

ANTI-MONEY LAUNDERING AND COUNTER TERRORISM FINANCING RISK MANAGEMENT CERTIFICATE

BBVA Colombia (hereinafter as to the "Entity"), credit establishment, properly constituted in Colombia, having its domicile at Carrera 9 # 72-21, Bogota, telephone 57 1 3471600.

1. Shares Participation (Stock ownership over 5% of the capital)

<https://www.bbva.com.co/content/dam/public-web/colombia/documents/home/prefooter/investor-relations/corporate-governance/DO-02-Major-Shareholders.pdf>

2. Composition of the Board of Directors

<https://www.bbva.com.co/personas/investor-relations/corporate-governance/board-of-directors.html>

3. Legal Representatives of the Entity

<https://www.bbva.com.co/personas/investor-relations/corporate-governance/legal-representatives.html>

4. State Supervision

The Bank 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-Terrorism Financing (hereinafter as to "AML/CTF") risk management, complying the rules stated by the Organic Statute of the Finance System (Decree 664 of 1993) and the instructions of the *Superintendencia Financiera de Colombia*, and the recommendations and best international practices in this matters, principally FATF¹ rules.

The implemented controls, politics and procedures, avoid that the Entity is used as a mechanism to give legal appearance to assets that belong to illegal activities or for the channeling of resources used to the realization of terrorist activities.

The Risk system has two main phases: a) The prevention of the risk which objective is to prevent that the Bank receives resources of activities related to Asset Laundering and Terrorism Finance (hereinafter as to AL/TF), and b) The Control to detect and report operations that tend to give legal appearance to operations related to AML/CTF. AML/CTF system includes all the operations that the Bank develops within its principal business object and has been set by the identification of risk factors, elements and stages..

All the procedures and rules of conduct that regulate the mechanisms and instruments of AML/CTF System, are stipulated in the Conduct Code of the Asset Laundering and Terrorism Finance Risk Administration, AML/CTF policy and its corresponding instructives, that have been approved by the Bank's Board of Directors; documents that are binding and of obligatory compliance by the Employees of the Bank.


1 Financial Action Task Force

DISCLAIMER: The English version is only a translation from the original in Spanish and should be used for information purposes. In case of discrepancies, the Spanish version shall prevail.

- **Know your Customer Policy**

Our Know your Customer Policy seeks to obtain effective, efficient and appropriate knowledge about all the actual or potential clients, as to the verification of its information and documentation.

The Entity has in placed enhance due diligence procedures and monitoring process for national or foreign persons that because of their profile, their business activity or their active professional role can expose the Entity to a higher AML/CTF risk.

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

The Entity has methodologies to collect information with the purpose of comparing the characteristics of client's transactions with their economic activity, permanently monitor their operations, analyze their unusual transactions and determine the existence of suspicious transactions to be reported to the Unit of Information and Financial Analysis.

- **AML/CTF stages**

The Entity's AML/CTF system contemplates the stages of identification, assessment, control and monitoring the risks inherent to the development of its corporate purpose of the risk factors established in internal policies.

- **Staff training**

The Entity facilitates and provides for its employees and managers training programs in the field of AML/CTF so that they have the elements, guides, knowledge and skills that allow them to detect, prevent and report, with full understanding and awareness, unusual or suspicious operations presented.

- **Compliance Officer**

For the development of the functions established by the legal regulations, the Board of Directors of the Entity has appointed a Chief Compliance Officer and a Deputy Compliance Officer, who are duly registered at the *Superintendencia Financiera de Colombia*. The 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 him to cover the different management areas and has the effective support of the Entity director's.

- **Audit and Control**

The Entity has bodies and instances responsible for carrying out the assessment of the AML/CTF, so its failures or weaknesses can be determined and reported to the corresponding levels in the organization. The established control bodies are: External Auditors and Internal Audit.


SANDRA MILENA MEZA CUERVO
Chief Compliance Officer
March, 2018