CERTIFICATION ON THE ANTI-MONEY LAUNDERING, COUNTER-TERRORIST FINANCING, AND FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION COMPLIANCE PROGRAM

Davivienda Group

The entity has implemented a compliance program as part of its organizational culture. This system is structured through tools and instruments disseminated through policies and procedures aimed at the prevention, control, detection, and reporting of transactions related to Money Laundering, Terrorist Financing, and Proliferation of Weapons of Mass Destruction, which is subject to continuous evaluation, thereby complying with international recommendations and best practices in this matter, particularly those issued by the FATF.

The operations carried out by the entity fall within ethical and internal control standards centered on sound practices and the prevention of money laundering and terrorist financing relative to the achievement of commercial objectives. The working guidelines and instructions for the application of the Compliance Program are set forth in the Compliance Manual and in the Code of Conduct and Ethics approved by the Entity's Board of Directors, which are mandatory for all employees of the Entity.

Know Your Investment / Customer:

The Compliance Manual provides policies for onboarding, updating, monitoring, and canceling investments / products when the objective and reasonable grounds established by the Entity related to violations of the compliance program are met. Likewise, due diligence mechanisms have been structured to know its investments, customers, partners, and counterparties during the onboarding, updating, information validation, and monitoring processes, among others. Due diligence establishes enhanced measures of knowledge and approval by higher-ranking officers for those investments / customers that, due to their profile or the functions they perform, may expose the entity to a greater degree of ML/TF risk, such as High-Risk Activities, Politically Exposed Persons, High-Risk Jurisdictions, among others.

Monitoring Function:

The entity monitors the transactional behavior of its investments, customers, products, channels, and jurisdictions in order to identify and analyze unusual transactions; likewise, it has objective criteria for determining suspicious transactions, which are reported to the respective entity. For investments / customers with a higher risk profile, an enhanced monitoring scheme has been established.

Training:

The entity recognizes the importance of training in anti-money laundering and counter-terrorism programs for all of its employees, in consideration of their active role in the fight against Money Laundering, Terrorist Financing, and the Proliferation of Weapons of Mass Destruction. In accordance with the foregoing, all employees of the entity are trained in the prevention of crimes related to ML/TF—training that is disseminated to the areas

responsible for implementing the Compliance Program, extending across the various commercial areas and sales forces, as well as to new employees during the induction process.

Organizational Structure:

Senior Management, the Board of Directors, the Legal Representatives, the Compliance Officer, and each employee of the Entity have specific roles and responsibilities that enable the effective and efficient operation of the Entity's compliance program. For the performance of the functions established by legal regulations regarding the program for the prevention of money laundering and proliferation of terrorist financing, and mindful of their commitment to the Compliance Program, the Board of Directors of Banco Davivienda S.A. has appointed a Compliance Officer and their alternate.

Audit and Control:

The entity is subject to supervision and inspection by the respective supervisory body, which conducts visits to validate compliance and the proper implementation of the Compliance Program. Control bodies, such as Internal Audit and External Audit, have incorporated the review of the execution of the Entity's Compliance Program into their permanent planning, generating periodic reports directly to the Board of Directors and the entity's management, which are used to continually improve the controls and procedures defined by the entity.

Record Retention:

The Entity has established tools and mechanisms for the documentary retention of the stages and constituent elements of the compliance program, which incorporate information security measures that ensure the integrity, timeliness, reliability, and controlled availability of information. Likewise, information regarding investments and their transactions is retained in accordance with the parameters set forth by law.

Anti-Corruption and Anti-Bribery Policy:

As a fundamental pillar of the Anti-Corruption Program, the entity has adopted a zero-tolerance commitment against any act of corruption, through the creation of policies prohibiting bribery in any form, whether direct or indirect, through its officers, employees, investments, clients, suppliers, and other stakeholders. Likewise, it has policies regulating conflict of interest situations that may arise in relation to public officials or individuals in the private sector; to this end, the program includes procedures, controls, and employee training programs that ensure compliance with such policies.

Sincerely,

DAVIVIENDA GROUP
February 2025