



Titularizadora
COLOMBIANA



CORPORATE SUSTAINABILITY REPORT

2021

...ABOUT THIS REPORT...

In line with its commitment to managing Sustainability and the endurance of companies, Titularizadora Colombiana has been publishing its sustainability reports since 2014, whose general contents cover the basic ethical, economic, labor and environmental matters derived from the strategies adopted by management in this regard. Given that the Company is a participant in the financial system, this report adopts the best practices on disclosure of sustainability results, under the consolidated set of standards developed by the Global Reporting Institute (GRI).

We are in the process of compiling a large amount of information, which we will adjust in future sustainability report presentations, as part of our commitment to continuous improvement based on materiality analysis and stakeholder management, which have become pillars at Titularizadora Colombiana.

"This report has been prepared in accordance with the Core option of the GRI standards."



INTRODUCTION

2021 was a year of strong economic growth, with a historically high year-on-year growth of 10.6%, the highest growth rate on record. This led to the full economic recovery from the crisis caused by COVID-19 in 2020, and enabled most markets to resume growth trends similar or higher than those of 2019. For example, the labor market displayed an extraordinary rebound: close to 2.4 million jobs were created during 2021, which produced the fastest single-year drop in the unemployment rate in the country's history, from 17.6% in January to 11.1% in December.

Despite the strength in several economic fronts, some headwinds remained during the period. The international inflationary pressures produced by the positive response to the fiscal and monetary stimulus, combined with supply and logistics issues (in Colombia, widespread social protests broke out during the second quarter that prevented the normal flow of products and raw materials), led to a general increase of all inflation indicators (in Colombia's case, the inflation rate increased from 1.61% in 2020 to 5.62% in 2021). This situation produced a structural change in the monetary policy position: an increase in interest rates and a reduction in global balance sheets. The stability of fiscal balances took on special relevance during the year, particularly in developing economies, due to the fast increase in public debt and concerns about its sustainability. In fact, in the first half of the year, Colombia's credit rating was downgraded to below investment grade.

Moreover, the assets managed by Titularizadora Colombiana displayed very favorable performance during 2021. The end of the Debtor Relief Program (PAD, for the Spanish original) implemented by the Financial Superintendence was highly effective in terms of softening the cash flow difficulties experienced by debtors due to the pandemic. Currently, the overdue indicators of the underlying assets are actually better than those reported in 2019. New securitization issuances were reactivated during the year. Transactions were made for over COP 620 billion in mortgage and vehicle loans.

The real estate securitization assets under management also displayed good performance, both in terms of individual valuation and the generation of rental fees. At the end of the year, the value of the assets was 50.2% greater than in December 2020, while the collections of contractual cash flows were close to 100% of the total. Thanks to this situation, during 2021 the TIN securities displayed the best performance in terms of profitability and cash flow stability in Colombia, compared to similar real estate investment alternatives.



ORGANIZATION'S PROFILE

Titularizadora Colombiana began operations in 2001, as a central pivot for the modernization of the mortgage loan sector following the 1999 crisis. During its years in operation, it has facilitated financing of mortgage loans for over COP 25 trillion, with a balance under management at year-end 2021 of COP 3.5 trillion. Additionally, it has continuously improved its processes by developing products backed by payroll, re-discounted and vehicle loans, as well as real estate assets, whose issuance in October 2018 was the beginning of the real estate era at Titularizadora Colombiana.

2021 started out with considerable issuance activity, with the first issuance carried out through the Securities Exchange in February with the securitization of the second series of vehicle loans (COP 40 billion). Then issuances backed by mortgage loans resumed in June with the issuance of the twenty-first series of TIPS peso securities (N-21) for COP 290 billion. The last issuance of the year was made in November, with the fifth tranche of securitized mortgage loans denominated in UVR, TIPS UVR-5, for COP 215 billion.

Titularizadora Colombiana maintains its long-term vision focused on the mortgage loan system. It needs to increase both in depth and in the diversity of participants in well-segmented market niches, to enable covering a greater number of households with better credit conditions. All this under a common framework of responsibility in the origination and management of the mortgages.

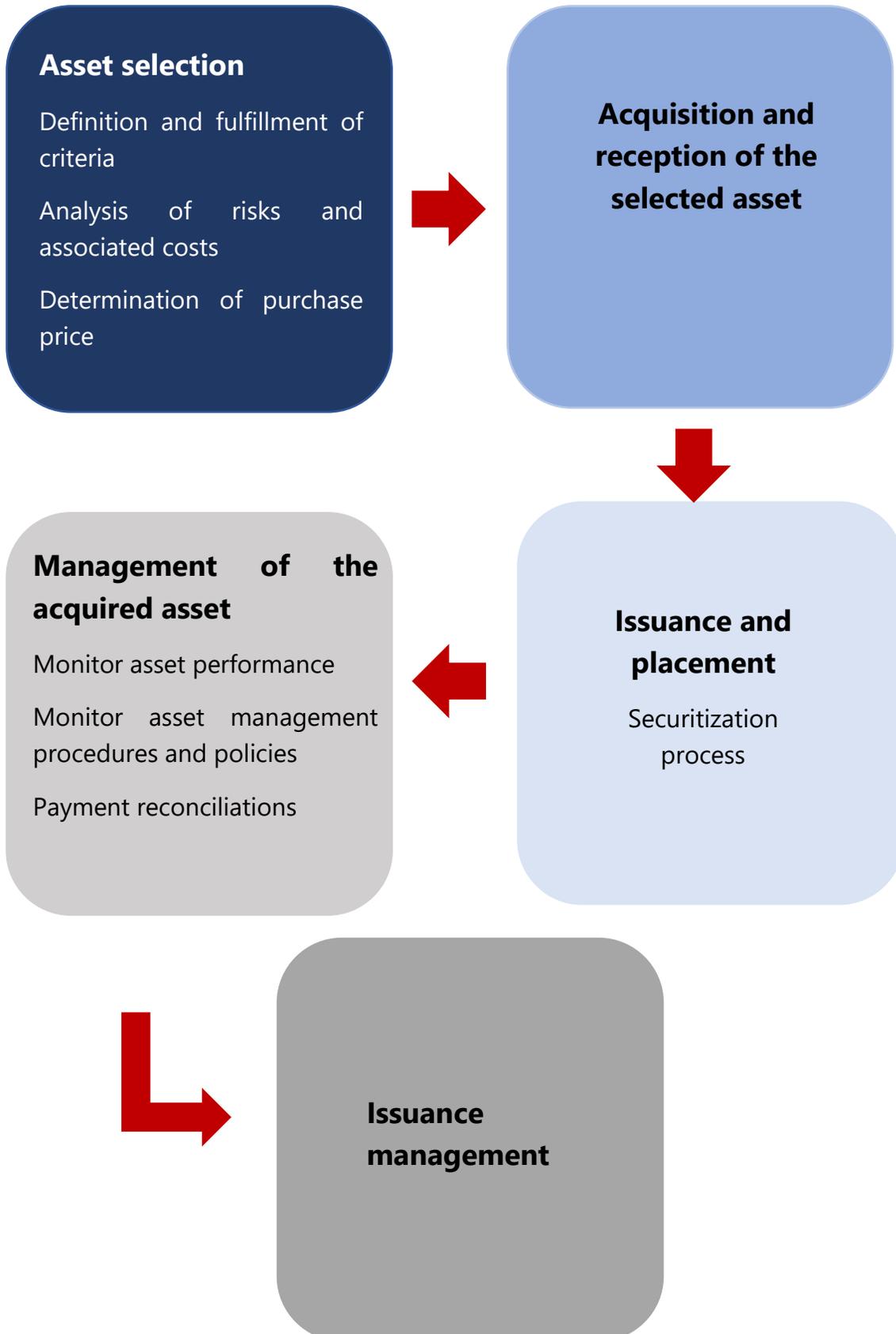
(102-1) Organization name

Titularizadora Colombiana S.A



(102-2) Activities, brands, products, and services

Main services:





Main products:

TIPS

Securitized debt instruments backed by mortgage loans of the highest quality. At 2021, a total of 55 issuances of this asset have been carried out, including loans denominated in Colombian pesos.

Securitized debt instruments backed by overdue mortgage loans. Throughout its history, Titularizadora has made 3 issuances backed by assets of this type.

TECH

TIS

Securitized debt instruments backed by mortgage loans from a cooperative originator.

Securitized debt instruments backed by re-discounted loans. Throughout its history, Titularizadora has made 1 issuance backed by assets of this type.

TER

TIL

Securitized debt instruments backed by consumer loans under the payroll loan modality. Throughout its history, Titularizadora has made 4 issuances backed by assets of this type.

Equity securities backed by real estate assets, office and retail space properties with stabilized lease contracts. Over its history, Titularizadora has issued 2 tranches.

TIN

TIV

Securitized debt instruments backed by vehicle loans. Over its history, Titularizadora has made 2 issuances backed by assets of this type.



(102-3) Location of headquarters

Calle 72 No. 7-64 Oficina 401 Edificio Acciones y Valores

(102-4) Location of operations

Colombia – Dominican Republic

(102-5) Ownership and legal form

Joint stock company (*Sociedad Anónima*)

(102-6) Markets served

Titularizadora Colombiana was created with the purpose of mobilizing financial system resources to boost growth in the Colombian mortgage loan sector. Over the years, and based on the experience it has acquired as asset manager and promoter of adding depth to the capital markets, it has ventured into the following markets:



Our originator clients:





Finanzauto

(102-7) Scale of the organization

| DESCRIPTION | |
|---------------------------------|--------------|
| Total number of employees | 70 |
| Total number of operations | 1 - Colombia |
| Net income (millions) | 4164 |
| Total capitalization (millions) | 59,855 |

Our Mission

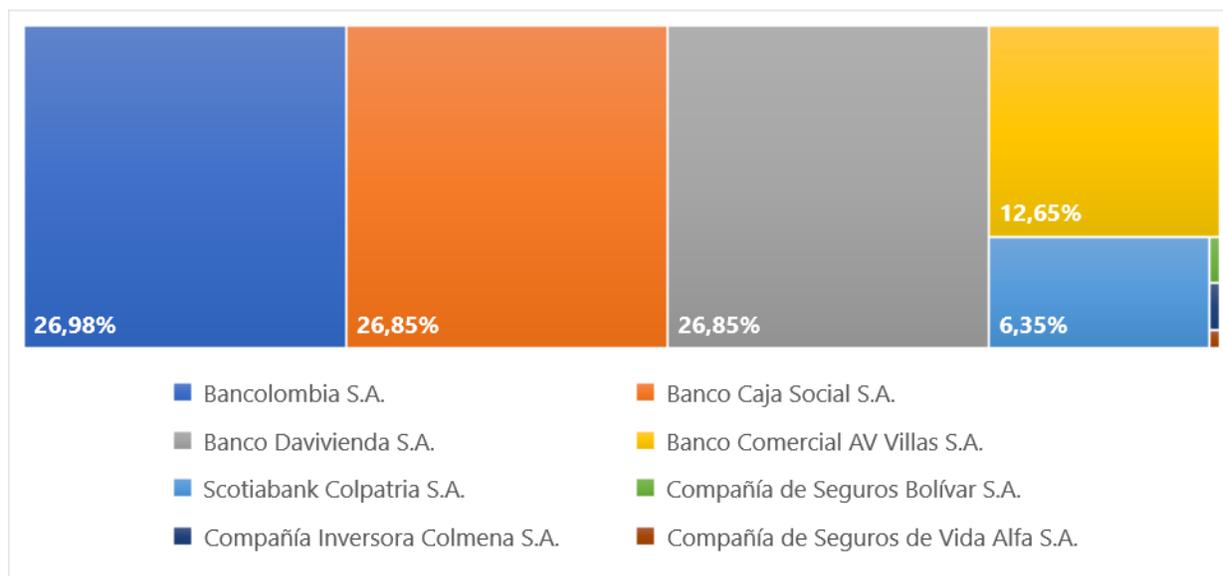
Connect the medium and long-term financing needs of different economic activities with the capital markets, with transparency and efficiency, through the securitization of assets.

Our Vision

By 2025, manage COP 15 trillion of underlying assets from different economic sectors in Colombia and abroad.



Shareholders:



Main balance sheet figures:

| ASSETS | |
|--------|-----------|
| 130,7 | 2021 |
| 138,8 | 2020 |
| -5,8 | Variación |

At December 2021, the assets of Titularizadora Colombiana totaled COP 130.673 billion, down 5.8% compared to year-end 2020. The assets are mainly comprised of financial investment assets, 52.1%; trade accounts receivable, 7.3%; investment properties, 4.4%; cash equivalents, 17.1%, and assets held for sale, 2.7%.

The main change compared to the previous year is in Financial Investment Assets, due to the realization of securities classified as held for trading to acquire investments available for sale and held to maturity, in line with management's strategy to mitigate the portfolio's volatility through diversification.

| LIABILITIES | |
|-------------|-----------|
| 6,9 | 2021 |
| 9,7 | 2020 |
| -29,2 | Variación |

The main liability is current taxes (current income tax, VAT and municipal tax (ICA)) and deferred income tax, recognized in accordance with the instructions of IAS 12 on income tax.

The biggest change compared to the previous year is the reduction in the rights of use account, calculated in accordance with IFRS 16, as a result of cancellation of the lease on the offices at Calle 100.



