

DAVIVIENDA 2018 TRANSPARENCY LINE REPORT

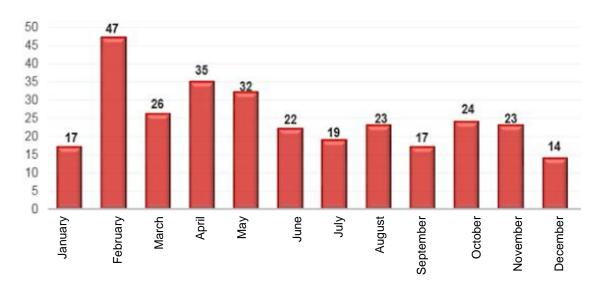
We are an organization with an open-door culture in which we have different channels available for our employees to express their opinions freely when they detect possible irregularities, violations of the code of ethics and conduct or other facts that violate the principles and values of the Group. 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.

2018 Transparency Line *Monthly Behavior*



2018 total: 299 reports



2018 Transparency Line

Issues object of report



2018 Transparency Line

Cases by categories

Issues	Reasons	Number
WORK	Working environment	137
	Abuse of office	27
	Discrimination	1
	Inadequate behavior	22
	Workplace harassment	1
	Conflict of interest	23
FRAUD OR BAD PRACTICES	Fraud	21
	Control, law, and regulation violations	14
	Poor business practices	16
	IT crimes	9
	Deviation in processes	10
	Disclosure of confidential information	9
	Theft and/or misplacement	2
	Inadequate offerings	2
	Bad practices	2
	Misuse of resources	1
	Disloyal Management	0
	Free of charge services	1
	Corporate Image Issues	1
	Loss of assets	0
TOTAL:		299

^{*} Note: Of the 299 cases received in 2018 through the transparency line, 52% were closed with corrective actions and 48% correspond to cases that were deemed not pertinent, because of incorrect or insufficient information.



2018 Transparency Line

Corrective actions taken in case of violations of the Code of Ethics

Action plans: 140

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.

Other corrective actions: 16

• Dismissals: 8 cases

• Suspension or call of attention: 3 cases

• Relocations: 5 cases