

Company and Sector Performance

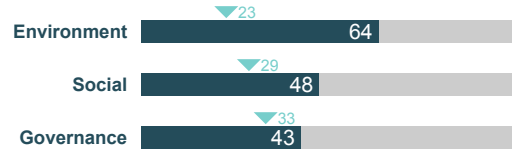
Company performance Sector average performance Sector performance

ESG OVERALL SCORE

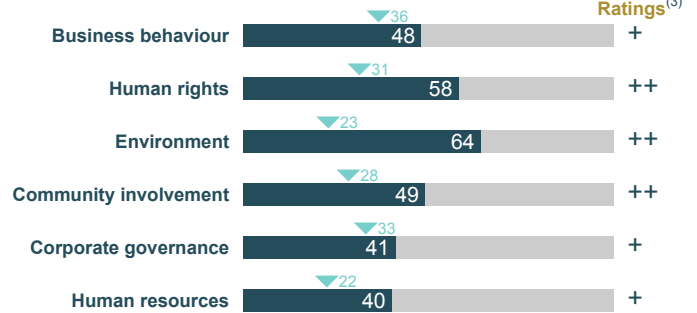


| | |
|----------------------------------|----------------|
| Information rate | 75% |
| sector average | 53% |
| Cooperation level ⁽²⁾ | Not responsive |
| High severity controversies | No |
| Rank in Sector | 4/95 |
| Rank in Region | 18/890 |
| Rank in Universe | 289/4453 |

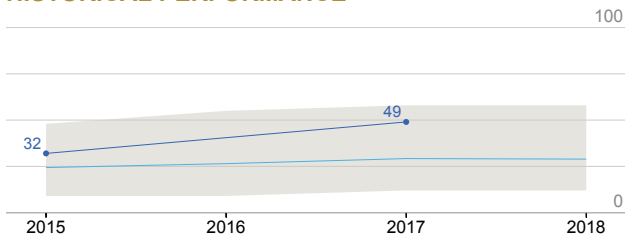
ESG PERFORMANCE (/100)



6 DOMAINS PERFORMANCE (/100)



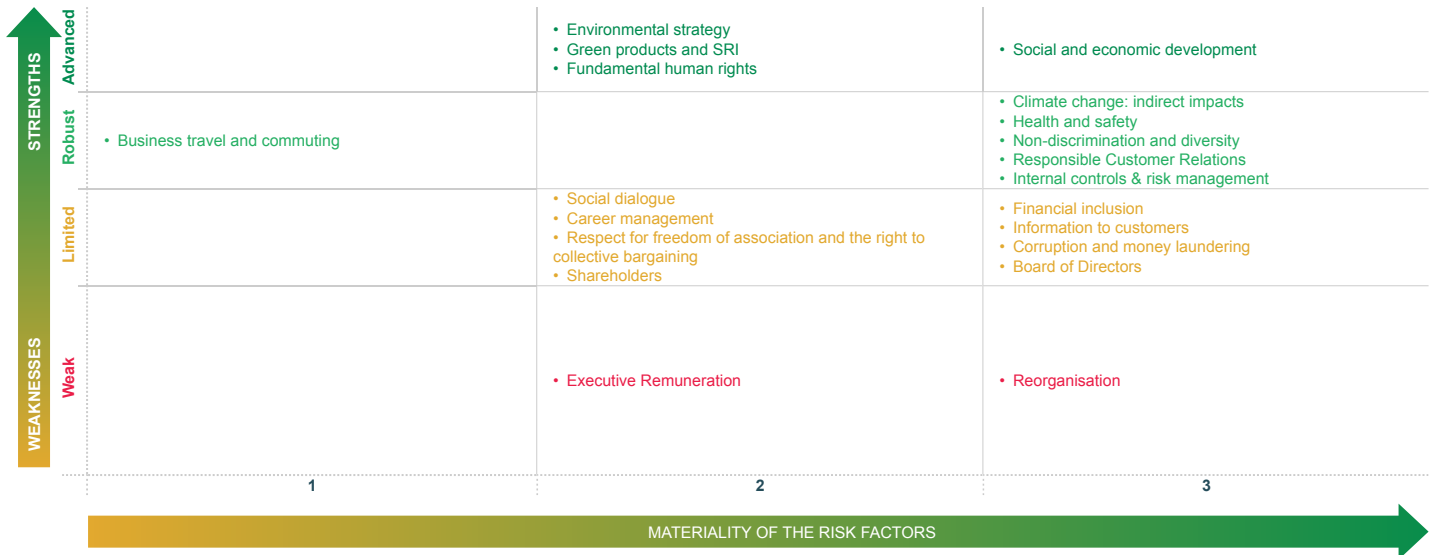
HISTORICAL PERFORMANCE



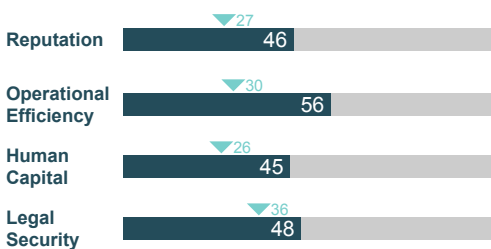
Company inclusion in Vigeo Eiris indices⁽⁴⁾: No

Management of risks and opportunities

MATERIALITY & PERFORMANCE MATRIX



RISK MITIGATION INDEX (/100)



ANALYST FOCUS

Analyst Focus is not available at this time

Carbon Footprint and Energy Transition*

"The Carbon Footprint & Energy Transition research provides an assessment of a company's carbon footprint combined with the strategy to manage risks and opportunities related to the transition to a low carbon economy. NI (No Info) is used to indicate that the information is not available."

CARBON FOOTPRINT



| SCALE | EMISSIONS (T CO2 EQ) | CATEGORIES |
|-------|------------------------------|-------------|
| A | <100 000 | Moderate |
| B | >= 100 000 and <1 000 000 | Significant |
| C | >= 1 000 000 and <10 000 000 | High |
| D | >= 10 000 000 | Intense |

ENERGY TRANSITION SCORE



| ENERGY TRANSITION SCORE | CATEGORIES |
|-------------------------|------------|
| 60-100 | Advanced |
| 50-59 | Robust |
| 30-49 | Limited |
| 0-29 | Weak |

Goods and services contributing to sustainable development*

"Sustainable Goods & Services research provides a positive screening on companies to identify business activities devoted to sustainable solutions."



| INVOLVEMENT | CATEGORIES |
|-------------|-------------|
| >=50% | Major |
| 20-49% | Significant |
| 0-19% | Minor |
| 0% | None |

Involvement in controversial activities*

"The Controversial Activities research provides screening on companies to identify involvement in business activities that are subject to philosophical or moral beliefs."

Involvement in controversial activities: Not available in this version

Screened Areas:

- Alcohol
- Animal welfare
- Chemicals of concern
- Civilian firearms
- Fossil fuels
- Gambling
- Genetic engineering
- High interest rate lending
- Military
- Nuclear power
- Pornography
- Reproductive medicine
- Tobacco

For more information please contact us at customer.service@vigeo-eiris.com

(1) Performance level: weak (0-29/100), limited (30-49/100), robust (50-59/100), advanced (60-100/100)
 (2) Cooperation level on a 4-level scale: proactive, responsive, partially responsive, not responsive
 (3) Ratings outline companies' benchmarked domain performance within a sector, on a 5-level scale: "-", "=", "+", "+", "+"
 (4) Indices: based on the most recent indices at the date of publication. More details on vigeo-eiris.com.

Company performance in all the Sustainability Drivers

| | | Weight | Overall score 49/100 | Trend | Score | Leadership | Implementation | Results |
|---|--------|--------|---------------------------------------------------------------------------|-------|-------|------------|----------------|---------|
| | | | Environment | ↗ | 64 | 82 | 59 | 30 |
| E | ENV2.2 | 3 | Climate change: indirect impacts | → | 52 | 76 | 55 | 24 |
| E | ENV1.1 | 2 | Environmental strategy | ↗ | 77 | 100 | 53 | N/A |
| E | ENV1.3 | 2 | Green products and SRI | ↗ | 71 | 83 | 66 | 65 |
| E | ENV2.7 | 1 | Business travel and commuting | ↗ | 56 | 65 | 65 | 39 |
| | | | Human Resources | ↗ | 40 | 34 | 28 | 57 |
| S | HRS2.3 | 3 | Reorganisation | → | 22 | 0 | 0 | 65 |
| S | HRS3.2 | 3 | Health and safety | ↗ | 51 | 55 | 37 | 60 |
| S | HRS1.1 | 2 | Social dialogue | ↗ | 40 | 37 | 19 | 65 |
| S | HRS2.4 | 2 | Career management | ↗ | 48 | 48 | 66 | 30 |
| | | | Human Rights | ↗ | 58 | 69 | 41 | 65 |
| S | HRT2.4 | 3 | Non-discrimination and diversity | ↗ | 59 | 65 | 48 | 65 |
| S | HRT1.1 | 2 | Fundamental human rights | ↗ | 72 | 79 | 72 | 65 |
| S | HRT2.1 | 2 | Respect for freedom of association and the right to collective bargaining | ↗ | 43 | 65 | 0 | 65 |
| | | | Community Involvement | ↗ | 49 | 45 | 44 | 57 |
| S | CIN1.1 | 3 | Social and economic development | ↗ | 63 | 69 | 55 | 65 |
| S | CIN2.1 | 3 | Financial inclusion | → | 34 | 21 | 32 | 49 |
| | | | Business Behaviour (C&S) | ↗ | 48 | 56 | 30 | 59 |
| S | C&S1.2 | 3 | Information to customers | → | 42 | 39 | 21 | 65 |
| S | C&S1.3 | 3 | Responsible Customer Relations | ↗ | 54 | 65 | 39 | 59 |
| G | C&S3.1 | 3 | Corruption and money laundering | ↗ | 49 | 65 | 30 | 53 |
| | | | Corporate Governance | → | 41 | 37 | 31 | 54 |
| G | CGV1.1 | 3 | Board of Directors | ↘ | 35 | 29 | 26 | 51 |
| G | CGV2.1 | 3 | Internal controls & risk management | ↗ | 59 | 53 | 44 | 79 |
| G | CGV3.1 | 2 | Shareholders | → | 41 | 40 | 18 | 65 |
| G | CGV4.1 | 2 | Executive Remuneration | → | 21 | 20 | 32 | 11 |

■ Weak (0-29/100)
 ■ Limited (30-49/100)
 ■ Robust (50-59/100)
 ■ Advanced (60-100/100)



