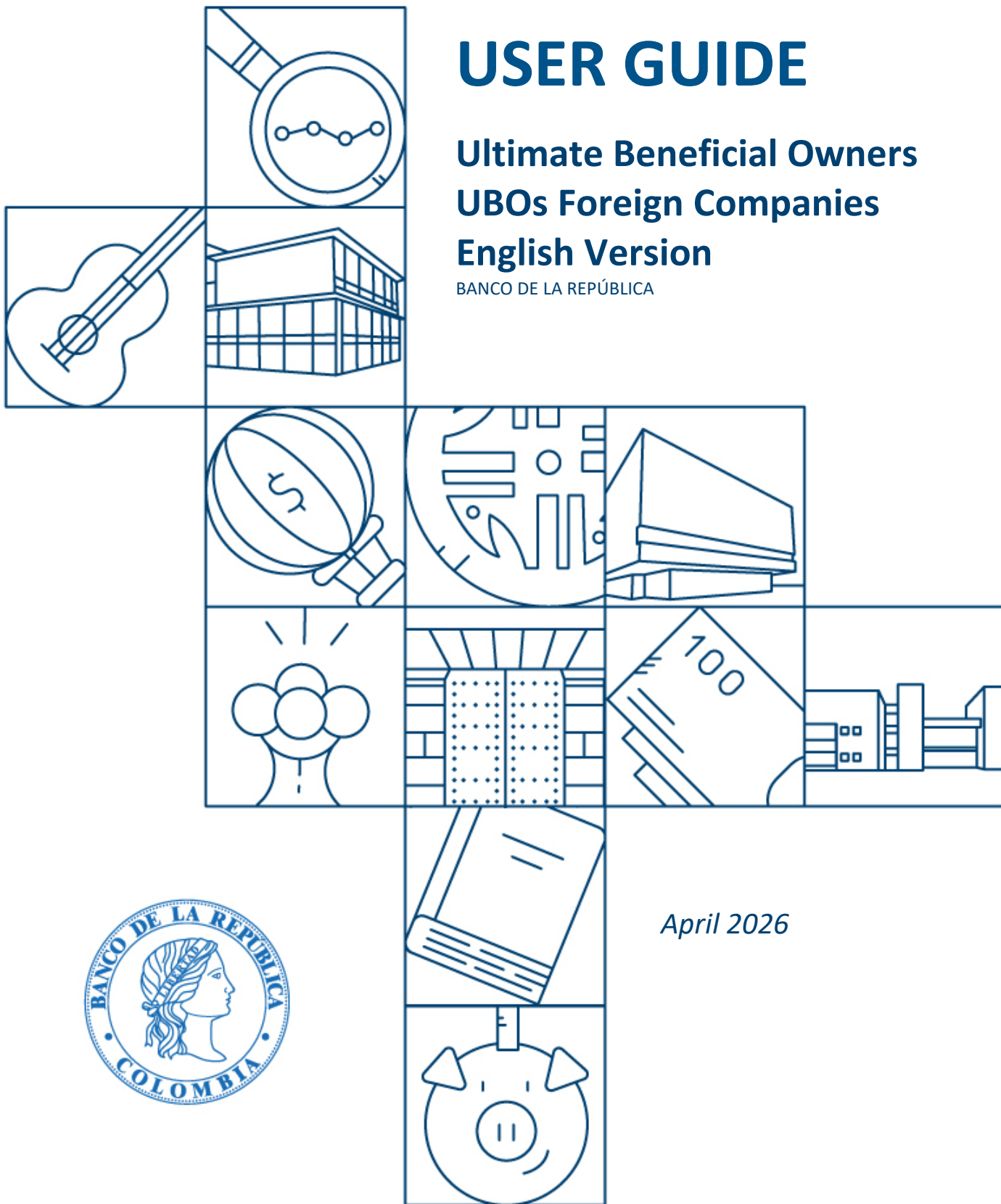

USER GUIDE

Ultimate Beneficial Owners UBOs Foreign Companies English Version

BANCO DE LA REPÚBLICA



April 2026

Table of Contents

1	SECURE REGISTRATION - AUTHENTICATION TO LOG ON TO THE APPLICATION	4
1.1	Web browser logon link:	4
1.2	Secure Login registration	4
1.2.1	Technical Support	5
1.2.1.1	Instructions for reporting technological failures different to phone contact	5
1.2.2	Description of the registration screen	5
1.2.2.1	Authentication with e-mail	6
1.2.2.2	Verification e-mail	7
1.2.2.3	Code verification	8
1.2.2.4	E-mail verification screen	8
1.2.2.5	Account creation - ID validation	9
1.2.2.6	External user account creation form	9
1.2.2.7	Verification and registration	11
1.2.3	Entry of credentials as a registered user	11
1.2.3.1	Verification e-mail	12
1.2.3.2	Code verification	12
1.2.3.3	E-mail verification screen	13
1.2.4	Change of user for registration or modification of information	13
2	ACCOUNT REGISTRATION - BUSINESS INFORMATION	15
2.1	Validity of the registration	15
2.2	Instructions for account registration	15
3	MANDATORY QUESTIONS ABOUT ULTIMATE BENEFICIAL OWNER (UBO)	17
3.1	Question about internal guidelines or regulations for foreign legal entities	17
3.2	Question about participation in stock exchange	19
4	REGISTRATION OF LEGAL REPRESENTATIVE OR PERSON WITH HIGHEST AUTHORITY	20
5	REGISTER OF ULTIMATE BENEFICIAL OWNERS WITH CORPORATE PARTICIPATION EQUAL TO OR GREATER THAN 5%. - ULTIMATE BENEFICIAL OWNERS TREE	21
5.1	Generalities	21
5.1.1	Steps to build the entire tree	23
5.1.2	System functions	23
5.1.3	Visual indicators	23
5.2	Add ultimate beneficial owners – ultimate beneficial owners’ tree	24

5.2.1	Select type of person to report	24
5.2.2	Report of a natural person as an ultimate beneficial owner	25
5.2.3	Registration of legal entity	26
5.3	Visualization of the finished tree	30
5.4	Completion of the ultimate beneficial owner registration	30
6	UPDATING THE INFORMATION REGISTERED	31
6.1	Review and update of the information	31

INTRODUCTION

Supervised entities shall be responsible for designing, implementing, and maintaining an effective AML/CFT Risk Management System (**SARLAFT**), in strict and demonstrable compliance with the minimum criteria and parameters established by the Financial Superintendency of Colombia (**SFC**). Such a system must comply with and operationalize internationally recognized standards on Anti-Money Laundering and Counter-Terrorist Financing, particularly the recommendations issued by the Financial Action Task Force (**FATF**) and the Latin American Financial Action Task Force (**GAFILAT**). Supervised entities are legally obliged to establish and apply risk-based Customer Due Diligence (**CDD**) and Enhanced Due Diligence (**EDD**) measures, which shall include mandatory identification, verification, and documentation of the Ultimate Beneficial Owner (**UBO**) of legal arrangements lacking legal personality, as well as of legal entities and any shareholders or partners holding—directly or indirectly—an amount **equal to or greater than 5%** of the share capital, in accordance with applicable regulatory requirements.

