the Wolfsberg Group

Financial Institution Name: Location (Country) : Banco de Comercio Exterior de Colombia SA - Bancoldex Colombia

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

1. ENTITY 1		Answer
	& OWNERSHIP	
2	Full Legal Name	
2		L
!		Banco de Comercio Exterior de Colombia SA - Bancoldex
2		
	Append a list of foreign branches which are covered by	
	this questionnaire	
	uns questionnaire	N.A.
		130.
	Full Legal (Registered) Address	
		Calle 28 #13A-15 Bogotá, Colombia
1	Full Primary Business Address (if different from above)	
		N.A.
5	Date of Entity incorporation/establishment	
•	Date of Entity moorporation/establishment	
		January 16th, 1991
5	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	N A
		N.A.
6 b	Member Owned/Mutual	No
3 c	Government or State Owned by 25% or more	Yes
5 d	Privately Owned	No No
3 d1	If Y, provide details of shareholders or ultimate	NO .
Jui		
	beneficial owners with a holding of 10% or more	N.A.
		No.
7	% of the Entity's total shares composed of bearer shares	
	TO THE STATE OF THE PROPERTY O	
		N.A.
8	Door the Entity or any of its based on	
0	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es	
- u	which operate under an OBL	•
	minor operate and of an OBE	N.A.
•		
9	Does the Bank have a Virtual Bank License or provide	no
10	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
		Superintendencia Financiera de Colombia (Financial Superintendency of Colombia)
11	Provide Legal Entity Identifier (LEI) if available	
	8 27	
		NIT 800.149.923-6
	Provide the full legal name of the ultimate parent (if	
12	i revide die fun legal fiame of the ultifiate parent (If	I.
12	different from the Entity completing the DDO	
12	different from the Entity completing the DDQ)	N A
12	different from the Entity completing the DDQ)	N.A.
		N.A.
	Jurisdiction of licensing authority and regulator of	N.A.
	Jurisdiction of licensing authority and regulator of	N.A.
	Jurisdiction of licensing authority and regulator of	
13	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity	N.A.
13 14 14 a	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking	N.A.
13 14 14 a 14 b	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking	N.A. No No
14 14 a 14 b 14 c	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking	N.A. No No Ves
14 14 a 14 b 14 c 14 d	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking	N.A. No No No Yes No
14 14 a 14 a 14 b 14 c 14 d	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking	N.A. No No Yes No No No
14 14 a 14 a 14 b 14 c 14 c 14 c	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Financial Markets Trading	N.A. No No Yes No No Yes
14 14 a 14 b 14 c 14 d 14 e 14 f 14 f	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Investment Banking Financial Markets Trading Securities Services/Custody	N.A. No No Yes No No yes No No No No Yes No
14 14 a 14 b 14 c 14 d 14 e 14 f 14 f	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Financial Markets Trading	N.A. No No Yes No Yes
14 14 a 14 a 14 b 14 c 14 d 14 e 14 f 14 f 14 g	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Investment Banking Financial Markets Trading Securities Services/Custody	N.A. No No Yes No No yes No No No No Yes No
14 14 a 14 b 14 c 14 c 14 d 14 e 14 f 14 g 14 h	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank	No. No. No. No. Yes No.
14 14 a 14 b 14 c 14 c 14 d 14 c 14 q 14 q 14 h 14 q	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management	N.A. No No No Yes No
13 14 14 a 14 b 14 c 14 c 14 d 14 e 14 f 14 g 14 h 14 i	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank	No. No. No. No. Yes No.
	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking Private Banking Commercial Banking Transactional Banking Investment Banking Financial Markets Trading Securities Services/Custody Broker/Dealer Multilateral Development Bank Wealth Management	No. No. No. No. Yes No.



