

**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 located in Cali (Colombia), in Carrera 4 No. 7-61, Telephone (57+2) 4850707.

For the purposes to prevent and comply with the legal frame, the Bank has adopted and implemented the “Administration Risk System to Money Laundry and Terrorism Financing – 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 GAFISUD 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 incorporated a Customer Identification Program, designed to comply with the USA PATRIOT Act and other foreign applicable laws and regulations, relating to the prevention of money laundering and terrorist financing. The AML Program provides for:

- 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.

KNOW THE CUSTOMER

The policy know-the-customer means that all customers shall be properly identified in order to clearly determine their financial profile. Some customers, due to risk profile, will be subject to more demanding and detailed processes before being admitted to the Bank. Customer's information is verified and information updating procedures is properly made.

This information is complemented with the knowledge of market segments and the customers served, thus allowing comparisons with the new customers.

Information about operations and transactions made by customers is kept according to terms set forth in law, and it is available to competent authorities for the investigation underway.

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 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 deputy, 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.

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,



RICARDO ZULUAGA VELEZ

Compliance Officer

Date: Jan 10th 2020