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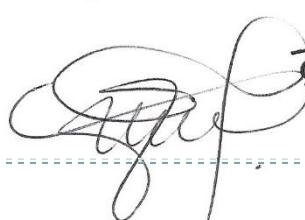
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Manual for Self-control and Integral Risk Management System of ML/TF/FPWDM - SAGRILAFT

November 2nd, 2023

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MANUAL DEL SISTEMA DE AUTOCONTROL Y GESTIÓN
DEL RIESGO INTEGRAL DE LA/FT/FPADM - SAGRILAFT
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INTRODUCTION

Money Laundering, Terrorist Financing, and Financing the Proliferation of Weapons of Mass Destruction (hereinafter ML/TF/WMD) are criminal phenomena that generate negative consequences for the country's economy and for real sector companies within any economy, affecting their competitiveness, reputation, productivity, and durability. This is why governments and control bodies currently pay attention to this phenomenon, recommending or requiring companies in both the financial and the real economic sectors to implement a **Risk Management System for its prevention and administration**. Voluntary or involuntary participation in the commission of these crimes has the consequence of being included in restrictive lists that will restrict or make it impossible for customers and suppliers to access the real economic sector system and may even lead to its liquidation, due to the measures adopted by the competent authorities.

Proceeding within this framework and taking into account the initiatives that aim to maintain the operation in a security environment, transparency, and trust, it is a best practice to implement tools that allow managing ML/TF/FPWMD risks and to advance valid actions to extend this effort to all or some of the stakeholders, national and international companies in the sector, entities, and communities close to the company's operation.

This manual becomes a clear and simple tool to transmit basic knowledge, control mechanisms, and policies defined by EXPOGANADOS DE COLOMBIA S.A.S. for ML/TF/FPWMD risk management.

The policies and procedures detailed in this document are mandatory for all employees of the company to carry out transactions with individuals or legal entities belonging to any of the interest groups defined by EXPOGANADOS DE COLOMBIA S.A.S.

CHAPTER I. GENERAL CONSIDERATIONS

1. GENERAL INFORMATION

1.1. SELF-SEL-CONTROL OBJECTIVE AND RISK MANAGEMENT OF ML/TF/FPWMD

Implement a System of Self-Control and Management of the Comprehensive Risk of Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction (SAGRILAFT), which allows EXPOGANADOS DE COLOMBIA S.A.S. to effectively identify, measure, control and monitor the risks associated with ML/TF/WMD, and by virtue of this, minimize the risk of being used for the commission of criminal activities.

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1.2. SPECIFIC OBJECTIVES OF SELF-MONITORING AND RISK MANAGEMENT FOR ML/TF/WMD

In order to properly manage the risk of money laundering, terrorist financing, and financing for the proliferation of weapons of mass destruction and advance the control and timely management environment for Society, our Comprehensive Risk Management and Self-Control System for Money Laundering, Terrorist Financing and Financing for the Proliferation of Weapons of Mass Destruction (ML/TF/WMD) pursues the following specific objectives:

- ❖ Minimize the company's exposure to the risks of Money Laundering and Terrorist Financing.
- ❖ Promote in EXPOGANADOS DE COLOMBIA S.A.S., the culture of Risk Management of Money Laundering, Terrorism Financing, and Financing for the Proliferation of Weapons of Mass Destruction.
- ❖ Project an image of reliability and transparency outside the entity.
- ❖ Prevent the introduction of resources from activities related to money laundering and/or the financing of terrorism and/or financing for the proliferation of weapons of mass destruction.
- ❖ Prevent, detect, and avoid, that in the execution of its operations and services, the sector be used as a means to give legitimacy to illicit activities.
- ❖ Identify the risk factors and associated risks to which the financial system is exposed in relation to ML/TF/FPWMD risk.
- ❖ Establish the inherent risk profile, both in disaggregated and consolidated form, in each ML/TF/FPWMD risk factor and its associated risks.
- ❖ Ensure that controls are comprehensive of all risks and that they are operating in a timely and effective manner.
- ❖ Develop an effective follow-up process that facilitates the rapid detection and correction of deficiencies in the SAGRILAFT stages.

1.2. SCOPE OF APPLICATION

The scope of the actions and strategies that EXPOGANADOS DE COLOMBIA S.A.S. has implemented for compliance with the SAGRILAFT system, covers all levels in the organizational structure and makes synergy in each functional area through its collaborators and liaison with the Compliance Officer.

The decisions of EXPOGANADOS DE COLOMBIA S.A.S. Shareholders General Assembly about the reasonable measures for ML/TF/FPWMD Risk prevention to be adopted are mandatory for the Legal Representative, Administrators, and other collaborators or interested parties.

The counterparties that involve an ML/TF/FPWMD risk factor for which these guidelines are determined, are the following:

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- Shareholders
- Investors
- Treasury Operations
- Suppliers and contractors
- Clients
- Employees

1.3. ETHICAL AND PROFESSIONAL COMMITMENT

EXPOGANADOS DE COLOMBIA S.A.S. has established in its SAGRILAFT a culture of compliance, based on the ethical and professional commitment of the members of the Shareholders, Collaborators, Customers, Suppliers, Competition, Regulatory Entities, and other third parties linked to EXPOGANADOS DE COLOMBIA S.A.S., to mitigate the risk that the company is used directly or through its business activities as an instrument to give the appearance of legality to goods acquired through illicit activities or to finance terrorism.

Consequently, EXPOGANADOS DE COLOMBIA S.A.S. is willing to comply with the obligation to collaborate with all national and international authorities to fight the crimes of money laundering, financing of terrorism, and financing the proliferation of weapons of mass destruction.

1.4 REGULATORY FRAMEWORK

1.1.1 International Regulations

Colombia has ratified the following United Nations conventions, in order to fight criminal activities related to ML/TF/FPWMD

- Vienna Convention of 1988: United Nations Convention against Traffic in Narcotic Drugs and Psychotropic Substances. (Approved by Law 67 of 1993 Judgment C-176 of 1994).
- United Nations Convention for the Suppression of Financing of Terrorism (Approved by Law 806 of 2003 - Judgment C-037 of 2004).
- Palermo Convention, TOC Convention, UNTOC, United Nations Convention against Transnational Organized Crime Approved by Law 800 of 2003 - Judgment C-962 of 2003).
- UN Convention against Corruption, UNCAC, United Nations Convention against Corruption (Approved by Law 970 of 2005 - Judgment C - 172 of 2006).
- In 1990, FATF designed forty (40) recommendations to fight money laundering and subsequently established nine (9) special recommendations against the financing of terrorism.
- In 2000, -GAFISUD- was created, made up of countries in South America and Mexico, including Colombia, where the commitment to adopt the FATF recommendations was made.

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In February 2012 the FATF revised these recommendations and issued the International Standards on Fighting Money Laundering and the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, making some modifications so that countries adopt a risk-based approach, with more flexible measures commensurate with the nature of their risks, thus channeling their efforts more effectively.

1.5.2. Local Regulations

According to the provisions of Article 84 of Law 222 of 1995 and Decree 4350 of 2006, the Superintendency of Companies is responsible for monitoring commercial companies, branches of foreign companies, and sole proprietorships, in the terms established in the aforementioned provisions, being empowered to ensure that the companies monitored in their formation, operation and in the development of their corporate purpose comply with the law and the bylaws.

- Paragraph 3 of Article 86 of Law 222 of 1995 states that the Superintendency of Companies, within its functions, is empowered to impose successive sanctions or fines, or not, up to two hundred legal minimum monthly wages, whatever the case may be, on those who fail to comply with its orders, the law or the statutes.
- Article 10 of Law 526 of 1999, amended by Law 1121 of 2006, states that the authorities exercising inspection, surveillance, and control functions must instruct their supervisees on the characteristics, periodicity, and controls concerning the information to be reported to the UIAF, in accordance with the criteria and indications received.
- Article 20 of Decree 1497 of 2002 provides that public and private entities belonging to sectors other than the financial, insurance, and stock exchange sectors, must report suspicious transactions to the UIAF, under numeral d) paragraph 2 of Article 102 and Articles 103 and 104 of the Organic Statute of the Financial System. when said Unit, in the manner and opportunity, indicated make the request.
- Article 7 of Decree 1023 of 2012, establishes in its numeral 26 that it is the function of the Superintendency of Companies to train the entities subject to its supervision on the measures they must adopt for the prevention of the risk of money laundering and the financing of terrorism.
- The National Council for Economic and Social Policy - CONPES on December 18, 2013, approved CONPES Document 3793. The general objective of this CONPES document is to establish the guidelines for the implementation of the National Anti-Money Laundering and Countering the Financing of Terrorism Policy to achieve a single, coordinated, dynamic, and more effective system for the prevention, detection, investigation, and prosecution of money laundering and the financing of terrorism.
- Article 20 of Law 1121 of 2006 regulates the procedure for the publication and fulfillment of the obligations related to Binding Lists for Colombia in accordance with International Law.

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- Through Law 1186 of 2009, declared enforceable by constitutional judgment C-685 of 2009, the "Memorandum of understanding between the governments of the states of the Financial Action Task Force of South America with the side of assets (FAFISALUD)" was approved, by means of which the Financial Action TASK Force of South America against Money Laundering (today GAFILAT) was created and put into operation and the objective was determined to recognize and apply the FATF Recommendations against money laundering and the recommendations and measures adopted in the future by that body. Article 2.14.2 of Decree 1068 of 2015 provides that public and private entities belonging to sectors other than the financial, insurance, and stock exchange sectors must report Suspicious Transactions to the UIAF, in accordance with paragraph d) paragraph 2 of Article 102 and Articles 103 and 104 of the Financial System Organic Statute, when requested by said Unit, in the manner and opportunity indicated.
- External Circular 100-000005 of 2014 issued by the Superintendency of Companies, where it creates the obligation to implement its supervised entities that comply with certain System characteristics of Self-Control and Risk Management of Money Laundering and Terrorism Financing ML/TF.
- Public Notice 100-000016 of 2020 issued by the Superintendency of Companies, where it fully modifies Chapter X of the Basic Legal Notice of 2017 (Public Notice No. 100-000005 of November 22, 2017). Which aims to deepen the risk-based approach both in the supervision of the Superintendence of Companies and in the creation of policies and matrices by commercial companies, branches of foreign companies, and sole proprietorships duty-bound to comply with the AUTOCTRONTROL regime and COMPREHENSIVE RISK MANAGEMENT LA/FT/FPADM and REPORTING OF SUSPICIOUS TRANSACTIONS TO the UIAF.
- Public Notice No. 100-000004 of 2021 issued by the Superintendency of Companies, which aims to deepen the risk-based approach both in the supervision of the Superintendency of Companies and in the creation of policies and matrices by commercial companies, branches of foreign companies and sole proprietorships required to comply with the AUTOCTRONTROL regime and INTEGRAL RISK MANAGEMENT LA/FT/FPADM and REPORTING OF SUSPICIOUS TRANSACTIONS TO the UIAF.
- Notice 100-000015 of September 24th, 2021.
- Law 1474/2011: Anti-Corruption Statute

CHAPTER II. - DEFINITIONS

VIRTUAL ASSET: It is the digital representation of value that can be traded or transferred digitally and can be used for payments or investments. Virtual assets do not include digital representations of fiat currency, securities, and other financial assets that are already covered elsewhere in the FATF Recommendations.

ASSETS: It is a present economic resource controlled by the Company as a result of past events.

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DNFBP: These are the designated non-financial activities and professions of Companies, which for the purposes of this circular are the following: i) real estate agent's sector; ii) precious metals and precious stones marketing sector; iii) accounting services sector; and iv) legal services sector.

GEOGRAPHICAL AREA: It is the area of the territory where the Company carries out its activity.

CLOSE ASSOCIATES: It has the meaning established in Decree 1081 of 2015 and other regulations that modify, complement, replace, or add to it. It will be understood that this definition not only applies to close associates of PEPs but also to those of Foreign PEPs and PEPs of International Organizations.

FINAL BENEFICIARY: The natural person(s) who ultimately owns or controls a customer or the individual on whose behalf a transaction is made. It also includes the person(s) who exercise effective and/or final control, directly or indirectly, over a legal person or other structure without legal personality. The following are the Final Beneficiaries of the legal entity:

1. Natural person who, acting individually or jointly, exercises control over the individual, under the terms of article 260 et seq. of the Commercial Code; or
2. Natural person who, acting individually or jointly, owns, directly or indirectly, five percent (5%) or more of the capital or voting rights of the individual, and/or benefits from five percent (5%) or more of the income, profits, or assets of the individual.
3. When no natural person is identified in paragraphs 1) and 2), the natural person who holds the position of a legal representative, unless there is a natural person who holds greater authority concerning the management or direction functions of the individual.

The following natural persons are Final Beneficiaries of a fiduciary contract, of a structure without legal personality or of a similar legal structure, who hold the quality of:

- I. Trustor(s), settlor(s), constituent(s) or similar or equivalent position.
- II. Trusteeship Committee, Finance Committee, or similar or equivalent position.
- III. Trustee(s), beneficiary(ies) or conditional beneficiaries; and
- IV. Any other natural person who exercises effective and/or final control, or who is entitled to enjoy and/or dispose of the Assets, benefits, results, or profits.

COUNTERPARTY: means any natural or Individual with whom the Company has commercial, business, contractual, or legal ties of any kind. Among others, the partners, employees, customers, contractors, and suppliers of the Company's Products are counterparties.

DUE DILIGENCE: It is the process by which the Company adopts measures for the knowledge of the Counterparty, its business, operations, and Products, and the volume of its transactions, which is established in section 5.3.1 of this Chapter X.

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INTENSIFIED DUE DILIGENCE: It is the process by which the Company adopts additional measures and with greater intensity for the knowledge of the Counterparty, its business, operations, Products, and the volume of its transactions, as established in section 5.3.2 of this Chapter X.

COMPANY: It is the commercial company, sole proprietorship, or branch of a foreign company supervised by the Superintendency of Companies.

DUTY-BOUND COMPANY: It is the Company that must comply with the provisions of this Chapter X and that are listed in numeral 4 of said chapter.

TERRORIST FINANCING OR TF: It is the crime regulated in article 345 of the Colombian Criminal Code (or the rule that replaces or modifies it).

FINANCING THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION OR FPWMD: It is every action that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, transfer of material, fractionation, transport, transfer, deposit or dual use for illegitimate purposes in contravention of national laws or international obligations, when the latter is applicable.

ML/TF/FPWMD RISK FACTORS: These are the possible elements or causes generating the ML/TF/FPWMD Risk for any Duty-bound Company. The Duty-bound Company must identify them considering the Counterparties, the Products, the activities, the channels, and the jurisdictions, among others.

FATF – Financial Action Task Force Intergovernmental group created in 1989 to issue standards to countries for the fight against ML, TF and FPADM.

FATFLAT: It is the Financial Action Task Force of Latin America, a regional body of the FATF, created in 2000 of which Colombia is a member.

TOTAL INCOME: All income recognized in the income statement for the period, as the main source of information on the financial activity of a Company for the reporting period. According to the disclosure criteria, these include Revenue, other income, profit (other items that meet the definition of income but are not Revenue), and financial income.

INCOME FROM ORDINARY ACTIVITIES: These are those that are generated during the main activities of the Company's business.

ML/TF/WMD: For purposes of this Chapter X, this means Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction.

MONEY LAUNDERING ML: It is the crime typified in Article 323 of the Colombian Criminal Code (or the rule that replaces or modifies it).

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BINDING LISTS: These are those lists of persons and entities associated with terrorist organizations that are binding on Colombia under Colombian law (Article 20 of Law 1121 of 2006) and in accordance with international law, including, but not limited to Resolutions 1267 of 1999, 1373 of 2001, 1718 and 1737 of 2006, 1988 and 1989 of 2011, and 2178 of 2014 of the United Nations Security Council, and all those that succeed, relate and complement it, and any other list binding on Colombia (such as the terrorist lists of the United States of America, the European Union list of Terrorist Organizations and the European Union list of Persons Categorized as Terrorists). The Superintendency of Companies will maintain on its website a list of the Binding Lists for Colombia as a guide, without these being exhaustive.

ML/TF/FPWMD RISK MATRIX: It is one of the instruments that allows a Company to identify, individualize, segment, evaluate, and control the ML/TF/FPWMD Risks to which it could be exposed, according to the identified ML/TF/FPWMD Risk Factors.

REASONABLE MEASURES: Sufficient, appropriate, and measurable actions in quality and quantity to mitigate ML/TF/FPWMD Risk, taking into account the Obligated Company's risks and their materiality.

COMPLIANCE OFFICER: This is the natural person designated by the Duty-bound Company who is responsible for promoting, developing, and ensuring compliance with the specific procedures for the prevention, updating, and mitigation of ML/TF/FPWMD Risk, and whose profile is indicated later in this Chapter X.