EQUITY

| | |
|--------------|------------------|
| 123,8 | 2021 |
| 129,1 | 2020 |
| -4,1 | Variación |

The equity of Titularizadora Colombiana decreased by 4.1% compared to the previous year, due to the lower profits reported this year compared to 2020. At year-end 2021, the Company's equity totaled COP 123,842 million.

(102-8) Information on employees

| | Permanent contract | Temporary contract | SENA and interns | Full-time | Part-time |
|---|---------------------------|---------------------------|-------------------------|------------------|------------------|
|  | 33 | 1 | 3 | 37 | 0 |
|  | 32 | 0 | 1 | 33 | 0 |



(102-9) Supply chain

The responsibilities related to supplier selection, management, monitoring and relations are specified in the PURCHASING AND SERVICE CONTRACTING MANUAL. The organization's areas work in coordination with defined activities and authorization levels in the purchasing and supplier process, aimed at receiving support throughout the supply chain.



Source: Titularizadora Colombiana

At year-end 2021, Titularizadora Colombiana had 230 suppliers classified into the following service categories. It should be noted that the supply chain includes local and foreign suppliers whose invoicing over the year totaled COP 96 billion.

| SERVICE / PRODUCT | SUPPLIER |
|----------------------------|------------------|
| Consulting | External / Local |
| Technology | External / Local |
| Trust management companies | External / Local |
| Food | External / Local |
| Funds | External / Local |
| Photocopies | External / Local |
| Rating agencies | External / Local |
| Securities market | External / Local |
| Insurance brokers | External / Local |
| Realtors | External / Local |
| Attorneys | External / Local |
| Clubs | External / Local |
| Chamber of Commerce | External / Local |



| | |
|------------------------------|--------------------------|
| Cleaning and office supplies | External / Local |
| Administration | External / Local |
| Communications | External / Local |
| Audits | External / Local |
| Foundations | External / Local |
| Florists | External / Local |
| Printing | External / Local |
| Security | External / Local |
| Lessors | External / Local |
| Human resources | External / Local |
| Institutes | External / Local |
| Publishers | External / Local |
| Restaurants | External / Local |
| Custody | External / Local |
| Brokers | External / Local |
| Liquor | External / Local |
| Sports | External / Local |
| Notaries | External / Local |
| Repairs | External / Local |
| Insurers | External / Local |
| Mail | External / Local |
| Auto maintenance | External / Local |
| Transportation | External / Local |
| Due diligence | External / Local |
| Valuation services | External / Local |
| Associations | External / Local |
| Professional services | External / Local |
| Software | External / International |

(102-10) Significant changes to the organization and its supply chain

During 2021, there were no significant changes to the organization or its supply chain.

(102-11) Precautionary Principle

Títularizadora Colombiana does not strictly follow the precautionary principle of the United Nations Rio Declaration on Environment and Development. It applies its own initiatives taking into consideration the environmental impacts and the costs the Company may incur by failing to prevent or mitigate such risks.



(102-12) External initiatives / (102-13) Membership of associations



Titularizadora Colombiana is a member of the Colombian Banking Association (*Asociación Bancaria y de Entidades Financieras de Colombia – Asobancaria*), an industry association that represents the Colombian financial sector, given its role as one of the most important non-bank financial services entities in the country. Through the association's activities, the Company demonstrates its commitment to promoting public trust in the financial sector, educating the public about financial activities, and modernizing the local industry's structure. The Company also actively participates in seminars, meetings and board meetings organized by Asobancaria, and maintains constant communication with the organization for the effects of assessing regulatory changes and their impacts and implementation.

Titularizadora additionally supports financial industry association activities through Asofondos, Asofiduciaria and ANIF.

Sustainability Committee

The Sustainability Committee is an Asobancaria initiative that promotes best practices related to:

- Green Protocol
 - o Financial innovation
- Financial education
 - o Peace Task Group: financial education and inclusion, social investment, labor market inclusion
- Corporate sustainability
 - o Supplier management
 - o Talent management
- Targeted Social Investment: in view of the new situation arising from social changes related to the peace agreements, it is necessary to address the needs of displaced and reinserted populations who will probably be users of the financial system and products, which will in turn require developing strategies to measure risk, assign loans and educational programs that address the needs of this population in particular.
- Venue to discuss best sustainability practices. Entities in the sector that have implemented sustainability programs share information to enrich the development of methodologies at entities that are newcomers in this topic.



BVC Issuers Committee

Titularizadora actively participates in the Issuers Committee of the Colombian Securities Exchange through the General Secretary and the Director of Investments and Market Development. This Committee contributes to (i) maintaining a space for open discussions with issuers on the fixed income and variable income market, (ii) improving the market practices of securities issuers, and (iii) discussing and proposing regulatory aspects.

Certifications

ISO 9001:2015 Quality Certification – Master Management

The Quality Management System at Titularizadora is a management tool that enables focusing efforts on the search for excellence through continuous improvement, supported by the standardization of processes and procedures and a focus on stakeholders.



Specifically, its focus on the Master Management of issuances includes:

- ◆ Monitoring of issuance operators, controlling and mitigating operating and credit risks.
- ◆ Compliance with the prospectus terms and conditions.
- ◆ Timely and reliable disclosure of the issuances' performance.

Voluntary Commitments

◆ Issuer Recognition (IR) – BVC



The adoption of best practices on information disclosure and investor relations has been certified by means of the Issuers Recognition (IR) granted by the Colombian Securities Exchange, which supports the management of

Titularizadora Colombiana.

The main requirements for receiving Issuer Recognition (IR) are to:

- ◆ Disclose additional information to that normally required, in English and Spanish, on the website, and keep such information updated in a timely manner.
- ◆ Periodically publish financial statements (balance sheet and income statements) and information on the issuances.
- ◆ Have a representative to field inquiries from investors, both in Spanish and English.



The adoption of best practices on information and investor relations enables providing our investors sufficient and timely information for their investment decisions and contributes to raising the standards of the Colombian capital market.

◆ **Known and Recurrent Issuer – Financial Superintendence of Colombia**



Superintendencia
Financiera
de Colombia

Titularizadora Colombiana has been certified as a Known and Recurrent Issuer by the Financial Superintendence of Colombia for having fulfilled the requirements described in section 6 of Chapter II, Title

I, Part III of the Basic Legal Public Notice of the Financial Superintendence of Colombia.

2021 Ratings

BRC
Standard & Poor's
S&P Global

During its periodic review, the Technical Committee of BRC Investor Services S.A. SCV confirmed the counterparty credit rating of Titularizadora Colombiana S.A. at 'AAA'. The Technical Committee issued this decision on February 2, 2021, as documented in Minutes No. 1872.



(102-14) Statement from senior decision-maker

Letter from the CEO



The purpose of Titularizadora Colombiana is framed in the continuous search for greater operating efficiencies in the financial system and improving access to credit for Colombian households. Throughout these more than 20 years of existence, the Company has been a major player in the modernization of the mortgage loan sector in the country. It has not only financed housing for over 2 million Colombian families, but has also promoted responsible practices to ensure financial stability when faced with difficult situations. The positive performance of the securities during the pandemic demonstrate the fulfillment of this objective and the possibility of further adding to the depth of the system without increasing the economy's vulnerability. This model has been so successful that several countries from our region are in process of emulating it.

Andres Lozano Umaña

CEO

This growth process has been replicated with non-bank originators of consumer loans such as payroll and vehicle loans. Our participation in the securitization and funding of entities of this type has enabled us to reach the credit markets of lower income households, which has helped us to honor our shareholders' commitment to promoting formalization and increasing social wellbeing. Over these two decades, Titularizadora Colombiana has channeled close to COP 25 trillion into the pockets of Colombians. All this process has been carried out with deep respect for the environment, labor rights, professional ethics and social solidarity.

Moving forward, we expect to create more opportunities for long-term financing in other economic activities. The materialization of a deeper and more sustainable financial system is indispensable in order to consolidate the country's social development and its transition towards an economy with greater opportunities for all. The team at Titularizadora Colombiana will continue to make its best efforts towards achieving this objective.



Sustainability Model

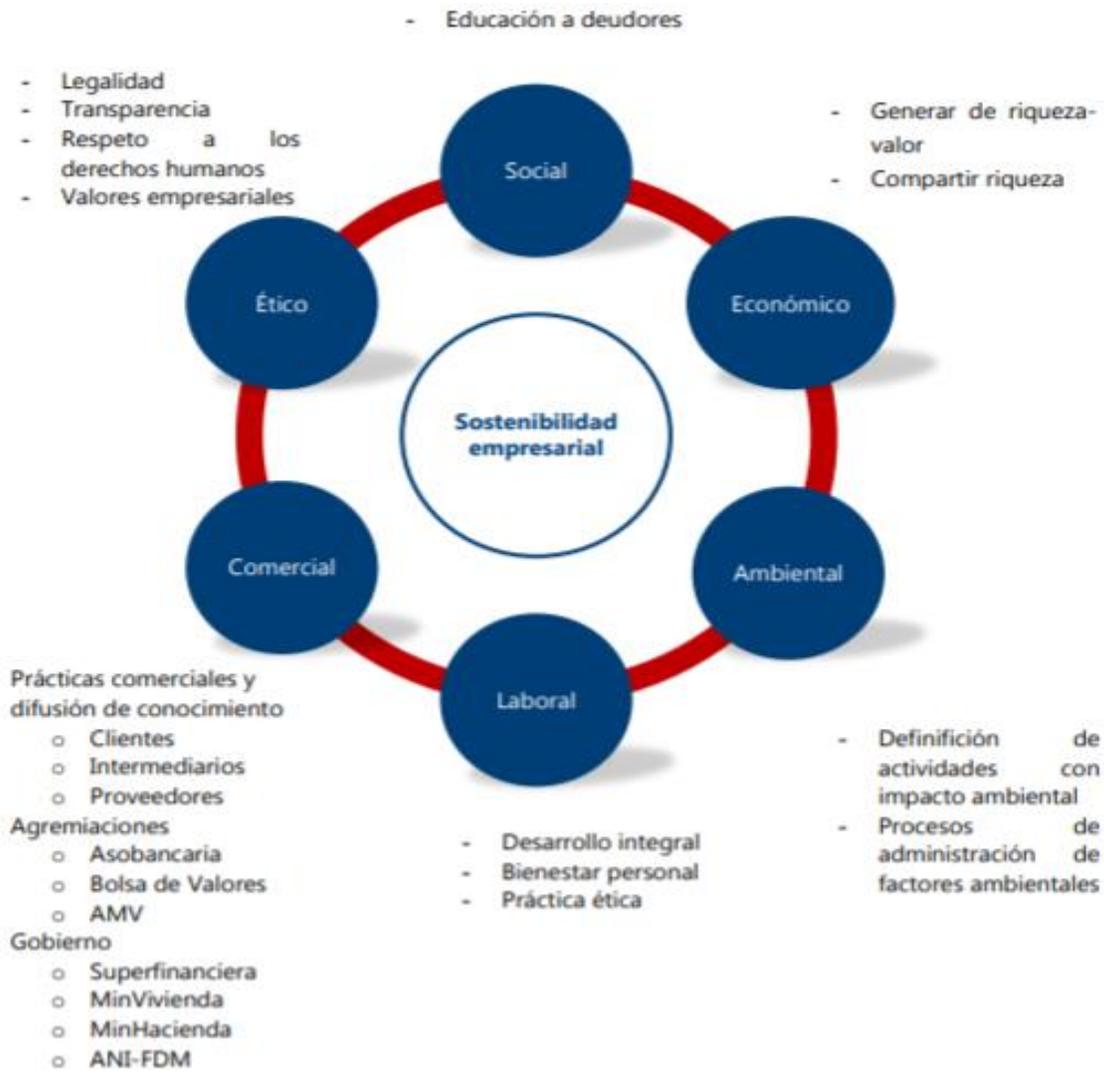
The social function of the business is part of our corporate DNA. All our initiatives give special consideration to the impact they may have on society in general, and on our stakeholders in particular. We work on maximizing the positive impact of our activities on the wellbeing of all the parties involved.

Our corporate social responsibility vision is conceived based on the concept of corporate sustainability. The activities we carry out every day are focused on the creation of a virtuous cycle of human development, cooperation and social multiplication, and not only on the static distribution of value to unrelated social groups.

In order to fulfill our mission, at Titularizadora Colombiana we are committed to a corporate sustainability and value creation model that articulates the ethical, economic, labor, social and environmental dimensions to the benefit of the community, shareholders, employees, investors, suppliers, trade associations and the environment.

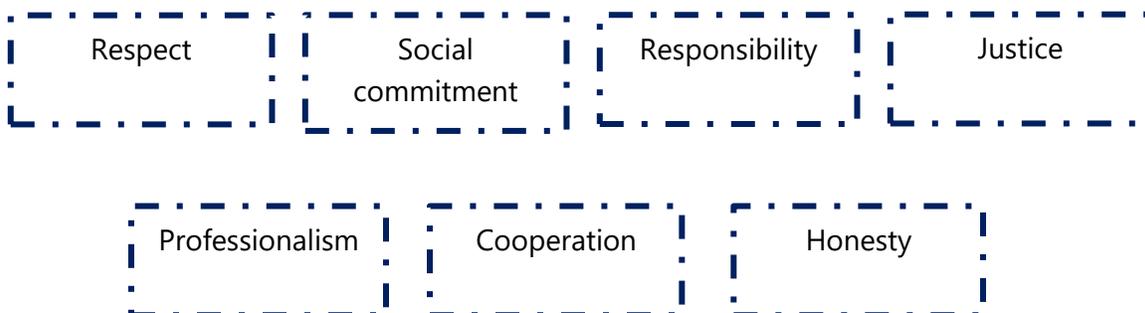
In 2021, we monitored the parameters established by the GRI. Based on studying the standard, reviewing the available information and assigning responsibilities for gathering the information required to fulfill the requirements, we have traveled a long road that has provided us the tools to learn from our organization from the perspective of sustainability, in which we are left with challenges on components that constantly shift at the speed of our originators, investors, employees and other stakeholders that make the continuity of our company possible. We are certain that each new edition of the Sustainability Report broadly reflects the progress made by Titularizadora Colombiana and that our commitment to sustainability will enable us to gradually develop each of the items included in the standard.