Involvement in allegations



Involvement in allegations with evidence of corrective measures

Benchmark
Position versus sector peers

| Position versus sector peers | | Environment | Human resources | Human rights | Community involvement | Business behaviour (C&S) | Corporate governance | Overall Score |
|------------------------------|----------------------------------------------|-------------|-----------------|--------------|-----------------------|--------------------------|----------------------|---------------|
| MA0000010811 | BMCI | ++ | ++ | ++ | ++ | ++ | ++ | 58 |
| MA0000011835 | BMCE Bank of Africa | ++ | ++ | ++ | ++ | ++ | + | 56 |
| BRSANBCDAM13 | Banco Santander Brasil | ++ | ++ | ++ | ++ | ++ | ++ | 54 |
| COB07PA00086 | BanColombia | ++ | + | ++ | ++ | + | + | 49 |
| TW0002892007 | First Financial Holdings | + | + | ++ | ++ | ++ | + | 49 |
| TRAGARAN91N1 | Garanti Bank | ++ | + | ++ | + | + | = | 49 |
| ZAE000004875 | Nedbank Group | ++ | + | + | ++ | = | ++ | 48 |
| TW0002891009 | CTBC Financial Holding | + | ++ | + | = | + | + | 45 |
| INE528G01019 | Yes Bank | ++ | + | + | ++ | + | + | 43 |
| ZAE000109815 | Standard Bank Group (South Africa) | + | = | + | + | = | + | 42 |
| MXP370711014 | Grupo Financiero Banorte | + | + | + | + | = | = | 40 |
| KR7055550008 | Shinhan Financial Group | = | + | + | + | + | + | 40 |
| ZAE000174124 | Barclays Africa Group | = | = | + | + | = | + | 38 |
| CLP321331116 | Banco de Credito e Inversiones | ++ | + | = | + | = | + | 37 |
| ID1000096605 | Bank Negara Indonesia Persero | = | + | + | = | = | = | 36 |
| KR7105560007 | KB Financial Group | = | = | = | - | + | + | 36 |
| KR7138930003 | BNK Financial Group | + | + | + | = | ++ | = | 35 |
| MX01GE0E0004 | Genera | = | = | + | ++ | ++ | = | 35 |
| TH0015010R16 | Siam Commercial Bank | + | + | = | = | = | = | 35 |
| AEA000201011 | Abu Dhabi Commercial Bank | = | + | = | = | ++ | + | 34 |
| MA0000011926 | Attijariwafa Bank | + | + | ++ | + | = | - | 34 |
| MYL1155OO000 | Malayan Banking | = | = | = | = | + | + | 34 |
| TRAAKBNK91N6 | Akbank | = | = | = | = | + | = | 33 |
| EGS60121C018 | Commercial International Bank (Egypt) S.A.E. | = | - | = | = | + | = | 33 |
| KR7086790003 | Hana Financial Group | = | = | = | + | = | + | 33 |
| CLP0939W1081 | Banco de Chile | - | + | = | + | + | = | 32 |
| ID1000095003 | Bank Mandiri | = | = | + | = | + | = | 32 |
| PLBIG0000016 | Bank Millennium | = | + | + | = | = | = | 32 |
| MYL1023OO000 | CIMB Group Holdings | - | + | = | - | = | = | 32 |
| BRITSAACNPR7 | Itausa | + | = | = | = | + | - | 32 |
| TRAICTR91N2 | Turkiye Is Bankasi | = | = | = | + | = | = | 32 |
| ID1000118201 | Bank Rakyat Indonesia | = | = | = | = | = | = | 31 |

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| Position versus sector peers | | Environment | Human resources | Human rights | Community involvement | Business behaviour (C&S) | Corporate governance | Overall Score |
|------------------------------|--------------------------------------|-------------|-----------------|--------------|-----------------------|--------------------------|----------------------|---------------|
| TRETHAL00019 | Turkiye Halk Bankasi | = | = | + | - | - | + | 31 |
| PEP116001004 | BBVA BANCO CONTINENTAL | + | + | + | + | = | - | 30 |
| KR7139130009 | DGB Financial Group | + | = | = | + | = | = | 30 |
| CL0002262351 | Itau CorpBanca | + | = | + | - | = | + | 30 |
| TW0002887007 | Taishin Financial Holdings | + | + | = | = | - | = | 30 |
| US46630Q2021 | VTB Bank | = | - | - | - | = | + | 30 |
| ID1000094204 | Bank Danamon | + | = | = | = | = | = | 29 |
| TH0023010000 | Bank of Ayudhya | = | = | = | - | = | + | 29 |
| TW0002883006 | China Development Financial Holdings | = | = | = | - | - | = | 29 |
| INE040A01026 | HDFC Bank | - | = | = | = | = | ++ | 29 |
| INE238A01034 | Axis Bank | = | = | = | = | = | + | 28 |
| PHY0967S1694 | Bank of the Philippine Islands | = | = | = | + | = | = | 28 |
| INE001A01036 | Housing Development Finance | - | = | = | = | = | = | 28 |
| INE090A01021 | ICICI Bank | - | = | - | = | = | = | 28 |
| MYL1295OO004 | Public Bank | - | - | = | - | - | + | 28 |
| ID1000109507 | Bank Central Asia | = | - | = | = | - | - | 27 |
| PLBH00000012 | Bank Handlowy | = | - | = | + | = | = | 27 |
| PLPEKAO00016 | Bank Pekao | - | - | - | - | + | = | 27 |
| HU0000061726 | OTP Bank | - | - | = | = | = | = | 27 |
| TRAYKBNK91N6 | Yapi ve Kredi Bankasi | = | = | = | = | + | - | 27 |
| INE028A01039 | Bank of Baroda | = | - | = | + | = | = | 26 |
| PLBZ00000044 | BANK ZACHODNI WBK | = | = | = | - | = | + | 26 |
| MA0000011884 | BCP | = | = | = | = | + | - | 26 |
| CNE100001QW3 | China Everbright Bank | + | - | = | = | - | = | 26 |
| TW0002884004 | E.Sun Financial Holdings | = | = | = | = | = | = | 26 |
| INE115A01026 | LIC Housing Finance | - | - | - | + | + | + | 26 |
| TREVKFB00019 | Turkiye Vakiflar Bankasi | = | = | + | - | = | = | 26 |
| TH0001010014 | Bangkok Bank | = | - | - | = | = | - | 25 |
| MA0000010381 | CDM | = | - | = | = | = | - | 25 |
| TH0150010R11 | Krung Thai Bank | - | = | = | - | - | + | 25 |
| PLPKO0000016 | PKO Bank Polski | - | = | - | = | - | = | 25 |
| BRBBHIACNOR9 | Banco BBM | = | = | = | - | + | -- | 24 |
| MYL1066OO009 | RHB Bank | - | - | - | -- | + | + | 24 |
| TW0002890001 | SinoPac Financial Holdings | = | - | - | - | - | = | 24 |
| MYL2488OO004 | Alliance Financial Group | - | = | - | = | = | = | 23 |

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| Position versus sector peers | | Environment | Human resources | Human rights | Community involvement | Business behaviour (C&S) | Corporate governance | Overall Score |
|------------------------------|---------------------------------------|-------------|-----------------|--------------|-----------------------|--------------------------|----------------------|---------------|
| BRBRSRACNPB4 | Banco Do Estado do Rio Grande do Sul | - | = | = | - | = | = | 23 |
| USP07785AF85 | Banco BMG | - | - | = | - | = | = | 23 |
| CNE1000002M1 | China Merchants Bank | - | - | - | = | - | = | 23 |
| BMG2519Y1084 | Credicorp | - | - | - | - | = | - | 23 |
| MYL5819OO007 | Hong Leong Bank | - | - | = | - | - | + | 23 |
| PLBRE0000012 | MBank | - | = | - | = | = | - | 23 |
| BRBSAFACNOR4 | Banco Safra | = | = | = | - | - | -- | 22 |
| MYL1082OO006 | Hong Leong Financial Group | - | - | = | - | - | = | 22 |
| TH0068010R15 | TMB BANK | = | = | - | - | - | = | 22 |
| PLALIOR00045 | ALIOR BANK | - | = | = | - | - | - | 20 |
| BRDAYCACNOR5 | Banco Daycoval | - | - | = | - | - | - | 20 |
| PHY077751022 | Banco de Oro Unibank | = | - | - | - | - | - | 20 |
| TW0002801008 | Chang Hwa Commercial Bank | - | - | - | - | = | = | 20 |
| CNE100000X44 | Chongqing Rural Commercial Bank | - | - | - | - | - | = | 20 |
| TW0002886009 | Mega Financial Holding | - | - | - | -- | - | - | 20 |
| PHY6028G1361 | Metropolitan Bank & Trust | - | = | - | - | - | = | 20 |
| XS0300998779 | Russian Agricultural Bank | - | - | - | = | - | -- | 20 |
| TW0002834009 | Taiwan Business Bank | = | - | - | = | - | -- | 19 |
| TW0005880009 | Taiwan Cooperative Financial Holdings | = | - | - | - | - | - | 19 |
| KR7000030007 | Woori Bank | - | - | - | + | -- | -- | 19 |
| MA0000011454 | CIH | - | - | - | = | - | - | 18 |
| KR7024110009 | Industrial Bank of Korea | - | = | = | = | - | -- | 18 |
| QA000A0M8VM3 | Masraf Al Rayan | - | - | - | -- | -- | = | 18 |
| BRABCBACNPR4 | Banco ABC Brasil | - | - | - | -- | - | = | 17 |
| XS0906946008 | Gazprombank | - | - | - | - | -- | - | 16 |
| TW0002880002 | Hua Nan Financial Holdings | - | -- | -- | -- | - | - | 16 |
| MXP370641013 | Grupo Financiero Inbursa | - | - | - | - | -- | -- | 13 |
| AED000201015 | Dubai Islamic Bank | - | - | - | -- | -- | -- | 12 |

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General information

Bancolombia SA provides financial products and services to a diversified individual and corporate customer. The

Company was founded on January 24, 1945 and is headquartered in Medellin, Colombia.

Selected financial data

| Key data | Revenues | EBIT | Employees |
|----------|--------------|--------------|-----------|
| 2016 | COP 4,767bn | COP 2,170bn | 17,508 |
| 2015 | COP 10,989bn | COP 2.462 bn | 34,390 |
| 2014 | COP 9,321bn | COP 2.169 bn | 18,867 |
| 2013 | COP 5,009bn | COP 1,456 bn | 18,463 |
| 2012 | COP 4,767bn | COP 2,170bn | 17,508 |

| Main shareholders | 2017 |
|--------------------------------------------|--------|
| Grupo Inversiones Suramericana | 46.46% |
| Fondo de Pensiones Obligatorias Porvenir | 12.1% |
| Fondo de Pensiones Obligatorias Protección | 4.77% |

| Geographical Breakdown | Turnover 2016 | Employees |
|------------------------|---------------|-----------|
| Colombia | 90% | N/A |
| Other | 10% | N/A |

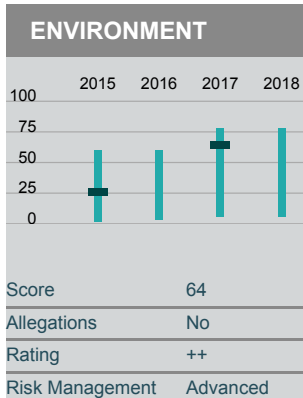
| Main economic segment | Turnover 2016 |
|-----------------------|---------------|
| Banking | 86.7% |
| Leasing | 10.65% |
| Other | 2.65% |

Selected ESG Indicators

| | 2016 | 2014 |
|--------------------------------------------------------------------------------|---------|---------|
| Non-executive Board member(s) responsible for CSR issues | No | No |
| Executive remuneration linked to CSR performance | Yes | No Info |
| Percentage of independent Board members | 28.6 | 42.8 |
| Percentage of women on Board | 0 | 0 |
| Percentage of women in Executive team | 55 | 59 |
| Percentage of women in workforce | 62 | 63 |
| Percentage of employees covered by collective agreements on working conditions | 63 | N/A |
| 3 year trend for safety at work | → | → |
| Involvement in armament | No | No |
| Transparency on payment of tax | Partial | Partial |

CSR performance per domain

■ Sector performance
■ Company performance
Rating : min- / max ++

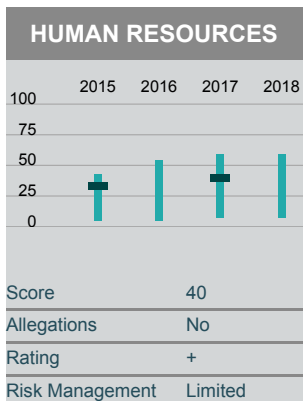


Key issues

The integration of environmental factors in the allocation of resources to companies and individuals is relevant to influence them towards more environmentally responsible behaviours (ENV1.3). With the Paris agreement, climate change remains the focus of the debate (ENV2.2). That is why the scope of the analysis has been enlarged to cover banks' efforts to reduce their own carbon footprint, their financed emissions, and to support the energy transition. Financial institutions can also address their direct impacts by minimizing the CO2 consumption of their own operations (ENV2.2 and ENV2.7) and by implementing an Environmental Management System (ENV1.1).

Company performance

- The Company's performance in the Environmental domain is advanced in absolute terms which is an improvement compared to the previous review.
- BanColombia commits to all its responsibilities in terms of environmental protection and also put in place significant resources to environmental management. In addition, the Bank is proactive in raising the awareness on sensitive environmental matters and allocates strategies for responsible investment decisions. Moreover, BanColombia processes to systematically consider climate risks in its financing activities. Finally, the Company has set relevant measures to minimise environmental impact in personal transport.
- Overall, the Company ranks far above its peers.

