

Medellín, June 19, 2019

**COMPREHENSIVE SYSTEM FOR THE PREVENTION AND CONTROL OF
ASSET LAUNDERING AND THE FINANCING OF TERRORISM - (SIPLA in
Spanish)**

**GRUPO DE INVERSIONES SURAMERICANA S.A.
NIT 811.012.271-3**

We hereby certify that Grupo de Inversiones Suramericana S.A., hereinafter the "Company", complies with the provisions and mechanisms issued by the Colombian Superintendency of Finance (Superintendencia Financiera de Colombia), for the prevention and control of asset laundering and the financing of terrorism.

The Company has adopted a Comprehensive System for the Prevention and Control of Asset Laundering and the Financing of Terrorism -SIPLA (in Spanish) which embraces all that stipulated in Part III, Heading I, Chapter VII of the Basic Legal Circular Letter issued by the Colombian Superintendency of Finance as well as in other External Circulars issued by said Superintendency. In the light of this, we have put into place policies, controls and procedures designed to prevent that, in carrying out our operations, we are used as an instrument for concealing, handling, investing or using any form of money or other goods sourced from illicit activities. or to give the appearance of legality to said activities or to the transactions and funds relating to these.

We have also put into place rules of conduct that must be adhered to, which have been approved by the Company's Board of Directors.

It is the obligation and responsibility of all our officers and especially those who are directly involved with our investors and their transactions, to strictly comply with the standards set forth in our AML/CFT (SIPLA) Manual and Code of Conduct.

With regard to the information we provide our investors, due diligence is carried out to keep this strictly up to date. This information is maintained according to the terms and conditions provided by law and is made available to the authorities for their consultation and investigation purposes, together with the documentation relating to suspicious transactions.

With regard to monitoring and controlling compliance with our Comprehensive System for the Prevention and Control of Asset Laundering and the Financing of

Terrorism (SIPLA), corrective measures are applied whenever necessary that ensure the continuous improvement of said System and the corresponding reports are submitted to the Board of Directors with the required frequency, which include the results of the different actions carried out, so as to be able to comply with the rules and regulations of said system.

Finally, and bearing in mind that the Company's shares circulate in a dematerialized or book-entry form and that the Shareholders' ledger is managed by the Centralized Securities Depository of Colombia - DECEVAL in Spanish, which comes under the oversight of the Colombian Superintendency of Finance, we also wish to note that DECEVAL provides us with a monthly certificate concerning the following matters:

- That it has complied with the rules and regulation relating to the Prevention and Control of Asset Laundering and the Financing of Terrorism as provided in the Organic Statute of the Colombian Financial System (Decree 663 of 1993), the Colombian Penal Code and all other domestic rules and regulations relating to such, as well as all those international recommendations issued by the FATF, GAFISUD, OAS, UN, CICAD, OFAC, among others.
- That it has put into place approved policies which receive the support and sponsorship of its Board of Directors, for preventing and controlling asset laundering and the financing of terrorism.
- That as an infrastructure provider, it has established strict procedures in this regard that must be complied with by its clients.
- That during the period covered by the certification thus issued, no reports of suspicious or unusual transactions involving the Company's shareholders were detected.

Yours sincerely,

JUAN LUIS MÚNERA GÓMEZ
Legal Representative
Grupo de Inversiones Suramericana S.A.