ANNEX III OF CORPORATE GOVERNANCE CODE

INTERNAL REGULATION OF THE AUDIT AND COMPLIANCE COMMITTEE BBVA COLOMBIA

1. NATURE

The Audit and Compliance Committee, hereinafter The Committee, is a study and support body dependent on the Board of Directors of BANCO BILBAO VIZCAYA ARGENTARIA COLOMBIA S.A. – BBVA Colombia, (hereinafter the “Bank” or the “Entity”) in its role of supervising the Entity’s Control Architecture, a comprehensive concept that addresses everything related to the control environment, risk management, internal control systems, information and communication, and monitoring.

2. OBJECT

The Audit and Compliance Committee is responsible for providing support in the oversight of the financial statements and in the management of the Bank's Board of Directors regarding the implementation and oversight of the Bank's Control Architecture.

Additionally, the Committee is responsible for ensuring that the Bank complies with relevant laws and regulations and that effective controls are maintained in its business operations against employee conflicts of interest and fraud. This does not replace the responsibilities of the Board of Directors and Management regarding the implementation, oversight, evaluation, and adjustment of the Bank's internal control system.

3. COMPOSITION

The Committee shall be composed of three members of the Board of Directors, who must have knowledge and experience in matters related to the functions assigned. The Committee must be comprised mostly of independent members, understood as those who, under no circumstances, are employees or executives of the Entity or any of its affiliates, subsidiaries, or parent companies, nor who have held such positions during the year immediately prior to their appointment, except in the case of the re-election of the independent person. Likewise, for these purposes, individuals who meet the criteria for independence in accordance with current legal and statutory provisions shall qualify as independent members.

The members of the Committee shall serve a two-year term and may be re-elected indefinitely. Furthermore, the members of the Committees shall be evaluated according to the methodology and frequency established in the Board of Directors' Rules of Procedure. The Committee shall have a Chairperson, who will be appointed for the corresponding term by the Board of Directors from among the two independent members. The General Secretary of the Entity shall act as Secretary of the Committee, or, in their absence, the person designated by the Committee itself.

Different Bank officers may be summoned to Committee meetings if deemed appropriate, in order to provide necessary and relevant information on matters within their area of responsibility and to allow the Committee to offer proper support to the Board of Directors.

Additionally, the Committee may exceptionally hold sessions with the participation of all members of the Board of Directors of the Entity, depending on the importance or relevance of the topics to be addressed.

4. FUNCTIONS

Within the objective scope established in the previous section, the Audit and Compliance Committee will exercise the following functions:

i. Approve the structure, procedures, and methodologies necessary for the functioning of the Control Architecture.
ii. Define the responsibilities, powers, and limits assigned to the various positions and areas regarding the administration of the Internal Control System (ICS), including risk management.
iii. Evaluate the internal control structure of the Entity to determine whether the designed procedures reasonably protect its assets, as well as those of third parties it manages or safeguards; whether controls exist to ensure that transactions are properly authorized and recorded; and whether such controls and procedures align with the Entity's needs, objectives, goals, and strategies, while falling within the scope of internal control objectives such as operational efficiency and effectiveness, and the sufficiency and reliability of financial information.
iv. Ensure that management provides the information required by oversight bodies for the performance of their duties.
v. Ensure that the preparation, presentation, and disclosure of financial information comply with applicable regulations, verifying the existence of necessary controls.
vi. Review the financial statements and prepare the corresponding report to be submitted to the Board of Directors, based on an evaluation not only of the respective drafts and their notes but also of the opinions and observations from regulatory bodies, the results of evaluations conducted by relevant committees, and other related documents.
vii. Design, implement, and evaluate programs and controls to prevent, detect, and respond appropriately to the risks of fraud and misconduct—understanding fraud as an intentional act committed to obtain an illicit gain, and misconduct as the violation of laws, regulations, or internal policies.
viii. Oversee the functions and activities of Internal Audit to determine its independence and objectivity in relation to the activities it audits, assess any limitations affecting its proper performance, and verify whether the scope of its work meets the Entity’s control needs.
ix. Monitor risk exposure levels, their implications for the Entity, and the measures adopted for their control or mitigation at least every three months, or more frequently if necessary, and present a report to the Board of Directors on the most important aspects of the risk management activities.
x. Evaluate the internal control reports conducted by internal auditors, regulatory compliance officers, or other bodies, verifying that management has addressed their suggestions and recommendations.Hacer seguimiento al cumplimiento de las instrucciones dadas por la Junta Directiva en relación con el SCI.
xi. Request any reports it deems appropriate for the proper performance of its functions.
xii. Analyze the functioning of the information systems, their reliability, and integrity for decision-making purposes.

