	INTEGRATED MANAGEMENT SYSTEM		
	ROCKWELL AUTOMATION COLOMBIA S.A. TRANSPARENCY AND BUSINESS ETHICS PROGRAM MANUAL		
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I. PREFACE

The Transparency and Business Ethics Program (hereinafter, "TBEP" or the "Program") of Rockwell Automation Colombia S.A. (hereinafter, the "Company", "RA", or "Rockwell"), is the set of all the procedures in charge of the Compliance Officer, Management and other employees of the Company that aim to identify, detect, prevent, manage, and mitigate the Risks of Corruption and Transnational Bribery (hereinafter, "C/TB Risks").

The Superintendence of Corporations has determined, through the issuance of Chapter XIII of the Basic Legal Circular of 2021 and other complementary documents (hereinafter the "Circular") that the supervised corporations that in the preceding calendar year have carried out international business or transactions of any nature, directly or through an intermediary, contractor or through a subordinate company or a branch, with foreign individuals or legal entities of public or private law, equal to or greater (individually or jointly) than 100 SMLMV, or that in the preceding calendar year have obtained income or have total assets equal to or greater than 30. 000 SMLMV, must implement a TBEP.

As a supervised corporation with a gross income, as of December 31, 2021, that exceeded 30,000 SMMLV, Rockwell Automation Colombia S.A is obliged to implement a TBEP, which is documented in this manual (hereinafter, the "Manual").


The corporate purpose of the TBEP is to publicly declare the Company and its senior management's commitment to act ethically and transparently before its stakeholders, and to conduct business in a responsible manner, acting under a philosophy of zero tolerance with those acts that contravene the principles of transparency and business ethics.

All staff associated to the Company, related parties, and stakeholders, including customers, suppliers, distributors, contractors, shareholders, investors and, in general, all those with whom Rockwell directly or indirectly establishes a commercial, contractual, or cooperative relationship must apply the provisions of this Program.

The TBEP compiles and standardizes the following points: (i) the diagnosis of the associated C/TB risks to which Rockwell is exposed within the ordinary course of its operation domestically and abroad; (ii) the roles, responsibilities and duties of the relevant actors and employees, (iii) the Company's policies in relation to the prevention of C/TB Risks, (iv) a procedure for the measurement and treatment of C/TB Risks for their mitigation, (v) the sanctioning regime and complaint channels; and (vi) the parameters for their follow-up and monitoring. For these purposes, the general compliance policies that Rockwell Automation Inc., RA's parent company (hereinafter, the "Parent Company") has established at a global level have been taken into consideration.

A. Background

The main international and local regulations governing the prevention of C/TB Risks have served as a guide for the preparation of this Manual.

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The Republic of Colombia has implemented several laws and Resolutions that have based the regulatory context under which the activity of management, identification, control, and mitigation of risks derived from acts of Corruption and Transnational Bribery that may exist is regulated, namely:

A.1 International Regulations:

- Foreign Corrupt Practice Act (“FCPA”).
- The OECD Anti-Bribery Convention (“OECD”).
- The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.
- Civil Law Convention on Corruption – The Council of Europe.
- Criminal Law Convention on Corruption – The Council of Europe.
- Inter-American Convention Against Corruption – OAS (Ratified by Law 412 of 1997).
- African Union Convention on Preventing and Combating Corruption.
- United Nations Convention against Corruption (Ratified by Law 412 of 2005).


A.2 Domestic Regulations

- Law 80 of 1993.
- Law 222 of 1995.
- Law 599 of 2000.
- Law 1474 of 2011.
- Law 1778 of 2016.
- Law 2195 of 2022.
- Resolution 200-00816 of 2018.
- Resolution 100-006261 – October 2 of 2020;
- Chapter XIII of the Basic Legal Circular of the Superintendency of Corporations.