UNUSUAL TRANSACTION: It is the operation whose amount or characteristics are not related to the ordinary economic activity of the Duty-bound Company or, due to its number, quantity, or characteristics, is not framed in the normality guidelines or ordinary practices of business in a sector, in an industry or with a class of Counterparty.

SUSPICIOUS OPERATION: It is the Unusual Operation that, in addition, according to the uses and customs of the activity in question, could not be reasonably justified. This type of transaction includes attempted or rejected transactions that contain characteristics that make them suspicious.

PEP: It means Politically Exposed Persons, that is, they are the public servants of any system of nomenclature and classification of jobs of the national and territorial public administration, when in the positions they occupy, they have in the functions of the area to which they belong or in those of the employment file they occupy, under their direct responsibility or by delegation, the general direction, of formulation of institutional policies and adoption of plans, programs and projects, the direct management of assets, money or values of the State. These can be through expenditure management, public procurement, investment project management, payments, liquidations, and administration of movable and immovable property. It also includes Foreign PEPs and PEPs of International Organizations.

PEP OF INTERNATIONAL ORGANIZATIONS: They are those natural persons who exercise managerial functions in an international organization, such as the United Nations Organization, Organization for Economic Cooperation and Development, the United Nations Children's Fund (UNICEF) and the Organization of American States, among others (vr. gr. directors, deputy directors, board members

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director or any person exercising an equivalent function).

FOREIGN PEPs: They are those natural persons who perform prominent and prominent public functions in another country. In particular, the following persons: (i) heads of state, heads of government, ministers, undersecretaries or secretaries of state; (ii) congressmen or parliamentarians; (iii) members of supreme courts, constitutional courts or other high judicial bodies whose decisions do not normally admit of appeal, except in exceptional circumstances; (iv) members of courts or the boards of directors of central banks; (v) ambassadors; (vi) business managers; (vii) senior officials of the armed forces; (viii) members of the administrative, management or supervisory bodies of state-owned enterprises; (ix) members of reigning royal families; (x) prominent leaders of political parties or movements; and (xi) legal representatives, directors, deputy directors, members of senior management and members of the Board of an international organization (e.g. heads of state, politicians, senior government, judicial or military officials and senior executives of state enterprises).

ML/TF/FPWMD POLICY: These are the general guidelines that each Obligated Company must adopt so that it is able to identify, evaluate, prevent, and mitigate the ML/TF/FPWMD Risk and the associated risks. Each of the stages and elements of SAGRILAFT must have clear and effectively applicable policies. The policies must be incorporated into the procedures manual that guides the actions of the Company's officials for the operation of SAGRILAFT and establish consequences and penalties for non-compliance.

PRODUCTS: These are the goods and services that the Company produces, markets, transforms, or offers or acquires from a third party.

FATF RECOMMENDATIONS: These are the 40 recommendations designed by the FATF with its interpretative notes, to prevent ML/TF/FPWMD Risk, which were reviewed in February 2012 and updated in June 2019. The result of this review is the document called "International Standards on Combating Money Laundering, Financing Terrorism and Financing the Proliferation of Weapons of Mass Destruction".

SELF-CONTROL AND COMPREHENSIVE RISK MANAGEMENT REGIME LA/FT/FPADM: It is the SAGRILAFT and the Minimum Measures Regime, as a whole.

MINIMUM MEASURES REGIME: These are the obligations in terms of self-management and control of ML/TF/FPWMD Risk, provided for in paragraph 8 of Chapter X.

LA/FT/FPADM RISK: It is the possibility of loss or damage that a Company may suffer due to its propensity to be used directly or through its operations as an instrument for the Laundering of Assets and/or the channeling of resources towards terrorist activities or the Financing of the Proliferation of Weapons of Mass Destruction, or when the concealment of Assets derived from such activities is intended. The contingencies inherent to ML/TF/FPWMD materialize through risks such as Contagion Risk, Legal Risk, Operational Risk, Reputational Risk and the others to which the Company is exposed, with the consequent negative economic effect that this may represent for its financial stability, when used for such activities.

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CONTAGION RISK: It is the possibility of loss that a Company may suffer, directly or indirectly, due to an action or experience of a Counterparty.

LEGAL RISK: The possibility of loss incurred by a Company when it is sanctioned or **duty-bound** to compensate damages because of non-compliance with rules or regulations and contractual obligations. Legal risk also arises because of failures in contracts and transactions, arising from malicious acts, negligence, or unintentional acts that affect the execution or implementation of agreements or transactions.

OPERATIONAL RISK: The possibility of incurring losses due to deficiencies, failures or inadequacies in human resources, processes, technology, infrastructure, or the occurrence of external events. This definition includes legal and reputational risks associated with these factors.

REPUTATIONAL RISK: The possibility of loss incurred by a Company due to loss of prestige, bad image, or negative publicity, whether true or not, concerning the organization and its business practices, causing loss of customers, decrease in revenues, or legal proceedings.

INHERENT RISK: The level of risk inherent to the activity, without taking into account the effect of controls.

RESIDUAL RISK: The resulting level of risk after applying controls.

STR: Suspicious Operations Report. It is an operation that, due to its number, quantity, or characteristics, does not fall within the normal system and practices of the business, an industry or a certain sector and, in addition, according to the uses and customs of the activity in question, could not be reasonably justified.

SIREL: It is the online reporting system managed by the UIAF. It is a WEB tool that allows reporting entities to upload and/or report online the information of the obligations established in the regulations of each sector, efficiently and safely, available 24 hours a day, 7 days a week, and 365 days a year.

SAGRILAFT: It is the self-control and comprehensive risk management system of ML/TF/FPWMD established in Chapter X.

SMLMV: It is the current legal monthly minimum wage.

UIAF: It is the Financial Information and Analysis Unit, which is the financial intelligence unit of Colombia, with the function of intervening in the economy to prevent and detect ML/TF/FPWMD.

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CHAPTER III. GENERAL ASPECTS OF MONEY LAUNDERING, TERRORIST FINANCING, AND THE FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

3.1. MONEY LAUNDERING CONCEPT

Money laundering is the process by which assets, resources, or assets of illicit origin are tried to give them the appearance of legality in order to introduce them into the formal economy through the real sector or the financial sector.

3.1.1 Money Laundering Stages

The money laundering process involves the execution of four independent stages, which can happen one after the other, or occur simultaneously:

- **Obtaining:** It is the performance of any of the criminal conduct indicated in the current criminal regulations (Article 323 of the Colombian Criminal Code and/or applicable international standards) from which the illicit assets, resources, or assets come.
- **Placement:** It is the activity aimed at putting goods, resources, or assets of illicit origin in the formal economy, especially in the financial sector or through goods or services in the real sector.
- **Stratification:** It is the execution of various transfers, purchases, sales, contracts, and operations, in different forms and sectors, to try to hide the illicit origin and hinder the traces of its origin, for which many and complex economic transactions are made.
- **Integration:** It is the mixture of illicit money with funds of legal origin to try to use the assets and enjoy the assets or resources with the appearance of legality.

Criminal Behaviors that Generate Money Laundering

In accordance with Article 323 of the Colombian criminal code, the criminal behaviors that typify money laundering are:

- ❖ Migrant Smuggling
- ❖ Human Trafficking.
- ❖ Extortion.
- ❖ Illicit enrichment
- ❖ Extortive kidnapping
- ❖ Rebellion.

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- ❖ Arms trade.
- ❖ Trafficking minors
- ❖ Financing of terrorism and administration of resources related to terrorist activities.
- ❖ Trafficking in toxic drugs, narcotics, or psychotropic substances.
- ❖ Offences against the financial and banking system.
- ❖ Misuse of funds raised from the public.
- ❖ Unauthorized transactions with Partners or associates.
- ❖ Massive and regular collection of money.
- ❖ Fraudulent handling of species registered in the national register of securities and issuers.
- ❖ Offenses against public administration such as:
 - ❖ Embezzlement.
 - ❖ Omission of withholding agent or collector.
 - ❖ Allocation of resources from the treasury for the encouragement or undue benefit of exporters and traders of precious metals.
- ❖ Concussion.
- ❖ Bribery.
- ❖ Illegal closing of contracts
- ❖ Illicit enrichment of public employees.
- ❖ Crimes executed under conspiracy to commit a crime.
- ❖ All others considered as such by the international standards applicable in the jurisdictions in which it operates.

3.1.2 Money Laundering Commission Forms

Money laundering may be committed by any person who acquires, safeguards, invests, transports, transforms, stores, preserves, safeguards, or manages property that has its mediate or immediate origin in the criminal activities mentioned above.

3.2 FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

The financing of terrorism is the process by which the goods, resources, or assets of illicit or licit origin that serve to carry out terrorist activities are obtained, that is, those that generate anxiety, fear, or terror in the population through acts that endanger the life, physical integrity or freedom of people, buildings, means of communication, means of transport and means of processing or conduction of fluids or driving forces using instruments capable of wreaking havoc.

Financing the Proliferation of Weapons of Mass Destruction - (WMD) is an act to provide financial support or use financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, movement of material, fractionation, transport, transfer, storage or use of nuclear, chemical or biological weapons, their means of delivery and other related materials (including dual-use technologies and goods for illegitimate purposes) in contravention of national laws or international obligations, where applicable.

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3.2.1. Financing of terrorism and financing of the proliferation of weapons of mass destruction.

The process of financing terrorism that is carried out with goods, resources, or assets of licit or illicit origin, involves the execution of some stages similar to those of money laundering, as follows:

- a) **Obtaining:** It is the collection of funds of legal or illegal origin to support terrorist activities.
- b) **Placement:** It is the activity of putting legal or illegal resources in some formal or informal system in order to cover up the destination or use for terrorist purposes or for a terrorist organization.
- c) **Stratification:** It is the mixture of goods, resources, or assets of illicit or licit origin through various financial transactions.
- d) **Integration:** It is the way to use the funds and/or enjoy the assets, resources, or assets with the appearance of legality and hiding their destination for terrorist purposes or to support terrorist organizations.

3.2.2. Illegal conduct related to Financing of terrorism and financing of the proliferation of weapons of mass destruction.

The criminal behaviors related to the financing of terrorism in Colombia can be and generally are the same as those that generate money laundering, such as:

- ❖ Migrant Smuggling
- ❖ Human Trafficking.
- ❖ Extortion.
- ❖ Extortive kidnapping
- ❖ Rebellion.
- ❖ Arms trade.
- ❖ Trafficking human beings
- ❖ Financing of terrorism and administration of resources related to terrorist activities.
- ❖ Trafficking in toxic drugs, narcotics, or psychotropic substances.
- ❖ Offences against the financial and banking system.
- ❖ Misuse of funds raised from the public.
- ❖ Unauthorized transactions with Partners, Shareholders, or Associates.
- ❖ Massive and regular collection of money
- ❖ Fraudulent handling of species registered in the national register of securities and issuers.
- ❖ Offenses against public administration.
- ❖ Embezzlement.
- ❖ Omission of withholding agent or collector.
- ❖ Allocation of treasury resources for the encouragement or undue benefit of exporters and trading of precious metals

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- ❖ Concussion
- ❖ Bribery
- ❖ Unlawful conclusion of contracts
- ❖ Illicit enrichment of the public employee
- ❖ Crimes executed under conspiracy to commit a crime.

Additionally, the funds obtained legally or other derived from crimes that are not contemplated in Article 323 of the Colombian criminal code may be added, and the others are considered as such by the international standards applicable in the jurisdictions in which it operates.

3.2.3. Types of Terrorist Financing

In the Colombian case, the crime of financing terrorism and financing the proliferation of weapons of mass destruction affects public security and is directly related to criminal conduct such as:

- ❖ Training for illicit activities.
- ❖ Terrorism.
- ❖ Illegal use of uniforms and badges.
- ❖ Threats.
- ❖ Instigation to commit an offense.
- ❖ Incitement to commit military offenses.
- ❖ On the other hand, this crime is committed for or for the benefit of:
 - Organized crime groups or their members.
 - Illegal armed groups or their members.
 - Domestic or foreign terrorist groups or their members.
 - Domestic or foreign terrorist.

3.2.4. Types of Perpetration and Terrorist Financing Sanctions

Anyone who directly or indirectly provides, collects, delivers, receives, administers, contributes, protects, or guards funds, assets, or resources; or performs any other act that encourages, organizes, supports, maintains, finances or economically sustains subversive armed groups or their members; or domestic or foreign terrorist groups, or domestic or foreign terrorists, or terrorist activities; shall be liable to imprisonment from thirteen (13) to twenty-two (22) years and a fine from one thousand three hundred (1,300) to fifteen thousand (15,000) current legal minimum wages.

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3.3. EQUIVALENCY BETWEEN MONEY LAUNDERING, FINANCING OF TERRORISM, AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

Aspects	Money Laundering	Financing of Terrorism - FPADM
Source of Money	Domestic, from Criminal Organization	Internal, from cells that are self-financed through commercial activities.
Channels	Formal System	Informal money transaction systems.
Detection	Suspicious transactions such as deposits that do not correspond with the client's wealth and profile	Suspicious relationships, such as money transfers between unrelated parties.
Number of Transactions	Large amounts that normally are structured to avoid reporting requirements	Small amounts are usually below reporting limits.
Financing Activity	Internet transactions that include fake companies, bearer shares, and offshore	No clear operational profile for terrorists according to the U.S. Senate 9/11 Commission report.
Monetary Trace	Notice-The money normally ends up in the source's hands	Lineal - Generated money is used to support terrorist groups and criminal activities.

3.4. GENERAL TYPOLOGIES OF MONEY LAUNDERING, FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

The Perpetration of the crimes of money laundering, financing of terrorism, and financing of the proliferation of weapons of mass destruction can be carried out through the execution of modalities such as:

- ❖ Fictitious exports and imports of products and/or services.
- ❖ Fictitious foreign investment in a company.
- ❖ Substitution of an external debt contracted by a client of a local company using illicit money.
- ❖ International foreign exchange arbitrage by transporting illicit money.
- ❖ Fractional transfers of illicit money through international money orders.
- ❖ Use of illicit funds to reduce indebtedness or capitalize legitimate companies.
- ❖ Purchases of "awards" by a criminal organization.
- ❖ Declaration of fictitious award obtained abroad for the entry of illicit money into the country.
- ❖ Use of borrowed bank accounts to conceal payments for crimes.
- ❖ Transactions in abductee accounts.
- ❖ Extortion operations (millionaire ride – express kidnapping)
- ❖ Supply of goods and/or services for illegal groups.
- ❖ Collection-Payment of extortion for security or "permission".
- ❖ Use of bank accounts or former abductees' businesses that allow themselves to give the kidnapping organization's legal money appearance.
- ❖ Acquisition of goods or property by kidnappers' relatives or extortionists.

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- ❖ Payment in kind of illicit activities with goods smuggled into the national territory.
- ❖ Smuggling.
- ❖ Transportation of money from illicit activity to another country to acquire goods that enter the local country through technical smuggling or under-invoicing.
- ❖ Export of goods on invoices and subsequent re-entry of contraband to the national territory.
- ❖ Change of destination of raw materials that enter the country under the modality of special import-export systems. VALLEJO
- ❖ Technical smuggling through overvaluation of goods.
- ❖ Contraband by triangulation of goods.
- ❖ Use of legally established companies to support the activities of narco-terrorist organizations.

3.5. PURPOSES OF MONEY LAUNDERING, FINANCING OF TERRORISM, AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

Taking into account that both money laundering, terrorist financing, and financing of the proliferation of weapons of mass destruction come from illicit activities, criminal organizations seek to use their illicit profits with the appearance of legality to:

- a. Hide the origin and destination of goods, resources, or assets.
- b. Hindering the work of the authorities.
- c. Introduce them to the legal market, whether to the financial sector or the real economy.
- d. Guarantee the enjoyment of illicit/licit goods, resources, or assets or allocate them to terrorist activities.

3.6. CONSEQUENCES OF MONEY LAUNDERING, FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

It is possible that through companies it is possible to launder assets, terrorist financing, and proliferation of weapons of mass destruction; therefore, it is necessary to prevent, detect, and control those crimes established by criminal regulations, which entail consequences such as:

- a. Loss of reputation.
- b. Be included in international restrictive lists such as the OFAC List, UN List, and England Company List, among others.
- c. Loss of access to financial system services and products.
- d. Loss of business relationships.
- e. Deterioration of democratic institutions and national and international security.
- f. Business risks.
- g. Personal and institutional sanctions of a criminal, administrative, labor, and patrimonial nature.
- h. Strengthening of offenders.

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i. increase of new crimes.