PURPOSE OF THE ULTIMATE BENEFICIAL OWNERS SYSTEM

Its purpose is to facilitate the registration, consultation, and management of information regarding Ultimate Beneficial Owners (**UBOs**) of Colombian and **foreign companies**, complying with the applicable legal and regulatory requirements.

SCOPE OF THE GUIDE

This guide is designed to provide external users of *Banco de la República* with instructions on the use of the **Ultimate Beneficial Owners System**, which enables the following actions:

- To register Ultimate Beneficial Owner (UBO) information.
- To consult previously recorded data.
- To manage the information in accordance with current regulatory requirements.

GENERAL DESCRIPTION

The Ultimate Beneficial Owners System is a digital platform developed for *Banco de la República* that allows Colombian and foreign companies to register, update, and manage the information of their Ultimate Beneficial Owners, complying with the legal and regulatory requirements in force.

⚠ Important: The third party shall ensure that information related to its ultimate beneficial owners will be kept up to date **throughout the term of the agreement with the Bank**. Any changes to **legal representatives** or **ultimate beneficial owners** must be reported **immediately**.

1 SECURE REGISTRATION - AUTHENTICATION TO LOG ON TO THE APPLICATION

The Ultimate Beneficial Owner (UBO) system is a digital platform developed for *Banco de la República* that allows Colombian and foreign companies to register, update and manage the information of their ultimate beneficial owners, complying with the applicable legal and regulatory requirements. To access the External Ultimate Beneficial Owner (UBO) system, follow these steps:

1.1 Web browser logon link:

Click on the following navigation web link:

<https://fiba.banrep.gov.co/beneficiarios-finales-externos/>

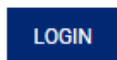
1.2 Secure Login registration

By accessing the application link, the following main screen of *Banco de la República's* **Ultimate Beneficial Owners (UBO) system** is displayed.

Illustration 1: Start screen



Once on the home screen, click on the blue "**LOGIN**" button located at the upper-right hand section of the page.



By selecting this button, the system redirects you to a new page where you can:

- **Log on** as an external user.
- **Access the services** available in the Ultimate Beneficial Owner system securely.

- **Consult or register information** related to Ultimate Beneficial Owners, according to the permissions and functionalities enabled for your profile.

⚠ Important: If you are not redirected automatically, please **verify** that your browser allows pop-ups and that there are no active blockers that may interfere with the operation of the site.

1.2.1 Technical Support

In the event of **technical failures**, platform errors, or any issues encountered during the registration or update of information, please contact the support line provided by **Banco de la República**:

Service hours

Monday to Friday, from **7:00 a.m. to 4:00 p.m. (Colombia Time)**

General Support Line:

+57 (601) 4849980, extension **1000**

+57 (601) 3431111, extension **1000**

⚠ Important: The General Support Lines are available in Spanish only.

1.2.1.1 Instructions for reporting technological failures different to phone contact

If you are unable to establish communication through the support phone lines, or if you do not speak Spanish, please email us at UAO-Beneficiarios-Finales@banrep.gov.co

In the **subject line**, please write: Technological Failure. In the **body of the message**, identify yourself with the name of the company and include a **brief description of the failure**.

1.2.2 Description of the registration screen

After selecting "**ENTER**", the system redirects you to **Banco de la República's** authentication screen, where you must provide your credentials to access the application.

Illustration 2: Registration screen

Visible elements on the screen:

- Type of document (*Cédula de ciudadanía*)
- Document number (*Número de documento*) - Do **not use spaces** or **special symbols**. (Example: -, /, _ . etc.).
- Password (*Contraseña*)
- Press the blue button "**Continue**" (*Continuar*) to send the information and proceed with the authentication process.

Additional links:

- **Forgot your password?** (*¿Olvidó su contraseña?*) – Option to recover access.
- **Don't have an account? Register now** (*No tiene una Cuenta? Regístrate ahora*) – Option to create a new account.

First time you enter - **Not registered yet?**

If this is your first time accessing the system and you do not have an account yet, please follow these steps to register.

1. On the login screen, locate the link that says: "**Don't have an account? Register now**" (*¿No tiene una Cuenta? (Regístrate ahora)*), which is found on the last line of the registration screen.
2. **Select this link** to access the registration form.
3. The system will redirect you to a new authentication screen.

1.2.2.1 Authentication with e-mail

Once the user selects "**Register now**", the following screen is presented to start the account creation process:

Illustration 3: E-mail verification

The screenshot shows the Banco de la República logo and name. Below it, the text reads: "La comprobación es obligatoria. Haga clic en el botón Enviar." There is a text input field labeled "Correo Electrónico" and a blue button labeled "Enviar código de comprobación".

Visible elements on the screen:

- **Field to enter e-mail:** The user must enter a valid and active **corporate email address**.
- Blue button "**Send verification code**" (*Enviar código de comprobación*): Allows to validate the e-mail entered.

⚠ Important: The **e-mail entered** will be used to send a **verification code**. This step is **mandatory** to continue with the registration in the system. **Please note that the e-mail you register will be used to access the site in the future.**

When registering or updating Ultimate Beneficial Owners' information, the system requires verifying the e-mail address provided. To do this, the following procedure must be followed:

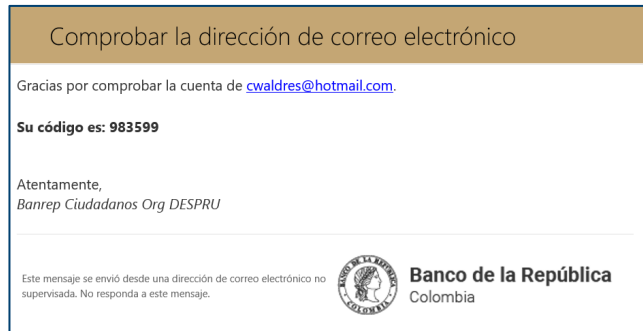
1. Send verification code: Click the **Send Verification Code** (*Enviar código de comprobación*) button, and the system will automatically send a verification code to the registered e-mail.
2. Verify e-mail: Enter your inbox of the e-mail provided and locate the message with the code sent to you.

⚠ Important: If you do not find the **message in the main inbox**, also check **the junk mail or spam folder**.

1.2.2.2 Verification e-mail

This is the message that external users receive in their inbox as part of the e-mail verification process so that the Bank's system can validate the e-mail registered.