The information included in this report was prepared with the managers responsible for each area, who provided the necessary and sufficient inputs to develop an initial approximation to the sustainability reporting requirements, with the support of the assistant to the CEO and analysts who consolidated the information.



(102-16) Values, principles, standards, and norms of behavior

The operations of Titularizadora Colombiana are articulated by the corporate values that define our relations with stakeholders, and which have enabled us to stand out not only because of our operating know-how, but also because of our transparency and dedication in performing them. During 2021, activities were carried out that confirmed the mutual commitment implied by being part of Titularizadora Colombiana and the great commitment we have with our company, our employees and all those related to our operations.



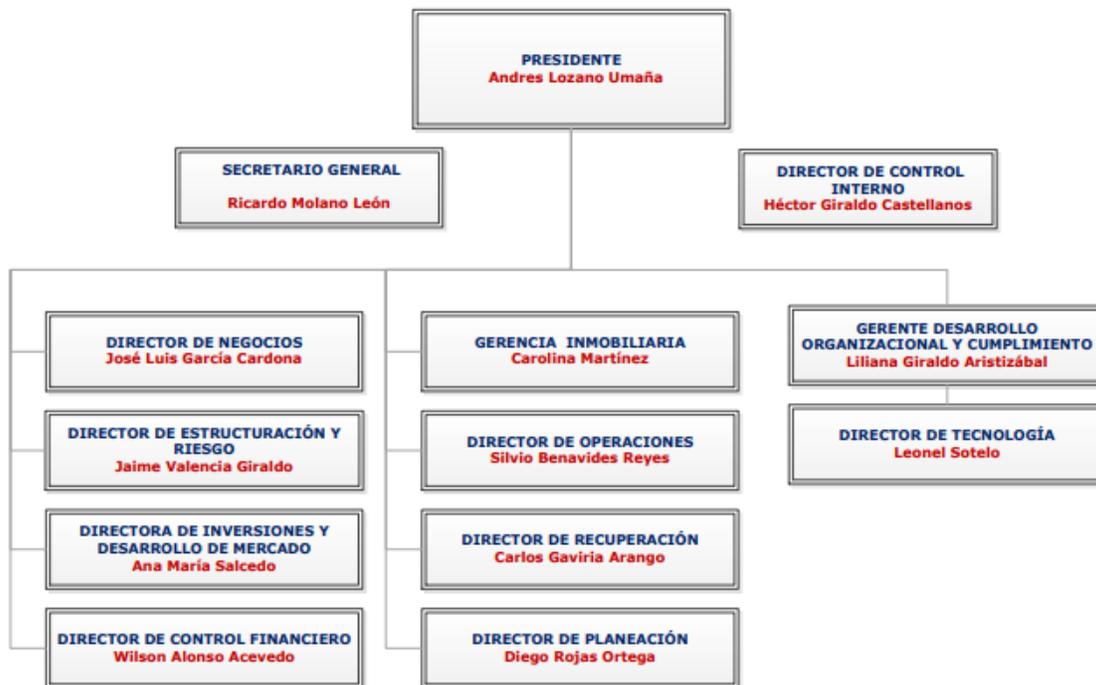


(102-18) Governance structure

Titularizadora Colombiana has a highly specialized team that is committed to making the securitization of mortgage loans the main source of financing to acquire housing.

All the Company's areas are led by professionals with extensive experience in the financial sector. The Company operates under strict principles of efficiency, supported by a leading-edge technological platform.

Excellence and high ethical standards are fundamental pillars for the work carried out by a team that wants to contribute to improving living conditions in Colombia.



It is relevant for Titularizadora Colombiana to inform that during 2021, Dr. Alberto Gutiérrez Bernal resigned to his position as the Company's CEO and principal legal representative, effective as of July 19, 2021. In view of the above, the Board of Directors implemented the succession plan for the CEO, taking into consideration the provisions of the corporate documents, and decided to appoint Dr. Andrés Lozano as the Company's CEO and principal legal representative as of July 21, 2021.



(102-22) Composition of the highest governance body and its committees

Board of Directors – Principal Members



Efraín Forero

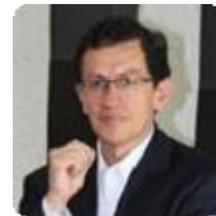
CEO

Banco Davivienda

José Humberto Acosta

Chief Financial Officer

Bancolombia



Diego Fernando Prieto

CEO

Banco Caja Social



Juan Camilo Ángel

CEO

Banco Av Villas



Beatriz Elena Arbeláez Martínez

Consultant





Board of Directors – Alternate Members



Álvaro Carillo

Corporate Executive Officer

Banco Davivienda



Nicolás García Trujillo

Corporate Executive Officer

Fundación Social



Hernán Alzate

Chief Treasury Officer

Bancolombia



Oscar Eduardo Gómez

Chief Legal Executive

C.I. Prodeco S.A



Jaime Upegui

CEO

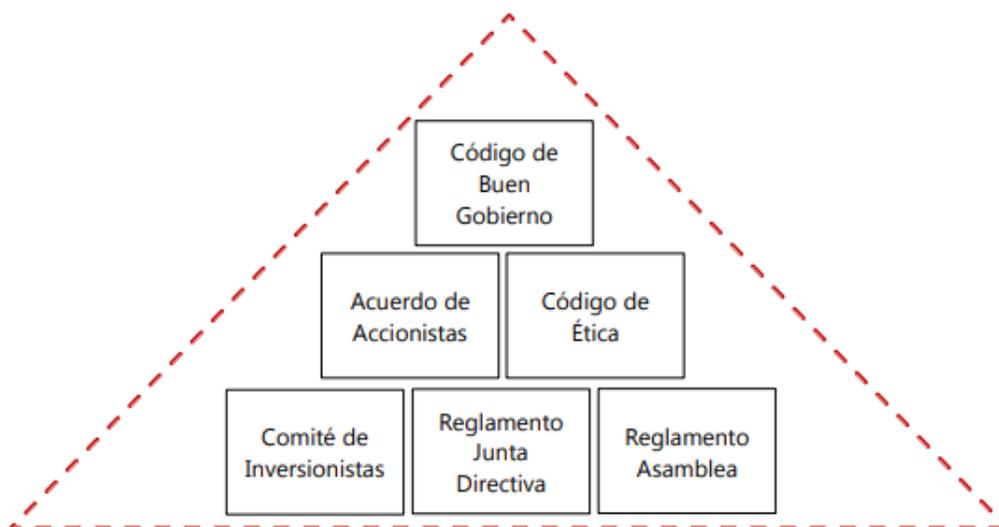
ScotiaBank



Corporate Governance

Over the 20 years of the organization, the quality of the processes, operations and methodologies has been a priority, not only for the members of the Board of Directors and Senior Management, but for all members of Titularizadora Colombiana, which it seeks to transfer to all stakeholders through the establishment of corporate governance elements that support the Company's values and principles.

During 2021, there were no changes or amendments to the Corporate Governance of Titularizadora Colombiana that would imply changes in the composition of its committees or the creation of any new committees whose role is not included in the following description.



Board of Directors Support Committees

📌 Audit Committee

Comprised of three (3) Board members with attendance by the Company's CEO, the Internal Control Director, and the Statutory Auditor. Its key role is to supervise the procedures of the internal control system of Titularizadora, verifying that they consider all risks derived from the operation of each process; oversee the integrity, reliability and transparency of the financial information prepared by the Company, and its adequate disclosure pursuant to applicable standards and laws. In addition to the provisions of applicable regulations on its operation, the Committee has its



own Internal Rules of Procedure that establish its objectives, functions, and responsibilities.

◆ **Investment Committee**

The Investment Committee is comprised of three (3) Board members, el Company's CEO, the Director of Investments and Market Development. Its main function is to oversee compliance with the policies on handling and managing the Company's liquid assets. Define portfolio investment policies and hedging and trading strategies, and investment guidelines for treasury operations and counterparty limits, in accordance with the Company's risk assessment criteria. Regarding liquidity risks, it reviews the liquidity contingency plans proposed by Management, and reviews and discusses the annual stress tests.

◆ **Appointments, Compensation and Ethics Committee**

The Appointments, Compensation and Ethics Committee is comprised of the Company's CEO and two (2) Board members. Its main functions are to: i) establish parameters, propose and review the remuneration of members of the Board, Senior Management and the Company; ii) verify the evaluations of the Board and Senior Management and of the candidates to Secretary of the Board, when requested to do so by the Board of Directors, and issue appropriate recommendations; and iii) make recommendations on any cases of complaints.

◆ **Corporate Governance Committee**

The Corporate Governance Committee is comprised of the Company's CEO, and two (2) Board members. Its main functions are to: i) assist the Board in supervising compliance and implementation of general good governance standards, and ii) prepare the annual corporate governance report to submit to the Board of Directors.

◆ **Real Estate Board Committee**

The Real Estate Board Committee is comprised of three (3) Board members and the Company's CEO. Its main function is to support the Board in the assessment of real estate deals submitted to the consideration of the Board of Directors for its approval.

Other Committees

◆ **Assets and Liabilities Management Committee (ALCO)**



It is comprised of the CEO, General Secretary, Operations Director, Structuring and Risk Director, Investment and Market Development Director. Its main functions are to: (i) assess and establish the Company's risk tolerance threshold; (ii) assess and report on interest rate, currency, liquidity and basic risks; (iii) consider strategies and actions to be taken to achieve the financial and business objectives established by the Company; (iv) assess the liquidity risk of the Company and the issuances, monitor periodic indicators, assess contingency plans if required and review annual stress test results, and (v) set prices to acquire loans and issue guarantees. All the decisions made by this Committee must be documented in a special book of minutes established to this effect.

Operations Committee

Comprised of the Company's CEO, Operations Director, SARO Officer and Internal Control Director. Its main function is to monitor and follow up on the operating risk management system (SARO, for the Spanish original), supervise adequate application of operating policies, issue opinions on the reports submitted by the Operating Risk Officer, and assess the development of the stages and elements of the SARO.

(102- 23) Chair of the highest governance body

Efraín Forero – CEO of Banco Davivienda

(102-24) Nominating and selecting the highest governance body

The members of the highest governance body are elected by the General Meeting of Shareholders of Titularizadora, in accordance with the majorities defined in the Company Bylaws. However, before reaching this body, the Appointments, Compensation and Ethics Committee actively participates in the evaluation of the proposed candidates to ensure that they are not subject to any disqualifications of incompatibilities and that they meet the requirements set out in the Board of Directors succession policy. Additionally, it should be noted that all Board members are independent, in accordance with the provisions of article 44 of Law 964/2005 and article 2.15 of the Good Governance Code.

(102-25) Conflicts of interest

The Good Governance Code of Titularizadora establishes specific procedures to be followed in the event any conflicts of interest should arise. The Code also includes a specific definition of a situation of conflict of interests.

(102-26) Role of highest governance body in setting purpose, values, and strategy



Every year, the Company's CEO, jointly with the Chairman of the Board of Directors, prepare a document that sets an annual work plan for the Board of Directors, which includes the main topics to be discussed at the meetings and the Company's objectives.

(102-28) Evaluation of the performance of the highest governance body

Once a year, the Board of Directors carries out an assessment of its performance as governance body, using one of the mechanisms established to this effect, which may be either a self-evaluation or an evaluation by an external advisor.

(102-32) Highest governance body's role in sustainability reporting

The Board of Directors does not participate in preparing the Company's sustainability report.

(102-34) Nature and total number of critical concerns

No critical concerns were reported that would have to be submitted to the highest governance body.

102-35 Remuneration policies / 102-36 Process for determining remuneration

Titularizadora Colombiana has an Appointments, Compensation and Ethics Committee, one of whose functions, pursuant to article 2.1.3.3. of the Good Governance Code, is to establish parameters and propose and review the remuneration of the members of the Board and Senior Management.

102-37 Stakeholders' involvement in remuneration

Stakeholders are not involved in determining remuneration policies.

(102-40) List of stakeholder groups



(102-41) Collective bargaining agreements

Titularizadora Colombiana does not have any employees covered by collective bargaining agreements.

