



SELF-CONTROL AND RISK MANAGEMENT POLICY FOR ASSET LAUNDERING AND TERRORIST FINANCING (AL/TF)



1. OBJECTIVE:

This policy aims to establish and maintain a Self-Control and Comprehensive Risk Management System for Asset Laundering, Terrorist Financing, and the Financing of Proliferation of Weapons of Mass Destruction (SAGRILAF) within Alianza Team (the "Company"). Its objective is to ensure the Company provides and manages the necessary technical, logistical, and human resources for this system. The SAGRILAF system is designed with a risk and materiality approach, specifically tailored to the Company's characteristics, to implement reasonable measures that prevent its misuse for AL/TF/FPADM activities.



2. SCOPE:

This corporate policy has received approval from the Board of Directors. It extends to all Alianza Team companies globally, encompassing every entity within the corporate group where Team Foods Colombia S.A. functions as the parent and controlling entity.

This policy's scope can be expanded to include any other individual connected to the Company if the nature of their relationship means their actions could damage the Company's reputation or expose it to crimes related to AL/TF/FPADM.

This document's guidelines apply to the Company, its management, administration, control bodies, employees, and all individuals involved in the planning, authorization, execution, and review of operations with clients, suppliers, employees, and shareholders. These guidelines are in accordance with Circular 100-000016 of December 24, 2020, from the Superintendence of Corporations (which comprehensively modifies Chapter X of Basic Legal Circular No. 100-000005 of 2017), Decree 830 of 2021, External Circular No. 100-000004 of April 9, 2021, Circular 100-000015 of 2021, Law 2195 of 2022, and any other regulations that complement, modify, or supersede them.



3. ASSOCIATED RISK(S):

1. **Legal risk.**

2. **Reputational risk.**

3. **Operational risk.**

4. **Contagion risk.**



4. DEFINITIONS:

For the purposes of this document, the terms below are defined in accordance with Chapter X of the Basic Legal Circular of the Superintendence of Corporations:

- A. Close Associates:** Refers to legal entities where the administrators, shareholders, controlling entities, or managers are identified as Politically Exposed Persons (PEPs), Foreign PEPs, or PEPs of International Organizations. This definition aligns with Article 2.1.4.2.3 of Decree 1081 of 2015, which specifically lists PEPs.
- B. Ultimate Beneficial Owner:** According to the Tax Statute and related regulations, is the individual(s) who ultimately own or control a client, either directly or indirectly. This includes individuals on whose behalf transactions are conducted, as well as those who exercise effective and/or final direct or indirect control over a legal entity or other non-legal personhood structures.
- C. Counterparty:** This refers to any natural or legal person engaged in commercial, business, contractual, or other legal relationships with the Companies. This includes, but is not limited to, the Companies' Associates, employees, clients, and suppliers of goods and services.
- D. Due Diligence:** This process involves the Company implementing measures to understand the counterparty, their business, operations, products, and transaction volume.
- E. Enhanced Due Diligence:** This process involves the Company implementing additional, more intensive measures to understand the Counterparty, including their business, operations, products, transaction volume, and jurisdiction.
- F. AL/TF/FPADM Risk Factors:** These are the possible elements or causes that generate AL/TF/FPADM Risk for the Company. The Company must identify them by taking into account Counterparties, Products, activities, channels, and jurisdictions, among others. These factors must be considered to identify situations that may generate AL/TF/FPADM Risk in the operations, businesses, or contracts that the economic entity carries out. In accordance with the Circular and for the purposes of this policy, the following will be taken into account:
- G. Counterparty:** Individuals or entities, both natural and legal, that engage in business, contractual, or legal relationships of any nature with the Companies are considered counterparties. This includes, but is not limited to, the Company's associates, employees, clients, contractors, and suppliers of products.
- H. Products:** Goods and services produced, marketed, transformed, offered, or acquired by the Company from a third party.
- I. Terrorist Financing or TF:** This crime, defined in Article 345 of the Colombian Penal Code (or its subsequent modifications), involves the management of funds or assets linked to terrorist activities.