Illustration 4: E-mail message with verification code



1.2.2.3 Code verification

Pressing the blue button **"Send check code"** (*Enviar código de comprobación*) will show you the following screen:

Illustration 5: E-mail validation using authentication code

1. **Enter the verification code** (*Código de verificación*) Enter the code received in your e-mail in the corresponding field. This code is necessary to validate the authenticity of the e-mail registered.
2. **Verify code:** Once the code has been entered, press the **"Verify code"** (*Comprobar Código*) button to continue with the process.
3. **Request new code** (*Enviar nuevo Código*) (**if necessary**): If you have not received the code, click the **"Send new code"** button to generate a new one.

1.2.2.4 E-mail verification screen

This screen corresponds to **Banco de la República's** system and is displayed once the user has successfully verified their e-mail address.

Illustration 6: E-mail verification

Banco de la República
Colombia

Dirección de correo electrónico comprobada. Puede continuar.

c*****@hotmail.com

Continuar

If the e-mail entered is correct, click the blue button "**Continue**" to continue with the process.

1.2.2.5 Account creation - ID validation

By pressing "**Continue**", the application takes you to the next screen where you must fill in the following fields: Document Type, ID Number, and Date of Issue of the ID Document dd/mm/yyyy.

Illustration 7: Account creation start screen

Banco de la República
Colombia

Pasaporte

PAD34567

Fecha de expedición

2 mayo 2022

Crear cuenta

1.2.2.6 External user account creation form

The following form will be displayed after selecting the "**Create Account**" (*Crear Cuenta*) option.

At this stage, you will need to verify that the information recorded is correct and fill in the fields that are still empty before continuing with the process.

Illustration 8: Register of personal user's information of the person recording ultimate beneficial owners Information, part I.

The screenshot shows the registration form for Banco de la República Colombia. The form includes the following fields and elements:

- Logo and Header:** Banco de la República Colombia.
- Email:** cvaldres@banrep.gov.co
- PA:** PA
- Identification Number:** PAD34567
- Fecha de expedición:** 2 mayo 2022
- Correo alternativo:** (Empty field)
- Ciudad:** Bogota
- Telephone No.:** 3123456787
- Authorization to process personal data:** Autorizo el tratamiento de mis datos personales
- Service Policy:** Estoy de acuerdo con la política de servicio
- Nombre:** (Empty field)
- Apellido:** (Empty field)
- Nueva contraseña:** (Empty field)
- Confirme su nueva contraseña:** (Empty field)
- Crear cuenta:** (Blue button)

Fill out the following fields:

1. **Alternate e-mail** (*Correo alternativo*): Field to enter an additional e-mail address.
2. **City** (*Ciudad*): Field to enter the city of residence.
3. **Telephone No.:** Field to enter the contact's phone number- Do **not use spaces** or **special symbols**. (Example: -, /, _ . etc.).
4. **Authorization to process personal data** (*Autorizo el [tratamiento de mis datos](#)*): Check box that the user must activate to authorize the processing of their data. This includes a link to the personal data processing policy.
5. **I agree with the service policy** (*Estoy de acuerdo con la [política de servicio](#)*) checkbox that the user must activate to accept the service policies. Includes a link to service policies.
6. **First name** (*Nombre*): If the application does not bring up your name, proceed to enter your name as it appears on your ID.
7. **Last name** (*Apellido*): If the application does not bring up your last name, enter your family name as officially registered.

8. **Password** (*Nueva contraseña*): Create a secure password that includes uppercase and lowercase letters, numbers, and special characters. Avoid using easily identifiable personal information.
9. **Password verification** (*Confirme su nueva contraseña*): Enter the same password again to confirm that it was entered correctly.
10. Press the blue button “**Create Account**” (*Crear Cuenta*).

! Important: Password and e-mail information must be **retained** for **future revisions** of the information registered.

1.2.2.7 Verification and registration

The following screen then appears to complete the verification and registration process.

Illustration 9: Register of personal user’s information of the person recording ultimate beneficial owners Information, part II.

The screenshot shows a registration form for Banco de la República Colombia. At the top left is the bank's logo. To its right, the text reads "Banco de la República" and "Colombia". Below this, the label "Fecha de nacimiento" is positioned above three dropdown menus for "Día", "Mes", and "Año". Underneath these is a single dropdown menu for "País de residencia". At the bottom center of the form is a blue button labeled "Continuar".

Fill in the data that appears on the screen:

Mandatory fields: Identified with asterisk (*)

- **Date of birth (*)** (*Fecha de nacimiento*)
Day (Día), **Month** (Mes), **Year** (año)
- **Country of residence (*)** (*País de residencia*)
- Press the button: “**Continue**” (*Continuar*).

Once registered, you can now authenticate yourself by filling out the fields that appear on the screen.

1.2.3 Entry of credentials as a registered user

Once you have created your account in the system, you can log in using the credentials previously registered. To do this, select your, type of ID number, enter your ID number (*Número de documento*) and password (*Contraseña*) in the corresponding fields. Finally, click the “**Continue**” (*Continuar*) button to access.

Illustration 10: Registration screen

Banco de la República
Colombia

Proporcione los siguientes detalles.

Cédula de ciudadanía

Número de documento

Contraseña

Continuar

[¿Olvidó su contraseña?](#)

[¿No tiene una cuenta? Registrarse ahora](#)

1.2.3.1 Verification e-mail

You will then receive a verification e-mail in your inbox as part of the e-mail verification process so that the Bank's system can validate the e-mail registered.

Illustration 11: E-mail message with Verification Code

Comprobar la dirección de correo electrónico

Gracias por comprobar la cuenta de wborda@asesoftware.com.

Su código es: 672523

Atentamente,
Banrep Ciudadanos Org DESPRU

Este mensaje se envió desde una dirección de correo electrónico no supervisada. No responda a este mensaje.

1.2.3.2 Code verification

Pressing the blue **“Continue”** (*Continuar*) button will show you the next screen.

Illustration 12: E-mail validation using authentication code

Banco de la República
Colombia

Se ha enviado el código de verificación a su Bandeja de entrada. Cópielo en el siguiente cuadro de entrada.

M*****@hotmail.com

Código de verificación

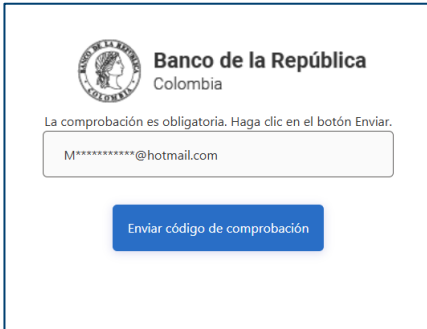
Comprobar código **Enviar nuevo código**

1. **Enter the verification code** (*Código de verificación*): Enter the code received in your e-mail in the corresponding field. This code is necessary to validate the authenticity of the registered e-mail.
2. **Verify code** (*Código de verificación*): Once the code has been entered, press the "**Verify code**" (*Comprobar Código*) button to continue with the process.
3. **Request new code (if necessary)**: If you have not received the code, click the "**Send new code**" (*Enviar nuevo Código*) button to generate a new one.

