

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

BBVA Valores Colombia (hereinafter the **Entity**), is a stockbroker company, properly incorporated in Colombia, having its domicile in Bogotá D. C., Carrera 9ª No. 72-21, Telephone 57 601 3077018.

1.- Supervision

The Entity is supervised by the Superintendencia Financiera de Colombia.

2.- 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 entry of resources from activities related to money-laundering and the financing of terrorism to 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/CFT. The System includes all the operations that the Entity develops within its main corporate purpose, 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 contemplated in the Code of Conduct, the System policy and its corresponding regulations, that have been approved by the Entity's Board of Directors and are binding and obligatory for all employees.

- Know your Customer Policy

Our Know your Customer policy seeks to obtain effective, efficient and appropriate knowledge of all current and potential customers as well as verification of their information and documentation.

The Entity has established enhanced due diligence procedures and monitoring process of operations of domestic or foreign people who, due to their profile, business activity or active professional role may expose the Entity to a higher **AML/CTF** risk.

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, to analyze their unusual transactions and to determine the existence of suspicious transactions to be reported to the Financial Intelligence and Analysis Unit.

- AML/CTF stages

The Entity AML/CTF System contemplates the stages of identification, measurement, control and monitoring of the risks inherent in the development of its corporate purpose of the risk factors established in internal policies.

- 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 to the corresponding levels in the organization. The established control bodies are: External and Internal Audit.

3.- 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 Anticorruption 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 Anticorruption 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 anticorruption clauses 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 from third parties that is unjustified or that involves the payment of commissions or compensations other than those resulting from the provision of products and services specific to the ordinary activity of the Entity.
- c) 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.

4.- Staff training

BBVA Colombia has a training and communication 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, integrity, anticorruption, promotion of free competition and sustainability, personal data protection and AML/CTF risk management.

5.- 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 Officer, 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 the Compliance function.



MARLO ROSJEANNE MEDINA VARGAS
Compliance Officer 2024