Risks and Compliance

Comprehensive Guide to

SAGRILAFT AND PTEE

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Sanimax of Colombia SAS

At Sanimax of Colombia, we are committed to SAGRILAFT and PTEE, ensuring integrity and transparency in our operations through rigorous policies and ongoing training.

Scope of Application Addressed to customers, suppliers, and third parties.

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Introduction

In today's complex business environment, companies face various risks associated with money laundering, terrorist financing, and the proliferation of weapons of mass destruction (ML/TF/PWMD). These risks may cause serious reputational, financial, and legal harm. To mitigate these threats and promote transparency and ethics, Sanimax of Colombia has implemented the SAGRILAFT and PTEE systems, demonstrating its commitment to regulatory compliance and good business practices. At Sanimax of Colombia, we understand that compliance with regulations and the adoption of good practices are essential to maintaining the trust of our customers, partners, and society in general.



What is SAGRILAFT?

A Self-Control and Comprehensive Risk Management System for Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (FPWMD).



What is SAGRILAFT for?

The purpose of the SAGRILAFT system is to prevent, detect, and manage risks related to money laundering (ML), terrorist financing (TF), and the financing of the proliferation of weapons of mass des-truction (FPWMD) to which Sanimax of Colombia S.A.S. may be expo-sed, including reputational, legal, operational, and contagion risks.

Who is responsible for complying with SAGRILAFT?

SAGRILAFT establishes policies and guidelines that apply universally to shareholders, employees, suppliers, contractors, cus-tomers, and any natural or legal person acting on behalf of Sanimax of Colombia S.A.S. or contractually linked to it.

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At Sanimax of Colombia, we act against money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction.

What is money laundering?

It is the process by which criminal organizations seek to give an appearance of legality to resources generated from their illicit activities. Likewise, Article 323 of the Colombian Penal Code establishes the conditions under which money laundering may occur.





What is terrorist financing?

Providing, collecting, delivering, receiving, managing, contributing, safeguarding, or storing funds, assets, or resources, or carrying out any other act that promotes, organizes, supports, maintains, finances, or economically sustains organized crime groups, illegal armed groups or their members, national or foreign terrorist groups, national or foreign terrorists, or terrorist activities.

What is the financing of the proliferation of weapons of mass destruction, or FPWMD?

It is any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, movement of materials, breaking down, transport, transfer, storage, or dual use for illegitimate purposes, in contravention of national laws or international obligations, when the latter are applicable.



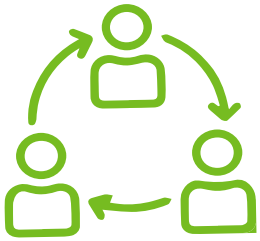
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Responsibilities of suppliers, customers, and third parties

Implement and adhere to internal policies that comply with applicable laws and regulations to prevent illicit activities. This includes having clear procedures for identifying and managing risks related to money laundering, terrorist financing, and the proliferation of weapons of mass destruction.



Provide regular training to employees on how to identify and manage risks associated with money laundering, terrorist financing, and the proliferation of weapons of mass destruction. Promote a culture of compliance and business ethics in all operations.



Collaborate with other companies, suppliers, customers, and authorities in the prevention and detection of illicit activities. Facilitate communication and the exchange of relevant information to strengthen prevention and response measures.





Verify the identity and legitimacy of customers, suppliers, and business partners. Conduct appropriate due diligence to ensure that all parties involved in transactions and business relationships are not linked to illicit activities.



Establish and maintain effective internal controls to prevent and detect activities related to financial crimes. This includes conducting internal and external audits to ensure ongoing compliance and identify potential vulnerabilities.



Ensure that all activities and transactions comply with current laws and regulations related to the prevention of money laundering, terrorist financing, and the proliferation of weapons of mass destruction.

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What are the risks associated with ML/TF/FPWMD?

Possibility of loss incurred by the Company due to disrepute, a poor image, or negative publicity, whether true or not, regarding the organization and its business practices, which may cause loss of customers, decreased income, or legal proceedings.

Possibility of loss that the Company may suffer, directly or indirectly, due to an action or experience of a counterparty.



Possibility of incurring losses due to deficiencies, failures, or inadequacies in human resources, processes, technology, infrastructure, or due to the occurrence of external events.

Possibility of loss incurred by the Company when it is sanctioned or required to compensate damages as a result of non-compliance with rules or regulations and contractual obligations.

What is a red flag?