1.2.3.3 E-mail verification screen

This screen corresponds to **Banco de la República's** system and is displayed once the user has successfully verified their e-mail address.

Illustration 13: E-mail verification



The screenshot shows the e-mail verification interface for Banco de la República. At the top left is the bank's logo, a circular emblem with a figure and the text 'BANCO DE LA REPÚBLICA COLOMBIA'. To the right of the logo, the text reads 'Banco de la República Colombia'. Below this, a message states: 'La comprobación es obligatoria. Haga clic en el botón Enviar.' Underneath the message is a white text input field with a light gray border, containing the text 'M*****@hotmail.com'. At the bottom center of the form is a blue rectangular button with white text that says 'Enviar código de comprobación'.

If the e-mail entered is correct, click the blue button "**Send Verification Code**" (*Enviar código de comprobación*) to move forward in the process.

1.2.4 Change of user for registration or modification of information

In case your company is already registered in the system, but the person in charge of the initial registration is no longer part of the organization, or if for some reason the credentials (user, e-mail or password) previously associated are not available, the following procedure must be performed to guarantee the continuity of access and the security of the information:

1. **Formal request by the Legal Representative:** The legal representative of the company must send an e-mail to the area of Prevention of Money Laundering UAO Operations Analysis Unit at the following e-mail address: UAO-Beneficiarios-Finales@banrep.gov.co
2. **Content of the mail:** The message must include the following information:
 - Company name or business name.
 - Tax Identification Number (NIT).
 - Express request for change of user and e-mail associated with the account.

- Justification of the change (for example, dismissal of the previous user, loss of access, etc.).
- Data of the new user you want to associate (full name, institutional e-mail that will be used for registration, title).
- Contact phone number.

3. **Reasons for the change:** This request aims to:

- Allow updating or modifying the information registered in the system.
- Guarantee security, confidentiality, and traceability of the company's data.

2 ACCOUNT REGISTRATION - BUSINESS INFORMATION

2.1 Validity of the registration

The registration will remain valid for **one hundred and twenty (120) calendar days**, counted from the day following its completion. Once this period has elapsed, the registration will automatically lose its validity.

If after these 120 days, the user is subsequently requested to participate in a different transaction or process, they must log in to the platform again and update their information, even if no changes have occurred in the data previously provided.

Please remember that if, after the registration, any change occurs in the shareholding structure, the legal representative, or the individual holding the highest authority, you must keep the information updated. This obligation applies as long as there is an active relationship with the Bank.

2.2 Instructions for account registration

1. Central header:

- Title: “Ultimate Beneficial Owner (UBO)”
- Subtitle: “*Banco de la República*”



Sistema de Beneficiarios Finales
Banco de la República

2. Top right header:

- Menu with options:

Illustration 14: Header page



- Language change (Spanish **(ES)**/ English **(EN)**)
- Additional information (date: dd/m/yyyy, ID - *Your ID as entered in User Authentication*).
- “**Exit**” button, which allows you to exit the application.

3. Fields to be Completed

Illustration 15: Account registration screen – English

Account registration

Remember that fields marked with a star (*) are mandatory in order to continue with the process

Company ID *
Enter the tax identification number, fiscal identification number, company registration number, or another equivalent number including the verification digit. Do not use special characters.

Add ID Number

Name of the company *
Enter the exact name as it appears on the certificate of existence and legal representation.

Enter name

Associated mail *
It must be a corporate mail, preferably not associated with a person in order to have permanent accessibility.

cwaldres@hotmail.com

Colombian company or legally incorporated in Colombia *

Yes No

The field is required

I hereby declare that I am entitled to provide information regarding the legal person and/or natural persons required in this form and that this information is true, complete, and updated. *

The field is required
[Check the policies here](#)

Register

Follow these instructions to complete the registration form:

Mandatory fields: Identified with a star (*), must be completed to continue.

- Company ID number (*):** Enter the Tax ID or official company number, including the verification digit, if any.
 ⚠ Do not use spaces or special symbols. (Example: -, /, _ . etc.).
- Name of the company (*):** Enter the full name according to the legal certificate, including the corporate type (e.g. SA, LTD, GMBH).
 ⚠ Do not include periods or spaces in the acronym (e.g. “SA” instead of “S.A.”).
- Associated e-mail (*):** Must be corporate, not personal. For example:
contacto@company.com
- Colombian company or a company legally registered in Colombia:** Select “Yes” if the company is registered in Colombia; “No” if domiciled abroad.
 ⚠ Check the corresponding option according to the legal address.
- Declaration of power of attorney to provide information (*):** Check the box to declare that you have the authorization to provide the information registered and that it is true, complete, and up to date.
- Policy consultation:** By clicking on the link, you will be able to review the full data policy document

Illustration 16: Data policy

DATA POLICY

The information recorded through this tool shall be processed (collection, storage, use, circulation, or suppression) by BANCO DE LA REPÚBLICA (the Central Bank of Colombia) with the purpose of advancing all necessary procedures within the operation framework of the Money Laundering and Financing of Terrorism Risks Management System (SARLAFT), compliance of controls as established by the law, and, in any case, to fulfill the institution's constitutional and legal functions.

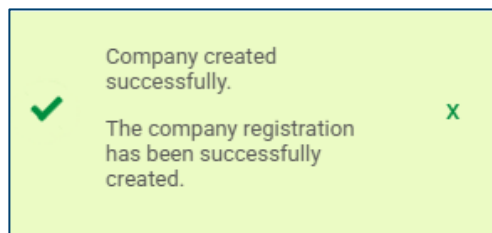
In every case, BANCO DE LA REPÚBLICA will process personal data in accordance with the policies or general guidelines available on its website

<http://www.banrep.gov.co/proteccion-datos-personales>

ACCEPT

Once you press “**Register**”, the following message appears:

Illustration 17: Message confirming successful creation of the company.



3 MANDATORY QUESTIONS ABOUT ULTIMATE BENEFICIAL OWNER (UBO)

3.1 Question about internal guidelines or regulations for foreign legal entities

When registering as a foreign company, the following question will be displayed:

Illustration 18: Mandatory question on FATF recommendations

Mandatory Disclosure of Ultimate Beneficial Owners

1. In compliance with FATF recommendations on the transparency of ultimate beneficial owners to third parties, the Central Bank has implemented procedures to collect this information through this form.