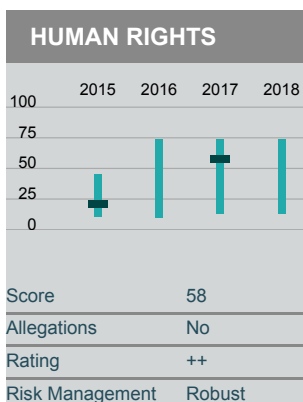


Key issues

Cost reduction strategies, including job cuts, heavily affected the financial industry since after the financial crisis. This calls for banks to responsibly manage restructurings (HRS 2.3) to mitigate social consequences for employees, but also to safeguard their human capital base. The unstable external and internal environment, characterised by an increased work pressure, lack of job security and an increased demand for flexibility, requires an effective health & safety policy (HRS3.2) to deal properly with many stress factors.

Company performance

- The Company's performance in the Human Resources domain is limited in absolute terms which is an improvement compared to the previous review.
- Bancolombia counts with individual development plans for its employees, including a performance evaluations. In addition, the Company seeks to promote negotiation and agreements with the labour unions. However, there is an lack of reporting on the way the bank mitigates impacts of reorganisations on its employees. Finally, measures to improve the health and safety and to reduce the stress at work has been allocated.
- Overall, the Company ranks above its peers.



Key issues

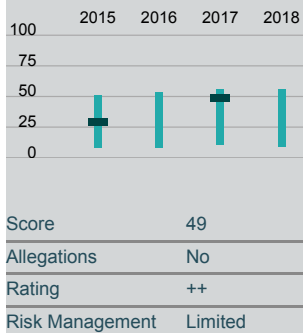
The financial industry is characterized by a high-qualified workforce, with a high proportion of men in managerial positions and significant gender pay disparities. As a consequence, non-discrimination (HRT2.4) is a relevant issue for the sector. Financial companies may also be exposed to human rights abuses through their financing and investment activities (HRT 1.1).

Company performance

- The Company's performance in the Human Rights domain is robust in absolute terms which is an improvement compared to the previous review.
- BanColombia is committed protect, respect and remedy human rights in society. Moreover, the Company adopted comprehensive measures to support its commitment. Also, the Company discloses some measures to back up the Group's commitment to prevent discrimination, and the share of women in management positions shows a stable trend on the 3-year period. Even though the Company has a commitment to respect for freedom of association, there is a lack of information on this matter.
- Overall, the Company ranks far above its peers.

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COMMUNITY INVOLVEMENT



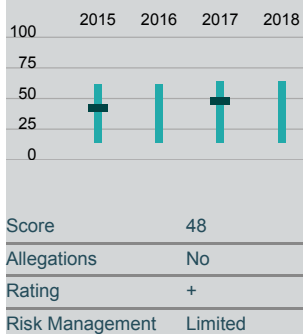
Key issues

The main role of banks is to enhance the social and economic development by supporting the real economy (CIN 1.1). As tax revenues are key for sustainable development, companies have the responsibility to ensure fairness and transparency in their tax strategies (CIN 1.1). Financial inclusion and the support of clients in financial distress are also a key responsibility for banks (CIN 2.1), especially in the actual context of slowdown of global economies.

Company performance

- The Company's performance in the Community Involvement domain is limited, close to robust, in absolute terms which is an improvement compared to the previous review.
- Company's commitment addresses all relevant responsibilities in terms of social and economic development, and also BanColombia put in place measures to back up these issues. To promote the accessibility of banking services, BanColombia has allocated significant measures such as access to basic banking services, to credit, and financial education which are applied throughout the Company. Finally, the Company reports significantly on taxes paid.
- Overall, the Company ranks far above its peers.

BUSINESS BEHAVIOUR (C&S)



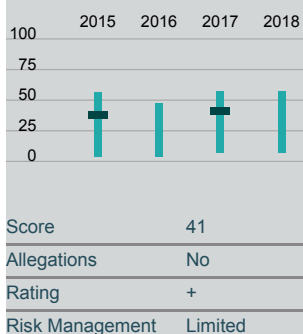
Key issues

Banks' responsibility is to provide comprehensive and suitable advice to customers on their products and associated risks (C&S 1.2), as well as to ensure fair relations with them. Cybersecurity and the protection of clients' information are emerging as key issues for a responsible management of clients and therefore recently included in the dedicated driver (C&S 1.3). Companies' effort to create an internal culture of responsible business conduct is also crucial in a sector that has been heavily affected by controversies related to unethical behaviour (C&S3.1).

Company performance

- The Company's performance in the Business Behavior domain is limited in absolute terms which is an improvement compared to the previous review.
- BanColombia is committed to enhance customer satisfaction and listen to complaints, putting in place measures to ensure the compliance of the commitment in these issues. Only few measures are reported to support the bank's commitment related to information to customers. Finally, BanColombia is committed to prevent business ethics risks and money laundering, and it puts in place relevant measures to combat these risks.
- Overall, the Company ranks above its peers.

CORPORATE GOVERNANCE



Key issues

Sound corporate governance is required to oversee a company's strategic direction, including the CSR strategy. Directors are notably evaluated on their level of diversity and experience with operational, financial, and CSR topics (CGV1.1). The audit and internal controls system is examined regarding the efficiency and reach of its risk management (CGV2.1). Executive remuneration is assessed for transparency and alignment with the interests of company's shareholders and other stakeholders (CGV4.1).

Company performance

- The Company's performance in the Corporate Governance domain is limited in absolute terms which is consistent compared to the previous review.
- The Board is 28.6% independent, which is less than the recommended level; some of its Board members has demonstrated expertise on CSR issues. The Audit Committee has a limited role in overseeing internal and external controls; however, Bancolombias has a sound risk management. Moreover, the Company presented to its shareholders and investors its ESG strategy. Finally, executives' remuneration is the major area for improvement in this domain.
- Overall, the Company ranks above its peers.

CSR performance per criterion

Detailed Analysis

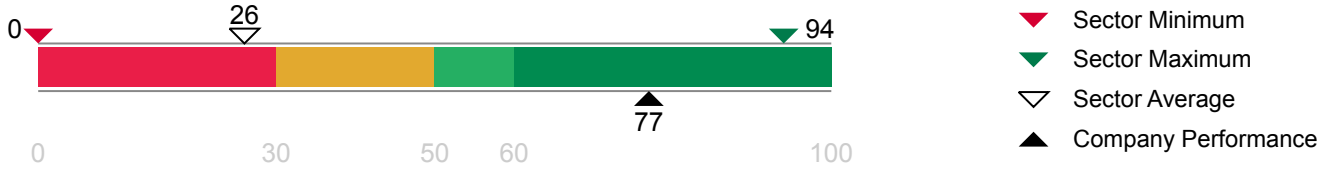
| | |
|----------------------------------------------------------------------------------|-----------|
| Environment | 11 |
| ENV1.1 Environmental strategy | 11 |
| ENV1.3 Development of green products and services | 13 |
| ENV2.2 Minimising indirect environmental impacts from energy use | 15 |
| ENV2.7 Management of environmental impacts from transportation | 17 |
| Human resources | 19 |
| HRS1.1 Promotion of labour relations | 19 |
| HRS2.3 Responsible management of restructurings | 21 |
| HRS2.4 Career management and promotion of employability | 22 |
| HRS3.2 Improvement of health and safety conditions | 24 |
| Human rights | 26 |
| HRT1.1 Respect for human rights standards and prevention of violations | 26 |
| HRT2.1 Respect for freedom of association and the right to collective bargaining | 28 |
| HRT2.4 Non-discrimination | 30 |
| Community involvement | 32 |
| CIN1.1 Promotion of the social and economic development | 32 |
| CIN2.1 Societal impacts of the company's products / services | 35 |
| Business behaviour (C&S) | 37 |
| C&S1.2 Information to customers | 37 |
| C&S1.3 Responsible Customer Relations | 39 |
| C&S3.1 Prevention of corruption and money laundering | 41 |
| Corporate governance | 44 |
| CGV1.1 Board of Directors | 44 |
| CGV2.1 Audit & Internal Controls | 46 |
| CGV3.1 Shareholders | 48 |
| CGV4.1 Executive Remuneration | 50 |

Environment

Score: 64

ENV1.1 Environmental strategy

(score: 77, weight: 2)



Visibility of the commitment to environmental issues

The Company has issued a formalised commitment environmental protection, and sets specific targets for the corporate eco-efficiency in the sites of Colombia, Panama and Guatemala in Energy efficiency, water consumption, paper used and kilometers traveled. In addition, Bancolombia is a signatory of the Global Compact and communicates on this principle.

The company commits to all its responsibilities in terms of environmental protection:

- Measuring and monitoring direct environmental impacts
- Minimising environmental impacts from transportation
- Introducing environmental factors in the credit risk assessment
- Incorporate ESG considerations in investments strategies
- Reducing indirect impact on climate change, through credit/ lending activity
- Integration of environmental factors in the supply chain

Relevance of environmental strategy

- *Measuring and monitoring direct environmental impacts: the Company is committed to develop eco-efficiency programmes and evaluate the environmental impact of the projects developed internally.*
- *Minimising environmental impacts from transportation: the Company is committed and set targets for 2020 to reduce the kilometers traveled in Colombia, Panama and El Salvador.*
- *Introducing environmental factors in the credit risk assessment: through its Environmental and Social Risk Policy, Bancolombia establish its parameter to assess risks on financing projects.*
- *Incorporate ESG considerations in investments strategies: through the Responsible Investment Policy, the Company is committed to incorporate ESG matters in the analysis processes and in the investment decision-making process.*
- *Reducing indirect impact on climate change, through lending activity: the bank address the Climate Change from its indirects impacts through financing and investment in order to implement mitigation and adaptation actions to face the adverse effects of climate change.*
- *Integration of environmental factors in the supply chain: Bancolombia is committed to assess the generated environmental impacts by its suppliers throughout the provision of their services and/or the characteristics of the goods delivered to the Group.*

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, there is a dedicated structure responsible for this issue, and other stakeholders are involved.

The Environmental Management Area is responsible of maintaining a coherent and updated policy, promote strategies, actions and measures of corporate sustainability, combining matters of economic development and environmental responsibility. Moreover, to reach the Company's sustainable Businesses strategy, Bancolombia got the partnership of NGO's and companies such as WWF, MGM, BanCO2, LatinSIF, Fundación Natura, among other.

The company has allocated significant resources to environmental management.

- Environmental manual specifying procedures and responsibilities
- Internal audits that assess the effectiveness of the EMS
- Management review of the EMS (at Executive Level)
- Environmental performance measured against targets
- External verification of reporting on environmental performance

Means allocated to environmental management system

- *Environmental manual specifying procedures and responsibilities: the Policies on Environmental Management, Climate Change, Responsible Investment and Environmental and Social Risk Assessment Policies establish the procedures and responsibilities on the environmental issues.*
 - *Environmental performance measured against targets: the Company assess its Eco-efficiency performance in energy efficiency, water consumed, paper used and kilometers traveled, comparing them with its respective targets.*
 - *External verification of reporting on environmental performance: the Corporate Responsibility Report is reviewed by a third-independent party (Deloitte).*

Means allocated to employees environmental engagement

The company has allocated comprehensive employees environmental engagement initiatives, including employees' incentives.