		Y
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	l · · · · · · · · · · · · · · · · · · ·
	more than 10% of its revenue from non-resident	No
	customers? (Non-resident means customers primarily	140
	resident in a different jurisdiction to the location where	
	bank services are provided)	
15 a	If Y, provide the top five countries where the non-	
	resident customers are located.	
	8 8 200/08	N.A.
16	Select the closest value:	
16 a	Number of employees	201-500
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different
	Transfer of the second	nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking
		services. This trust company applies the general AML/CTF policies established by the Bank.
18	If appropriate, provide any additional information/context	
	to the answers in this section.	lara
		N.A.
2. PRODI	JCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	No
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	N
	services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to	No
	provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	No
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking	No
	services to foreign banks?	110
19 a1e	Does the Entity allow downstream relationships	No
	with foreign banks?	170
19 a1f	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	No The state of th
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
	services to regulated Money Services Businesses	No
	(MSBs)/Money Value Transfer Services	
19 a1h	Does the Entity allow downstream relationships	
	with MSBs, MVTSs, or Payment Service Provider	
	(PSPs)?	。 [1] [1] [1] [1] [1] [1] [1] [1] [1] [1]
19 a1h1	MSBs	No
19 a1h2	MVTSs	No -
19 a1h3	PSPs	No



19 at 1 Does the Entity have processes and procedures in the processes and procedures in the processes and procedures in the processes of			
MSS_AMA_TS_PSP	19 a1i	Does the Entity have processes and procedures	
MSS_AMA_TS_PSP		in place to identify downstream relationships with	No
19 b Cross-Border Repairmes No			
19.4 Cross-Struct Remittances No	19 b		No.
19			
19			
19			
19			
19 h Psychole Trough Accounts No			
offer third party payment services to the customers? No 19.11 19.17 19.17 19.18 19.19 19.19 19.19 19.19 19.10 1			
offer third party payment services to their outstorners? 19 II. If Y, pieces existed all that apply below? 19 II. Third Party Payment Service Providers No. 19 III. Virtual Asset Service Providers (VASPs) No. 19 III. Common Perse explain 19 II. Private Banding 19 II. Private Banding 19 II. Private Banding 19 III. Sported Valida Instruments 19 I			No
19 II II II Y, please select all that apply below? 19 IZ Third Party Payment Services Providers (NSPs) 19 Virtual Asset Service Providers (NSPs) 19 No 19 Per Payment Services Providers (NSPs) 19 No 19 Per Payment Services Providers (NSPs) 19 Per Payment Value Instruments 19 Per Instruments 19 Per Instruments 19 Per Instruments 19 Per Payment Value Instruments 19 Per Instru	19 i	Payment services to non-bank entities who may then	
19 13 Third Party Payment Services Providers (NASPs) No 19 14 eCommerce Platforms No 19 14 eCommerce Platforms No 19 15 Ofter - Please explain No 19 16 Private Banking 19 1 Private Banking 19 1 Private Banking 19 1 Remote Separate (RCC) No 19 1 Sponsoring Private ATMS No 19 1 Sponsoring Private ATMS No 19 1 No 19 1 Sponsoring Private ATMS No 19 1 Trade Flances No 19 1 Trade Flances No 19 1 Trade Flances No 19 1 Order Assets No 19 1 Order No 19 1		offer third party payment services to their customers?	No .
1912 Third Party Payment Service Providers (VASPs) No 1914 eCommore Platforms No 1916 Other - Please explain 1916 Other - Please explain 1917 Protest Banking 1918 No 1919 Sponsoring Provider ATMs No 1910 Trade Finance 1910 Trade Financ			
19 12 Third Party Payment Service Providers No 19 14 eCommorce Platforms No 19 15 Other - Please explain 19 16 Other - Please explain 19 17 Private Banking 19 Private Banking 19 Spensoring Private ATMs 19 Spensoring Private ATMs 19 No 19	19 i1	If Y please select all that apply below?	
1918			No.
19 I Private Banking No Other - Please explain 19 I Private Banking No 19 Private Banki			
19 Private Banking No			
19 Private Banking No 19 k Remote Deposit Capture (RDC) No 19 k Remote Deposit Capture (RDC) No 19 l Sponsoring Private ATMS No 18 m Stored Value instruments No 19 p For each of the following please state whether you 19 p For each of the following please state whether you 19 p For each of the following please state whether you 19 p For each of the following please state whether you 19 p For each of the following please state whether you 19 p For each of the following please state whether you 19 p For each of the displeade level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p Store For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of due diligence 19 p For each of the spoliciable level of the diligence 19 p For each of the spoliciable level of the diligence 19 p For each of the spoliciable level of the diligence 19 p For each of the spoliciable level of the dili			NO .