B. Definitions


For purposes hereof, the following terms shall have the meanings set forth below:

- **Total Assets:** All assets, current and non-current, recognized in the statement of financial position that correspond to present economic resources controlled by the Company.
- **Acts of Corruption:** These are acts or omissions that constitute the crimes of: private corruption (art. 250 A of the Criminal Code); disloyal administration (art. 250 B of the Criminal Code); improper use of privileged information (art. 258 of the Criminal Code); illicit enrichment of private individuals (art. 327 of the Criminal Code); conspiracy to commit a crime (art. 340 of the Criminal Code); embezzlement in all its forms (arts. 397-403 A of the Criminal Code); extortion (art. 404 of the Criminal Code); bribery in all its forms (arts. 405-407 of the Criminal Code); crimes of State Contracting (arts. 408-410 A of the Criminal Code); influence peddling by a public servant (arts. 408-410 A of the Criminal Code); influence peddling by public servants and private individuals (arts. 411 and 411 A of the


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Criminal Code); illicit enrichment (art. 412 of the Criminal Code); improper use of information obtained in the exercise of public functions (art. 431 of the Criminal Code); improper use of influence derived from the exercise of public function (art. 432 of the Criminal Code); transnational bribery (art. 433 of the Criminal Code); association for the commission of a crime against public administration (art. 434 of the Criminal Code); as well as any modification or addition to these conducts.


- **Senior Management:** These are the legal representatives of Rockwell, appointed in accordance with its bylaws to manage and direct it, as well as the regional and global managers.
- **Associates:** Natural or corporate persons who have made a contribution in cash, labor or other assets to Rockwell in exchange for shares or any other representation of equity.
- **Compliance Audit or Assessment of the Environment:** It is the systematic, critical, and periodic review of the proper implementation and execution of the TBEP.
- **Compliance Area:** These are the non-statutory bodies created within the local or global Rockwell organization whose function is to resolve internal investigations initiated by order of Senior Management or the Compliance Officer, or by filing with the Rockwell Complaint Line, as the case may be.
- **Reporting Channels:** These are all communication channels provided by Rockwell to answer questions related to the application of this Manual, as well as the reporting of complaints about risk events, including the line provided by the Superintendence of Corporations on their website.
- **State Contract:** Corresponds to the definition established in Article 32 of Law 80 of 1993, in each of its modalities.
- **Contractor:** Any person who provides services to Rockwell or has a contractual legal relationship of any nature with Rockwell. Contractors may include, but are not limited to, suppliers, intermediaries, agents, distributors, advisors, consultants, or counterparties to risk-sharing or collaborative contracts. For the purposes of this Manual, Contractors do not include Rockwell's customers and employees.
- **Corruption:** All conducts aimed to benefit, or that seek a benefit or interest for a company, or for the company to be used as a means, in the commission of crimes against the public administration or public assets or in the commission of Transnational Bribery conducts.
- **Due Diligence:** The periodic review to be performed on the Legal, Accounting and Financial aspects related to a business or transaction, the purpose of which is to identify the C/TB Risks that by virtue of the legal relationship may affect the Company. This concept includes an inquiry on the good standing and reputation of the Contractors.

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- **Employee:** An individual who is obligated to provide a personal service under an employment or service contract with Rockwell.
- **Risk Events:** Situations or events that could potentially constitute Acts of Corruption that could occur at Rockwell or in the performance of its business.
- **Risk Factors:** The possible elements or causes that generate the C/TB risk.
- **Performance Report:** This is the report containing the diagnosis of the assessment of the inherent and residual risks to which Rockwell is exposed in relation to the Corruption Risk.
- **Binding Lists:** Lists of people and entities associated with terrorist organizations that are binding for Colombia under Colombian law (Article 20 of Law 1121 of 2006) and under international law, including but not limited to Resolutions 1267 of 1999, 1373 of 2001, 1718 and 1737 of 2006, 1988 and 1989 of 2011, and 2178 of 2014 of the United Nations Security Council and all those that succeed, relate to and complement it, and any other lists binding for Colombia (i.e., lists of the United Nations Security Council, OFAC lists, INTERPOL, lists of judicial records of the Police, lists of terrorist organizations and persons classified as terrorists of the European Union, lists of terrorists of the United States of America, among others).
- **Compliance Manual or Manual:** The present document that includes the Compliance Policies and the Transparency and Business Ethics Program.
- **Risk Matrix:** The document containing the risks that have been preliminarily identified for Rockwell, which enables Rockwell to identify, individualize, segment, evaluate and control the Corruption Risks to which it could be exposed, in accordance with the risk factors identified.
- **International businesses or transactions:** Businesses or transactions of any nature involving foreign natural or corporate persons of public or private nature.
- **Compliance Officer:** Natural person appointed by Senior Management to lead and manage the Business Ethics and Transparency Program (TBEP).
- **Politically Exposed Person (PEP):** Public servants of any nomenclature and job classification system of the national and territorial public administration, whenever the positions they occupy, have in their area of responsibility or in their job description, under their direct responsibility or by delegation, the general direction, formulation of institutional policies and adoption of plans, programs and projects, the direct management of goods, money, or securities of the State. These may be through expense management, public contracting, management of investment projects, payments, liquidations, administration of goods and real estate.