3.7. BEST PRACTICES IN THE PREVENTION AND CONTROL OF THE RISK OF MONEY LAUNDERING, FINANCING OF TERRORISM, AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

Below are the best practices suggested by the UIAF that should be taken into account in the prevention and control of LAFT-FPADM risk:

- ❖ Never lend your name as an individual or as a legal entity.
- ❖ Never lend your financial products.
- ❖ Always ask about the origin and destination of the goods, resources, or assets with which you are going to do business.
- ❖ Always document the transactions you make.
- ❖ Always apply customer knowledge mechanisms.
- ❖ Always verify and analyze customer information.
- ❖ Always monitor customer operations.
- ❖ Always update procedure manuals.
- ❖ Always include controls in processes.
- ❖ Always know your market and that of your customers.
- ❖ Relying on technology to determine clients, markets, and risky operations.
- ❖ Always sensitize, train, and coach all employees.
- ❖ Always establish codes of conduct in which you identify risky situations and how employees should act.
- ❖ Always doubt the “easy deals.”
- ❖ Learn about the types or modalities through which money laundering and terrorist financing crimes are committed.
- ❖ Identify warning signs

It is the duty of all shareholders, collaborators, advisors, customers, suppliers, contractors, strategic allies, and other third parties related to EXPOGANADOS DE COLOMBIA S.A.S to be aware of and commit to the fight against money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction, putting all their efforts to prevent it from being involved in these illicit activities, not only because of the ethics that govern the company but also to comply with legal regulations.

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CHAPTER IV. – ORGANIZATIONAL STRUCTURE, ROLES, AND RESPONSIBILITIES

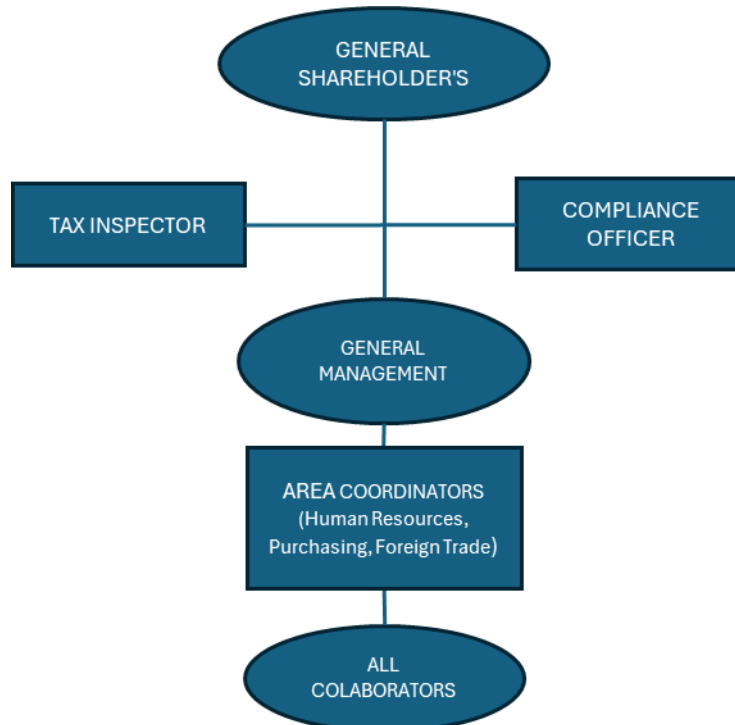
4.1 SAGRILAFT ORGANIZATIONAL STRUCTURE

The identification, segmentation, qualification, individualization, monitoring, control, and management of risks requires an adequate organizational structure, which has the areas and committees necessary to carry out said functions and avoids possible conflicts of interest through an adequate segregation of functions.

Risk Management is the responsibility of both the Management Bodies involved in managing the risk of Money Laundering, Terrorist Financing, and Financing of the Proliferation of Weapons of Mass Destruction, as well as the other collaborators of society, who must contribute to their performance with the guidelines outlined in this manual.

Our company, adapting to the scheme established in the SAGRILAFT standards, has designed the following organizational structure with its corresponding functions:

4.1.1 EXPOGANADOS DE COLOMBIA S.A.S. ORGANIZATIONAL CHART - SAGRILAFT



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Certificado de Idoneidad No. 456 de Septiembre 07-2016
E expedido por Universidad Nacional de Colombia.

Traducción Oficial

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MANUAL DEL SISTEMA DE AUTOCONTROL Y GESTIÓN
DEL RIESGO INTEGRAL DE LA/FT/FPADM - SAGRILAFT
2/11/2023

4.2 ROLES AND RESPONSIBILITIES

The responsibility for managing and controlling ML/TF/FPWMD risks, preventing the company from being used as an instrument for the materialization of these risks, corresponds to all employees of EXPOGANADOS DE COLOMBIA S.A.S. regardless of the process or area in which they work.

The main roles and responsibilities are also described below:

4.2.1 SHAREHOLDERS' MEETING

The General Assembly of Shareholders will have the following functions:

1. Review and approve prevention and control policies, strategies, plans, and programs submitted for consideration by the Compliance Officer, which include at least the following aspects:
 - a) Efficient, effective, and effective internal policies, procedures, and controls that ensure the System's own functioning.
 - b) Ongoing and permanent training programs for employees working in sensitive areas in ML/TF/FPWMD prevention and control.
 - c) Efficient, effective, and efficient mechanisms for the activities carried out through internal and external audits to identify, quantify, and control risks to which systems and activities are exposed, as well as evaluate them to identify, measure, and prioritize ML/TF/FPWMD risks.
 - d) Approve this Manual and its updates.
2. Timely analysis of the reports and requests submitted by the legal representative.
3. Receive and analyze the periodic reports prepared by the Compliance Officer, considering the deficiencies and weaknesses raised, as well as the recommendations indicated to improve the policies, procedures, and internal mechanisms continuously and permanently for the prevention and control of ML/TF/FPWMD, in order to implement the relevant corrective actions.
4. Speak out on the reports presented by the Tax Auditor's Office, which are related to the implementation or operation of the system and follow up on the observations or recommendations provided by them.
5. Provide the physical, administrative, and budgetary resources necessary for the System to be efficient, effective, and efficient.
6. Select and appoint the Compliance Officer and his/her deputy where appropriate.
7. Establish the criteria for approving the linking of PEPs counterparties.
8. Determine those responsible and the conditions, to carry out audits of the system.
9. Verify that the Compliance Officer has the necessary availability and capacity to perform his/her duties.
10. To verify that the Duty-bound Company, the Compliance Officer, and the legal representative carry out the activities designated in Chapter X and the SAGRILAFT.
11. Order and guarantee the technical, logistical, and human resources necessary to implement and

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keep the SAGRILAFT in operation, according to the requirements made for this purpose by the Compliance Officer

4.2.2 Legal Representative/General Manager

The General Manager will have the following responsibilities:

1. File with the Compliance Officer, for approval by the board of directors or the highest corporate body, the SAGRILAFT proposal and its updates, as well as its respective procedures manual.
2. Study the results of the ML/TF/FPWMD Risk assessment carried out by the Compliance Officer and establish the corresponding action plans.
3. Efficiently allocate the technical and human resources, determined by the General Shareholders' Meeting, necessary to implement SAGRILAFT.
4. Verify that the Compliance Officer has the necessary availability and capacity to perform his/her duties.
5. Provide effective, efficient, and timely support to the Compliance Officer in the drafting, direction, supervision, and monitoring of SAGRILAFT.
6. Submit to the General Shareholders' Meeting, the reports, requests, and alerts that it considers should be dealt with by said bodies and that are related to SAGRILAFT.
7. Ensure that the activities resulting from the development of the SAGRILAFT are duly documented, so that the information is allowed to meet integrity, reliability, availability, compliance, effectiveness, efficiency, and confidential criteria.
8. Certify before the Superintendency of Companies compliance with the provisions of Chapter X, when required by this Superintendency.
9. Recommend the person who will occupy the function of Compliance Officer, to be appointed by the highest corporate body.
10. Verify that the SAGRILAFT procedures develop the LA/FT/FPADM Policy adopted by the General Shareholders' Meeting.

4.2.3 Compliance officer

Profile: The compliance officer must have a second-level hierarchical position, that is, he has decision-making power, with direct communication with the highest corporate body of the company, since he uses his criteria and knowledge in the handling of confidential information to report the UIAF.

The Compliance Officer must be actively involved in the procedures for drafting system, direction, implementation, audit, compliance verification, and monitoring.

Requirements for the Compliance Officer nomination:

- Have a professional degree and accredit minimum experience of six (6) months in the performance of similar positions or aimed at the administration and risk management of ML/TF, additionally,

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accredit knowledge in matters of ML/TF risk management or ML/TF/FPWMD risk through specialization, courses, diplomas, seminars, congresses, or alike.

- Enjoy the ability to make decisions to manage ML/TF/FPWMD Risk and have direct communication with, and report directly to the General Shareholders Meeting.
- Have sufficient knowledge of risk management and understand the ordinary course of the Company's activities.
- Have the support of a human and technical work team, in accordance with the ML/TF/FPWMD Risk and the size of the Company.
- Not belong to the administration or the corporate bodies, nor to internal or external audit or control (fiscal auditor or linked to the fiscal auditing company that exercises this function, if applicable) or who executes similar functions or takes their place in the Company.
- Not serve as a Compliance Officer in more than ten (10) Companies. To act as Compliance Officer of more than one Company, the General Assembly of EXPOGANADOS DE COLOMBIA S.A.S. Shareholders must verify that, the Compliance Officer does not act as such in Companies that compete with each other.
- When the Compliance Officer is not employed by the Company, this individual and the legal entity to which it is linked, if applicable, must demonstrate that in their professional activities, they comply with the minimum measures established in section 5.3.1 (Due Diligence) of Chapter X.
- Where there is a group of companies or a declared control situation, the Compliance Officer of the parent company or controlling party may be the same person for all the Companies that make up the group or conglomerate, regardless of the number of Companies that compose it.
- Be domiciled in Colombia.

Compliance Officer's duties

The Compliance Officer shall primarily have the following functions:

1. Along with the legal representative submit the SAGRILAFT draft Manual.
2. Ensure the effective, efficient, and timely operation of the SAGRILAFT System.
3. Submit, at least once a year, reports to the General Shareholders' Meeting. At a minimum, the reports must contain an evaluation and analysis of the efficiency and effectiveness of SAGRILAFT and, if applicable, propose the respective improvements. Likewise, demonstrate the results of the management of the Compliance Officer, and the administration of the Company, in compliance with SAGRILAFT.
4. Once a year, encourage the adoption of corrections and updates to the System, through the presentation of proposals and justifications of the corrections and suggested updates.
5. Coordinate the development of internal training programs.
6. Evaluate the reports presented by the tax auditor's office and adopt the appropriate measures in the face of the reported deficiencies.
7. Certify before the Superintendency of Companies compliance with the provisions of Chapter X of the Basic Legal Notice, as required by this supervisory entity.
8. Ensure the adequate archiving of documentary support and other information related to the management and prevention of ML/TF/FPWMD risk.

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9. Design the ML/TF/FPWMD risk segmentation, identification, measurement, and control methodologies that will be part of the System.
10. Carry out the Suspicious Operations Report (STR) or its absence (AROS) to the UIAF and other reports and reports, under the terms of the ML/TF/FPWMD risk legislation.
11. Promote that the measures adopted for correction, updating, or improvements, when they require authorization from other bodies, be made known to those who are competent.
12. Encourage and verify compliance with the procedures of due diligence and intensified due diligence, applicable to EXPOGANADOS DE COLOMBIA S.A.S.
13. Ask process leaders for information regarding new ML/TF/FPWMD risks they have identified in the course of operations. This information will be made every six months through a letter of new identified risks.
14. Assess the ML/TF/FPWMD risks to which EXPOGANADOS DE COLOMBIA S.A.S is exposed.
15. Register in the SIREL managed by the UIAF.
16. Make the report of the Suspicious Transactions to the UIAF and any other report or report required by the provisions in force, and the terms mentioned in the regulations of the Regulatory Entity.
17. Define and identify red flags and disclose them, indicating that when these signals materialize, they must be reported for analysis and subsequent report to the Compliance Officer.
18. In the event that any property, Asset, Product, fund, or right of ownership in the name or under the administration or control of any country, person, or entity included in these Binding Lists is identified or verified, it must immediately report it to the UIAF through a ROS.

For the fulfillment of the aforementioned responsibilities, it must be endowed with a suitable organizational and budgetary structure and will be empowered with sufficient decision-making power, action, and functional authority, so that the assigned work be executed.

Communication with the Compliance Officer: To facilitate communication of both counterparties, EXPOGANADOS DE COLOMBIA S.A.S., and the State entities, the email oficialc@expoganados.com has been arranged to attend all incoming messages.

Compliance Officer Disabilities and Incompatibilities. No one cannot hold the status of Compliance Officer if incurs in the following:

Ineligibilities.

- Have relatives up to the third degree of consanguinity, second degree of affinity, or first degree of civil relationship about whom there has been a known link with activities or operations related to Money Laundering or the Financing of Terrorism.
- Have a disciplinary, fiscal, or criminal record for crimes related to the membership, promotion, or financing of illegal armed groups, crimes against humanity, or drug trafficking in Colombia or abroad, or that have been included in restrictive lists issued by the Department of State of the United States or by the Security Council of the United Nations, in accordance with the certificates issued by the Office of the Attorney General, the Office of the Comptroller General of the Republic and the National Police, respectively.

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- Has not provided all the necessary information at the time of safety and due diligence studies carried out by the Company at the time of staff recruitment.
- Have been sanctioned by the collegiate body that associates the professionals to their branch.

Incompatibilities:

- Have a vote for the acceptance of suppliers from the company.
- Be an administrator or partner of companies with which the company has some type of business relationship, except for companies of the same business group or that a control situation is exercised.
- Profiles of officials who, due to their work, do not have sufficient independence and management and management capacity will be incompatible with the position.
- The auditor, internal auditor, or administrator shall not be appointed as Compliance Officer.

4.3 Heads of Prevention and Control of SAGRILAFT

To ensure adequate management of ML/TF/FPWMD Risk, the Compliance Officer will appoint SAGRILAFT managers in each of the EXPOGANADOS DE COLOMBIA S.A.S. areas taking into account the nature of the position and not the person who performs the function.

However, all personnel, regardless of their position, role, function, and job title, are responsible for preventing and controlling the materialization of the risks of money laundering, financing of Terrorism, and financing of the proliferation of weapons of mass destruction.

manager of each SAGRILAFT area will be notified of their appointment through a communication signed by the Compliance Officer.

4.3.1 SST and Human Talent Coordination

The person in charge of the position must ensure that the procedures established with respect to the company's current employees and those applicable to the linking of new employees, as well as those linked through temporary service companies, are complied with. In particular, it should:

1. Develop and implement mechanisms aimed at guaranteeing employees' knowledge of SAGRILAFT with due monitoring and reporting to the Compliance Officer of unusual, attempted and suspicious operations.
2. Structure and develop, in coordination with the Compliance Officer, training and education programs on SAGRILAFT.
3. Report to the Compliance Officer cases where situations of violation of SAGRILAFT rules have been found for that of its competence.
4. Request the Compliance Officer to consult restrictive lists at the time of linking and subsequently at least once a year to the company's collaborators.

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5. Likewise, it must report warning signs identified in its process and disclose them to the Compliance Officer when it detects their occurrence.

4.3.2 Coordination of purchases

The person in charge of the position must execute the procedures defined by the Company that ensure due knowledge of the suppliers. In particular, it should:

1. Monitor the conduct of suppliers to detect unusual, attempted, or suspicious operations.
2. Report to the Compliance Officer, unusual situations that may be related to ML/TF/FPADM that arise in relations with the Company's suppliers.
3. Support the strategies defined by the Company aimed at updating supplier information.
4. Refrain from initiating commercial or contractual relationships without prior compliance with the procedures and policies established in this Manual.

4.3.3 Foreign Trade Coordination

The person in charge of the position must execute the procedures defined by the Company ensuring clients' due knowledge. In particular, should:

1. Not allow the transfer of resources to third parties other than those who have negotiated with the Company, and if required must have supporting documents and have general management approval.
2. Monitor customer conduct for unusual, attempted, or suspicious transactions and report to the Compliance Officer for analysis and subsequent reporting.
3. Refrain from initiating commercial or contractual relationships without prior compliance with the procedures and policies established in this Manual.

4.3.4 All participants

EXPOGANADOS DE COLOMBIA S.A.S.; when assigning the functions and powers, it stipulates the rules of conduct that guide the actions of those who have tasks and responsibilities in this matter. This is made clear in the appropriate employee's job descriptions, who will convey these rules to other associates or stakeholders. In any case, in EXPOGANADOS DE COLOMBIA S.A.S., all areas must:

1. Comply with the policies, procedures, and guidelines stipulated by the company to prevent ML/TF/FPWMD risk.
2. Report unusual operations and red flags detected in the course of their activities to the Compliance Officer.
3. Comply with the provisions stipulated in this Manual.
4. Attend ML/TF/FPWMD risk prevention training.
5. (i) Ethical considerations have priority over the achievement of particular goals.