- Awareness raising
- Training on ways to reduce their environmental impact in their daily operations
- "Green teams" or environmental dedicated task forces
- Remuneration based on environmental performance (bonuses and awards)

- *Training on ways to reduce their environmental impact in their daily operations: The employees receive internal training programmes, seeking to create awareness and train employees on environmental matters, according to their functions*
 - *Remuneration based on environmental performance (bonuses and awards): There is a corporate goal measured by the company's performance in the Dow Jones Sustainability Index, and one of its components is guided towards climate change issues.*

Coverage of certified environmental management systems

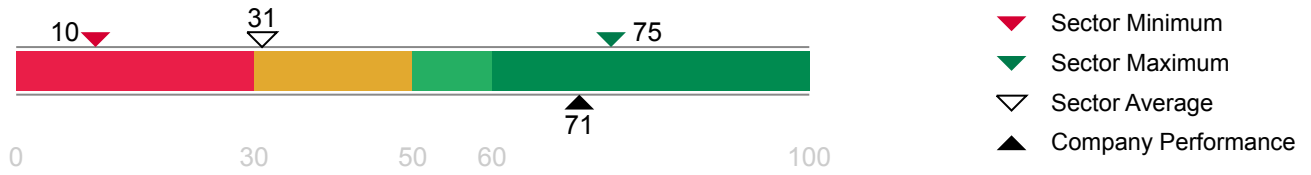
Information obtained from company and public sources regarding the share of the sites/offices that have a certified environmental management system is insufficient.

| | |
|-------------------|------------|
| Leadership | 100 |
| Visibility | 100 |
| Relevance | 100 |
| Ownership | 100 |

| | |
|-----------------------|-----------|
| Implementation | 53 |
| Means & resources | 81 |
| Coverage | 0 |

ENV1.3 Development of green products and services

(score: 71, weight: 2)



Relevance of the company's commitment to integrate environmental issues in its lending and investment activities

The Company's commitment is comprehensive and it has set "Provide products and services that help clients to adapt to climate change" as a target, which is 6 kind of products offered for 2020. In addition, the Company is a signatory of the Equator Principles III and UNPRI.

Ownership of the commitment

The commitment applies throughout the company, supported by the senior management. In addition, specific units/ teams within the concerned departments are involved in the implementation of the policy

The projects will be subject to an environmental and social risks assessment by the Risk Vicepresidency, Legal Department and the Origination Management area.

Means allocated to the integration of environmental issues in lending activities

In addition to assessing environmental risks and managing them, the bank is proactive in raising the awareness of its clients/ industrial sectors on sensitive environmental matters, also in cooperation with stakeholders

Through its Controversial Issues Policy, the Company defines a model regarding the intervention on economic activities that cause socio-environmental impacts for financing operations. In addition, the Company trains its sales force in Sustainable Businesses to support its customers and to be able to assess the environmental risks of these. Moreover, the Customers are also invited to trainings on energy and water saving and how to use these important resources more efficiently, as well as the Company is supported by other consultants companies to identify ways that our clients could easily implement as their contribution to the environment.

Coverage of the measures in place to integrate environmental issues in lending

The processes cover the transaction as defined in the EP III version and other business lines or sensitive clients.

In addition to the EP III standards, the Company considers projects subject to assessment to Projects if the amount to be financed by Bancolombia exceeds US 10 Millions, Projects with a value that exceeds US 50 Millions, independent of the amount funded by Bancolombia and any corporate fund that exceeds the amount of US 100 Millions focus on projects in environmentally and socially sensitive economic sectors.

Means allocated to the integration of environmental factors in investment activities

The company has allocated some means to the development of sustainable investment products/strategies

- Exclusionary screening
- Positive screening (including best-in-class approach)
- Thematic funds
- Engagement with the companies
- Voting policies covering ESG issues

Of note, the Company is committed to incorporate ESG matters in its investment decisions.

Coverage of the measures in place to integrate environmental factors in investment activities

The company adopted these strategies in a significant part of its investment portfolio (> 10%; < 50%)

According to the UNPRI Transparency Report, the exclusionary screening and the ESG analysis cover to the majority of the companies which Bancolombia invest.

Stakeholders' feedback

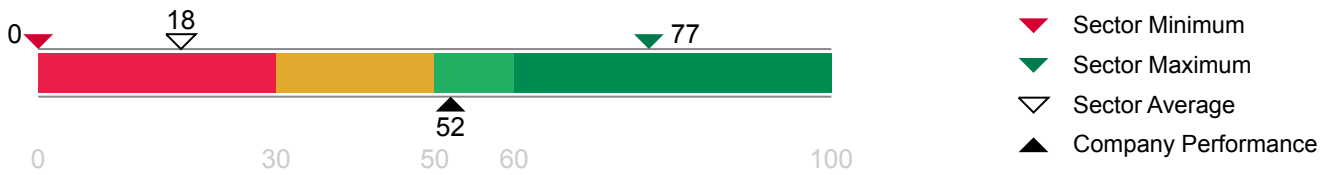
A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | | | | | |
|-------------------|-----------|-----------------------|-----------|----------------|-----------|
| Leadership | 83 | Implementation | 66 | Results | 65 |
| Relevance | 100 | Means & resources | 67 | Performance | 65 |
| Ownership | 65 | Coverage | 65 | | |

ENV2.2 Minimising indirect environmental impacts from energy use

(score: 52, weight: 3)



Relevance of the company's commitment to reduce its energy consumption/ CO2 emissions

The Company has set quantified targets with regard to its energy consumption in Colombia, El Salvador and Panama, which represent about 94% of the Company's operations.

Relevance of the company's commitment to reduce climate change through its financing activities

The Company has formulated policies on sensitive sectors and has a formal commitment to support a low carbon economy through the promotion and orientation of efforts to face global challenges that generate local impacts, offering products and services for mitigation and adaptations orientated towards climate change.

Means allocated to assess climate risks in financing activities and to support a low carbon economy

The company has processes to systematically consider climate risks in its financing activities and set up dedicated financing channels to support the energy transition

Bancolombia Green Credit Line is a credit line funds sustainable projects developed by our customers considering energy efficiency, renewable energy and clean production. In addition, Bancolombia has implemented its Sustainable Businesses Strategy to support its customers in the developments of their projects and help them to detect projects that promotes the use of clean technologies, renewable energy, reduction of wastes and emissions, efficient use of energy, cleaner fuels, among others. In addition, the Company carries out events on generation of knowledge to customers in areas such as energy efficiency, saving and climate variability. In such events, the Green Financing Lines are made available intended to support the implementation of projects or assets that are aligned with adjustment and mitigation strategies.

Coverage of the means allocated to assess climate risks

The company has allocated these means in its main activities

The Company has implemented these strategies at least in Colombia, where the Company has more than the 67% of its operations.

Means allocated to reduce the company's own energy consumption and CO2 emissions

The company has set up measures to improve energy efficiency

Bancolombia has implemented measures of power efficiency in its branches such as: Equipped them with solar energy systems, implementation of dynamic control in air-conditioning compressors allows the compressor engine to consume the minimum amount of energy and the installation of Solar control films in windows from about 84 branches in Colombia, intended to decrease thermal charge of the air conditioning system and generate relevant electric energy savings.

Coverage of the means in place to reduce the company's own energy consumption and CO2 emissions

There is no evidence that the company has taken such measures in the majority of the Company's sites.

Performance indicators on the company's own CO2 emissions related to energy consumption

The Company's CO2 emissions linked to energy consumption and normalised to employees has decreased by 13% over the past three years from 0.7973 kt CO2 per employee in 2014 to 0.6947 kt CO2 per employee in 2016.

Trend of CO2 emissions linked to the company's portfolio

Information obtained from company and public sources regarding CO2 emissions linked to financing activities is insufficient

Evolution of the share of loans to support the energy transition

Information on the percentage of loans to finance the energy transition are not disclosed

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | |
|-------------------|-----------|
| Leadership | 76 |
| Visibility | 100 |
| Relevance | 65 |

| | |
|-----------------------|-----------|
| Implementation | 55 |
| Means & resources | 54 |
| Coverage | 55 |

| | |
|----------------|-----------|
| Results | 24 |
| Performance | 65 |
| Trends | 19 |

ENV2.7 Management of environmental impacts from transportation

(score: 56, weight: 1)



Relevance of the company's commitment with regard to the environmental impacts related to the transport of its products and/or personnel

The company has set quantified targets with regard to the environmental impacts related to the transport of its personnel, and these cover the entire group.

The Company has set targets about its Km traveled and cover the operations in Colombia, El Salvador and Panama, which represent the 94% of the Bancolombia's operations. The target in Colombia is reduce the Km traveled by 16% to 2020 with 2010 as base year. In addition, there are other targets for Panama and El Salvador.

Means allocated to minimising the environmental impacts

The company has set up most of the relevant measures to reduce its environmental impacts related to the transport of its personnel:

- Measures to reduce pollution (car maintenance, alternative fuels, driver training, etc.)
- Rationalisation of transport flows (promotion of conference calls, train travels, etc.)
- Improvement of personnel transport mix/commuting (promotion of public transport, cycling, financing job tickets, car sharing, etc.)
- Cooperation with local authorities (involvement in transport infrastructures, mobility plans, etc.)

- Measures to reduce pollution: the Company has implemented alternative energies in vehicles, intended to reduce environmental impact during operation and maintenance of vehicles, carbon footprint, reduction of hazardous wastes, among others.

- Rationalisation of transport flows: the Company educated on the use of teleconference, web conference, videoconference, phone call, e-mail, and some other connectivity tools to its frequent travelers.

- Improvement of personnel transport mix: shared travels were implemented to go to different airports in Colombia, allowing to the company decrease land transportation routes.

Coverage

The Company implemented this measures in Colombia, where the Company has the majority of its operations.

Energy consumption or CO2 emissions related to transportation

The CO2 emission from transport per employee has decreased, but not continuously, by 23% over the past five years, from 0.100 t CO2 per employee in 2012 to 0.077 tCo2 per employee in 2016.

Trend in transport mix

Information obtained from company and public sources regarding the company's transport mix is insufficient to determine a trend.

| Leadership | 65 | Implementation | 65 | Results | 39 |
|------------|----|-------------------|----|-------------|----|
| Relevance | 65 | Means & resources | 65 | Performance | 65 |
| | | Coverage | 65 | Trends | 0 |

Human resources

Score: 40

HRS1.1 Promotion of labour relations

(score: 40, weight: 2)



Visibility of commitment

The Company has issued a formalised commitment to promote labour relations in its Labor Relations Policy.

Relevance of commitment

The company's commitment to promote labour relations is general.

The Company states that collective bargaining is negotiated according to legal regulation and agreements between the parties, and must ensure that the different solutions contribute to promoting negotiation, agreement, and above all, collective construction of a healthy working environment.

Ownership of commitment

The commitment applies throughout the Company, supported by Bancolombia Sustainability department.

Coverage of employee representative bodies

Information obtained from company and public sources regarding the percentage of sites where employee representation structures are in place is insufficient.

Subjects covered by collective bargaining

Collective bargaining between the company and employee representatives deals with subjects related to working conditions, including:

- health & safety
- CSR issues
- remuneration
- working hours
- training
- career development
- work time flexibility
- age conscious human resources management
- stress management
- equal opportunities

- health & safety: Among other benefits, the agreement includes life and health insurances.

- remuneration: the Bargaining agreement includes a pay increase for the Company's employees.

Employee representative bodies in countries with restrictive legislation

In countries with restrictive legislation, the company informs employees through alternative employee representative bodies.

The employees decides either to be part of or not of a union labor which negotiate with the Company collective bargaining agreements.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

Coverage of collective agreements on working conditions

Collective agreements on working conditions cover 63% of its employees.

| Leadership | 37 | Implementation | 19 | Results | 65 |
|------------|----|-------------------|----|-------------|----|
| Visibility | 65 | Means & resources | 65 | Performance | 65 |
| Relevance | 30 | Scope | 30 | | |
| Ownership | 30 | Coverage | 0 | | |

HRS2.3 Responsible management of restructurings

(score: 22, weight: 3)



Relevance of commitment to manage reorganisations responsibly

The company does not disclose any commitment to manage reorganisations responsibly.

Involvement with employee representatives

The company does not disclose any commitment to inform and consult employee representatives on reorganisations.

Means allocated to prevent and manage reorganisations

Information obtained from company and public sources regarding measures allocated to prevent and manage reorganisations is insufficient.

- significant financial compensation
- early retirement
- outplacement services
- individualised follow-up of employees
- reduction of labour time
- internal mobility programme
- re-training

Coverage

Information obtained from company and public sources regarding the percentage of sites where such measures are taken is insufficient.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

Result of the company's commitment to manage reorganisations responsibly

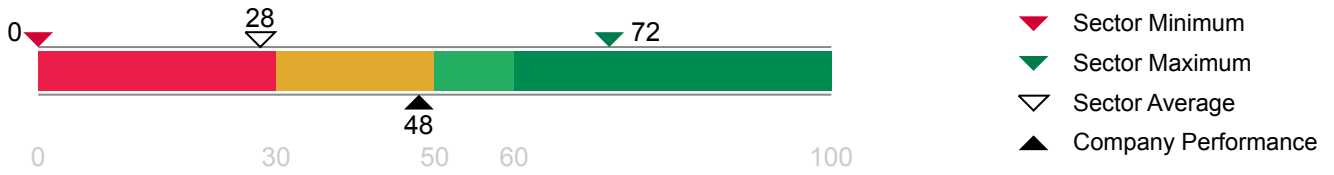
The company has been able to avoid layoffs or dismissals.

