



| LEA 02 | Disclosures: Mandatory | Reason for Interaction | Principle: PRI 1, 2, 3 |
|--|--|---|------------------------|
| <p>Type of engagement</p> <p>Individual/ internal staff engagements</p> | <p>Reason for Interaction</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input checked="" type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input checked="" type="checkbox"/> To engage internal ESG advisors <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage in internal staff | <ul style="list-style-type: none"> <input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> To engage internal ESG advisors <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage in collaborative engagements | |
| <p>Type of engagement</p> <p>Collaborative engagements</p> | <ul style="list-style-type: none"> <input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> To engage internal ESG advisors <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage in collaborative engagements | <ul style="list-style-type: none"> <input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> To engage internal ESG advisors <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage in collaborative engagements | |
| <p>Type of engagement</p> <p>Service provider engagements</p> | <ul style="list-style-type: none"> <input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> To engage internal ESG advisors <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage in service provider | <ul style="list-style-type: none"> <input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues <input type="checkbox"/> To influence corporate practice or identify the need for additional or enhanced information <input type="checkbox"/> To engage internal ESG advisors <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage in service provider | |

RI TRANSPARENCY REPORT

2018

Bancolombia

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2018 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

| Symbol | Status |
|--------|---|
| ✓ | The signatory has completed all mandatory parts of this indicator |
| ☑ | The signatory has completed some parts of this indicator |
| 🔒 | This indicator was not relevant for this signatory |
| - | The signatory did not complete any part of this indicator |
| Ⓜ | The signatory has flagged this indicator for internal review |

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

| Organisational Overview | | | | Principle | | | | | | General |
|-------------------------|---|--------|------------------------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| OO TG | | ✓ | - | | | | | | | |
| OO 01 | Signatory category and services | ✓ | Public | | | | | | | ✓ |
| OO 02 | Headquarters and operational countries | ✓ | Public | | | | | | | ✓ |
| OO 03 | Subsidiaries that are separate PRI signatories | ✓ | Public | | | | | | | ✓ |
| OO 04 | Reporting year and AUM | ✓ | Public | | | | | | | ✓ |
| OO 05 | Breakdown of AUM by asset class | ✓ | Asset mix disclosed in OO 06 | | | | | | | ✓ |
| OO 06 | How would you like to disclose your asset class mix | ✓ | Public | | | | | | | ✓ |
| OO 07 | Fixed income AUM breakdown | ✓ | Public | | | | | | | ✓ |
| OO 08 | Segregated mandates or pooled funds | 🔒 | n/a | | | | | | | ✓ |
| OO 09 | Breakdown of AUM by market | ✓ | Public | | | | | | | ✓ |
| OO 10 | Active ownership practices for listed assets | ✓ | Public | | | | | | | ✓ |
| OO 11 | ESG incorporation practices for all assets | ✓ | Public | | | | | | | ✓ |
| OO 12 | Modules and sections required to complete | ✓ | Public | | | | | | | ✓ |
| OO LE 01 | Breakdown by passive, quantitative, fundamental and other active strategies | ✓ | Public | | | | | | | ✓ |
| OO LE 02 | Reporting on strategies that are <10% of actively managed listed equities | 🔒 | n/a | | | | | | | ✓ |
| OO FI 01 | Breakdown by passive, active strategies | ✓ | Public | | | | | | | ✓ |
| OO FI 02 | Option to report on <10% assets | 🔒 | n/a | | | | | | | ✓ |
| OO FI 03 | Breakdown by market and credit quality | ✓ | Public | | | | | | | ✓ |
| OO SAM 01 | Breakdown by passive, quantitative, fundamental and other active strategies | 🔒 | n/a | | | | | | | ✓ |
| OO PE 01 | Breakdown of investments by strategy | 🔒 | n/a | | | | | | | ✓ |
| OO PE 02 | Typical level of ownership | 🔒 | n/a | | | | | | | ✓ |
| OO PR 01 | Breakdown of investments | ✓ | Public | | | | | | | ✓ |
| OO PR 02 | Breakdown of assets by management | ✓ | Public | | | | | | | ✓ |
| OO PR 03 | Largest property types | ✓ | Public | | | | | | | ✓ |
| OO INF 01 | Breakdown of investments | 🔒 | n/a | | | | | | | ✓ |
| OO INF 02 | Breakdown of assets by management | 🔒 | n/a | | | | | | | ✓ |
| OO INF 03 | Largest infrastructure | 🔒 | n/a | | | | | | | ✓ |
| OO End | Module confirmation page | ✓ | - | | | | | | | |

| CCStrategy and Governance | | | | Principle | | | | | | General |
|---------------------------|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| SG 01 | RI policy and coverage | ✓ | Public | | | | | | | ✓ |
| SG 02 | Publicly available RI policy or guidance documents | ✓ | Public | | | | | | | ✓ |
| SG 03 | Conflicts of interest | ✓ | Public | | | | | | | ✓ |
| SG 04 | Identifying incidents occurring within portfolios | ✓ | Public | | | | | | | ✓ |
| SG 05 | RI goals and objectives | ✓ | Public | | | | | | | ✓ |
| SG 06 | Main goals/objectives this year | ✓ | Public | | | | | | | ✓ |
| SG 07 | RI roles and responsibilities | ✓ | Public | | | | | | | ✓ |
| SG 07 CC | Climate-issues roles and responsibilities | ✓ | Public | | | | | | | ✓ |
| SG 08 | RI in performance management, reward and/or personal development | ✓ | Public | | | | | | | ✓ |
| SG 09 | Collaborative organisations / initiatives | ✓ | Public | | | | ✓ | ✓ | | |
| SG 09.2 | Assets managed by PRI signatories | 🔒 | n/a | ✓ | | | | | | |
| SG 10 | Promoting RI independently | ✓ | Public | | | | ✓ | | | |
| SG 11 | Dialogue with public policy makers or standard setters | ✓ | Public | | | | ✓ | ✓ | ✓ | |
| SG 12 | Role of investment consultants/fiduciary managers | ✓ | Public | | | | ✓ | | | |
| SG 13 | ESG issues in strategic asset allocation | ✓ | Public | ✓ | | | | | | |
| SG 14 | Long term investment risks and opportunity | ✓ | Public | ✓ | | | | | | |
| SG 15 | Allocation of assets to environmental and social themed areas | ✓ | Public | ✓ | | | | | | |
| SG 16 | ESG issues for internally managed assets not reported in framework | 🔒 | n/a | | | | | | | ✓ |
| SG 17 | ESG issues for externally managed assets not reported in framework | 🔒 | n/a | | | | | | | ✓ |
| SG 18 | Innovative features of approach to RI | ✓ | Public | | | | | | | ✓ |
| SG 19 | Communication | ✓ | Public | | | | | | | ✓ |
| SG End | Module confirmation page | ✓ | - | | | | | | | |

| Direct - Listed Equity Incorporation | | | | Principle | | | | | | General |
|--------------------------------------|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| LEI 01 | Percentage of each incorporation strategy | ✓ | Public | ✓ | | | | | | |
| LEI 02 | Type of ESG information used in investment decision | ✓ | Public | ✓ | | | | | | |
| LEI 03 | Information from engagement and/or voting used in investment decision-making | ✓ | Public | ✓ | | | | | | |
| LEI 04 | Types of screening applied | 🔒 | n/a | ✓ | | | | | | |
| LEI 05 | Processes to ensure screening is based on robust analysis | 🔒 | n/a | ✓ | | | | | | |
| LEI 06 | Processes to ensure fund criteria are not breached | 🔒 | n/a | ✓ | | | | | | |
| LEI 07 | Types of sustainability thematic funds/mandates | 🔒 | n/a | ✓ | | | | | | |
| LEI 08 | Review ESG issues while researching companies/sectors | ✓ | Public | ✓ | | | | | | |
| LEI 09 | Processes to ensure integration is based on robust analysis | ✓ | Public | ✓ | | | | | | |
| LEI 10 | Aspects of analysis ESG information is integrated into | ✓ | Public | ✓ | | | | | | |
| LEI 11 | ESG issues in index construction | 🔒 | n/a | ✓ | | | | | | |
| LEI 12 | How ESG incorporation has influenced portfolio composition | ✓ | Public | ✓ | | | | | | |
| LEI 13 | Measurement of financial and ESG outcomes of ESG incorporation | ✓ | Public | ✓ | | | | | | |
| LEI 14 | Examples of ESG issues that affected your investment view / performance | ✓ | Public | ✓ | | | | | | |
| LEI End | Module confirmation page | ✓ | - | | | | | | | |

