1. Categorically reject any act of Corruption or Transnational Bribery, regardless of its form or type. This principle is non-negotiable in all their operations.

2. Strictly prohibit any act of bribery, without exception. This includes improper payments, benefits, or offers to public or private officials, whether domestic or foreign, either directly or through third parties or intermediaries. This prohibition is absolute and reflects their commitment to legality, integrity, and transparency in all their relationships.

3. Conduct their operations with the highest ethical standards and in strict compliance with applicable laws, and therefore expect their counterparties to join them in this commitment.

4. Promote an anti-corruption and anti-bribery culture that permeates all levels: administrators, managers, directors, employees, suppliers, allies, and other related third parties.

5. Recognize that responsible growth requires acting with coherence and transparency. Therefore, they have established clear rules to prevent conflicts of interest and practices that could jeopardize their reputation, including regulations on gifts, presents, invitations, and hospitality. These provisions, which are included in the PTEE Manual, reflect their commitment to an ethical culture, the trust of their allies, and long-term sustainability.

6. Delegate to their leaders the responsibility of ensuring that all employees know and understand the rules, procedures, and controls established to prevent and manage the risk of Corruption and Transnational Bribery.

7. Have internal policies, procedures, and rules governing local and international contracts, operations, and transactions that must be complied with by all parties involved.

8. Have guidelines and methodologies for identifying, measuring, and monitoring the risks of Corruption and Transnational Bribery, and expect their counterparties to implement similar actions in their processes.

9. Periodically review and update the risks and controls set out in their PTEE, with the purpose of ensuring its effectiveness in the face of changing environments, new threats, and regulatory requirements. This ongoing review process strengthens prevention, detection, and response capabilities and acts as a key tool for protecting their operations, reputation, and sustainability against possible acts of Corruption or Transnational Bribery.

10. Promote awareness among their counterparties of best practices for preventing and managing the risks of Corruption and Transnational Bribery. To this end, they have resources, strategies, and training programs that strengthen the culture of compliance both internally and within their business environment.

11. Establish strict requirements for engaging counterparties and refuse to enter into or renew any contractual, commercial, or business relationship that does not comply with the requirements of the law and internal regulations.

12. Establish relationships with counterparties through clear and transparent processes that allow for the evaluation of their suitability, in compliance with internal procedures. Any third party that has contact or negotiations with public officials must be aware of and comply with this policy.

13. Will not maintain ties with counterparties that have been convicted of criminal activities related to Corruption or Transnational Bribery.

14. Do not carry out, directly or indirectly, transactions, operations, or business involving virtual assets, cryptocurrencies, or any other digital instrument that lacks legal backing, express regulation, and supervision by the competent authorities in Colombia.

15. Do not tolerate their counterparties obtaining commercial, financial, or other results in violation of the law or the principles described in this policy.

16. Strictly prohibit employees, shareholders, members of corporate governance bodies, business partners, suppliers, allies, and other related third parties from making or accepting facilitation payments, understood as payments made or received to ensure or expedite the performance of routine action or actions necessary for a counterparty to exercise a legal or other right.

17. Commit their counterparties to strictly comply with policies on gifts, presents, invitations, and hospitality, ensuring that under no circumstances can these items be interpreted as attempts to influence business decisions or generate conflicts of interest.

18. Require their counterparties to report, through designated channels, any situation that may constitute an act of Corruption or Transnational Bribery. Such reports will be managed in accordance with internal policies, guaranteeing confidentiality and due process.

19. Prioritize prevention, without neglecting detection and remediation of possible irregularities.

20. Maintain mechanisms of control, communication, and reporting to prevent, detect, and respond promptly to possible acts of Corruption or Transnational Bribery.

21. Have established the Integrity Channel as a secure, confidential, independent, and accessible mechanism, administered by an independent third party, through which any person may submit inquiries, seek guidance, or report irregularities, suspected misconduct, or potential violations of applicable law or corporate policies. Reports and inquiries may be submitted on an identified or anonymous basis, as applicable. Reports will be handled in accordance with the principles of confidentiality, objectivity, due process, and protection against retaliation. The Integrity Channel

may be accessed through the web portal, electronic form, email, telephone line, voicemail, in-person interview, or postal address made available by Grupo Empresarial Colpatria.

