

BANCO DE BOGOTÁ

CONTROL ARCHITECTURE

1. Scope and objective.

Banco de Bogotá, in accordance with corporate standards and best practices, has an internal control system (hereinafter ICS), aligned with the standards defined by the Financial Superintendence of Colombia through the applicable regulation, as well as with international regulatory standards and best internal control practices (COSO, PCAOB, The Institute of Internal Auditors OCDE, Basel Committee on Banking Supervision, Financial Stability Board, among others).

The Bank's ICS is supported by the model of the three lines of defense that, from its organizational structure and process management, provides reasonable confidence for the achievement of objectives, promoting sound governance and adequate risk management. This model covers all the personnel of the entity and its subsidiaries, including directors and managers.

2. Internal Control System.

The Internal Control System (ICS) constitutes for Banco de Bogotá a fundamental tool for the management and good governance of the company, defining a structure that contains¹:



The aforementioned is based on 5 pillars that are interrelated in a synchronized manner, guaranteeing the application of an adequate ICS within the organization, namely²:

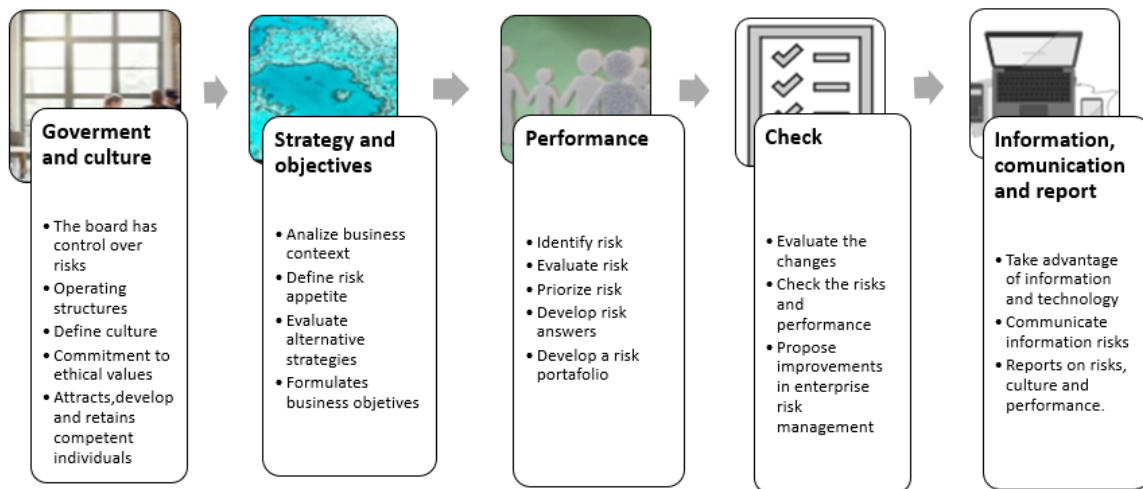
- Government and culture.
- Strategy and goal setting.
- Performance.
- Review and monitoring.
- Information, communication and reporting.

Internal control contains a set of policies, principles, rules, procedures and verification and evaluation mechanisms established by the Board of Directors and Senior Management, with the assistance of all the employees of the organization who provide, from each of their roles, reasonable assurance through the appropriate management of financial and non-financial risks associated to the business³:

¹ Representation of the COSO ERM model.

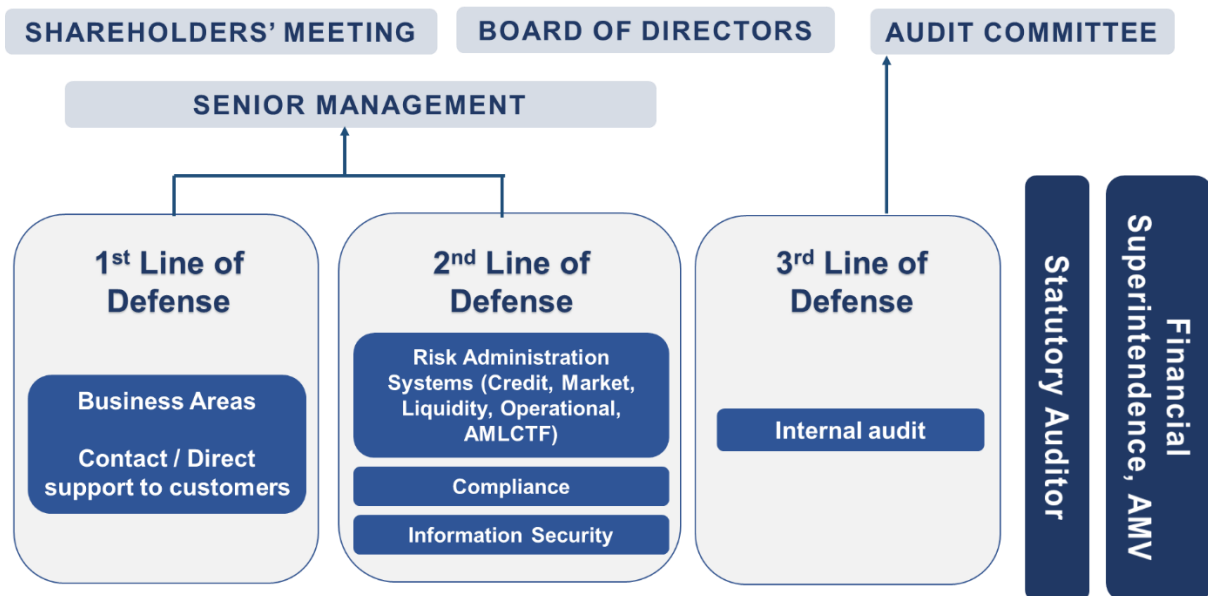
² COSO Model components.

