

SAGRILIFT Grupo Roldan (anti-money laundering and counter-terrorism financing system)



Grupo Roldan is firmly committed to carrying out a proactive management of ML/TF/APA risks, as a strategic process within the organization, which encompasses all activities carried out in the development of its main social purpose. For this reason, we commit to the implementation, maintenance, and continuous improvement of the System for Self-Control and Comprehensive Management of ML/TF/APA risks, for their effective prevention, in accordance with current applicable legal regulations. In accordance with the commitment outlined by Grupo Roldan, and with the purpose of complying with it, the company adopts the following policies for the management of ML/TF/APA risks.

Políticas (guidelines)

- Shareholders, directors, employees, and contractors of the Company must always act with a preventive attitude towards ML/TF/APA risks to which the company may be exposed, always informing the Compliance Officer of all unusual operations of which they become aware.
- The Company, through its Compliance Officer, commits to confirming and documenting the true identity of shareholders, employees, contractors, clients, or suppliers and will exercise enhanced due diligence on individuals or legal entities from whom there is information linking them to ML/TF/APA crimes or who are considered to represent a higher risk of engaging in these behaviors.
- The Company will refrain from negotiating with those who provide false information or are reluctant to provide information or submit the documentation required to verify the source of their funds, or who, upon the company's request, fail to justify the lawful origin of their resources.
- The Company will not establish relationships with individuals who, after being checked against the binding lists for Colombia, are found to be reported in any of them for source crimes or crimes related to ML/TF/APA, in accordance with international law. In the event that this occurs, the respective authorities must be informed.
- The Company will not establish relationships with individuals who have been convicted of source crimes or crimes related to ML/TF/APA, sanctioned with imprisonment.
- The Company will not establish relationships with individuals who provide fictitious or inaccurate names or violate the Company's policies or procedures for engagement.
- The Company will not accept transactions involving virtual assets. However, this is a situation that may be studied by the Board of Directors, with a decision recorded in the minutes, evaluating all possible risks to which the Company could be exposed.
- The Company will not establish relationships with individuals intending to carry out operations involving a high volume of cash, without apparent justification, or with those offering to buy or sell movable or immovable

property at prices considerably different from market prices, without valid justification.

- Individuals who are part of the Company must prioritize the interests of the organization over personal or third-party interests, avoiding conflicts of interest that may cloud their judgment when making relevant decisions for the Company. Therefore, operations that involve conflicts of interest that may favor personal or professional interests are not allowed. In the event of a conflict of interest, the interest of the company will always prevail.
- It is the duty of all individuals who are part of the company to report to their superiors or the designated person any situation of conflict of interest in which their judgment may be affected by their relationships with clients, suppliers, shareholders, employees, or beneficiaries of donations.
- The Company has channels enabled for reporting unusual transactions by all stakeholders. When any party becomes aware of information considered as an alert signal, immediate notice must be given to the Compliance Omcer, who will verify the information and, if evidence exists, send the reports to the competent authority.
- The Company does not make or receive payments with high volumes of cash (greater than fifteen million pesos (\$15,000,000)), nor does it engage in transactions with assets or any type of virtual currency unless authorized by the Board of Directors.
- Cash payments will not be made to steel and aluminum suppliers, nor to employees and service providers for payroll purposes.
- The Company commits its staff to attend training on the Self-Control System and Management of ML/TF/APA Risks convened by the Compliance Omcer, who will define an annual training plan.
- The responsibility for archiving, safeguarding, and preserving documents that are part of the ML/TF/APA Risk Management System lies with the Compliance Omcer. Documents must be stored in a location that facilitates their location and ensures confidentiality for at least 10 years.
- The Company will establish an annual communications plan that includes the disclosure of the ML/TF/APA Risk Management System to other stakeholders, at least once a year, so that all stakeholders are able to identify what constitutes an Unusual Operation or a Suspicious Operation, and the content and form in which it should be reported, among other aspects.
- The Company protects the information disclosed by its clients, suppliers, employees, shareholders, and other third parties. This information includes that disclosed by competent authorities through investigations into the actions of any counterparty, as well as reports of Unusual and Suspicious Operations.

Canales de comunicación

All alert signals, unusual transactions, suspicious transactions, or behaviors deemed relevant to ML/TF/APA risks may be reported personally to the Compliance Omcer through written communication or via email at oficialcumplimiento@gruporoldan.com.co. The ethics hotline on the Grupo Roldan website is also enabled for this purpose.

