



DAVIVIENDA
INFORME



Línea *de*
Transparencia
2023





2023 TRANSPARENCY LINE REPORT

Ethics has always been a cornerstone of our culture, cherished by our employees, clients, shareholders, suppliers, and the broader public. To uphold transparency in our management, we have implemented a robust **Corporate Governance System**. This system ensures that our actions and behaviors are guided by principles and values such as respect, fairness, honesty, discipline, joy, enthusiasm, and good humor.

Similarly, we are committed to safeguarding the well-being and quality of life of our employees by fostering an **environment that prioritizes holistic health—balancing physical, mental, and social aspects**. We achieve this through comprehensive programs, tools, and strategies designed to help us reach our full potential within a work environment that is healthy, safe, and well-balanced, motivating us to meet our organizational goals.

Our guiding principle, "Enriching Lives with Integrity," shapes our everyday actions. We cultivate an **open-door culture** that provides our team with the space and channels to raise concerns about any perceived violations of their rights, principles, and values, or to report any irregularities or unethical practices that may breach our Code of Ethics¹, Conflict of Interest Manual, and other policies. This approach helps us build strong relationships and maintain a trustworthy environment.

To further support this commitment, we offer the **Transparency Line** as an additional resource alongside traditional channels (such as leaders and the Human Talent team). This ensures that ethical behavior is upheld through collective adherence to our principles and values. Our management and governance model is designed to address and thoroughly investigate every reported case, reinforcing our dedication to integrity and transparency.

Our transparency model addresses cases of **discrimination, harassment, human rights issues, and cybercrime**, with dedicated reporting categories for each area. When a case is reported, we activate a comprehensive protocol that includes assessing the information, listening to all involved parties, and determining, based on the evidence, whether an action plan is needed to address any identified areas for improvement.

¹ Our Code of Ethics is a fundamental component of the Corporate Good Governance System adopted by the Bolívar Group companies. It outlines the behavioral guidelines that must be adhered to by all members of our community, and also identifies unacceptable behaviors or poor practices that are not aligned with our organization's values. For further information, please refer to the Code of Ethics, pages 10, 11, and 12.



Annually, we reaffirm our commitment to ethical practices by inviting our team to complete the **"Living and Upholding the Five Principles"** certification. This course is designed to sharpen judgment in situations that may impact our Code of Ethics and our core Principles and Values. Additionally, the certification provides **training on workplace discrimination and harassment**, underscoring our **dedication to fostering trustworthy environments as outlined in our Leadership Model**. In 2023, we proudly achieved a 99% certification compliance rate.

Every member of our organization is committed to embedding these principles and values into our core, ensuring they guide our daily interactions with colleagues, teams, clients, suppliers, and the broader community.

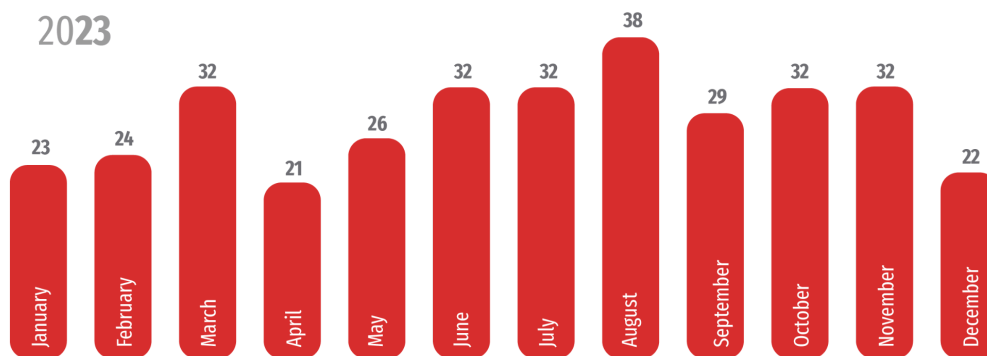
Information on all cases managed through the Transparency Line is regularly **reviewed and discussed** with the Ethics Committee, the Audit Committee, the Bank's Board of Directors, and the Bolívar Group's Board of Directors. This rigorous oversight reinforces our dedication to integrity and transparency.



Transparency Line Figures

This report unveils how our **Transparency Model** was put into action in 2023, illustrating the key initiatives and strategies that are driving us to cultivate an even healthier and more harmonious work environment for our employees, suppliers, and the wider community.

