CCLA

CCLA

SAGRILAFT and PTEE

Training 2026

SELF-CONTROL AND COMPREHENSIVE RISK MANAGEMENT SYSTEM FOR ML/TF/WMDFP – SAGRILAFT

General aspects related to the prevention and management of the Risk of Money Laundering, Terrorism Financing, and Financing of the Proliferation of Weapons of Mass Destruction (ML/TF/WMDFP)

REGULATORY FRAMEWORK

Chapter X of the Basic Legal Circular of the Superintendency of Companies (External Circular 100-000008 of July 12, 2022).

Objective:

Administration, prevention, and control of the risk of Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction (LA/FT/FPADM).

MONEY LAUNDERING

Article 323 of the Criminal Code.

Money Laundering is the process by which an appearance of legality is given to goods, resources, or assets of illicit origin, for the purpose of introducing them into the formal economy through the real sector or the financial sector. This is carried out through the movement of assets and money to make it difficult to follow or trace the illicit origin of their illicit profits.

Criminal implication: Penalty against the person who commits the crime: Imprisonment from ten (10) to thirty (30) years and a fine of one thousand (1,000) to fifty thousand (50,000) current legal monthly minimum wages.

TERRORIST FINANCING

Article 345 of the Penal Code.

It is the process by which goods, resources, or assets of illicit or licit origin are obtained to carry out terrorist activities; that is, those that generate anxiety, fear, or terror in the population through acts that endanger the life, physical integrity, or freedom of persons, buildings, the means of communication, the means of transportation, and the means of data processing or transmission, making use of instruments capable of causing devastation.

Criminal penalty: Imprisonment from thirteen (13) to twenty-two (22) years and a fine of one thousand three hundred (1,300) to fifteen thousand (15,000) current legal monthly minimum

wages.

FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

Recommendation 7 of the International Standards on Combating Money Laundering, the Financing of Terrorism and Proliferation of the Financial Action Task Force (FATF).

It is any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment of material, fractionation, transport, transfer, deposit or use of nuclear, chemical or biological weapons, their means of delivery and other related materials in contravention of national laws or international obligations, when the latter is applicable.

PARTIES RESPONSIBLE FOR THE PREVENTION OF ML/TF/PWMDF

1. Shareholders' Meeting.
2. Legal Representative.
3. Compliance Officer.
4. Statutory Auditor.
5. Employees.

CCLA

- Sebastian Luque Jensen
- VP
- Camilo Mendez
- Senior Investments Associate
- Natalia Vargas
- Development Associate
- Andrea Hernández
- Investments Analyst
- Juliana Rivera
- Investments Analyst
- Natalia Camargo
- Investments Associate
- Kely Rincón
- Office Manager
- Angela Paz
- Development Coordinator
- Daniel Castro
- Development Coordinator

STAGES OF SAGRILAFT

a. Risk Identification.

b. Risk Measurement or Assessment.

c. Risk Control.

d. Risk Monitoring.

These stages are developed in the LA/FT/FPADM/C/ST Risk Matrix.

RISK FACTORS

Counterparties

- Clients
- Collaborators
- Suppliers

Products

- Nature
- Characteristics
- Market

Channels

- Channel characteristics
- Nature of transactions

Jurisdictions

- Location
- Characteristics of the environment
- Nature of transactions

PREVENTION AND CONTROL OF AML/CFT RISK

1. **Reports.**

- Unusual Transaction Report.
- Suspicious Transaction Reports.

2. **Due Diligence and Enhanced Due Diligence Procedures.**

- Know Your Counterparty process.
- Searches on restrictive and binding lists and databases.
- Monitor clients and other counterparties.

REPORTS OF NON-COMPLIANCE WITH SAGRILAFT

Reports related to acts of Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction can be made directly to the Company's

Compliance Officer at the email address: cumplimiento8@ustarizabogados.com.

The Compliance Officer and the Company guarantee the confidentiality of the reporters.