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- Politically Exposed Person (PEP) of International Organizations:** Natural persons who exercise directive functions in an international organization, such as the United Nations Organization (UN), Organization for Economic Cooperation and Development (OECD), the United Nations Children's Fund (UNICEF) or the Organization of American States (OAS), among others (i.e., directors, deputy directors, members of the general assembly of shareholders or any person exercising an equivalent function).
- Foreign Politically Exposed Persons (PEP):** Natural persons who perform high-profile and prominent public functions in another country, such as (i) Chiefs of State, Prime Ministers, Ministers, Deputy Secretaries or Secretaries of State; (ii) congressmen or parliamentarians; (iii) members of supreme courts, constitutional courts or other high judicial instances whose decisions do not normally admit an appeal, except in exceptional circumstances; (iv) members of courts or of the boards of directors of central banks; (v) ambassadors; (vi) business representatives; (vii) senior officials of the armed forces; (viii) members of the administrative, management or supervisory boards of state-owned enterprises; (ix) members of reigning royal families; (x) prominent leaders of political parties or movements; and (xi) legal representatives, directors, deputy directors, members of senior management and members of the board of an international organization (i.e., heads of state, politicians, senior government, judicial or military officials and senior executives of state-owned enterprises).
- Compliance Policies:** The general policies adopted by Rockwell to conduct its business in an ethical, transparent, and honest manner, and to be able to identify, detect, prevent, and mitigate C/TB Risks.
- Transparency and Business Ethics Program – TBEP:** The program contained in this document that includes the procedures aimed at implementing the Compliance Policies in order to identify, detect, prevent, manage and mitigate C/TB Risks.
- Corruption Risk:** The probability that Rockwell will suffer harm, damage, or adverse consequence, as a result of its direct or indirect, actual or alleged linkage to Acts of Corruption committed or facilitated by actions or omissions of any of its Contractors or Employees. Corruption Risks can materialize through four categories: Legal Risk, Operational Risk, Reputational Risk and/or Economic Risk.
- Economic Risk:** The possibility that, as a result of an Act of Corruption, Rockwell suffers economic losses. This risk is related to the other risks associated with the Corruption Risk.
- Contagion Risk:** The possibility of negative impact that Rockwell may suffer, directly or indirectly, from an action, omission or experience of a Contractor or Employee in connection with an Act of Corruption.
- Legal Risk:** The possibility that, as a consequence of an Act of Corruption, Rockwell, its Contractors or Employees may be formally linked to administrative or judicial prosecution, sanctioned administratively or judicially, or declared legally responsible or ordered to pay indemnities or fines.

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- **Operational Risk:** The possibility that human, technical or technological failures occur in Rockwell's procedures or in the controls designed to prevent Acts of Corruption, and as a consequence of such failure, an Act of Corruption is executed or enabled.
- **Reputational Risk:** The possibility that the name or company name of Rockwell, any of the brands associated with it, or any of its associates, directors, managers, representatives, employees, contractors, or representative collaborators, are mentioned publicly, through the media, or are perceived in the public opinion, as being related to acts of corruption. This risk exists regardless of whether the information is true or false.
- **Public Official:** Public officials are the members of public corporations, employees and workers of the State and its decentralized territorial and service entities. Public officials are also members of the Armed Forces, individuals who perform public functions on a permanent or temporary basis, officials and workers of the Central Bank, members of the National Citizen Commission for the Fight against Corruption and persons who administer fiscal and/or parafiscal resources.
- **Foreign Public Official:** It has the scope provided in Paragraph One of Article 2 of Law 1778 of 2016. A foreign public official is any person who holds a legislative, administrative or judicial position in a State, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of whether the individual has been appointed or elected. A foreign public official is also considered to be any person who exercises a public function for a State, its political subdivisions, or local authorities, or in a foreign jurisdiction, whether within a public agency, a state enterprise, or an entity whose decision-making power is subject to the will of the State, its political subdivisions or local authorities, or a foreign jurisdiction. It shall also be understood that any official or agent of a public international organization has the status.
- **Transnational Bribery:** The legal entities that through one or several employees, contractors, administrators, or associates, through their own or any subordinate legal entity, give, offer, or promise a foreign public official, directly or indirectly, money or any object of pecuniary value or any other benefit or utility, in exchange for the foreign public official to perform, omit, or delay any act related to the exercise of his functions and in connection with an international business or transaction.
- **Subordinated Company:** A company will be subordinated or controlled when its decision-making power is subject to the will of another or other persons who will ultimately be its parent or controlling company, either directly, in which case it will be called an affiliated company, or with the assistance or through the subordinates of the parent company, in which case it will be called a subsidiary.
- **Supervised Company:** The Company subject to the supervision of the Superintendence of Corporations under the terms provided in Article 84 of Law 222 of 1995.

