GENERAL GUIDELINES ON THE MANAGEMENT AND ADMINISTRATION OF CORRUPTION RISK
THIRD-PARTY INTERMEDIARIES (TPI's)

1. 1. DEFINITION OF TPI's

Third-Party Intermediaries (TPI's) is any external (natural or legal person) used by Occidental Bank Barbados, directly or indirectly, to carry out a transaction on a particular or periodic basis with the aim of selling Occidental Bank Barbados products or services or buying goods and/or services for Occidental Bank Barbados. Intermediaries can be defined as independent organizations or individuals acting on behalf of Occidental Bank Barbados. Occidental Bank Barbados has a determining influence with them; they often carry out day-to-day business activities, such as obtaining licenses, permits, or other authorizations, and are involved in business development.

2. OBJECTIVES

2.1. GENERAL OBJECTIVE

Announce to Third-Party Intermediaries (hereinafter TPI's) of Occidental Bank Barbados, the general guidelines for managing and administering corruption risk.

2.2. SPECIFIC OBJECTIVES

Promote an ethical culture regarding the relationship with third parties through guidelines to mitigate corruption risks during the selection, contracting, and development process of procured activities, under the principle of "Zero tolerance."

Provide guidelines to prevent, detect, investigate, and timely remediate practices that, if not adequately addressed, could lead to the materialization of corruption events in the relationship between Occidental Bank Barbados and its TPIs.

3. SCOPE

TPI's of Occidental Bank Barbados.

4. REGULATORY FRAMEWORK

As a regulatory framework, Occidental Bank Barbados considers within its guidelines what is described in the following national and international laws:

- Law 1778 of 2016
- International Standard ISO 37001 Anti-Bribery Management System.
- Colombian Penal Code and Colombian Anti-Corruption Statute (Law 1474 of 2011)
- Foreign Corrupt Practices Act of 1977 or FCPA
- Sarbanes-Oxley Act - SOX

5. GUIDELINES

5.1. FACILITATION PAYMENTS

Occidental Bank Barbados does not accept to give or receive payments, bonuses, fees, commissions, retainers, per diem, checks, debit cards, or any other document that may be changeable into money, to expedite processes and procedures carried out before a third party or in favor of a third party, also known as "Facilitation Payments."

General guidelines on some particular transactions are described as follows:

5.2. GIFTS AND INVITATIONS (Occidental Bank Barbados collaborator delivers to TPI)

Giving gifts and invitations by an associate of Occidental Bank Barbados to a TPI will be governed within the following guidelines:

May be offered:

- Promotional or institutional items such as umbrellas, caps, pens, calendars, diaries.

- Articles on special dates such as Christmas, Valentine's day, Secretary day, Children's day, Women's day, among others, as long as they do not exceed 0.5 current legal monthly minimum wages (SMMLV) cumulative per year to the same beneficiary in the same calendar year.

- Invitations to events related to the ordinary course of the business, such as breakfasts, lunches, dinners, cocktails, workshops, seminars, travels and, in general, activities to demonstrate services or products, as well:

    a. Seminars, courses, and others as events for academic or training purposes, provided that they are events that do not exceed two (2) days, the two (2) current legal monthly minimum wages (SMMLV) per invited person.
    b. Invitations for breakfasts, lunches, and dinners provided that it does not exceed two (2) current legal monthly minimum wages (SMMLV), accumulative during a current year to the same beneficiary, as long as it does not exceed four (4) events in the same year.
    c. Invitations and tickets to entertainment events as long as they do not exceed two (2) current legal monthly minimum wages (SMMLV), cumulative during a current year to the same beneficiary, as long as they do not exceed four (4) events in the same year.
    d. Inauguration events of works carried out by Grupo Aval or any of its subordinate entities develop its corporate purpose (For example, highways, hotels, civil projects, new bank offices).

5.3. GIFTS AND INVITATIONS (TPI delivers to an Employee of Occidental Bank Barbados)

Occidental Bank Barbados collaborators for accepting gifts and invitations received by a TPI will be governed within the following general guidelines:

- Under no circumstances, gifts or invitations may consist of money or any other equivalent to cash such as bonds, checks, debit or credit cards, and securities.

- The gift or invitation may not exceed two current legal monthly minimum wages (SMMLV), and they are not received more than once in the same quarter by the same third party.

- Under no circumstances, the receipt of the gift or attention may have the capacity to influence in an undue or illegal way the Collaborator's conduct and decision-making.

- They are not given during or in the three (3) months following a negotiation.

** Note: for accepting gifts and invitations apply, mutatis mutandis, the same conditions of numeral 5.2 literal a) to d)*

5.4. OTHER SPECIAL OPERATIONS

If the TPI considers conducting activities such as sponsorships, donations, public contributions, and/or policies on behalf of Occidental Bank Barbados, it must comply with the specific guidelines for each of these special operations.

6. AUDIT AND ANTI-BRIBERY CLAUSES

Occidental Bank Barbados reserves the right to include in the contracts (or the document that takes its place), the audit clauses that allow the compliance inspection of these guidelines, as well as to include the anti-bribery clause where the parties declare that they know and are bound to comply with local and international anti-corruption provisions strictly.

Failure to comply with the obligations described will constitute grounds for immediate termination of the contract, without any breach and any compensation.

7. OCCIDENTAL BANK BARBADOS ETHICAL GUIDELINE

Occidental Bank Barbados makes the OCCIDENTAL BANK BARBADOS ETHICAL GUIDELINE available for its TPI's and other stakeholders, to encourage the reporting of possible breaches of the guidelines described herein or any other behavior that goes against the corporate standards.

OCCIDENTAL BANK BARBADOS ETHICAL GUIDELINE has been established under security parameters that guarantee the confidentiality of the information provided and protect the person's identity providing the information.

The established ethical guideline is available through the website www.occidentalbankbarbados.com section About Us / Ethical Guideline.

8. EVENTUAL CERTIFICATIONS

Occidental Bank Barbados may request TPIs with whom it establishes a contractual and/or commercial relationship a certification of knowledge and compliance of the general guidelines contained herein when required.

The undersigned is a Public Translator of English – Spanish and vice versa, who certifies that this is a true copy of the original in Spanish.
Panama, September 28th, 2020.