

## AML/ CFT QUESTIONNAIRE

The following questionnaire is intended to facilitate our understanding of the Anti Money Laundering Policies and Procedures your institution implements. Information collected will be used for our internal compliance purposes only. Note: If you answer "No" to any question, additional information can be supplied at the end of the questionnaire or by annex. We thank you in advance for your cooperation and your reply.

<b>Institution Information</b>	
Institution Name:	<b>BANCO DE BOGOTA</b>
Head Office Address:	CL. 36 #7-47
Telephone	(571) 3320032
Web Site:	www.bancodebogota.com.co
Registration/License No.	860002964-4
Swift Address:	BBOGCOBB
Date of establishment/incorporation	15/11/1870
Are there any specific laws in your country on Anti-Money Laundering? Y If yes, please list the major laws enacted for AML and terrorist financing in your country.	<ul style="list-style-type: none"> <li>○ FATF Recommendations</li> <li>○ Basic Legal Circular (C.E. 007 of 1996)</li> <li>○ External Circular 025 of 2003 SIPLA</li> <li>○ External Circular 026 of 2008 SARLAFT</li> <li>○ External Circular 029 of 2014 SARLAFT</li> <li>○ External Circular 027 of 2020 SARLAFT</li> <li>○ Colombian Criminal Code</li> <li>○ Statutory law of the Financial System (Articles 102-107)</li> <li>○ Confiscate property related to money laundering or financing of terrorism</li> </ul>
Has your institution appointed a senior officer responsible for its Anti-Money Laundering and Anti-Terrorist Financing program? Y/N. Y If yes, please provide the person's name, position, title, mailing address, telephone number and e-mail address.	Luis Bernardo Quevedo Quintero Compliance Officer Address Cll. 36 # 7-47 Tel (571) 3320032 Ext. 51474 bquevedo@bancodebogota.com.co
Has the Financial Institution established a program for money laundering prevention?	Yes
Regulatory body:	<b>Financial Superintendence of Colombia</b>
Is your institution operating under offshore banking license?	No
Name of external auditor(s)	KPMG
Is your institution's shares listed on any stock exchange markets? Please provide name of exchange and symbol	<input type="checkbox"/> No <input checked="" type="checkbox"/> YES → Please provide the information below.  Name of stock Exchange : Bolsa de Valores de Colombia - BBO
Do the responses provided apply to your institution's domestic banking subsidiaries and branches in the country of head office jurisdiction? Y/N	Yes

If you answered "No" to previous question, please provide the name, location and contact details for the branches and/or subsidiaries that are not represented by this questionnaire.

Please, provide a Board members list as well as Executives list including name, position and time in that position.

## Board of Directors

Principal Members	Alternate Members
Luis Carlos Sarmiento Gutiérrez (Equity Member)	Jorge Iván Villegas Montoya
Sergio Uribe Arboleda*	Sergio Arboleda Casas*
Alfonso de la Espriella Ossio	Ana María Cuellar de Jaramillo
Carlos Arcesio Paz Bautista (Equity Member)	Álvaro Velásquez Cock
José Fernando Isaza Delgado*	Carlos Ignacio Jaramillo Jaramillo*

\* Independent member

## Executive Officers

Name	Charge
Alejandro Figueroa	Chief Executive Officer
Germán Salazar Castro	Executive Vice-president CFO - Strategy & Financial Planning Vice-president
María Luisa Rojas Giraldo	Financial Control & Regulation Vice-president
Germán Salazar Castro	International & Treasury Vice-president (E)
Isabel Cristina Martínez Coral	Sustainability & Corporate Services Vice-president
Gerardo Hernández Correa	Legal Vice-president
Rafael Arango Calle	Enterprise Banking Vice-president
Mauricio Fonseca Saether	Consumer & SME Banking Vice-president
César Castellanos Pabón	Credit Vice-president
Oscar Bernal Quintero	Technology Vice-president
Herbert Francisco Dulce Ospina	General Comptroller
José Joaquín Díaz Perilla	Legal Counsel
Juanita Cubides Delgado	General Secretary

Please, provide a List of Shareholders holding more than 10% shares in your institution. (Including name, share holding and date of incorporation)

## Ownership

Main Shareholders as of march 31, 2020

Shareholder	Number of Shares Owned	% Participation
GRUPO AVAL ACCIONES Y VALORES S.A.	227.710.487	68.74%
CONSULTORÍAS DE INVERSIONES S.A.	32.140.397	9.70%

Who is the ultimate beneficial owner of your institution?