(102-42) Identifying and selecting stakeholders

| Stakeholder | Description | Composition |
|--------------------|--|---|
| Investors | Individuals or legal entities that acquire the securities produced by securitization processes | <ul style="list-style-type: none"> ▪ Pension funds ▪ Credit establishments ▪ Insurers and capitalization companies ▪ Other institutional investors |
| Shareholder | Entities that hold equity interests in the Company. | <ul style="list-style-type: none"> ▪ Bancolombia ▪ Banco Davivienda ▪ Banco Caja Social ▪ Banco AV Villas ▪ Scotiabank Colpatría ▪ Compañía Inversora Colmena S.A. ▪ Compañía de Seguros Bolívar ▪ Compañía de Seguros de Vida Alfa |



| | | |
|----------------------------------|--|---|
| Status | Government entities, supervision, regulatory and control bodies | <ul style="list-style-type: none"> Financial Superintendence Ministry of Housing DIAN Other government entities |
| Originators and Managers | Establishments that originate and/or manage financial assets that may subject to securitization. | Bank and non-bank entities. |
| Suppliers and contractors | Individuals or organizations that provide goods or services for the operation of the Company and its businesses. | <ul style="list-style-type: none"> External consultants Other suppliers of goods Other suppliers of services |
| Securities intermediaries | Entities that engage in brokerage of financial securities and other securities intermediation activities. | <ul style="list-style-type: none"> Securities Brokerage companies Other securities intermediaries |
| Employees | People hired by the Company who have made commitments regarding quality and values | <ul style="list-style-type: none"> Employees Apprentices Interns |

102-43/102-44 Approach to stakeholder engagement / Key topics and concerns raised

| Stakeholder | Relevant Expectations and Opinions | Measurement Methodology |
|--------------------|--|---|
| Investors | <ul style="list-style-type: none"> Disclosure of timely and sufficient investment management information in the financial statements Have a representative Assurance of the characteristics of the issued securities Compliance in payments of returns | <ul style="list-style-type: none"> Satisfaction Survey (3 years) Meetings and Training Via inversionistas@titularizadora.com Annual General Meeting of TIN Securities Holders Semi-annual Teleconference on TIN Results |
| Shareholder | Fulfillment of profitability, objectives and strategies, availability of information | <ul style="list-style-type: none"> Board of Directors Strategic Planning Committees |



| | | |
|----------------------------------|--|--|
| Status | Participation in forums on policy, sector committees, sector studies, availability of information, financial statements, tax payments | Attendance at events to discuss public policy, compliance with oversight and control bodies |
| Originators and Managers | Certification and re-certification, efficient master management to assure control over securitized assets and the manager's performance | Service agreements, performance indicators, control |
| Suppliers and contractors | Formalization and full compliance with contractual terms Validation of legal requirements related to taxes and the risk of money money laundering and financing of terrorism | <ul style="list-style-type: none">▪ Renewal of contracts, evaluation of satisfaction with the business relationship▪ Via Contact us at www.titularizadora.com |
| Securities intermediaries | <ul style="list-style-type: none">▪ Efficient communications▪ Availability of information on security issuances▪ Market development and additional securities offerings▪ Training | <ul style="list-style-type: none">▪ Periodic review of placement arrangements▪ Satisfaction Survey (3 years)▪ Via inversionistas@titularizadora.com |
| Employees | Favorable workplace environment, salary recognition, personal and professional growth opportunities, promotion of innovation in positions and areas | <ul style="list-style-type: none">▪ Satisfaction survey.▪ INNOVA program▪ Employer brand |

This Sustainability Report includes inputs by i) investors, ii) shareholders iii) originators and managers, and iv) employees, as a result of the identification of material topics, on which efforts have been made to address them.

Employees

At December 2021, Titularizadora Colombiana had 70 employees distributed as follows:



| Colaboradores por tipo de Contrato | Hombres | Mujeres |
|--|-----------|-----------|
| Colaboradores con contrato directo a término Indefinido | 33 | 32 |
| Colaboradores con contrato directo a término fijo | 0 | 0 |
| Total contrato directo | 33 | 32 |
| Colaboradores con contrato de prestación de servicios | | |
| Colaboradores tercerizados | | 1 |
| Colaboradores con contrato temporal | | |
| Colaboradores con contrato de aprendizaje con el SENA | | 1 |
| Colaboradores con contrato estudiantes en práctica profesional | 3 | |

Source: Titularizadora Colombiana

Our employees are the vehicle through which we carry out the corporate strategy, offer the best services to our clients and investors, execute continuous improvement and innovation plans to maintain quality standards and reduce the margin of error involved in our everyday activities. For this reason we maintain constantly open communications channels, and we are committed to the continuous learning and training for our personnel by promoting courses and updating seminars.

ORGANIZATIONAL SUSTAINABILITY

As part of its organizational culture plan, the Company promotes productivity and work life balance under the principles of equity, inclusion and corporate social responsibility. Starting in late 2018 and during 2019 and 2021, the Company implemented the **INNOVA Program** “*where your work and contributions are made visible,*” as the base of the digital transformation to update and strengthen productivity, life-work balance, project-based management, and innovation in view of new trends. Several concepts were incorporated into Corporate Sustainability, such as creating an employer brand that differentiates us and highlights the integral wellbeing of employees, and implementing strategies related to time management and productivity.

During 2021, the objective of the cultural transformation base program was to challenge personal and institutional paradigms, take risks to make changes individually, in the positions, the areas and the company in general, to make the work and contributions visible and enter the era of digital transformation. Through training, monitoring and advisory from experts in smart methodologies and digital transformation, 8 ideas that had a direct impact on the business proposed by employees were designed, executed and implemented, as well



as 22 ideas that produced improvements in the areas and processes. During the health emergency, changes were implemented aimed at caring for the wellbeing of employees and at monitoring productivity under a model of gradual implementation of work at both the office and at home, which received ongoing satisfactory evaluations.

Innova, to contribute to the work-life balance, implemented flexible hours, one Friday per month with compressed hours, and a 30-minute reduction in the work shifts. During 2021, starting in January and under the pandemic situation, remote work was implemented maintaining high standards of productivity, connectivity and efficiency.

Additionally, strategies were implemented to enable adequate time management, and greater commitment while at the same time contributing to a social and work balance. The above, combined with the wellbeing plan, activities and benefits involving the employees' families and that contributed to mental and physical health, were strategies that undoubtedly had a positive impact on the organization's culture and to the adaptation to remote work under the pandemic conditions.

EDUCATION AND TRAINING

Annual Training Plan

In 2021, 81% of the Company's employees attended or received training, which included economic support for external training programs and seminars, congresses and short on-line and face-to-face courses on topics to update or acquire new knowledge and information. Spending in performance of the annual plan totaled

COP 43,042,120

| Tiers | Employees in 2021 | | Approximate total hours of training | |
|--|-------------------|-------|-------------------------------------|-------|
| | Men | Women | Men | Women |
| CEO | 1 | 0 | | |
| Second tier Executives (Chief Executives, Managers and Directors) | 3 | 7 | 415 | 372 |
| Third and fourth tier executives (middle managers: heads of areas, coordinators) | 2 | 1 | 210 | 185 |



| | | | | |
|---|-----------|-----------|-------------|-------------|
| Professionals and analysts | 22 | 14 | 2150 | 1933 |
| Assistants, cashiers, secretaries and other direct employees | 1 | 6 | 162 | 244 |
| TOTAL | 29 | 28 | 2937 | 2734 |

Performance Management System

100% of employees with permanent employment contracts receive quarterly follow-up evaluations and a year-end evaluation and review of the objectives for the next evaluation period. Each year, all employees must establish with their direct supervisors the objectives they will work on, and document them in the Company's performance management platform.

Investors

Our commitment with this segment in 2021 focused on providing sufficient and timely information to investors on currently outstanding issuances, to enable them to manage their investments and decide on the different issuances, particularly in view of the grace periods allowed by the Financial Superintendence due to the COVID-19 pandemic and the uncertainty this produced regarding collections of the issuances and the possible use of the liquidity guarantee. By remaining closely in touch with the market we were able to address their concerns and assess the convenience of bringing new issuances to market.

Due to the difficulties in arranging issuances during the year, investor relations focused on maintaining direct and timely communications with investors (both with their risk and portfolio management areas), placement agents and market research areas, in order to transmit the impacts and risks the pandemic situation had on the issuances, as well as the financial structures' mitigation mechanisms. During the year, information was also shared on the favorable evolution of the debt relief measures, collections and indicators of currently outstanding issuances by means of a detailed monthly report, as well as one-on-one meetings with several entities on different occasions. Additionally, workshops were held to deepen understanding on financial structuring (portfolio valuation, selection criteria, hedging mechanisms, etc.) and for the certification of originators, which help explain the issuances' good performance, despite the stress produced by the situation experienced during most of the year.

Regarding the TIN equity securities, the General Meeting of Security Holders was held, which was called as provided for in the Prospectus. The ordinary meeting was held virtually in May. At the meeting, the Master Manager of the securitization process submitted to approval by



the meeting: (i) an annual report on the state of the year, (ii) a management report on the aggregate issuance of the previous year, (iii) a corporate governance report. Additionally, a presentation to inform the Securities Holders was made on the Strategic Plan and other relevant topics related to the securitization process. Two proposals were also submitted to the General Meeting to amend the TIN Prospectus and Rules of Procedure, along with the opinion of Fitch Ratings S.A., SCV and the opinion of the Legal Representative of the Securities Holders. The proposed amendments were to adjust the Subscription Price for the issuance of subsequence tranches, and to adjust the Management Fees. The first proposal was approved, and the second was not. Two semi-annual presentations were made on the vehicle's results in February 2021 and August 2021, to explain the evolution of the main indicators and the outlook of the real estate market.

Investor relations were additionally supported by the IR Issuer Certification granted by BVC since 2013, which certifies the adoption of best practices related to the disclosure of information and investor relations. During 2021, the Securities Exchange re-certified the Company, in view of its fulfillment of the requirements for such Recognition, the most important of which are to:

- ◆ Disclose additional information to that normally required, in English and Spanish, on the website, and maintain such information updated in a timely manner.
- ◆ Periodically publish financial statements (balance sheet and income statements) and information on the issuances.
- ◆ Have a representative to field inquiries from investors, both in Spanish and English.

The adoption of best practices on information and investor relations has enabled providing our investors sufficient and timely information for their investment decisions and contributes to raising the standards of the Colombian capital market.

In sum, during 2021, investor relations focused on the sale of the issuances TIV V-2 (February), TIPS Pesos N-21 (June) and TIPS UVR U-5 (October), while the rest of the year was focused on informing the market of the evolution of the indicators, highlighting the benefits of the financial structure amidst the situation produced by the pandemic, and evaluating the convenience of bringing new issuances to market. During the last quarter, TIN investors were surveyed to explore the possibility of issuing Tranche 3, but no appetite was found given the overall status of the real estate market.

Shareholders

Our commitment to shareholders during 2021 focused on the timely delivery of the requested information, with the highest level possible of accuracy, certainty and validity for the effects of decision-making. Additionally, during the year a top priority was to manage



the results expected by shareholders in terms of financial ratios and remaining on budget, which implied that it was essential to constantly monitor the Company's financial accounts.

Titularizadora Dominicana

During 2021, we worked jointly with Titularizadora Dominicana S.A on the operational stabilization of the first mortgage loan portfolio issuance in Dominican Republic in an amount of approximately USD 20 million. The issuance's performance remained within the structure's parameters and it met the scheduled amortizations and payments. As part of the process, the re-certification procedure of management entities was initiated through Titularizadora Dominicana S.A. During the year, the structure of the second issuance was completed involving securities backed by mortgage loans of the same banks that participated in the first issuance: Banco BHD León and Asociación La Nacional de Ahorros y Préstamos. Titularizadora Colombiana continues to be a shareholder in this company.

Originators and Managers

Regarding the Originators and Managers, certain changes were made to processes aimed at improving efficiency and the use of resources. In general, improvements were made to the pre-feasibility scheme, and performance evaluations were made for both bank and non-bank managers during 2021.

(102-45) Entities included in the consolidated financial statements



Titularizadora Colombiana does not issue consolidated financial statements.

(102-46) Defining report content and topic boundaries

The general contents of the report were determined based on consultations performed in 2017 with stakeholders that were or are affected by the operations of Titularizadora Colombiana.

- ◆ Stakeholder group definition: description and composition.
- ◆ Definition of expectations and relevant opinions: measurement methodologies.
- ◆ Estimations with available information and strategies to acquire data that is not available.
- ◆ Assessment of the available information.
- ◆ Definition of material topics.
- ◆ Assignment of material topics to the areas responsible.
- ◆ Management of material topics.



- ◆ Presentation of conclusions and progress made.
- ◆ Preparation of Sustainability Reports

(102-47) List of material topics



(102-48) Restatements of information

The information included in this report was not subject to any changes due to restatements.

(102-49) Changes in reporting

There are no significant changes compared to previous period reports in terms of the list of material topics and coverage of topics.

(102-50) Reporting period

The information included in this report is for the period between January and December 2021

(102-51) Date of most recent report

May 2021, reporting on the period from January to December 2020.

(102-52) Reporting cycle

Annual



(102-53) Contact point for questions regarding the report

- ◆ Liliana Giraldo / Organizational Development and Compliance Manager / lgiraldo@titularizadora.com
- ◆ Diego Rojas / Planning Director / drojas@titularizadora.com

(102-54) Claims of reporting in accordance with the GRI Standards

"This report has been prepared in accordance with the Core option of the GRI standards."

