Bancolombia

In response to your request, we hereby inform you that Bancolombia, in its capacity as an entity supervised by the Financial Superintendency of Colombia, has adopted and implemented an Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation Financing Risk Management System (SARLAFT), designed under a risk-based approach and in accordance with applicable Colombian regulations, the instructions issued by said authority, the recommendations of the Financial Action Task Force (FATF), and international best practices.

This system includes policies and procedures for customer and counterparty identification and due diligence; the identification of beneficial owners and persons with decision-making authority within such counterparties; the determination and updating of risk profiles; the segmentation of customers, products, channels, and jurisdictions; the application of enhanced due diligence measures in connection with higher-risk exposures; screening against restrictive lists and economic sanctions lists; and the monitoring of transactional activity to identify and analyze unusual domestic and international transactions. When, as a result of the corresponding analyses, a transaction is determined to be suspicious, a report is submitted to the competent authority in accordance with the terms established under applicable regulations.

In addition to SARLAFT, Bancolombia has an Economic Sanctions Program aimed at managing risks arising from the application of international sanctions regimes, in accordance with their scope and applicability, as well as at adopting international standards and best practices in this area. The program includes policies, procedures, and controls for the identification, assessment, prevention, and management of exposures associated with persons, entities, countries, territories, sectors, activities, and transactions subject to sanctions or restrictive measures, in accordance with the applicable legal framework and the commitments undertaken by the Entity in the course of its commercial and financial relationships.

Additionally, the risk prevention system includes corporate governance, training, audit, and control mechanisms aimed at assessing its proper implementation and operation.

In the context of its correspondent banking relationships, Bancolombia applies risk-based due diligence and assessment processes and has protocols in place for establishing and maintaining such relationships, in accordance with SARLAFT regulations and FATF standards. Bancolombia also responds to the due diligence processes and information requests made by such entities. In addition, it observes and complies with the policies and conditions established by correspondent banks as requirements applicable to these relationships.

Notwithstanding the foregoing, Bancolombia is subject to its legal obligations relating to bank secrecy, confidentiality, and the protection of information. Accordingly, Bancolombia cannot comment on the existence or content of suspicious transaction reports, specific relationships or circumstances concerning its customers, or any information subject to secrecy or confidentiality requirements.

VIGILADO SUPERINTENDENCIA FINANCIERA DE COLOMBIA BANCOLOMBIA S.A. Establecimiento Bancario

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