xiii. Present to the highest corporate body, through the Board of Directors, the candidates to hold the position of Statutory Auditor, without prejudice to the shareholders' right to present other candidates during the respective meeting. In this regard, the role of the Committee will be to gather and analyze the information provided by each candidate and submit the results of the evaluation to the highest corporate body for consideration.

xiv. Propose to the Board of Directors, for submission to the General Shareholders' Meeting, the removal or non-renewal of the Statutory Auditor, using the results of the evaluation referred to in the following item.

xv. Supervise the services of the Statutory Auditor, which includes evaluating their quality, independence, and effectiveness. The Statutory Auditor must report any issues that may compromise their independence, for review by the Audit Committee, as well as any additional services of any kind provided and the corresponding fees received by the external auditor or by individuals or entities related to them.

xvi. Interact and maintain regular relations with the Statutory Auditor, and in particular, evaluate and report to the Board of Directors on any situations that may limit their access to information or compromise their independence, as well as any issues related to the annual audit plan and the development of the financial audit, and any other communications required under financial audit legislation and technical auditing standards.

xvii. Understand and evaluate the process of preparing, presenting, and disclosing financial information.

xviii. Verify that the periodic information disclosed to the market is prepared in accordance with the same principles and professional practices as the annual accounts, overseeing this information prior to its release.

xix. Propose to the Board of Directors the selection, appointment, compensation, reappointment, and dismissal of the head of the internal audit service. **xx.** Evaluate and report to the Board of Directors on conflict of interest situations, whether temporary or permanent, in which a significant shareholder, members of the Board of Directors, Senior Management, or their affiliates may be involved—either directly, indirectly, or through related parties—and make the necessary proposals to manage the situation. Prepare the report that the Board of Directors must present to the highest corporate body regarding the operation of the Internal Control System (ICS), which must include, among other aspects:

- The general policies established for the implementation of the Entity's ICS.
- The process used to review the effectiveness of the ICS, with specific mention of aspects related to risk management.
- The most relevant activities carried out by the Audit Committee.
- The material deficiencies detected, the recommendations made, and the measures adopted, including, among other matters, those that could affect the financial statements and the management report.
- Observations made by supervisory bodies and any penalties imposed, when applicable.

- Present the evaluation of the work carried out by Internal Audit, including, among other aspects, the scope of the work performed, the independence of the function, and the resources allocated to it.

xx. Define the mechanisms for consolidating information from the Bank's oversight bodies for submission to the Board of Directors.

xxi. Analyze and approve the Internal Audit Charter and the Annual Internal Audit Plan, as well as any additional occasional or specific plans that must be implemented due to regulatory changes or organizational needs of the Entity's business. Likewise, the Committee will monitor these plans as circumstances may require.

xxii. Monitor the degree of compliance by audited units with corrective measures recommended by Internal Audit in previous actions, and report to the Board of Directors any cases that may pose a significant risk to the Bank or its Group companies.

xxiii. Ensure that Internal Audit has the appropriate training and resources to carry out its functions within the Entity, including personnel, equipment, systems, procedures, and operating manuals. The Committee will also be informed of any obstacles that may have arisen in the performance of its duties.

xxiv. Ensure the transparency of the financial and non-financial information prepared by the Entity and its proper disclosure. To this end, the Committee shall establish the policies, criteria, and practices to be used by the Bank in the preparation, disclosure, and communication of its financial and non-financial information, and shall oversee that necessary controls and appropriate tools are in place to verify that the financial statements reflect the company's actual situation and the value of its assets.

xxv. Confirm or reject the opinion of the Statutory Auditor regarding the adequacy and sufficiency of the Entity's internal control measures, which must be presented to the General Shareholders' Meeting.

xxvi. Oversee compliance with applicable regulations related to money laundering and ensure that the necessary controls exist to prevent the Entity from being used as a tool for criminal activities, especially money laundering and terrorist financing (ML/TF), by reviewing reports that the Compliance Officer must submit to the Board of Directors.

