



Línea de
Transparencia

Banco Davivienda S.A.



TRANSPARENCY LINE REPORT 2022

VIGILADO SUPERINTENDENCIA FINANCIERA DE COLOMBIA



DAVIVIENDA

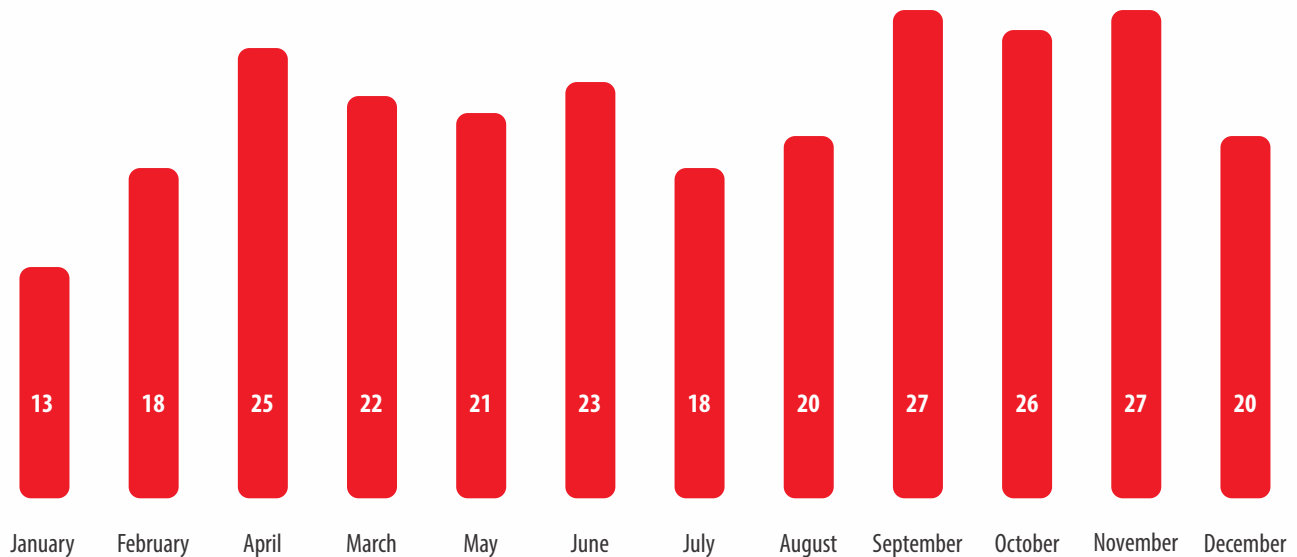
We are an organization with an open-door culture, where we have different channels available for our employees to freely express their opinions when they identify potential irregularities, violations of the code of ethics and conduct, or other events that undermine the principles and values of the Group. These channels include our leaders, the human resources department, and the transparency hotline (phone line, email, and web form). With this approach, we contribute to the sustainability of ethics and transparency in the Bank and its subsidiaries, while also strengthening trust within the organization.

All employees are committed to ensuring that our principles and values are part of our essence and to ensuring that they are present in the way we behave and act on a daily basis with colleagues, teams, clients, suppliers, and the community.

We have a defined management model for each of the cases received, with the purpose of addressing the different situations that arise at their core. Cases are classified and managed by the responsible areas according to their content as follows: Human Resources handles labor-related issues, Internal Audit deals with fraud and misconduct, and the Compliance Unit (SARLAFT) addresses cases related to money laundering and corruption.

Information on all cases received and managed through the transparency line is shared and analyzed at different intervals in the Ethics Committee, the Audit Committee, the Bank's Board of Directors, and the Bolívar Group's Board of Directors.