| Direct - Listed Equity Active Ownership | | | | Principle | | | | | | General |
|---|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| LEA 01 | Description of approach to engagement | 🔒 | n/a | | ✓ | | | | | |
| LEA 02 | Reasoning for interaction on ESG issues | 🔒 | n/a | ✓ | ✓ | ✓ | | | | |
| LEA 03 | Process for identifying and prioritising engagement activities | 🔒 | n/a | | ✓ | | | | | |
| LEA 04 | Objectives for engagement activities | 🔒 | n/a | | ✓ | | | | | |
| LEA 05 | Process for identifying and prioritising collaborative engagement | 🔒 | n/a | | ✓ | | | | | |
| LEA 06 | Objectives for engagement activities | 🔒 | n/a | | ✓ | | | | | |
| LEA 07 | Role in engagement process | 🔒 | n/a | | ✓ | | ✓ | | | |
| LEA 08 | Monitor / discuss service provider information | 🔒 | n/a | | ✓ | | | | ✓ | |
| LEA 09 | Share insights from engagements with internal/external managers | 🔒 | n/a | ✓ | ✓ | | | | | |
| LEA 10 | Tracking number of engagements | 🔒 | n/a | | ✓ | | | | | |
| LEA 11 | Number of companies engaged with, intensity of engagement and effort | 🔒 | n/a | | ✓ | | | | | |
| LEA 12 | Engagement methods | 🔒 | n/a | | ✓ | | | | | |
| LEA 13 | Companies changing practices / behaviour following engagement | 🔒 | n/a | | ✓ | | | | | |
| LEA 14 | Examples of ESG engagements | 🔒 | n/a | | ✓ | | | | | |
| LEA 15 | Voting policy & approach | ✓ | Public | ✓ | ✓ | ✓ | | | | |
| LEA 16 | Typical approach to (proxy) voting decisions | ✓ | Public | | ✓ | | | | | |
| LEA 17 | Percentage of voting recommendations reviewed | 🔒 | n/a | | ✓ | | | | | |
| LEA 18 | Confirmation of votes | - | n/a | | ✓ | | | | | |
| LEA 19 | Securities lending programme | ✓ | Public | | ✓ | | | | | |
| LEA 20 | Informing companies of the rationale of abstaining/voting against management | ✓ | Public | | ✓ | | | | | |
| LEA 21 | Percentage of (proxy) votes cast | ✓ | Public | | ✓ | | | | | |
| LEA 22 | Proportion of ballot items that were for/against/abstentions | ✓ | Public | | ✓ | | | | | |
| LEA 23 | Shareholder resolutions | ✓ | Public | | ✓ | | | | | |
| LEA 24 | Examples of (proxy) voting activities | - | n/a | | ✓ | | | | | |
| LEA End | Module confirmation page | ✓ | - | | | | | | | |

| Direct - Fixed Income | | | | Principle | | | | | | General |
|-----------------------|---|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| FI 01 | Incorporation strategies applied | ✓ | Public | ✓ | | | | | | |
| FI 02 | ESG issues and issuer research | ✓ | Public | ✓ | | | | | | |
| FI 03 | Processes to ensure analysis is robust | ✓ | Public | ✓ | | | | | | |
| FI 04 | Types of screening applied | ✓ | Public | ✓ | | | | | | |
| FI 05 | Negative screening - overview and rationale | ✓ | Public | ✓ | | | | | | |
| FI 06 | Examples of ESG factors in screening process | ✓ | Public | ✓ | | | | | | |
| FI 07 | Screening - ensuring criteria are met | ✓ | Public | ✓ | | | | | | |
| FI 08 | Thematic investing - overview | ✓ | Public | ✓ | | | | | | |
| FI 09 | Thematic investing - themed bond processes | ✓ | Public | ✓ | | | | | | |
| FI 10 | Thematic investing - assessing impact | ✓ | Public | ✓ | | | | | | |
| FI 11 | Integration overview | ✓ | Public | ✓ | | | | | | |
| FI 12 | Integration - ESG information in investment processes | ✓ | Public | ✓ | | | | | | |
| FI 13 | Integration - E,S and G issues reviewed | ✓ | Public | ✓ | | | | | | |
| FI 14 | ESG incorporation in passive funds | 🔒 | n/a | ✓ | | | | | | |
| FI 15 | Engagement overview and coverage | ✓ | Public | | ✓ | | | | | |
| FI 16 | Engagement method | ✓ | Public | ✓ | ✓ | | | | | |
| FI 17 | Engagement policy disclosure | ✓ | Public | ✓ | ✓ | | | | | |
| FI 18 | Financial/ESG performance | ✓ | Public | | | | | | | ✓ |
| FI 19 | Examples - ESG incorporation or engagement | - | n/a | ✓ | ✓ | | | | | |
| FI End | Module confirmation page | ✓ | - | | | | | | | |

| Assurance | | | | Principle | | | | | | General |
|-----------------|------------------------------------|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| CM1 01.1 | Assurance, verification, or review | ✓ | Public | | | | | | | ✓ |
| CM1 01.2 & 01.8 | Assurance of this year's PRI data | ✓ | Public | | | | | | | |
| CM1 01.3 & 01.9 | Assurance of last year's PRI data | ✓ | Public | | | | | | | ✓ |
| CM1 01.4, 10-12 | Other confidence building measures | ✓ | Public | | | | | | | ✓ |
| CM1 01.5 | External assurance | 🔒 | n/a | | | | | | | ✓ |
| CM1 01.6 | Assurance or internal audit | 🔒 | n/a | | | | | | | ✓ |
| CM1 01.7 | Internal verification | 🔒 | n/a | | | | | | | ✓ |
| CM1 01 End | Module confirmation page | ✓ | - | | | | | | | |

Bancolombia

Reported Information

Public version

Organisational Overview

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Basic information

| | | | | |
|-------|-----------|--------|-----------------|---------|
| OO 01 | Mandatory | Public | Gateway/Peering | General |
|-------|-----------|--------|-----------------|---------|

OO 01.1 Select the services and funds you offer

Fund management

% of assets under management (AUM) in ranges

- <10%
- 10-50%
- >50%

- Fund of funds, manager of managers, sub-advised products
- Other, specify

Further options for investment managers (may be selected in addition to the above)

- Execution and advisory services
- Hedge funds
- Fund of hedge funds

| | | | | |
|-------|-----------|--------|---------|---------|
| OO 02 | Mandatory | Public | Peering | General |
|-------|-----------|--------|---------|---------|

OO 02.1 Select the location of your organisation's headquarters.

Colombia

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

49187

| | | | | |
|-------|-----------|--------|-------------|---------|
| OO 03 | Mandatory | Public | Descriptive | General |
|-------|-----------|--------|-------------|---------|

OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

OO 04

Mandatory

Public

Gateway/Peering

General

OO 04.1

Indicate the year end date for your reporting year.

31/12/2017

OO 04.2

Indicate your total AUM at the end of your reporting year, Exclude subsidiaries you have chosen not to report on and any advisory/execution only assets.

| | trillions | billions | millions | thousands | hundreds |
|---------------|-----------|----------|----------|-----------|----------|
| Total AUM | 32 | 995 | 125 | 439 | 278 |
| Currency | COP | | | | |
| Assets in USD | | 10 | 977 | 292 | 544 |

OO 06

Mandatory

Public

Descriptive

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

OO 06.1

Select how you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

| | Internally managed (%) | Externally managed (%) |
|----------------|------------------------|------------------------|
| Listed equity | <10% | 0 |
| Fixed income | >50% | 0 |
| Private equity | 0 | 0 |
| Property | <10% | 0 |
| Infrastructure | 0 | 0 |
| Commodities | 0 | 0 |
| Hedge funds | 0 | 0 |

| | | |
|--------------------|--------|---|
| Forestry | 0 | 0 |
| Farmland | 0 | 0 |
| Inclusive finance | 0 | 0 |
| Cash | 10-50% | 0 |
| Other (1), specify | <10% | 0 |
| Other (2), specify | <10% | 0 |

| | |
|--|-----------------------|
| | 'Other (1)' specified |
|--|-----------------------|

ETFs

| | |
|--|-----------------------|
| | 'Other (2)' specified |
|--|-----------------------|

Mutual Funds

| | |
|----------------|---|
| OO 06.2 | Publish asset class mix as per attached image [Optional]. |
|----------------|---|

| | | | | |
|--------------|--|---------------|----------------|----------------|
| OO 07 | Mandatory to Report Voluntary to Disclose | Public | Gateway | General |
|--------------|--|---------------|----------------|----------------|

| | |
|----------------|--|
| OO 07.1 | Provide to the nearest 5% the percentage breakdown of your Fixed Income AUM at the end of your reporting year, using the following categories. |
|----------------|--|

| | | |
|---------------------------|---------------------------|------|
| Internally managed | SSA | 30 |
| | Corporate (financial) | 60 |
| | Corporate (non-financial) | 10 |
| | Securitised | 0 |
| | Total | 100% |

| | | | | |
|--------------|--|---------------|----------------|----------------|
| OO 09 | Mandatory to Report Voluntary to Disclose | Public | Peering | General |
|--------------|--|---------------|----------------|----------------|

OO 09.1 Indicate the breakdown of your organisation's AUM by market.

| | |
|--------------------------------------|--|
| Developed Markets | <input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50 % |
| Emerging, Frontier and Other Markets | <input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50 % |
| Total | 100% |

Asset class implementation gateway indicators

| | | | | |
|--------------|------------------|---------------|----------------|----------------|
| OO 10 | Mandatory | Public | Gateway | General |
|--------------|------------------|---------------|----------------|----------------|

OO 10.1 Select the active ownership activities your organisation implemented in the reporting year.

