

ANTI-MONEY LAUNDERING AND TERRORISM FINANCING COMPLIANCE PROGRAM CERTIFICATION

Banco Davivienda S.A. is a Financial Institution duly established in accordance with Colombian law and is regulated by the Financial Superintendence of Colombia.

The Bank has implemented a Compliance Program as part of its Organizational culture. This system has been structured by means of tools and instruments promulgated through policies and procedures focused on the prevention, detection and reporting of operations related to Money Laundering and Financing of Terrorism, thus complying with the regulatory framework established in Colombian law, such as the Comprehensive Statute on the Colombian Financial System [E.O.S.F. in its Spanish acronym] (Decree No. 663 of 1993), External Bulletins 022, 061 of 2007 and 026 of 2008 and other norms issued by the Financial Superintendence of Colombia, as well as by the recommendations and international best practices available in this matter, especially those proffered by GAFI and GAFISUD.

The operations developed by the Bank are framed within its ethical and internal control standards, which in turn rest on a core of healthy banking and money laundering and terrorism financing prevention practices, in fulfillment of commercial goals. The guidelines and work instructions for the application of the Compliance Program are contained in the Compliance Manual and the Code of Conduct and Ethics approved by the Bank's Board of Directors, which are binding on all officers of the institution.

Knowledge of Customers:

The Compliance manual contemplates policies for binding, updating, monitoring, and cancelling products when the objective and reasonable causes foreseen by the Entity related to breaches in the compliance program arise. Similarly, due diligence mechanisms have been structured that are known to its customers, partners, and counterparts during binding processes, updating, validating information, and monitoring, among others. Due diligence establishes reinforced measures of knowledge and approval by senior employees, for those customers who, because of their profile or the functions they perform, may expose the entity to a greater degree to LA/FT risk, such as High Risk Activities and Public or Politically Exposed Persons, High Risk Jurisdictions, among others.

Monitoring Function:

Banco Davivienda S.A. monitors the transactional behavior of its customers, products, channels, and jurisdictions with the objective of identifying and analyzing unusual operations. It also has objective criteria for determining suspicious operations which are reported to the Financial Information and Analysis Unit (UIAF). For customers with a higher risk profile, a reinforced monitoring scheme has been put in place.

Training:

The Directorate of Banco Davivienda S.A. acknowledges the importance of SARLAFT training for all its employees, in view of their active role in the fight against Money Laundering and Financing of Terrorism.

In accordance with the foregoing, all Banco Davivienda S.A. employees are trained in the prevention of Money Laundering and Financing of Terrorism, from the areas responsible for implementing the Compliance Program to the different areas and salesforces, as well as new employees during the onboarding process.

Organizational Structure:

The Senior Directorate, the Board of Directors, the Legal Representatives, the Compliance Officer, and each one of the Entity's employees have specific roles and responsibilities that enable the effective and efficient operation of the Entity's compliance program.

To develop the functions set forth by legal rules regarding SARLAFT and aware of their commitment to the Compliance Program, the Board of Directors of Banco Davivienda S.A. has appointed a Compliance Officer and their alternate, who are duly appointed before the Superintendence of Finance of Colombia.

Audit and control:

The Bank is subject to surveillance and inspection by the Superintendence of Finance of Colombia, which visits it to validate compliance and proper implementation of the Compliance Program.

The control entities, such as Internal Audit and External Audit, have included in their permanent planning the review of the execution of the Entity's Compliance Program, generating periodic reports directly to the Bank's Board of Directors and management.


Recordkeeping:

The Entity has provided tools and mechanisms for document preservation of the stages and constituent elements of the compliance program, which include information security measures ensuring the integrity, timeliness, reliability, and controlled availability of information. Similarly, information on customers and their transactions is kept in accordance with the parameters provisioned by law.

Anti-corruption and Anti-bribery Policy:

As a fundamental pillar of the Anti-Corruption Program, Banco Davivienda S.A. has adopted a commitment to zero tolerance regarding any corruption event, through the generation of policies prohibiting bribery in any of its forms, whether direct or indirect,

through its employees, collaborators, customers, suppliers, and other stakeholders, similarly, there are policies regulating events of conflict of interest that may arise relating to a public official or persons from the private sector.



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