³ Components of the COSO model - Internal control risks.



3. Internal Control Architecture.

For the proper management of its ICS, Banco de Bogotá has adopted the Three Lines of Defense model, through which the entity's Corporate Governance and Senior Management permanently monitor due process, risk and control management.



Banco de Bogotá's Corporate Governance structure can be found in Title II of the Code of Good Governance: [corporate-governance-code-jul-2022.pdf \(bancodebogota.com\)](https://www.bancodebogota.com/corporate-governance-code-jul-2022.pdf)

As part of our Corporate Governance, Banco de Bogotá has a control architecture that supports the Internal Control System (ICS), responsible for managing the different internal or external risk scenarios which are inherent to the operation of the

organization, providing methodologies, procedures and tools that support the achievement of the Bank's strategic objectives.

The following are the most representative components of the ICS:

General Shareholders' Meeting: the highest governance body is the General Shareholders Meeting, which is made up of the shareholders listed in the "Shareholders Registry", or of their representatives or proxies, assembled pursuant to the provisions of the Law, the Bylaws and the Rules of Procedure for the General Shareholders' Meeting. The General Shareholders' Meeting is the main body to exercise control over the Banks' management and, consequently, over the actions of the Board of Directors.

Board of Directors: the Board of Directors is the company's highest administrative body and is responsible to guide the Bank's strategic policy, and to monitor and assess the tasks performed by Senior Management, determining the government and control architecture as well as the main policies for risk management and organizational development, overseeing compliance of the same by Senior Management and the overall organization. The Board of Directors acts as a liaison between Senior Management and the General Shareholders' Meeting as required. The Board of Directors is composed of five (5) principal members and their five (5) personal alternates, elected by the General Shareholders Meeting for a one (1) year term, and may be re-elected indefinitely or freely removed before the expiration of the term.

The Integrated Risk Management Committee of the Board of Directors: this committee is comprised of three (3) members from the Board of Directors, elected by the Board for a one-year (1) term, who may appoint independent parties to advise them and may summon Bank employees as often as needed to provide the Committee with information deemed appropriate on matters of its competence. Its primary function is to assist the Board of Directors in complying with its overseeing responsibilities related to the Bank's risk management.

Audit Committee: the Audit Committee is elected by the Board of Directors and is comprised of 3 members from the Board of Directors, elected for a one-year (1) term. They may be indefinitely re-elected. Its primary function is to assist and advise the Board on the evaluation of the Bank's Control Architecture, as well as on its continuous improvement. Depending on the issues to be addressed, Senior Management and other employees will attend the meeting as deemed appropriate by the Committee. Furthermore, the Statutory Auditor and other Board members are invited to the Committee meetings.

The Committee may appoint independent parties to advise it and may summon Bank employees as often as needed with the purpose of providing the Committee with information on matters of its competence.

The Audit Committee's primary functions include those related to the presentation to the Board of Directors of the structure, procedures and methodology for the Internal Control System, as well as presentation of the proposals related to responsibilities,

competencies and limits assigned to different positions and areas of the Bank in relation to the Internal Control System's management.

Internal Audit: the Internal Audit is the entity, under the direction of the Board's Audit Committee, in charge of carrying out an independent evaluation of the Internal Control's management.

The Internal Audit function performs a systematic and permanent assessment to identify the main risks, assess whether existing controls have been complied with and if they are sufficient and adequate, producing recommendations tending to strengthen the Internal Control System.

Relevant findings from the Internal Audit are reported to the President and the Board's Audit Committee, as the case may be, and similarly, its main findings are attested in the Board's Management Report on the Internal Control System presented to the General Shareholders Meeting at the end of each fiscal period.

To guarantee its independence, the Internal Auditor reports directly to the Audit Committee. The Internal Auditor's appointment and removal shall be the responsibility of the Board of Directors, who will select from candidates presented by Management.

Credit Committee: the Credit Committee is comprised of five (5) members from the Board of Directors, who may appoint independent parties to advise them and may summon Bank employees as often as needed to provide the Committee with information.

The Credit Committee meets usually on a weekly basis, to analyze and decide on lending operations to customers, within the limits determined by the Board of Directors, and recommends lending operations which, due to the amount, must be approved by the Board.