A red flag is an indicator suggesting that an activity, transaction, or behavior could be related to illicit activities, such as money laundering, terrorist financing, or the proliferation of weapons of mass destruction. Red flags are not definitive proof of criminal activity, but they are situations that require deeper and more careful analysis to determine whether a real risk exists.

Examples of red flags

Money movements that do not match a customer's usual financial profile, such as transfers of large sums of money without a clear justification.

Companies that constantly change owners, shareholders, or legal structures without any apparent logical or commercial reason.

Unusually complex business structures that appear designed to conceal the identity of the ultimate beneficial owners.

A customer or supplier who prefers to make significant cash payments, especially when that is uncommon in their type of business.

Transactions involving jurisdictions known for their lack of financial transparency or for being money laundering havens.

What is an ultimate beneficial owner?

According to External Circular 100-000016 of December 24, 2020, issued by the Superintendence of Companies in Colombia, the ultimate beneficial owner refers to the natural person who, directly or indirectly, owns, controls, or significantly benefits from an entity, business, or transaction. This concept is key to corporate transparency, as it makes it possible to identify the individuals who exercise control or benefit economically, beyond whatever corporate or legal structures may be in use.

A natural person is considered an ultimate beneficial owner if he or she directly or indirectly holds 5% or more of a company's capital or has equivalent control over its voting rights or management.

Why is it important to identify the ultimate beneficial owner?

Criminal organizations have developed various methods over time to conceal information about Ultimate Beneficial Owners, allowing organizations to be used as instruments to give an appearance of legality to illicit funds derived from ML/TF/FPWMD.

How to identify an ultimate beneficial owner?

Some tools that help when identifying an ultimate beneficial owner are:

- Customer, supplier, and third-party onboarding forms.
- Formally requesting the ownership structure from the counterparty.
- Requiring the counterparty to provide the company's certificate of existenceand legal representation.
- Searches in public databases and technological tools that allow identificationof the company.

Responsibilities:

- ✓ Submit and/or update in a timely manner any documentation requested by Sanimax of Colombia during the provision of the service.
- ✓ Maintain the confidentiality of all information accessed during the provision ofthe service.
- ✓ Complete the forms required by Sanimax and provide the information necessary for the provision of the service.

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What is an unusual, attempted, and suspicious ransaction?

Unusual transaction

An unusual transaction is one that, although not necessarily illegal, presents atypical or uncommon characteristics compared to the usual profile of a customer, supplier, or third party. These transactions do not fit the normal activities of the person or company involved and therefore require additional analysis to determine their legitimacy.

Attempted transaction

An attempted transaction is one that a person or entity has tried to carry out, but which has not been completed. This may be due to the intervention of the organization's internal control system, an employee's refusal to proceed with the transaction, or the cancellation of the transaction by the customer before its completion.

Suspicious transaction

A suspicious transaction is one that, due to its characteristics or circumstances, raises reasonable suspicion that it may be related to illicit activities such as money laundering, terrorist financing, or the proliferation of weapons of mass destruction. Unlike an unusual transaction, a suspicious transaction has a greater likelihood of being linked to illegal activities.

Reporting process:

To file a report, please contact us through the following channels:



ONLINE

Visit the website **www.clearviewconnects.com,** where you must enter the Company name Sanimax.

BY PHONE

Call the toll-free number **01800-518-9364**, where you may choose to speak with an advisor or leave a voicemail message.

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Guidance Request

Please remember that you have the support of the Risk and Compliance Department to address any questions that may arise when filing your report. For this purpose, the email address **lineaetica@sanimax.com.co** has been made available to resolve your concerns.

We invite you to review our SAGRILAFT Manual. If you would like to obtain a copy, you only need to request it by email at **cumplimientolegal@sanimax.com.** We will be pleased to provide you with the document and answer any questions you may have

What is PTEE?

Business Transparency and Ethics Program

Its purpose is to publicly declare the organization's commitment, as well as that of its senior management, to ethical conduct, acting under regulatory compliance and a philosophy of zero tolerance toward unethical acts.



At Sanimax of Colombia, we act against bribery and corruption

According to the Business Transparency and Ethics Program (PTEE), the terms transnational bribery, corruption, and facilitation payments refer to practices that undermine integrity and ethics in business. These concepts are essential to understanding the risks that companies must mitigate to comply with anti-corruption regulations and promote a transparent business environment.

What is transnational bribery?

This term refers to the act of offering, giving, receiving, or soliciting a bribe to influence a person's conduct in a business setting operating at the international level. In other words, it involves bribes that cross national borders and may entail the corruption of officials or employees in different countries. The objective is to secure improper benefits or advantages through corrupt means.