Listed equity – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

OO 10.2

Indicate why you do not engage and do not require external managers to engage.

We are currently developing the process for ESG engagement.

Listed equity – voting

- We cast our (proxy) votes directly or via dedicated voting providers
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

Fixed income SSA – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We have currently not considered to engage on ESG issues with these investees

Fixed income Corporate (financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Fixed income Corporate (non-financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We have currently not considered to engage on ESG issues with these investees

OO 11

Mandatory

Public

Gateway

General

OO 11.1

Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Listed equity

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - SSA

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (non-financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Property

- We address ESG incorporation.
- We do not do ESG incorporation.

Cash

- We address ESG incorporation.
- We do not do ESG incorporation.

Other (1)

- We address ESG incorporation.
- We do not do ESG incorporation.

Other (2)

- We address ESG incorporation.
- We do not do ESG incorporation.

'Other (1)' [as defined in OO 05]

ETFs

'Other (2)' [as defined in OO 05]

Mutual Funds

| | | | | |
|-------|-----------|--------|---------|---------|
| OO 12 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|

OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules

- Organisational Overview
- Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

- Listed Equity incorporation

Direct - Listed Equity active ownership

- (Proxy) voting

Direct - Fixed Income

- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)

RI implementation via external managers

Closing module

- Closing module

Peering questions

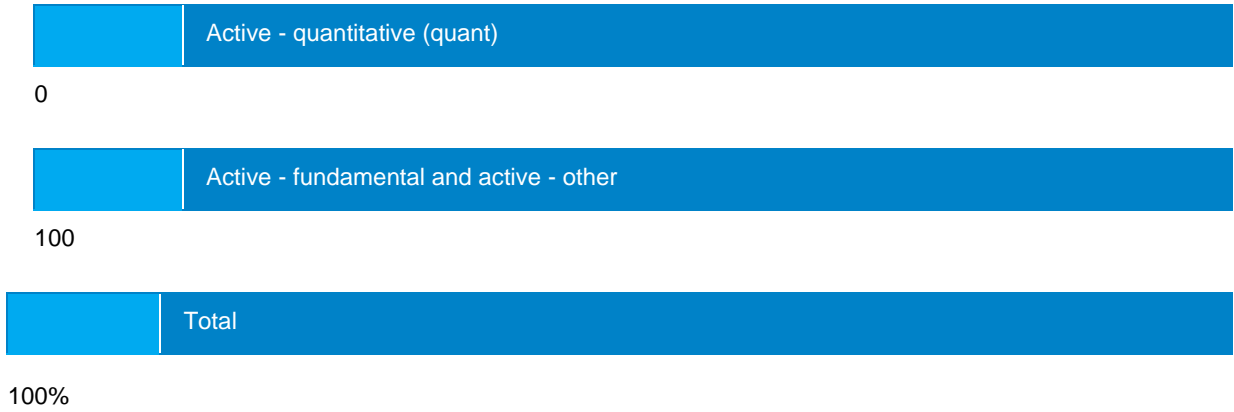
| | | | | |
|----------|---|--------|---------|---------|
| OO LE 01 | Mandatory to Report Voluntary to Disclose | Public | Gateway | General |
|----------|---|--------|---------|---------|

OO LE 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Percentage of internally managed listed equities

Passive

0



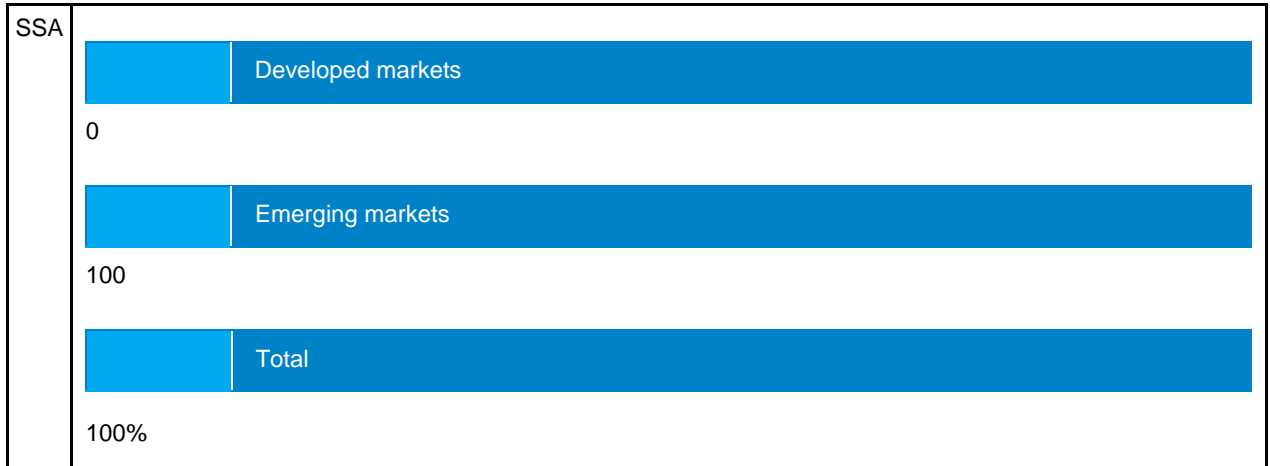
| | | | | |
|-----------------|--|---------------|----------------|----------------|
| OO FI 01 | Mandatory to Report Voluntary to Disclose | Public | Gateway | General |
|-----------------|--|---------------|----------------|----------------|

| | |
|-------------------|---|
| OO FI 01.1 | Provide a breakdown of your internally managed fixed income securities by active and passive strategies |
|-------------------|---|

| | |
|----------------------------------|--|
| SSA | <p>Passive 0</p> <p>Active - quantitative (quant) 20</p> <p>Active - fundamental and active - other 80</p> <p>Total 100%</p> |
| Corporate (financial) | <p>Passive 0</p> <p>Active - quantitative (quant) 0</p> <p>Active - fundamental and active - other 100</p> <p>Total 100%</p> |
| Corporate (non-financial) | <p>Passive 0</p> <p>Active - quantitative (quant) 0</p> <p>Active - fundamental and active - other 100</p> <p>Total 100%</p> |

| | | | | |
|----------|---|--------|-------------|---------|
| OO FI 03 | Mandatory to Report Voluntary to Disclose | Public | Descriptive | General |
|----------|---|--------|-------------|---------|

OO FI 03.1 Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.



| | | | | |
|----------|---|--------|-------------|---------|
| OO PR 01 | Mandatory to Report Voluntary to Disclose | Public | Descriptive | General |
|----------|---|--------|-------------|---------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

OO PR 01.1 Indicate the level of ownership you typically hold in your property investments.

