

QUESTIONNAIRE ON ANTI MONEY LAUNDERING AND TERRORISM FINANCING

I. GENERAL INFORMATION

1. Organization's full name: " Banco Davivienda S.A. Colombia "
2. Web page: www.davivienda.com
3. Full address of main office (including city and country): "Avenida El Dorado # 68 C - 61 piso 10 - Bogotá D.C., Colombia"
4. Number of offices in the country: 597 (Colombia)
5. Affiliates Abroad: Panamá, Costa Rica, El Salvador, Honduras and Miami (Branch)
6. Name of control and surveillance authority that monitors your Organization: Financial Superintendence of Colombia

II. POLICIES AND PROCEDURES

	YES	NO
1. Does your organization have a system in place for prevention and control of the Money Laundering and Terrorism Financing Risk, which takes into account the guidelines that regulate the subject nationally and internationally?	✓ ✓	
2. Is your System or Policy Manual for prevention and control of the Money Laundering and Terrorism Financing risk approved by the Board of Directors?		
3. Does your System or Manual describe the duties and responsibilities of the Board of Directors, the Legal Representative and the Compliance Officer, in respect to the Prevention of Money Laundering and Terrorism Financing?	✓	
4. Has your System or Policy Manual for prevention and control of the Money Laundering and Terrorism Financing risk been reviewed by any competent authority?	✓	
<i>If yes, indicate the name of the authority:</i> <i>Financial Superintendence of Colombia</i>		
5. Do the policies and procedures of your Organization take into account the recommendations given by international organizations such as FATF (Financial Action Task Force on Money Laundering) or GAFI (For its initials in Spanish), el GAFISUD (Financial Action Task Force in South America) or by the USA Patriot Act?	✓	
6. Do your AML/ATF policies and procedures require greater due diligence in the knowledge of the customers, for those who represent a higher level of risk in Money Laundering or Terrorism Financing?	✓	
7. Are the policies for prevention and control of Money Laundering and Terrorism Financing applicable also to your offices abroad?	✓	
8. Does your organization have an internal and/or external audit program that monitors and/or audits the Anti Money Laundering and Terrorism Financing System?	✓	
<i>If yes, indicate the name of the entity of said audit and the frequency of the review:</i> <i>"KPMG Colombia Ltda", external audit firm issues the report on the evaluation of the Money Laundering and Terrorism Financing Risk Administration System (SARLAFT, for its initials in Spanish) quarterly. Additionally, the Internal Audit Vice Presidency of the Bank carries out periodical reviews to the compliance program.</i>		
9. Does your organization have designated a Compliance Officer for the definition and follow up of the policies and procedures for Money Laundering and Terrorism Financial prevention and control?	✓	
<i>If yes, provide the following information:</i>		
Name: <i>Liliana Alvis Cruz</i>		
E-mail: lalvis@davivienda.com		
Telephone and Fax: <i>(57)(1) 330 00 00 Ext. 90101</i>		
Full address (with city and country): <i>"Avenida El Dorado # 68 B - 85 piso 3 - Bogotá D.C., Colombia"</i>		

10. Was the Compliance Officer appointed by the Board of Directors in your organization?	✓	
11. Does your Organization have physical presence in the country where it operates?	✓	
12. Does your Organization open accounts to foreign banks that do not have physical presence in any country of the so-called "Shell Banks"?		✓
<i>If yes, does it have controls implemented that help it mitigate the risks of those operations? Which?</i>		
13. Does your organization offer the so-called "Payable Through Accounts" ¹ ?		✓
If yes, Does your Organization validate that the entities that use this type of service, are monitored by any regulatory authority and fully comply with know-your-customer policies and Anti Money Laundering and Terrorism Financing regulations, established by the FATF, GAFISU or UN?	N/A	N/A
14. Has your organization been penalized or has it received any legal requirement from the regulatory entity in the past five (5) years, because of the nonfulfillment of the Anti-Money Laundering and Terrorism Financing legislation?		✓
<i>If yes, enclosed details of said penalization.</i>		
15. Please attach the list of products and services offered by your Organization with the description of each one. The description is found in the web page www.davivienda.com option "Aquí puedo"		
16. Please attach the capital stock composition of your Organization, for those who own a 5% or more interest of the total shares. The description is in the web page www.davivienda.com option "Información para Inversionistas (in the top of right)/English/Corporate Governance/Majority Stockholders"		

III. KNOWLEDGE OF CUSTOMER

	YES	NO
17. Does your System or Compliance Manual include policies for identification and knowledge of customers?	✓	
18. Does your organization have procedures to create a record for each customer where the identification information and KYC (Know your Customer) data is entered?	✓	
19. Does your organization have procedures for recording and conservation of information on transactions with its relevant information, for the minimum legal time required?	✓	
20. Does your organization have procedures to update information of customers or title holders of operations? If your answer is yes, What is the frequency of said updating procedure? <i>Once a year</i>	✓	

IV. MONITORING OF OPERATIONS AND REPORT OF SUSPICIOUS OPERATIONS

	SI	NO
21. Does your organization have procedures for the electronic consolidation of all your customers' operations?	✓	
22. Does your organization have procedures for the determination of alert signs based on risk profiles?	✓	

¹ "Payable Through Accounts": Are sight deposit accounts, open by a bank with a correspondent bank in the United States, that permits payment transfers in other places and allows its customers "sub-accounts" with bank services that only a commercial bank could provide.

23. Does your organization have a procedure for the identification and reporting of suspicious activities or transactions to the respective authorities? <i>If your answer is yes, Which authority should this be reported to? Financial Information and Analysis Unit of Colombia (UIAF for its initials in Spanish)</i>	✓	
24. Does your organization have established a monitoring system that permits to detect accounts and transactions whose initiators/beneficiaries are in the OFAC (Office of Foreign Assets Control) and the UN (United Nations) and other official control lists?	✓	

V. TRAINING

	SI	NO
25. Does your organization have a training program to the employees on the knowledge of the customers and the prevention and control of Money Laundering and Terrorism Financing prevention and control?	✓	
26. Does your Organization keep records of your training sessions, including records of assistance and the relevant materials used?	✓	
27. Does your organization have policies to train employees on the subject of Anti Money Laundering and Terrorism Financing?	✓	
I hereby certify that I have read and understood the questionnaire, that the information contained herein is complete and accurate and that I am authorized to complete it and execute it on behalf of this Organization.		
Name	Liliana Alvis Cruz	
Title	Compliance VP	
Date (dd/mm/yyyy)	February 14, 2017	