xxvii. Oversee compliance with applicable regulations regarding securities markets, data protection, and the scope of the Entity's actions in consumer protection matters, as well as ensure that information or action requests made by competent official bodies on these matters are met.

xxviii. Comply with the provisions contained in the Board of Directors' Rules and Regulations and those applicable to conduct in the securities market.

xxix. Review reports from external supervisory bodies, particularly those from the Financial Superintendency of Colombia and other oversight entities. For this purpose, the administrative and oversight bodies of the Entity shall ensure that such reports are duly communicated to the Committee, in a timely manner according to the relevance of the matter, through its Chair.

xxx. Review the draft codes of conduct and their amendments, prepared by the corresponding area of the Entity.

xxxi. Analyze and approve the Annual Action Plan of the Compliance Area, including any modifications, and monitor its execution as frequently as deemed necessary.

xxxii. Be informed of actions affecting the conduct of the members of the Entity's Board of Directors relating to the Board’s Rules and Regulations and their actions in the securities market, which shall be reported to the Board of Directors when the Committee deems it necessary.

xxxiii. Issue a report regarding potential transactions planned with related parties, verifying that such transactions are conducted under market conditions and do not violate equal treatment among shareholders.

xxxiv. Periodically monitor compliance with the Code of Ethics and the effectiveness of the anonymous reporting or “whistleblower” system, evaluating unethical behaviors and the content of reported complaints, and making appropriate recommendations to the Board of Directors.

xxxv. Carry out any other duties assigned by the Board of Directors.

5. EXTERNAL AND INTERNAL COLLABORATION

The Committee may contract external advisory services on relevant matters when it considers that, for reasons of specialization or independence, these cannot be provided by Group experts or technicians. All services provided by independent auditors other than the Statutory Auditor's Office must be approved in advance by the Audit and Compliance Committee. The Committee may also request personal contributions and reports from any member of the management team when it considers these necessary for the performance of its duties on relevant matters.

6. MEETINGS – QUORUM

The Audit and Compliance Committee shall meet at least four times a year, upon prior notice from its Chair, which may be convened through the Committee Secretary, or when necessary due to special circumstances requiring urgent evaluation or corrective action. The Committee shall deliberate and make valid decisions with the presence and votes of a majority of its members.

7. MINUTES AND INFORMS

The Committee's decisions and actions shall be recorded in minutes signed by the Committee Chair and the Secretary and kept by the Bank's General Secretariat.
The Committee shall submit the following reports:

a) Tot he Board of Directors and Management

- When Situations of significant importance are identified, a special report shall be submitted to the Board of Directors and the Chief Executive Officer of the Bank.
- Annual management report that the Board of Directors must present to the Shareholders’ Meeting regarding the significant activities carried out during the

respective fiscal year. The management report shall be presented directly to the shareholders by the Chair of the Committee when so requested by the Chair of the Meeting.

b) To the Shareholders' Meeting:

In the event that the Statutory Auditor's report contains exceptions, these must be presented to the General Shareholders' Meeting, along with the corresponding action plans to be implemented.

8. DOCUMENTATION

To properly fulfill its functions, the Committee must review and/or evaluate at least the following documentation:

a) The financial statements of the Entity.
b) The opinion on the financial statements issued by the Statutory Auditor.
c) The internal control reports issued by the Statutory Auditor and/or any recommendation or observation letters submitted by the same.
d) The Internal Audit plan, the Regulatory Compliance Area plan, and the Statutory Auditor's plan.
e) The observation letters sent by the Financial Superintendence of Colombia to the Entity as a result of deficiencies detected in the Internal Control System.
f) The periodic evaluation of the Entity's loan portfolio.
g) The Compliance Officer's report to the Board of Directors on the effectiveness of the mechanisms adopted to prevent criminal activities, especially money laundering, and the evaluation of the observation letters from the Financial Superintendence of Colombia regarding deficiencies detected in the internal control system for the prevention of money laundering.

In the performance of their duties, Committee members must maintain confidentiality regarding matters brought before the Committee, as well as any information they may have access to.

9. INTERPRETATION Y MODIFICATION

The Board of Directors is responsible for interpreting and resolving any questions arising from the application of these Regulations, in accordance with the general criteria for interpreting legal norms.

These Regulations will be reviewed and updated by the Board of Directors, in accordance with the dynamics and evolution of the regulations on the subject and in accordance with the results achieved during their development, as well as with any recommendations made regarding best Corporate Governance practices adapted to their social reality.