

Compliance policy certificate

BBVA Colombia (hereinafter the **Entity**), credit establishment, properly constituted in Colombia, located 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/body/inversionista/espanol/gobierno-corporativo/principales-accionistas/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.- 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, Counter-Terrorism Financing and Proliferation of Weapons of Mass Destruction (hereinafter, **SARLAFT**) which contemplates complying with 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 the best practices in this area, mainly Financial Action Task Force (FATF) rules.

The policies, controls and procedures implemented, seek to prevent the use of the Entity for the appearance of legality of assets derived from criminal activities or the channeling of resources used for carrying out terrorist activities.

The risk system consists of two key phases: (a) Risk prevention aimed to prevent resources from activities related to money-laundering and the financing of terrorism or from the financing of proliferation of weapons of mass destruction from coming into the Entity (hereinafter AML/CTF), and (b) The control oriented 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 SARLAFT 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 SARLAFT are stipulated in the Code of Conduct and SARLAFT Policies 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 risk attributable to the Entity which is intended to establish the relationship and contains the prohibition to begin or maintain 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.

- **AML/CTF stages**

SARLAFT 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.

- **Audit and Control**

The Entity has bodies and instances responsible for conducting the AML/CTF evaluation, so its shortcomings or weaknesses can be identified and reported to whom it corresponds 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 who are aligned with its principles and values of zero tolerance for corruption. This position is transferred to these third parties through the inclusion of specific anti-corruption clauses in contracts, engagement letters and other documents with similar purpose.

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

- (a) Personal Benefits may not be given, promised, offered or accepted, directly or indirectly, that may have the purpose of:
 - i. Facilitating or favouring the improper acquiring or retention of a business, contract, interest or advantage in favour of the Entity or by the Entity; or
 - ii. Influencing, for that purpose, those who have decision-making capacity.
- (b) No payment may be accepted or requested from third parties that are unjustified or that involve the payment of commissions or compensation other than those derived from the provision of products and services inherent to the Entities activity.
- (c) No employee may be subject to retaliation or suffer any other adverse consequences for refusing the request, making or accepting improper payments.
- (d) It is not permitted to provide illegitimate favours or advantages to entities or persons with which the Entity maintains or may maintain contractual or business relations.
- (e) It is not acceptable to take advantage of a position in the Entity or a personal relationship to try to influence Public Employees or individuals, including the Entities employees, in order to get them to carry out improper conducts in favor of the Entity or for the personal benefit of the holder of said position.
- (f) One must act with respect, diligence and prudence in relations with Public Employees, particularly if they adopt or may adopt resolutions and decisions that directly or indirectly affect the Entity. Under no circumstances may a Public Employee be offered, given, promised, directly or indirectly, a donation, promise, advantage or benefit of any kind that redounds to his or her own benefit or that of another person, so that he or she: (i) performs or omits acts contrary to his or her obligations; or, (ii) performs or omits acts inherent to his or her position or employment, without breaching or failing to comply with his or her obligation.
- (g) Conflicts of Interest must be identified and managed in accordance with the provisions established in the General Conflicts of Interest Policy. If an employee finds themselves in a situation of Conflict of Interest, or believes that this may be perceived as such, they must always report it to their direct manager and record it through the tools that the BBVA Group makes available to them. In case of doubt, it is advisable to contact the Compliance unit through the Code of Conduct Consultation Channel.

The entity expressly prohibits the offering, promise, delivery and acceptance of a request for direct or indirect facilitation of 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 development of the above, the Entity facilitates and provides its employees and managers with training programs aimed at promoting the values of BBVA, its ethic culture in all markets in which it participates, anti-corruption, promotion of free competition, sustainability, protection of personal data and AML/CTF risk management.

8.- Protection of Personal Data

In development on what is provided in the Constitution and laws in the matter of Data protection, the Entity has its own Personal Data Protection Policies which determines the guidelines to which it is obliged, among others, to : (i) keep confidential information provided by financial customers which is considered confidential in the terms established in the corresponding regulations, without prejudice to its supply to the competent authorities, and (ii) to have the appropriate electronic means and controls to provide security to transactions, to the confidential information of financial customers and to the networks that contain it.

The Personal Data Processing Policy defines and establishes a set of specific rules and procedures that have been adopted by the Entity, with the purpose of protecting and ensuring the appropriate treatment of personal information that as a result of the development of its business activities, has been obtained from its customers, shareholders, employees, directors, suppliers, users or any other person with whom it has a relationship. BBVA is committed to respecting the rights of their customers, employees and third parties in general.

9.- Sustainability

The Entity has a sustainability policy based on its contribution to the United Nations 2030 Agenda for Sustainable Development. As a sign of this aspiration, it has signed up to various international commitments such as the Principles for Responsible Banking and the Net-Zero Emissions Banking Alliance promoted by the United Nations, among others. The Entity understands “sustainable development” (or “sustainability” in general) as meeting the needs of the present generation without compromising the ability of future generations to meet their own needs.

10.- 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 them 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 MEZA CUERVO

Executive Vice President of Internal Control & Compliance
Compliance Officer
March 2025