The number of employees of the Company has remains stable over the past three years, standing at 31.598 employees in 2016.

| | | | | | |
|-------------------|---|-----------------------|---|----------------|----|
| Leadership | 0 | Implementation | 0 | Results | 65 |
| Relevance | 0 | Means & resources | 0 | Performance | 65 |
| Ownership | 0 | Coverage | 0 | | |

HRS2.4 Career management and promotion of employability

(score: 48, weight: 2)



Visibility of commitment

The Company made some general statements promoting career management and training in its Annual Report.

Relevance of commitment

The company's commitment to promoting career management and training addresses its main responsibilities:

- Anticipate short and long-term employment needs and skill requirements
- Adapt employees' skill sets to their career paths
- Elaborate individual development plans
- Promote age conscious training and development

Ownership of commitment

Mr. Enrique González is part of the Company's Executive Committee. However line managers do not appear to be evaluated on their performance in terms of HR management

Career management systems

The Company has set up an internal job opportunity marketplace and has formalised the skill requirements for the various job positions. Moreover, there are individual development plans in place. Employees receive performance evaluations as well.

Coverage of career management systems

These career management systems cover all of the company's employees.

In 2016, 97.6% employees had performance evaluations.

Types of training provided to non-managers

The training programmes are aimed at adapting employees' skills to the requirements of their current position and also enable them to develop additional skills. Risk management and compliance issues are part of the common training curriculum.

Bancolombia provides training courses, both personally attended and on-line, which include content relating to regulatory compliance, risk prevention, information transparency and internal controls.

Means allocated to training for all employees

the ratio of Number of training hours / Number of employees has decreased by 20.8% over the past three years, from 46 training hours per employee in 2014 to 36.4 training hours per employee in 2016.

Mobility / turnover

The turnover ratio has decreased over the past three years by 3.5 percentage points from 7.5% in 2014 to 11% in 2016.

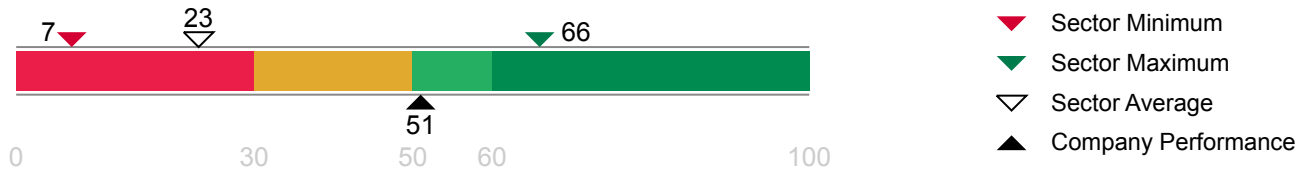
Training delivered during the year under review

The precise percentage of employees having received training during the year under review is not disclosed.

| | | | | | |
|-------------------|-----------|-----------------------|-----------|----------------|-----------|
| Leadership | 48 | Implementation | 66 | Results | 30 |
| Visibility | 30 | Means & resources | 55 | Performance | 30 |
| Relevance | 65 | Coverage | 100 | | |
| Ownership | 30 | | | | |

HRS3.2 Improvement of health and safety conditions

(score: 51, weight: 3)



Visibility of health & safety commitments

The Company has made a formalised commitment to health and safety issues in its Human Rights Policy.

Relevance of commitment

The company's commitment is general.

- ensure awareness about health and safety issues
- reduce the number of work accidents and their severity
- prevent occupational disease
- reduce stress/promote well-being
- improve ergonomics
- reduce the rate of absenteeism

Bancolombia is committed to provide a safe and healthy working environment by adopting advanced norms and procedures regarding occupational health and professional risks prevention, and by complying with legal requirements that apply in each particular case.

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, responsibility for commitments is allocated to a dedicated structure or local managers are held accountable.

Human Resources, Administrative services Business Units and Sustainability departments are involved in the implementation of the policy.

Means allocated to health and safety

The company has allocated means to address health and safety issues, including:

- training/awareness raising programmes
- internal monitoring
- risk assessments
- internal H&S audits
- H&S competitions
- remuneration based on H&S performance
- OHSAS 18001 certifications

- training programmes: the Company had trainings in security and health in work, including at least a simulation of emergencies.

Means allocated to reduce stress at work

The health programs are mainly concerned with the treatment, rehabilitation and recovery process of individuals.

- Employee assistance programme / hotline (stress only)/counselling
- Job redesign (work organisation)

- Training on stress for managers
- Monitoring of absenteeism/rate of occupational disease; assessment of stress through analysis of internal H&S data
- Awareness campaigns and information
- Training on stress for employees
- Measures to improve ergonomics
- Detection of stress: Identification of stress sources/risks assessments
- Avoidance of overtime
- Employee oriented flexibility (work/life balance)
- Employee participation tools (opinion surveys, dedicated teams, workshops)

- Employee oriented flexibility: the Company implemented practices such as flexible working hours, remote work among other to achieve a balance between family life and work.

Coverage of means allocated to address mental health

The mental health and safety measures cover a majority of the company's employees.

The Monitoring of the absenteeism and the flexitime initiatives apply throughout the Bancolombia Group.

Accident frequency rate

The Company's work accidents has almost remained stable at 0.02% between 2013 and 2016. Of note, the indicator represent the % of lost time.

Other health and safety indicators

The Rate of Absenteeism has remained stable over the past 5 years, standing at 1.9% in 2016

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

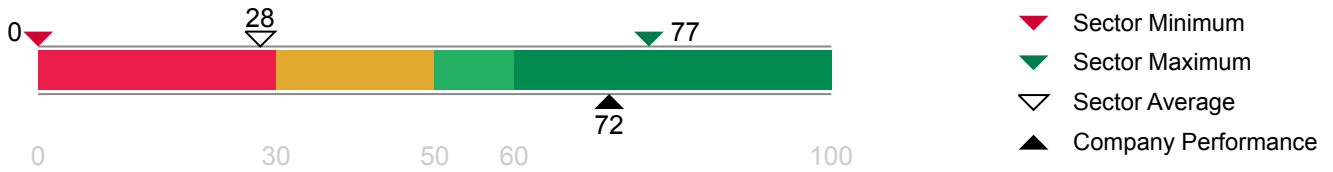
| | | | | | |
|-------------------|-----------|-----------------------|-----------|----------------|-----------|
| Leadership | 55 | Implementation | 37 | Results | 60 |
| Visibility | 65 | Means & resources | 30 | Performance | 60 |
| Relevance | 30 | Scope | 30 | | |
| Ownership | 65 | Coverage | 65 | | |

Human rights

Score: 58

HRT1.1 Respect for human rights standards and prevention of violations

(score: 72, weight: 2)



Visibility of commitment to support human rights in the business

The Company has issued a formalised commitment to respect and promote human rights in society in its Human Rights Policy. In addition, the Company is a signatory of the Equator Principles, the UNPRI and of the Global Compact and communicates on this principle.

Relevance of commitment

The company's commitment to respect and promote human rights addresses the majority of its business activities, referring to recognised standard

Through the Human Rights Policy the Company is committed to protect, respect and remedy Human Rights, complying with the Universal Declaration, included in the Humanitarian International Law, the ILO and the local legislation of the countries where the Group has presence.

Ownership of commitment

The commitment applies throughout the company, supported by the senior management. In addition, specific units/ teams within the concerned departments are involved in the implementation of the policy.

Human Resources, Administrative services Business Units and Sustainability departments are involved in the implementation of the policy.

Means allocated to manage human rights risks in business activities

The company has adopted comprehensive measures, including:

- Dedicated training for staff
- External review
- Awareness raising/ assistance programs for clients
- Mapping of risk exposure of clients, sectors, projects, markets
- Dialogue/ engagement with companies/ countries/ sectors on human rights
- Exclusion of business relations with clients, sectors, countries violating human rights
- Set up of grievance mechanism through which stakeholders affected can voice their concerns (directly to the bank)
- Consultation/ cooperation with stakeholders

- Awareness raising programs for clients: the Company invited to its customers to include social impacts studies and the participation of the potential affected communities.

- Mapping of risk exposure of clients, sectors, projects: In 2015, the Company conducted evaluations to 164 Companies in energy, gas and mining industry on Human Right issues to detect human rights violations and designed the Controversial Issues Policy to define the activities that shall not be financed because of their high social impact.

- Exclusion of business relations with clients, sectors, countries violating human rights: the Company will evaluate to finish commercial relationships with those suppliers, contractors or partner companies that irrefutably infringe Human Rights

and specially those regarding Child Labor.

- Set up of grievance mechanism through which stakeholders affected can voice their concerns: the Employees, customers or any stakeholder can use the BanColombia's Ethics line, which is the instrument to report any type of breaching to the violation of human rights, then the cases will be subject to investigation.
- Awareness raising for employees: the Company has received trainings on the GRI Methodology reporting on the Company's reports on its Human Right Efforts.
- Internal audits: the Sustainability area, at least annually, revise the results of the compliance of the Human Rights Policy.

Coverage

There is no evidence that the measures taken in place has been applied to the majority of the Company's sites.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | |
|-------------------|-----------|
| Leadership | 79 |
| Visibility | 65 |
| Relevance | 100 |
| Ownership | 65 |

| | |
|-----------------------|-----------|
| Implementation | 72 |
| Means & resources | 100 |
| Coverage | 30 |

| | |
|----------------|-----------|
| Results | 65 |
| Performance | 65 |

HRT2.1 Respect for freedom of association and the right to collective bargaining

(score: 43, weight: 2)



Visibility of commitment

The Company has issued a formalised commitment to freedom of association and the right to collective bargaining in its Human Rights Policy. In addition, the Company is a signatory of the Global Compact but does not communicate on this principle.

Relevance of commitment

The company's commitment addresses its main responsibilities:

- protection of freedom of association and the right to organize
- respect of the right to collective bargaining
- respect and protection of workers' representatives

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved.

Human Resources, Administrative services Business Units and Sustainability departments are involved in the implementation of the policy.

Monitoring

It is not clear what steps the company takes to ensure that freedom of association is respected throughout the company's operations (e.g.: through external verification, risk mapping, audits, etc.)

- occasional risk mapping
- occasional internal audits
- on-going monitoring of labour rights risks
- regular internal audits
- external audits/verification
- external investigation of allegations
- cooperation with unions: joint audits, joint grievance procedures etc.

Promotion of collective bargaining

Information obtained from company and public sources regarding measures in place to inform employees about their trade union rights is insufficient.

Coverage

Information obtained from company and public sources the percentage of the company where such labour rights systems and programmes are in place is insufficient.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the

company during the period under review: stakeholders' feedback is neutral.

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

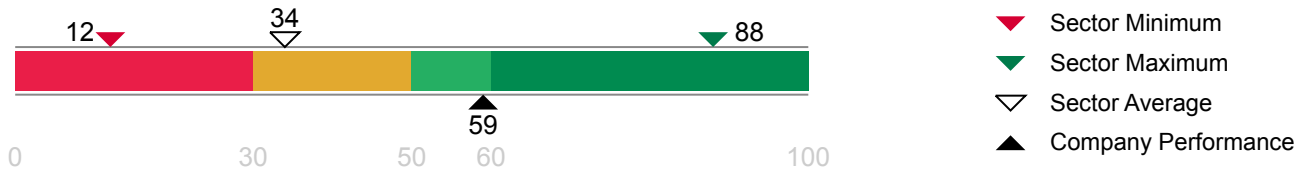
| | |
|-------------------|-----------|
| Leadership | 65 |
| Visibility | 65 |
| Relevance | 65 |
| Ownership | 65 |

| | |
|-----------------------|----------|
| Implementation | 0 |
| Means & resources | 0 |
| Coverage | 0 |

| | |
|----------------|-----------|
| Results | 65 |
| Performance | 65 |

HRT2.4 Non-discrimination

(score: 59, weight: 3)



Visibility of commitment

The Company has issued a formalised commitment to non-discrimination in its Human Rights Policy. In addition, the Company is a signatory of the Global Compact but does not communicate on this principle.