(102-56) External assurance

The report is not subject to external assurance

(103-1) Explanation of the material topic and its Boundary

| | |
|---|---|
| Talent management | Human resources are central and a top priority for the specific operations carried out by Titularizadora Colombiana. The capacity of observe and assess the environment, which translates into training and updates, is essential in order to manage new products and market segments. |
| Purchasing and supplier management | The aim is to align purchasing and supplier management with the provisions of the ISO 9001 quality standard, to complement the standard's requirements in this regard. |
| Sustainability model | Titularizadora Colombiana has begun to include in committee meetings the sustainability topics proposed by the Banking Association. For this reason it is essential to manage an internal sustainability model that is shared and supported by the entire company, in order to implement the best practices for our operation and our industry. |

| | |
|---------------------------------|--|
| Profitability management | Fulfillment of business expectations, budgets and financial commitments acquired during the period. Assessment and monitoring of market trends to propose new business alternatives that are aligned with the requirements of the industry and the economic times. |
|---------------------------------|--|



| | |
|---|---|
| Reaffirmation of principles and values | An ongoing material topics for Titularizadora Colombiana will always be the reaffirmation of the principles and values that define our actions and our reputation in the financial sector. |
| International consolidation | One of the Company's strategic priorities is to expand in markets where securitization is in an early stage of development, and the specific plan is to venture into markets in Central America and the Caribbean. |
| Quality management | By adopting the ISO 9001 quality standards we take on the commitment to the continuous improvement of processes and operations in a manner that ensures the efficiency, effectiveness, transparency, accuracy and validity of the information for our stakeholders, which implies that quality management has become central to the sustainability of our business. |

(103-2) The management approach and its components

Talent management

| | |
|-------------------|--|
| Management | Assessment of employee wellbeing under the new normal. Improvement actions derived from employee perceptions and the demands of the environment. Wellbeing- Virtual weekly monitoring of performance by areas. |
|-------------------|--|



| | |
|---|---|
| | The goals focused on consolidating corporate sustainability through strategies to monitor and control labor productivity, reinforce the organizational culture, spaces to express work-related, personal and technological needs. |
| Purpose | Leverage the positive impacts of human resources management at the Company |
| Policies | Human resource management policies under the new normal are published, including the Biosafety Protocol and its respective updates. |
| Commitments | Organizational initiatives for the continuous improvement of the quality of the workplace environment, employee relations and salary policies. |
| Goals and targets | Annual fulfillment based on surveys and meetings with team members |
| Responsibilities | Manager of Organizational Development and Compliance – Human Resources Analyst |
| Resources | Human - Technological |
| Mechanism for claims or complaints | Ongoing communications channels with managers and supervisors. |
| Actions | Prioritized based on the availability of resources and impact on the operation |

Purchasing and supplier management

| | |
|---|--|
| Management | Supplier Selection Manual – ALCO Committee – Employees with powers – General Secretary – Technology Director |
| Purpose | Avoid or mitigate negative impacts on purchasing and supplier management |
| Policies | Purchasing Manual – ALCO Committee – Employees with powers – General Secretary – Technology Director. |
| Commitments | Compliance with standard ISO 9001 |
| Goals and targets | Annual fulfillment based on assessment by quality auditor |
| Responsibilities | Assistant to the CEO – Administrative Analyst – Project and Process Analyst |
| Resources | Human – Technological - Financial |
| Mechanism for claims or complaints | Supplier evaluation |
| Actions | Creation of commitments and monitoring |



Sustainability model

| | |
|---|---|
| Management | Sustainability Reports - Improvement campaigns |
| Purpose | Leverage the positive impacts of application of the GRI standard in the organization |
| Policies | Alignment with recognized issuers in the securities exchange and the Banking Association |
| Commitments | Compliance with GRI standard |
| Goals and targets | Annual improvements in the presentation of Sustainability Reports, adjusting information based on the development of concepts in the organization |
| Duties | Assistant to the CEO |
| Resources | Human |
| Mechanism for claims or complaints | Publication and compliance with the manual |
| Actions | Dissemination of the Sustainability Reports, continuous improvement in impact on the organization's processes, awareness-raising campaigns |

Profitability management

| | |
|---|---|
| Management | Board of Directors, monthly – Monitoring of Figures compared to budget – Executive Committee – Deal Committee – Investor Committee |
| Purpose | Leverage positive impacts and mitigate negative impacts related to the Company's strategic management |
| Policies | Board of Directors |
| Commitments | Fulfillment of agreements and commitments acquired with shareholders |
| Goals and targets | Monthly monitoring of the Company's financial results, take action to align them with the annual commitments acquired with shareholders |
| Responsibilities | Executive Committee – Office of the CEO |
| Resources | Human – Financial |
| Mechanism for claims or complaints | Board of Directors – Strategic Planning Sessions |
| Actions | Short, medium or long term, depending on the impact of the strategy to be implemented |



Reaffirmation of principles and values

| | |
|---|---|
| Management | Internal workplace rules The Company's principles and values are reinforced through internal communications campaigns. |
| Purpose | Maintain working relations and the workplace environment |
| Policies | Executive Committee – Office of the CEO – Organizational Development and Compliance Manager – Wellbeing Committee – Workplace Coexistence Committee |
| Commitments | Regulatory compliance, continuous improvement of labor relations |
| Goals and targets | Maintain labor relations, annual commitments acquired with shareholders |
| Responsibilities | Executive Committee – Office of the CEO |
| Resources | Human – Financial |
| Mechanism for claims or complaints | Transparency Channel – Wellbeing Committee – Workplace Coexistence Committee - COPASST |
| Actions | Short, medium or long term to avoid or mitigate negative impacts related to this matter |

International consolidation

| | |
|---|--|
| Management | Board of Directors, monthly – Executive Committee |
| Purpose | Leverage market opportunities in other geographies where securitization would be an attractive product for the economy |
| Policies | Executive Committee – Office of the CEO – Board of Directors |
| Commitments | Business Strategy – Pre-feasibility Assessment - Issuances |
| Goals and targets | Development of securitization in potential markets |
| Responsibilities | Executive Committee – Office of the CEO |
| Resources | Human – Financial |
| Mechanism for claims or complaints | Executive Committee |
| Actions | Medium and long term to leverage opportunities in non-developed securitization markets |



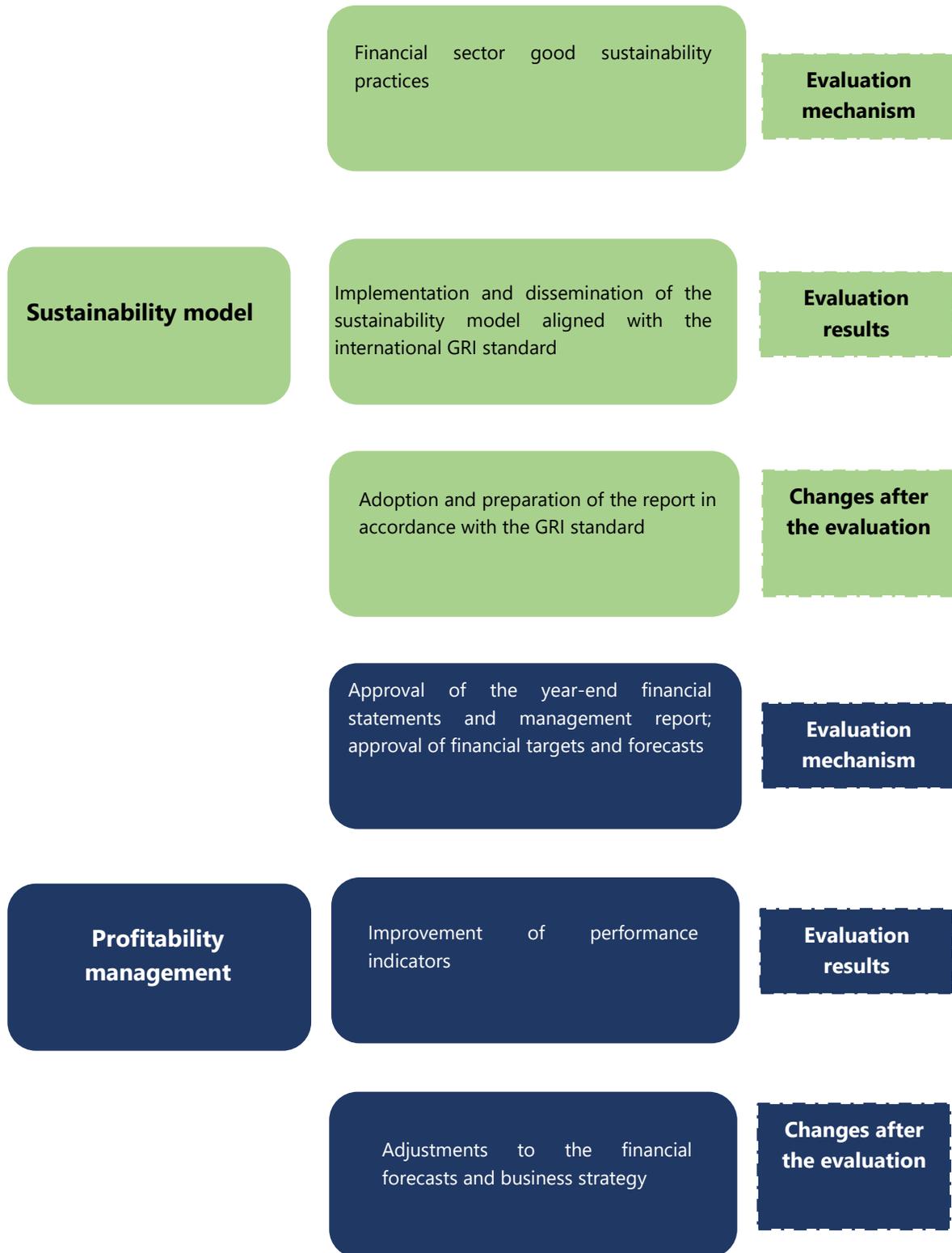
Quality management

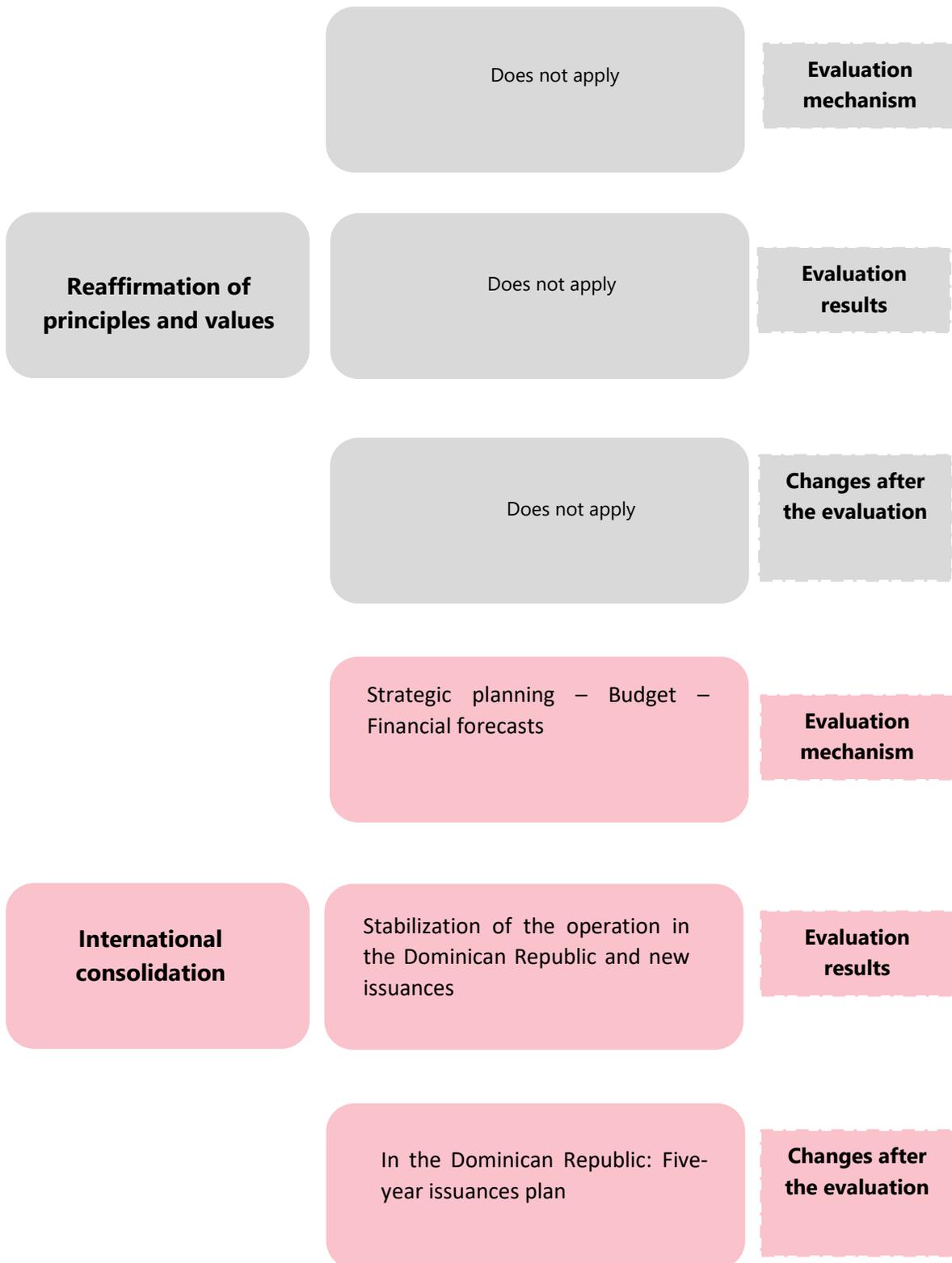
| | |
|---|---|
| Management | Quality Committee |
| Purpose | Assure compliance with the requirements of the ISO 9001:2015 standard and the organization's objectives, to satisfy the needs of stakeholders. |
| Policies | Quality and process policy |
| Commitments | Audit and continuous improvement of processes and operations – Align with the standard |
| Goals and targets | <ul style="list-style-type: none">🔥 Update and maintain compliance with the requirements of the standard and of the organization🔥 Audit and continuously improve the organization's processes and procedures🔥 Close the gaps identified by the audits of each period🔥 Maintain the ISO 9001 quality certification to satisfy the needs of our stakeholders |
| Responsibilities | Quality Committee - Office of the CEO |
| Resources | Human |
| Mechanism for claims or complaints | Quality Committee |
| Actions | <ul style="list-style-type: none">🔥 Monitor, measure, and review process management🔥 Continuously improve based on findings reported by sources for improvement🔥 Monitor fulfillment of stakeholder needs |

