CERTIFICATION ON ADMINISTRATION RISK SYSTEM TO MONEY LAUNDRY AND TERRORISM FINANCING – SARLAFT – (for its abbreviation in Spanish)

Banco de Occidente is a banking institution duly incorporated under the laws of the Republic of Colombia, supervised by the Financial Superintendence of Colombia and its business head office are in Cali (Colombia), in Carrera 4 No. 7-61, Telephone (+57) 6024850707.

For the purposes to prevent and comply with the legal frame, the Bank has adopted and implemented the "Administration Risk System to Money Laundry, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction – SARLAFT" including the compliance with the provisions in Organic Statute of Colombian Financial System (Decree 663/1993), and the additional provisions, and the especial directives issued by Financial Superintendence of Colombia, as well as the recommendations and good International practices related to this topic, mainly GAFI and GAFILAT regulations.

The policies, controls and procedures implemented in line with the risk management concept, are the directives related to the due diligence to prevent the use of Bank by criminal organizations. Such actions include, inter alia, the knowledge of customer and customer's activities, the definition of segments of markets, customer and operations monitoring, training of personnel and cooperation with competent authorities.

Our procedures are accomplished under the ethical and control standards, always putting the sound banking practices before the commercial and profit goals. The principles, values and conduct standards applied to prevention and control mechanisms and instruments are addressed in SARLAFT Manual and in the Code of Ethics & Conduct, approved by Bank´s Board of Directors, to be fully accomplished by all directive officers and employees of the institution.

Our policies, standards, procedures and controls will be accomplished as well by Bank´s domestic and overseas affiliates and subsidiaries, adapted to the regulations prevailing in the countries where affiliates and subsidiaries are operating.

The Bank has implemented a Customer Identification Program (CIP) applicable to both in-person and non-face-to-face onboarding processes, designed to ensure compliance with the U.S. PATRIOT Act and other applicable foreign laws and regulations related to the prevention of money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction. This program includes:

- Policies, procedures, and a system of internal controls to assure ongoing compliance with applicable AML and economic sanctions laws and regulations.
- The designation of AML Compliance Officer, responsible for coordinating and monitoring day-to-day AML Program compliance.
- Procedures for independent testing for compliance with the AML Program and applicable laws.
- Anti-money laundering training for appropriate personnel.
- Record keeping and reporting requirements, including those for cash transactions.
- Identification of higher risk customers and the performance of enhanced due diligence.
- Appropriate risk-based measures for monitoring transaction activity of customer's accounts.

The Bank is also having policies and procedures designed to comply with the prohibitions and restrictions mandated by U.S. Treasury Department's Office of Foreign Assets Control ("OFAC") and all other sanctions laws and regulations applicable in the jurisdictions in which the Bank operates.

The Bank is a publicly traded company that is regulated by the Financial Superintendence of Colombia and the shares are registered on the Bolsa de Valores de Colombia.

DOCUMENTATION

All stages and components of the SARLAFT implemented by the Bank are supported by documented records that ensure the integrity, timeliness, reliability, and availability of the information contained therein. The Bank has established documented security processes to ensure that SARLAFT-related information is accessible only to authorized personnel.

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The Bank has also implemented a document retention process for the management, custody, and preservation of information for a period of five (5) years, in compliance with the provisions set forth in the Basic Legal Circular issued by the Financial Superintendence of Colombia, as well as Article 96 of the Colombian Financial System Organic Statute.

Information related to transactions and activities conducted by clients is retained for the periods established by law and is made available to the competent authorities for the purposes of their investigations.

The Bank's SARLAFT procedures manual sets out in detail the information required under Part I, Title IV, Chapter IV of the Basic Legal Circular.

CUSTOMER DUE DILIGENCE

The know-your-customer policy means that all customers shall be properly identified in order to clearly determine their financial profile. Some customers, due to risk profile, such as Politically Exposed Persons (PEP) or customers whose source of income is related to markets or activities considered as controlled, enhanced due diligence is required and the establishment of business relationships is subject to the approval of Senior Management. Client information, regardless of whether onboarding is conducted through in-person or non-face-to-face channels, is verified, and due diligence procedures are performed to ensure that such information remains accurate and up to date.

This approach is complemented by a thorough understanding of the market segments and client types served by the Bank, enabling benchmarking and comparative analysis when assessing new clients.

Information related to transactions and activities conducted by clients is retained for the periods established by law and is made available to the competent authorities for the purposes of their investigations.

MONITORING SYSTEM

The Bank has in place a state-of-art technological platform based on alert and automatic scoring system properly staffed by expert and skilled human resource, allowing for the institution to verify online any customers' transactions, and performing an automatic match with the products, channels, and jurisdictions, in order to identify and track unusual operations, based on alert and warning signals.

In the same way, this system offers an integral risk analysis of the Bank, taking into consideration the several different risk factors, associated risk and qualitative/quantitative variables.

Whenever the unusual transactions or operations are detected and not satisfactorily explained by customers, such operations will be considered as suspect ones, and as such, reported to competent authorities (*Unidad de Informacion y Análisis Financiero – UIAF*), as provided in the regulations prevailing.

For high-risk profile customers, a meticulous monitoring scheme has been established.

PERSONNEL TRAINING

Bank´s top management is aware of the training importance and recognizes that employees are essential factors for risk prevention and control, and for such reason, annually they are properly trained on prevention and control of laundering asset/financing of terrorism risk management.

Additionally, those employees directly in contact with customers, as well as those managing higher-risk customer's relationships are specifically trained on these matters.

COMPLIANCE OFFICER

To develop the duties set forth in legal provisions, the Board of Director has appointed a Compliance Officer and his deputies, who takes their office before the Financial Superintendence of Colombia.

The Compliance Officer is highly qualified and empowered to make decisions, is supported by a human and technical team allowing to cover the different management areas and is effectively supported by Bank directors.

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AUDIT AND CONTROL

As already mentioned, the Bank is under the supervision and control of Financial Superintendence of Colombia that perform periodical visits to the Bank in order to verify the compliance with SARLAFT provisions.

As a result of such evaluations, corrective actions are implemented allowing continued enhancement in this matter, allowing for the Bank to mitigate risks associated to laundering asset and financing of terrorism.

On the other hand, the revision of compliance with control mechanisms designed and implemented in SARLAFT, have been included in the internal and external audit process as a specific program based on audit procedures.

For more information about businesses and the products and services offered, please visit our website at www.bancodeoccidente.com.co.

Cordially,

JORGE HUMBERTO GALEANO LINEROS
Compliance Officer
Date: June 18th, 2026.