- J. Financing of the Proliferation of Weapons of Mass Destruction or FPADM:** Terrorist financing is defined as any act involving the provision of funds or the use of financial services, entirely or partially, for illicit purposes. These illicit purposes include the manufacturing, acquisition, possession, development, export, trafficking, fragmentation, transportation, transfer, deposit, or dual use of materials, in contravention of national laws or applicable international obligations.
- K. Money laundering:** Is defined as the act of giving an appearance of legality to assets or money derived from activities described in Article 323 of the Colombian Penal Code, or any subsequent modification thereof. This encompasses any action involving the acquisition, safeguarding, investment, transportation, transformation, storage, conservation, holding, or management of assets that originate, either directly or indirectly, from illicit activities.
- L. Unusual Operation:** An operation that, due to its amount or characteristics, does not align with the Company's usual economic activities, or deviates from normal business practices within a specific sector, industry, or type of Counterparty in terms of its number, quantity, or characteristics.
- M. Suspicious Operation:** An Unusual Operation that cannot be reasonably justified by the activity's customs and practices. This includes attempted or rejected operations with suspicious characteristics.
- N. AL/TF/FPADM Risks:** This is the possibility of loss or damage that the Company may suffer due to its propensity to be used directly or through its operations as an instrument for Money Laundering and/or the channeling of resources for the commission of terrorist activities or the financing of the proliferation of weapons of mass destruction, or when the concealment of assets from such activities is intended. The contingencies inherent in AL/TF/FPADM are materialized through the risks of:
 - A. Contagion Risk:** This is the possibility of a loss that a company may suffer, directly or indirectly, due to an action or experience of a Counterparty.
 - B. Legal Risk:** This is the possibility of loss that a company incurs by being sanctioned or forced to compensate for damages as a result of non-compliance with norms or regulations and contractual obligations. It also arises as a result of failures in contracts and transactions, derived from malicious acts, negligence, or involuntary acts that affect the formalization or execution of contracts or transactions.
 - C. Operational Risk:** This is the possibility of incurring losses due to deficiencies, failures, or inadequacies in human resources, processes, technology, infrastructure, or due to the occurrence of external events. This definition includes Legal Risk and Reputational Risk associated with such factors.
 - D. Reputational Risk:** This is the possibility of loss that a company incurs due to disrepute, bad image, negative publicity, whether true or not, regarding the organization and its business practices, which causes loss of customers, a decrease in revenue, or legal proceedings.



5. GENERAL CONDITIONS:

The Company is committed to fair, responsible, and ethical market participation, upholding legality, free competition, and safeguarding consumer and community interests. To achieve this, we have implemented a Self-Control and Comprehensive Risk Management System against Asset Laundering, Terrorist Financing, and Financing for the Proliferation of Weapons of Mass Destruction (SAGRILAFT). This system aims to minimize the company's potential use for AL/TF/FPADM activities and mitigate the negative societal impacts of these crimes, such as market price distortion, unstable economic growth, and corruption.

This declaration affirms our commitment to aligning all practices with the legal frameworks of our operating countries. We reject all other crimes and reprehensible conduct, in adherence to relevant guidelines and this Policy. All Company employees must consult and observe this Policy, prioritizing its observance over the achievement of commercial goals.



6. GUIDELINES:

A) GENERAL GUIDELINES

To ensure the company's business processes are conducted with honesty, ethics, responsibility, respect, loyalty, and irreverence, guided by legality and diligence, the following guidelines have been established.

