

BANCO DAVIVIENDA S.A.

TRANSPARENCY LINE / REPORT 2019



We are an organization with an open-door culture in which we have different channels available for our employees to express their opinions freely when they detect possible irregularities, violations of the code of ethics and conduct or other facts that violate the principles and values of the Group. These channels are: our leaders, the human resources area, and the transparency line. With the foregoing, we contribute to the sustainability of ethics and transparency in the Bank and its subsidiaries and we strengthen the relationships of trust within the Organization.

Every employee is committed to ensuring that these principles and values are part of our essence

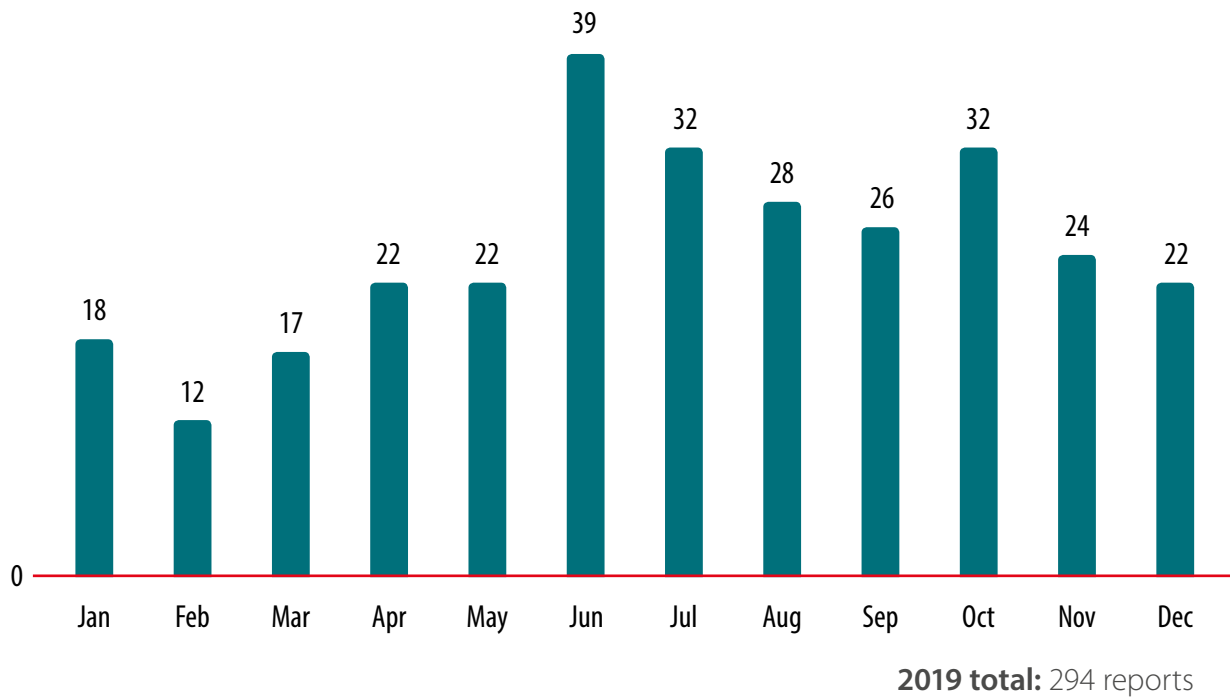
and that they are present in the way we behave with our colleagues, work teams, customers, suppliers, and community.

We have a management model defined for each of the cases received with the purpose of resolving in depth the different situations that arise.

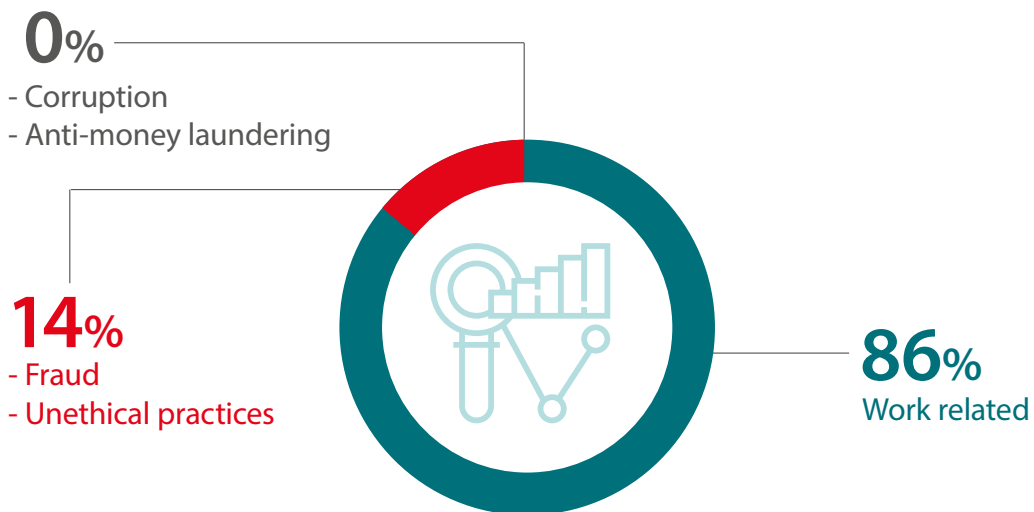
The information of all the cases received and managed through the transparency line is shared and analyzed, with different periodicities, at different levels: Ethics Committee, Audit Committee, Davivienda's Board of Directors and the Board of Directors of the Bolívar Group.