NON-COMPLIANCE WITH SAGRILAFT

Consequences for Employees.

In accordance with the Internal Work Regulations, non-compliance with SAGRILAFT can be considered grounds for the termination of the employment contract with just cause, or the necessary sanctions and measures will be applied as appropriate.

Consequences for Suppliers, Contractors and/or Clients.

The supplier, client and/or contractor who breaches the stipulated policies, affecting the business relationship, will commit a serious breach, and this will be considered grounds for termination of the contract.

TRANSPARENCY AND CORPORATE ETHICS PROGRAM

General aspects related to the prevention and management of the Risk of Corruption and Transnational Bribery.

REGULATORY FRAMEWORK

Chapter XIII of the Basic Legal Circular of the Superintendence of Companies (External Circular 100-000008 of July 12, 2022).

Objective:

The identification, detection, prevention, management, and mitigation of the risks of Transnational Bribery and Corruption that may affect the Company and all related parties and stakeholders, understood as: (i) Collaborators; (ii) Clients; (iii) Contractors; (iv) Suppliers; (v) Shareholders and (vi) all those with whom any commercial, contractual, or cooperation relationship is directly or indirectly established.

TRANSNATIONAL BRIBERY

Article 2 of Law 1778 of 2016.

It is the act whereby employees, administrators, associates, or even third parties linked to a legal entity, give, offer, or promise to a foreign public official, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value, or (iii) any benefit or utility in exchange for said public official performing, omitting, or delaying any act related to their functions and in connection with an international business or transaction.

CORRUPTION

Chapter XIII of the Basic Legal Circular of the Superintendence of Companies.

It is all conduct aimed at a Company benefiting, or seeking a benefit or interest, or being used as a means for the commission of crimes against the public administration or public assets or in the commission of acts of Transnational Bribery.

CONFLICT OF INTEREST

It exists when the simultaneous satisfaction of two interests is not possible; if the administrator has an interest that could cloud their objective judgment or when circumstances arise that create a risk that their discernment may be compromised.

CONFLICT OF INTEREST

When the administrator:

- Conducts transactions with natural or legal persons with whom they have a relationship of dependency.
- Sues the company, even if said lawsuit is handled by the alternate legal representative.
- While acting as legal representative, issues negotiable instruments of the company in their favor.
- Enters into labor conciliation agreements in their favor.

When the members of the Shareholders' Meeting approve:

- The determination of the adjustment to the lease payment for warehouses they own.
- Their fees if said authority has not been expressly delegated to them in the bylaws.

FUNDAMENTAL ELEMENTS OF THE PTEE

The PTEE shall regulate the following aspects:

- Compliance Policy of the PTEE.
- Organizational Structure.
- The giving and offering of gifts or invitations to third parties.
- Expenses related to entertainment and travel activities.
- Political contributions of any kind.
- Donations.
- Training.
- Specific procedures under the responsibility of the Compliance Officer, aimed at implementing the Compliance Policy.
- Stages of the PTEE.
- Red Flags.
- Receipt of reports.
- Consequences for non-compliance with the PTEE.
- C/ST Risk Matrix.

ORGANIZATIONAL STRUCTURE

CCLA

- **Sebastian Luque Jensen**

VP

- **Camilo Mendez**

Investments Senior Associate

- **Natalia Vargas**

Development Associate

- **Angela Paz**

Development Coordinator

- **Daniel Castro**

Development Coordinator

- **Andrea Hernández**

Investments Analyst

- **Juliana Rivera**

Investments Analyst

- **Natalia Camargo**

Investments Associate

- **Kely Rincón**

Office Manager

PARTIES RESPONSIBLE FOR THE PREVENTION OF C/ST

1. Shareholders' Meeting.
2. Legal Representative.
3. Compliance Officer.
4. Statutory Auditor.
5. Employees.

CCLA

- **Sebastian Luque Jensen**
- VP
- **Camilo Mendez**
- Senior Investments Associate
- **Natalia Vargas**
- Development Associate
- **Angela Paz**
- Development Coordinator
- **Daniel Castro**
- Development Coordinator
- **Andrea Herrández**
- Investments Analyst
- **Juliana Rivera**