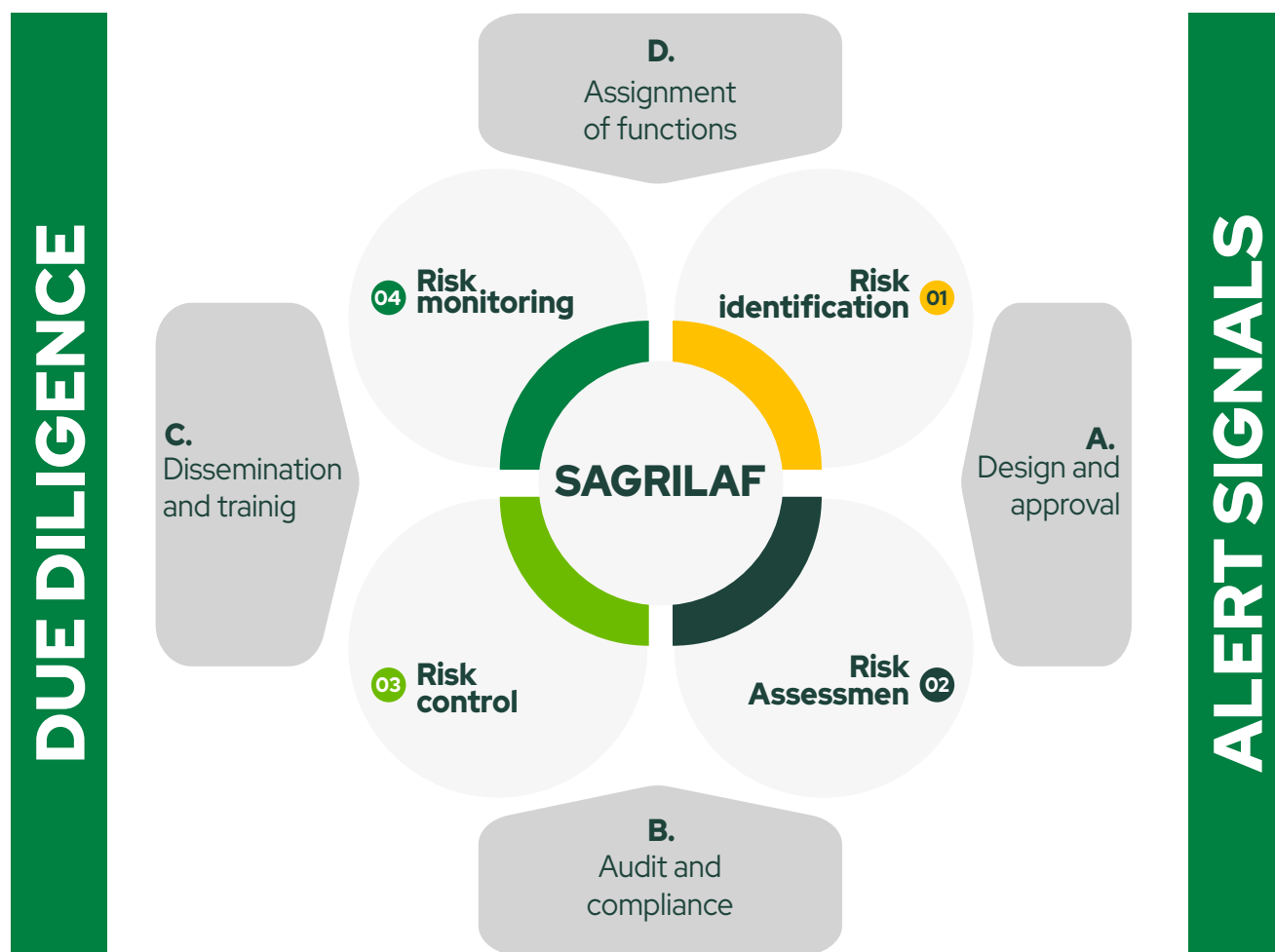
- A Self-Control and Integral Risk Management System for AL/TF/FPADM (SAGRILAFT) will be developed, implemented, and maintained.
- The Company will implement a SAGRILAFT system grounded in a comprehensive risk assessment. This assessment will identify legal, reputational, operational, and contagion risks through risk matrices and other control mechanisms. The system will adhere to the guidelines set forth in Circular 100-000016 of December 24, 2020, from the Superintendence of Corporations, Law 2195 of 2022, and other applicable regulations.
- An annual training program will be promoted for employees on the prevention and control of risks.
- This program, led by the Compliance Officer and the Vice Presidency of Human Talent Development, will use suitable mechanisms for the correct communication and pedagogy of the SAGRILAFT.
- The necessary tools will be implemented for the dissemination of the Company's SAGRILAFT compliance process to the Company's counterparties.
- The Company is committed to fostering a culture where reporting unethical or illegal activities, including those violating SAGRILAFT principles, is encouraged without fear of retaliation. To achieve this, easily accessible and available reporting mechanisms will be implemented.