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19 L Remote Deposit Capture (ROC) No 19 II Sponsoring Private ATMS No 19 m Stored Value Instruments No 19 m Stored Value Instruments No 19 c Trade Finance No 19 c Virtual Assets No 19 P For each of the following please state whether you only the private of the district			
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19			
19 m			
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19 o Virtual Assets No 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1 Check cashing service No 19 p1a If yes, state the applicable level of due diligence No 19 p1a If yes, state the applicable level of due diligence No 19 p2 If yes, state the applicable level of due diligence No 19 p3a If yes, state the applicable level of due diligence No 19 p3a If yes, state the applicable level of due diligence No 19 p3a If yes, state the applicable level of due diligence No 19 p3a If yes, state the applicable level of due diligence No 19 p4a If yes yes applicable level of due diligen	19 m		No
19	19 n	Trade Finance	No
For each of the following please state whether you offer the service to walk-in customers and if so, the apolicable level of due diligence: 19 p.1	19 o	Virtual Assets	
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applicable level of dus dillience: No			
19 pt Check cashing service No		applicable level of due dilicence:	
19 pt If yes, state the applicable level of due diligence No	19 n1		No
19 p2			
19 p2a			
19 p3a			
19 p3a			
Sale of Monetary Instruments	19 p3	Foreign currency conversion	No
19 p4	19 p3a	If yes, state the applicable level of due diligend	ne e
If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) NO 20 Confirm that all responses provided in the above Section are representative of all the LF's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank. 21 If appropriate, provide any additional information/context to the answers in this section. N.A. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient experience/expertise Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 c Cash Reporting Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 l Periodic Review Yes 22 l Risk Assessment Yes 23 Risk Assessment Yes	19 p4	Sale of Monetary Instruments	No
If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. 19 q Other high-risk products and services identified by the Entity (please specify) NO 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank. 21 If appropriate, provide any additional information/context to the answers in this section. N.A. 3. AML, CTF & SANCTIONS PROGRAMME 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient experience/expertise Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 c Cash Reporting Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 f EDD Yes 22 g Independent Testing Yes 22 l Periodic Review Yes 22 l Risk Assessment Yes 23 Risk Assessment Yes	19 p4a	If yes, state the applicable level of due diligend	
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19 q Other high-risk products and services identified by the Entity (please specify) 20 Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 a Appointed Officer with sufficient experience/expertise Pes Desenficial Ownership Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 d Cash Reporting Yes 22 d Independent Testing Yes 22 p Independent Testing Yes 22 p Pelicies and Procedures Yes 22 p Pelicies and Procedures Yes 22 p Pelicies and Procedures Yes 22 p Per Screening Yes 22 p Per Screening Yes 22 p Risk Assessment Yes 22 Risk Assessment Yes 22 Risk Assessment			
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20 a Confirm that all responses provided in the above Section are representative of all the LE's branches. 20 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to. 21 If appropriate, provide any additional information/context to the answers in this section. 21 If appropriate, provide any additional information/context to the answers in this section. 22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: 22 Appointed Officer with sufficient experience/expertise Yes 22 Beneficial Ownership Yes 22 C Beneficial Cownership Yes 22 C CDD Yes 22 C DD Yes 22 C DD Yes 22 DD Yes 23 DD Yes 24 DD Yes 25 DD Yes 26 DD Yes 27 DD Yes 28 DD Yes 28 DD Yes 29 DD Yes 29 DD Yes 29 DD Yes 29 DD			N.A.
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22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	20 20 a 21 21 22 a 22 b 22 c 22 d 22 f 22 f	Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	No branches Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank. N.A. Yes Yes Yes Yes Yes Yes
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LES TES	20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 h 22 i 22 i 22 j	Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening	NO No branches Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank. N.A. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
	20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j 22 k	Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	No branches Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank. N.A. Yes Yes Yes Yes Yes Yes Yes Ye