In accordance with current regulations in Colombia (particularly, Article 631-5 of the Tax Law and Resolution DIAN 000164 of 2021) final beneficiary refers to natural persons who meet any of the following criteria:

1. Direct or indirect ownership:
 - Holds 5% or more of the capital or voting rights.
 - Benefit for 5% or more from assets, returns or profits.
2. Effective control:
 - Exercises direct or indirect control over the legal person by any means (e.g., strategic decisions, appointment of managers, financial agreements).
3. Legal representation or higher authority:
 - If no beneficiary is identified under the above criteria, then state the legal representative.
 - If there is a natural person with greater authority in management or leadership, the latter is reported instead of the legal representative.

This implies that you must inform the shareholding composition of each legal person involved leading to the natural final beneficiaries, even if there are multiple ownership levels.


¿Do any legal provisions in your home country prevent your company from providing information about final beneficiaries?

Yes No

CONTINUE


- If you select “**NO**,” you will need to continue the process of registering Ultimate Beneficial Owner (UBO).
- By clicking the “**Continue**” button, the system will automatically activate the next question.
- If you select “**YES**”, the system will automatically display an additional section at the end of the screen. It is emphasized that the legal provision referred to in the question must correspond to the current laws or regulations of the country of origin, **and not to the entity’s internal guidelines or internal policies.**

Illustration 19: Confirmation message of registration and completion.



Sistema de Beneficiarios Finales

Banco de la República

en v | 6 / 11 / 2025 | 

Mandatory Disclosure of Ultimate Beneficial Owners

✔ We have registered that **NEW INTERNATIONAL LLC** You are not required to provide the information on ultimate beneficial owners.

Under oath, I certify that the information contained and processed in this form is true and correct.

Thank you for completing the required information.

You can close this window to finish.

Press the “**Exit**” button and your registration will have successfully finished.

⚠ Important: Do not forget to **perform this action**. If you do **not press the “LOGOUT”** button, the information entered will not be recorded in the application.

3.2 Question about participation in stock exchange

If the answer to the question above was **“NO”**, the system will ask a new question:

Illustration 20: Mandatory question on ultimate beneficial owner’s report - participation in stock exchange

The screenshot shows the 'Sistema de Beneficiarios Finales' interface. At the top left is the logo of Banco de la República. The title 'Sistema de Beneficiarios Finales' and 'Banco de la República' are displayed. A 'LOGOUT' button is in the top right. Below the title is a dark blue header with the text 'Mandatory Disclosure of Ultimate Beneficial Owners'. The main content area contains question 2: '¿Is the company listed on the stock exchange and registered in the National Registry of Securities and Issuers (RNVE) and is it subject to disclosure requirements in the securities market, or is it listed on an international stock exchange?'. There are two radio buttons: 'Yes' (unselected) and 'No' (selected). At the bottom right are 'RETURN' and 'CONTINUE' buttons. The top right corner shows a language dropdown set to 'en', the date '30 / 1 / 2026', and a user ID 'CC-35473134'.

- If you answer **“NO”**, the application will enable the fields to record the information of Ultimate Beneficial Owners (UBO)
- If you answer **“YES”**, the application will display the following **process completion message**:

Illustration 21: Stock exchange participation confirmation message.

The screenshot shows the 'Sistema de Beneficiarios Finales' interface with a confirmation message. The top left features the Banco de la República logo. The title 'Sistema de Beneficiarios Finales' and 'Banco de la República' are present. A 'LOGOUT' button is in the top right. Below the title is a dark blue header with the text 'Mandatory Disclosure of Ultimate Beneficial Owners'. The main content area displays a green checkmark icon followed by the text: 'We have registered that PRUEBAS GMBH is listed on the stock exchange'. Below this is the statement: 'Under oath, I certify that the information contained and processed in this form is true and correct.' and 'Thank you for completing the required information.' The top right corner shows a language dropdown set to 'en', the date '16 / 3 / 2026', and a user ID 'CC-35474445'.

Press the **“Exit”** button to successfully complete the registration.

⚠ Important: Do not forget to **perform this action**. If you do not press the “**LOGOUT**” button, the information entered will not be recorded in the application.

4 REGISTRATION OF LEGAL REPRESENTATIVE OR PERSON WITH HIGHEST AUTHORITY

If you answered “**NO**” to the above question and pressed “**Continue**”, you will be directed to the **Legal Representative or person of higher authority position registration** module.

The screen displays the fields required to enter the **Legal Representative's** information; however, if you need to record the data of the **person with highest authority**, you must press the blue button identified as “**Enter Data of Person with the highest authority**” located at the bottom right of the grey box.

Clicking this button will display a new screen containing the same fields that were displayed for the registration of the legal representative.

Illustration 22: Legal representative information form

Data of Ultimate Beneficial Owner-UBO

DIE NEUE AVENTEUER GMBH 890789678

Who is the legal representative or natural person with the highest authority in the legal company?

Please register the relevant person, bearing in mind that they must be the legal representative, unless there is another natural person exercising greater authority regarding the functions or management of the company. In that case, the latter person must be reported.

Remember that fields marked with a star (*) are mandatory in order to continue with the process of filling the form of the person with the highest position of authority.

Legal representative

First name *	Middle name
<input type="text" value="Hans"/>	<input type="text" value="Adam"/>
Last name *	Second last name
<input type="text" value="Peters"/>	<input type="text" value="Add second last name"/>
Type of ID *	ID Number *
<input type="text" value="Passport (PS)"/>	<input type="text" value="abc89086"/>

SAVE AND CONTINUE

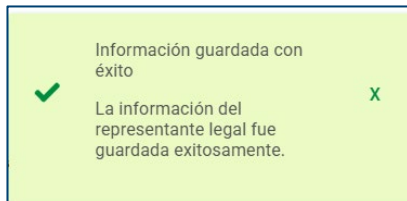
Complete the fields:

- **Mandatory fields:** Identified with a star (*), they must be completed to continue.

- **Names and surnames** (Enter the name as it appears on the ID without abbreviations)
- **ID Type** (select from the menu)
- **ID number:** (Full number without special characters, this field is alphanumeric).

When you complete the information, the “**Continue**” button will be activated, and the system will display the following pop-up message and direct you to the Ultimate Beneficial Owners Registration screen.