Relevance of commitment

The company's commitment to non-discrimination explicitly defines most of the categories covered:

- gender
- sensitive medical conditions
- trade union membership or activities
- other (please define)
- race / ethnicity / nationality
- social background
- religion
- sexual orientation
- family responsibilities (including pregnancy)
- disabilities
- political opinion
- age

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved.

Human Resources, Administrative services Business Units and Sustainability departments are involved in the implementation of the policy.

Means allocated

The company has set up significant measures to prevent discrimination and promote diversity:

- awareness raising
- maternity pay (greater than the statutory requirement)
- paternity pay (greater than the statutory requirement)
- job sharing initiatives
- child care facilities/child care subsidies
- flexitime
- training
- monitoring
- confidential reporting system / grievance procedures
- disciplinary procedures / corrective measures
- affirmative action programmes
- monitoring of salary disparities

career break opportunities

- monitoring: the Company monitors the share of women in the total workforce and in its management positions.
- confidential reporting system: Through the Ethics line, the employees can reports confidentially violatiios to the Human Rights Policy, including discrimination issues.
- monitoring of salary disparities: the Company reports on the wage remuneration by gender and age range.
- flexitime: the Company incorporated teleworking in its operations. 72% of the users of teleworking are women.

Coverage

Although the Bancolombia has set up monitoring and confidential reporting systems throughout the Company, there is no evidence that the flexitime programmes covers to the majority of the Company's employees.

Results in terms of gender distribution

The percentage of women in management positions has remains stable in the Company over the past three years, standing at 55% in 2016.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | |
|------------|----|
| Leadership | 65 |
| Visibility | 65 |
| Relevance | 65 |
| Ownership | 65 |

| | |
|-------------------|----|
| Implementation | 48 |
| Means & resources | 65 |
| Coverage | 30 |

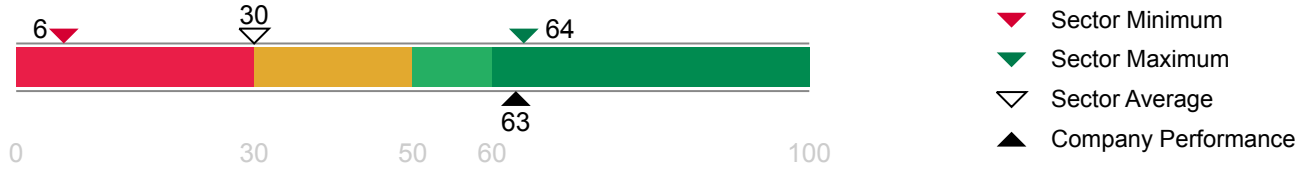
| | |
|-------------|----|
| Results | 65 |
| Performance | 65 |
| Trends | 65 |

Community involvement

Score: 49

CIN1.1 Promotion of the social and economic development

(score: 63, weight: 3)



Visibility of the commitment to support local development

The company has made references to the promotion of local social and economic development in its:

Annual Report.

Relevance of the commitment

The company's commitment to promote local social and economic development addresses all of its responsibilities:

- Promote local entrepreneurship through SME financing
- Support to community investments
- Implement a responsible tax strategy (as a company)
- Encourage responsible tax practices by clients (as tax services providers)

- *Support to community investments: Through Bancolombia Foundation, the Company is committed to improve the standard of living of the communities through integral programmes for the early childhood, education, as well as corporate voluntary services.*

- *Promote local entrepreneurship through SME financing: In addition to the other commitments, Bancolombia through its Bancolombia Foundation is committed to support entrepreneurship in the communities where the Company is present.*

- *Implement a responsible tax strategy: the Company is committed to pay attention in a responsible and timely way to its functions as a tax player, in order to timely comply with its fiscal obligation, according to norms in force, laws, decrees, doctrines and jurisprudence issued by national entities of every country where the Company operates.*

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, responsibilities have been clearly assigned (department, unit, council)

In addition, is responsibility of Bancolombia Foundation Promote local entrepreneurship and the Audit vicepresidency and Sustainability Area are in charge of comply with the Tax Policy .

Means allocated

The company has allocated some means to address social and economic development, including:

- Support to SME's and/or business start-ups (investment, logistical support, training, advices)
- Impact investing actions (dedicated social impact funds, social bonds, social/ societal investments)
- Support local development through investee companies (for ex. thematic investment funds, private equity, etc.)
- Support to public and/or community development/investments

- Support to micro-finance providers (through, for ex. dedicated investment vehicles)
- Cooperation with NGO's or other relevant stakeholders on local development
- Support the financial infrastructure in developing countries

- Support to SME's and business start-ups: the Company assist SME to start and search business models with projections of exponential growth , innovators and with social impact.

- Impact investing actions: the Company has social investment through Social innovation to carry water to 2 sites in Colombia (Islote and Guajira).

- Support to community development: in 2016, the Company, Through Bancolombia Foundation, invested in Education, Early Childhood, Social development and Coexistence.

- Cooperation with NGO's or other relevant stakeholders on local development: Bancolombia works in partnership with the Carvajal Foundation based on an inclusive business model in Cali, to support eight families with the launching of a production unit that is creating full-time jobs.

Geographical coverage

There is no evidence that these means are allocated in the majority of the company sites.

Trend of indicators measuring the "impact" of the company's community development engagement

The company's indicators on the impact of its contribution to local development have improved over the past three years

The amount invested in Entrepreneurship has increased by 88% over the past three years, from 1.591 millions COP in 2014 to 2.996 Millions COP in 2016. In addition the number of beneficiaries has also increased by 84% from 283 beneficiaries in 2014 to 521 beneficiaries in 2016.

Transparency of tax reporting

The Company reports significantly on taxes paid. Reporting covers:

- taxes paid in some countries of operations
- taxes paid in some regions of operations
- taxes paid in key regions of operations
- taxes paid in key countries of operations
- sales per zone
- operating profit per zone
- number of employees per zone
- ratio between tax paid and headline corporate tax rate per zone
- explanation for significant differences between tax rate actually paid and expected tax rate

- taxes paid in key countries of operations: the Company reports its taxes paid in all the countries where the bank operates.

Presence in IMF 'offshore financial centers' and/ or in jurisdictions considered by the OECD as not compliant enough with tax transparency rules

The Company operates in IMF 'offshore financial centres' and/ or in jurisdictions considered by the OECD as not compliant enough on tax transparency rules, and it justifies its presence in most of them.

The Company operates in Panama and Cayman Island, which are IMF 'offshore financial centres' , but the company has active operations in these sites.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy

related to this sustainability driver.

| | |
|-------------------|-----------|
| Leadership | 69 |
| Visibility | 30 |
| Relevance | 100 |
| Ownership | 65 |

| | |
|-----------------------|-----------|
| Implementation | 55 |
| Means & resources | 65 |
| Coverage | 30 |

| | |
|----------------|-----------|
| Results | 65 |
| Performance | 65 |
| Trends | 65 |

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CIN2.1 Societal impacts of the company's products / services

(score: 34, weight: 3)



Visibility of the company's commitment to promote financial inclusion

The company has made references to address the accessibility of its products/ services in its:

Annual Report.

Relevance of commitment

The company's commitment is general

- promote access to basic banking services for weaker customers
- promote access to credit for weaker customers
- support customers in financial distress
- prevent clients' discrimination

The Bank has as strategy reach segments none attended by the financial system such as low income customers.

Ownership of commitment

It is unclear who is responsible for the company's commitment or to which parts of the company it applies.

Means allocated to promote access to basic financial services:

The company has allocated some measures to promote access to basic financial services

- Access to basic banking services
- Access to credit
- Financial education (to community at large)
- Systems to prevent the discrimination of customers
- Specific training for sales personnel
- Development of expertise through cooperation with stakeholders (long term and stable partnerships)

- Access to basic banking services: Bancolombia created low-income savings products ("Saving on hand") with no fees allowing the creation of savings accounts directly with a mobile phone.
 - Access to credit: the Company has implemented the programme "Loan on Hand" taht gives a low amount credit fully digital and intended to fight the non-formal jobs. This credit could be paid out in one day, turning in many cases the first financing product with the financial system for many people.
 - Financial education: through activities such as the "International Financial Education Week for Children and Youngsters" and the "International Savings Week", Bancolombia was able to extend its financial education program to more people, explaining to them the importance of knowing how to handle their financial products. Also through our on-line classroom initiative, the bank provides educational material on topics such as responsible borrowing, channel usage and savings, amongst other important issues.

Information obtained from company and public sources regarding measures allocated to manage the negative impacts of its products/services.

Means question on programs to support customers in financial distress

- Monitoring of weaker customers (early warning system)
- Specific product training for sales personnel
- Support programs in case of financial distress (debt restructuring)
- Specialised departments/business units
- Development of expertise through cooperation with stakeholders

Coverage of means allocated to promote access to basic financial services:

There is no evidence that these means are allocated in the majority of the company sites

Trend of indicators measuring company efforts to promote financial inclusion

The number of transaction in the "Loan on hand" programme has increased by 34% over the past two years, from 411,350 transactions in 2015 to 551,217 transactions in 2016.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | |
|-------------------|-----------|
| Leadership | 21 |
| Visibility | 30 |
| Relevance | 30 |
| Ownership | 0 |

| | |
|-----------------------|-----------|
| Implementation | 32 |
| Means & resources | 32 |
| Coverage | 30 |

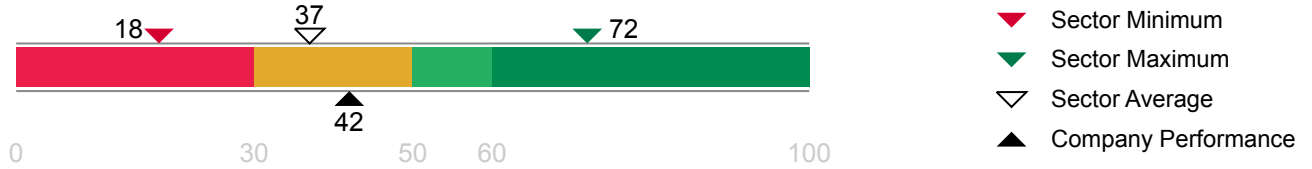
| | |
|----------------|-----------|
| Results | 49 |
| Performance | 65 |
| Trends | 30 |

Business behaviour (C&S)

Score: 48

C&S1.2 Information to customers

(score: 42, weight: 3)



Visibility of commitment to adequately informing customers about products/ services

The Company has issued a formalised commitment to adequately inform customers about its services in its Code of Ethics.

Relevance of the commitment

The company's commitment only addresses part of its responsibilities:

- provide customers with detailed information about product risks/benefits
- ensure that suitable products are sold to clients (products in line with their risk profile)
- avoid misleading marketing messages
- avoid mis-selling practices
- avoid coercive tied selling/inertia selling

- provide customers with detailed information about product risks/benefits: the Company shall provide customers with true, sufficient, clear and timely information which allow them to know their rights, obligations and costs of its products and services in an appropriate way.

Ownership of commitment

The commitment applies throughout the Company, supported by senior management. In addition, the Ethics Committee in charge of supervising compliance with provisions contained in the Code of Ethics.

Systems to monitor information to customers

The company has set up few measures to ensure customers are informed properly:

- educational tools at disposal of customers
- initiatives directly addressing transparency also in cooperation with stakeholders
- procedures to approve/monitor marketing and/or contracts material internally or externally
- systems to overcome information asymmetry (i.e. comparison tools)
- ensuring customers' suitability
- products approval processes

- educational tools at disposal of customers: all customers can obtain all information needed and learn about the company's services through its digital banking channels accessible via mobile devices or home computers.