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6. Execute the procedures defined by the Company that ensure the proper integration of publicly and politically exposed persons, obtaining written authorization from the immediate supervisor, as well as the rest of the tasks related to the position.

All employees in the company must consider themselves with responsibilities in SAGRILAFT and maintain a proactive, participatory, leading role in the application of a culture of compliance in terms of ML/TF/FPWMD Risk management. This is essential to be effective, meet the regulator requirements, and minimize the possibility of being a tool or mechanism for these crimes.

4.3.5 Tax Audit

The functions of this body are expressly indicated by law, in particular article 207 of the Commercial Code, which indicates, especially, that related to the obligation to report Suspicious Transactions to the UIAF, when they are warned within the ordinary course of their work, as indicated in numeral 10 of said article. For the purposes of the provisions of paragraph 10 of the aforementioned Article 207, the tax auditor must request a username and password in the SIREL managed by the UIAF, for the sending of the ROS.

In any case, the tax auditor, despite the obligation to keep the professional reserve in everything he knows due to the exercise of his profession, by virtue of the responsibility inherent to his functions and in accordance with the cases in which said reserve can be lifted, has the duty to disclose information when required by law. Thus, for example, when in the course of his work a tax auditor discovers information that leads to the suspicion of possible ML/TF/FPWMD acts, he has the obligation to refer these suspicions to the competent authority.

Among the responsibilities that the Statutory Auditor must consider regarding SAGRILAFT in addition to those provided for in article 207 of the Commercial Code are:

- The operations, businesses, and contracts entered into or fulfilled by EXPOGANADOS DE COLOMBIA S.A.S. must comply with the instructions and policies approved by the highest corporate body, in accordance with Article 207 of the Commercial Code.
- Report in writing to the highest corporate body, the Compliance Officer, on compliance or non-compliance with the provisions contained in the SAGRILAFT.
- Must inform the Compliance Officer of the inconsistencies and shortcomings it detects regarding the implementation of the SAGRILAFT or the established controls.
- Must report on compliance with the SAGRILAFT when requested to do so by any authority.

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Reported Content

The reports to be submitted by the legal representative, the Compliance Officer, or the internal control bodies, as the case may be, must account for the results, analysis, evaluations, and corrections in the implementation, management, progress, compliance, difficulties, and effectiveness achieved through SAGRILAFT. The tax audit may include proposals for improvement when relevant.

CHAPTER V. - SAGRILAFT COMPLIANCE POLICIES

5.1. GENERAL POLICIES

These are the guidelines and guidelines that must be followed by shareholders, managers, collaborators, customers, suppliers, contractors, strategic allies, and other third parties linked to EXPOGANADOS DE COLOMBIA S.A.S., in terms of prevention and control of the risk of money laundering and the financing of terrorism and the financing of the proliferation of weapons of mass destruction. They are as follows:

- a. EXPOGANADOS DE COLOMBIA S.A.S., within the current Colombian legal framework and the international recommendations of the FATF, GAFILAT, and other similar bodies, conducts its efforts to prevent and control the risk of money laundering and the financing of terrorism.
- b. EXPOGANADOS DE COLOMBIA S.A.S., encourages and establishes within its organization, an institutional culture to prevent money laundering and financing of terrorism in its administrative and control bodies, administrators, shareholders, and in general in all its collaborators, customers, suppliers, contractors, strategic allies and other related third parties.
- c. EXPOGANADOS DE COLOMBIA S.A.S., has implemented guidelines for the prevention and resolution of conflicts of interest, which are found in the Manual of the Program of Transparency and Business Ethics Business Ethics and the Code of Ethics and Conduct.
- d. EXPOGANADOS DE COLOMBIA S.A.S., establishes adequate requirements for the linking and carrying out of operations with its customers and suppliers and rejects the establishment or renewal of a contractual relationship that does not comply with the requirements of law and its internal rules.
- e. EXPOGANADOS DE COLOMBIA S.A.S., will negotiate its products and provide its services to customers who have complied with the procedures for linking or updating information established on the prevention and control of the risk of money laundering and terrorist financing.
- f. EXPOGANADOS DE COLOMBIA S.A.S., will not negotiate products and/or services with suppliers that have not complied with the procedures for linking or updating information established on the prevention and control of the risk of money laundering and terrorist financing.
- g. No collaborator is authorized to share, send, supply, issue, forward, inform, disclose by any means of communication any type of information regarding the situation of the SAGRILAFT and EXPOGANADOS DE COLOMBIA S.A.S. counterparties.

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h. All documents that formalize the company's relationship with collaborators, suppliers, customers, and shareholders, must contain clauses in which said parties undertake to help EXPOGANADOS DE COLOMBIA S.A.S., in the prevention of LAFT/FPADM business, regardless of whether the counterparties are obliged by law to have an anti-money laundering system or that they implement it voluntarily.

i. The EXPOGANADOS DE COLOMBIA S.A.S employees, who are directly related to customers and suppliers, must ensure that the established procedures are complied with and provide all the information required according to the products and/or services in question, making sure to document it according to the established guidelines.

j. EXPOGANADOS DE COLOMBIA S.A.S., strictly prohibits the establishment of commercial relations with individual or legal entities that have fictitious names or inaccurate names, as well as operations with individual or legal entities for which the procedure of knowledge has not been provided or the result of said procedure is not satisfactory.

k. EXPOGANADOS DE COLOMBIA S.A.S. monitors the operations of individual or legal entities, national or foreign, who, due to their profile or the functions they perform, may expose EXPOGANADOS DE COLOMBIA S.A.S. to the risk of money laundering and terrorist financing.

l. EXPOGANADOS DE COLOMBIA S.A.S., reserves the information reported to the competent authorities, as well as the information used for the analysis of unusual and suspicious operations.

m. EXPOGANADOS DE COLOMBIA S.A.S., has a sanctions regime that regulates the consequences generated by the breach of the SAGRILAFT by collaborators, managers, and other related third parties.

n. EXPOGANADOS DE COLOMBIA S.A.S., requires its shareholders, collaborators, customers, suppliers, contractors, strategic allies, and other related third parties, to comply with the rules on the management of the risk of money laundering and terrorist financing, these prevailing before the achievement of commercial and financial goals.

o. EXPOGANADOS DE COLOMBIA S.A.S., monitors all operations, businesses, and contracts that have characteristics that qualify them as unusual or abnormal in accordance with the established criteria, for which they are controlled, documented, and reported in the existing formats for these purposes to the Compliance Officer or the corresponding authorities, as appropriate.

p. EXPOGANADOS DE COLOMBIA S.A.S., properly files all records, to maintain their availability and inform shareholders, collaborators, customers, suppliers, contractors, strategic allies, and other related third parties, about the prohibition of disclosing or publishing reports of unusual and suspicious operations.

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q. Shareholders, collaborators, customers, suppliers, contractors, strategic allies, and related third parties related to EXPOGANADOS DE COLOMBIA S.A.S. must commit to EXPOGANADOS DE COLOMBIA S.A.S. to strictly comply with and apply the Transparency and Business Ethics Program and the SAGRILAFT MANUAL.

r. The collaborators: without exception, undertake with EXPOGANADOS DE COLOMBIA S.A.S., to participate in the training programs on the prevention and control of the risk of money laundering and terrorist financing, which will be carried out periodically under the coordination of the Compliance Officer.

s. Shareholders, collaborators, customers, suppliers, contractors, strategic allies, and other related third parties, undertake with EXPOGANADOS DE COLOMBIA S.A.S., to maintain absolute confidentiality regarding the information that is prepared and distributed to the prevention and control of the risk of money laundering and the financing of terrorism and the financing of the proliferation of weapons of mass destruction, unless required by the competent authorities.

t. All employees of EXPOGANADOS DE COLOMBIA S.A.S., must immediately inform the Compliance Officer about unusual, attempted, or consummated operations that come to their knowledge, when their position, role, or function, through the mechanisms used for this purpose.

u. The company adopts and disseminates a Code of Ethics and Conduct and the Code of Good Governance in which the guidelines of behavior that must be followed in a conscious and mandatory manner by persons directly or indirectly linked to the company are indicated and which also refers to the obligations contained in the Internal Work Regulations. This Code provides for the expected conduct of employees and stakeholders in the face of situations derived from the ML/TF/FPWMD, whose duty is to put the observance of these ethical principles before the achievement of business goals.

5.2. LA/TF/FPADM RISK POLICY.

EXPOGANADOS DE COLOMBIA S.A.S. establishes the segmentation of risk factors for counterparties, products, and jurisdiction; identifies the risks and causes associated with Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction such as the legal risk, contagion risk, reputational risk and operational risks through the LAFT/FPADM company Risk Matrix which can be developed with technological tools that facilitate this work.

The ML/TF/FPADM self-control and risk management system must ensure that the company adopts the necessary mechanisms to reduce the possibility that the operations, businesses, and contracts that have been carried out or are intended to be carried out, are used to give the appearance of legality to money laundering activities or to finance terrorism.

Likewise, the control involves the detection of transactions that do not conform to the normality of the business and the corresponding analysis to determine if they are possible suspicious transactions.

The procedures that are implemented for the control of ML/TF/FPWMD risk must be taken into account, as a minimum, the query in the search engines that the company contracts with private entities or in its absence, in the following free platforms:

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OFAC Lists

<http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

UNSC – United Nations Security Council

http://www.un.org/spanish/sc/committees/list_compend.shtml

Additionally, the following lists can be consulted.

When the situation so warrants and due to the characteristics of the counterparty, the following consultation tools will be taken into account to minimize the risk and verify an adequate knowledge of the client; pages that will be available to the people responsible for the knowledge of the client in the SAGRILAFT Compliance Unit.

General Prosecutor Office.

<http://siri.procuraduria.gov.co:8086/certWEB/Certificado.aspx?TPO>

DEA Most Wanted

[DEA Most Wanted](#)

Interpol Most Wanted

<http://www.interpol.int/notice/search/wanted>

FBI Most Wanted

The Compliance Officer, based on the positive cases contained in the aforementioned report, will take the corresponding actions in order to prevent them from carrying out operations or relations with the company, leaving supporting evidence.

Additionally, to verify the identity of nationals and to minimize fraud by impersonation, some the following tools will be used:

Comprehensive Social Welfare data system

<http://ruafsvr2.sispro.gov.co/RUAF/Cliente/WebPublico/Consultas/D04AfiliacionesPersonaRUAF.aspx>

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EXPOGANADOS DE COLOMBIA S.A.S. measures the impact and probability of occurrence of ML/TF/FPWMD risks documented in the identification stage, in order to determine the inherent risk, in accordance with the guidelines defined by the organization.

EXPOGANADOS DE COLOMBIA S.A.S. establishes due diligence procedures, intensified due diligence, and policies to control the inherent risk of ML/TF/FPWMD according to the result of the evaluation and measurement stage.

SAGRILAFT identifies and manages EXPOGANADOS DE COLOMBIA S.A.S LA/FT/FPADM risks with the premise that the greater the risk, the greater the control. EXPOGANADOS DE COLOMBIA S.A.S. risks include the analysis of the size and general composition of the economic sector where it is located.

As a result of this stage, the entity establishes the residual risk of ML/TF/FPWMD. The control must reduce the possibility of occurrence and/or the impact of ML/TF/FPWMD risk if it materializes.

5.3. THIRD-PARTY DUE DILIGENCE POLICY

Due diligence refers to the efforts made by EXPOGANADOS DE COLOMBIA S.A.S., to know the counterparties. The activities to carry out this due diligence are described in the "Due Diligence Policy". However, EXPOGANADOS DE COLOMBIA S.A.S. will adopt reasonable measures of Due Diligence of its counterparties with a risk-based approach and its materiality.

5.4. ENHANCED DUE DILIGENCE CONCEPT

EXPOGANADOS DE COLOMBIA S.A.S. applies Intensified Due Diligence, for an advanced knowledge of the Counterparty and the origin of the assets that are received, for those that represent a greater risk such as PEPs, those located in non-cooperating countries and high-risk jurisdictions according to the FATF and those that carry out activities with Virtual Assets or are intermediaries of it. For counterparties qualified as Politically Exposed Persons mentioned in Decree 830 of 2021, national or foreign, the approval of the General Manager must be obtained for the binding or to continue with the contractual relationship, attending to the requirements mentioned in Decree 830 of 2021.

5.5. CASH TRANSACTION MANAGEMENT POLICY.

In order to prevent ML/TF risk in EXPOGANADOS DE COLOMBIA S.A.S., its internal policy is not to pay in cash or receive in cash payment for transactions made with suppliers and customers. However, for the payment of minor expenses that must be paid quickly and are urgent, it is approved to pay in cash through petty cash the company has for the administrative area and the operational area. The handling of petty cash has its policy and is strictly complied with by those responsible. The amount and those responsible for the petty cash are defined and approved by the Administrative Management each year, which will be established in an internal administrative record.

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5.6. ALERT SIGNAL IDENTIFICATION POLICIES, ANALYSIS OF UNUSUAL AND ATTEMPTED OPERATIONS AND REPORTING OF SUSPICIOUS OPERATIONS RSO.

In order to detect operations that have departed from the defined parameters identified as warning signs, EXPOGANADOS DE COLOMBIA S.A.S. establishes procedures for each of the organization processes where the counterparties intervene.

As a result of the identification or detection process, all unusual and/or suspicious transactions and attempted transactions must be reported to the Compliance Officer who, in accordance with current regulations, makes the report to the Financial Information and Analysis Unit - UIAF.

All EXPOGANADOS DE COLOMBIA S.A.S. employees are obliged to report to the Compliance Officer any warning sign, fact, or unusual situation or generate suspicion that suggests that there may be an attempt to launder money or finance terrorism or financing of weapons of mass destruction, through the company, which will be evaluated in its entirety.

5.7. CONFLICT OF INTEREST RESOLUTION POLICY

If any of the EXPOGANADOS DE COLOMBIA S.A.S. employees face conflicts of interest related to ML/TF/FPWMD risk analysis and decisions, they must inform their immediate superior and the Compliance Officer, who will evaluate the situation together so that the relevant decisions are made.

Within the scheme of best risk management practices, focused on boosting the productivity and efficiency of operational processes, in situations where it must be decided immediately or without due registration of what is stipulated in this Manual, the situation and the counterparties involved will be evaluated, in the context of the particular characteristics based on the level of ML/TF/FPWMD risk, transactionality, geographical location, type of products they handle.

5.8. TRAINING AND INFORMATION DISSEMINATION POLICY.

The implementation of the SAGRILAFT maintains the design, approval, monitoring, dissemination, and training procedures included in the Manual, which represents a rule of conduct that guides the action of EXPOGANADOS DE COLOMBIA S.A.S., its employees, shareholders, coordinators, and other related or interested parties.

The SAGRILAFT will be disclosed within EXPOGANADOS DE COLOMBIA S.A.S. and to other interested parties, at least once (1) a year, to ensure adequate compliance.

EXPOGANADOS DE COLOMBIA S.A.S. will provide training to collaborators, shareholders, and, in general, to all interested parties who consider that they should know the SAGRILAFT. These trainings will be evaluated individually to measure the understanding of the subject and will take place at least one (1)

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once a year, recording its completion, as well as the names of the attendees, the date, and the matters discussed.

As a result of this outreach and training, all stakeholders will be able to identify what is an Unusual Operation or what is a Suspicious Operation.

5.9. RESPONSE TO AUTHORITIES POLICY

EXPOGANADOS DE COLOMBIA S.A.S. has all the availability to collaborate with government entities that require information related to LAFT/FPADM for which it has a procedure to respond in a timely manner to the information requirements related to the implementation and progress of the SAGRILAFT system for the prevention and control of ML/TF/FPADM risk carried out by the supervisory or control entities.

5.10. SAGRILAFT DOCUMENT MANAGEMENT POLICY

In order to collaborate with the competent and control authorities, the supporting documentation of SAGRILAFT must be kept, as well as that related to the linking of collaborators, customers, and/or suppliers, that which supports the transactions carried out, and that which served to determine an operation as unusual or suspicious.

Documents and records relating to compliance with the rules on the prevention and control of the risk of money laundering and terrorist financing must be kept for a minimum term of ten (10) years through physical or electronic means. At the end of this period, they may be destroyed, provided that the following conditions are met: i. There is no request for delivery of these formulated by the competent authority. ii. They are kept in a technical medium that guarantees their later exact reproduction and the preservation of their probative value, in accordance with the provisions of Decrees 2527 of 1950, 3354 of 1954 and 2620 of 1993 and article 12 of Law 527 of 1999.

All documentation and information must be managed by the Compliance Officer. The information and support documents sent to the UIAF are handled with the strictest confidentiality, and for no reason will internal and external clients have access to and knowledge of it.