- The Company shall establish alert signals for operations that deviate from the ordinary course and the usual activity profiles of its counterparties.
- The compliance department will institute measures to regularly assess and confirm the efficacy of its protocols to thwart any acts of AL/TF/FPADM. Furthermore, the department will consider legislative and regulatory amendments in all operational jurisdictions.
- The Company's international business and transaction countries will have the Policy and SAGRILIFT Manual translated into their official languages.
- The Compliance Officer leads and manages the SAGRILIFT, aiming to prevent, detect, and address legal, political, or ethical breaches.
- The Board of Directors, through its presidency committee, is responsible for providing the Compliance Officer with the necessary economic, human, and technological resources to carry out their duties effectively.
- The Compliance Officer is granted access to all essential tools, information, and documents required to fulfill their duties. Accordingly, all administrative, management, and control departments are mandated to furnish any information they request.
- The Compliance Officer must maintain independence to avoid any conflicts of interest or incompatibilities that could hinder the proper execution of their duties.
- Team leaders are responsible for ensuring their own compliance, as well as that of their direct reports, with all regulations, policies, and procedures established by authorities and the Company to prevent activities related to AL/TF/FPADM.
- Due diligence is a fundamental principle in understanding all of the Company's counterparties.
- The Company and its counterparties will promote legality in any environment in which they carry out their activities.
- The Company will submit monthly reports to the Financial Information and Analysis Unit (UIAF), attached to the Ministry of Finance, in order to monitor Suspicious Operations Reports (ROS), where there are abnormal practices that have no reasonable justification, Unusual Operations that do not fall within the normal patterns of business, and Cash Transaction Reports that exceed COP \$10,000,000 individually or on different occasions that total COP \$50,000,000 or more.
- The company guarantees adherence to this document by incorporating SAGRILIFT clauses into all contracts and forms. Furthermore, it mandates the acceptance of the Supplier and Contractor Code during the onboarding and updating procedures for all counterparties.
- Contractors and counterparties engaging in illegal acts or acts violating this policy may face severe consequences, including investigations, immediate contract termination, and liability for damages incurred by the Company. Additionally, such actions could lead to potential lawsuits, further investigations, and reports to the Colombian Government and other relevant governments where the Company operates.

- Regarding archiving and documentation for due diligence and relationship linkage, the Company adheres to the longest timeframe stipulated by Article 28 of Law 962 of 2005 and Paragraph 1 of Article 12 of Law 2195 of 2022. Consequently, it will archive all documentary support for a period of ten (10) years from the final date of relationship termination or commercial transaction completion.
- All activities related to the implementation and execution of SAGRILAF will be documented and permanently archived.

B) STRUCTURE OF THE SELF-CONTROL AND INTEGRAL RISK MANAGEMENT SYSTEM FOR AL/TF/FPAM

The SAGRILAF has the following elements and stages:



Elements of SAGRILIFT:

A. Design and Approval:

The SAGRILIFT's design must reflect the Company's unique characteristics, activities, and materiality. This includes identifying, individualizing, and evaluating its AL/TF/FPADM Risk Factors. Based on this evaluation, the Company will implement the necessary operational, economic, physical, technological, and resource measures to ensure the SAGRILIFT's effective implementation.

B. Audit and Compliance:

The Board of Directors is responsible for appointing a Compliance Officer. This individual will be tasked with auditing and verifying adherence to SAGRILIFT. The Company, its legal representative, and the Board of Directors must provide the necessary operational, economic, physical, technological, and resource measures to ensure the proper execution of SAGRILIFT's audit and compliance functions.

C. Dissemination and Training:

The Company implements an annual training plan to ensure SAGRILIFT is understood and integrated into the culture of all relevant stakeholders and those responsible for its implementation.

D. Function Assignment:

The Company will clearly delineate responsibilities for executing the various stages, elements, and activities associated with SAGRILIFT.

Now, the AL/TF/FPADM risks are identified during the different stages of the SAGRILIFT in the following way:

A. Identification of AL/TF/FPADM Risk:

The Company must classify the AL/TF/FPADM risk factors, according to its economic activity and its materiality, as well as the methodology to identify the specific AL/TF/FPADM risk, and the conditions of time, manner, and place, the relevance, and the priority with which the Due Diligence measures must be executed.

B. Measurement or Assessment of AL/TF/FPADM Risk:

The Company will establish the methodology for the measurement or assessment, to determine the possibility or probability of occurrence of AL/TF/FPADM risks, as well as the impact if they materialize. The AL/TF/FPADM risk will also be evaluated when entering new markets or offering new products.

C. Risk Control:

The Company is required to implement reasonable measures through SAGRILIFT to control its inherent risk exposure. This involves establishing methodologies for these measures, which should

lead to a reduction in the likelihood or impact of AL/TF/FPADM Risk. Additionally, controls and tools for detecting unusual and suspicious operations must be developed.

D. Risk Monitoring:

The SAGRILAF is crucial for enabling the Company to monitor its risk profile. It facilitates the detection of unusual and suspicious operations and supports a continuous, effective follow-up process. This process ensures the rapid identification and correction of any SAGRILAF deficiencies.