- Investments Analyst
- **Natalia Camargo**
- Investments Associate
- **Kely Rincón**
- Office Manager

RISK FACTORS

Third Parties	Country	Economic Sector
* Clients	* Location	* Channel characteristics
* Collaborators	* Characteristics of the environment	* Nature of the transactions
* Providers	* Nature of the transactions	

STAGES OF THE PTEE

1. Identification of C/ST Risk.
2. Measurement or assessment of C/ST Risk.
3. Control of C/ST Risk.
4. Monitoring of Compliance Policies and PTEE.

These stages are developed in the LA/FT/FPADM/C/ST Risk Matrix.

RED FLAGS

In the analysis of accounting records, operations, or financial statements:

- Transfer of funds to countries considered to be tax havens.
- Operations that lack a logical, economic, or practical explanation.

In the corporate structure or corporate purpose:

- Complex or international legal structures with no apparent commercial, legal, or tax benefits, or owning and controlling a legal entity without a commercial purpose, particularly if it is located abroad.

In the analysis of transactions or contracts:

- Payments to related parties (Associates, Employees, Subsidiaries, branches, among others) without apparent justification.

REPORTS OF NON-COMPLIANCE WITH THE PTEE

Reports related to acts of Corruption and Transnational Bribery can be made directly to the Company's Compliance Officer at the email address: cumplimiento8@ustarizabogados.com.

The Compliance Officer and the Company guarantee the confidentiality of the reporting parties.

Likewise, they may be filed directly with the Superintendency of Companies through its website (https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-deDenuncias-Soborno-Internacional.aspx and

http://www.secretariatransparencia.gov.co/observatorio-anticorrupcion/portalanticorrupcion) or its telephone line 601 2201000.

NON-COMPLIANCE WITH THE PTEE

Consequences for Employees.

In the event that any Employee fails to comply with the stipulated current regulations, the Company and the Compliance Officer will jointly analyze the breach to establish its severity and, in accordance with the Internal Work Regulations, this may be considered grounds for the termination of the employment contract with just cause, or the necessary sanctions and measures will be applied as may be appropriate.

Consequences for Suppliers, Contractors and/or Clients.

The supplier, client and/or contractor that fails to comply with the stipulated policies, affecting the commercial relationship, will incur a serious breach, and it will be considered as grounds for termination of the contract.

CASES

1

Tierra Santa: Stores Raided for Alleged Money Laundering on the Coast

The Tierra Santa store chain in Barranquilla, Cartagena, Montería, Maicao, and Valledupar is being investigated for alleged money laundering and smuggling, through the textile and clothing business.

The business was raided on Tuesday afternoon in these capital cities following an operation by the Office of the Attorney General of the Nation in coordination with the National Police and the National Directorate of Taxes and Customs (Dian).

2

La Riviera Colombia on the blacklist for money laundering and drug trafficking

The La Riviera stores in Colombia were used to launder money originating from drug trafficking activities for the purpose of aiding criminal organizations.

3

First Case of Asset Laundering by a Colombian Company Found in the Panama Papers

The director of the DIAN, Santiago Rojas, revealed that the agency discovered the first case of asset laundering involving Colombians who are on the list of the so-called Panama Papers.

4

Alex Saab extradited to the U.S.

Once considered the Minister of Finance in Venezuela, he is accused of laundering millions of dollars, selling gold, robbing Venezuelans through corruption by means of social programs such as the Clap, and also of being part of the drug trafficking chain in that country.

5

Piedad Córdoba Detained in Honduras

The Senator was detained this Wednesday in Honduras with almost $68,000 that she did not declare at an airport in the central region of the Central American country.

Thank you

USTARIZ & ABOGADOS

Law Firm

S&P | Chambers AND PARTNERS | Best Lawyers | LEGAL 500 | ISDA