5.11. POLICY FOR INTERNAL CONTROL BODIES

EXPOGANADOS DE COLOMBIA S.A.S., states that it has stipulated in the framework of SAGRILAFT, general powers to those who will be responsible for carrying out an evaluation of the compliance and effectiveness of SAGRILAFT. EXPOGANADOS DE COLOMBIA S.A.S., allows and encourages bodies such as the tax audit office to participate in the effectiveness and compliance review of the SAGRILAFT whose reports with the findings and recommendations must be informed to the General Shareholders' Meeting, the legal representative and the Compliance Officer so that the corresponding analyses are carried out and the necessary corrections are adopted.

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CHAPTER VI. – LA/FT/FPADM SELF-CONTROL AND RISK MANAGEMENT SYSTEM

Taking into account the obligation issued by External Circulars 100-000016 of December 24, 2020, and 100-000004 of April 2021 of the Super societies to implement adequate self-control and comprehensive risk management of ML/TF/FPWMD; EXPOGANADOS DE COLOMBIA S.A.S., a company in the real sector and supervised by the Superintendence of Companies, and that meets the requirement for the amount of gross income established in paragraph 4.1 of the aforementioned circular, it must implement efficient prevention and control measures.

Taking into account the above, risk analysis of the ML/TF/FPWMD must be made and accordingly, do an appropriate risk management in terms of ML/TF/FPWMD. Whatever the adopted risk management system is, it must be adjusted to the company's own risk and materiality taking into account its corporate purpose, size, operation, economic activity, geographical area where it operates, form of marketing, and other particular characteristics. Self-control and risk management will include all procedures and tools that tend to protect the company, its administrators, and employees from engaging in ML/TF/FPWMD practices. For this purpose, it must have an ML/TF/FPWMD Risk Matrix or other equivalent mechanism for assessing ML/TF/FPWMD Risk that allows its evolution to be measured and audited.

6.1 METHODOLOGIES FOR THE IDENTIFICATION OF ML/TF/FPWMD RISK AND ITS ASSOCIATED RISKS

For the identification of the risk EXPOGANADOS DE COLOMBIA S.A.S. used the methodology established in its model for obtaining a risk matrix that is compatible with the nature of the ML/TF/FPWMD risk and is part of this Manual.

The objective of this stage is to generate an exhaustive list of risks based on those events that could create, increase, prevent, degrade, accelerate, or delay the achievement of the objectives that the company has set.

In compliance with the above, EXPOGANADOS DE COLOMBIA S.A.S. will identify specific and easy-to-manage ML/TF/FPWMD risk events by risk factor, which are part of the general risk of money laundering and the financing of terrorism.

According to the methodology adopted, tools and techniques for risk identification that are appropriate to their objectives and capabilities must be applied, as well as to the risks they may face. Relevant and up-to-date information is important to identify risks. This information should include, whenever possible, basic information. People with the appropriate knowledge should be involved in identifying the risk.

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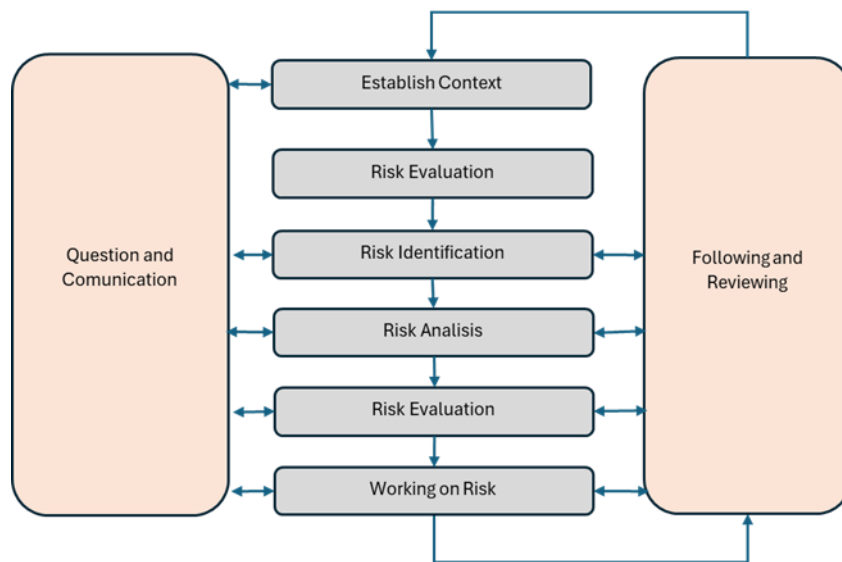


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The LAFT risk management policy should be relevant to the strategic context of the organization, its goals, objectives, and nature.

The company General Manager must ensure that its policy is understood, implemented, and maintained by all areas of the company.

The Self-Control and Risk Management System LA/FT/FPADM becomes an EXPOGANADOS DE COLOMBIA S.A.S. fundamental part of the administrative process, this administration requires certain steps that are shown in the following chart:



6.2 THE SAGRILAFT MUST IDENTIFY AND MANAGE THE LA/FT/FPADM RISKS OF EACH OBLIGATED COMPANY, WITH THE PREMISE THAT THE GREATER THE RISK, THE GREATER THE CONTROL, DESIGN AND APPROVAL OF THE LA/FT/FPADM RISK SELF-CONTROL AND MANAGEMENT SYSTEM

Implement a methodology that allows EXPOGANADOS DE COLOMBIA S.A.S. to comply with current local, national, and international regulations, through the management of risks related to ML/TF/FPWMD, with preventive and/or corrective actions for the effective control of the identified risks.

6.2.1. Methodology for risk identification

Risk identification is one of the most important stages in the risk management system. This stage seeks to identify the risks to be managed, broad-based identification is critical in using

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a well-structured systematic process, because potential risks that are not identified at this stage are excluded from further analysis.

The identification of risks must include all aspects of the risks, whether or not they are under the control of the organization.

Through this stage, EXPOGANADOS DE COLOMBIA S.A.S. will be able to identify the risks of LAFT inherent to the development of its activity, taking into account, at least, the following risk factors:

- ❖ Counterpart
- ❖ Products
- ❖ Distribution Channels
- ❖ Jurisdictions

The risk identification stage must be documented by the Compliance Officer, once the areas of the company send him the list of risks they have identified.

The results of this stage must also be presented to the members of the General Shareholders' Meeting in the various reports.

The identification stage consists of four elements:

- a) Establishing the methodology for the segmentation of ML/TF/FPWMD risk factors.
- b) The risk factors
- c) Establish methodologies for the Identification of the risk and the associated risks to which they are exposed in relation to ML/TF/FPWMD risk, for each of the defined segments.
- d) Based on the methodologies established in the development of the previous paragraph, identify the ways through which the ML/TF/FPWMD risk can be presented.

To identify ML/TF/FPWMD risks, industry and company experience will be taken. This technique is based on expert judgments, on the typologies and warning signs of ML/TF/FPWMD, which have been published by international groups and organizations specialized in the prevention of ML/TF/FPWMD, on documents issued by the financial analysis units and on the company's own experience.

This technique may be combined or supplemented with the following additional techniques:

- ❖ Event Inventory Technique.
- ❖ Process flow analysis.
- ❖ Interactive work workshops.
- ❖ Interviews.
- ❖ Checklists
- ❖ Judgments based on expert experience and records.
- ❖ Brainstorm

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The objective of this stage is to generate an exhaustive list of risks based on those events that could create, increase, prevent, degrade, accelerate, or delay the achievement of those identified for the company.

Methodology:

It should be established according to the following questions:

What could this Happen?

The purpose is to generate an exhaustive list of risk factors and events that could have an impact on the achievement of each of the strategic business or project objectives.

Where could this happen?

It refers to the areas, processes, and locations where the loss event can materialize due to the conditions in which the activity or element is managed.

Why and how could this Happen?

Having identified what could happen, it is necessary to identify possible causes and scenarios. They correspond to many ways in which an event can occur. It is important that no significant causes are omitted.

These risk components should not be confusing and should ideally be identified separately.

Indicates if the situation corresponds to a failure, omission, inconsistency error or opportunity.

These events could impede, degrade, delay, or enhance the achievement of those goals. They can be considered in more detail to identify what may happen.

6.2.1.1 Segmentation of risk factors

6.2.1.1.1 Methodology for the Segmentation of LAFT Risk Sources

For the segmentation of risk sources, the following aspects are taken into account:

6.2.1.1.2 Segmentation Concept

It is the process by means of which the separation of a great number of elements into homogeneous groups within and heterogeneous among them is carried out. The separation is based on the recognition of significant differences in their characteristics, known as segmentation variables, in such a way that they can be described and analyzed according to their particular characteristics.

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- **Segmentation Benefits**

- a. Isolate segments that are more vulnerable to the presence of TFL risks in order to exercise greater control and supervision.
- b. Develop control and supervision points taking into account the characteristics of the segment.
- c. Know the segments in which the controls are effective and have a lower incidence in the LAFT.

- **Definition Of Segmentation Variables**

For this purpose, different variables associated with each of the risk sources, described in this SAGRILAFT Manual, are established.

- **Classified Risk Event**

According to the identified risk sources and the segmentation criteria determined for the analysis, risk events are identified and classified, taking into account the following considerations on the warning signs of the sector.

1. Alert Sign Definition:

Warning signs or early warnings are all those facts, situations, events, amounts, quantitative and qualitative indicators, financial reasons, and other information that is determined to be relevant, from which the possible existence of a fact or situation that escapes what is determined as normal or particular circumstances that attract attention and justify further analysis can be inferred in a timely manner.

Unlike unusual transactions, they are those that 1) are not related to economic activity or fall outside the additional parameters set by the entity and, 2) for which the entity has not found an explanation or justification that is considered reasonable.

In the same sense, the standard establishes that the determination of suspicious transactions results from the confrontation of operations detected as unusual with the information of customers, suppliers, human resources, or users, in accordance with the objective reasons established by EXPOGANADOS DE COLOMBIA S.A.S.

The segmentation of risk factors is a strategy for the prevention of money laundering and terrorist financing that consists of dividing each risk factor customers, suppliers, human resources and collaborators or business partners into a series of homogeneous groups or segments with respect to one or more variables, through different statistical procedures, in order to be able to apply specific controls that allow the associated risks to be prevented and detected more effectively.

In general terms, segments could be created based on the distribution of customers, suppliers, human resources and collaborators or business partners, however, by the business considerations, and the number of risk factors, the organization considers that it will not perform the segmentation and the LAFT review work will be performed for all those involved with the organization.

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To comply with the above within our market segmentation, it was defined, taking into account those sectors of the economy that could expose the company to the greatest degree to ML/TF/FPWMD risk, as follows:

- › A sector of livestock traders and activities related to the agricultural sector.
- › Livestock transportation.
- › Politically Exposed Persons (PEP)
- › Companies located in non-cooperative countries with low or no taxation.
- › Non-profit Organizations.
- › Foundation, ONG.

6.2.2 Methodology for the assessment and measurement of ML/TF/ATF/MFATF risks.

Once the identification stage has been completed, through the ML/TF/FPWMD Risk Matrix we can measure the possibility or probability of occurrence of the inherent risk of ML/TF/FPWMD, against each of the risk factors, as well as the impact in case of materialization through the associated risks. These measurements, the character, and the criteria, have been discretionary, placing the risk as "High", "Medium", "Low" and "Inferior".

To qualify these risks, the values and criteria established in the following chart are taken into account:

Risk Level	Treatment	Equiv
High risk	Needs attention from senior management	
Medium Risk	and requires Responsibility to be	
Low risk	specified	
Risk I		

The ML/TF/FPWMD Risk Matrix, designed within the framework of compliance with the ML/TF/FPWMD Risk Management System, also allows measuring the possibility or probability of occurrence of the residual risk, as well as the impact of the risk associated with the controlled activity, if the latter materializes, against each of the ML/TF/FPWMD risk factors.

The methodology to determine the possibility or probability that potential risk events will materialize uses qualitative or quantitative measurements, and the criteria or categories: "Very High", "High", "Medium", "Low" and "Inferior". It includes individual and consolidated ML/TF/FPWMD Risk measurements or assessments against each of the ML/TF/FPWMD Risk Factors and the specific risks that were identified.

To qualify the probability of risk occurrence, the values and criteria established in the following chart are taken into account:

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PROBABILITY OF ML/TF/FPADM/ C/ST RISK			
DESCRIPTION	1 DEFINITION	GRADE	RANGE
Very High	It is expected that the risk occurs in most circumstances.	5	81% to 99%
High	Probably the risk will occur in most circumstances.	4	61% to 80%
Media	May occur	3	41% to 60%
Low	It could happen sometime	2	At 40%
Lower	It can happen only in exceptional circumstances	1	0% to 20%

To qualify the risk impact, the values and criteria established in the following chart are taken into account:

IMPACT OF ML/TF/FPWMD RISK			
DESCRIPTION	1. DEFINITION	GRADE	RANGE
Major	Losses that generate loss of production capacity with harmful effects	5	81% to 99%
High	Extensive losses that generate loss in capacity of production without harmful effects	4	61% to 80%
Moderate	Damages that are contained locally and with external assistance.	3	41% to 60%
Lower	Few damages that are contained locally and immediately	2	At 40%
Insignificant	Does not cause significant harm	1	0% to 20%

The methodology also stipulates determining the impact caused by the materialization of the risk, which translates into the effects or damages generated, establishing categories such as "Major", "High", "Moderate"; "Minor" and "Insignificant". It includes individual and consolidated ML/TF/FPWMD Risk measurements or assessments against each of the ML/TF/FPWMD Risk Factors and the specific risks that were identified.

The methodology for qualifying these risks is shown below, taking into account the values and criteria established in the following chart:
 Measurement of impact and risk

LA/FT/FPADM AND C/ST RISK MAP						
PROBABILITY	5	10	15	20	25	
	4	8	12	16	20	
	3	6	9	12	15	
	2	4	6	8	10	
	1	2	3	4	5	
						IMPACT

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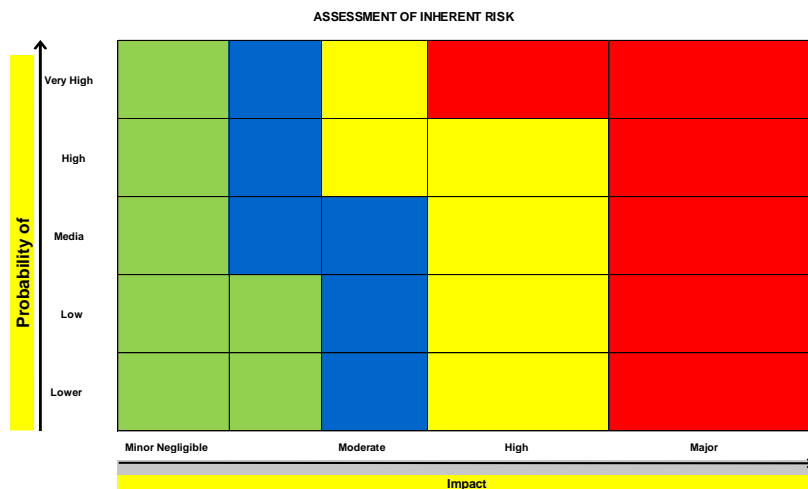
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Risk impact and probability Comparison:

MEASUREMENT OF ML/TF/FPWMD AND C/ST RISK					
PROBABILITY			IMPACT		
DESCRIPTION	GRADE	RANGE	DESCRIPTION	GRADE	RANGE
Very High	5	81% to 99%	Major	5	81% to 99%
High	4	61% to 80%	High	4	61% to 80%
Media	3	41% to 60%	Moderate	3	41% to 60%
Low	2	At 40%	Lower	2	At 40%
Lower	1	0% to 20%	Insignificant	1	0% to 20%

It is considered to evaluate the ML/TF/FPWMD Risk before the launch of any product, the modification of its characteristics, the incursion into a new market, the opening of operations in new jurisdictions, the use of new technologies, and the launch or modification of distribution channels.

As a result of this stage, the inherent risk profile of the aggregated measurements in each ML/TF/FPWMD Risk Factor and its associated risks is identified or determined.



The Compliance Officer will periodically measure the risk of LAFT taking into account the procedure described above.

6.2.3 Methodology for the control stage

At this stage, the measures conducive to controlling the inherent risk to which EXPOGANADOS DE COLOMBIA S.A.S. is exposed are adopted, due to the risk factors and the associated risks, that is, the most appropriate control measures have been adopted and their application to the ML/TF/FPWDM Risk Factors identified to control the inherent risk.

The ML/TF/FPWMD risk control measures applied on each of the Risk Factors

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ML/TF/FPWMD and the associated risks are recorded in the ML/TF/FPWMD Risk Matrix and are established according to the level of exposure of the ML/TF/FPWMD Risk based on the rating given to each of the risk factors in the measurement stage.

