

## **Money-laundering, financing of terrorism and proliferation of weapons of mass destruction risk management and Anti-Corruption policy certificate**

BBVA Colombia (hereinafter the **Entity**), credit establishment, properly constituted in Colombia, having its domicile in Bogotá D. C., Carrera 9° No. 72-21, Telephone 57 6011 3471600.

### **1.- Shares Participation (Stock ownership over 5% of the capital):**

<https://www.bbva.com.co/content/dam/public-web/colombia/documents/home/prefooter/gobierno-corporativo/DO-01-principales-accionistas.pdf>

### **2.- Composition of the Board of Directors:**

<https://www.bbva.com.co/personas/atencion-al-inversionista/gobierno-corporativo/junta-directiva.html>

### **3.- Legal Representatives of the Entity:**

<https://www.bbva.com.co/personas/atencion-al-inversionista/gobierno-corporativo/administradores.html>

### **4.- Supervision:**

The Entity is supervised by the Superintendencia Financiera de Colombia.

### **5.- Money Laundering and Terrorism Finance Risk Management**

The Entity has implemented an Anti-Money Laundering and Counter Terrorist Financing risk system (hereinafter the System). Complying the rules of the Organic Statute of the Colombian Financial System (Decree 663 of 1993), and the instructions issued by the Superintendencia Financiera de Colombia, as well as international recommendations and best practices in this area, principally Financial Action Task Force (FATF) rules.

The policies, controls and procedures implemented, seek to prevent that the Entity is used to give the appearance of legality to assets derived from criminal activities or for channeling resources used to the realization of terrorist activities.

The risk System consists of two key phases: (a) Risk prevention aimed to prevent the introduction of resources from activities related to money-laundering and the financing of terrorism of the Entity (hereinafter AML/CTF), and (b) The control to detect and report operations that are intended to be carried out or have been carried out, in order to give the appearance of legality to operations linked to AML/CTF. The System includes all the operations that the Bank develops within its principal business project, and has been implemented through the identification of risk factors, stages and elements.

The procedures and rules of conduct on the implementation of the System are stipulated in the Code of Conduct on the AML/CTF risk administration. The System policy and its corresponding instructions have been approved by the Entity's Board of Directors and are binding and obligatory for all the employees of the Bank.

- Know your Customer Policy

Our Know your Customer Policy seeks to obtain effective, efficient and appropriate knowledge of all current and potential customers, including, non-face-to-face customers, as well as verification of their information, documentation, identification of the ultimate beneficial owner,

The Entity has established policies, procedures and periodical monitoring processes of operations of domestic or foreign people or legal entities that because of their profile, business activity or active professional role may expose the Entity to a higher **AML/CTF** risk. This includes a senior management to sign customers from countries, businesses, and products with a greater risk of money-laundering/terrorism financing.

In order to initiate international correspondent relationships, BBVA Colombia has a policy that defines the due diligence process in order to establish the level of risk attributable to the Entity which it is intended to establish the relationship and contains the prohibition to establishing or maintaining any relationship of a financial or transactional nature with "Shell Banks".

The Entity has methodologies to collect information with the purpose of comparing the characteristics of clients' transactions with their economic activity, permanently monitoring their operations, analyze their unusual transactions and determine the existence of suspicious transactions to report to the Financial Intelligence and Analysis Unit. In fact, BBVA Colombia has a ten year record keeping of all AML/CTF related documents.

- AML/CTF stages

The Entity's AML/CTF System contemplates the stages of identification, measurement, control and monitoring of the risks inherent in the development of its business object of the risk factors established in internal policies. Furthermore, procedures against terrorist financing include formal searches against lists of known or suspected terrorists issued by competent authorities having jurisdiction over the Entity.

- Audit and Control

The Entity has bodies and instances responsible for conducting the evaluation of AML/CTF, so its shortcomings or weaknesses can be identified and reported in their annual independent assessment to the corresponding levels in the organization. The established control bodies are External and Internal Audit.

## 6.- Anti-corruption Policy and Code of Conduct

The Entity has a firm commitment to legality and its ethical principles require acting with the

utmost honesty, integrity and transparency, both within the Entity and with its clients, agents, intermediaries, business partners, public or private institutions and other third parties to which it relates.

The organization has a Code of Conduct and an Anti-corruption Policy aimed to prevent, detect and promote the communication of corrupt practices or risk situations, as well as to determine specific behavior patterns in sensitive activities or areas, facilitating the recognition of cases requiring particular caution and, in case of doubt, providing appropriate advice.

The Code of Conduct and the Anti-corruption Policy are mandatory for all its administrators, managers and employees in all activities arising from their position in BBVA and may be extended to third parties or entities, provided that they have a business or professional relationship with the Entity and their performance represents a risk or responsibility for the Entity or may directly or indirectly affect its good name.

The Entity only establishes relationships with third parties aligned with its principles and values of zero tolerance to corruption. This position is transferred to these third parties through the inclusion of specific clauses on anti-corruption in contracts, engagement letters and other documents with a similar purpose.

Within the general patterns of behavior established to prevent corruption are, among others, the following:

- (a) Personal gifts or benefits may not be given, promised, offered or accepted, directly or indirectly, which may have as their object:
  - i. Facilitating or favoring the acquisition or improper retention of a business, contract, interest or advantage in favor of the Entity or by the Entity; or
  - ii. Influencing, for that purpose, those with decision-making power.
- (b) No payment can be accepted or requested, on any portion of a contractual relationship with third parties, that are unjustified or that involve the payment of commissions or compensations other than those resulting from the provision of products and services specific to the ordinary activity or the Entity.
- (c) Disclosures and procedures in order to regulate charitable contributions and sponsorships are instituted.
- (d) Political contributions (direct or indirect) are prohibited, whereas we have a compromise with political neutrality, the Entity does not encourage nor allow contributions made by their employees under BBVA's name.
- (e) It is not permissible to provide illegitimate favors or advantages to entities or people with whom BBVA maintains or is able to maintain contractual or business relations.

The entity expressly prohibits the offering, promise, delivery and acceptance of a request for direct or indirect facilitation payments to public employees, regardless of the amount and territory.

## **7.- Staff training**

BBVA Colombia has a training and communications program, which is one of the main elements of the Compliance Risk Management Model. In furtherance of the above, the Entity facilitates and provides its employees and managers with training programs aimed at promoting the values of BBVA, its culture of ethics, anti-corruption and AML/CTF risk management.

### **8.- Chief Compliance Officer**

For the performance of the functions established by legal and corporate regulations, the Board of Directors of the Entity has appointed a Chief Compliance Officer and a Deputy Compliance Office, who are duly submitted to the Superintendencia Financiera de Colombia. The Chief Compliance Officer is a person of high hierarchical level in the Entity, with decision-making capacity, which is supported by a work team that allows to cover the different areas of management and has the effective support of the Entity's directors to adequately manage the risks of Compliance function.



**SANDRA MILENA MEZA CUERVO**  
Executive Vice President of Internal Control & Compliance  
Compliance Officer  
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