Employees training and awareness raising

Information obtained from company and public sources regarding responsibility in marketing and commercial practices is insufficient.

Coverage of systems to monitor information to customers

It is not clear in which part of the company are these measures in place

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | |
|-------------------|-----------|
| Leadership | 39 |
| Visibility | 65 |
| Relevance | 30 |
| Ownership | 30 |

| | |
|-----------------------|-----------|
| Implementation | 21 |
| Means & resources | 17 |
| Coverage | 30 |

| | |
|----------------|-----------|
| Results | 65 |
| Performance | 65 |

C&S1.3 Responsible Customer Relations

(score: 54, weight: 3)



Visibility of commitment to responsible customer relations.

The Company has issued a formalised commitment to responsible customer relations in its Code of Ethics.

The company commits to most of its responsibilities.

- prevent unfair contract terms
- enhance customer satisfaction
- listen to customers' complaints
- cooperate with consumer associations to improve banking services
- protect clients' information assets

Relevance of commitment

- enhance customer satisfaction: the Company is committed to reach that its customers recommends it and come back again to the bank to become in business partners.
- listen to customers' complaints: the Company established that Complaints and demans should be received on a timely and accurate basis according to the law and through differents channels.
- protect clients' information assets: The Company is committed to retain and keep information that customers have provided for its relationship to the Group's companies.

Ownership of commitment

The commitment applies throughout the Company, supported by senior management. In addition, the Bancolombia Group's Ethics Committee is in charge of supervising compliance and determinate actions necessary for knowing, disclosing, and strengthening the ethical and behavior standards of each Company of the Group.

The company has set up few measures:

- staff awareness and training
- measuring performance against customer satisfaction surveys and be acting on the results
- linking the remuneration of sales staff to customers' satisfaction
- cooperating with consumer association on customers related topics (fairness of contracts, for ex.)

Means allocated to ensure responsible relations with customers

- staff awareness and training: the Company's employees are trained in issues related with Financial Consumer Defender.
- measuring performance against customer satisfaction surveys and be acting on the results: In 2016, the Company contacts about 85.000 people by phone to participate in a satisfaction survey to identify oportunities to improve its service, trying to identificate if the clients would recommend or not to their family or friends.

Complaints management system for customers

There is a formalised and accessible system to handle complaints, with detailed disclosure on procedures.

The Company has established a guideline with the channels to receives complaints, people related with these channels, procedures and the stages of the management of these complaints.

Coverage of means allocated to ensure responsible relations with customers

It is not clear in which part of the company are these measures in place

Means allocated to address cyber security and to protect key information assets

The company has set up few measures:

- There is a chief information security officer (CISO) that sets the security strategy and initiatives
- The CISO has a direct reporting relationship with the CEO
- The CISO regularly briefs the board on cybersecurity strategy
- An incident management plans (including disaster recovery and business continuity) is established
- There is security team and a dedicated security budget
- Effective communication/ training of security requirements is provided to all employees

- An incident management plans is established: The Bank has implemented several measures to anticipate, identify, and offset these threats, including perimeter defenses, security backups, special 24/7 teams and continuous security tests (including ethical hacking, among others).

Results: trend of complaints received

The number of requirements received by the Company has increased by 35% over the past three years, from 61.400 requirements monthly in 2014 to 82.962 requirements monthly in 2016.

Stakeholders' feedback

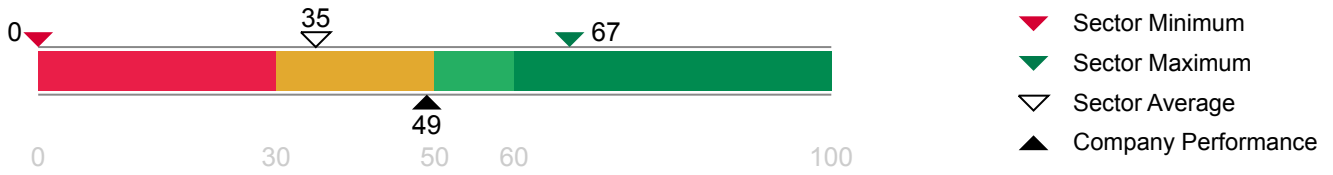
A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | | | | | |
|-------------------|-----------|-----------------------|-----------|----------------|-----------|
| Leadership | 65 | Implementation | 39 | Results | 59 |
| Visibility | 65 | Means & resources | 41 | Performance | 65 |
| Relevance | 65 | Coverage | 30 | Trends | 30 |
| Ownership | 65 | | | | |

C&S3.1 Prevention of corruption and money laundering

(score: 49, weight: 3)



Visibility of commitment on business ethics and money laundering

The Company has issued a formalised commitment to preventing business ethics risks in its Code of Ethics and in its Bribery and Anti-Corruption Policy. In Addition, the Company is a signatory of the Global Compact and communicates on this principle.

Relevance of commitment

The company's commitment addresses its main responsibilities:

- giving / receiving bribes
- money laundering
- funds derived from suspicious activities
- gifts and invitations
- extortion
- fraud
- avoid financing oppressive corrupt regimes
- conflicts of interest
- illegal financing of political parties
- prohibition of facilitation payments
- restriction of facilitation payments

Ownership of commitment

The commitment applies throughout the Company, supported by senior management. In addition, the Bancolombia Group's Ethics Committee is in charge of supervising compliance and determinate actions necessary for knowing, disclosing, and strengthening the ethical and behavior standards of each Company of the Group.

Involvement of employees on business ethics

The company has instituted formal training programmes for relevant employees on business ethics risks prevention and management.

Bancolombia Group's carries out annually an evaluation on Code of ethics to its Employees and collaborator, looking forward for its employees to validate their understanding of the Code and ratify their compromise with its compliance as to recall the rules and principles established in it. Moreover, the Company promotes through campaigns and corporate announcements the sensitization of the relevance of ethics line as mechanism to let know improper acts and fraud. In addition, The Company has instituted formal training programmes for Money Laundering and Terrorist Financing prevention and control. The trainings are evaluated. In addition, the employees contracted shall enter introduction programme about Money Laundering and Terrorist Financing risk Management System.

Means allocated (business ethics)

The company has set up reporting systems to prevent business ethics risks that include:

- internal audits (internal verification of compliance with the company's code of conduct etc.)
- approval procedures for gifts, etc. by an independent department
- the possibility to contact internal audit, legal or compliance departments directly & confidentially
- a dedicated confidential hotline or email address
- external audits (by an independent, external specialised organisation) AND/OR external investigations of allegations
- risk assessment of company vulnerability

- approval procedures for gifts, etc. by an independent department: when the price of the gifts exceed US 200, the employee shall report to direct superior (a Director for administrative offices or a Zone Manager for branches and agencies) so he/she can decide if the gift should be accepted or returned.

- a dedicated confidential hotline or email address: The stakeholders can contact to the ethic line by a dedicated emails or phone numbers.

Coverage (business ethics)

The measures implemented cover all significant parts of the company

The Code of conducts applies to all the employees at group level.

Means allocated (money laundering)

The company has set up some measures to prevent money laundering that include:

- measures to establish the identity of its clients and identify the customers whose circumstances warrant additional diligence (e.g. PEPs identification)
- development of risk assessment policies (e.g. on company structures, the customer's reputation, source of wealth/funds, involvement in public contracts, expected account activity)
- updating of customers database on a regular basis to ensure consistency and completeness and appropriate record-keeping
- procedures for identification of and follow up on unusual or suspicious activities
- a dedicated confidential hotline or e-mail address
- involvement of relevant senior managers in decisions on entering or maintaining high-risk business relationships
- thorough assessment for jurisdictions with higher level of organised crimes, AML/CTF deficient legislations

- measures to establish the identity of its clients and identify the customers whose circumstances warrant additional diligence: According to the Ethics on AML & Ft of the Company, bank is entitled to execute operation with PEP's, but this shall be made with a higher due diligence.

- development of risk assessment policies: the Company established a System for prevention and control of Money Laundering and Terrorism Financing as part of its Risk Management System, which consist of policies, procedures, methodologies, and tools for identification, measurement, evaluation, control, and monitoring of such risks.

- procedures for identification of and follow up on unusual or suspicious activities: the Company established guidelines to the procedures to its officers can send warnings related to unual operations and send reports about this issues.

- a dedicated confidential hotline or email address: The stakeholders can contact to the ethic line by a dedicated emails or phone numbers, including for Money Laundering issues.

Coverage (money laundering)

The measures implemented cover all significant parts of the company.

The Code of conducts, including the exhibit No. 4 related with Money laundering, applies to all the employees at group level.

Reporting (business ethics and money laundering)

The Company discloses quantitative data on the corruption and money laundering incidents reported internally in its Ethic line in 2016, breaking down by source (employees, clients, ex employeest, etc.), channel and subsidiaries.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

| | |
|-------------------|-----------|
| Leadership | 65 |
| Visibility | 65 |
| Relevance | 65 |
| Ownership | 65 |

| | |
|-----------------------|-----------|
| Implementation | 30 |
| Means & resources | 30 |
| Coverage | 30 |

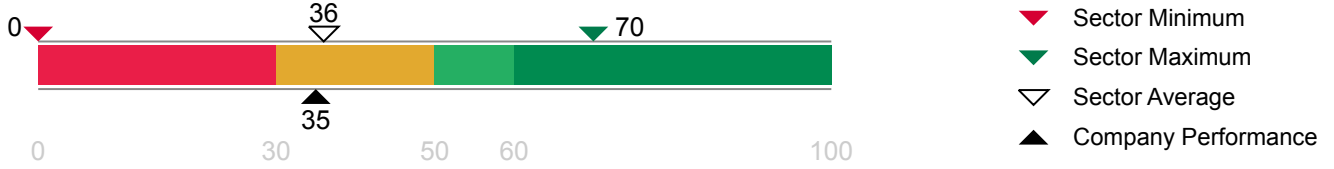
| | |
|----------------|-----------|
| Results | 53 |
| Performance | 53 |

Corporate governance

Score: 41

CGV1.1 Board of Directors

(score: 35, weight: 3)



[LISTED COMPANIES] Existence and independence of Nomination Committee No specific committee is in charge of director nomination, which might raise concerns.

Independence of the Board Chairman

The roles of Chairman and CEO are separated, but the chairman is not considered independent.

Responsibility allocated over CSR issues

The Head of CSR department/functions reports directly to the CEO/Board.
Sustainability Issues are conducted from the Sustainability Direction, which is a part of the Development of More Human Banking Vice-presidency.

Share of independent shareholder-elected Board members

The Board is 28% independent, which is less than the recommended level. Two members of the seven-member Board are considered independent.

Diversity of the skills and backgrounds of the Board

The Board of Directors diversity appears to be partial:

- At least 30% of directors are women
- At least 40% of directors are women
- Employee representative(s) sitting on the Board
- Board members with demonstrated professional experience in the company's sector of activities
- Board members with demonstrated expertise on CSR issues

- Board members with demonstrated expertise on CSR issues: Mr Arturo Condo is co founder of YGL Business Oath and member of the Board of directors of the Global Business Oath Project, which follows change the ethic behaviour of business leaders. In addition, is author and coauthor of articles, books and study cases of sustainability development.

Training and expertise provided to board members

Information obtained from company and public sources regarding training provided to board members is insufficient.

Regular election of Board members

Board members are eligible for re-election following two-year terms.

Evaluation of Board's functioning and performance

Performance is evaluated regularly, but with no disclosure on the results.

Boards of Directors shall annually conduct an evaluation of their management in topics such as attendance to meetings, participation in decisions, follow-up conducted to the Company's main aspects, evaluation of its tasks, among other.

Review of CSR issues at Board meeting

The formal CSR reporting has been signed by CEO/Chairman/Board, but there is no evidence that relevant CSR issues are reviewed at Board meetings.

