

Corficolombiana

Regulatory Compliance Reports

**COMPLIANCE REPORT External Circular Letter 029/2014 Part 1, Title 2, Chapter 1,
Numeral 2
(previous external circular letters: 042/2012, 022/2010 and 052/2007 of the
Finance Superintendence).**

For 2020, the Information Security area, in its capacity as Second Line of Defense, developed the following activities in order to maintain the principles of Confidentiality, Integrity and Availability of Corficolombiana Information assets and thus comply with the provisions of External Circular 029/2014 - part I, Title II, chapter I (Previous Circulars: 052/2008, Circular 022/2010 and 042/2012):

The CSIRT Cooperation Agreement Aval Coordinator and Related Companies is established with ATH, which aims to establish guidelines for CSIRT Aval Coordinator and Related Companies to work with each other to strengthen collaboration in research, analysis and capabilities in the management and response of digital security incidents. This is within the framework of the provision of alerts, communications and vulnerability response coordination services. It also applies to mutual assistance related to all cooperation, research, development and adjuvant activities among companies linked to CSIRT Aval Coordinator, in order to mature and strengthen the digital security ecosystem.

Preparation of the ITRM Risk Matrix for the Information Security and Cybersecurity Management process, as well as provision of advice to the IT areas of the Corporation as well as the Financial Affiliates and the real sector for the preparation of the respective ITRM risk matrices. Likewise, for the attention of cyberattacks, the documents available for taxonomies associated with the types of attacks such as: Ransomware, Denial of Services (DoS), Information Exfiltration, Intrusion and Malware, were delivered.

Monitoring is maintained through the SIEM (Security Information and Event Management System) security tool through the correlation of logs of the different security tools implemented in Corficolombiana technological infrastructure. The email authentication standard (DMARC) is maintained to prevent theft of Corficolombiana's own domains. Monitoring emails sent through the information leak prevention tool (DLP) in processes initially defined as scope continues. Likewise, the Information Security area actively participates in projects that are carried out at the corporate level, such as Platform Assurance, Digital Linking, MDM for Mobile Devices, among others.

The monitoring of activities carried out by privileged users, changes made by Database administrators, changes made to firewall rules, updates to personnel and critical positions (vacations, withdrawals, leaves, promotions, etc.), among others, continues. Likewise, to reinforce the concepts of Information Security in Corficolombiana, virtual training is carried out for all officers, as well as Information Security and Cybersecurity induction for new officers.

Activities corresponding to the certification of access to information systems were carried out, in accordance with the SOX controls set; Internal Information Security Committees are held, which is held in the GRC Committee, where the management performed by the area is reported, and there is an active participation in the holding of the Change Control Management Committees and Security Committees of both IT and Risk area where Grupo AVAL Entities participate.

In the activities specific for the remote connection of employees to perform work at home due to the corresponding restrictions generated by the COVID-19 pandemic, Information

Security and Cybersecurity guidelines and protocols were issued, and controls and alerts established in the different Information Security and Computer Security tools were monitored.

The procedures and execution of activities supporting compliance with the other numerals applicable for compliance with the circular continue to be updated and adjusted according to the needs of the business; their update is coordinated by the Information Security and Cybersecurity Area, their publication and disclosure is channeled through the Entity Productivity area.

OPERATIONS WITH SHAREHOLDERS AND MANAGERS

The operations carried out by the Corporation with its shareholders and managers are adjusted to the general policies of the Entity. Said operations are duly detailed in the notes to the financial statements.

The Corporation declares that in line with the provisions of article 37 of Law 222/1995, the information and claims that are part of the financial statements have been duly verified and obtained from the accounting records of the entity, prepared in accordance with the accounting standards and principles established in Colombia.

FINANCIAL INFORMATION DISCLOSURE AND CONTROL SYSTEM

In compliance with the provisions of article 47 of law 964/2005 on responsibility of the legal representatives of securities issuers, in the establishment and maintenance of proper financial information disclosure and control systems, throughout 2020 there were no deficiencies of internal controls that had prevented the Corporation from properly recording, processing, summarizing and presenting the financial information, or fraud that had affected the quality of the Corporation's financial information, or changes to the assessment methodology thereof.

LAW ON SECURITY INTERESTS

For the purposes provided in article 87, paragraph 2nd of Law 1676/2013, as amended by article 7th of Law 1231/2008, the managers put on record that the free circulation of invoices issued by sellers or providers was not hindered in any way.

INTELLECTUAL PROPERTY AND COPYRIGHTS

In compliance with numeral 4 of article 47 of Law 222/1995, as amended by law 603/2000, Corporación Financiera Colombiana S.A. comprehensively applied the standards on intellectual property and copyrights. Products and programs covered by copyrights are duly licensed.