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SEMPERTEX GROUP decided to implement the Policy for the Prevention of Money Laundering, Terrorist Financing, and the Proliferation of Weapons of Mass Destruction. It is understood that no member of the SEMPERTEX GROUP team may deviate from these policies. No circumstance can justify a violation of these policies.

POLICY FOR THE PREVENTION OF MONEY LAUNDERING, FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

It is SEMPERTEX GROUP DE COLOMBIA's policy not to allow and actively prevent any activity that facilitates money laundering, financing of terrorist or criminal activities, or proliferation of weapons of mass destruction in all of its operations, in strict compliance with all applicable requirements, according to the laws of the Republic of Colombia, its Regulatory Decrees, and implementing Resolutions. As a result, SEMPERTEX GROUP's objectives are supported by strict adherence to the self-control rules and comprehensive risk management Prevention of Money Laundering, Terrorist Financing.

Our policies, procedures, and controls for the prevention of Money Laundering and Terrorist Financing are designed to ensure compliance with the regulations issued by the Superintendence of Corporations, the National Tax and Customs Division, and related applicable standards, and will be reviewed and updated at least once every two (2) years to ensure their validity over time, taking into account changes in regulations and business changes.

PREVENTION OF MONEY LAUNDERING, TERRORIST FINANCING RISK MANAGEMENT POLICY

SEMPERTEX GROUP's risk management policy is based on the implementation of a risk management system that recognizes risks, allows them to be evaluated, and develops strategies and tactics to mitigate the identified risks.

The Compliance Officer and a group of experts assigned to each business area shall analyze the environment systematically and periodically, at least once every two (2) years, to identify risk situations related to money laundering, financing of terrorism, and financing of the proliferation of weapons of mass destruction. The alerts, follow-ups, and internal information gathered will be used to update and improve the risk situations identified.

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The Compliance Committee's follow-up should enable adjustments to the self-monitoring and comprehensive prevention of money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction risk management system, as well as decisions on related risk situations.

POLICY FOR OPENING NEW MARKETS OR LINES OF BUSINES

SEMPERTEX GROUP will continue to dynamize its market of products and services for which, within the planning cycle and consistent with the risks and risk factors defined by the organization and the law, during the study prior to the launch of a new market or new line of business, SEMPERTEX GROUP will identify situations of prevention of money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction risk involved, define the control activities, and leave a documentary record of the corresponding analysis.

POLICY ON DUE DILIGENCE ON KNOWLEDGE OF COUNTERPARTIES

It is SEMPERTEX GROUP's policy to conduct profitable, sustainable, and socially responsible businesses, and due diligence in the knowledge of its counterparties is a critical component to ensuring that its business partners are not involved in illicit activities that could jeopardize its commercial interests, financial stability, and operational effectiveness.

For the purposes of this policy, due diligence is defined as the process of identifying the counterparty (collaborators, partners, shareholders, administrators, clients, suppliers, contractors, and so on), which entails making reasonable, structured, and consistent efforts to gain adequate knowledge of the markets in which the Counterparty operates and of the activities developed by the Counterparty, as well as knowledge of the final beneficiaries and/or controllers of the respective transactions; for such purposes, the available tools are used to determine the true identity and effective ownership of the business proceeds, the source of funds used by the counterparty, the nature of the business, and the reasonableness of the operations in relation to the counterparty's business; this allows SEMPERTEX GROUP to manage its risks prudently and in accordance with the law.

In accordance with the PAD-01 Due Diligence procedure, the business partner verification process shall be applied to any natural or legal person, customers and/or suppliers with whom a commercial relationship is established that is expected to be maintained over time and in a direct manner. This guide applies to e-commerce only when a warning signal is detected over time in accordance with the provisions of procedure PAD-01 Due Diligence.

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The information gathered from the business partner in order to initiate an employment, commercial, corporate, or other type of relationship must be treated confidentially, with special emphasis on the Personal Data Protection Act or the European Union's "General Data Protection Regulation" (GDPR).

Following approval of the SEMPERTEX GROUP evaluation process, the counterparties may be linked and registered as suitable and appropriate to begin a commercial, labor, or corporate relationship with the company.

In the case of suppliers and contractors, SEMPERTEX GROUP conducts the analysis to ensure that the prices of goods and services are in line with the market, as well as any other analysis that may be required to avoid a possible contagion of its operations caused by eventual illegal activities of its counterparts. Suppliers are chosen and evaluated in accordance with the provisions of procedure PGS-02 Selection, Evaluation, and Re-evaluation of Business Partners (Suppliers).

SEMPERTEX GROUP will make every effort to know the counterpart in the case of purchases where the full identification of the supplier is complex, as well as in the case of large sales. The following aspects will be given special consideration:

- ✓ That the products are the result of legal activities;
- ✓ That they were duly nationalized;
- ✓ That they are not smuggled or restricted sale products, and that they have the necessary authorizations or licenses if they are.