C) ASSIGNMENT OF FUNCTIONS

The Company recognizes that the interaction of all involved parties is essential for the proper design, operation, implementation, execution, compliance, and overall effectiveness of SAGRILAF.

In particular, the senior management officials play a crucial role as promoters of the ethical and legal culture, and their functions are highlighted as follows:

A. Board of Directors:

As the main administrative body, the Board of Directors is responsible for the implementation and effectiveness of the SAGRILAF. This includes establishing an organizational structure that supports these goals, approving SAGRILAF policies and their updates, and allocating the necessary technical, logistical, and human resources. Furthermore, the Board is responsible for issuing statements on reports concerning SAGRILAF's implementation and operation.

B. President:

As the primary representative of corporate governance and the Board of Directors, the President is responsible for ensuring the Company has sufficient personnel and resources to effectively implement SAGRILAF and other compliance programs. This must be done in accordance with the Compliance Officer's recommendations, the Superintendence of Corporations, and all applicable regulations.

C. Legal Representative (in Compliance Matters):

Must provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the SAGRILAF. This includes collaborating with the Compliance Officer to present the SAGRILAF proposal and its updates to the Board of Directors for approval. Additionally, the individual must efficiently allocate the technical and human resources as determined by the Board of Directors.

D. Compliance Officer:

Must ensure the effective, efficient, and timely compliance of the SAGRILAF. This involves active participation in the design, direction, implementation, auditing, compliance verification, and monitoring of the program. Reports must be submitted to the Board of Directors at least annually, and the adoption of corrections and updates to SAGRILAF should be promoted.

E. Vice Presidents, Country Managers, and Business Unit Directors:

They are responsible for ensuring their own compliance, and that of their employees, with all regulations, policies, and procedures established by authorities and the Company to prevent activities associated with AL/TF/FPADM Risk.

F. Employees:

Employees are expected to adhere to all applicable laws, regulations, and company policies. These Policy Guidelines serve as a framework, ensuring their conduct reflects integrity and promotes compliance with SAGRILIFT principles.

G. Other Counterparties:

Suppliers, clients, contractors, and other Counterparties are mandated to comply with all pertinent laws, regulations, and Alianza Team's policies. The Alianza Team Policy Guidelines [TE-JUR-PR-008] establish a framework to ensure their conduct upholds integrity and fosters adherence to SAGRILIFT.

H. Statutory Auditor:

They are obligated to report to the criminal, disciplinary, and administrative authorities any alleged commission of a crime against the economic and social order, such as AL/TF, that they detect in the exercise of their position. These facts must also be brought to the attention of the company's social bodies and administration. Furthermore, they are required to report Suspicious Operations to the UIAF when these are observed within the ordinary course of their work.

I. Internal Audit:

The Internal Audit, functioning as an internal control body, delivers an independent and objective assurance function within the Company. Therefore, concerning SAGRILIFT, it shall execute the following duties, in addition to those stipulated elsewhere:

- Include in the audit plan verifications regarding the effectiveness and compliance of the SAGRILIFT's stages and elements, to provide a basis for both the Compliance Officer and the Company's administration to identify deficiencies and potential solutions.
- Communicate the results of the audits conducted on the SAGRILIFT to the Board of Directors or the highest governing body, the Principal Legal Representative, the Legal Representative in Compliance Matters, and the Compliance Officer. These individuals will be responsible for evaluating the results and ensuring effective follow-up on observations to implement appropriate corrective actions.
- Support evaluations and verifications undertaken to ascertain the compliance of control activities established by the Companies, based on generally accepted auditing procedures.
- When deemed necessary by the Compliance Officer, and upon direct request from the Labor Risk and Integrity Committee, provide support to the Compliance Officer for the execution of special investigations into detected cases or identified suspicious operations.

- Inform the Compliance Officer of any instances of non-compliance with SAGRILAFI procedures and codes of conduct, as well as any observed weaknesses or deficiencies in the controls and processes supporting this System, identified during the normal execution of duties. Such reports shall include the reasons and explanations for the report, along with relevant supporting documentation. Incompatibilities and Disqualifications of the Different Bodies: Taking into account the functions described above, in which there are different bodies and instances in charge of carrying out an evaluation of the SAGRILAFI's compliance and effectiveness, the statutory auditor, internal auditor, legal representative, or administrator must not be designated as the Compliance Officer, to avoid the appearance of conflicts of interest, incompatibilities, and disqualifications.