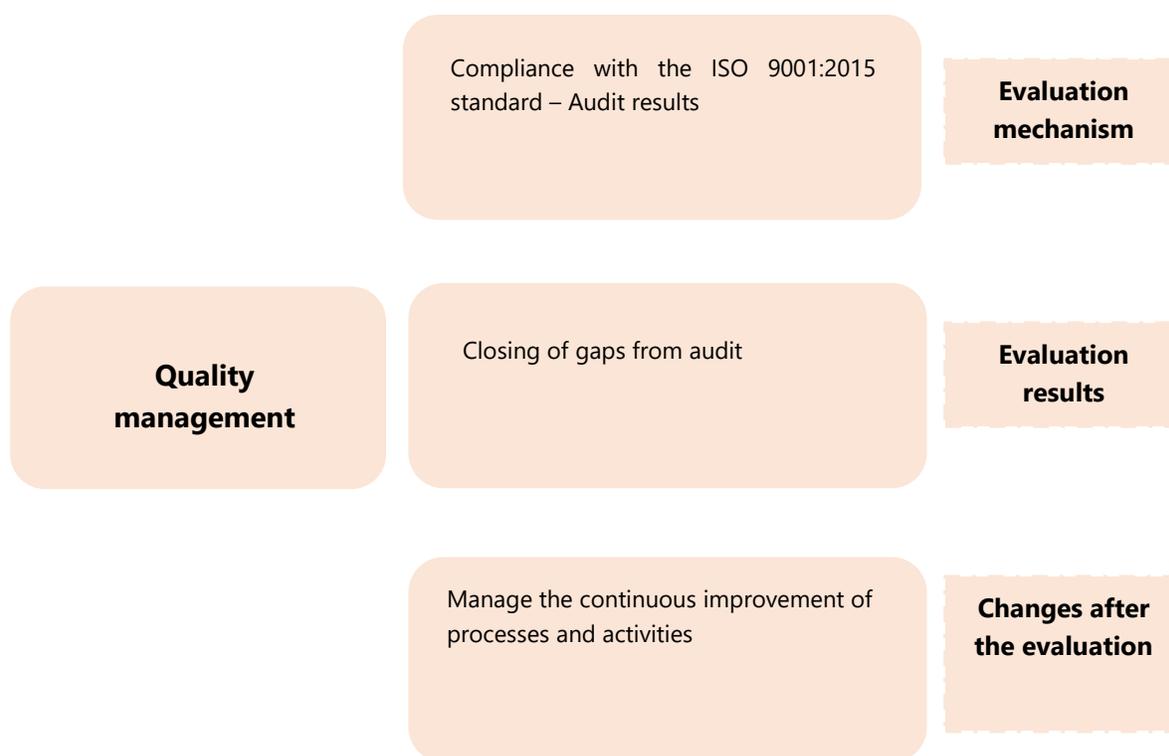


(103-3) Evaluation of the management approach

| | | |
|--------------------------------|--|-------------------------------------|
| | <p>General wellbeing survey, Transparency Channel, Wellbeing Committee, Workplace Coexistence Committee, COPASST, on-line weekly monitoring of team performance.</p> <p>The Company has a Performance Management System through an outsourced application that enables making quarterly and annual assessments of work and personal management, improvement and performance.</p> | Evaluation mechanism |
| Talent management | <p>In 2021, no major changes were reported in the measurement of human resource performance indicators.</p> | Evaluation results |
| | <p>Does not apply</p> | Changes after the evaluation |
| | <p>Annual supplier evaluation</p> | Evaluation mechanism |
| Purchasing and supplier | <p>No new events have been reported to date</p> | Evaluation results |
| | <p>Monitoring of requirements</p> | Changes after the evaluation |







ECONOMIC STANDARD

(201-1) Direct economic value generated and distributed

During 2021, the following are the figures of economic value generated and distributed by Titularizadora Colombiana (amounts in millions of pesos):

| | |
|--|------------|
| Direct Economic Value Generated (Revenues) | COP 23,710 |
| Operating costs | COP 6,349 |
| Employee benefits | COP 3,683 |
| Salaries | COP 6,964 |
| Payments to capital providers | COP 418 |
| Government payments (Taxes) | COP 2,409 |

(201-2) Financial implications and other risks and opportunities due to climate change



Titularizadora Colombiana has not detected any risk or opportunity derived from climate change. Given the nature of the Company's business, it produces no direct impacts beyond those derived from the operations of the loan originators, which manage the assets.

(201-3) Defined benefit plan obligations and other retirement plans

Titularizadora Colombiana implemented support for employees nearing retirement with personalized counseling for planning for the retirement stage once their work stage has ended.

(201-4) Financial assistance received from government

Does not apply

(202-1) Ratios of standard entry level wage by gender compared to local minimum wage

Does not apply

(202-2) Proportion of senior management hired from the local community

All operations and activities of Titularizadora Colombiana are carried out at its offices in Bogotá at Calle 72 # 7-64 , which is defined as its significant operation. 100% of the senior executives hired by the Company belong to the local community, defined as Colombian citizens who are residents in the city of Bogotá and who fulfill the required characteristics and conditions to perform the described duties of the position.

(203-1) Infrastructure investments and services supported

During 2021, Titularizadora Colombiana did not make investments in transportation networks, public utilities, social facilities, etc., that would have any positive or negative impact on its stakeholders or that transferred any value to the Company's operations.

(203-2) Significant indirect economic impacts

- ◆ Job creation
- ◆ Supply chain movement through demand for inputs from suppliers
- ◆ Enables fulfilling the originators' financing needs through investor demand for securities in the capital market
- ◆ It is reflected in greater availability of resources for originators, enabling them to offer more credit.

(204-1) Proportion of spending on local suppliers



The entity has a total of 230 local suppliers, which account for 99.9% of the payments made during 2021.

(205-1) Operations assessed for risks related to corruption

Titularizadora implemented a new Anti-corruption Corporate Policy in 2021. Within the scope of this policy and of the activities carried out by the Company during 2021, no transactions were reported that would generate risks related to corruption.

(205-2) Communication and training about anti-corruption policies and procedures

- a. During 2021, 100% of the Board of Directors reviewed and approved the Corporate Anti-corruption Policy, which establishes the applicable guidelines for the effects of maintaining the commitment adopted by the Company of zero tolerance for corruption.
- b. During 2021, the General Secretary of Titularizadora Colombiana provided training on corporate governance and the anti-corruption policy, with attendance by 50 Company employees, which represents a significant level of attendance within Titularizadora. A video on the main aspects of the Policy was also developed, which is broadcast through screens available at the Company to this effect, and the Policy was published on the website of Titularizadora to make it permanently available.

(205-3) Confirmed incidents of corruption and actions taken

During 2021, no corruption cases were reported at the Company.

(206-1) Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

During 2021, Titularizadora Colombiana was not involved in any legal actions related to anti-competitive behavior and monopoly practices.

(207-1) Approach to tax

Titularizadora Colombiana prepares and submits its tax returns in accordance with applicable national and municipal regulations. No tax strategy has been defined or approved by any corporate governance body.

(207-2) Tax governance, control, and risk management

Does not apply



(207-3) Stakeholder engagement and management of concerns related to tax

Does not apply

(207-4) Country-by-country reporting

Titularizadora Colombiana does not present consolidated financial statements. For all effects, its tax jurisdiction is in Colombia and the tax authority is Administración de Impuestos y Aduanas Nacionales (DIAN).

(301-1) Materials used by weight or volume

Titularizadora Colombiana uses sheets of paper to print various documents. However, under the new policies of the "Think Green" program, it has been decided to distribute information through electronic channels by means of repositories made available by the Company.

(301-2) Recycled input materials used

The Company's percentage of recycled input materials in 2021 was calculated based on the amount of paper produced, of which 24% was recycled, mainly derived from management of active and inactive files generated by the Company.

The central strategy adopted is the policy of zero paper, which consists in the digitalization of documents and their subsequent conservation in electronic repositories made available to this effect by the Company.

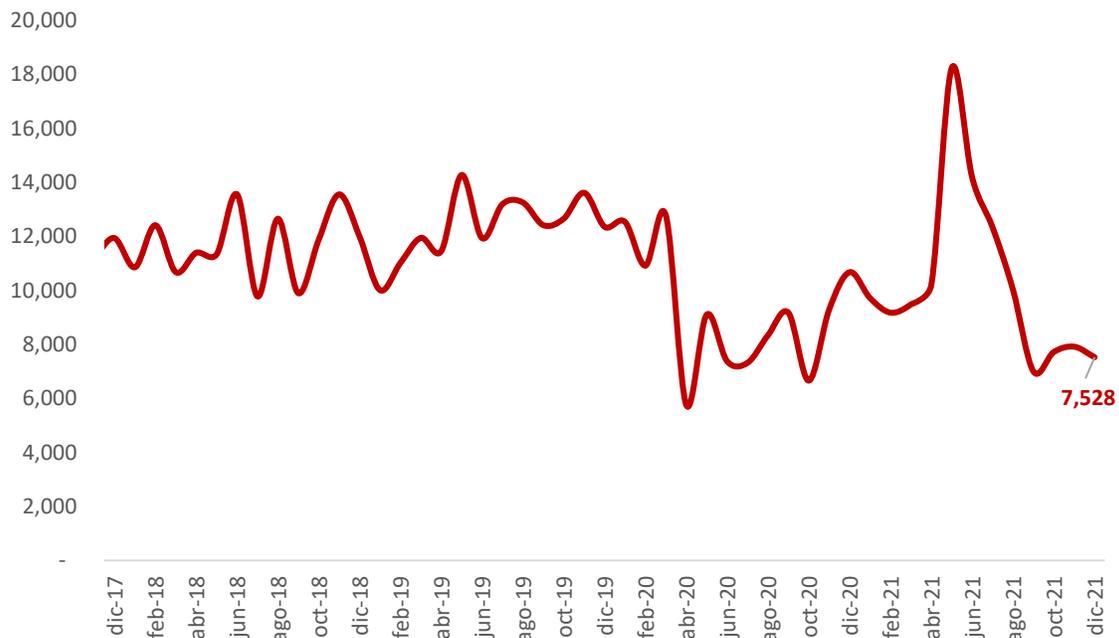
(301-3) Reclaimed products and their packaging materials

Does not apply

(302-1) Energy consumption within the organization



Evolution of energy consumption at Titularizadora Colombiana



Source: Titularizadora Colombiana

Electricity consumption measured in Kwh at year-end 2021 totaled 123,554 Kwh.

(302-2) Energy consumption outside of the organization

Does not apply

(302-3) Energy intensity

Does not apply

(302-4) Reduction of energy consumption

Policies have been implemented through the "Think Green" policy, including the installation of electricity-saving lighting and maximizing use of natural sunlight in common areas and offices.

(302-5) Reductions in energy requirements of products and services

Energy consumption in 2020 totaled 109,965 kwh, compared to 123,554 KWH in 2021. The increase is explained by the return of employees to the Company's physical facilities.



(303-1) Interactions with water as a shared resource

Titularizadora Colombiana uses water at the Company's facilities, where no industrial or production processes are carried out that would imply any additional use. There is no water recycling or reuse.

(303-2) Management of water discharge-related impacts

Does not apply

(303-3) Water withdrawal

Does not apply

(303-4) Water discharge

Does not apply

(303-5) Water consumption

The water consumed at the offices of Titularizadora Colombiana is recorded based on the amounts reported by the city water utility company.

| Month | ML |
|--------------|--------------|
| Jan-21 | 0.021 |
| Feb-21 | 0.005 |
| Mar-21 | 0 |
| Apr-21 | 0 |
| May-21 | 0 |
| Jun-21 | 0 |
| Jul-21 | 0 |
| Aug-21 | 0.001 |
| Sep-21 | 0.004 |
| Oct-21 | 0.035 |
| Nov-21 | 0.014 |
| Dec-21 | 0.024 |
| Total | 0.104 |

(304-1) Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas

Titularizadora Colombiana is not located in any protected area.

(304-2) Significant impacts of activities, products, and services on biodiversity



Given the location of the facilities of Titularizadora Colombia and its business activities, it has no significant impact on biodiversity.

(304-3) Habitats protected or restored

Titularizadora Colombia has not joined associations or third parties for habitat protection or restoration initiatives.