- a majority stake (>50%)
- a 50% stake
- a significant minority stake (between 10-50%)
- a limited minority stake (<10%)
- a mix of ownership stakes
- N/A, we manage properties, new constructions and/or refurbishments on behalf of our clients, but do not hold equity in property on their behalf

OO PR 01.2 Provide a breakdown of your organisations allocation to Real Estate Investment Trusts (REITs) or similar

- >50%
- 10 – 50%
- <10%
- 0%

| | | | | |
|----------|---|--------|---------|---------|
| OO PR 02 | Mandatory to Report Voluntary to Disclose | Public | Gateway | General |
|----------|---|--------|---------|---------|

**OO PR
02.1**

Provide a breakdown of your organisation's property assets based on who manages the assets.

| Property assets managed by | Breakdown of your property assets (by number) |
|--|---|
| Managed directly by your organisation | <input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0% |
| Managed via third-party property managers appointed by you | <input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0% |
| Managed by other investors or their property managers | <input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0% |
| Managed by tenant(s) with operational control | <input type="radio"/> > 50% <input type="radio"/> 10-50% <input type="radio"/> < 10% <input checked="" type="radio"/> 0% |
| Total | 100% |

| | | | | |
|-----------------|------------------|---------------|--------------------|----------------|
| OO PR 03 | Voluntary | Public | Descriptive | General |
|-----------------|------------------|---------------|--------------------|----------------|

| | |
|-----------------------|---|
| OO PR 03.1 | Indicate up to three of your largest property types by AUM. |
|-----------------------|---|

| Types | Main property types (by AUM) |
|------------------------------|--|
| Largest property type | <input type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input checked="" type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify |
| Second largest property type | <input type="radio"/> Industrial <input checked="" type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input type="radio"/> Mixed use <input type="radio"/> Other, specify |
| Third largest property type | <input type="radio"/> Industrial <input type="radio"/> Retail <input type="radio"/> Office <input type="radio"/> Residential <input type="radio"/> Leisure/Hotel <input checked="" type="radio"/> Mixed use <input type="radio"/> Other, specify |

Bancolombia

Reported Information

Public version

Strategy and Governance

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Investment policy

SG 01

Mandatory

Public

Core Assessed

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

| Policy components/types | Coverage by AUM |
|--|--|
| <input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Engagement policy <input type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2) | <input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM |

SG 01.3

Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change and related issues
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

| | |
|----------------|--|
| SG 01.4 | Describe your organisation's investment principles and overall investment strategy, and how they consider ESG factors and real economy impact. |
|----------------|--|

In Bancolombia, we manage important financial resources not only for proprietary trading but also for flow trading throughout consortiums and collective and individual portfolios. Throughout our financial activity we are able to invest directly on companies and we may also advise our clients in their investment decisions. Currently, sustainability criteria are crucial for the successful development of companies' activities, as they guarantee a greater social, environmental and economic long term value generation for our stakeholders.

As institutional investors, we must act towards a greater long-term value generation for our stakeholders. In this fiduciary function, we estimate that environmental, social and corporate governance matters may affect the performance of portfolios (in a different degree depending on the company, sector, region, kind of assets, and moment). We also recognize that the application of this policy aids to act consequently to wider social objectives. Consequently, to the extent that is compatible with our fiduciary responsibilities.

No

| | | | | |
|--------------|------------------|---------------|----------------------|--------------|
| SG 02 | Mandatory | Public | Core Assessed | PRI 6 |
|--------------|------------------|---------------|----------------------|--------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|----------------|--|
| SG 02.1 | Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document. |
|----------------|--|

Policy setting out your overall approach

| | |
|--|----------------|
| | URL/Attachment |
|--|----------------|

URL

| | |
|--|-----|
| | URL |
|--|-----|

<https://www.grupobancolombia.com/wps/wcm/connect/0087e82f-0e04-44f5-954f-0cf443f4c94b/ResponsibleInvestmentPolicy.pdf?MOD=AJPERES&CVID=I3ZavkT>

Attachment (will be made public)

Screening / exclusions policy

| | |
|--|----------------|
| | URL/Attachment |
|--|----------------|

URL

| | |
|--|-----|
| | URL |
|--|-----|

<https://www.grupobancolombia.com/wps/wcm/connect/0087e82f-0e04-44f5-954f-0cf443f4c94b/ResponsibleInvestmentPolicy.pdf?MOD=AJPERES&CVID=I3ZavkT>

Attachment (will be made public)

We do not publicly disclose our investment policy documents

SG 02.2

Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

URL

URL

<https://www.grupobancolombia.com/wps/wcm/connect/0087e82f-0e04-44f5-954f-0cf443f4c94b/ResponsibleInvestmentPolicy.pdf?MOD=AJPERES&CVID=I3ZavkT>

Attachment

We do not publicly disclose any investment policy components

SG 02.3

Indicate if your organisation's investment principles, and overall investment strategy is publicly available

Yes

No

SG 03**Mandatory****Public****Core Assessed****General****SG 03.1**

Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2

Describe your policy on managing potential conflicts of interest in the investment process.

In Bancolombia's ethics code there is an entire section regarding conflicts of interest, sopecifically regarding the investment process, a conflict of interes is defined as Taking part in any asset acquisition or investment decision for Grupo Bancolombia, when the employee's spouse or relatives or companies where they have participation are the suppliers of said asset.

No

SG 04**Voluntary****Public****Descriptive****General****SG 04.1**

Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.

Yes

No

Objectives and strategies

| | | | | |
|-------|-----------|--------|-----------------------|---------|
| SG 05 | Mandatory | Public | Gateway/Core Assessed | General |
|-------|-----------|--------|-----------------------|---------|

SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

| | | | | |
|-------|-----------|--------|-------------|---------|
| SG 06 | Voluntary | Public | Descriptive | General |
|-------|-----------|--------|-------------|---------|

SG 06.1 List the main responsible investment objectives that your organisation set for the reporting year.

Responsible investment processes

- Provide training on ESG incorporation
- Provide training on ESG engagement
- Improved communication of ESG activities within the organisation
- Improved engagement to encourage change with regards to management of ESG issues
- Improved ESG incorporation into investment decision making processes

Key performance indicator

The creation of an ESG specific investment product, and the creation of the internal ESG team Structure.

Progress achieved

The creation of an ESG specific investment product, and the creation of the internal ESG team Structure.

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Financial performance of investments

- Increase portfolio performance by consideration of ESG factors
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

ESG characteristics of investments

- Over or underweight companies based on ESG characteristics
- Improve ESG ratings of portfolio
- Setting carbon reduction targets for portfolio
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Other activities

- Joining and/or participation in RI initiatives

Key performance indicator

Working alongside other investment companies in latin america to structure the LatinSIF which now will be working with PRI.

Progress achieved

Creation of the steering committee of companies that will work with PRI on the definition of activities to promote RI in latin america.

- Encouraging others to join a RI initiative
- Documentation of best practice case studies
- Using case studies to demonstrate engagement and ESG incorporation to clients
- Other, specify (1)
- Other, specify (2)
- Other, specify (3)

Governance and human resources

| | | | | |
|-------|-----------|--------|---------------|---------|
| SG 07 | Mandatory | Public | Core Assessed | General |
|-------|-----------|--------|---------------|---------|

| | |
|---------|---|
| SG 07.1 | Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment. |
|---------|---|

Roles present in your organisation

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - Head of Sustainability**
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- ESG portfolio manager
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- External managers or service providers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
- Other role, specify (1)
- Other role, specify (2)

SG 07.3

Indicate the number of dedicated responsible investment staff your organisation has.

Number

4

| | | | | |
|--------------|------------------|---------------|----------------------------|----------------|
| SG 08 | Voluntary | Public | Additional Assessed | General |
|--------------|------------------|---------------|----------------------------|----------------|

| | |
|----------------|---|
| SG 08.1 | Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element. |
|----------------|---|

Board members/Board of trustees

- Responsible investment included in personal development and/or training plan
- None of the above

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Other C-level staff or head of department

Head of Sustainability

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Portfolio managers

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Investment analysts

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Dedicated responsible investment staff

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- Responsible investment included in personal development and/or training plan
- None of the above

Promoting responsible investment

| | | | | |
|-------|-----------|--------|---------------|---------|
| SG 09 | Mandatory | Public | Core Assessed | PRI 4,5 |
|-------|-----------|--------|---------------|---------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|---------|---|
| SG 09.1 | Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played. |
|---------|---|

Select all that apply

- Principles for Responsible Investment

| | |
|--|--|
| | Your organisation's role in the initiative during the reporting period (see definitions) |
|--|--|

- Basic
- Moderate
- Advanced
- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- EVCA – Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced
- United Nations Global Compact

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced
- Other collaborative organisation/initiative, specify
LatinSIF

Your organisation's role in the initiative during the reporting year (see definitions)

- Basic
- Moderate
- Advanced
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

| | | | | |
|--------------|------------------|---------------|----------------------|--------------|
| SG 10 | Mandatory | Public | Core Assessed | PRI 4 |
|--------------|------------------|---------------|----------------------|--------------|

SG 10.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

- Yes

SG 10.2 Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment

Description

During 2017 we publicly spoke at various venues regarding our responsible investment strategy.