22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	
	CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at	
4	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in	
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	12
26	Does the Entity use third parties to carry out any	No
	components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
	†	l
		N.A.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No branches
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different
	1	nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking
		services. This trust company applies the general AML/CTF policies established by the Bank.
00	If any and the provide any additional life of the life	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	N.A.
	L	Hiero
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Von
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	103
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
33	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	Yes.
	levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	Both Joint Ventures and time parties acting on behalf of the Entity
35 a	Prohibits the giving and receiving of bribes? This	
30 a	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Vas
	improperly intended to influence action or obtain an	103
	advantage	
35 b	Includes enhanced requirements regarding	
T.E. TES	interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of	
	books and records (this may be within the ABC	
	policy or any other policy applicable to the Legal	Yes
	Entity)?	
36	Does the Entity have controls in place to monitor the	
30	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	
•	reporting on the status of the ABC programme?	Yes
20		
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
00 :		
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	N.A.
		O S S S S S S S S S S S S S S S S S S S
39	Does the Entity have an ABC residual risk rating that is	
	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk	
40.	components detailed below:	
40 a	Potential liability created by intermediaries and other	Yes
40 b	third-party providers as appropriate	
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly	Voc
	or through intermediaries	100
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities	Yes
	or public officials	
40 d	Corruption risks associated with gifts and hospitality,	
and 175	hiring/internships, charitable donations and political	Yes
	contributions	
40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	
41	Does the Entity's Internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	Not Applicable
	subject to ABC risk have been outsourced	
	Non-employed workers as appropriate	Yes
42 f		
42 f	(contractors/consultants)	165

43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general ABC policies established by the Bank.
45	If appropriate, provide any additional information/context to the answers in this section.	N.A.
5. AML.	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	Not Applicable
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	Not Applicable
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes



49 [
	Define the process for escalating financial crime risk	
0.00	issues/potentially suspicious activity identified by	Yes
	employees	
40.1		
49 j	Define the process, where appropriate, for	L.
	terminating existing customer relationships due to	Yes
	financial crime risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity,	Yes
		100
	including foreign branches and affiliates	
49	Define the process and controls to identify and	
	handle customers that were previously exited for	Yes
	financial crime reasons if they seek to re-establish a	163
	relationship	
49 m	Outline the processes regarding screening for	
45 111		Yes
	sanctions, PEPs and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal	
70 11	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Voc
an M	comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
VI U	in 1, milet is the retendent period?	
		5 years or more
		o years or more
		5
52	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	lao pignones
52 a	If N, clarify which questions the difference/s relate to	
0 L u	and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different
	and the branches that this applies to.	nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking
		services. This trust company applies the general AML/CTF policies established by the Bank.
	If annualista annual annual distance information for the	
53	If appropriate, provide any additional information/context	
+5000		
-100	to the answers in this section.	la .
-100	to the answers in this section.	N.A.
-ma	to the answers in this section.	N.A.
		N.A.
	to the answers in this section. TF & SANCTIONS RISK ASSESSMENT	N.A.
6. AML, C	TF & SANCTIONS RISK ASSESSMENT	N.A.
	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent	N.A.
6. AML, C	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
6. AML, C 54	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
6. AML, C	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
6. AML, C 54	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
6. AML, C 54 54 a 54 b 54 c	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Yes
6. AML, C 54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 65 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 64 d 55 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 5 56 a 56 b 55 c 55 d	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes Yes Yes Yes
6. AML, C 54 54 a 54 b 54 c 64 d 55 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 5 56 a 56 b 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 5 56 a 56 b 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
6. AML, C 54 54 b 54 c 54 d 55 55 55 a 55 c 55 d 55 c	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
6. AML, C 54 54 54 55 55 65 65 65 65 65 65 65 65 65 65 65	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Dilligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
6. AML, C 54 54 54 55 55 65 65 65 65 65 65 65 65 65 65 65	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
6. AML, C 54 54 54 55 55 55 65 65 65 65 65 65 65 65 65 66 66	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 f 55 g 55 h	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes
6. AML, C 54 54 54 55 55 55 65 65 65 65 65 65 65 65 65 66 66	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 54 55 55 55 65 65 65 65 65 65 65 65 65 66 66	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
6. AML, C 54 54 54 55 55 55 65 65 65 65 65 65 65 65 65 66 66	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 54 54 55 55 55 65 65 65 65 65 65 65 65 65 66 66	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
6. AML, C 54 64 a 554 b 54 c 554 d 555 65 a 656 d 55 c 656 d 55 c 656 d 55 a 656 f 55 g 656 h 666	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
6. AML, C 54 54 54 55 55 55 65 65 65 65 65 65 65 65 65 66 66	Does the Entity's AML & CTF EWRA cover the Inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 h 56	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
6: AML, C 54 64 a 54 b 54 c 54 d 55 a 55 a 55 c 55 c 55 d 55 c 55 d 55 a 55 f 55 g 55 h 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 h 56	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 6 55 a 55 b 56 c 55 d 55 g 55 h 56 56 a 57 67 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 a 56 a 57 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
6. AML, C 54 64 a 54 b 54 c 54 d 65 65 a 656 c 65 d 65 c 65 d 65 a 65 f 65 a 65 f 66 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 a 56 a 57 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 a 55 f 55 g 55 f 56 a 57 a 57 a 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
6. AML, C 54 54 a 54 b 54 c 54 d 55 a 55 a 55 c 65 c 65 d 55 e 55 f 56 a 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
6. AML, C 54 64 a 54 b 54 c 54 d 55 a 55 a 55 c 65 d 55 e 55 g 55 h 56 a 57 67 a 57 b 57 c 57 d 68	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
6: AML, C 54 64 a 554 b 554 c 554 d 555 656 a 656 b 556 c 656 d 658 e 667 67 a 67 b 57 c 57 d 58 58 a 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
6. AML, C 54 64 a 54 b 54 c 54 d 55 a 65 b 65 c 65 d 55 e 65 f 65 g 65 h 66 a 57 67 a 57 a 57 d 58 68 a	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes



Signature Section Se			
Section Sect			Yes
Has the Entity's Sanctions EVPRA been completed in the last Sanctions EVPRA were completed. If It's, provide the date when the last Sanctions EVVRA was completed. Confirm that all responses provided in the above Section and recommendation of the completed of the complete of the compl			Yes
Has the Entity's Sanctions EVPA-been completed in the last Sanctions EVPA was completed. 99 a			Yes
Set 1 Products with a set of the customer	59	Has the Entity's Sanctions EWRA been completed in the	
was completed. NA. Confirm that all responses provided in the above Section as the recreterative of all the LEs barrobes. The LES barrobes and the barroches that this applies to and the barroches that this applies to and the barroches that this applies to the barroches to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers in this section. NA. If appropriate, provide any additional information/context to the answers any apply to BANCOLDEX, BANC		last 12 months?	Yes
60 Confirm that all responses provided in the above Section are representative of all the LE a branches 60 a 11N, Cashy withor questions the difference/s relate by and the branches that this applies to the branches that this applies to all the branches that this applies the provides any additional information/context to the answers in this section. 61 If appropriate, provide any additional information/context to the answers in this section. 62 Cose the Entity verify the identity of the customer? 63 Cose the Entity verify the identity of the customer? 64 China the Entity's policies and procedures set out when critical that the provides are procedures as to the when conducting CDD? Select all that septiment of the following one of the provides of the provided and the provide	59 a		
Confirm that all responses provided in the above Section strongerepatative of all the LE's branches 60 a If It, darfly which questions the difference's relate to and the branches that this applies to, 81 and the branches that this applies to, 82 and the propriete, provide any additional information/context to the entowers in this section. 83 Applies the general ARLOTF policies established by the Bank. 84 Does the Entity service and processors and under the company applies the general ARLOTF policies established by the Bank. 85 Applies the general ARLOTF policies established by the Bank. 86 Applies the general ARLOTF policies established by the Bank. 87 AND TO THE THIS POLICIES and Processors and processors and under the CDD must be completed, og. at the time of nobacarding or within 50 days? 86 Applies the general ARLOTF policies established by the Bank. 87 Applies the general ARLOTF policies established by the Bank. 88 Applies the general ARLOTF policies established by the Bank. 89 Applies the general ARLOTF policies established by the Bank. 80 Applies the general ARLOTF policies established by the Bank. 80 Applies the general ARLOTF policies established by the Bank. 80 Applies the general ARLOTF policies established by the Bank. 80 Applies the general ARLOTF policies established by the Bank. 81 Applies the general ARLOTF policies established by the Bank. 82 Applies the general ARLOTF policies established by the Bank. 83 Applies the general ARLOTF policies established by the Bank. 84 Applies the general ARLOTF policies established by the Bank. 85 Applies the general ARLOTF policies established by the Bank. 86 Applies the general ARLOTF policies established by the Bank. 88 Applies the general ARLOTF policies established by the Bank. 89 Applies the general ARLOTF policies established by the Bank. 89 Applies the general ARLOTF policies established by the Bank. 80 Applies the general ARLOTF policies established by the Bank. 89 Applies the general ARLOTF policies established by the Bank.		was completed.	-
Accordance Acc			N.A.
Accordance Acc			v
Accordance Acc	60	Confirm that all respondes presided in the characteristic	
## 17. darky which questions the difference's relate to and the branches that this applies to any additional information to the previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has distinct the properties, provide any additional information to the previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has distinct the properties, and the properties of the properties of the properties. The first company applies the general ARLICTP policies setablished by the Bank. For KYC, CDD and EDD	00	are representative of all the LE's branches	No branches
and the branch/es that this applies to. Previous answers only apply to BANCCLDEX, BANCCLDEX, Banch COLDEX, BANCCLDEX, BA	60 a		
finature and businesses (trust company) and this subsidiary does not offer or receive correspondent be sorrives. This trust company applies the general AML/CTF policies established by the Bank. If appropriate, provide any additional information/context to the answers in this section. N.A. Vest	00 a		Previous answers only apply to BANCOLDEY BANCOLDEY has only 1 local subsidient, which has different
Sancine First frust company applies the general AMUCTF policies established by the Bank.		and the branchies that this applies to.	nature and husinesses (trust company) and this subsidiary does not offer a reason agreement that under the
temporal process and process of the answers in this section. N.A. 7. KYC, CDD and EDD 8.2. Does the Entity verify the identity of the customer? 8.3. Does the Entity socioles and procedures set out when CDD must be completed, e.g. at the time of nobearding or within 30 days? 8.4. Which of the following does the Entity gather and retain or within 30 days? 8.5. A Customer Identity Section 1 and apply. 8.6. A Secreted scirity Vers. 8.6. A Nature of business/employment Vers. 8.6. A Product usage Vers. 8.6. Product usage Vers. 8.6. A Product usage Vers. 8.6. A Product usage Vers. 8.6. A reach of the following identified. 8.6. A real unimate beneficial owners wrifted? Yes 8.6. A real of the following identified on the composition of the following identified. 8.6. A real unimate beneficial owners wrifted? Yes 8.6. A real of the following identified on the composition of the following identified on the following identified on the follow			services. This trust company applies the capacil AM (CTE policies established by the Park
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P. KYC, CDD and EDD		to the answers in this section.	~
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Section	7 KYC C	DD and EDD	
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or within 30 days? 4 Which of the following does the Entity gather and retain when concluding CDD? Select all that apply. 54 b Expected activity Yes 54 c Nature of business/employment Yes 54 c Product Usabo 55 c Purpose and nature of relationship Yes 56 c Source or wealth Yes 55 c Are each of the following identified: 56 a Utilimate beneficial ownership Yes 55 c Authorised signatories (where applicable) Yes 55 c Key controllers Yes 56 d Other relevant parties Yes 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 c Does the due diligence process result in customers reviewing a risk dassification? 67 a Controllers Product Usabo 67 a Geography Yes 67 a Governor Productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions are used to determine the controllers of the productions ar	63	CDD must be sempleted a	V
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64 d Ownership structure			
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Dart of your KYC process? Yes		1	manaduluna and KTC channels, and PEP's status
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68 a3 Trigger event Yes 68 a4 Other No 68 a4a If yes, please specify "Other" N.A. Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? Fig. 1 Onboarding Yes			
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customers for Adverse Media/Negative News? 69 a	69	Does the Entity have a risk based approach to screening	
69 a If Y, is this at: 69 a1 Onboarding Yes		customers for Adverse Media/Negative News?	Yes
69 a1 Onboarding Yes		277	
			Yes
	69 a2	KYC renewal	Yes