(304-4) IUCN Red List species and national conservation list species with habitats in areas affected by operations

Does not apply

(305-1) Direct GHG emissions

Given the nature of its business, Titularizadora Colombiana does not produce direct GHG emissions.

(305-2) Energy indirect GHG emissions

Does not apply

(305-3) Other indirect GHG emissions

Does not apply

(305-4) GHG emissions intensity

Does not apply

(305-5) Reduction of GHG emissions

Does not apply

(305-6) Emissions of ozone-depleting substances

Does not apply

(305-7) Nitrogen oxides, sulfur oxides, and other significant air emissions

Does not apply

(306-1) Water discharge by quality and destination

Does not apply

(306-2) Waste by type and disposal method

Following the gradual return to work at the corporate offices, work resumed on collecting and disposal of the waste generated. All waste is non-hazardous, and the following quantities were reported by disposal method:



| Disposal method | Weight (Kg) |
|-----------------|-------------|
| Reused | 8 |
| Recycled | 60 |
| On-site storage | 100 |

(306-3) Significant spills

Does not apply

(306-4) Transport of hazardous waste

Does not apply

(306-5) Water bodies affected by water discharges and/or runoff

Does not apply

(307-1) Non-compliance with environmental laws and regulations

In 2021, Titarizadora Colombiana was not subject to any fines or penalties due to non-compliance with environmental laws and regulations.

(308-1) New suppliers that were screened using environmental criteria

Starting in 2018, Titarizadora Colombiana included in its supplier registration form the statement on Corporate Sustainability, which discloses the following key information to identify patterns that are aligned with the requirements of the GRI standard regarding suppliers:

- ◆ The organization has implemented an occupational safety and health system.
- ◆ The organization makes the required payments related to social security and salaries and does not employ minors.
- ◆ The organization includes a percentage of employees who are female heads of household or vulnerable populations (people with disabilities, displaced persons, among others).
- ◆ The organization organizes recycling and energy and water savings campaigns.

(308-2) Negative environmental impacts in the supply chain and actions taken

At year-end 2021, Titarizadora Colombiana has established environmental criteria for supplier selection or management of the associated risks, as reported in the registration forms, which are updated annually to follow up on our suppliers' status. The established requirements include monitoring that suppliers have environmental sustainability, emissions reduction and reuse and recycling programs.

(401-1) New employee hires and employee turnover



Left company:

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|--------------|----------|-----------|----------|----------|----------|-----------|
| Men | 3 | 11 | 3 | 6 | 2 | 8 |
| Women | 1 | 11 | 2 | 0 | 2 | 5 |
| Total | 4 | 22 | 5 | 6 | 4 | 13 |

New hires:

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|--------------|----------|-----------|----------|----------|----------|----------|
| Men | 5 | 6 | 3 | 2 | 6 | 7 |
| Women | 1 | 5 | 0 | 6 | 1 | 2 |
| Total | 6 | 11 | 3 | 8 | 7 | 9 |

Turnover: $((\text{New hires} + \text{left})/2) * 100$

| | 2019 | 2020 | 2021 |
|--------------|------------|-----------|------------|
| Men | 11% | 10% | 7% |
| Women | 9% | 5% | 3% |
| Total | 10% | 8% | 11% |

(401-2) Benefits provided to full-time employees that are not provided to temporary or part-time employees

The employee benefits for permanent employees include i) life insurance, ii) payment of 100% of sick leave by payroll, iii) allowance for gyms and iv) allowance for membership in the employee cooperative.

(401-3) Parental leave

During 2021, only one employee had paternity leave. The Company abides by and supports the terms established by law regarding parental leaves.

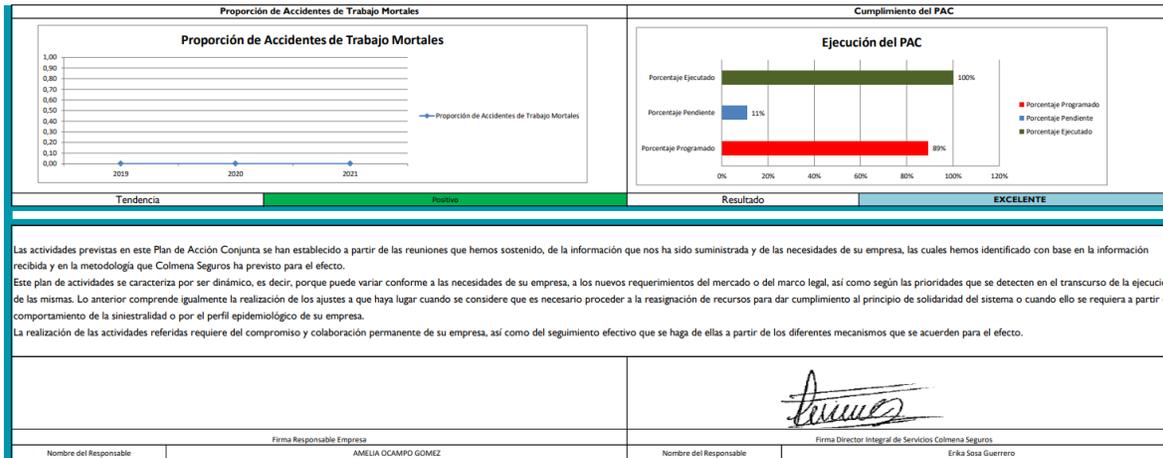
(402-1) Minimum notice periods regarding operational changes

It should be noted that there are no trade unions at Titularizadora Colombiana. However, corporate-level decisions and those that affect the employment contracts are communicated to employees one month in advance.

(403-1) Occupational health and safety management system



Titularizadora Colombiana has implemented an Occupational Health and Safety Management System (OHSMS) since December 2015. The system is supported by an organizational structure. The self-assessment score measured by the occupational risks insurer (ARL, for the Spanish original) indicates 99% compliance with the minimum standards established by Resolution 0312/2019 of the Labor Ministry.



(403-2) Hazard identification, risk assessment, and incident investigation

The OHSMS established that any time an employee identifies a workplace hazard, it must be reported to any member of the COPASST, which includes the Human Resources employee responsible for managing incidents, as set out in the OHSMS Manual.

| Plan de Acción Conjunta PAC - Colmena Seguros | | | | | | | | | |
|---|-------------------------------|---|---|----------|--------------------------------------|---------------------|----------|----------|--|
| I. Información General | | | | | | | | | |
| Fecha Elaboración PAC: | 8 Febrero 2022 | | | | | | | | |
| Empresa: | titularizadora colombiana s a | | | | Nit: | 830089530 | | | |
| Contacto empresa: | AMELIA OCAMPO GOMEZ | | | | Contrato: | 1162042 | | | |
| Cargo Contacto: | Analista Recursos Humanos | | | | Dis: | Erika Sosa Guerrero | | | |
| Email: | aocampo@titularizadora.com | | | | Regional: | Centro | | | |
| 2. Análisis de Riesgos | | | | | | | | | |
| Riesgo Potencial | Riesgo Expresado | | | | Objetivo del SGSST | | | | |
| | POUT ALTO (H4) | ALTO (H) | MEDIO (H) | BAJA (H) | | 2019 | 2020 | 2021 | |
| MORTAL O CATASTRÓFICO (H) | BIOLOGICO Virus - Covid 19 | | | | N° promedio de trabajadores | 69 | 71 | 70 | Implementación del SGSST acorde con los estándares mínimos del SGSST |
| MUY GRAVE (H3) | | | BIOMECANICO Posturas inadecuadas y prolongadas Movimientos repetitivo | | N° Accidentes de Trabajo | 0 | 0 | 0 | |
| GRAVE (H2) | | PSICOSOCIAL Características de la organización del trabajo | | | Días de Incapacidad Cargados | 0 | 0 | 0 | |
| LEVE (L) | | | | | N° Accidentes de Trabajo Mortales | 0 | 0 | 0 | |
| | | | | | N° Enfermedades Laborales Totales | 0 | 0 | 0 | 3. Evaluación del SGSST |
| | | | | | Frecuencia de Accidentalidad | 0,00 | 0,00 | 0,00 | |
| | | | | | Severidad de Accidentalidad | 0,00 | 0,00 | 0,00 | |
| | | | | | Prevalencia de la Enfermedad Laboral | 0,00 | 0,00 | 0,00 | Puntaje: |
| | | | | | Proporción de Accidentes de Traba | #iDIV/0! | #iDIV/0! | #iDIV/0! | 99,00% |
| | | | | | | | | | Valoración |
| | | | | | | | | | ACEPTABLE |
| Observaciones | | | | | | | | | |

(403-3) Occupational health services

General Management Report of the System

| Activity | Result |
|---|-----------------|
| Fulfillment of the activities included in the OHSMS Annual Plan | 89% fulfillment |



| | | |
|---|---|---|
| Occupational Safety and Health Management System | Indicator of fulfillment of the OHSMS Program certified by the ARL | 99% compliance |
| | OHSMS external audit and certification | 81 documents reviewed and approved Updated policies |
| | Work-related accidents and diseases | None reported |
| | Weekly and/or monthly dissemination of information on prevention, topics of interest, emergencies, etc. | THE ENTIRE COMPANY, 12 months, three messages per day |
| | Upgrades to offices and workstations arising from COPASST inspections | On-line monitoring of workstation conditions and connectivity under remote work |
| | Emergency prevention campaign at home and at the office | THE ENTIRE COMPANY |
| | OHSMS training | 5 COPASST member 12 brigade members |
| | Continuity of the active breaks and Bone-Muscle Care Schools (Epidemiological Surveillance Program) | 70 employees |
| | Acquisition of new items to supplement fixed and movable emergency first aid kits | 12 first aid kits equipped |
| | Information for the entire company on work-related incidents and accidents | THE ENTIRE COMPANY |
| | Reinforcement of emergency signage | ALL PHYSICAL AREAS |
| | Biosafety and biological risk prevention campaigns | THE ENTIRE COMPANY |
| | Training on biological risk prevention, mental health, environmental responsibility, hearing care, healthy lifestyles | THE ENTIRE COMPANY |
| | Implementation of protection and biosafety measures: ozonization, disinfection system | THE ENTIRE COMPANY |



2021 Campaigns / Environmental Strategy



The Think Green: “Leave your footprint on the planet” (*Piensa Verde “Deja tu huella en el planeta”*) campaign included:

Strengthening of the program aimed at environmental sustainability: “Think Green: Committed to Sustainability,” through different internal communications campaigns to apply both at home and at the office.





Waste campaign





Paper use campaign

Divulgación de información estadística de consumo de papel en la compañía

Divulgación estadística de impresiones por área

Adquisición de impresora a color sin cartuchos, usa sistema Ecotank el cual es más económico y amigable con el medio ambiente. Se cancelan las impresiones libres a color



Campaign on single-use and other products

Se suspende la compra y uso de vasos plásticos, cubiertos y platos

Se suspenden las toallas de papel desechables y se adquieren secadores ahorradores de última tecnología

El no uso de las canecas por puesto para disminuir el uso de bolsas plásticas

Entrega recipiente personalizado para el consumo de bebidas en la oficina



Se adquiere en alquiler máquina dispensadora de café



Energy savings campaign



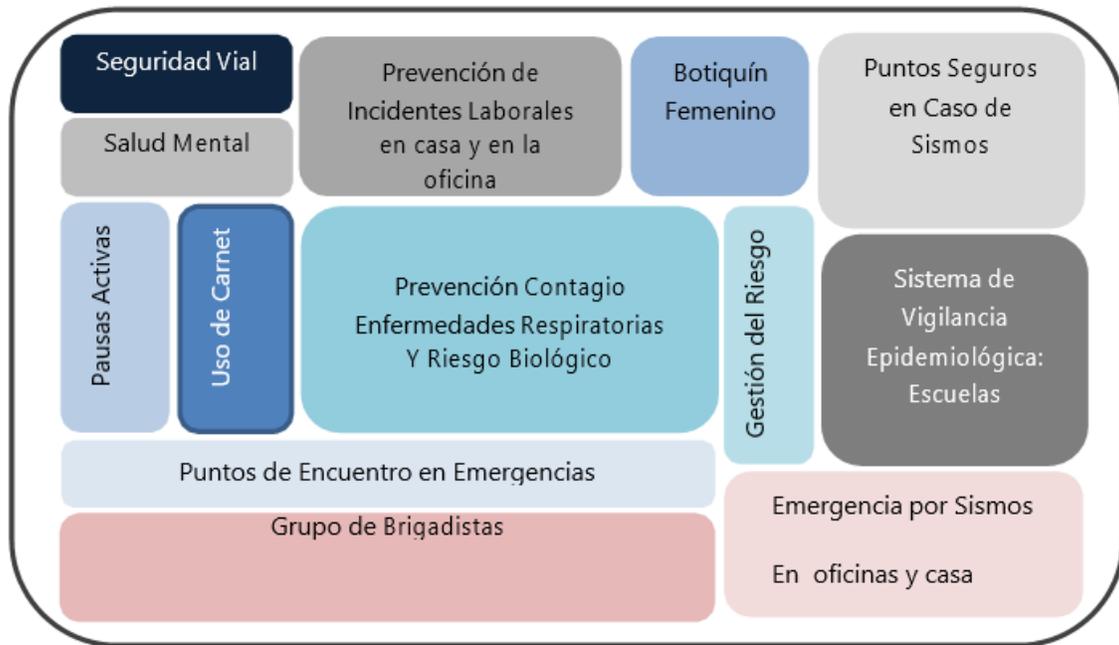
Water savings campaign



(403-4) Worker participation, consultation, and communication on occupational health and safety



Internal Communications



The internal communications plan included: daily messages on COVID-19 prevention and information, mental health, healthy lifestyles, ergonomics, family support and working from home, and two daily messages on active breaks, emergencies, environmental sustainability, epidemiological surveillance system, occupational risks, care for working at home.