2019 TRANSPARENCY LINE MONTHLY BEHAVIOR



DISTRIBUTION BY COMPLAINT ISSUES



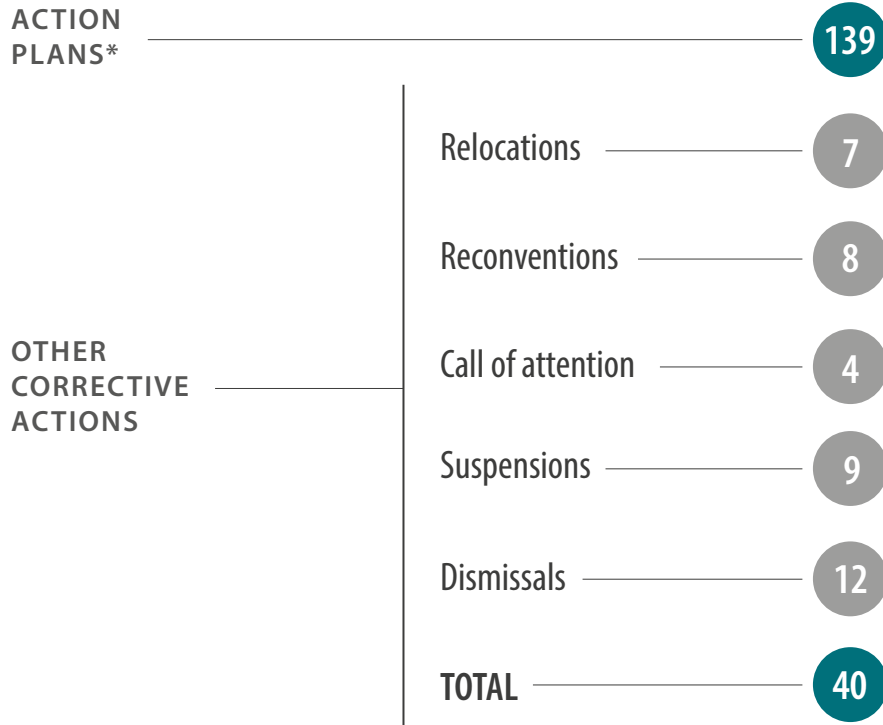
2019 TRANSPARENCY LINE CASES BY CATEGORIES

	REASONS	NUMBER	
WORK	Working environment	109	
	Abuse of office	22	
	Discrimination	4	
	Inadequate behavior	17	
	Workplace harassment	10	
	Conflict of interest	25	
	Breach of politices	47	
	Fraud	9	
FRAUD OR BAD PRACTICES	Control, law, and regulation violations	0	
	Poor business practices	15	
	IT crimes	3	
	Deviation in processes	15	
	Disclosure of confidential information	1	
	Theft and/or misplacement	1	
	Inadequate offerings	4	
	Misuse of resources	4	
	Disloyal Management	1	
	Bad practices	1	
	Anti-money laundering	0	
	Free of charge services	0	
	Corporate Image Issues	2	
	Loss of assets	4	
		TOTAL	294*

* Of the 294 cases received in 2019 through the transparency line, 61% (179) were closed with corrective actions and 39% (115) correspond to cases that were deemed not pertinent, because of incorrect or insufficient information.



2019 TRANSPARENCY LINE CORRECTIVE ACTIONS TAKEN IN CASE OF VIOLATIONS OF THE CODE OF ETHIC



* Action plans are formulated with the purpose of accompanying those officials who showed wedges in their leadership style or opportunities for improvement in the management of the processes under their responsibility.