69 a3		
	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of automated and manual
	Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of cutomated and manual
		Combination of automated and manual
73	Does the Entity have policies, procedures and	
.	processes to review and escalate potential matches from	
	screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
	PEPs?	
74	Is KYC renewed at defined frequencies based on risk	
	rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	No
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	100
. 4 40	Strict (Fredeo apoury)	,
		Alerts and red flags
		, as to all a roa rago
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment	EDD on risk-based approach
76 DT		V
	contain the elements as set out in the Wolfsberg	Yes
70.0	Correspondent Banking Principles 2022? Embassies/Consulates	No EDD/gookietian av prohibition
76 c 76 d	Extractive industries	No EDD/restriction or prohibition EDD on risk-based approach
76 e	Gambling customers	Prohibited
		EDD on risk-based approach
76 f	General Trading Companies	
76 g	Marijuana-related Entities	Prohibited
		Parkithed.
76 h	MSB/MVTS customers	Prohibited
76 h 76 i	MSB/MVTS customers Non-account customers	Do not have this category of customer or industry
76 h 76 i 76 j	MSB/MVTS customers Non-account customers Non-Government Organisations	Do not have this category of customer or industry EDD on risk-based approach
76 h 76 l 76 j 76 k	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers	Do not have this category of customer or industry EDD on risk-based approach Prohibited
76 h 76 i 76 j 76 k 76 l	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited
76 h 76 i 76 j 76 k	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited Prohibited
76 h 76 i 76 j 76 k 76 l	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited
76 h 76 l 76 j 76 k 76 l 76 m	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited Prohibited
76 h 76 i 76 j 76 k 76 l 76 m 76 n	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach
76 h 76 l 76 J 76 k 76 l 76 m 76 n 76 o 76 p	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEPs PEP Close Associates	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited Prohibited Prohibited EDD on risk-based approach EDD on risk-based approach
76 h 76 i 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach
76 h 76 l 76 l 76 k 76 l 76 k 76 n 76 n 76 o 76 p 76 q 76 r	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEF Related Precious metals and stones Red light businesses/Adult entertainment	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited
76 h 76 l 76 j 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach
76 h 76 l 76 l 76 k 76 l 76 k 76 l 76 m 76 n 76 o 76 p 76 q 76 r 76 s 76 t	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPS PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 h 76 l 76 l 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 t	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach
76 h 76 l 76 l 76 k 76 l 76 k 76 n 76 n 76 o 76 p 76 r 76 r 76 s 76 t 76 u 76 v	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPs PEP Close Associates PEF Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited
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76 h 76 l 76 l 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 v 76 v 76 x	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPB PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unsed Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited
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76 h 76 l 76 l 76 k 76 l 76 m 76 n 76 n 76 o 76 p 76 q 76 r 76 s 76 t 76 u 76 v 76 v 76 v 76 x	MSB/MVTS customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Providers PEPB PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unsed Car Dealers Virtual Asset Service Providers Other (specify)	Do not have this category of customer or industry EDD on risk-based approach Prohibited Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited EDD on risk-based approach Prohibited Prohibited Prohibited Prohibited N.A. In accordance with BANCOLDEX's AML policies, customers and counterparties that carry out the activities

