



AML/ATF Compliance Attestation

December 3rd, 2019

Hereby, I would like to attest that Scotiabank Inverlat has in place a broad AML/ATF policy, known as the *Enterprise-wide AML & ATF and Sanctions Handbook*, which was developed by our corporate office, The Bank of Nova Scotia. The policy was developed considering the legislation, government regulations, international standards, and industry best practices.

Based on that corporate policy, Scotiabank Inverlat produced a document that contains such corporate AML/ATF policy as well as local legal requirements. This document is referred as the *AML/ATF Manual* and, in Mexico, it is a legal obligation to submit it to the local regulator, the CNBV (National Banking and Stock Commission); this liability was complied with in July 2019.

Some of the key elements contained in the *AML/ATF Manual* and that Scotiabank Inverlat, as a financial institution, is required to comply with, are the following:

- Procedures and internal controls systems, designed to ensure ongoing compliance with applicable AML/ATF laws and regulations are in place.
- A robust Know your Client chapter states procedures to meet or exceed the AML-related client identification requirements.
- As part of the risk management practice, the customers' database is frequently screened against black lists such as ONU and OFAC (Office of Foreign Assets Control).
- The updates on the List of Blocked Persons, issued by the local regulator, are immediately checked against the customers' database.
- There are risk-based measures to monitor the transactions of customer's accounts in order to identify reportable transactions.
- AML/ATF training programs have been designed to target both, senior managers as well as all the organization employees.

Hence, to the best of my knowledge, Scotiabank Inverlat complies with the AML/ATF Program and it has not been imposed any material penalties, by relevant authorities, regarding any serious breaches to the AML/ATF Program.

Sincerely,

A handwritten signature in black ink, enclosed within a large, hand-drawn oval. The signature appears to be "Alejandro Tovar Álvarez".

Alejandro Tovar Álvarez
AML/ATF Program Director
Scotiabank Inverlat, S.A., Institución de Banca Múltiple,
Grupo Financiero Scotiabank Inverlat.