Illustration 23: Message confirming successful registration



5 REGISTER OF ULTIMATE BENEFICIAL OWNERS WITH CORPORATE PARTICIPATION EQUAL TO OR GREATER THAN 5%. - ULTIMATE BENEFICIAL OWNERS TREE

5.1 Generalities

In accordance with Article 631-5 of the Colombian Tax Statute, the term ultimate beneficial owner is defined as follows:

“An ultimate beneficial owner is the natural person(s) who ultimately owns or controls, directly or indirectly, a client and/or the natural person on whose behalf a transaction is conducted. It also includes the natural person(s) who exercise effective and/or final control, directly or indirectly, over a legal entity or any other structure without legal personality.

a) *The following shall be considered ultimate beneficial owners of a legal entity:*

1. *Any natural person who, acting individually or jointly, directly or indirectly holds five percent (5%) or more of the capital or voting rights of the legal entity and/or benefits from five percent (5%) or more of the entity’s assets, income, or profits; and*
2. *Any natural person who, acting individually or jointly, exercises control over the legal entity by any means other than those established in the previous numeral of this Article; or*
3. *When no natural person can be identified under the terms of the two previous numerals, the natural person who serves as the legal representative must be identified, unless there is a natural person who holds greater authority regarding the management or direction of the legal entity.*

b) *The following natural people shall be considered ultimate beneficial owners of a structure without legal personality or a similar arrangement:*

1. *Settlor(s), constituent(s), trustor(s), or any equivalent role.*
2. *Trustee(s) or an equivalent role.*
3. *Members of the fiduciary committee, financial committee, or an equivalent role.*
4. *Beneficiary(ies) or contingent beneficiary(ies); and*
5. *Any other natural person who exercises effective and/or final control, or who has the right to enjoy and/or dispose of the assets, benefits, proceeds, or profits.*

If a legal entity holds any of the capacities previously described for structures without legal personality or similar arrangements, the ultimate beneficial owner shall be the natural person who is the beneficial owner of that legal entity in accordance with this Article.

Paragraph 1. *For tax purposes, the term ultimate beneficial owner applies to the effective or real beneficiary and shall be understood in accordance with the definition stated in this Article.*

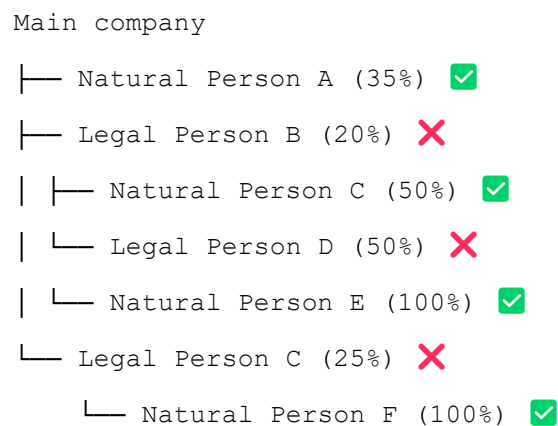
Paragraph 2. *This Article must be interpreted in accordance with the updated Recommendations of the Financial Action Task Force (FATF) and their respective interpretative notes.*

Paragraph 3. *The Special Administrative Unit – National Tax and Customs Authority (DIAN) shall regulate, through a resolution, the provisions of this Article and the terms and conditions for its effective implementation.”*

¿What does “up to the last beneficial owner” mean?

⚠ Important: The purpose of this ownership tree is to **identify all legal entities** that hold **direct or indirect ownership or control** over the company being registered, until reaching the natural persons who qualify as **Ultimate Beneficial Owners (UBOs)** in accordance with **Colombian regulations**.

Visual example




⚠ Important: If you have any questions regarding the Ultimate Beneficial Owner (UBO) registration process, or if you have been unable to complete your registration properly, please **contact the person responsible for your process** to receive further instructions.

5.1.1 Steps to build the entire tree

Step 1


- Register all shareholders (natural persons or legal entities) of the main company, that is, the company with which the Bank will establish the onboarding process, commercial relationship, or contractual engagement.

Step 2

- If one of the partners is a **company (legal entity)**, click on the **blue button**  in front of the name of the company to be completed.
- Register the partners of that company.
- Repeat this process **until all paths end in natural persons**, who meet the definitions of ultimate beneficial owner described at the beginning of this document.

⚠ Important: Do not click the “**Finish**” button if you have not completed the registration of the company’s Ultimate Beneficial Owners; this registration is mandatory.


5.1.2 System functions

Visualization of beneficiaries: Click on the **checkmark to the left of the company name**  to **open or close** the view of registered beneficiaries (natural or legal entities).



Correction of data:

- If you need **to modify a record**, **double-click the name of the beneficiary**.
- The form will open with the information registered.
- Make the necessary changes and **press “Save”** to update.

Deletion of records:


- If you make a mistake while registering data, you can **delete** it using the **trash icon**  that appears next to the beneficiary's name.

5.1.3 Visual indicators

- If you see a **gray checkmark** () in the tree, it means that **it is missing information**.
- If you see a **green checkmark** () in the tree, it means that the information is **complete**.

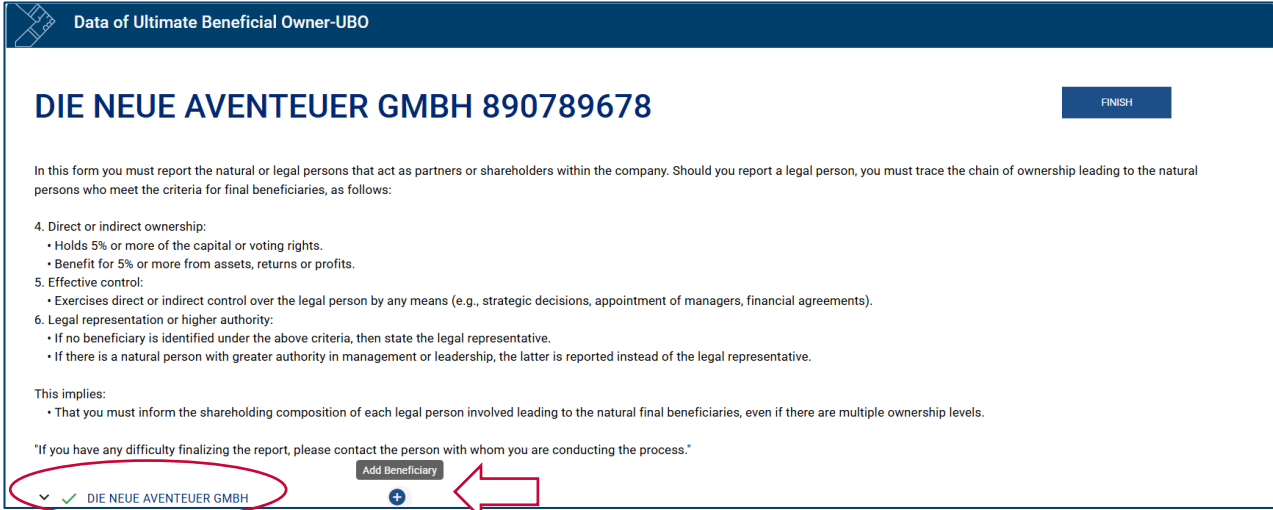
- The system **will not let you finish** until all the checkmarks appear in green indicating that you have completed all the levels.

5.2 Add ultimate beneficial owners – ultimate beneficial owners’ tree

Press the **Add Beneficiary** icon ( blue circle sign) that appears in front of the "Main Company Name" option. You will be recording the information of the **natural or legal entities** holding a stake in the **main company**.