In any case, SEMPERTEX GROUP will verify in the sites suggested on the Superintendence of Companies' web page for the purposes of Counterparty knowledge and list consultations, in accordance with the guidance, orientation, and duties imposed by the Superintendence of Companies in the Basic Legal Circular, Chapter X.

Similarly, the restrictive lists issued by national and foreign authorities that are binding on Colombia, such as those prepared by the United Nations Security Council and its various Sanctions Committees, will be consulted on a regular basis (depending on the risk category of the counterparty).

SEMPERTEX GROUP will make reasonable verification of the counterparty in sales or international transactions that do not require the physical presence of the parties and will use the International Transparency Indexes (Anti-Corruption) and the Basel Indexes (AML/CFT Provisions) as a reference for periodic reviews for the segmentation of these customers.

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Furthermore, SEMPERTEX GROUP may, at its discretion, schedule visits to international jurisdictions in order to better understand the counterparty.

A formal business relationship will be established whenever possible, and in order to avoid payments from unidentified accounts, SEMPERTEX GROUP will request documentation to ensure a reliable source of payment received.

SEMPERTEX GROUP will not enter into commercial relationships with clients, collaborators, suppliers, or third parties who are on the Colombian binding list, the OFAC restrictive list, or any other restrictive list.

ENHANCED DUE DILIGENCE

Wherever there is a high risk of money laundering, terrorism financing, and the proliferation of weapons of mass destruction, an intensified due diligence must be performed in the execution of a commercial agreement with a Business Partner, increasing the rigorousness of the counterparty's knowledge. This increased due diligence must provide SEMPERTEX GROUP with a thorough understanding of the counterparty and its beneficial owner.

Due diligence will be increased in the following areas:

- Business partners with PEP status.
- Business partners from non-cooperating countries.
- Business associates or prospective business associates identified on local or international lists or databases as having a potential link to smuggling activities, public corruption, transnational corruption, drug trafficking, terrorism, or any other crime that is the source of prevention of money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction.

SEMPERTEX GROUP will conduct a risk analysis for these business partners, and the Compliance Committee will determine the appropriate course of action based on the impact of risk materialization.

SEMPERTEX GROUP will investigate the behavior of natural or legal persons with whom it has a business relationship who have been identified in negative or adverse news or who have been convicted. The compliance officer will determine the frequency of these reviews based on the risk established for each third party as a result of the due diligence process.

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All business partners with an active relationship with SEMPERTEX GROUP will be reviewed at least once a year.

CASH HANDLING POLICY

SEMPERTEX GROUP does not allow its collaborators to accept cash transactions of any size. In the rare and sporadic cases where a cash transaction is required, it must be approved by the area manager and reported to the Commercial Vice-Presidency. The only recurring cash management permitted in SEMPERTEX GROUP is for the management of the company's internal petty cash, the amount of which is assigned annually by the Financial Management and approved by the Administrative and Financial Vice-Presidency, and whose reimbursement must be supported by the appropriate invoices and/or petty cash receipts as specified by the accounting area.

VIRTUAL ASSET MANAGEMENT POLICY

SEMPERTEX GROUP does not accept transactions involving virtual assets.

MASS SALES POLICY

SEMPERTEX GROUP requires its customers who make large purchases through the ecommerce channel to perform a minimum amount of due diligence, which includes obtaining the customer's name and identification number. The above is based on the typical amounts involved in these types of transactions and the risk they pose to the company. Considering the impossibility of performing an exhaustive due diligence process for all customers of the mass electronic sales channel, SEMPERTEX GROUP will join efforts in identifying unusual operations by these customers and will concentrate its efforts in knowing the origin of the resources, verifying and confirming identity and contact data, and their economic activity through any legal means.

DOCUMENT RETENTION GUIDE

SEMPERTEX GROUP must document all verifications performed, including all identifying information provided by a business partner, the methods used and the verification results, and the resolution of any discrepancies discovered during the verification process.

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In general, the following documents must be retained in light of this guide:

- The system of self-monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction manual, including annexes and a risk assessment.
- The risk matrix.
- Documentation of due diligence for the counterparty's knowledge.
- Documents and evidence pertaining to any reported red flags, attempted transactions, unusual transactions, or suspicious transaction reports.
- OdC reports to the unit leader and the Legal Representative.
- system of self-monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction reports to the President and/or the Compliance Officer (Statutory Auditor, Internal Audit, Super Sociedades, DIAN, and any other).
- All documents used with system of self-monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction have been updated.
- Disciplinary procedures are carried out in the event of non-compliance with the execution of controls and other system of self-monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction provisions.
- Plans and programs for system training and dissemination, including materials, attendance lists, and system effectiveness evaluations.

