

**CERTIFICATION ON THE ADMINISTRATION RISK SYSTEM TO MONEY LAUNDRY,
TERRORISM FINANCING AND PROLIFERATION OF WEAPONS OF MASS
DESTRUCTION FINANCING (SARLAFT)¹**

Banco Davivienda S.A. is a Financial Entity incorporated in accordance with Colombian regulation and supervised by the Financial Superintendency of Colombia.

The Bank has implemented a Compliance Program, as part of its organizational culture. This system is structured through tools and instruments disseminated through policies and procedures aimed at the prevention, control, detection and reporting of operations related to Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction, and is subject to continuous evaluation, thus complying with the regulatory framework set forth in Colombian legislation, which includes the provisions of Decree 663 of 1993 (Colombian Financial System Statute), the Basic Legal Bulletin (External Bulletin 007 of 1996) and other regulations issued by the Financial Superintendency of Colombia; as well as the recommendations and best international practices in this area, especially those issued by the FATF.

The operations carried out by the Bank are framed within the ethical and internal control standards, which have as their axis the sound financial practices and the practices of prevention of moneylaundering and financing of terrorism, in the fulfillment of the commercial objectives. The work guidelines and instructions for the application of the Compliance Program are set forth in the Compliance Manual and in the Code of Conduct and Ethics approved by the Bank's Board of Directors, which are of mandatory compliance for all the Entity's employees.

Knowledge of the customer:

The Compliance Manual contemplates policies for the linking, updating, monitoring and cancellation of products when the objective and reasonable grounds established by the Entity, related to violations of the compliance program, are configured. Likewise, due diligence mechanisms have been structured for the knowledge of customers, allies and counterparties during the processes of linking, updating, validation of information and monitoring, among others. The due diligence establishes reinforced measures of knowledge and approval by officials of a higher rank, for those clients that, due to their profile or the functions they perform, may expose the entity to a greater degree to the AL/FT risk, such as High-Risk Activities and Publicly or Politically Exposed Persons, High-Risk Jurisdictions, among others.

¹ Spanish acronym for Risk Management System for Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction].

Monitoring Function:

Banco Davivienda S.A. monitors the transactional behaviors of its customers, products, channels and jurisdictions, in order to identify and analyze unusual transactions. Likewise, it has objective criteria for the determination of suspicious transactions, which are reported to the Financial Information and Analysis Unit (UIAF [for its Spanish acronym]). For customers whose risk profile is higher, a reinforced monitoring scheme has been established. In order to meet this objective, the bank has set up automated systems and manual analyses for the detection and alerting of these activities.

Training:

The Management of Banco Davivienda S.A. recognizes the importance of SARLAFT training for all its employees, given their active role in the fight against Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction.

In accordance with the above, all employees of Banco Davivienda S.A. are trained in the prevention of crimes related to AL/FT, training which is disseminated to the areas in charge of implementing the Compliance Program, to the different commercial areas and forces, as well as to the new employees in the induction process.

Organizational Structure:

The Senior Management, the Board of Directors, the Legal Representatives, the Compliance Officer and each one of the Entity's employees have specific roles and responsibilities that allow the effective and efficient operation of the Entity's compliance program. In order to carry out the functions established by the legal regulations in relation to the SARLAFT and aware of its commitment with the Compliance Program, the Board of Directors of Banco Davivienda S.A. has appointed a Compliance Officer and his alternate, who have duly taken office before the Financial Superintendency of Colombia.

Audit and control:

The Bank is subject to surveillance and inspection by the Financial Superintendency of Colombia, which conducts visits to the Bank in order to validate the compliance with the Compliance Program and its correct implementation.

The control entities, such as the Internal Audit and the External Audit, have included in their permanent planning the review of the execution of the Entity's Compliance Program, generating periodic reports directly to the Board of Directors and the Bank's management, which are used to continuously improve the controls and procedures defined by the Entity.

Record keeping:

The Entity has provided tools and mechanisms for the documentary conservation of the stages and constitutive elements of the compliance program, which have information security measures that ensure the integrity, timeliness, reliability and controlled availability of the information. Likewise, the information of customers and their transactions is kept in accordance with the parameters provided by law.

Anti-corruption and anti-bribery policy:

As a fundamental pillar of the Anti-Corruption Program, Banco Davivienda S.A. has adopted a commitment to zero tolerance with respect to any event of corruption, through the generation of policies that forbid bribery in any of its forms, either direct or indirect, through its employees, collaborators, customers, suppliers and other stakeholders. Likewise, it has policies that regulate the events of conflicts of interest that may arise in relation to a public official or persons of the private sector; for this, the program includes procedures, controls and employee training programs to ensure compliance with these policies.

Sincerely,



Liliana Alvis Cruz
Compliance Officer
29/11/2024