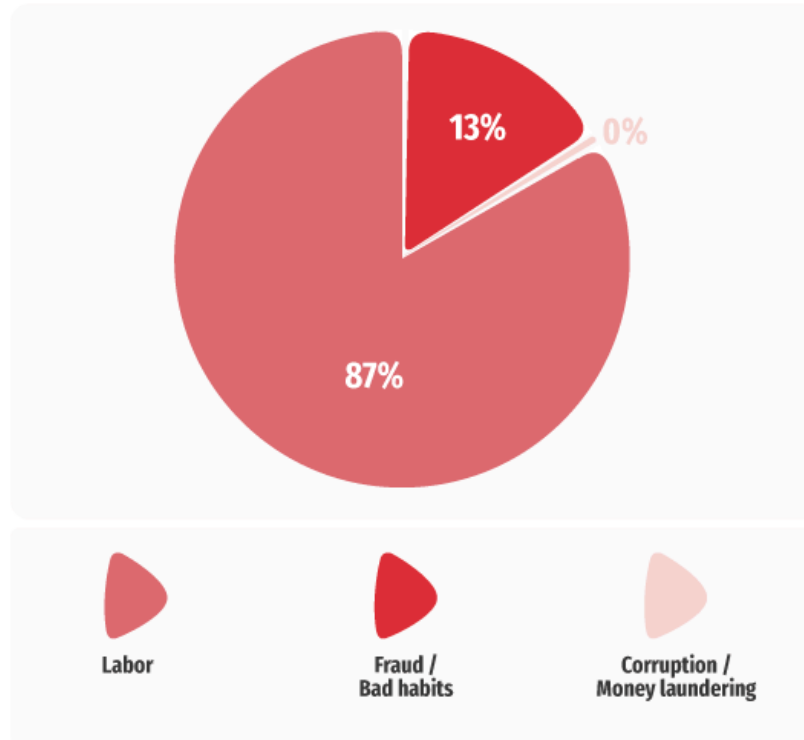
Monthly Trends



343 cases received in 2023



Issues reported



2023 Transparency Line Management

We actively encourage the use of the Transparency Line, and we're proud that our team views it as an essential communication tool within a safe and trusted environment where every concern is taken seriously.

In 2023, our management model **handled 343 reports**, each meticulously **investigated and analyzed by our expert teams**. As a result, **corrective actions were implemented in 162 cases** where the concerns were substantiated.

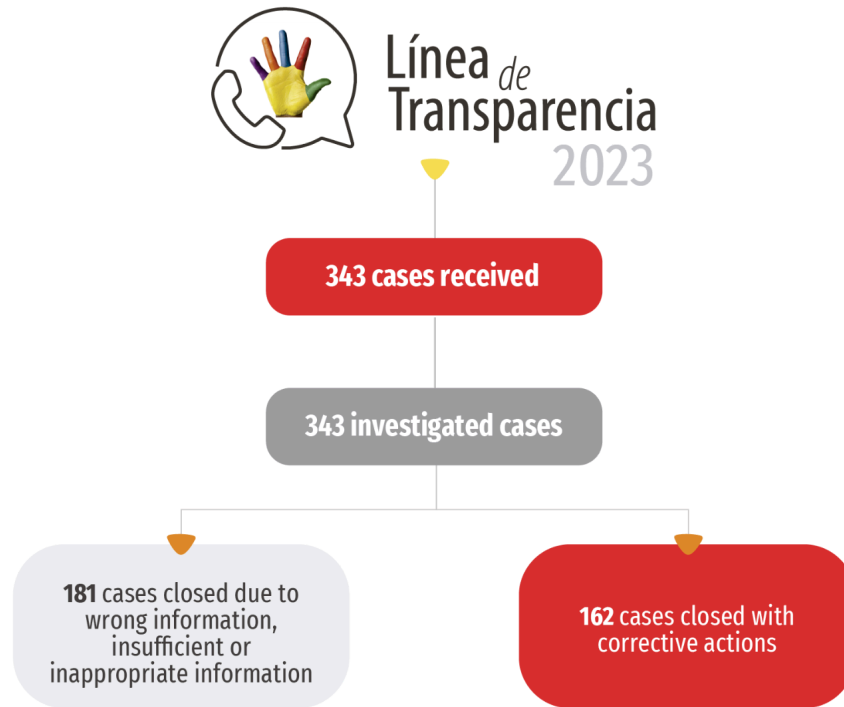


Work Environment	>	102
Labor Harassment	>	0
Non-compliance with HR policies	>	10
Conflicts of Interest	>	7
Abuse of Position	>	3
Discrimination	>	0
Human Rights	>	0
Threats	>	0
Fraud	>	12
Procedural Fraud	>	0
Computer Crimes	>	0
Damage to Corporate Identity	>	2
Bad Business Practices	>	24
Third Party Irregularities	>	2
Anti-Money laundering and Counter Terrorism Financing	>	0
Breach of Controls, Laws, and Regulations	>	0
		Total
		162

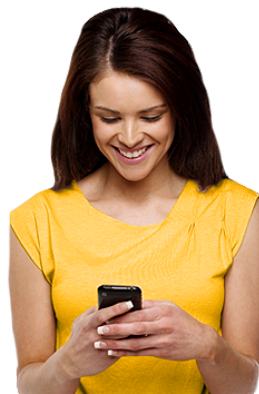
Our analysis of these reports uncovered that 47% of the cases received through our Ethics and Transparency Ecosystem led to decisive corrective actions. Meanwhile, 53% were determined to be non-actionable due to incorrect or insufficient information.