Frequency of contribution

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad hoc
 - Other
- Wrote and published in-house research papers on responsible investment

Description

In the "Capital Inteligente" magazine we published an article on the business case for RI

Frequency of contribution

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad hoc
 - Other
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify

Description

Latin American Working group

Frequency of contribution

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad hoc
 - Other
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify
- No

| | | | | |
|--------------|------------------|---------------|----------------------------|------------------|
| SG 11 | Voluntary | Public | Additional Assessed | PRI 4,5,6 |
|--------------|------------------|---------------|----------------------------|------------------|

| | |
|----------------|---|
| SG 11.1 | Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year. |
|----------------|---|

- Yes
- No

| | |
|--|----------------|
| | Please explain |
|--|----------------|

There was not an occasion for us to engage on the issue

Outsourcing to fiduciary managers and investment consultants

| | | | | |
|--------------|------------------|---------------|----------------------|--------------|
| SG 12 | Mandatory | Public | Core Assessed | PRI 4 |
|--------------|------------------|---------------|----------------------|--------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|----------------|---|
| SG 12.1 | Indicate whether your organisation uses investment consultants. |
|----------------|---|

- Yes, we use investment consultants
- No, we do not use investment consultants.

ESG issues in asset allocation

| | | | | |
|--------------|------------------|---------------|--------------------|--------------|
| SG 13 | Mandatory | Public | Descriptive | PRI 1 |
|--------------|------------------|---------------|--------------------|--------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|----------------|--|
| SG 13.1 | Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated. |
|----------------|--|

- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities
- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

| | | | | |
|--------------|--|---------------|----------------------------|--------------|
| SG 14 | Mandatory to Report Voluntary to Disclose | Public | Additional Assessed | PRI 1 |
|--------------|--|---------------|----------------------------|--------------|

| | |
|----------------|--|
| SG 14.1 | Describe the process used to identify short, medium and long-term risks and opportunities that could have a material impact on your organisation and its activities. |
|----------------|--|

there currently is no established and documented process to identify such risks and opportunities associated with ESG

| | |
|----------------|--|
| SG 14.2 | Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on. |
|----------------|--|

- Changing demographics
- Climate change and related issues
- Resource scarcity
- Technology developments
- Other, specify(1)
- Other, specify(2)
- None of the above

| | |
|--|------------------------|
| | Please explain why not |
|--|------------------------|

there is currently a lack of available information to conduct the necessary analysis to conduct these actions.

| | | | | |
|--------------|--|---------------|--------------------|--------------|
| SG 15 | Mandatory to Report Voluntary to Disclose | Public | Descriptive | PRI 1 |
|--------------|--|---------------|--------------------|--------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|----------------|---|
| SG 15.1 | Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas. |
|----------------|---|

- Yes
- No

| | | | | |
|-------------------|--|--|--|--|
| Innovation | | | | |
|-------------------|--|--|--|--|

| | | | | |
|--------------|------------------|---------------|--------------------|----------------|
| SG 18 | Voluntary | Public | Descriptive | General |
|--------------|------------------|---------------|--------------------|----------------|

| | |
|----------------|--|
| SG 18.1 | Indicate whether any specific features of your approach to responsible investment are particularly innovative. |
|----------------|--|

- Yes

SG 18.2

Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

Bancolombia is the first company in Colombia to adhere to the Principles for Responsible Investment, additionally we are part of the Steering Committee of the LatinSIF initiative where we play a leading role alongside other investment companies and the Colombian Stock Exchange to promote and generate a Forum for RI in Colombia.

Furthermore, we are the first company in Colombia to launch an ESG delegated portfolio.

No

Communication

SG 19

Mandatory

Public

Core Assessed

PRI 6

SG 19.1

Indicate whether your organisation proactively discloses asset class specific information. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Fixed income

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

Listed equity – (Proxy) Voting

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

Bancolombia

Reported Information

Public version

Direct - Listed Equity Incorporation

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ESG incorporation in actively managed listed equities

Implementation processes

LEI 01

Mandatory

Public

Core Assessed

PRI 1


New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEI 01.1


Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)

ESG incorporation strategy (select all that apply)

- Screening alone (i.e. not combined with any other strategies)
- Thematic alone (i.e. not combined with any other strategies)
- Integration alone (i.e. not combined with any other strategies)

| | |
|---|--|
| Percentage of active listed equity to which the strategy is applied |  90 |
|---|--|

- Screening and integration strategies
- Thematic and integration strategies
- Screening and thematic strategies
- All three strategies combined
- We do not apply incorporation strategies

| | |
|--|--|
| Percentage of active listed equity to which no strategy is applied |  10 |
|--|--|

Total actively managed listed equities

100%

LEI 01.2

Describe your organisation's approach to incorporation and the reasons for choosing the particular ESG incorporation strategy/strategies.

It is the first part of the process we are developing for this asset class. Lack of public ESG information is a great limitation in local markets. Currently we only incorporate Governance performance for Listed Equity.

| | | | | |
|--------|-----------|--------|---------------------|-------|
| LEI 02 | Voluntary | Public | Additional Assessed | PRI 1 |
|--------|-----------|--------|---------------------|-------|

| | |
|----------|---|
| LEI 02.1 | Indicate what ESG information you use in your ESG incorporation strategies and who provides this information. |
|----------|---|

Type of ESG information

- Raw ESG company data
- Company-related analysis or ratings
- Sector-related analysis or ratings
- Country-related analysis or ratings
- Screened stock list
- ESG issue-specific analysis or ratings

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – analyst or portfolio manager
- Other, specify

| | |
|----------|--|
| LEI 02.2 | Provide a brief description of the ESG information used, highlighting any different sources of information across your ESG incorporation strategies. |
|----------|--|

for Listed equity we use public information regarding Governance practices.

| | |
|----------|--|
| LEI 02.3 | Indicate if you incentivise brokers to provide ESG research. |
|----------|--|

- Yes
- No

| | | | | |
|--------|-----------|--------|---------------------|-------|
| LEI 03 | Voluntary | Public | Additional Assessed | PRI 1 |
|--------|-----------|--------|---------------------|-------|

| | |
|----------|---|
| LEI 03.1 | Indicate if your organisation has a process through which information derived from ESG engagement and/or (proxy) voting activities is made available for use in investment decision-making. |
|----------|---|

- (Proxy) voting
 - We have a systematic process to ensure the information is made available.
 - We occasionally make this information available.
 - We do not make this information available.

(C) Implementation: Integration of ESG issues

| | | | | |
|--------|-----------|--------|---------------|-------|
| LEI 08 | Mandatory | Public | Core Assessed | PRI 1 |
|--------|-----------|--------|---------------|-------|

LEI 08.1

Indicate which ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.

| ESG issues | Proportion impacted by analysis |
|----------------------|--|
| Environmental | <div style="border: 1px solid black; background-color: #0070C0; color: white; padding: 2px;">Environmental</div> <p> <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90% </p> |
| Social | <div style="border: 1px solid black; background-color: #0070C0; color: white; padding: 2px;">Social</div> <p> <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90% </p> |
| Corporate Governance | <div style="border: 1px solid black; background-color: #0070C0; color: white; padding: 2px;">Corporate Governance</div> <p> <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90% </p> |

LEI 09**Voluntary****Public****Additional Assessed****PRI 1****LEI 09.1**

Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly.
- A periodic review of the internal research is carried out

LEI 09.4

Indicate how frequently you review internal research that builds your ESG integration strategy.

- Quarterly or more frequently
 - Bi-Annually
 - Annually
 - Less frequently than annually
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Other, specify
- None of the above

LEI 09.5

Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

LEI 10

Mandatory to Report Voluntary to Disclose

Public

Core Assessed

PRI 1

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEI 10.1

Indicate which aspects of investment analysis you integrate material ESG information into.

- Economic analysis
- Industry analysis
- Quality of management
- Analysis of company strategy
- Portfolio weighting
- Fair value/fundamental analysis

Proportion of actively managed listed equity exposed to investment analysis

- <10%
- 11-50%
- 51-90%
- 90%

LEI 10.2b | Indicate which methods are part of your process to integrate ESG information into fair value/fundamental analysis and/or portfolio construction.

- Adjustments to forecasted company financials (sales, operating costs, earnings, cash flows)
- Adjustments to valuation tools (discount rates, terminal value)
- Other adjustments to fair value projections, specify

LEI 10.4b | Describe the methods you have used to adjust the income forecast / valuation tool

A "haircut" is applied to the fair value based on the issuers Governance performance.

- Other, specify

Outputs and outcomes

| | | | | |
|---------------|------------------|---------------|--------------------|--------------|
| LEI 12 | Voluntary | Public | Descriptive | PRI 1 |
|---------------|------------------|---------------|--------------------|--------------|

LEI 12.1 | Indicate how your ESG incorporation strategies have influenced the composition of your portfolio(s) or investment universe.