Up-to-date information on the available reporting channels is provided on Grupo Colpatria's Integrity Channel portal: https://www.integridadcolpatria.com/

22. Address with utmost seriousness any indication or complaint related to Corruption or Transnational Bribery. All reported situations will be will be dealt with in a timely and rigorous manner under the principles of confidentiality, integrity, transparency, objectivity, and respect. Complaints will be assessed, regardless of their magnitude or the role of the individuals involved, as part of the duty to act responsibly, protect the credibility of the Obligated Entities, and strengthen the culture of compliance.

23. Evaluate any indication of irregularity with confidentiality, transparency, and objectivity, respecting the rights of those who report or participate in the processes.

24. Guarantee that no one will be subject to retaliation for rejecting or reporting improper practices. The Obligated Entities value ethical leadership.

25. As part of their commitment to social responsibility and strengthening democracy, the Obligated Entities may make donations or contributions for democratic purposes to political parties, movements, and significant groups of citizens. Such contributions are made in full compliance with current legislation, within the limits established by the competent authorities, and with complete transparency. Under no circumstances do such contributions seek to obtain undue advantages or irregularly influence public decisions.

    The authorization of donations with democratic purposes is an exclusive power of the Board of Directors of Mercantil Colpatria S.A., in its capacity as the holding company of Grupo Empresarial Colpatria, which has been delegated to the Chairman of the Board. The Chairman is responsible for: (i) approving or rejecting the proposed donation, (ii) determining the donation amount, and (iii) defining the recipient (beneficiary).

26. Do not engage in, promote, or finance lobbying activities, and prohibit their employees, executives, and third parties from exerting undue influence on authorities. All interactions with public entities must be limited to what is strictly necessary for the conduct of business, carried out with transparency, legality, and traceability, and subject to established internal procedures and controls.

27. All information derived from the application of this policy is subject to confidentiality, which means that it may only be disclosed to the competent judicial or administrative authorities. Consequently, the Obligated Entities require their counterparties to maintain absolute confidentiality regarding the information prepared and shared in relation to the PTEE, especially that which has been reported internally or provided to the competent authorities, unless required by those authorities.

28. Commit their counterparties to the obligation to safeguard the information derived from the application of this policy and to limit its use strictly to the purposes strictly established by law,

including responding to information requests from the Attorney General's Office, competent authorities, or control entities.

29. Have a disciplinary regime established in their Internal Work Regulations, which sets forth clear sanctions for breaches of contractual or regulatory obligations, including non-compliance with the provisions of the Business Transparency and Ethics Program (PTEE). The consequences will be applied according to the seriousness of the offense.

30. May report acts of corruption or transnational bribery identified in investigations or prior verification work to the competent authorities.

7. VERSION AND UPDATES

Updates to the Anti-Corruption and Anti-Bribery Policy and to the Business Transparency and Ethics Program (PTEE) shall be approved by the Highest Governing Body of each Obligated Entity whenever changes occur in the operations of such Obligated Entities that alter or may alter the level of Corruption/Transnational Bribery (C/TB) risk, or at least every two (2) years.

Considering that this Policy has a particular impact on third parties, once approved by the Highest Governing Body, it shall be published on the holding company's website. Any amendments thereto must be disclosed with the same level of visibility.

8. CONTROL OF AMENDMENTS MADE TO THE POLICY

VERSION	APPROVAL DATE	DESCRIPTION OF CHANGES	PREPARED BY	REVIEWED BY	APPROVED BY
05	26/09/2025	The Anti-Corruption Policy is now presented as a standalone document, separate from the PTEE Manual.	Compliance Officer	Risk and Audit Subcommittee	Board of Directors
06	27/02/2026	A reference to the Highest Governing Body is included. The Ethics Line email address is included.	Compliance Officer	Risk and Audit Subcommittee	Highest Governing Body of each Obligated Entity
07	25/09/2026	Incorporation of provisions and guidelines related to the implementation of the Integrity Channel.	Compliance Officer	Risk and Audit Subcommittee	Highest Governing Body of each Obligated Entity