What are facilitation payments?

Facilitation payments are small payments or bribes made to public officials or employees so that they perform routine or administrative tasks that should be carried out as part of their normal duties without any additional charge. These payments are usually smaller than large transnational bribes, but they are still illegal and are intended to expedite processes or ensure that basic services are provided when they should not involve any extra cost.

What is corruption?

In general terms, corruption is the abuse of power for personal gain or undue advantage. This may include bribery, nepotism, fraud, and other corrupt practices that affect the integrity of processes and decisions, both in the public and private sectors. In the context of the PTEE, corruption is conduct that must be prevented and sanctioned to maintain high ethical and legal standards.



¡Bribery is not only about money!

The following are the most common forms of bribery:

- Giving gifts.
- Paying for entertainment expenses or services.
- Political contributions.

Bribery is a corrupt practice consisting of offering, promising, giving, requesting, or receiving something of value for the purpose of improperly influencing the actions, decisions, or obligations of a person who holds a position of trust or authority, whether in the public or private sector. The purpose of bribery is to obtain an unlawful advantage or to favor private interests to the detriment of the common good and legality.

At Sanimax of Colombia, we do the right thing, and that is our most valued principle. Together, we reject bribery and corruption, building a future in which success is achieved through ethics, transparency, and responsibility.

Responsibilities of suppliers and customers regarding corruption and bribery (C/B)

01 Suppliers, customers, and contractors must commit to complying with all applicable national and international anti-corruption and anti-bribery laws and regulations, including Law 1778 of 2016, which regulates transnationalbribery in Colombia.

02 It is vitally important that, although some counterparties may not be legally required to comply with a PTEE under regulatory requirements, they should nevertheless have clear ethics and compliance policies that include measuresto prevent money laundering and other financial crimes, and that companiesrequired to adopt this system do so rigorously.

03 Counterparties must conduct due diligence to confirm that beneficiary organizations are not involved in illicit activities and do comply with local and international regulations.

04 Counterparties must consider facilitation payments made to public officials orothers for the purpose of expediting administrative processes or obtaining permits for a particular benefit to be a corrupt and sanctionable practice.Likewise, counterparties must have clear procedures to identify, prevent, andreport any attempted facilitation payment.

05 Counterparties must ensure that the gifts and gratuities offered are not inappropriate and do not seek to obtain an improper advantage in business decisions.

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What is a conflict of interest?

A conflict of interest occurs when a person, whether an employee, executive, or any other party involved in an organization, has personal or financial interests that could interfere with his or her ability to make impartial decisions in the best interest of the company. This conflict may compromise the integrity of business decisions and affect trust in the organization.

A conflict of interest does not always imply that wrongdoing has been committed, but the mere appearance of a conflict may be harmful, which is why it is crucial to identify and manage it properly.

How can a conflict of interest be avoided?

- Report conflicts of interest and situations in which a lack of objectivity, independence, or impartiality is observed.
- Refrain from acting when circumstances arise that may constitute a conflict of interest.
- Do not seek privileges, undue personal benefits, or engage in actions based on favoritism, nepotism, or patronage.

Some examples of red flags for corruption and bribery (C/B)

- ✓ When a counterparty carries out high-volume transactions, unnecessarily complex transactions, or transactions that do not fit the usual profile of its business.
- ✓ If the counterparty does not provide complete or accurate information about its identity, business activity, source of funds, or corporate structures, this may be a red flag.
- ✓ The use of multiple shell companies or complex legal structures without a clear business reason may indicate an attempt to conceal the identity of the real beneficiaries or to manipulate the traceability of funds.
- ✓ Counterparties that cannot adequately explain the origin of their funds, especially in large-sum transactions, may be involved in illicit activities such as money laundering.
- ✓ Establishing business relationships with persons or entities located in countries with high levels of corruption, terrorism, or lack of transparency.
- ✓ Relationships with counterparties that do not provide complete information about their activities or that insist on excessive confidentiality regarding their transactions.

We invite you to review the duties of our suppliers, customers, and third parties in the Supplier and Customer Code of Conduct.

C/B Reporting Process

To file a report, please contact us through the following channels:



ONLINE

Visit the website **www.clearviewconnects.com,** where you must enter the Company name Sanimax.



BY PHONE

Call the toll-free number **01800-518-9364,** where you may choose to speak with an advisor or leave a voicemail message.

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