The control mechanisms include tools for the detection of warning signs and unusual operations, as well as determining suspicious operations based on the ML/TF/FPWMD Risks identified in the classification, segmentation and individualization of the ML/TF/FPWMD Risk Factors.

Both preventive and detecting controls have been implemented, taking into account that the greater the risk, the greater the control, in order to obtain a decrease in the possibility or probability of ML/TF/FPWMD Risk occurrence or the impact if it materializes.

As a result of this stage, the application of the respective controls, and the residual risk profile (level resulting from the risk after applying the controls) of ML/TF/FPWMD is established.

In the control stage, a list of controls was determined that will help minimize ML/TF/FPWMD risks. The list of controls consists of the procedures or tools used to minimize the materialization of any of the risks (preventive) or failing to correct them (corrective). These are:

1. Know the counterpart (Demographic, socio-economic information, and references)
2. Verify data (interviews, calls, risk centers).
3. Request support from the data provided in the linking form.
4. Have a clear and appropriate procedure to follow with client documents.
5. Verify lists and cross-reference databases in the system that the company acquired – BIG DATA MULTIBURO or in some other that it contracts.
7. Check the international customer operations lists each time the company generates a new one.
8. Have an information system that allows the generation alerts based on the quotas assigned to customers, record and classify risk categories in the BPM given to the counterparty.
9. Reporting transactions to the UIAF
10. Terminate a contractual relationship and report to the authorities, taking into account the recommendations of the Compliance Officer.

6.2.4 Methodology for the monitoring stage

This stage allows monitoring, and surveillance, with respect to the risk profile and, in general, allows the timely detection of SAGRILAFT deficiencies, as well as carrying out the detection of unusual and/or suspicious operations. The effectiveness and compliance with the policies and procedures implemented to mitigate the occurrence of ML/TF/FPWMD risk are evaluated at least every six months.

The purposes established for this stage are detailed below:

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- Carry out comparisons on the inherent risk evolution against the residual risk of each risk factor and the associated risks.
- Prepare reports on the effectiveness of the controls implemented and the evolution of EXPOGANADOS DE COLOMBIA S.A.S risks, ensuring the understanding and timely operation of said controls.
- Facilitate the detection and correction of deficiencies in the SAGRILAFT stages.
- Set up descriptive and/or prospective indicators that reveal potential sources of ML/FT risk.

Risk monitoring seeks to evaluate the evolution of EXPOGANADOS DE COLOMBIA SAS risk profile, both inherent and residual, and its variation, in a consolidated manner and discriminated by risk factor and associated risk. For this, an annual periodicity has been determined in which the grades will be monitored. According to the results obtained, action or improvement plans will be determined to maintain and stabilize the residual risk as acceptable.

The monitoring of the SAGRILAFT will be given by the following elements among others:

- Monitoring and periodically updating the risk matrix and established controls at least every year: The duty of the Compliance Officer and his team to review and update based on the behavior of the counterparty, the segmentation carried out, as well as the associated risk factors are established.
- Implementation of a technological tool, which will allow feeding the information about the segmentation carried out by EXPOGANADOS DE COLOMBIA S.A.S. With this information, the level of risk in which it is exposed will be analyzed and it will be possible to determine if the controls implemented have been sufficient or not.
- By determining unusual and/or suspicious transactions and implementing its internal reports.
- Special follow-up to that counterparty that is in risk areas according to the matrices established by EXPOGANADOS DE COLOMBIA S.A.S. This can be given, by special financial studies, periodic visits established to the counterparty, control of expiration of operations and compliance, among others.

It will be based on:

- ❖ Compare the inherent and residual risks of each risk factor and the associated risks.
- ❖ Ensure controls to embrace all risks so that they are functioning in an effective, efficient, and timely manner.
- ❖ Ensure that residual risks are at acceptance levels established by the entity.
- ❖ Compare the evolution of the inherent risk profile with the residual risk profile of ML/TF/FPWMD.
- ❖ Determine unusual and suspicious transactions, and on the latter, proceed with their report to the Special Administrative Unit for Financial Information and Analysis – UIAF.

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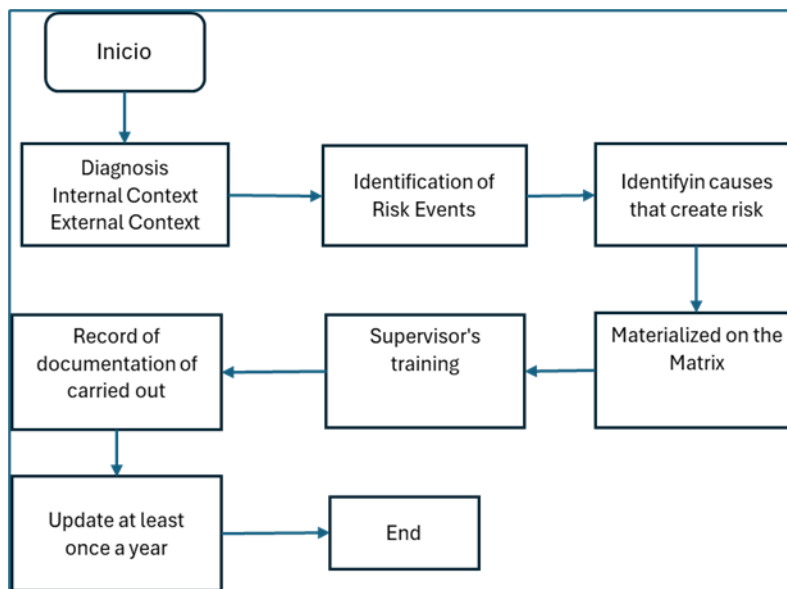


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6.2.5 Risk Matrix

The ML/TF/FPWMD Risk Matrix will be the document that will evidence the process of determining the context, identifying, measuring, evaluating, monitoring, and communicating the risks to the interested parties and controlling the threats. Ensures that the most significant risks are identified for monitoring and management. The ultimate goal is to strengthen the implementation and development of risk management practices in EXPOGANADOS DE COLOMBIA S.A.S., through the adequate treatment of management risks, and controlling situations that may impact the fulfillment of the mission and objectives of the Company.

The update of the risk matrix must be carried out at least once a year with the help of all areas of the company and shared by the compliance officer with the General Shareholders' Meeting.



The SAGRILAFT Risk Matrix is integrated with the Transnational Corruption and Bribery - C/ST risks that make up the Transparency and Business Ethics Program of the company.

6.3 IMPLEMENTATION

Within the execution of the SAGRILAFT, adopted by the company, the Legal Representative will have the duty to enforce the policy and instructions on the prevention and control of ML/TF/FPWMD that are approved. Likewise, it will provide the technological, human, and physical resources necessary for the implementation of the system and will meet the requirements or recommendations made by the control body, associates, and directives, for adequate compliance.

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6.4 SAGRILAFT AUDIT AND COMPLIANCE

In compliance with the provisions of the Basic Legal Notice, EXPOGANADOS DE COLOMBIA S.A.S. assigned a person responsible for the audit and verification of compliance with SAGRILAFT, named the Compliance Officer.

To avoid the suspension of the activities by the Chief Compliance Officer, the Company will evaluate and, if applicable, appoint an alternate Compliance Officer.

The GENERAL ASSEMBLY OF SHAREHOLDERS must make this designation and the legal representative of EXPOGANADOS DE COLOMBIA S.A.S. will propose the person who will occupy the function of Compliance Officer, for the designation by the highest corporate body.

The Company must certify that the Compliance Officer complies with the requirements of this Chapter X and must inform the Superintendency of Companies in writing, addressed to the Delegation of Economic and Corporate Affairs, within fifteen (15) business days following the appointment, the name, identification number, email and telephone number of the main and alternate Compliance Officer (where appropriate), or in accordance with the specific instructions determined by the Superintendency of Companies.

With the certification indicated in the previous paragraph, you must send the curriculum vitae of the Compliance Officer, a copy of the document that accounts for the registration of the Compliance Officer before the Sirel administered by the UIAF, and a copy of the extract from the minutes of the GENERAL SHAREHOLDERS' meeting or highest corporate body in which your appointment is recorded.

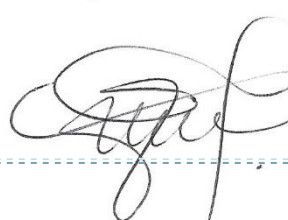
The same procedure must be carried out when the change of Compliance Officer occurs.

The Compliance Officer must have a professional degree and accredit minimum experience of six (6) months in the performance of similar positions or aimed at the administration and management of ML/TF risks, additionally, accredit knowledge in the management of ML/TF Risk or ML/TF Risk/FPADM through specialization, courses, diplomas, seminars, congresses or any other similar, including but not limited to any training program that is or will be offered by the UIAF to the actors of the national anti-money laundering and anti-financing of terrorism system.

The Company, its legal representative and the Assembly must have the operational, economic, physical, technological, and resource measures necessary for the implementation of the SAGRILAFT and the proper development of the audit and compliance work. SAGRILAFT must include sanctions or consequences for employees, managers, associates, or third parties, for non-compliance or non-observance of its provisions.

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6.5 REPORTS AND MONITORING

For adequate EXPOGANADOS DE COLOMBIA S.A.S., SAGRILAFT monitoring, the management appointed a person to be in charge of this matter and who will assume the functions of SAGRILAFT Compliance Officer within the company, responsible for the execution and monitoring of the self-control and risk management system LA/FT/FPADM.

6.5.1 Internal Reports

Based on the third-party knowledge policies, any worker must be able to report facts that contravene the policies and imply an unusual situation, for this, they must send an email to the Compliance Officer, attaching the support documents to the operation and a clear explanation on the unusual suspicion.

Once this information is received, the Compliance Officer carries out the pertinent investigation, based on the supporting documentation, and determines whether it is indeed an unusual operation or is a STR to proceed with its respective report to the UIAF.

❖ **Reports to the Shareholders' Meeting and the General Management:** The Compliance Officer must submit at least twice a year a report to the General Shareholders' Meeting and to the General Management, which must contain at least:

- Profit/Loss of Management
- Evaluation and analysis of the efficiency and effectiveness of the ML/TF/FPWMD risk management system
- The compliance that has been given with the sending of reports to the different authorities.
- The status of implementation of controls contemplated in the treatment plans resulting from the ML/TF/FPWMD risk assessment.
- The effectiveness of the mechanisms and instruments established to correct the failures of the ML/TF/FPWMD risk management system.
- Summary of the requirements and responses given to control entities.
- Critical and moderate ML/TF/FPWMD alerts.

6.5.2. External Reports

In accordance with existing regulations, EXPOGANADOS DE COLOMBIA S.A.S adopts the following policies as per the requirements of the authorities:

6.5.2.1 Information requirements from authorities:

The responses to the information requirements in ML/TF/FPADM processes made to EXPOGANADOS DE COLOMBIA S.A.S. by the different competent authorities will be attended to by the Compliance Officer.

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When the response requires attaching supporting documents, copies will be attached.

The Compliance Officer must evaluate the type of response and the documents sent to the requesting entities. In the case of those controlling entities such as the Dian, the UIAF, and the Prosecutor's Office, per its discretion, all the information necessary for the controlling entity may be released.

6.5.2.2 Reports to the UIAF

If there is knowledge of a suspicious transaction or an attempted transaction, it should immediately be reported as a STR directly to the UIAF in accordance with the instructions indicated by the Financial Information and Analysis Unit (UIAF), which can be consulted on the website www.uiaf.gov.co. "Immediate should be understood as the moment from which the company decides to classify the operation as attempted or suspicious. For this purpose, the company doesn't need to be certain that it is a criminal activity to identify the criminal type or to verify that the resources have an illicit origin; it is only required that the operation be suspicious in the terms defined in this notice".

ROS:

The sending of a ROS report to the UIAF does not constitute a complaint nor does it give rise to any type of responsibility for the reporting company or for the people who have participated in its detection or report. The support of the reported operation, as well as the information of transaction records and client knowledge of documents, must be organized and kept for at least five (5) years since they can be requested by the competent authorities.

No Company personnel may disclose that a suspicious transaction has been reported to the UIAF, as determined by the fourth paragraph of article 11 of Law 526 of 1999.

EXPOGANADOS DE COLOMBIA S.A.S., reports to the UIAF all Suspicious Transactions that it detects in the ordinary course of its business or activities. Once a Suspicious Operation has been identified and analyzed, the following activities are carried out:

- ❖ The Compliance Officer enters the SIREL managed by the UIAF.
- ❖ Properly document the investigation that defines the reported operation as suspicious, leaving at least a report outlining the following:
 - a) Counterparty Identification (full name and identification number)
 - b) Brief description of the atypical or abnormal event, situation, or event
 - c) Analysis of the atypical or abnormal fact, situation, or event, and presentation of the result, conclusions, and/or recommendations
 - d) Documentation or support that reveals, or evidence of the atypical or abnormal fact, situation, or event and the relationship with the Counterparty
- ❖ Keep the supports that led to the classification of the suspicious operation, in accordance with the provisions of article 28 of Law 962 of 2005, or the regulation that modifies or replaces it, related to the conservation of books and commercial papers.

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- ❖ Make the report immediately, through the SIREL, in accordance with the instructions indicated by the UIAF in the SIREL User Manual.
- ❖ Consult the SIREL User Manual to know how the transaction report is made (website www.uiaf.gov.co), as well as changes and/or updates.
- ❖ The Compliance Officer guarantees the reservation of the report of a Suspicious Transaction sent to the UIAF, as provided for in Law 526 of 1999 and other regulations that add, modify or replace them.

EXPOGANADOS DE COLOMBIA S.A.S. knows that the presentation of a Suspicious Operation Report does not exempt the Company or its administrators from the obligation to report, when applicable.

AROS:

In the event that a quarterly period elapses without the Obligated Company carrying out a ROS, the Compliance Officer, within ten (10) calendar days following the expiration of the respective quarter, must submit a report of absence of ROS or AROS through SIREL, in the form and terms that correspond, in accordance with the instructions of that platform.

REPORT 75:

Concerning the obligation to comply with the provisions of Chapter X of the Basic Legal Notice of this Superintendency, with the completion of the report called "**Report 75 – SAGRILAFT and PTEE**". This report is mandatory and it is filled out with full responsibility, commitment, and transparency by EXPOGANADOS DE COLOMBIA S.A.S.

6.6 COMPLIANCE

The General Shareholders' Meeting shall require the legal representative to comply with the self-control and comprehensive risk management system LA/FT/FPADM.

Within our Self-Control and Comprehensive Risk Management System LA/FT/FPADM it is established that, if there is no compliance with what is adopted within our SAGRILAFT, the company's employees may be sanctioned under the provisions of the company's Internal Work Regulations to guarantee compliance with the aforementioned system.

6.7 OUTREACH AND COMMUNICATION.

All the policies and procedures adopted for the implementation of the self-control and comprehensive risk management system LA/FT/FPADM are known to our employees and other interested parties who are contacted by the Compliance Officer, the same with the documents considered as internal documents managed by the company will be available to be consulted for a SAGRILAFT matter.

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EXPOGANADOS DE COLOMBIA S.A.S. for the disclosure to the public of information on the management of the risk of money laundering and terrorist financing will be through its website or other public dissemination mechanisms.

6.8 TRAINING

The Company's Compliance Officer will carry out training on the subject, this training may be face-to-face or non-face using all the appropriate technological tools to be able to give appropriate training.

6.8.1 SAGRILAFT Training Policy

Within the employee training policies, the approval of the design of an Annual Training Program is established, which will oversee the Compliance Officer and will be monitored by the Human Talent and OSH Area, both for its managers, coordinators, and collaborators. For these purposes, any new employee who enters our company must be induced, trained, motivated, and made aware of the prevention, control and ML/TF/FPWMD risk detection. Likewise, every year all our institution staff will receive information and courses, through a refreshment of knowledge. They will also be informed about new laws, regulations, or resolutions that are issued nationally and internationally. Both new and former employees will sign a document in which it will be expressly recorded that they have received this information. The topics on which special mention will be listed are the following:

- ❖ Common training for all personnel that includes the theoretical aspects of ML/TF/FPWMD risk, such as Concepts, methodologies, mechanisms, instruments, current legislation, and real cases, among others.
- ❖ Information activities for the General Management, especially in relation to the risks posed to the reporting party by the ML/TF/FPWMD methodologies that have been detected in the country or abroad, the statistics of suspicious activity reports detected by the company, as well as the effectiveness of the regulatory policies and procedures and the internal controls adopted.
- ❖ The personnel who enter will necessarily receive an induction in this matter.
- ❖ All others, in accordance with the organizational EXPOGANADOS DE COLOMBIA SAS structure, in such a way that the training is given to all the counterparties that in some way must have interfere in the activities of LA/TF/FPADM Self-control and Risk Management. Likewise, the program will cover the aspects that must be known by the staff at different levels, related to our economic activity.