The COPASST (joint employer-employee occupational risk management committee, for the Spanish original) held monthly meetings and played an active role during 2021 in executing the Support Plan to follow up on employees, in compliance with the established protocols.





(403-5) Worker training on occupational health and safety

The following were the employee training sessions provided through COLMENA during 2021:

| 4. Seguimiento al Plan de Acción Conjunta | | | | | | | | | | | | |
|---|---|---|---|-------------------|------------------|----------------|------------------------------------|------------------------|--------|------------------------|-----------------|--|
| N° Acc. | Línea | Programa | Actividad | Horas Programadas | Horas Ejecutadas | % Cumplimiento | Proveedor | Fecha Programada | Ciudad | Estado de la actividad | Responsable | Observaciones |
| 1275149 | Modelo Gire | Modelo Gire | Asesoría COVID19 | 4 | 4 | 100% | APP Yuri Bautista | 11/08/2021 | Bogotá | Ejecutada | Colmena Seguros | Inspección de protocolos de bioseguridad |
| 1253570 | Línea Acompañamiento Legal y de Gestión | Programa SGST-ILIO | Asesoría en sistema de gestión en seguridad y salud en el trabajo SG SST | 4 | 4 | 100% | APP Yuri Bautista | 25/05/2021 | Bogotá | Ejecutada | Colmena Seguros | Asesoría y acompañamiento autoevaluación Res. 0312 en plataforma Colmena Gestión |
| 1279005 | Línea Prevención y Gestión del ATEL | Programa de factores de riesgos psicosocial | Asesoría para programas específicos de intervención psicosocial | 8 | 8 | 100% | compañía rso s.a. | 5/4/2021 | Bogotá | Ejecutada | Colmena Seguros | Asesoría en el Programa de salud Mental, para el 04 de mayo, definir hora con el cliente |
| 1287484 | Línea Prevención y Gestión del ATEL | Programa de factores de riesgos psicosocial | Asesoría y capacitación grupal para intervención factores Intralaborales | 2 | 2 | 100% | harmonyce sas | 5/18/2021 - 5/21/2021 | Bogotá | Ejecutada | Colmena Seguros | Capacitación en dos sesiones cada una de una hora en Manejo del tiempo: uso creativo y hábitos para aprovechar el tiempo laboral en casa, primera sesión el 20 de mayo, segunda sesión 21 de mayo, definir hora con el cliente |
| 1292668 | Línea Prevención y Gestión del ATEL | Programa de factores de riesgos psicosocial | Asesoría y capacitación grupal para intervención factores Intralaborales | 2 | 2 | 100% | harmonyce sas | 7/2/2021 | Bogotá | Ejecutada | Colmena Seguros | Capacitación en manejo del estrés para el 2 de julio, definir hora con el cliente |
| 1332311 | Línea Prevención y Gestión del ATEL | Programa de factores de riesgos psicosocial | Asesoría y capacitación grupal para intervención factores Intralaborales | 2 | 2 | 100% | compañía rso s.a. | 11/11/2021 | Bogotá | Ejecutada | Colmena Seguros | Taller de desconexión laboral, 2 grupos c/u de 1 hora, para el 11 de noviembre a las 10:00 am |
| 1329955 | Línea Prevención y Gestión del ATEL | Programa de factores de riesgos psicosocial | Asesoría y capacitación grupal intervención factores Extralaborales | 2 | 2 | 100% | psicólogos & profesionales p&p sas | 9/10/2021 - 9/16/2021 | Bogotá | Ejecutada | Colmena Seguros | Capacitación afrontamiento y temor al contagio, retorno laboral, para el viernes 10 de septiembre a las 10:00 am |
| 1332308 | Línea Prevención y Gestión del ATEL | Programa de factores de riesgos psicosocial | Asesoría y capacitación grupal intervención factores Extralaborales | 2 | 2 | 100% | harmonyce sas | 10/15/2021 | Bogotá | Ejecutada | Colmena Seguros | Taller de salud mental, 2 grupos c/u de 1 hora, para el 15 de octubre a las 10:00 am |
| 1354549 | Línea Prevención y Gestión del ATEL | Programa de factores de riesgos psicosocial | Asesoría y capacitación grupal intervención factores Extralaborales | 2 | 2 | 100% | harmonyce sas | 11/24/2021 | Bogotá | Ejecutada | Colmena Seguros | Charla sobre estilos de vida saludable: obesidad, para el 24 de noviembre definir hora con el cliente |
| 1292672 | Línea Prevención y Gestión del ATEL | Programa Estilo de Vida Saludable | Capacitación en medicina preventiva y del trabajo | 2 | 2 | 100% | zonamedica mtr s.a.s. | 8/4/2021 | Bogotá | Ejecutada | Colmena Seguros | Taller en conservación auditiva y autocuidado, para el 04 de agosto definir hora con el cliente |
| 1332355 | Línea de Emergencias | Modelo Integral de Gestión en Emergencias | Asesoría en la Gestión del Riesgo y plan de acción en el Modelo Integral de Emergencias | 4 | 4 | 100% | sic colombia hseq s.a.s. | 9/13/2021 - 10/30/2021 | Bogotá | Ejecutada | Colmena Seguros | Diagnóstico de evacuación y señalización |
| 1292682 | Línea de Emergencias | Modelo Integral de Gestión en Emergencias | Capacitación en Primeros Auxilios | 2 | 2 | 100% | john osvaldo unibio rojas | 9/3/2021 | Bogotá | Ejecutada | Colmena Seguros | Capacitación en primeros auxilios para el 03 de septiembre, definir hora con el cliente |
| Total | | | | 36 | 36 | | | | | | | |

| 5. Gestión del Conocimiento | | | | | | | | |
|-----------------------------|---------------|-------|---|------------|--------------|------------|---------------|-------------------|
| Formar Presencial Aplicable | | | Formar Virtual Aplicado | | | | | |
| Tema | Participantes | Fecha | Curso | Fecha | N° Inscritos | % Aprobado | % No Aprobado | Resultado |
| | | | ADAPTACIÓN LABORAL DESPUÉS DEL AISLAMIENTO: GUÍA PSICOSOCIAL PARA RETORNO A LA VIDA LABORAL | 16/04/2021 | 1 | 0% | 100% | |
| | | | CONEXIÓN SEGURA EN PROTOCOLETAS | 27/01/2021 | 1 | 100% | 0% | |
| | | | CURSO 50 HORAS - CAPACITACIÓN VIRTUAL EN EL SISTEMA DE GESTIÓN DE LA SEGURIDAD Y LA SALUD EN EL TRABAJO | 24/03/2021 | 2 | 0% | 100% | |
| | | | WEBINAR - PRIMEROS AUXILIOS BÁSICOS | 3/06/2021 | 3 | | | Finalizado - 100% |
| | | | WEBINAR - PROGRAMA PROMOCIÓN DE LA SALUD MENTAL - ARMÓNICAMENTE | 6/08/2021 | 1 | | | Finalizado - 100% |

(403-6) Promotion of worker health

Healthy lifestyle campaigns, encourage to avoid carbonated beverages, annual occupational medical checkups, including laboratory tests and appointment with a physician specialized in ergonomics. The Company's policy is to offer employees time off for medical appointments.

(403-7) Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

Does not apply



(403-8) Workers covered by an occupational health and safety management system

100% of employees are covered by the occupational health and safety management system.

(403-9) Work-related injuries

No work-related accidents were reported in 2021.

(403-10) Work-related ill health

No work-related illnesses were reported in 2021.

Sick leaves and absenteeism

Sick leave: the OHSMS indicator is in terms of days of sick leave: During 2021, 321 days of sick leave were reported, equivalent to 2,568 hours of work lost.

(404-1) Average hours of training per year per employee

Total hours of training in 2021:

| Level | Men | Women |
|--|-------------|--------------|
| CEO | | |
| Chief Executives, Managers and Directors | 415 | 372 |
| Heads of Area, Coordinators | 210 | 185 |
| Professionals and Analysts | 2150 | 1933 |
| Assistants, Cashiers, Secretaries, Others | 162 | 244 |
| Total | 2937 | 2734 |

(404-2) Programs for upgrading employee skills and transition assistance programs

The programs implemented and assistance provided to enhance employee skills are aimed at providing training to meet the employees' training requirements and needs. Support is also provided to plan for pensions and retirement.

(404-3) Percentage of employees receiving regular performance and career development reviews

100% of employees with permanent employment contracts receive quarterly follow-up evaluations and a year-end evaluation and review of the objectives for the next evaluation



period. Each year, all employees must establish with their direct supervisors the objectives they will work on, and document them in the Company's performance management platform.

(405-1) Diversity of governance bodies and employees

Employees

| Age range | Women | Men |
|---------------------------|--------------|------------|
| 0 to 30 years old | 5 (15.6%) | 9 (27.3%) |
| 31 to 50 years old | 20 (62.5%) | 18 (54.5%) |
| Over 50 years old | 7 (21.8%) | 6 (18.7%) |
| Total | 32 | 33 |

(405-2) Ratio of basic salary and remuneration of women to men

There is no difference in the ratio for assigning base salaries. An established salary policy is in place. There are no differences by sex for establishing employee remuneration, fair and equal participation by employees is promoted, personnel selection decisions are made based on the employees' capabilities and skills.

Talent Attraction, Selection and Retention Policies

- ◆ Remuneration policy: Maintain employee salaries at the market median. The established policy is communicated to employees.
- ◆ Promote training and professional growth (Training Plan). An education and training program is in place.
- ◆ Selection policy: High-level recruitment sources; compliance with the established procedure.

Talent Committee

Titularizadora Colombiana currently has no talent committee. The Company participates in the Asobancaria Talent Committee.

Workplace Wellbeing and Quality Policies

Wellbeing policies are in place:

- ◆ Based on the Company's financial situation and clear reasonableness criteria, a budget allocation may be made for such plans.
- ◆ The plans must be communicated to all the personnel.



- ◆ The programs must in no way affect the quality and timeliness of the employees' work.
- ◆ All personnel must be encouraged to express their interests and the solutions they believe would best fulfill them.
- ◆ All Company areas must be represented in the preparation of the plans and programs.
- ◆ The plans and programs must be aimed at all Company employees.
- ◆ Decisions that benefit COLLECTIVE interests will prepare over individual interests.
- ◆ Encourage coexistence in a healthy workplace environment:
 - ◆ Implement plans that contribute to integral development and improved life quality (work, personal, family).
 - ◆ Promote knowledge of the arts and the various cultural expressions.
 - ◆ Promote a healthy lifestyle through prevention and occupational health programs and practicing sports and recreational activities

Employee Development

Two employees were promoted during 2021, and two employees' salaries were raised to match market levels.

(406-1) Incidents of discrimination and corrective actions taken

In 2021, no cases of discrimination were reported. Titularizadora has a coexistence committee through which all situations related to labor harassment are channeled, and which uses best practice to solve conflicts of this type.

(407-1) Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

Does not apply

(408-1) Operations and suppliers at significant risk for incidents of child labor

Does not apply

(409-1) Operations and suppliers at significant risk for incidents of forced or compulsory labor

Does not apply

(410-1) Security personnel trained in human rights policies or procedures

Does not apply



(411-1) Incidents of violations involving rights of indigenous peoples

No cases of violations of rights of indigenous peoples were reported.

(412-1) Operations that have been subject to human rights reviews or impact assessments / (412-2) Employee training on human rights policies or procedures / (412-3) Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening

During 2021, the Company did not sign any agreements or investment contracts with human rights clauses.

(413-1) Operations with local community engagement, impact assessments, and development programs

Does not apply

(413-2) Operations with significant actual and potential negative impacts on local communities

Does not apply

(414-1) New suppliers that were screened using social criteria

In 2021, business relations were initiated with 41 new suppliers that were screened using social criteria in 2020.

(414-2) Negative social impacts in the supply chain and actions taken

NA

(415-1) Political contributions

During 2021, Titularizadora Colombiana did not make any contributions to political parties and/or political representatives.

(416-1) Assessment of the health and safety impacts of product and service categories

Given the nature of the business, no assessment was made in connection with the health effects of the services provided.

(416-2) Incidents of non-compliance concerning the health and safety impacts of products and services



No cases of this type have been reported.

(417-1) Requirements for product and service information and labeling

The services offered by Titularizadora Colombiana have no direct impact on the environment, and consequently no information is provided to customers in this regard.

(417-2) Incidents of non-compliance concerning product and service information and labeling

During 2021, no cases of non-compliance were reported concerning product and service information that would give rise to fines or penalties.

(417-3) Incidents of non-compliance concerning marketing communications

During 2021, no cases of non-compliance were reported concerning advertising, promotion and sponsorship regulations that would give rise to fines or penalties.

(418-1) Substantiated complaints concerning breaches of customer privacy and losses of customer data

During 2021, no claims were received related to breach of customer privacy.

(419-1) Non-compliance with laws and regulations in the social and economic area

During 2021, no fines or non-financial penalties were reported due to non-compliance with laws and regulations in the social and economic area.