Cases that led to corrective actions



We carefully investigated the reported cases of discrimination and harassment with thorough attention and found no evidence to support the claims.





Corrective and disciplinary actions implemented in response to violations of the Code of Ethics

Our transparency management model is designed to comprehensively receive, investigate, and analyze each case, focusing on consistency and fairness in alignment with our guiding principles. This approach allows us to create targeted action plans that address and improve the identified areas for enhancement.



	2023	
Corrective actions	# people	%
Action plans	122	69%
Relocations	15	8,5%
Reprimand	1	1%
Warning	1	1%
Suspension of contract	14	8%
Termination of contract	23	13%
Subtotal	176*	100%
Termination of contract** (For regulatory violations)	137	
Total	313	

*At this item, actions are measured by the number of individuals involved.

**The tally of corrective actions relates to cases reported through various sources and associated with regulatory non-compliance.

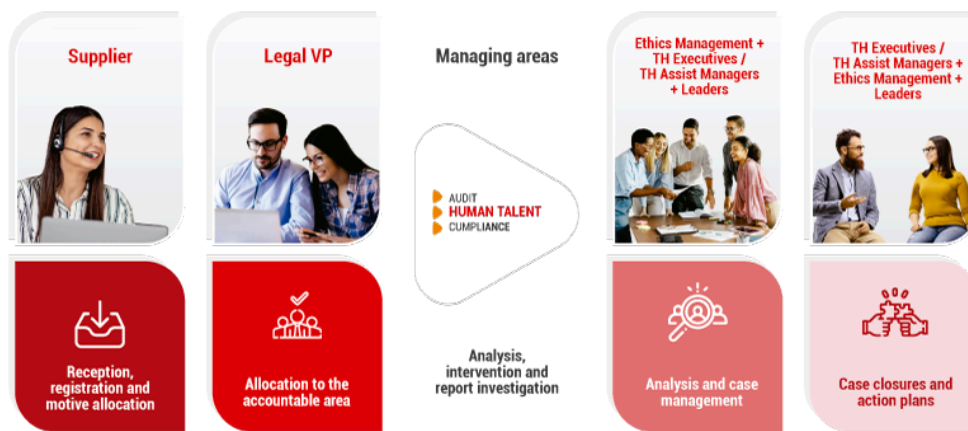
Note: The action plans have been designed to support employees where gaps in leadership style or opportunities for process management improvements have been identified.



Transparency Management Model Framework

Over the years, we've enhanced our transparency model by integrating a range of mechanisms that allow us to thoroughly analyze, diagnose, address, and resolve cases. We also provide clear communication channels for our suppliers to report any irregularities and to use our Transparency Line with complete confidence, whenever needed.

Here's how our model operates:



All managed cases are shared and analyzed by the **Ethics Committee**

****Cases reported through the channel, including those related to discrimination, workplace harassment, or human rights, are managed through this model. Following a comprehensive investigation and due diligence, we take decisive action to address each issue.*

To learn more about the **Transparency Management Model**, see the **2023 Annual Report**.



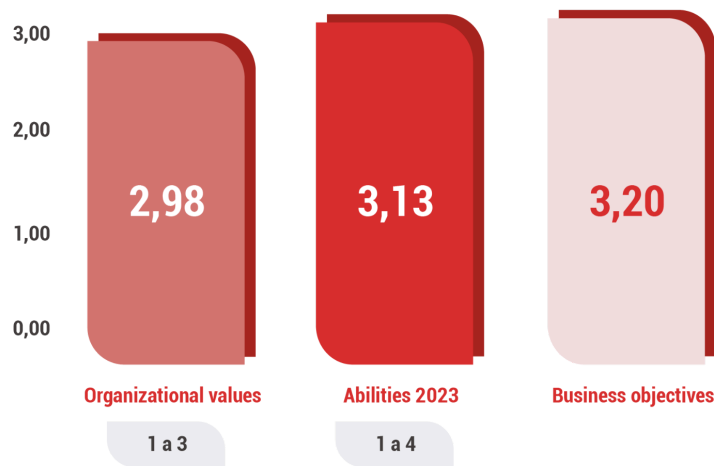


Comprehensive Performance Measurement

Our comprehensive performance measurement employs a multidimensional approach. Through **Development Assessments**, we gauge how well employees align with our core values and culture, their contributions to the business, and their progress towards personal goals. We encourage reflection on how our **Principles and Values** are embodied, offering a holistic view of talent that helps identify improvement opportunities and drives actions for continuous growth and goal achievement.

This measurement framework is systematic, regular, and inclusive of all employees. Recent results reveal that our team's overall performance is consistently meeting expected standards.

See the results of the comprehensive performance measurement for 2023:



For 2023, the organizational values measurement scale ranged from 1 to 3, with 1 being the lowest rating and 3 the highest.