The compliance officer must provide SAGRILAFT training, design, schedule, and coordinate training plans for all company personnel.

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The training plan regarding SAGRILAFT will have the following considerations:

- ❖ Annual frequency and compulsory attendance for all employees of the company.
- ❖ They will be taught during the induction process of new collaborators and third parties (not employees of the company when warranted). Whenever there is a rotation of personnel or a change of functions, the Human Talent and OHS Coordination area will be responsible for ensuring that the collaborator is trained concerning SAGRILAFT.
- ❖ Training programs must be constantly reviewed and updated following the changes that arise within the legislation and management under which SAGRILAFT operates.
- ❖ Have the mechanisms for evaluating the results obtained to determine the effectiveness of these programs and the scope of the proposed objectives.
- ❖ Indicate the scope of the training programs, the means that will be used to execute them, and the procedures that will be carried out to evaluate them. Training programs and plans must be in writing.
- ❖ As a result, training staff will be able to identify when a transaction is **unusual or suspicious**, when it should be reported, the means to do so, and to whom to report.

The training will be like a tool and will be part of the organization culture within the ML/TF/FPWMD Self-Control and Risk Management System and will be given by the Compliance Officer once a year, recording the training carried out, indicating at least the date, the subject covered and the name of the attendees.

6.9 DUTY OF CONFIDENTIALITY

To preserve the duty of confidentiality, the EXPOGANADOS DE COLOMBIA S.A.S. employees must keep it concerning the information reported to the authorities and all information related to SAGRILAFT.

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CHAPTER VII - PROCEDURES AND MEASURES FOR THE PREVENTION OF THE FT/FPADM SELF-CONTROL AND RISK MANAGEMENT SYSTEM

7.1 IDENTIFY THE SITUATIONS THAT MAY GENERATE THE TF/FPADM COMPANY RISK IN THE OPERATIONS, BUSINESS OR CONTRACTS THAT IT CARRIES OUT.

In order to identify those situations that may generate an ML/TF/FPWMD risk to the company in the operations that the company has, the following will be taken into account:

- ❖ All the operations, businesses, and contracts carried out by the company will be analyzed, in order to identify the situations that may generate ML/TF/FPWMD risk.
- ❖ This identification involves evaluating the sources of risk, i.e. counterparties.
- ❖ As an example of the risk indicators to which the operations, business or contracts carried out by the company may be exposed, they are the following:
 - a. Carrying out transactions with individual or legal entities who are not fully identified.
 - b. Buying goods with prices significantly lower than those offered by the market.
 - c. Accepting new partners or employees with a criminal record of money laundering or terrorist financing.
 - d. Admit new partners or shareholders without first verifying the origin of the resources they contribute.
 - e. Enter into operations, business or contracts without leaving a documentary record. Once the situations that may generate ML/TF/FPWMD risk have been identified according to the risk sources, a list must be prepared and leave each document analyzed recorded, to implement the necessary controls and facilitate their monitoring.

Likewise, when the company enters new markets or offers new goods or services, the legal representative must record this analysis and evaluate the ML/TF/FPWMD risk involved.

7.2 MATCHES IN RESTRICTIVE LISTS AND/OR ASSOCIATED WITH LAFT/FPADM

The following describes the handling that should be given to cases of positive matches in restrictive lists:

- **Counterparties that once belonged to Restricted Lists:** In the event that the counterparty has passed the process of accusation and inclusion in restrictive lists, that is, it has already been excluded from said restrictive lists, an intensified due diligence process will be carried out to confirm its linking or unlinking.

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- **Counterparties that currently belong to Restricted Lists:** The mere fact of appearing on an LAFT/FPADM list does not mean that a transaction can be categorized as suspicious or be terminated or interrupted in the relationship with the counterparties. In the event that when consulting the counterparty there is a coincidence in restrictive lists, the Compliance Officer will start the Intensified Due Diligence process to analyze your particular case and issue a decision regarding starting the relationship.
- **Counterparties included in Restricted Lists, after linking:** If after having linked a counterparty that initially did not match, is included in restrictive lists, the Compliance Officer will initiate the Intensified Due Diligence process to analyze their linking or unlinking.

In any case, the common steps to follow will be:

- a) Continue process
 - b) Suspend the operation.
 - c) DO not warn or inform the third party.
 - d) Wait for immediate manager or Compliance Officer instructions.
- **Counterparties included in PEP Lists:** When at the time of identification of the counterparty it is detected that it is included in the PEP Lists, more controls will be required, such as checking the background before the Attorney General's Office, do an intense due diligence and the negotiation must be approved by a higher instance who develops, within the organization, the counterparty's knowledge processes.

7.3 DUE DILIGENCE POLICY AND PROCEDURE

Due diligence in the knowledge of the counterparty will be implemented to the extent of each company, that is, according to the characteristics of the business and the way of marketing the goods it produces or the services it provides, which is why the following policies are adopted within the company within due diligence.

7.3.1 Special Due Diligence Categorization (CCM Category – Meets Minimum Amount)

This initial stage of analysis is carried out by the responsible areas of contracting in EXPOGANADOS DE COLOMBIA S.A.S. and the company's SAGRILAFT area will verify if the Due Diligence is applied to the counterparty that is being registered in the INTEGRASOFT portal.

There are cases in which the Due Diligence process does not apply, and the Compliance Officer must identify those situations once the areas of the company notify it. If the Third Party falls within the hypotheses listed below, the Compliance Officer will approve the record as a **"CCM Category"**, which includes, but is not limited to:

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7.3.1.1 Third parties associated to the State for the payment specifically of taxes, fees, contributions, public services, or specially regulated third parties.

a) **Third parties associated with compliance of legal obligations:** this group includes, for example, payments of taxes (taxes, fees, contributions, etc.) to supervisory, surveillance, tax and regulatory authorities, payments of costs to the State (here they include payments to courts and tribunals, procedural expenses, licenses, permits, and other costs derived from legal obligations) or relating to arbitration, payments to third parties in compliance with a court order or arbitration court, labor, judicial, or arbitration compensation, dispute resolutions and arbitrations.

b) **Public utility service concessionaires:** essential services of a public nature that, following the law of the country, are provided by the same State or were granted or authorized to be provided by individuals or companies, under their regulation, such as the supply of water, basic sanitation, electricity, gas, communications (telephony, internet, broadcasting) etc., as well as, in accordance with local legislation, concessions or authorizations for air, sea and land transport services, educational institutions, collection services, sending or delivery of correspondence and documents, notarial services, etc.

c) **Other Third Parties that, by virtue of regulations and audits from the State, or by the nature of the activities provided and respective risk, are previously exempted from Due Diligence:** i. Hotels and commercial airlines – when offering Third Parties, the contracting of accommodation services and purchase of air tickets follows specific guidelines of the Company, using its systems and databases ii. Banks and commercial financial institutions are subject to high levels of State regulations, control and oversight. *It does not include in this Due Diligence waiver the contracting of financial consulting services.* iii. Insurers – since they have their own specialized procedures for evaluating insurers.

7.3.1.2 Other third parties that are related to the company business transaction processes:

iv. Subscription payment for magazines and newspapers. v. Fairs and cultural events, congresses, symposia and other related activities provided that EXPOGANADOS DE COLOMBIA S.A.S is not a sponsor or donor of the event. vi. Licenses for the use of software and databases for consultation and information management – acquisition of licenses for access to the content that these companies also provide to indeterminate users. vii. **Simplified Purchases:** for the acquisition of goods and materials, or in case of provision of services, normally linked to the use of goods or materials, such as maintenance and machines maintenance services, vehicles, appliances and equipment, technical assistance, etc.; not being allowed, under any hypothesis, for the purchase of livestock (i) services of (ii) freight transport, consultancy and consultancies (iii) congeners such as examples, services of lawyers, accountants, veterinarians, (iv) negotiation, brokerage, or mediation, (v) engineering, architecture or construction, (vi) computer, rental, obtaining permits and licenses, etc. The acquisition of goods, materials or services (when permitted herein) will only be considered as "CCM" if: (i) the value of the purchase is equal to or less than fifteen.

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(15) legal minimum monthly wages in force per year (12 months), (ii) since there is no interaction with public agents.

7.3.1.3 Other situations, in which the Due Diligence process is applied.

The COMPLIANCE OFFICER must analyze the following: (i) information submitted by the area of the company that made the registration request; (ii) information from the registration form completed and signed by the supplier; and (iii) information obtained through a search of a database, websites, and specialized search systems, including tools for searching information of a reputational nature. The COMPLIANCE OFFICER analysis is guided by the query made in the search engines acquired by the company that encompasses objective criteria for determining and identifying risks. In the specific case under analysis, if one or more risks are identified, in the search, normal due diligence will be carried out, that is, as contemplated in section 7.3.1. If none of the risk factors are evidenced, the COMPLIANCE OFFICER shall approve the registration of the supplier in the "CCM Category".

7.3.2 Counterparty knowledge

The company must define, in accordance with its risks, if it is important to know the counterparty and how it should be done. The foregoing as a preventive measure of a possible contagion of activities related to ML/TF/FPWMD.

To provide security for the counterparty's knowledge process, and when the transaction allows it, it is recommended, by way of example, the following: Know by any legal means, the origin of the resources, verify the identity of the counterparty, its address and telephone and, according to the characteristics of the negotiation, request the certificate of existence and legal representation for the case of legal entities and any other additional information that is considered pertinent. The information provided by the counterparty, as well as the name of the person who verified it, must be duly documented, with date and time, for evidentiary purposes of due and timely diligence and intensified due diligence if applicable.

Taking into account the above, the company implements a procedure of knowledge of the counterparty and in our case our counterparty and associates through the contracts which must contain the minimum data of the associates to be able to perform a ML/TF/FPWMD risk analysis.

In the case of the counterparty located abroad, they will be requested the respective documentation or equivalent document depending on the location of the potential client or current clients and the financial operations will be carried out through the financial system for greater control on ML/TF/FPWMD issues.

In all cases, the third party with an interest in having any relationship with the COMPANY, regardless of whether it does so as a commercial, business, contractual or legal relationship of any kind,

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such as partners, employees, customers, contractors, and suppliers, must undergo a minimum due diligence process and it is mandatory to complete the binding forms established by the COMPANY attaching the additional documentation requested.

The consultations in restrictive lists must be before any linkage with the company or at least must be an alternative to the contracting process if it must be carried out immediately, this to minimize the risks of linking a person who is exposed to a ML/TF/FPWMD risk.

All contracts agreed between the company and the counterparty must have the SAGRILAFT compliance stipulations and clauses.

Once all the documentation requested from the counterparty is available, the Compliance Officer will proceed to consult the restrictive lists that the company has for this purpose. Currently, the company has the MULTIBURO BIG DATA search engine.

SAGRILAFT due diligence processes in EXPOGANADOS DE COLOMBIA SAS refer to:

- a. Customers Knowledge
- b. Knowledge of the members of the General Shareholders' Meeting
- c. Knowledge of directors and collaborators
- d. Politically exposed persons (PEP)
- e. Supplier Knowledge
- f. Knowledge of related parties

For the analysis of transactions with the counterparty, the company builds a database that allows it to consolidate and identify present or future alerts.

As part of its ML/TF/FPWMD self-monitoring and risk management system, the company must determine which counterparty constitutes the greatest ML/TF/FPWMD risk to its business.

To comply with the above within our market segmentation, it was defined, taking into account those sectors of the economy that could expose the company to the greatest degree to ML/TF/FPWMD risk, as follows:

- Non-profit Organizations
- Founding/NGOs.
- Road freight transportation sector, sea transportation.
- Agricultural and livestock sector.
- Activities related to the agricultural and livestock sector.
- Politically exposed persons ("PEPs").

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For the verification of binding and restrictive lists in the linking or document update, the *COUNTERPART LINKING FORM FVIN-2* and the *LAUNDERING MONEY PREVENTION STATEMENT OF ASSETS FRAGI-1* and attach the following documents:

Individual

- a. A legible photocopy of the citizenship or immigration card, if not available, a copy of the main page of the passport will be requested.
- b. Tax Payer ID
- c. Bank Certificate
- d. Duly certified Financial Statements with their respective notes.
- e. Photocopy of the professional card of the accountant and/or Tax Auditor.
- f. Income Statement or Non-declarant Certification.

Additionally, when the company links a PEP, it must request the following documents:

- g. Proof of Income: Certificates of income and withholdings, labor certificate or other document that fully identifies the origin and source of the resources.

Legal Entity:

For the verification of binding and restrictive lists in the binding or documentary update, the *COUNTERPART LINKING FORM FVIN-2* must be completed, *LAUNDERING MONEY PREVENTION STATEMENT FRAGI-1*, *STOCK OWNERSHIP CERTIFICATE FPA-2* for those legal entities who must comply with any LAFT Risk Control Regime, they must complete the *CERTIFICATION APPLYING LAFT STANDARDS FCAN-1* and attach the following documents:

- a. Certificate of Existence and Legal Representation no more than 30 days.
- b. Legible photocopy of the citizenship or immigration card of the Legal Representative or Special Representative.
- c. Tax Payer ID
- d. Bank Certificate
- e. Duly certified financial statements with their respective notes.
- f. Photocopy of the professional card of the accountant and/or Tax Auditor.
- g. Income Statement

In the event that the legal Entity belongs to a special sector that must have authorization and/or resolution by a superintendence, they must also attach it as a requirement of connection to the company.

The due diligence process will be the responsibility of the area that advances the process of linking the counterparty; that is, the areas responsible for EXPOGANADOS DE COLOMBIA S.A.S. will be: Purchasing, Human Resources and Foreign Trade, who will be responsible for requesting the documentation required in this Manual to register it in the documentary BPM that the company has, for review and consultation in restrictive lists by the Compliance Officer and in this way approve the counterparty for their linking.

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7.3.3 Politically Exposed Persons Knowledge - (PEP)

EXPOGANADOS DE COLOMBIA S.A.S. establishes the following procedure for the knowledge and connection of Individuals who, due to their profile or the functions they perform, may expose society to a greater degree to the risk of ML/TF/FPWMD, such as: those who, due to their position, manage public resources, have the power to dispose of them or enjoy public recognition.

For those clients and/or suppliers of EXPOGANADOS DE COLOMBIA S.A.S., who comply with said PEP recognition, more demanding control and monitoring procedures than normal must be applied. However, the following issues should be noted:

- Knowing the customer and/or PEP provider means permanent and updated knowledge of their identification, economic activity, characteristics, amounts, origin, and destination of their income and expenses.
- For the linking of a client and/or PEP provider or the updating of their data, the information that allows comparing the characteristics of their operations with those of their economic activity must be collected, without exception. Likewise, validate it and establish behaviors of normality or unusualness.
- The client's operations, business, and contracts and/or PEP provider must be continuously monitored, through any technological mechanism.
- For the above, the Compliance Officer must have elements of judgment that allow analyzing the unusual operations of PEP clients and/or suppliers and determine the existence of suspicious operations carried out or attempted, in accordance with the objective criteria established by the General Shareholders' Meeting.
- To update the supplier's information and other related third parties, they must complete the *COUNTERPARTY LINKAGE FORM FVIN-2*, which must be fully completed, signed and attached the required supporting documents. This information must be validated and confirmed by EXPOGANADOS DE COLOMBIA S.A.S. in charge linking area.

This type of PEP clients and/or providers can be divided, in turn, into three categories: Politically Exposed Persons – PEP; Persons with Public Recognition – PRP; and Persons Managing Public Resources – PMRP.

By way of example, those who hold important public positions can be classified as PEPs (this list is not exclusive), such as the following:

- President of the country.
- Heads of State
- Heads of Government
- Vice President of the country.
- Ministers.

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- Senators
- House Representatives.
- Magistrates of the High Courts.
- Governors
- Majors
- Deputies of the Departmental Assemblies.
- Council Members
- Chief executives of oblasts
- Directors of the different Secretariats at the departmental, district and municipal levels.
- Directors of decentralized entities.
- Active members of the Military Forces, and Police Officers from the rank of colonel inclusive onwards and their counterpart positions in other forces.
- Treasurers of different State entities of the national, departmental, and municipal order.

People who are widely recognized in the community for their activity, relationship with the community, or some special skill may also be considered PEPs. Some examples of people with public recognition could be the following:

- Political Members of political parties)
- The arts (Included are, the significant representatives of the different cultural manifestations such as acting, painting, sculpture, writing, etc.).
- The celebrity (Models, beauty queens, TV presenters, designers, stylists, etc.).
- Sport.
- The sciences
- Religious Representatives

7.3.4 Knowledge of collaborators

For compliance with the Knowledge policy of collaborators, EXPOGANADOS DE COLOMBIA S.A.S. shall:

- Know the personal data of their collaborators and their family nucleus, either at the time of their connection or on the periodic updating of information.
- Know and verify the documentary supports that justify their academic and work skills.
- Confirm family, personal and work references of your employees.
- Train employees who by their position are exposed to risks of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction.
- The Human Management process must be attentive to the presentation of red flags in relation to ML/TF/FPWMD risk and report them immediately to the Compliance Officer.

