

INDEPENDENCE CRITERIA

BOARD OF DIRECTORS

Independence Criteria		Alejandro Piedrahíta Borrero	Guillermo Villegas Ortega	Jaime Arrubla Paucar	Jaime Velásquez Botero	Jorge Mario Velásquez Jaramillo	Luis Javier Zuluaga Palacio	Pedro Mejía Villa
1.	The director must not have been employed by the company in an executive capacity within the last year.	X	X	X	X	X	X	X
2.	The director must not accept or have a “Family Member who accepts any payments from the company or any parent or subsidiary of the company in excess of \$60,000 during the current fiscal year,” other than those permitted by SEC Rule 4200 Definitions.	X	X	X	X	X	X	X
3.	The director must not be a “Family Member of an individual who is employed by the company or by any parent or subsidiary of the company as an executive officer.”	X	X	X	X	X	X	X
4.	The director must not be (and must not be affiliated with a company that is) an adviser or consultant to the company or a member of the company’s senior management.	X	X	X	X	X	X	X
5.	The director must not be affiliated with a significant customer or supplier of the company.	X	X	X	X	X	X	X
6.	The director must have no personal services contract(s) with the company and cannot be a member of the company’s senior management.	X	X	X	X	X	X	X
7.	The director must not be affiliated with a notfor-profit entity that receives significant contributions from the company.	X	X	X	X	X	X	X
8.	The director must not have been a partner or employee of the company’s outside auditor during the past year.	X	X	X	X	X	X	X
9.	The director must not have any other conflict of interest that the board itself determines to mean they cannot be considered independent.	X	X	X	X	X	X	X

Spaces marked with an “X” confirm compliance with the different criteria by the Directors.