J. Incompatibilities and Disqualifications of the Various Bodies:

Given the aforementioned functions, which involve different bodies and instances responsible for evaluating the SAGRILAFI's compliance and effectiveness, the statutory auditor, internal auditor, legal representative, or administrator must not be appointed as the Compliance Officer. This measure is essential to prevent the appearance of conflicts of interest, incompatibilities, and disqualifications.

D) DUE DILIGENCE

The Company has adopted Due Diligence as a fundamental principle within its Compliance programs, in strict adherence to Law 2195 of 2022. This process must be meticulously executed prior to the onboarding of any counterparty with whom a legal business relationship is to be established, with particular emphasis on counterparties categorized under Anti-Money Laundering/Terrorist Financing/Proliferation of Weapons of Mass Destruction (AL/TF/FPADM) Risk Factors.

The primary objective of due diligence is to accurately identify the counterparty and rigorously verify its identity, including its ultimate beneficial owners and its ownership structure in the case of a legal entity. Furthermore, it aims to obtain comprehensive information regarding the purpose of the commercial relationship and to critically examine all transactions conducted throughout the commercial relationship, thereby ensuring their consistency with the Company's established knowledge of the counterparty.

The due diligence process shall be conducted with a minimum frequency of once every two years. To facilitate a thorough understanding of its counterparties, the Company has implemented standardized forms. These forms are tailored to the specific economic sector of each counterparty and are adjusted in accordance with their assessed AL/TF/FPADM risk factors.

A. Enhanced Due Diligence:

Enhanced Due Diligence is mandated for counterparties and their Ultimate Beneficial Owners (UBOs) who pose an elevated risk to the Company, are designated as Politically Exposed Persons (PEPs), or are situated in uncooperative nations and high-risk territories. This procedure transcends standard Due Diligence, entailing a more profound comprehension of the counterparty, their UBO, and the provenance of their assets.

E) ALERT SIGNALS

The Company shall implement tools, databases, and preferably technological applications or other

mechanisms to consolidate and identify current or future alerts.

Through the consolidation of this information, these technological platforms are required to generate indicators and alerts from which the existence of situations deviating from the normality patterns established by the Company for a particular sector, industry, or counterparty type can be inferred or identified.

Should any asset, product, fund, or right of ownership in the name of, or under the administration or control of, any country, person, or entity included in these Binding Lists be identified or verified, the Compliance Officer must immediately report it to the UIAF and bring it to the attention of the Attorney General's Office.

F) REPORTING MECHANISMS

The Company maintains a Corporate Transparency and Ethics Policy, from which an Integrity Line is derived. This line is designed to assist in the detection of situations that contravene this Policy, are unethical, or represent potential violations of the Company's Principles, its policies, and any norms that complement, modify, or substitute them.

G) DOCUMENT RETENTION

The Compliance department and legal representative are responsible for ensuring the appropriate utilization of resources and tools to permanently archive and manage all documentation and activities pertaining to the implementation and execution of the SAGRILAF program, or as mandated by law.

These activities must be meticulously documented, adhering to criteria of integrity, reliability, availability, compliance, efficiency, and confidentiality.

SAGRILAF documents are required to be retained for a period of ten years from the date of the last accounting transaction, in accordance with Article 28 of Law 962 of 2005, or any subsequent modifying legislation, encompassing international contracts and transactions.

Pursuant to Paragraph 1 of Article 12 of Law 2195 of 2022, documentation related to due diligence must be stored for the duration of the business or contract, and for an additional five years subsequent to its finalization. The company shall adopt the longer retention period, thereby electing to archive the documents for ten years, calculated from the termination of the relationship or commercial transaction.

H) SUSPICIOUS OPERATIONS REPORTS (ROS) TO THE UIAF

The aforementioned mechanisms enable the company to identify Unusual Operations and Suspicious Operations. Upon identification and analysis of an Unusual Operation or a Suspicious Operation, the supporting documentation that facilitated its categorization will be retained. All Suspicious Operations detected during the ordinary course of business or activities will be reported immediately to the UIAF.

I) REPORTS FROM THE GOVERNING BODIES

The Compliance Officer, in collaboration with the legal representative for compliance matters, is required to present reports to the Board of Directors at least annually. These reports must include, at a minimum, an evaluation and analysis of the SAGRILIFT's efficiency and effectiveness, a report on the outcomes, analyses, evaluations, and corrective actions undertaken in its implementation, management, progress, adherence, challenges, and the effectiveness achieved. Where appropriate, they should also propose corresponding enhancements.

