

**ANTI-MONEY LAUNDERING
AND COMBATING THE
FINANCING OF TERRORISM
POLICY**



GRUPO ARGOS

Investments that transform

1. PRESENTATION

In accordance with Grupo Argos S.A.'s ("Grupo Argos" or the "Company") commitment to uphold the highest ethical and regulatory standards, an Anti-Money Laundering and Counter-Terrorism Financing Self-Control and Risk Management System (hereinafter referred to as SAGRLAFT) has been designed to establish control measures aimed at preventing Grupo Argos' activities and operations from being used as instruments for concealing, managing, investing, or benefiting, in any manner, from money or other assets derived from illicit activities; to attempt to give an appearance of legality to resources linked to money laundering, and/or to channel resources for the commission of terrorist activities, the proliferation of weapons of mass destruction, and/or their predicate offenses.

2. OBJECTIVE

The main objective of this policy is to establish the general parameters of conduct that must be followed by all employees, managers—including members of the Board of Directors and Senior Management—shareholders, suppliers, customers, and, in general, all stakeholders of Grupo Argos, in order to achieve an efficient, effective, and timely functioning of the SAGRLAFT.

Additionally, this policy seeks to safeguard the reputation of Grupo Argos and protect its stakeholders by establishing the necessary measures to carry out the corresponding control processes, in order to prevent, in any way, the Company's activities or resources from being used for illicit purposes or being involved with third parties related to money laundering or terrorism financing activities (hereinafter "ML/TF"), and financing the proliferation of weapons of mass destruction (hereinafter "PWMD").

3. POLICY

Grupo Argos' policy is to direct all its efforts toward the adequate management of ML/TF/PWMD risk, following the current legal framework and international recommendations, especially those issued by the Financial Action Task Force (FATF) and the Financial Action Task Force of Latin America (GAFILAT). Therefore, it will promote and establish an institutional anti-money laundering and anti-terrorism financing culture applicable to all its employees, managers, shareholders, suppliers, customers, and, in general, all stakeholders. To achieve this, Grupo Argos:

- When making investments, carries out the corresponding risk analyses and Due Diligence to prevent relationships with third parties linked to illicit capital, or to ML/TF/PWMD activities or any of their predicate offenses.
- Has a Due Diligence procedure for the onboarding of its employees, managers, suppliers, and customers.
- Complies with the regulations applicable to securities issuers for shareholder onboarding purposes.
- Monitors the operations of individuals or corporations, domestic or foreign, who, due to their profile or the functions they perform, may expose the company to a higher level of ML/TF/PWMD risk, including Politically Exposed Persons (PEPs).
- Does not engage business or contractual relationships with third parties who do not provide the necessary documentation and information for ML/TF/PWMD risk management.
- Has guidelines for segmenting, identifying, measuring, controlling, and monitoring risk factors and risks associated with the company.

- Makes portfolio investments only with counterparties that have implemented or will implement an ML/TF risk management system.
- Has a sanctions regime that governs the consequences of compliance and non-compliance with SAGRLAFT. Any breach of this policy will be governed by the provisions of Chapter 7 of the Code of Business Conduct (“Consequences of Improper Acts”).
- Monitors all unusual and suspicious transactions, whether attempted or completed, according to the criteria established by Grupo Argos and reports them to the relevant authorities when appropriate.
- Performs enhanced Due Diligence when carrying out international transactions whose origin or destination involves countries classified as “Tax Havens” or “International Financial Centers” (in accordance with the list established by the Organization for Economic Co-operation and Development – OECD) or Non-Cooperative Jurisdictions (according to the FATF or any other relevant authority).
- Implements Due Diligence and monitoring procedures according to the level of risk of the counterparty.
- Has a training program on ML/TF/PWMD risk prevention and control topics, which may be incorporated into the Annual Conduct Course
- Has guidelines and methodologies to segment, identify, measure, control, and monitoring ML/TF/PWMD risk factors associated with the company.

All the guidelines set forth in this policy are deemed to be incorporated into Grupo Argos’ Code of Business Conduct.

4. SCOPE

This policy applies to all employees, managers, shareholders, suppliers, customers, and, in general, all stakeholders of Grupo Empresarial Argos.

5. POLICY GOVERNANCE

The following are the direct stakeholders responsible for establishing the necessary activities to achieve this policy:

- Compliance team
- Business Conduct Officer
- Compliance Officer
- Business Conduct Committee
- Investigation Officers
- Vice Presidents
- President
- Internal Audit
- Sustainability and Corporate Governance Committee
- Board of Directors

6. RESPONSIBLE FOR CONTROL AND APPROVAL

This policy may be amended based on recommendations issued by the Sustainability and Corporate Governance Committee and must be approved by the Board of Directors.

The Sustainability and Corporate Governance Committee, with the support of the Business Conduct Committee, will review this policy whenever it deems it necessary and will propose any amendments it considers appropriate.

Considering that this policy has a special impact on third parties and shareholders, once a modification is approved by the Board of Directors, it must be published on the website. Any updates made to it must be disclosed at the same level of disclosure.