Senior Management: In addition to the Board of Directors and the President, the C level executives are part of the Bank's administrative organ, as personnel in charge of the ordinary course of business and as responsible for conceiving, executing and monitoring the objectives and strategies.

Compliance Function: the Compliance Function is a transversal process in Banco de Bogotá, whose main activity is to identify, evaluate, advise and report on compliance risks within the organization, in order to prevent and mitigate the imposition of fines or legal or regulatory sanctions, financial losses or reputational losses as a result of non-compliance with laws, external and internal regulations, rules, standards (Code of Ethics, Conduct and Transparency); the compliance function was approved at the meeting held on July 15th / 2014, as recorded in Minute No. 1.220.

The methodology used for the establishment of this function uses the recommendations given by the Basel Committee on Banking Supervision in 2005 and 2015. It is complemented by the evaluation criteria of the Compliance Function

issued by the Financial Superintendence of Colombia within the Comprehensive Supervisory Framework (MIS), as well as international standards.

In the approved and implemented policy, the compliance function is responsible to promote compliance with internal and external regulation adopted by the Bank; to advise other areas on correction of detected weaknesses regarding risks as well as on regulatory compliance, on self-regulation, in order to minimize the Bank's risk exposure from an operational, legal reputational and contagion perspective.

For its correct development, applicable regulation is shared with the process owners, and advice and support is provided to understand said regulation and implications in case of non-compliance. This function is undertaken in coordination with the Legal Vice-Presidency, the Credit Vice-Presidency, the Financial Control and Regulation Vice-Presidency, and those areas where this function is critical.

Compliance is part of Banco de Bogotá's culture and a responsibility of all employees, direct and indirect.

Additionally, there are external entities that are part of the control architecture such as the Statutory Auditor and other surveillance, regulation and control entities such as the Financial Superintendence of Colombia, within its natural competency, the Securities Market Self-Regulator and other supervisory entities in the countries where the Bank operates.

Statutory Auditor: the Bank has a Statutory Auditor, who in turn has an assigned alternate, both appointed by the General Shareholders Meeting for a one-year (1) term. The Statutory Auditor may be re-elected or freely removed by the General Shareholders Meeting. In accordance with Article 33 of the Bank's Bylaws, the Statutory Auditor shall be elected from an auditing firm with recognized track record and experience.

As a guarantee of transparency in the election of the Statutory Auditor at the General Shareholders Meeting, shareholders may submit alternatives for consideration in the terms stipulated in the Bank's Bylaws. In no event it shall propose or elect as Statutory Auditor or his/her alternate any candidate liable of any type of ineligibility, incompatibility, sanctions or suspensions constituting a legal impediment to exercise duties as Statutory Auditor of the Bank and, if applicable, when the Statutory Auditing firm is subject to the same type of ineligibilities, incompatibilities, sanctions or suspensions constituting legal impediment for offering its services.

In addition to the ineligibilities and incompatibilities set forth in the Law and in the Bylaws, the Statutory Auditor may not be a company shareholder, nor have a marital bond or kinship within the fourth degree of consanguinity or first degree of affinity, nor can it be a co-partner of the Legal Representatives or of any member of the Board of Directors, of the Treasurer, the Accountant nor the Internal Auditor. The Statutory Auditor's duties are incompatible with the performance of any other job or employment within the Company or its subordinates.

The Statutory Auditor, the firm he/she represents, the companies within its group, as well as companies in which there is a significant coincidence of partners and/or

administrators with administrators of the Auditing Firm shall not be hired by the Bank or its subordinated companies to provide services other than financial auditing itself and other functions recognized in current regulation.

Financial Superintendence of Colombia: the Political Constitution defines that the financial and stock market activity and all that related to the management, use and investment of resources collected from the public may be exercised with prior authorization from the State. Therefore, in accordance with current regulations, the Financial Superintendence of Colombia, as a technical body attached to the Ministry of Finance and Public Credit, is responsible for inspecting, monitoring, and controlling those who carry out financial activity.

The Financial Superintendence also exercises control over issuers of securities. In this sense, the Bank is subject to the rules that regulate the public securities market and has the obligation to keep the Financial Superintendence and the Colombian Stock Exchange permanently updated, sending year-end information, quarterly information and relevant information, in the terms established in the applicable regulation.

Securities Market Self-regulator (AMV): the legal nature of this entity is that of a private non-profit corporation, of national character, which is governed by the current regulation, by its bylaws and regulations and by the principles that apply to self-regulatory bodies. The Financial Superintendence authorized the AMV to function as a self-regulator of the securities market in Colombia, by issuing Resolution No. 1171 of July 7, 2006.

Therefore, the AMV as a self-regulatory organ, fulfils functions of regulation, supervision and discipline of the activity of securities intermediation, adopting principles and guidelines of conduct to ensure the balance between the participation of securities intermediaries and the independence to act objectively in the interests of intermediaries, investors, and market development in general. As an intermediary in the securities market, the Bank is subject to the regulation issued by the AMV.

Foreign Authorities: Bank's operations in other jurisdictions so, it is subject to the supervision of the authorities of each country.