- Mr. LUIS CARLOS SARMIENTO ANGULO, with Colombian ID ("Cédula de Ciudadanía") No. 119.766 issued at Bogotá, is registered before the Bogota's Chamber of Commerce as the only controller of GRUPO AVAL ACCIONES Y VALORES S.A., the aforementioned in compliance with the Colombian Commercial Code and other applicable commercial law.

In the past two years, has the FI received any action against it, resulting from violations of laws or regulations concerning money laundering or terrorist financing? If yes, please explain.	<b>Yes</b>	<b>No</b> X
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<b>I. General AML Policies, Practices and Procedures:</b>	<b>Yes</b>	<b>No</b>
Does the AML compliance program require approval of the financial institution's board or a senior committee thereof?	X	
Does the FI have a legal and regulatory compliance program that includes a designated Compliance Officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the financial institution?	X	
Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that have been approved by senior management?	X	
Does the FI have self-assessment procedures as part of its internal control environment to assure compliance with applicable laws and internal policies?	X	
In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	X	
Does the FI have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	X	
Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	X	
Does the FI have appropriate record retention procedures pursuant to applicable law?	X	
Does the FI have a Code of Conduct and representations by their employees of their understanding and agreement to abide by the Code of Conduct including AML provisions?	X	

Do your policies and procedures meet the current recommendations of the FATF?	X	
Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?	X	
<b>II. Risk Assessment</b>	<b>Yes</b>	<b>No</b>
Does the FI have a risk focused assessment of its customer base and transactions of its customers?	X	
Does the FI identify the categories of customers whose transactions and banking activities are routine and usual?	X	
Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the financial institution?	X	
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	<b>Yes</b>	<b>No</b>
Has your institution implemented a know-your-customer program that is designed to obtain reliable and independent information to verify the true identity of your customers and its customer's business activities?	X	
Does the know-your-customer program require enhanced due diligence to be undertaken for certain customers that may present a higher level of money laundering and/or terrorist financing risk to your institution?	X	
Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number, occupation, age/date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?	X	
Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	X	
Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	X	
For legal entities, does the FI obtain copies of the constitutive documents of their customers?	X	
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	<b>Yes</b>	<b>No</b>
Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X	
Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	X	
Does your institution maintain lists of individuals/entities (control lists - e.g. suspected terrorists and money launderers, which may include persons, entities or countries that are contained on lists issued by government/international bodies), to whom/which you are prohibited from providing financial services or with whom/which you are prohibited from conducting financial transactions.	X	
Does your institution provide or maintain correspondent banking products/services to, with or for the benefit of, or on the direction or order of, an Iranian Financial Institution or a subsidiary of an Iranian Financial Institution?  <input checked="" type="checkbox"/> No <input type="checkbox"/> YES → Please list the name of each Iranian Financial Institution or subsidiary thereof		

<p>If "Yes" to previous question, does your institution apply enhanced due diligence measures to transactions emanating from or destined to Iran?</p> <p><input type="checkbox"/> No  <input type="checkbox"/> YES → Provide details:</p> <p>Not yet. Provide details and expected date of Iran EDD Implementation</p>		
<p>Are there any sanctioned jurisdictions or high risk country amongst the countries where your institution or your institution's customer conducts business? If yes, please specify the countries and types of business activities.</p> <p><input checked="" type="checkbox"/> No  <input type="checkbox"/> YES → please specify the countries and type of business below:  Country:  Business activity:</p>		
<p>Does the FI have automated systems to screen all transactions (originators and beneficiaries) against control lists which may include persons, entities or countries that are contained on lists issued by government/international bodies or agencies of known or suspected terrorists and narcotics traffickers prior to conducting a transaction?</p>	X	
<p>Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)</p>	X	
<p>Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?</p>	X	
<p>Does the FI have policies to reasonably ensure that transactions are not conducted with countries that appear as sanctioned entities on lists provided by government and/or international bodies?</p>	X	
<p>Does the FI have policies to ensure that it will not conduct transactions with or provide downstream products and services to other FI's that do not comply with industry best practices? (Downstream products are defined as a and correspondent banking client who receives correspondent banking services from an institution and itself provides correspondent banking services to other financial institutions in the same currency as the account it maintains with the institution).</p>	X	
<p>Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?</p>	X	
<p><b>V. Transaction Monitoring and Sanctions Screening</b></p>	<b>Yes</b>	<b>No</b>
<p>Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travelers' checks, money orders, etc.)</p>	X	
<p>Does the FI have a sanctions screening system to automatically detect a transaction which may involve any sanctioned party?</p> <p><input type="checkbox"/> No  <input checked="" type="checkbox"/> YES → please provide the name of the sanction screening system.  System Name: CRM</p>	X	