- Business ethics
- Human capital
- Responsible customers relations
- Climate change
- Social and environmental considerations in lending and investments
- Tax policy
- Financial inclusion

Regularity of and attendance at Board meetings

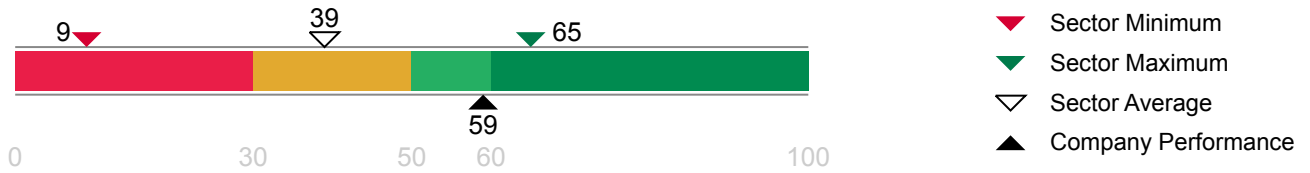
Regular meetings are held, and attendance rates are above 90%

The Directors shall meet at least once a month, and the Company reports that the attendance rate of the meetings was 100%

| Name of Board member | Role | Executive | Non executive | Employee representative | Nomination | Audit | Remuneration | Former executive | > 9 years on Board | Stock options | Paid>1/2 executive salary | Represent>3% company's shares | Other | Independency |
|----------------------|---------------------------------------------------------------|-----------|---------------|-------------------------|------------|-------|--------------|------------------|--------------------|---------------|---------------------------|-------------------------------|---------------------------------------------------|--------------|
| David Bojanini | President of the Board. Member of the Risk Committee | | X | | | | | | X | | | X | Member of Grupo Nutresa Board of Directors. | |
| Gonzalo Pérez | | | X | | | | X | | X | | | X | Member of Grupo Nutresa Board of Directors. | |
| Hernando Gomez | Chairman of the Audit Committee. Member of the Risk Committee | | X | | | X | | | | | | | | X |
| Roberto Steiner | Memeber of the Risk Committee | | X | | | | | | | | | | | X |
| Luis Restrepo | | | X | | | | X | | | | | | the Company does not consider him as independent. | |
| Arturo Condo | | | X | | | X | | | | | | | the Company does not consider him as independent. | |
| Andrés Mejía | | | X | | | X | X | | | | | X | He was member of Proteccion SA | |

CGV2.1 **Audit & Internal Controls**

(score: 59, weight: 3)



[LISTED COMPANIES] Existence and independence of Audit Committee

One members of the three-member Audit Committee is considered independent.

Skills and backgrounds of Audit Committee members

Members appear to have financial and relevant operational experience. In addition, Mr Arturo Condo, member of the Audit Committee, has CSR skills and experience.

Operational and CSR risks covered by the company's internal controls system

The system covers the standard issues related to financial, operational, and legal risks.

- Business ethics: non-compliance, tax avoidance, corruption
- Consumer privacy & data security
- Environmental & climate change risks in credit decisions & other banking activities
- Social & human right risks in credit decisions & other banking activities
- Inclusion, retention & development of staff
- Tax avoidance/evasion

Governance of risks

The company adopted all recommended measures for a sound risk management:

- No executive is part of the Board Risk Committee
- The Board Risk Committee is composed by a majority of independent members
- The Chairman of the Audit Committee is a member of the Risk Committee
- The Chief Risk Officer (CRO) is at par level of Chief Financial Officer (CFO)
- The CRO has direct access to the Board Risk Committee (including attending committee meetings)

Role of the Audit Committee in overseeing internal and external controls

The Audit Committee has a limited role that includes:

- Oversee internal audit and internal controls
- Review accounting policies and be responsible for updates
- Nominate the statutory auditor
- Oversee the work of the external auditor
- Approve the type of audit and non-audit services provided and fees paid to the external auditor

Management of the CSR risks

Limited processes dedicated to management of CSR risks appear to be in place:

- Balanced scorecard

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- Risk-related training
- Monitoring of key risk indicators
- Reporting system to the Board
- Risk mapping/materiality assessment
- A board committee (with no executive part of it) overseeing CSR risks

- *materiality assessment: the Company has established its relevant issues of the Bancolombia Group's material issues.*

Supervision of material risk-takers

Information disclosed on this subject is insufficient or not relevant.

Leverage ratio of the bank

The leverage ratio of the bank is above 7%.

At December 2016, the unweighted leverage ratio of the bank ((Equity - (goodwill and less tangible assets)/ Total assets)) was 8.04%

Independence of the firm's external auditors

The audit firm receives non-audit fees, but these represent only 5% or less of total fees.

Non-audit fees represented 0.1% of total fees paid to Deloitte & Touche Ltda. in 2016.

Inclusion of CSR issues in the company's reporting

The Company publishes significant CSR reporting on key material issues, with an independent third party assessment (Deloitte) of the reliability of key performance indicators, with limited level of the assurance.

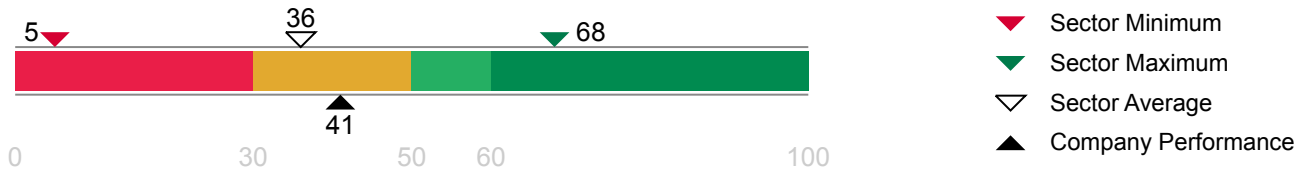
Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

CGV3.1 Shareholders

(score: 41, weight: 2)



| | |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nonexistence of voting rights restrictions | Minor voting rights restrictions have been identified. <i>The Company has preferred shares.</i> |
| Nonexistence of anti-takeover devices | There is no reference to anti-takeover devices in the company's reporting. |
| Safeguards on transactions with major shareholder(s) | No safeguards appear to be in place, which might raise concerns with regard to the fairness of any such transaction. |
| Ability to add items to the agenda of the AGM and to convene an EGM | Major restrictions have been identified to convene an EGM. <i>The Company's Bylaws establish an unreasonable level of share ownership (20%) required to call an Exceptional General Meeting.</i> |
| Access to voting at General Meetings | There are no major restrictions on shareholders' ability to vote, however there is no possibility of voting through online services. |
| Ability to vote on relevant issues in separate resolutions at AGM | Not all major items are put to a shareholder vote. <i>The following items are not put to a vote at the AGM:</i> <i>- Executive remuneration</i> |
| Presentation of CSR strategy to shareholders and investors | The company has presented to shareholders and investors its CSR strategy and this covers some of the most relevant CSR issues. <input type="checkbox"/> Climate change <input type="checkbox"/> HRT and ENV issues in lending and investments <input checked="" type="checkbox"/> Human capital <input checked="" type="checkbox"/> Responsible customer relations <input checked="" type="checkbox"/> Business ethics <input checked="" type="checkbox"/> Tax policy <input checked="" type="checkbox"/> Financial inclusion <i>- Human capital: The Company explain its management on its talents in the Company and which are its current main strategies and its evolution.</i> <i>- Responsible customer relations: the Company reports about its programme "Angels" to make and keep the relations with its customers simple and close relationship.</i> |

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- *Business ethics: the Company reports the results of its evaluation to its code of ethics within the Company's employees.*
- *Tax policy: the Company reports about its tax policy and how much they paid in the different countries where the Company operates.*
- *Financial inclusion: the Company explained the strategies and measures on Financial inclusion in its subsidiaries in El Salvador.*

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

CGV4.1 Executive Remuneration

(score: 21, weight: 2)



[LISTED COMPANIES] Existence and independence of Remuneration Committee

No executive is a member of the committee, but half or fewer are independent.
None of the three-member Appointment, Compensation, and Development Committee is considered independent.

Disclosure of senior executives' individual remuneration

Disclosure of individual executive remuneration data for senior executives is insufficient.

Link between Short Term Incentive Plans and the performance of the company

Bonuses are linked to predetermined and disclosed economic and/or operational performance indicators. However the actual quantified targets are not disclosed.

The Company has a SVQ model (Value Added System) which gives a monetary incentive to its employees. The SVA is equal to profits minus cost of capital. If the profits are higher than the Cost of Capital, the Company pays the bonus.

Link between the main Long Term Incentive Plan and the performance of the company

Information on the rules and performance conditions guiding the allocation of long-term incentives to senior executives is insufficient.

Link between variable remuneration and CSR performance of the company

Some relevant CSR performance objectives are considered in the determination of senior executives variable remuneration and the performance targets are communicated.

- Business ethics
- Customer relations
- Contribution to social development & financial inclusion
- Indirect environmental and human right impacts
- Human resources development

- Customer relations: Arising a recommendation level (as result of the Company's survey to its customers) of 70% in 2016 and of 76% in 2020.

Severance pay for senior executives

Severance pay may exceed 2 years' base salary, contrary to standards advocated by Vigeo.

According to the Colombian law, employees hired before 1990 are entitled to receive one month's salary for each year of service. This benefit accumulates and is paid to the employees upon their termination or retirement from the Bank, calculated based on the employees' last salary base. This includes to senior management.

Risk alignment of remuneration of top senior executives

Less than 60% of the variable remuneration component is deferred.

30% of the bonus is deposit in an Institutional Voluntary Pension Fund so it can in representation of the employee invest in Bancolombia's Shares and which obliged to a 3 year minimum permanence term.

Risk alignment of remuneration of material risk takers Information on risk adjustments of remuneration is insufficient or not relevant.

Evolution of CEO-to-employee compensation ratio

Information obtained from company and public sources regarding the compensation of CEO and the average employee salary is insufficient.

The CEO remuneration is not disclosed.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

As of 12/2017, BanColombia S.A. did not appear to be involved in any controversy related to this sustainability driver.

Detailed Scores and Ratings

CURRENT AND PREVIOUS RATINGS

| Period | Environment | Human resources | Human rights | Community involvement | Business behaviour (C&S) | Corporate governance |
|---------|-------------|-----------------|--------------|-----------------------|--------------------------|----------------------|
| 2017/12 | ++ | + | ++ | ++ | + | + |
| 2015/12 | + | ++ | = | + | + | + |
| 2014/11 | - | - | - | - | + | = |

SCORES PER DOMAIN

| Domain | Average Score | Leadership | Implementation | Results |
|--------------------------|---------------|------------|----------------|---------|
| Environment | 64 | 82 | 59 | 30 |
| Human resources | 40 | 34 | 28 | 57 |
| Human rights | 58 | 69 | 41 | 65 |
| Community involvement | 49 | 45 | 44 | 57 |
| Business behaviour (C&S) | 48 | 56 | 30 | 59 |
| Corporate governance | 41 | 37 | 31 | 54 |

SCORES PER CRITERIA

| Sub-domain | Criterion | Score |
|---------------|-----------|-------|
| Environment 1 | 1 | 77 |
| | 3 | 71 |
| Environment 2 | 2 | 52 |
| | 7 | 56 |

| Sub-domain | Criterion | Score |
|-------------------|-----------|-------|
| Human resources 1 | 1 | 40 |
| Human resources 2 | 3 | 22 |
| | 4 | 48 |
| Human resources 3 | 2 | 51 |

| Sub-domain | Criterion | Score |
|----------------|-----------|-------|
| Human rights 1 | 1 | 72 |
| Human rights 2 | 1 | 43 |
| | 4 | 59 |

| Sub-domain | Criterion | Score |
|-------------------------|-----------|-------|
| Community involvement 1 | 1 | 63 |
| | 1 | 34 |

| Sub-domain | Criterion | Score |
|----------------------------|-----------|-------|
| Business behaviour (C&S) 1 | 2 | 42 |
| | 3 | 54 |
| Business behaviour (C&S) 3 | 1 | 49 |

| Sub-domain | Criterion | Score |
|------------------------|-----------|-------|
| Corporate governance 1 | 1 | 35 |
| Corporate governance 2 | 1 | 59 |
| Corporate governance 3 | 1 | 41 |
| Corporate governance 4 | 1 | 21 |

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Overview of the latest updates

| Date of the latest update | Information updated |
|---------------------------|------------------------------|
| 2018/07 | Carbon & Energy Transition |
| 2018/01 | Sustainable Goods & Services |
| 2017/12 | Full ESG profile |