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78 a	If V indicate who provides the servery	D. II.
78 a	If Y indicate who provides the approval: Does the Entity have specific procedures for onboarding	Both
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	V
	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different
	State of American State of American	nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking
		services. This trust company applies the general AML/CTF policies established by the Bank.
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
		N.A.
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures	
	and monitoring processes for the identification and	Yes
84	reporting of suspicious activity?	
04	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	4
		Analysis of information that includes red flags in know your customer or update process.
		* 4
84 b	If automated or combination selected, are internal	
	system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	Plus TI - ACRM Monitor Plus
		Fids 11 - ACKIN MOTILO Fids
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report	
	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
86	reporting requirements? Does the Entity have policies, procedures and	
00	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	V
	Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	No branches
90 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different
		nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking
		services. This trust company applies the general AML/CTF policies established by the Bank.
91	If appropriate, provide any additional information/context	
	to the answers in this section.	18 · .
		N.A.
		189
9. PAYMI	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	V
	Transparency Standards?	Yes



	provide the second	
93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes .
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Decree 663/1993 (Colombian Financial Statute) Basic Legal Circular Letter N° 006/2025, issued by the Financial Superintendency of Colombia
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	No branches
96 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
30 a	and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank.
97	If appropriate, provide any additional information/context to the answers in this section.	N.A.
10. SANCT	IONS	
98	Does the Entity have a Sanctions Policy approved by	
a de la constanta de la consta	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against	Yes
102	Sanctions Lists? What is the method used by the Entity for sanctions	Automated
400 -	screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Cluster IT Consulting SAS - Centinela Appliance
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	
	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e 106 f	Lists maintained by other G7 member countries Other (specify)	Used for screening customers and beneficial owners and for filtering transactional data Interpol, IDB, WB, France, and other information provided by colombian authorities
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days

108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	,
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank.
110	If appropriate, provide any additional information/context to the answers in this section.	N.A.
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches



115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking
		services. This trust company applies the general AML/CTF policies established by the Bank.
116	If appropriate, provide any additional information/context to the answers in this section.	N.A.
12 QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
	Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank.
120	If appropriate, provide any additional information/context to the answers in this section.	N.A.
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123 123 a	Does the internal audit function or other independent third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
120 a	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g 123 h	Suspicious Activity Filing Technology	Yes Yes
123 i	Transaction Monitoring	Yes
123 J	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	N.A.
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	No branches
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general AML/CTF policies established by the Bank.
126	If appropriate, provide any additional information/context to the answers in this section.	N.A.
14. FRAU	JD	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes



129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No branches
131 a	The state of the s	Previous answers only apply to BANCOLDEX. BANCOLDEX has only 1 local subsidiary, which has different nature and businesses (trust company) and this subsidiary does not offer or receive correspondent banking services. This trust company applies the general fraud policies established by the Bank.
132	If appropriate, provide any additional information/context to the answers in this section.	N.A.

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money
Laundering, Chief Compilance Officer, Global Head of Financial Crimes Compilance OR equivalent)

Banco de Comercio Exterior de Colombia (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, Luís Alejandro Lozano Gutiérrez (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

Jan Carlos Sarmiento Espinel (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my onest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

_august 15, 2025 (Signature & Date)

august 15, 2025 (Signature & Date)