Repeat this action to enter the information of related people by following the instructions below.

Illustration 24: Add ultimate beneficial owner button



Data of Ultimate Beneficial Owner-UBO

DIE NEUE AVENTEUER GMBH 890789678 FINISH

In this form you must report the natural or legal persons that act as partners or shareholders within the company. Should you report a legal person, you must trace the chain of ownership leading to the natural persons who meet the criteria for final beneficiaries, as follows:

4. Direct or indirect ownership:
 - Holds 5% or more of the capital or voting rights.
 - Benefit for 5% or more from assets, returns or profits.
5. Effective control:
 - Exercises direct or indirect control over the legal person by any means (e.g., strategic decisions, appointment of managers, financial agreements).
6. Legal representation or higher authority:
 - If no beneficiary is identified under the above criteria, then state the legal representative.
 - If there is a natural person with greater authority in management or leadership, the latter is reported instead of the legal representative.

This implies:

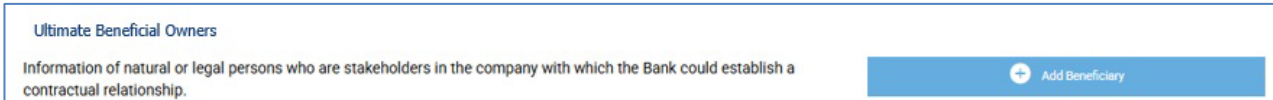
- That you must inform the shareholding composition of each legal person involved leading to the natural final beneficiaries, even if there are multiple ownership levels.

"If you have any difficulty finalizing the report, please contact the person with whom you are conducting the process."

DIE NEUE AVENTEUER GMBH Add Beneficiary +

When you press the blue button on the right hand “**Add Beneficiary**” you will see the following screen to the right:

Illustration 25: Screen to add ultimate beneficial owners



Ultimate Beneficial Owners

Information of natural or legal persons who are stakeholders in the company with which the Bank could establish a contractual relationship.

+ Add Beneficiary

Press the blue button “**Add Beneficiary**” and then you must include the natural or legal persons with corporate participation of the main company.

5.2.1 Select type of person to report

Select the type of person to report.

Illustration 26: Selection of natural or legal entity

Natural person Legal entity

5.2.2 Report of a natural person as an ultimate beneficial owner

1. Select the “**Natural Person**” option and the corresponding form will open.

Illustration 27: Income of natural person as an ultimate beneficial owner

Natural person Legal entity

First name * **Middle name**

Add first name Add middle name

Last name * **Second last name**

Add last name Add second last name

Type of ID * **ID Number ***

Add Type of ID Add ID Number

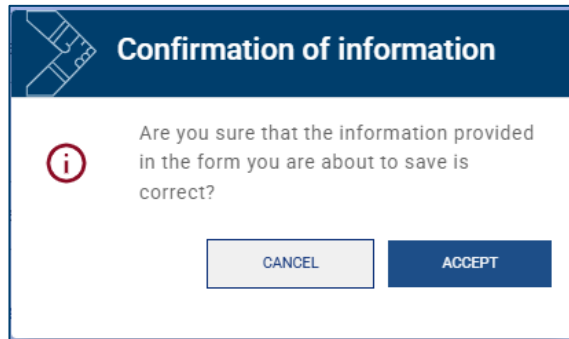
SAVE

Complete the fields:

- **Mandatory fields:** Identified with a star (*)
 - **First and last names:** Without abbreviations, as it appears on the ID
 - **Type of ID:** Choose from the drop-down list (CC, CE, DNI, DIE, PS, PEP, Other).
 - **ID number:** Alphanumeric field.
- ⚠ Do not include spaces or special characters (-, /, _ . \ etc.)

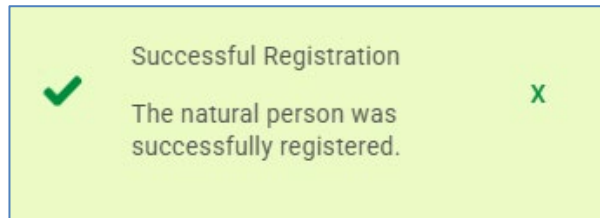
2. Save the record: Press “**Save.**” A confirmation message will appear.

Illustration 28: Confirmation message of information registered as ultimate beneficial owner



Press the blue button **“Accept”**. The application will show you a message confirming **“Successful Registration”**

Illustration 29: Successful registration message



5.2.3 Registration of legal entity

1. Select the **“Legal entity”** option and the corresponding form will open.

Illustration 30: Registration of a legal entity with equity participation

Natural person Legal entity

Entity's name *

Add name

Type of ID * **ID Number ***

Add Type of ID Add ID Number

Legal representative/Person with the highest position of authority

Legal representative Person with highest position of authority

First name * **Middle name**

Add first name Add middle name

Last name * **Second last name**

Add last name Add second last name

Type of ID * **ID Number ***

Add Type of ID Add ID Number

I do not have the information of the legal representative or the person with the highest position of authority.

SAVE

2. Complete the fields related to company information

- **Mandatory fields:** Identified with a star (*).
- **Company name:** Enter the full name as it appears on the certificate of existence and legal representation. Include the corporate type (e.g. SA, LTD), without periods (e.g. "SA" instead of "S.A.").
- **Type of ID:** Select from the drop-down list (NIT, NIF, NRE, RUT, Other).
- **ID number:** Alphanumeric field. Enter the full official number, including verification digits.
 - ⚠ Do not include spaces or special characters such as hyphens (-), bars (/), points (.), etc.

Complete the fields related to the **Legal Representative** or **person with highest authority**

Select the option to report.

Illustration 31: Selection of the legal representative or maximum authority in the ultimate beneficial owner system

Legal representative/Person with the highest position of authority

Legal representative
 Person with highest position of authority


Complete the fields:

- **Mandatory fields:** Identified with a star (*)
- **First and last names:** Without abbreviations, as it appears on the ID
- **Type of ID:** Choose from the drop-down list (CC, CE, DNI, DIE, PS, PEP, Other).
- **ID number:** Alphanumeric field.
 - ⚠ Do not include spaces or special characters (-, /, \ etc.)


⚠ **Important:** If you do not have information of the legal representative or person with the highest position authority, check the box “I do not have the information...” at the end of the form.

3. Save the record: Press “**Save.**” A confirmation message will appear.

Illustration 32: Confirmation message of information registered as ultimate beneficial owners



Confirmation of information

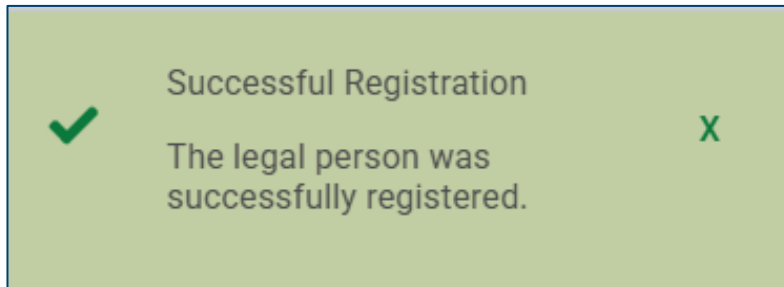


Are you sure that the information provided in the form you are about to save is correct?

