CERTIFICATION OF COMPLIANCE
Anti-Bribery and Anti-Corruption (ABAC) Risk Management System

BANCO POPULAR S.A., an entity duly incorporated in the Republic of Colombia, with its principal office located at Calle 17 No. 7-43 in Bogotá D.C., and subject to the permanent inspection and supervision of the Financial Superintendence of Colombia, hereby certifies that it has a fully implemented and operational Anti-Bribery and Anti-Corruption Risk Management System (ABAC), which is subject to continuous improvement.

The Bank reaffirms its commitment to the highest standards of integrity, transparency, and corporate ethics. Since 2015, the Bank has adopted a system designed to reinforce zero tolerance toward domestic and transnational bribery, as well as any form of corruption. The system operates with active support and leadership from the Bank's most senior governance bodies.

The system includes policies, procedures, and controls aligned with national and international standards, including the FCPA, the Colombian Criminal Code, Law 1474 of 2011, ISO 37001, ISO 37301, and NTC 6671:2023. The ISO and NTC certifications were issued by Certification Management & Development S.A.S.

The Bank requires all its officers and employees to strictly comply with the Anti-Bribery and Anti-Corruption Policy and the Code of Ethics and Conduct, and to report, in good faith and without fear of retaliation, any suspicious activity or indication of improper conduct.

Based on the foregoing, it is hereby certified that Banco Popular S.A. maintains a robust, effective, and duly certified system for the prevention, detection, and management of bribery and corruption risk, thereby supporting the integrity and transparency of its operations.

Helber Alonso Melo Hernández
ABAC Officer
Vice President of Risk Management
Valid for 2026