- Integration of ESG issues

Select which of these effects followed your ESG integration:

- Reduce or prioritise the investment universe
- Overweight/underweight at sector level
- Overweight/underweight at stock level
- Buy/sell decisions
- Other, specify
- None of the above

| | | | | |
|---------------|------------------|---------------|----------------------------|--------------|
| LEI 13 | Voluntary | Public | Additional Assessed | PRI 1 |
|---------------|------------------|---------------|----------------------------|--------------|

LEI 13.1 | Indicate whether your organisation measures how your approach to responsible investment in Listed Equity has affected your portfolio's financial and/or ESG performance.

- We measure whether our approach to ESG issues impacts funds' reputation
- We measure whether our approach to ESG issues impacts funds' financial performance: return
- We measure whether our approach to ESG issues impacts funds' financial performance: risk
- We measure whether our approach to ESG issues impacts funds' ESG performance
- None of the above

| | | | | |
|---------------|------------------|---------------|--------------------|--------------|
| LEI 14 | Voluntary | Public | Descriptive | PRI 1 |
|---------------|------------------|---------------|--------------------|--------------|

LEI 14.1

Provide examples of ESG issues that affected your investment view and/or performance during the reporting year.

ESG issue 1

| | |
|--|--|
| | ESG issue and explanation |
| Issues regarding fines associated with anti monopoly laws. | |
| | ESG incorporation strategy applied |
| <input checked="" type="checkbox"/> Integration | |
| | Impact on investment decision or performance |
| The stock was underweighted. | |

ESG issue 2

ESG issue 3

ESG issue 4

ESG issue 5

Bancolombia

Reported Information

Public version

Direct - Listed Equity Active Ownership

PRI disclaimer

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(Proxy) voting and shareholder resolutions

Overview

| | | | | |
|--------|-----------|--------|---------------|-----------|
| LEA 15 | Mandatory | Public | Core Assessed | PRI 1,2,3 |
|--------|-----------|--------|---------------|-----------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|----------|--|
| LEA 15.1 | Indicate whether your organisation has a formal voting policy. |
|----------|--|

Yes

| | |
|----------|--|
| LEA 15.2 | Indicate what your voting policy covers: |
|----------|--|

- Conflicts of interest
- Share blocking
- Securities lending process
- Prioritisation of voting activities
- Decision making processes
- Environmental factors
- Social factors
- Governance factors
- Filing/co-filing resolutions
- Extraordinary meetings
- Regional voting practices
- Transparency of proxy voting activities
- Company dialogue pre/post vote
- Other, describe
- None of the above

No

Process

| | | | | |
|--------|-----------|--------|-------------|-------|
| LEA 16 | Mandatory | Public | Descriptive | PRI 2 |
|--------|-----------|--------|-------------|-------|

| | |
|----------|--|
| LEA 16.1 | Indicate how you typically make your (proxy) voting decisions. |
|----------|--|

| |
|----------|
| Approach |
|----------|

We use our own research or voting team and make voting decisions without the use of service providers.

Based on

- our own voting policy
- our clients' requests or policy
- other, explain

We hire service provider(s) that make voting recommendations or provide research that we use to inform our voting decisions.

We hire service provider(s) that make voting decisions on our behalf, except for some pre-defined scenarios for which we review and make voting decisions.

We hire service provider(s) that make voting decisions on our behalf.

LEA 16.2 Provide an overview of how you ensure your voting policy is adhered to, giving details of your approach when exceptions to the policy are made (if applicable).

Attendees are instructed on how to vote on each of the issues in line with the voting policy

| | | | | |
|---------------|------------------|---------------|----------------------------|--------------|
| LEA 19 | Voluntary | Public | Additional Assessed | PRI 2 |
|---------------|------------------|---------------|----------------------------|--------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

LEA 19.1 Indicate if your organisation has a securities lending programme.

- Yes
- No

LEA 19.2 Describe why your organisation does not lend securities?

it is not covered by our attributions

| | | | | |
|---------------|------------------|---------------|----------------------|--------------|
| LEA 20 | Mandatory | Public | Core Assessed | PRI 2 |
|---------------|------------------|---------------|----------------------|--------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|-----------------|---|
| LEA 20.1 | Indicate whether you or the service providers acting on your behalf raise any concerns with companies ahead of voting |
|-----------------|---|

- Yes, in most cases
- Sometimes, in the following cases:
 - Votes for selected markets
 - Votes relating to certain ESG issues
 - Votes for significant shareholdings
 - Votes for companies we are engaging with
 - On request by clients
 - Other
- Neither we nor our service provider raise concerns with companies ahead of voting

| | |
|-----------------|---|
| LEA 20.2 | Indicate whether you and/or the service provider(s) acting on your behalf, communicate the rationale to companies, when , you abstain or vote against management recommendations. |
|-----------------|---|

- Yes, in most cases
- Sometimes, in the following cases.
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers do not abstain or vote against management recommendations

Outputs and outcomes

| | | | | |
|---------------|------------------|---------------|----------------------|--------------|
| LEA 21 | Mandatory | Public | Core Assessed | PRI 2 |
|---------------|------------------|---------------|----------------------|--------------|

| | |
|-----------------|--|
| LEA 21.1 | For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year. |
|-----------------|--|

- We do track or collect this information

| | |
|--|--------------------------------|
| | Votes cast (to the nearest 1%) |
|--|--------------------------------|

| | |
|--|---|
| | % |
|--|---|

100

| | |
|--|--|
| | Specify the basis on which this percentage is calculated |
|--|--|

- of the total number of ballot items on which you could have issued instructions
- of the total number of company meetings at which you could have voted
- of the total value of your listed equity holdings on which you could have voted

LEA 21.2 Explain your reason(s) for not voting certain holdings

- Shares were blocked
- Notice, ballots or materials not received in time
- Missed deadline
- Geographical restrictions (non-home market)
- Cost
- Conflicts of interest
- Holdings deemed too small
- Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- On request by clients
- Other

We do not track or collect this information

| | | | | |
|---------------|------------------|---------------|----------------------------|--------------|
| LEA 22 | Mandatory | Public | Additional Assessed | PRI 2 |
|---------------|------------------|---------------|----------------------------|--------------|

LEA 22.1 Indicate if you track the voting instructions that you and/or your service provider on your behalf have issued.

Yes, we track this information

LEA 22.2 Of the voting instructions that you and/or third parties on your behalf issued, indicate the proportion of ballot items that were:

| Voting instructions | Breakdown as percentage of votes cast |
|---|---|
| For (supporting) management recommendations | <div style="display: flex; align-items: center;"> <div style="width: 100px; height: 20px; background-color: #0072bc; margin-right: 10px;"></div> % </div> <p>100</p> |
| Against (opposing) management recommendations | <div style="display: flex; align-items: center;"> <div style="width: 100px; height: 20px; background-color: #0072bc; margin-right: 10px;"></div> % </div> <p>0</p> |
| Abstentions | <div style="display: flex; align-items: center;"> <div style="width: 100px; height: 20px; background-color: #0072bc; margin-right: 10px;"></div> % </div> <p>0</p> |

100%

LEA 22.3 Describe the actions you take in relation to voting against management recommendations.

N/A

No, we do not track this information

| | | | | |
|--------|-----------|--------|-------------|-------|
| LEA 23 | Voluntary | Public | Descriptive | PRI 2 |
|--------|-----------|--------|-------------|-------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|-----------------|---|
| LEA 23.1 | Indicate if your organisation directly or via a service provider filed or co-filed any ESG shareholder resolutions during the reporting year. |
|-----------------|---|

- Yes
- No

| | |
|-----------------|--|
| LEA 23.6 | Describe whether your organisation reviews ESG shareholder resolutions filed by other investors. |
|-----------------|--|

N/A

Bancolombia

Reported Information

Public version

Direct - Fixed Income

PRI disclaimer

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ESG incorporation in actively managed fixed income

Implementation processes

| FI 01 | Mandatory | Public | Gateway | PRI 1 |
|---------|---|--------|---------|-------|
| FI 01.1 | Indicate 1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and 2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to. | | | |

| | | |
|---------------------------|-------------------------------------|------|
| Corporate (financial) | Screening alone | 0 |
| | Thematic alone | 0 |
| | Integration alone | 0 |
| | Screening + integration strategies | 5 |
| | Thematic + integration strategies | 0 |
| | Screening + thematic strategies | 0 |
| | All three strategies combined | 0 |
| | No incorporation strategies applied | 95 |
| | | 100% |
| Corporate (non-financial) | Screening alone | 0 |
| | Thematic alone | 0 |
| | Integration alone | 0 |
| | Screening + integration strategies | 0 |

| | | |
|--|-------------------------------------|------|
| | Thematic + integration strategies | 5 |
| | Screening + thematic strategies | 0 |
| | All three strategies combined | 0 |
| | No incorporation strategies applied | 95 |
| | | 100% |

FI 01.2 Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

we use governance performance of issuers to integrate in current credit rating analysis, then we implement screening on the issuers with the lowest credit scores.

| | | | | |
|--------------|--|---------------|----------------------|--------------|
| FI 02 | Mandatory to Report Voluntary to Disclose | Public | Core Assessed | PRI 1 |
|--------------|--|---------------|----------------------|--------------|

FI 02.1 Indicate which ESG factors you systematically research as part of your analysis on issuers.

