

AML FIDUCIARIA BOGOTA S.A.

FIDUCIARIA BOGOTÁ S.A.

Calle 67 No. 7 - 37 Piso 3
Bogotá (Colombia)

FIDUCIARIA BOGOTA S.A. has established and continues to maintain a Global Anti-Money Laundering Policy designed to ensure, that at a minimum, FIDUCIARIA BOGOTA and all of its businesses are in compliance with all applicable laws, rules and regulations related to anti-money laundering and anti-terrorist financing initiatives. Among other relevant laws, the Global Anti-Money Laundering Policy adheres to pertinent provisions of the SARLAFT which prohibits accounts with foreign shell banks; requires financial institutions to establish due diligence policies, procedures, and controls reasonably designed to detect and report money laundering through correspondent accounts; and mandates financial institutions to conduct enhanced scrutiny of certain accounts maintained by or on behalf of senior foreign political figures. Furthermore, FIDUCIARIA BOGOTA is subject to regulatory oversight by SUPERINTENDENCIA FINANCIERA DE COLOMBIA.

More specifically, FIDUCIARIA BOGOTA.'s Global Anti-Money Laundering Policy requires that each FIDUCIARIA BOGOTA business, as appropriate, maintain a compliance program that provides for:

- Procedures to implement the FIDUCIARIA BOGOTA Know Your Customer (“KYC”) policy/program and Customer Identification Program and a system of internal controls to ensure that appropriate due diligence, and when necessary, enhanced due diligence, including obtaining and maintaining appropriate documentation, is conducted at account opening and updated, as necessary, through the course of the customer relationship;
- The designation of an Anti-Money Laundering Compliance Officer, or other appropriate personnel, responsible for coordinating and monitoring day-to-day compliance with the Global Anti-Money Laundering Policy and applicable laws, rules and regulations;
- Recordkeeping and reporting practices in accordance with the Global Anti-Money Laundering Policy and applicable laws, rules and regulations;
- Appropriate methods of monitoring transactions and account relationships to identify potential suspicious activity;
- Reporting of suspicious activity to governmental authorities in accordance with the Global Anti-Money Laundering Policy and applicable laws, rules and regulations;
- Training of appropriate personnel with regard to anti-money laundering and anti-terrorist financing issues and their responsibilities for compliance;



- Independent testing to ensure that the programs required by the Global Anti- Money Laundering Policy and applicable laws, rules and regulations have been implemented and continue to be appropriately maintained.

FIDUCIARIA BOGOTA, and each of its businesses, have undertaken due diligence to know its customers. There is no reason to believe that any of [FIDUCIARIA BOGOTA's customers are prohibited shell banks, an individual or entity that is named on the list of Specially Designated Nationals and Blocked Persons issued by the Department of the Treasury's Office of Foreign Assets Control ("OFAC"), or an entity that is organized or chartered in a country or territory subject to OFAC's country-wide or territory-wide sanctions programs, to the extent prohibited by applicable sanctions, or named on any available government lists of known or suspected terrorists or terrorist organizations issued by the government of any jurisdiction in which a FIDUCIARIA BOGOTA business conducts business, as applicable, in violation of applicable law.

Sincerely,



Diego Alejandro Rodríguez
Compliance Officer

