CERTIFICATION OF COMPLIANCE
Anti-Money Laundering and Counter-Terrorist Financing Risk Management System

BANCO POPULAR S.A., hereinafter the Bank, is an entity duly incorporated in Colombia and supervised by the Financial Superintendence of Colombia. In strict compliance with the regulatory framework issued by the Financial Superintendence of Colombia and the provisions in force for the prevention of money laundering and terrorist financing, the Bank maintains its Anti-Money Laundering and Counter-Terrorist Financing Risk Management System (SARLAFT, for its Spanish acronym) duly implemented, operational, and subject to continuous improvement.

The system is grounded in a comprehensive risk management methodology, supported by specialized technological tools and controls differentiated by risk factor, defined based on the analysis of the internal and external context. These controls are designed to prevent the materialization of risks and mitigate their impact through effective treatment measures.

The Bank carries out activities to ensure comprehensive and up-to-date knowledge of its clients, users, and markets, and promotes an institutional culture of compliance through ongoing training programs. In addition, the Bank conducts timely detection, analysis, and reporting of suspicious transactions to the UIAF, and periodically updates its policies, procedures, segmentation models, and monitoring tools. The Bank also maintains a SARLAFT training program for its employees and executives and promotes compliance with the Code of Ethics and Conduct, which guides the conduct of all its employees.

The Bank has a Compliance Officer and a Deputy Compliance Officer, both formally registered with the Financial Superintendence of Colombia, who have the independence, resources, and capabilities necessary for the proper management of the system. The Risk Committees continuously monitor the evolution of SARLAFT, and the Board of Directors reviews, on a quarterly basis, the reports submitted by the Compliance Officer, in accordance with regulatory provisions.

Based on the proper implementation, operation, and oversight of the system, it is hereby certified that the Bank complies with applicable regulatory and international standards regarding AML/CFT risk management and holds ISO 37001:2016, ISO 37301:2021, and NTC 6671:2023 certifications, issued by Certification Management & Development S.A.S., reaffirming its commitment to transparency, integrity, and the soundness of its operations.

Xiomara Saavedra Yepes
Compliance Officer
Valid for 2026