In particular, the documents used with the counterparty's knowledge must be kept for the duration of the civil, commercial, labor, or corporate relationship and for a minimum of ten (10) years (in accordance with the provisions of Article 28 of Law 962 of 2005, or the rule that modifies or replaces it), after which the documents may be destroyed, subject to the following terms and conditions:

- That no applicable civil, labor, corporate, or commercial rule requires preservation for a period longer than that specified above.
- That they were not requested by the appropriate authority.
- That they are stored in a technical medium that ensures their subsequent accurate reproduction as well as the preservation of their evidentiary value.

SEMPERTEX GROUP will lift the confidentiality of the information used with the system of self- monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction only in response

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to specific requests from competent authorities, in accordance with legal requirements and forms, and in the cases specified by the norms.

Without the prior approval of the Legal Representative, no SEMPERTEX GROUP collaborator is authorized to disclose information inherent in the design and operation of the self-control and integral risk management system LAFT.

EDUCATION AND TRAINING POLICY IN THE SYSTEM OF SELF- MONITORING, PREVENTION AND RISK MANAGEMENT AGAINST MONEY LAUNDERING, FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

In light of the comprehensive LAFT risk, SEMPERTEX GROUP's policy is to develop ongoing training for collaborators in critical positions, with training and education conducted under the guidance and responsibility of the Compliance Officer and promoted by senior management.

The Education program will be held at least once a year and will be updated as needed to reflect any new legal developments. This information will be included in the annual training program for the company. At a minimum, education and training sessions will include:

- (1) Recognizing red flags that arise while performing collaborator duties;
- (2) Risk identification, including how, when, and to whom to escalate unusual collaborator activity or other red flags for analysis and reporting of Attempted Transactions or Suspicious Transactions;
- (3) Associate roles and responsibilities in system of self-monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction compliance efforts;

WARNING SIGNS

According to SEMPERTEX GROUP's system of self-monitoring, prevention and risk management against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction compliance program, monitoring, investigation, and control of warning signals is a critical component to ensuring the effectiveness of risk management of LA/FT/FPADM.

Atypical situations are presented by operations that may conceal money laundering, terrorism financing, and the proliferation of weapons of mass destruction. It should be noted that not all operations exhibiting atypical and unusual behavior are illegal operations;

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thus, identifying warning signs does not imply that the operation must be immediately and automatically reported to authorities as suspicious. It is important to remember that the warning signal only facilitates the identification of an operation that may correspond to the processes typical of the various methods used by criminals for money laundering, financing of terrorism, and financing of the proliferation of weapons of mass destruction.

There is a list of different warning signs about the methods used by criminals for their LA/FT/FPADM operations in the format F02-PAD-02 Report of Unusual Operations, so that SEMPERTEX GROUP collaborators can detect a warning sign or an unusual operation and report it immediately through this document.

The Compliance Officer is in charge of receiving reports from SEMPERTEX GROUP collaborators, as well as providing the necessary support, in order to advance the analysis with the process leaders. In the event of a doubt, the CCO shall request additional information in order to further investigate the warning signal and the counterpart's knowledge. Check the profile and typical characteristics of the counterparty to ensure knowledge of the counterparty.

Any collaborator who reports an unusual operation or warning signal must keep in mind that the information is confidential and may not be communicated or informed to anyone other than the Compliance Officer and his or her immediate supervisor.

CONFLICT OF INTEREST POLICY

SEMPERTEX GROUP is an organization whose leaders actively work to create an ethical culture in business activities, in which employees develop their functions correctly, based on ethical principles, and supported by the Integral Management Policy and the SEMPERTEX GROUP Code of Ethics and Business Conduct.

Relationships with collaborators, clients, and other stakeholders at SEMPERTEX GROUP are built on transparency and mutual trust. As a result, before making a decision, our collaborators must confront ethical quandaries with criteria and inform their superiors.

In particular, collaborators must always avoid conflicts of interest in business transactions and counterparty knowledge procedures.

As a result, they must recognize that there is a conflict of interest in the analysis of warning signals, unusual operations, and the study of suspicious operations when they are carried out by spouses or permanent partners, relatives within the second degree of consanguinity, second degree of affinity, or first civil degree, or when the person in charge of carrying out the analysis has a personal interest or seeks to favor.

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Similarly, a conflict of interest is recognized when the decision to perform the counterparty analysis involves the person performing the analysis's personal circumstances, or when the operations are carried out by spouses or permanent partners, relatives within the second degree of consanguinity, second degree of affinity, or first civil relationship.

Situations involving a potential conflict of interest must be documented and escalated to the higher management level of the unit in which the employee works in order for a final decision to be made in an informed and transparent manner.

The mere failure to report a (potential or actual) conflict of interest is considered serious misconduct.

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