Select all that apply

| | Corporate (financial) | Corporate (non-financial) | |
|--------------------|-------------------------------------|-------------------------------------|--|
| Environmental data | <input type="checkbox"/> | <input type="checkbox"/> | |
| Social data | <input type="checkbox"/> | <input type="checkbox"/> | |
| Governance data | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |

FI 02.2 Indicate what format your ESG information comes in and where you typically source it

- Raw ESG company data
- ESG factor specific analysis
- Issuer-level ESG analysis

Indicate who provides this information

- ESG research provider
- Sell-side
- In-house – specialised ESG analyst or team
- In-house – FI analyst, PM or risk team
- Other, specify
- Sector-level ESG analysis
- Country-level ESG analysis

FI 02.3 Provide a brief description of the ESG information used, highlighting any differences in sources of information across your ESG incorporation strategies.

we obtain governance performance information from theCodigo País pole, where Colombian issuers have to disclose their governance practices.

| | | | | |
|--------------|------------------|---------------|----------------------------|--------------|
| FI 03 | Mandatory | Public | Additional Assessed | PRI 1 |
|--------------|------------------|---------------|----------------------------|--------------|

FI 03.1 Indicate how you ensure that your ESG research process is robust:

- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits of ESG research are undertaken in a systematic way
- ESG analysis is benchmarked for quality against other providers
- Other, specify
- None of the above

FI 03.2 Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is a standard item on all individual issuer summaries, ‘tear sheets’, ‘dashboards’ or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

(A) Implementation: Screening

| | | | | |
|--------------|------------------|---------------|----------------|--------------|
| FI 04 | Mandatory | Public | Gateway | PRI 1 |
|--------------|------------------|---------------|----------------|--------------|

FI 04.1 Indicate the type of screening you conduct.

Select all that apply

| | | | |
|----------------------------------|-------------------------------------|--|--|
| | Corporate (financial) | | |
| Negative/exclusionary screening | <input checked="" type="checkbox"/> | | |
| Positive/best-in-class screening | <input type="checkbox"/> | | |
| Norms-based screening | <input type="checkbox"/> | | |

FI 04.2 Describe your approach to screening for internally managed active fixed income

lowest scores of issuers in credit rating, which includes governance performance are excluded from the fund.

FI 05 **Mandatory** **Public** **Descriptive** **PRI 1**

Corporate (financial)

Corporate (fin)

- For legal reasons
- For non-legal reasons

FI 05.2 Describe your approach to ESG-based negative screening of issuers from your investable universe.

lowest scoring issuers in credit rating, which includes governance performance are excluded from the fund.

FI 06 **Voluntary** **Public** **Additional Assessed** **PRI 1**

FI 06.1 Provide examples of how ESG factors are included in your screening criteria.

- Example 1

| |
|---|
| Type of fixed income |
| <input checked="" type="checkbox"/> Corporate (financial) |
| ESG factors |
| <input type="checkbox"/> Environmental <input type="checkbox"/> Social <input checked="" type="checkbox"/> Governance |
| Screening |
| <input checked="" type="checkbox"/> Negative/ exclusionary |
| Description of how ESG factors are used as the screening criteria |
| <p>Issuers that dont have best practices according to the Codigo País poll, can have a lower credit score which finally will cause exclusion from the fund.</p> |

- Example 2
- Example 3
- Example 4
- Example 5

| | | | | |
|-------|-----------|--------|---------------|-------|
| FI 07 | Mandatory | Public | Core Assessed | PRI 1 |
|-------|-----------|--------|---------------|-------|

| | |
|---------|---|
| FI 07.1 | Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments. |
|---------|---|

| Type of screening | Checks |
|---|--|
| Negative/exclusionary screening? | <input type="checkbox"/> Checks are performed to ensure that issuers meet screening criteria <input type="checkbox"/> We ensure that data used for the screening criteria is updated at least every 2 years. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input type="checkbox"/> Audits of fund holdings are undertaken regularly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above |

(B) Implementation: Thematic

| | | | | |
|-------|---|--------|-------------|-------|
| FI 08 | Mandatory to Report Voluntary to Disclose | Public | Descriptive | PRI 1 |
|-------|---|--------|-------------|-------|

| | |
|---------|--|
| FI 08.1 | Indicate what proportion of your thematic investments are: |
|---------|--|

Green funds

| | |
|--|---|
| | % |
|--|---|

0

Social funds

| | |
|--|---|
| | % |
|--|---|

0

Sustainability bonds (combination of green and social)

| | |
|--|---|
| | % |
|--|---|

0

Other

| | |
|---------|--|
| FI 08.2 | Describe your organisation's approach to thematic fixed income investing |
|---------|--|

we do not have thematic ESg investments

| | | | | |
|-------|-----------|--------|---------------|-------|
| FI 09 | Mandatory | Public | Core Assessed | PRI 1 |
|-------|-----------|--------|---------------|-------|

| | |
|---------|--|
| FI 09.1 | Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines.. |
|---------|--|

- We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects
- We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated
- We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated
- We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects
- Other, specify
- None of the above

| | |
|---------|--|
| FI 09.2 | Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents. |
|---------|--|

N/A

| | | | | |
|-------|-----------|--------|---------------------|-------|
| FI 10 | Mandatory | Public | Additional Assessed | PRI 1 |
|-------|-----------|--------|---------------------|-------|

FI 10.1 | Indicate how you assess the environmental or social impact of your thematic investments

- We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments
- We ensure independent audits are conducted on the environmental or social impact of our investments
- We have a proprietary system to measure environmental and social impact
- We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights
- Other, specify
- None of the above

(C) Implementation: Integration

| | | | | |
|-------|-----------|--------|-------------|-------|
| FI 11 | Mandatory | Public | Descriptive | PRI 1 |
|-------|-----------|--------|-------------|-------|

FI 11.1 | Describe your approach to integrating ESG into traditional financial analysis.

Governance performance is integrated into current issuer credit ratings, then the companies with the lowest scores are excluded from the fund.

Corporate (financial)

Governance performance is integrated into current issuer credit ratings, then the companies with the lowest scores are excluded from the fund.

Corporate (non-financial)

Governance performance is integrated into current issuer credit ratings, then the companies with the lowest scores are excluded from the fund.

| | | | | |
|-------|-----------|--------|---------------|-------|
| FI 12 | Mandatory | Public | Core Assessed | PRI 1 |
|-------|-----------|--------|---------------|-------|

FI 12.1 | Indicate how ESG information is typically used as part of your investment process.

Select all that apply

| | Corporate (financial) | Corporate (non-financial) | |
|---|-------------------------------------|-------------------------------------|--|
| ESG analysis is integrated into fundamental analysis | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| ESG analysis is integrated into security weighting decisions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| ESG analysis is integrated into portfolio construction decisions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| ESG analysis is a standard part of internal credit ratings or assessment | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| ESG analysis for issuers is a standard agenda item at investment committee meetings | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| ESG analysis is regularly featured in internal research notes or similar | <input type="checkbox"/> | <input type="checkbox"/> | |
| ESG analysis is a standard feature of ongoing portfolio monitoring | <input type="checkbox"/> | <input type="checkbox"/> | |
| ESG analysis features in all internal issuer summaries or similar documents | <input type="checkbox"/> | <input type="checkbox"/> | |
| Other, specify | <input type="checkbox"/> | <input type="checkbox"/> | |

| | | | | |
|-------|-----------|--------|---------------------|-------|
| FI 13 | Mandatory | Public | Additional Assessed | PRI 1 |
|-------|-----------|--------|---------------------|-------|

FI 13.1 Indicate the extent to which ESG issues are reviewed in your integration process.

| | Environment | Social | Governance |
|---------------------------|---|--|--|
| Corporate (financial) | <div style="background-color: #0072bc; color: white; padding: 2px;">Environmental</div> <input type="radio"/> Systematically <input type="radio"/> Occasionally <input checked="" type="radio"/> Not at all | <div style="background-color: #0072bc; color: white; padding: 2px;">Social</div> <input type="radio"/> Systematically <input type="radio"/> Occasionally <input checked="" type="radio"/> Not at all | <div style="background-color: #0072bc; color: white; padding: 2px;">Governance</div> <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all |
| Corporate (non-financial) | <div style="background-color: #0072bc; color: white; padding: 2px;">Environmental</div> <input type="radio"/> Systematically <input type="radio"/> Occasionally <input checked="" type="radio"/> Not at all | <div style="background-color: #0072bc; color: white; padding: 2px;">Social</div> <input type="radio"/> Systematically <input type="radio"/> Occasionally <input checked="" type="radio"/> Not at all | <div style="background-color: #0072bc; color: white; padding: 2px;">Governance</div> <input type="radio"/> Systematically <input checked="" type="radio"/> Occasionally <input type="radio"/> Not at all |

Corporate (financial)

We only integrate governance performance, from theCodigo País poll, mandatory for issuers in Colombia.