How frequently does the FI review or update AML policies and procedures? The policy is updated annually or earlier when deemed necessary.															
As a measure to mitigate AML risk, does your institution have any policies to mitigate AML risks associated with business activities of your institution, or your customers, located in a sanctioned jurisdiction or a high risk country? <input type="checkbox"/> No <input checked="" type="checkbox"/> YES															
Does the FI have a system and control to request and record beneficial owner details for all corporate and correspondent customers?	X														
Does the FI screen beneficial owners against sanctions lists or PEPs database?	X														
Please describe risk classifications (e.g. high/ medium/ low) and frequency of a periodical review (e.g. 6/12/ 18/ 24/ 36 months).															
<table border="1"> <thead> <tr> <th colspan="4">CLIENT RISK CLASSIFICATION</th> </tr> <tr> <th>UNACCEPTABLE</th> <th>HIGH</th> <th>MEDIUM</th> <th>LOW</th> </tr> </thead> <tbody> <tr> <td rowspan="2">UN-OFAC Lists</td> <td>PEP's</td> <td rowspan="2">Clients with FATF risk activities (Individual Person, Legal Person)</td> <td rowspan="2">Others</td> </tr> <tr> <td>Political Campaings</td> </tr> </tbody> </table>			CLIENT RISK CLASSIFICATION				UNACCEPTABLE	HIGH	MEDIUM	LOW	UN-OFAC Lists	PEP's	Clients with FATF risk activities (Individual Person, Legal Person)	Others	Political Campaings
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<b>VI. AML Training</b>	<b>Yes</b>	<b>No</b>													
Does the FI provide AML training to it's employees and agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering as well as the process to report suspicious transactions?	X														
Does the FI retain records of its training sessions including attendance records and relevant training materials used?	X														
Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X														
Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI 's products and services and internal policies to prevent money laundering?	X														
Has the FI participated in /attended industry/government AML seminars?	X														
Does the FI employ third parties to carry out some of the functions of the FI?		X													
If the answer to previous question is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering</li> </ul>															
<b>VII. Sanctions Compliance</b>	<b>Yes</b>	<b>No</b>													
Does the FI have a documented sanctions policy which is approved by the Board of directors?	X														

Is the policy aligned with the Bank's risk profile and being updated regularly to reflect changes in sanctions laws /Requirements?	X	
Does the policy cover all branches and subsidiaries at both the head office countries where the FI operates?	X	
Does the FI have qualified individuals responsible for day-to-day management of the sanctions program?	X	
Does the FI have presence, direct / indirect links or do you intend to carry out operations in these countries? If yes, provide all details <ul style="list-style-type: none"> <li>• Cuba</li> <li>• Irán</li> <li>• Myanmar (Burma)</li> <li>• North Corea</li> <li>• Syria</li> <li>• Sudán</li> </ul>		X
<b>VIII Anti-Bribery and Corruption (ABC) Program</b>	<b>Yes</b>	<b>No</b>
Does the FI have an ABC compliance program?	X	
If the answer to previous question is yes, is this policy applicable to subsidiaries, branches and affiliates	X	
Does the FI have an individual(s) responsible for the implementation and compliance with the ABC Program?	X	
Does the FI provide training on ABC risks and its ABC Program requirements to all employees on a regular basis?	X	
Does the FI monitor effectiveness of the ABC Program?	X	
Has the FI been subject to an internal or external investigation in the last 3-5 years which related to potential violations of applicable ABC laws?		X
Does the FI perform a periodic ABC risk assessment (e.g. enterprise –wide, business line, etc.)?	X	
If No, please provide information on how the FI mitigate ABC Risks:		
Does the FI have a confidential whistleblowing line that is available to all employees?	X	
Does the FI have a whistleblower policy?	X	
<b>We confirm that we are authorized to complete this document, and the above information currently and accurately reflects our institution's AML/CFT policies and ABC Program</b>		
<b>Date: September 2021</b>		
<b>Name: Diego Francisco Jurado Gutierrez</b>		
<b>Title: Compliance Officer (Substitute)</b>		
<b>Signature:</b> 		