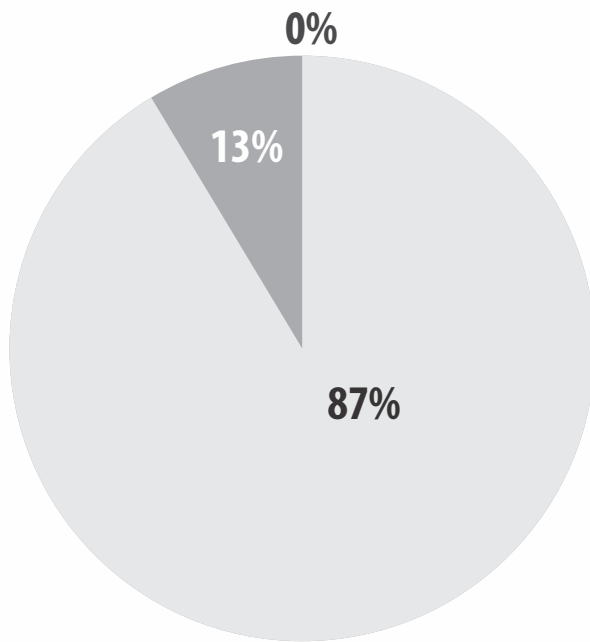
Transparency Line 2022



Total year 2022: 260 complaints received

Transparency Line 2022

Issues subject to complaint



2022 graph data:

- 87% Labor
- 13% Fraud / Bad Practices
- 0% Corruption / Money laundering



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	Motives	Amount	
EMPLOYMENT	Work environment	86	
	Abuse of power	9	
	Discrimination	2**	
	Inappropriate treatment	42	
	Workplace harassment/sexual harassment	12**	
	Conflicts of interest	13	
	Violation of HR policies	50	
	SUBTOTAL	214	
	FRAUD AND/OR MISCONDUCT	Fraud	26
		Violations of controls, laws, and regulations	2
Unfair business practices		7	
Cybercrimes		1	
Process deviation		6	
Disclosure of confidential information		0	
Theft and/or loss		0	
Improper gifts		0	
Misuse of resources		2	
Unfair administration		0	
Misconduct		0	
Money laundering		0	
Charging for free services		0	
Corporate image issues		2	
Asset loss		0	
SUBTOTAL		46	
TOTAL	260*		

*Note: Out of the 260 cases received in 2022 through the transparency hotline, 57% were closed with corrective actions, and the remaining 43% were cases that were deemed: not applicable, with incorrect information, or insufficient information.

**Cases related to discrimination and harassment were reported, and after proper handling and diligence, they were not substantiated.

Transparency Line 2022

Corrective actions in cases of Code of Ethics non-compliance

ACTION PLANS**:

Action plans

114

78%

Relocations

10

6%

Reprimands

1

1%

Warnings

3

2%

OTHER CORRECTIVE ACTIONS:

Suspensions

5

3%

Terminations

14

10%

TOTAL

147



**Note: Out of the 260 cases received in 2022 through the transparency line, 57% were closed with corrective actions, and 43% correspond to cases that were deemed: not applicable, with incorrect information, or insufficient information.

Management Model Scheme:

Employee / Supplier

Supplier

Legal VP

Area management

Ethics Management Leader
HR Assistant Managers, Leaders



Report



Reception, registration, and assignment of motives.



Assignment of responsible area



Analyst and case management

HRBP/
HR Assistant Managers
Ethics Management Leader
Leaders



Action plans, closure, and response to complainants

All managed cases are shared and analyzed in the Ethics Committee.

Comprehensive Performance Measurement

With the aim of strengthening our employees' commitment to the preservation of our principles and values, we have implemented a **Comprehensive Performance Measurement** conducted annually. This tool enables us to assess our operational practices in alignment with our overarching purpose of "Enriching Life with Integrity."

Within this systematic, periodic, and company-wide measurement framework, one dimension consistently under evaluation pertains to "Embodying and Safeguarding the declared principles and values." The most recent results indicate that the overall compliance level among our employees falls within the expected parameters.

View Results