Corporate (non-financial)

We only integrate governance performance, from theCodigo País poll, mandatory for issuers in Colombia.

Fixed income - Engagement

| | | | | |
|--------------|--|---------------|----------------------|--------------|
| FI 15 | Mandatory to Report Voluntary to Disclose | Public | Core Assessed | PRI 2 |
|--------------|--|---------------|----------------------|--------------|

FI 15.1 Indicate the proportion of your fixed income assets on which you engage. Please exclude any engagements carried out solely in your capacity as a shareholder.

| Category | Proportion of assets |
|------------------------------|---|
| Corporate (financial) | <input type="radio"/> >50% <input type="radio"/> 26-50% <input type="radio"/> 5-25% <input checked="" type="radio"/> More than 0%, less than 5% |
| | <p>FI 15.2 Indicate your motivations for conducting engagement (Corporate, Financial fixed income assets)</p> <input checked="" type="checkbox"/> To gain insights into ESG (i.e. enhance disclosure) <input type="checkbox"/> To effect change (i.e. ask an issuer to manage ESG risk and/or opportunity) <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above |

| | | | | |
|--------------|--|---------------|----------------------------|----------------|
| FI 16 | Mandatory to Report Voluntary to Disclose | Public | Additional Assessed | PRI 1,2 |
|--------------|--|---------------|----------------------------|----------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

FI 16.1 Indicate how you typically engage with issuers as a fixed income investor, or as both a fixed income and listed equity investor. (Please do not include engagements where you are both a bondholder and shareholder but engage as a listed equity investor only.)

Select all that apply

| Type of engagement | Corporate (financial) | | |
|---------------------------------------|-------------------------------------|--|--|
| Individual/Internal staff engagements | <input checked="" type="checkbox"/> | | |
| Collaborative engagements | <input type="checkbox"/> | | |
| Service provider engagements | <input type="checkbox"/> | | |

FI 16.2

Indicate how your organisation prioritises engagements with issuers

Select all that apply

| | Corporate (financial) | | |
|---|-------------------------------------|--|--|
| Based on potential materiality of ESG factors | <input type="checkbox"/> | | |
| Based on systemic risks (e.g. low-carbon transition) to global portfolios | <input type="checkbox"/> | | |
| Based on our exposure (holdings) | <input checked="" type="checkbox"/> | | |
| Other | <input type="checkbox"/> | | |

FI 16.3

Indicate when your organisation conducts engagements with issuers.

Select all that apply

| | Corporate (financial) | | |
|---|-------------------------------------|--|--|
| Engagements are conducted pre-investment | <input checked="" type="checkbox"/> | | |
| Engagements are conducted post-investment | <input checked="" type="checkbox"/> | | |
| Other, describe | <input type="checkbox"/> | | |

FI 16.4

Indicate how your organisation conducts engagements with issuers.

Select all that apply

| | Corporate (financial) | | |
|---|-------------------------------------|--|--|
| We systematically engage prior to ESG-related divestments | <input type="checkbox"/> | | |
| We engage proactively in anticipation of specific ESG risks and/or opportunities | <input type="checkbox"/> | | |
| We engage in reaction to ESG issues which have already affected the issuer | <input checked="" type="checkbox"/> | | |
| Investment and ESG analysts systematically conduct ESG-related engagements together | <input type="checkbox"/> | | |
| Other, describe | <input type="checkbox"/> | | |

FI 16.5

Indicate what your organisation conducts engagements with issuers on.

Select all that apply

| | Corporate (financial) | | |
|---|-------------------------------------|--|--|
| We conduct engagements with individual issuers | <input checked="" type="checkbox"/> | | |
| We conduct engagements within sectors and industries. | <input type="checkbox"/> | | |
| We conduct engagements on specific ESG themes (e.g. human rights) | <input type="checkbox"/> | | |
| Other, describe | <input type="checkbox"/> | | |

FI 16.6

Indicate how your organisation shares the outcomes of the engagements internally.

Select all that apply

| | | | |
|---|-------------------------------------|--|--|
| | Corporate (financial) | | |
| We have a systematic process to ensure the outcomes of engagements are made available | <input type="checkbox"/> | | |
| We occasionally make the outcomes of engagements available | <input checked="" type="checkbox"/> | | |
| Other, describe | <input type="checkbox"/> | | |
| We do not make this information available | <input type="checkbox"/> | | |
| We do not share the outcomes of the engagements internally | <input type="checkbox"/> | | |

| | | | | |
|--------------|--|---------------|----------------------------|----------------|
| FI 17 | Mandatory to Report Voluntary to Disclose | Public | Additional Assessed | PRI 1,2 |
|--------------|--|---------------|----------------------------|----------------|

FI 17.1 Indicate if your publicly available policy documents explicitly refer to fixed income engagement separately from engagements in relation to other asset classes.

- Yes
- No

Outputs and outcomes

| | | | | |
|--------------|--|---------------|----------------------------|----------------|
| FI 18 | Mandatory to Report Voluntary to Disclose | Public | Additional Assessed | General |
|--------------|--|---------------|----------------------------|----------------|

FI 18.1 Indicate whether your organisation measures how your incorporation of ESG analysis in fixed income has affected investment outcomes and/or ESG performance.

Select all that apply

| | Corporate (financial) | Corporate (non-financial) | |
|---|-------------------------------------|-------------------------------------|--|
| We measure whether incorporating ESG impacts funds' reputation | <input type="checkbox"/> | <input type="checkbox"/> | |
| We measure whether incorporating ESG impacts financial returns | <input type="checkbox"/> | <input type="checkbox"/> | |
| We measure whether incorporating ESG impacts risk | <input type="checkbox"/> | <input type="checkbox"/> | |
| We measure whether incorporating ESG impacts funds' ESG performance | <input type="checkbox"/> | <input type="checkbox"/> | |
| None of the above | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |

Bancolombia

Reported Information

Public version

Assurance

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Assurance

| | | | | |
|----------|-----------|--------|---------------|---------|
| CM1 01.1 | Mandatory | Public | Core Assessed | General |
|----------|-----------|--------|---------------|---------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | | | | |
|----------|---|--|--|--|
| CM1 01.1 | Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone: | | | |
|----------|---|--|--|--|

- Third party assurance over selected responses from this year's PRI Transparency Report
- Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year)
- Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data that have been reported to the PRI this year)
- Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
- Other, specify
- None of the above

| | | | | |
|-----------------|-----------|--------|-------------|--|
| CM1 01.2 & 01.8 | Mandatory | Public | Descriptive | |
|-----------------|-----------|--------|-------------|--|

| | | | | |
|----------|--|--|--|--|
| CM1 01.2 | Do you plan to conduct third party assurance of this year's PRI Transparency report? | | | |
|----------|--|--|--|--|

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year's PRI Transparency report

| | | | | |
|-----------------|-----------|--------|-------------|---------|
| CM1 01.3 & 01.9 | Mandatory | Public | Descriptive | General |
|-----------------|-----------|--------|-------------|---------|

| | | | | |
|----------|---|--|--|--|
| CM1 01.3 | We undertook third party assurance on last year's PRI Transparency Report | | | |
|----------|---|--|--|--|

- Whole PRI Transparency Report was assured last year
- Selected data was assured in last year's PRI Transparency Report
- We did not assure last year's PRI Transparency report, or we did not have such a report last year.

| | | | | |
|-----------------|-----------|--------|-------------|---------|
| CM1 01.4, 10-12 | Mandatory | Public | Descriptive | General |
|-----------------|-----------|--------|-------------|---------|

CM1 01.4

We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- We adhere to an RI certification or labelling scheme
- We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report
- ESG audit of holdings
- Other, specify
- None of the above