Furthermore, these reports must demonstrate the efficacy of the Compliance Officer's management and the Company's administration, generally, in fulfilling the SAGRILIFT.

Moreover, these reports are to encourage the adoption of corrections and updates to the SAGRILIFT when circumstances necessitate, and at a minimum, biennially. To this end, they must submit to the Board of Directors, as applicable, the proposals and justifications for the suggested corrections and updates to the SAGRILIFT.

These reports may incorporate findings from prior reviews conducted by other oversight bodies, such as the statutory auditor and internal audit, should the compliance officer and the legal representative for compliance matters identify material deficiencies within the SAGRILIFT.

J) SANCTIONS

Non-compliance with SAGRILIFT and other established company policies constitutes a grave transgression. Any individual, be it an employee, contractor, supplier, consultant, or other third party, implicated in an AL/TF/FPADM situation or illegal conduct detrimental to the Company, shall be subject to a disciplinary investigation. This investigation may culminate in:

- **Termination of the employee's contract.**
- **Issuance of a formal written warning to the employee.**
- **Forfeiture of company benefits (e.g., bonuses, insurance).**
- **Reimbursement for damages incurred or the illicitly obtained amount.**
- **Initiation of criminal or civil legal proceedings, as deemed applicable.**
- **Termination of the commercial relationship with a contractor without entitlement to compensation.**

Furthermore, infractions of SAGRILIFT and other pertinent laws in Colombia and the countries in which the Company operates may engender criminal and civil liabilities.

Should an investigation recommend the termination of an employment contract, the decision necessitates review and approval from the Vice President of Talent Development and the Talent and Labor Relations Directorate (or their future equivalents). Approval from the Vice Presidency of Corporate Affairs and external consultants may also be requisite to ensure adherence to due labor and legal process.



7. ANNEXES

- TE-JUR-PR-008 POLICY GUIDELINES
- TE-JUR-MA-001 MANUAL OF TRANSPARENCY AND BUSINESS ETHICS PTEE
- TE-SIG-PO-001 RISK MANAGEMENT POLICY
- TE-JUR-MA-002 SAGRILIFT MANUAL
- TE-JUR-PO-004 PTEE POLICY
- SUPPLIER AND CONTRACTOR CODE VERSION IN SPANISH
- SUPPLIER AND CONTRACTOR CODE VERSION IN ENGLISH
- TE-CON-PR-022 SUPPLIER CREATION
- TE-JUR-PO-002 HIRING POLICY
- TE-JUR-PR-007 PROCEDURE FOR INVESTIGATING CONFLICT OF INTEREST, CORRUPTION, AND FRAUD CONDUCT
- TE-CRC-IN-001 CREDIT PROCESS MANAGEMENT AND CONTROL
- TE-REH-PR-003 SELECTION
- TE-REH-MT-002 CRITICAL POSITIONS MATRIX



8. CHANGE CONTROL

Version	Date	Brief description of the change
005	2023-04-01	General modification of the Company's SAGRILIFT Policy based on the provisions for this Self-Control and Integral Risk Management System AL/TF/FPADM in Circular 100-000016 of December 24, 2020, from the Superintendence of Corporations and other complementary norms.

CHANGE CONTROL PREVIOUS DOCUMENT CODE TE-ALD-PO-008

Version	Date	Brief description of the change
004	2020-02-10	Numbers 6.1.3.6 and 6.2.9.3 are modified.
003	2019-04-16	Section 6.2.2 is included, which states that the valid restrictive list consultation report is the complete report in pdf generated through the Infolaft tool.

Version	Date	Brief description of the change
002	2018-04-09	The changes were introduced due to the modification that the Superintendence of Corporations made to Chapter X of the Basic Legal Circular. They could not be made earlier because the Companies were going through a certification process as an Authorized Economic Operator (AEO) and the DIAN did not allow the policies submitted for their consideration to be modified on the occasion of said procedures. Likewise, numbers 6.4.2 and 6.4.3 are made in accordance with the risk management policy TE-SIG-PO-001.
001	2015-01-26	New Document

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SELF-CONTROL AND RISK MANAGEMENT POLICY FOR ASSET LAUNDERING AND TERRORIST FINANCING (AL/TF)