

Bogotá, January 25, 2021.

TO WHOM IT MAY CONCERN

CERTIFICATION ON THE COMPLIANCE ON THE SARLAFT PROGRAM

Santander CACEIS, Trust Company, duly incorporated under the laws of the Republic of Colombia, and supervised by the Financial Superintendence of Colombia, and with its main business address in the city of Bogotá D.C., certifies the following:

1. Compliance with Regulations on the Prevention of Money Laundering (ML)/Terrorism Financing (TF) Risks.

Santander CACEIS has developed and implemented the Anti-Money Laundering and Counter Terrorism Financing Risk Management System ("SARLAFT" in Spanish), thus complying with the provisions of the applicable rules, such as the Organic Statute of the Colombian Financial System, in Part I, Title IV, Chapter IV, of the Legal Basic Circular Letter, the good practices of the Board of Directors and corporate areas of Santander Group, and of the Financial Action Task Force (FATF).

The policies, controls and procedures implemented in the SARLAFT referred to above, are defined to prevent the Company to be used, directly or indirectly, in the undertaking of ML/TF operations. The SARLAFT of Santander CACEIS, includes, among other aspects, knowledge of customer and its operations, definition of market segments, monitoring of transactions, training of personnel and cooperation with competent authorities.

Santander CACEIS and its officers should put ethical principles before the achievement of business goals. The rules of conduct on the implementation of the SARLAFT are referred to in the Code of Conduct of Santander Group, its Annex applicable to the operation in Colombia, and SARLAFT Manual of Santander CACEIS, which are binding on all its officers.

2. Knowledge of Customer.

Santander CACEIS has specific rules and procedures for customer identification and knowledge. Business relations acceptance policies are very strict, and rejection and prior authorization criteria are applied for certain types of clients and businesses.

3. Monitoring System

Santander CACEIS has a technological tool that allows tracking to all customers transactions, by performing a validation of their products, used channels and jurisdictions, with the purpose of identifying unusual operations.

If in the execution of the monitoring, unusual transactions or operations are detected; which, according to a subsequent analysis are determined as suspicious, these will be reported to the Financial Information and Analysis Unit (UIAF), in accordance with current regulations and the prior consensus of the Risk Committee of the Company.

4. Training of Personnel

There are training programs for all officers of S3, which will be taught at least once a year.

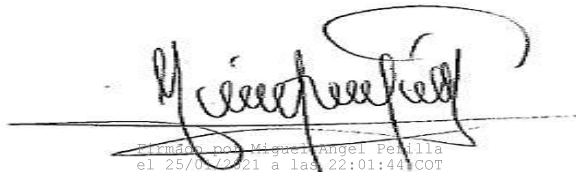
5. Compliance Officer

Santander CACEIS has a Compliance Officer for the development of the functions established by law.

6. Audit and Control

Internal Audit and Statutory Audit services will carry out controls and independent tests to verify the proper functioning of the SARLAFT of Santander CACEIS.

Sincerely,



MIGUEL ANGEL PERILLA TOLOSA
Compliance Officer