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7.3.5 Knowledge of suppliers or related third parties.

Suppliers and other third parties linked to EXPOGANADOS DE COLOMBIA S.A.S. that provide services or supply products to the different processes must comply with the requirements indicated below in order to prevent the performance of illicit activities or that could be related to the ML/TF/FPADM risk:

- Knowledge of suppliers and other related third parties, whether individual or legal entities, implies permanent and updated knowledge of their identification, economic activities, characteristics, amounts traded, origin and destination of their income.
- For the linking of a supplier or linked third parties or for the updating of their data, information must be collected that allows comparing the characteristics of their contractual relationship with those of their economic activity. Likewise, validate it and establish behaviors of normality or unusualness.
- The operations, business, and contracts of suppliers and other related third parties must be continuously monitored, through any suitable technological mechanism.
- For the above, the Compliance Officer must have elements of judgment that allow analyzing the unusual operations of suppliers and other related third parties and determine the existence of suspicious operations carried out or attempted, in accordance with the objective criteria established by the General Shareholders' Meeting.
- For updating the information of suppliers and other related third parties, formats or forms can be established that must be fully completed, signed, and attached to the required supporting documents. This information must be validated and confirmed by EXPOGANADOS DE COLOMBIA S.A.S. area in charge of linking.

7.3.6 Knowledge of Shareholders

When EXPOGANADOS DE COLOMBIA S.A.S carries out placement of shares to persons other than its current shareholders, the requirements indicated below must be complied with:

a. Shareholders' knowledge begins from the moment an individual or legal entity begins the process of acquiring EXPOGANADOS DE COLOMBIA S.A.S. shares.

b. For the updating of shareholder information, all established internal procedures must be complied with, the required documentation must be obtained, and said information must be validated.

In the event that the information provided by a shareholder cannot be confirmed or is inaccurate, this fact must be reported to the compliance officer immediately following this SAGRILAFT Manual.

If the information provided by the shareholder is false or allegedly false, this fact must be reported to the Compliance Officer immediately following this SAGRILAFT Manual.

Evidence of the verifications carried out must be left in different restrictive lists or queries in databases on the linking or updating of shareholder information. In case positive results

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that could be related to the risk of LAFT, this fact must be reported to the Compliance Officer immediately following this SAGRILAFT Manual

7.3.7 Customers knowledge

In accordance with local regulations and international standards, the client must be known to prevent EXPOGANADOS DE COLOMBIA S.A.S. from being used to carry out illicit activities or could be related to ML/TF/FPDAM risk. Therefore, Customers must comply with the following requirements:

- a. Knowing the customer, whether a natural or legal person, means permanent and up-to-date knowledge of their identification, economic activity, characteristics, amounts, origin, and destination of their income and expenses.
- b. For the linking of a client or the updating of their data, information must be collected that allows comparing the characteristics of their operations with those of their economic activity. Likewise, should be validated to establish normal or unusual behavior.
- c. The operations, business and contracts of customers must be continuously monitored, through any suitable technological mechanism.
- d. For the above, the Compliance Officer must have elements of judgment that allow analyzing unusual customer transactions and determining the existence of suspicious transactions carried out or attempted, in accordance with the objective criteria established by the Shareholders' Meeting
- e. For the linking and updating of customer information, the SAGRILAFT Linking Forms must be completed in full, and the required supporting documents must be attached. This information must be validated and confirmed by EXPOGANADOS DE COLOMBIA S.A.S. area in charge of linking.

In the event that the information provided by a client cannot be confirmed, is inaccurate, false or allegedly false, this fact must be reported to the compliance officer immediately in accordance with this SAGRILAFT Manual.

7.3.8 Updating information

The update of the information of the counterparty (employees, suppliers, customers, shareholders and other related third parties), contained in the formats established for this purpose, as well as its annexes, must be updated at least once a year, said update must also include verification in binding lists.

The collection of documentation and information updated annually by the counterparties is the responsibility of the area in charge of linking and is the one who requests said documents, which, in case of evidence of any unusual operation as a result of said verification, must notify the

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Compliance Officer by submitting the relevant support and evidence. The Compliance Officer must make the queries in initial and subsequent restrictive lists in the system that the company has for this purpose. It currently has the MULTIBURÓ BIG DATA search engine, but it could use the ones that the company has contracted at the time.

It is considered information that can be updated that by its nature can present changes, in the case of Individuals, the minimum information is to update the telephone address, email, economic activity, occupation and partially or totally that related to financial information. Regarding legal entities, the update of the above information must be obtained, in addition to that related to the identification of the Legal Representative and the confirmation of the corporate composition.

For all these processes, evidence must be left of the queries made in different restrictive lists or queries in the database on the linking or updating of the information of the Collaborators, Shareholders, Customers, Publicly Exposed Persons, Supplier or Linked Third Party. In the event of positive results that could be related to ML/TF/FPWMD risk, it must be reported to the General Shareholders' Meeting and the Legal Representative to determine the actions to be taken.

In the event that the information provided by the Collaborators, Shareholders, Customers, Publicly Exposed Persons, Supplier or Related Third Party is false or allegedly false, cannot be confirmed or is inaccurate, this fact must be reported to the Compliance Officer immediately in accordance with this SAGRILAFT Manual.

7.3.9 Policy Holder

The holder of the SAGRILAFT policy is the EXPOGANADOS DE COLOMBIA SAS **General Assembly of Shareholders** that approves it taking into account the proposal of the Compliance Officer.

7.4 INTENSIFIED DUE DILIGENCE PROCEDURE

The Intensified Due Diligence process involves an advanced knowledge of the Counterparty and the origin of the assets received, which includes activities in addition to those carried out in the Due Diligence, this work will oversee the Compliance Officer. These procedures must:

- ❖ Apply to those counterparties that:
 - (i) The company considers that they represent a greater risk.
 - (ii) To PEPs; and
 - (iii) For those individual or legal entities located in non-cooperative countries and high-risk jurisdictions, for the latter, the highest risk countries contained in the FATF lists of non-cooperative countries and high-risk jurisdictions must be reviewed.

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Intensified Due Diligence measures consist of:

- Increase the frequency in the review and monitoring of the transactional activity of the Counterparty or conditions of the negotiation and reasonableness (for those people, the consultation will be made in restrictive lists each time there is a transaction).
- Conduct inquiries and apply additional identification and verification measures, such as: obtaining information on the main counterparties, collecting information from public or open sources, origin of resources.
- The decision to accept and/or maintain the relationship with the third party will be made by the Legal Representative.
- Due to the risk, they may represent for the Company, the knowledge of the Counterparty up to its Final Beneficiary must be ensured and those who hold the quality of PEP must be determined.
- In the event that the individual with whom the relationship is established is in turn a subject obliged to have SAGRILAFT, the company must request a certification that allows corroboration that that person fully complies with the standards required in the matter and particularly the obligations imposed on the prevention of ML/TF/FPWMD.
- Carrying out visits to the counterparty's facilities to verify their existence.
- Register in the system or in the database the third parties classified in this group, in order to have greater control and monitoring.

7.5 TRANSACTIONS WITH VIRTUAL ASSETS

The Company does not make or receive contributions, nor does it make transactions or investments or provide services related to Virtual Assets.

7.6 SUSPICIOUS AND UNUSUAL TRANSACTIONS PROCEDURE

The identification and analysis of the operations detected as unusual must allow, in accordance with the objective reasons established by EXPOGANADOS DE COLOMBIA S.A.S., to identify whether or not a transaction is suspicious and report it in a timely manner to the UIAF and/or the competent authority. Therefore, all those unusual transactions that once sufficiently analyzed and documented cannot be reasonably explained or justified will be determined as suspicious transactions. These internal suspicious transactions must be duly documented for the Compliance Officer to determine or not their respective report to the UIAF.

Once a transaction is classified as suspicious by the Compliance Officer, the UIAF must be immediately informed through the respective Suspicious Operations Report (STR), in accordance with the procedures and methodology indicated by that entity.

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When the operations, business and contracts attempted are the reason for the ROS report, EXPOGANADOS DE COLOMBIA S.A.S., will immediately reject such action and such operation or contractual link with EXPOGANADOS DE COLOMBIA S.A.S. will not be perfected.

The identification of a suspicious transaction of a Individual or legal entity linked to EXPOGANADOS DE COLOMBIA S.A.S. does not imply the termination of the contractual or commercial relationship. Once the operation has been detected, classified as suspicious and reported to the UIAF, the Compliance Officer together with the General Management will decide on the continuity or not of the contractual or commercial relationship and must notify the General Shareholders' Meeting of said situation.

If so, special care must be taken over the collaborator, customer, shareholder, supplier or related third party and their operations, to detect possible unusual new transactions. If not, the relevant area must carry out the necessary procedures for the separation or cancellation of the contractual or commercial relationship. Both the STR and the studies and analyses before the classification of the operation as suspicious are subject to a legal reserve, so it must be handled confidentially and secretly by all employees and related to EXPOGANADOS DE COLOMBIA S.A.S., without prejudice to the sanctions provided for herein. Under no circumstances will the company's collaborators or external personnel be made aware of the information of the operations reported as suspicious to the UIAF. The foregoing will be sanctioned in accordance with the Internal Labor Regulations, Code of Ethics and Conduct and other rules or regulations.

7.7 POLICY OF INDIVIDUALS INCLUDED IN THE LA/FT/FPADM RESTRICTIVE LISTS

The knowledge of the counterparty must lead to the comprehensive identification of its identity and activities. It is, therefore, a policy to establish mechanisms that allow us to know the identity of our customers, determine exactly what type of economic activity they carry out, collect information that allows us to compare the characteristics of their transactions with those that can be expected from their economic activity and have elements of judgment that allow us to analyze the unusual transactions of those customers and determine the existence of suspicious transactions.

The counterparty found in the following binding and restrictive lists may not be linked to the company and the materialization of any business relationship with them is prohibited:

- ❖ Customers who are included in the restrictive lists (OFAC, UN). Among others. (SAGRILAFT Control lists).
- ❖ UN Lists
- ❖ EU lists

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7.8 IDENTIFICATION AND REPORTING OF UNUSUAL OPERATIONS.

The objective of this policy is to identify unusual operations, understood as those whose amounts or characteristics are not related to the economic activity of customers, shareholders, suppliers, employees or related third parties, or that, by their number, by the amounts transacted or by their particular characteristics, are outside the parameters of normality established by EXPOGANADOS DE COLOMBIA S.A.S.

The area that detects an unusual operation must immediately inform the Compliance Officer, either through email written communication or verbal communication, if the urgency or circumstances so warrant.

For its part, the Compliance Officer must analyze said unusual operation in order to evaluate the reasonableness or not of its origin and determine if it may be associated with ML/TF/FPWMD risk. The analysis will be made with information, documents and any other data that contributes to its understanding.

In the event that some explanations or justifications make the operation considered unusual and reasonable, the action will be filed together with said explanations for subsequent follow-up.

7.9 IDENTIFICATION AND ANALYSIS OF WARNING SIGNS

The warning signs are facts, circumstances, situations, events, amounts or financial reasons and other information that the Company determines as relevant, from which the existence of a fact or situation that may materialize an ML/TF/FPWMD risk situation can be inferred in a timely and/or prospective manner.

EXPOGANADOS DE COLOMBIA S.A.S. has designed and established patterns that can be considered a warning sign, considering those normal for the sector and its operation.

These are some warning signs of LAFT/FPADM Risks, which must be taken into account, according to the risk factors identified in the EXPOGANADOS DE COLOMBIA S.A.S. risk matrix.

- Financial movement not consistent with the information of income received in the development of its economic activity, nor with the monthly expenses declared by the client.
- Increases (equity, income, operations, amounts, etc.) not justified or outside the averages of the respective sector or economic activity.
- Transactions carried out in cities and/or branches that are not related to the company's economic activities.
- The logistics where the business is developed are not in accordance with the money traded or with the amounts handled by the counterparty.
- Identification numbers entered in the endorsements of the first beneficiary that correspond to those assigned by the competent entity.
- Final beneficiary of the money whose name, surname, and identification correspond in their entirety with people known through the different media and who have a direct relationship with outlaw groups.

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- a. Alleged misuse of identities, for example, use of non-existent identification numbers, identification numbers of deceased persons, impersonation of persons, alteration of names.
- b. Submission of documents or data or allegedly false information.
- c. Acting on behalf of third parties or businesses with the possibility of front.
- d. Carrying out fictitious or simulated operations, such as the use of apparent facade, paper or screen companies.
- e. Relationship with individuals linked or allegedly criminal activities.
- f. Relationship with goods of presumed illicit origin.
- g. Splitting or excess of cash operations.
- h. Refusal by natural or legal entity to share information on their activity or constitution (Chamber Certificates, Shareholders' Composition, etc.)
- i. Individual or legal entities linked without carrying out Due Diligence and consultations on restrictive lists.
- j. Donations that do not have an apparent final beneficiary, that do not know their origin or that are domiciled in a high-risk country or jurisdiction.
- k. Transactions with subcontractors without commercial or contractual link with the company

EXPOGANADOS DE COLOMBIA S.A.S. must keep the supports that led to qualifying the unusual operation or as simply a warning signal, in accordance with the provisions of article 28 of Law 962 of 2005, or the rule that modifies or replaces it, on conservation of books and commercial papers.

7.10 RELATED DOCUMENTS

EXPOGANADOS DE COLOMBIA S.A.S. documents related to SAGRILAFT system and that are an integral part of it are:

- External reporting
- Internal reporting
- Counterparts Linking Formats
- Risk and Control Matrix PTEE - SAGRILAFT
- SAGRILAFT and PTEE Compliance Policies
- Transparency and Business Ethics Program
- Registration of unusual and suspicious transactions (Confidential document for use and exclusive updating by the Compliance Officer)

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CHAPTER VIII.- INSTRUCTIONS AND SANCTIONS SAGRILAFT.

For EXPOGANADOS DE COLOMBIA S.A.S. compliance with the rules is not optional, it is a commitment of all the people who are part of society that adds benefits to the organizational value chain.

The guidelines issued by the Superintendency of Companies to EXPOGANADOS DE COLOMBIA S.A.S., for its prevention and reasonable implementation measures of ML/TF/FPWMD Risk, in accordance with its instructions, will be adopted immediately to the extent possible and following the scope determined by the General Shareholders' Meeting. The foregoing is the exercise of the Superintendency of Companies function to instruct the entities subject to its supervision, on the measures they must adopt for the prevention of ML/TF/FPWMD Risk, provided for in numeral 28 of article 7 of Decree 1736 of 2020.

Failure to comply with the activities indicated in this manual and its annexed documents, as well as the orders and instructions given by the General Assembly of Shareholders through the Compliance Officer, will result in the administrative investigations that are appropriate, and the imposition of the sanctions provided for in the INTERNAL WORK REGULATIONS.

EXPOGANADOS DE COLOMBIA S.A.S. knows that non-compliance with the legal regulations governing the real sector in matters of ML/TF/FPWMD Risk Prevention, gives rise to relevant administrative sanctions to the company, by the Superintendency of Companies to the Compliance Officer, the Tax Auditor and its administrators, in accordance with the provisions of paragraph 3 of Article 86 of Law 222 of 1995 and Chapter II Sanctioning Regime of Law 1778 of 2016, without prejudice to the actions that correspond to other authorities.

APPROVAL AND CHANGE CONTROL

This SAGRILAFT Manual of EXPOGANADOS DE COLOMBIA S.A.S. was submitted for consideration to the General Shareholders' Meeting, which approved it by Minutes # 16 of December 11, 2023:

Version	Author	Date	Changes/Comments	Approved
1.0	COMPLIANCE OFFICER	October 15 th , 2021	Creation	Minute No. 8 of 2022
2.0	COMPLIANCE OFFICER	December 11 th , 2023	Update	Minute No. 16 of 2023

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CERTIFICADO DE AUTENTICIDAD

Yo, el abajo firmante, GUSTAVO ADOLFO DOMINGUEZ VILLADA, traductor e intérprete oficial de los idiomas INGLÉS-ESPAÑOL-INGLÉS, en virtud de la Resolución No. 456 con fecha del 07/09/2016, emitida por la Universidad Nacional de Colombia, certifico por medio del presente que la anterior es una traducción correcta y real del documento enviado a mí por el candidato. En constancia de lo anterior suscribo la presente con mi firma y sello oficial el día **25 de abril de 2024**.

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