CANCEL
ACCEPT

Press the blue button “**Accept**”. The application shows you a message of “**Successful Record**” or “**Error creating ultimate beneficial owner**”.

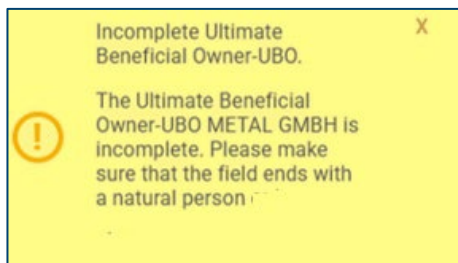
Illustration 33: Successful registration message




The system has confirmed the successful registration of the legal entity; however, it was detected that the information of ultimate beneficial Owners is incomplete.

⚠ Important: Remember that the ultimate beneficial owner must always be a **natural person**. Please ensure that the record does not end with a legal entity.

Illustration 34: Message of incomplete registration of ultimate beneficial owners - legal entity

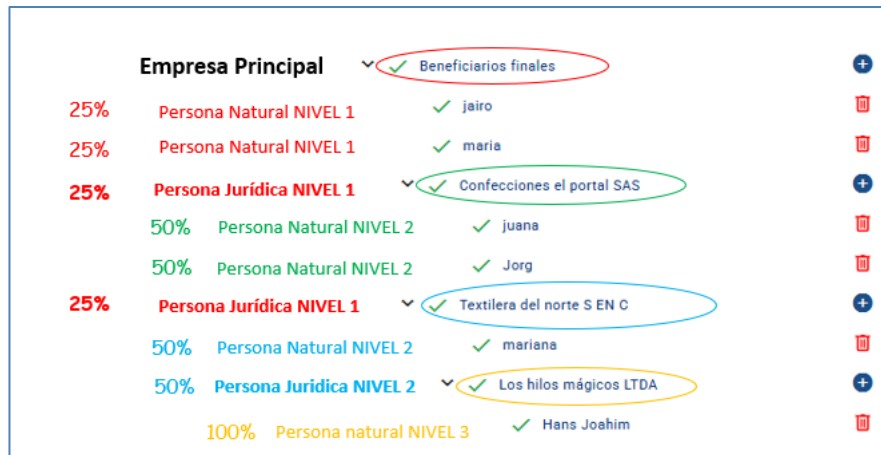


If any of the registered partners is a company (legal entity) and you find a gray checkmark next to the company, you must continue the registration of your own partners. To do so:

- Click on the blue button  which is on the right-hand side of the company name.
- The form will be opened to register the beneficiaries (natural or legal entities) of that company.
- Repeat this action for each company that appears in the Ultimate Beneficial Owners tree, until all paths end in natural persons.

5.3 Visualization of the finished tree

Illustration 35: Full tree



5.4 Completion of the ultimate beneficial owner registration

Once the information of all ultimate beneficial owners has been entered, the blue “Finish” button will be enabled at the top of the screen. When you click this button, you will be directed to the completion screen, where you will have the following options:

- **Return:** Allows you to return to the beneficiary registration module to make adjustments.
- **Accept:** By clicking this button, you certify **“Under penalty of perjury, that the information contained in and submitted through the form is true and correct.”**

To finalize the process correctly and ensure that all information is properly recorded, you must click the **“Logout”** button located in the upper right corner of the screen.

Illustration 36: Completion screen

If you access the application again, you will be able to modify the information previously recorded, in order to keep your data properly updated.

6 UPDATING THE INFORMATION REGISTERED

If the company is already registered in the Ultimate Beneficial Owners System and needs to **update the information previously reported**, you must log in to the platform again using the **same link as indicated in section 1.2.3** of this guide.

Upon accessing, the application will automatically redirect you to the **Mandatory Questions** described in **section 3**, displaying the information recorded in the latest update.

Illustration 37: Modification of mandatory questions regarding the registration of ultimate beneficial owners

Mandatory Disclosure of Ultimate Beneficial Owners

⊙ The responses presented were previously entered by a user in your company. If you have any internal guidelines or legal regulations that have prevented you from providing information about end beneficiaries, you will find the downloadable file attached.

Please check if the responses and/or attachment are still valid; otherwise, click the Update button to modify the information.

1. In compliance with FATF recommendations on the transparency of ultimate beneficial owners to third parties, the Central Bank has implemented procedures to collect this information through this form.

In accordance with current regulations in Colombia (particularly, Article 631-5 of the Tax Law and Resolution DIAN 000164 of 2021) final beneficiary refers to natural persons who meet any of the following criteria:

1. Direct or indirect ownership:
 - Holds 5% or more of the capital or voting rights.
 - Benefit for 5% or more from assets, returns or profits.
2. Effective control:
 - Exercises direct or indirect control over the legal person by any means (e.g., strategic decisions, appointment of managers, financial agreements).
3. Legal representation or higher authority:
 - If no beneficiary is identified under the above criteria, then state the legal representative.
 - If there is a natural person with greater authority in management or leadership, the latter is reported instead of the legal representative.

This implies that you must inform the shareholding composition of each legal person involved leading to the natural final beneficiaries, even if there are multiple ownership levels.

¿Do any legal provisions in your home country prevent your company from providing information about final beneficiaries?

Yes No

2. ¿Is the company listed on the stock exchange and registered in the National Registry of Securities and Issuers (RNVE) and is it subject to disclosure requirements in the securities market, or is it listed on an international stock exchange?

Yes No N/A

CONTINUE WITH NO CHANGES
UPDATE

6.1 Review and update of the information

- If the information is correct, click the **“Continue with no changes”** button.
- If the information requires adjustments, select the **“Update”** button.

The system will guide you again through the screens described in this guide, where you may modify your previous responses and update the data that was entered. The questions will be presented exactly as indicated in **section 3**. Please follow these instructions.

Based on the responses provided in the previous step, and if the system determines it is necessary, it will automatically direct you to the **legal representative or person with the highest authority** information screen, where you may perform the corresponding updates. Carefully review the information and make any adjustments you consider necessary.

Once you have completed the update, press the **“Save and Continue”** button.

Afterwards, the system will take you to the **Ultimate Beneficial Owner (UBO) registration tree**, where you may modify the existing information or enter new records, following the instructions outlined in **section 5** of this guide.

If you do not need to make any changes on this screen, select **‘Finish’** and follow the instructions indicated in Section 5.4.