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C. Principles

The TBEP is based on a series of principles that guide all actions and regulations related to Rockwell's corporate governance, which must be known and respected by all employees and managers of the Company to be applied in their relations with third parties in the regular operation of the Company, which are set out below:

- **Principle of Legality:** To ensure compliance not only with the letter, but also with the spirit of the Colombian Constitution and laws, as well as the provisions and regulations issued by the authorities and the rules and policies established by the Company.
- **Principle of Honesty:** To ensure that employees, collaborators and other third parties with whom the Company relates are aware of their responsibilities and their moral, legal and employment obligations and practice them in a transparent, honest, and legitimate manner.
- **Principle of Good Faith:** To act in good faith, with diligence and care, permanently ensuring respect for people and compliance with the law and prioritizing the Company's principles and values over private interests in its decisions.
- **Principle of fidelity:** To ensure the timely communication of any fact or irregularity committed within the Company, which affects or may harm its interests, those of its customers, its shareholders and/or its directors.
- **Principle of General and Corporate Interest:** To ensure that management at all levels is devoid of any economic interest or any other interest that goes against the interests of the Company and whose objective is personal benefit.

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II. STAGE 1: DIAGNOSIS

A. TBEP Structure

A.1 Definition of the Objectives

The main objective of the TBEP is that Rockwell can fulfill its corporate purpose without being instrumentalized for Acts of Corruption or Transnational Bribery. The Company seeks to develop business within the legal framework and always acting ethically.


Given the above, Rockwell, through this Manual, aims to adequately manage the C/TB Risk, by strengthening the organizational culture, minimizing the risk of loss of financial resources due to sanctions and/or fines by the Supervisory Bodies, avoiding investigations and administrative, civil, and criminal penalties for the Company, and in turn, preventing damage to its reputation.

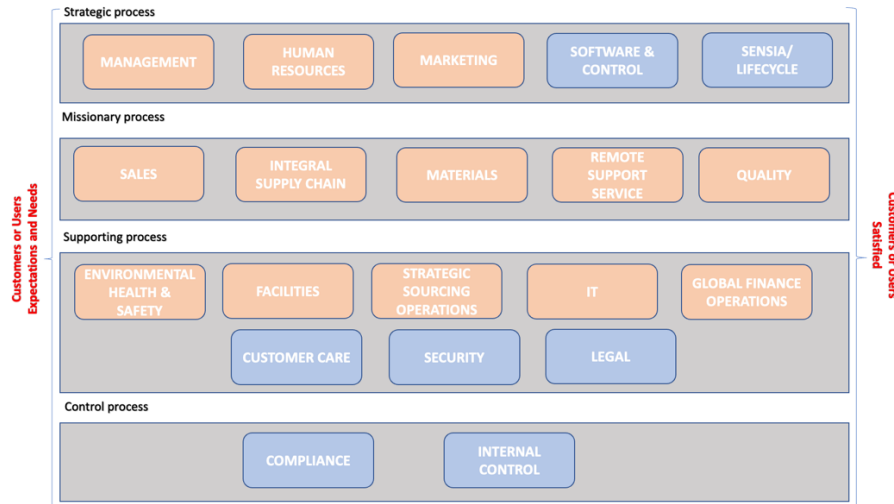
The objectives of the implementation of the TBEP are:

- To have a clear and complete identification of counterparties to prevent Rockwell from being instrumentalized to develop activities related to C/TB.
- To have a clear and complete knowledge of employees and people linked through temporary service companies, to have a committed and trained human resource in the fight against C/TB.
- To maintain the application of the law and national and international standards to prevent the development of C/TB activities.
- To identify Risk Events inherent to Rockwell's operation.
- To establish the procedure for the identification, evaluation, and mitigation of C/TB Risks.
- To comply with the law, and for the purposes of this Manual, the provisions of Chapter XIII of the Basic Legal Circular of the Superintendence of Corporations.

A.2 Definition of Rockwell's Organizational Structure

The organizational structure involved in compliance with the TBEP is shown below:

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B. Rockwell and the Senior Management's Commitment to prevent the Risk of Corruption and Transnational Bribery.

The Company aims that the company, its employees and its third-party relationships are governed by the values and ethical principles that every entity should have when acting fairly, healthy, honestly and always abiding by the law, with the understanding that ethics and integrity are fundamental values and principles to seek the greater good.


That is why a culture of ethical and integral corporate behavior is encouraged, so that the highest standards of truthfulness and honesty are always met in all areas of its operations, both at the organizational level, as well as with all the individuals who integrate the Company and the third parties with whom it interacts.

As such, Rockwell will come closer to its objective of being a company with which customers, investors, entrepreneurs, and suppliers prefer to be associated due to the added value of having ethical principles and integrity.

Moreover, the Company's Senior Management must issue clear policies that establish the method to prevent Acts of Corruption, always following the principles of professionalism, honesty, loyalty, impartiality, equality, objectivity, and efficiency, in each case, to prevent any illegal act that may represent a risk for the Company.

In this way, as a concrete expression of this commitment, the Company has adopted the following procedures that will allow the implementation of the Compliance Policies:

- To encourage full compliance with the Company's Policies.
- To ensure that this Manual is implemented, evaluated, and approved by the Company's Senior Management.

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- To ensure the necessary economic, human, and technological resources for the proper execution of the Manual, its policies, and procedures and, in general, to prevent any corrupt practices.
- To carry out an exhaustive evaluation of the Risks to which the Company is exposed, as well as the controls designed for their mitigation, all of which is recorded in the Risk Matrix.
- To disclose the disciplinary regime adopted and that will be applied to any of the Employees, Contractors, and collaborators (as the case may be) who violate the principles, values, policies, and behavioral standards set forth in this Manual.
- To develop communication and disclosure strategies that will be implemented by the Compliance Officer.
- To create specific guidelines for Employees who are exposed to the risk of Corruption and Transnational Bribery.
- To regulate political contributions, donations and expenses related to entertainment, food, lodging and travel expenses of employees.
- To create confidential and secure channels that allow reporting the existence of suspicious activities related to the Risk of Corruption and Transnational Bribery.
- To comment on the biannual report made by the Compliance Officer.

C. Internal and External Audit


For the preparation of this TBEP, the internal and external context of Rockwell have been analyzed, with the objective of clearly identifying the C/TB Risks that need to be mitigated. For this purpose, the Company's strategic, organizational and risk management setting was studied.

This process has been carried out based on the guidance, analysis, and contrast of the expert judgment of external advisors and the Compliance Officer.

C.1 Rockwell's business and regulatory environment

Rockwell carries out its corporate purpose in constant connection with the real sector of the Colombian economy within different industries, such as: hydrocarbons, retail, automotive, among others. Its offer of goods and services is focused on the automation of processes for these industries and digital transformation. The energy sector and the consumer industry together represent approximately 54% of the company's sales, standing out as segments of great impact for the company's objectives of growth.

The Company carries out its corporate purpose through the following activities registered in the

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Mercantile Registry:

- CIIU 4669 – Wholesale trade of other products.
- CIIU 3319 – Maintenance and repair of other equipment and its components.
- CIIU 8220 – Call center activities.
- CIIU 6201 – IT systems development activities.

The main regulation governing its activity is the following:

- The Political Constitution of 1991
- Civil Code
- Code of Commerce
- Law 222 of 1995
- Basic Legal Circular of the Superintendency of Corporations

C.2 Parties

Third parties interested in Rockwell's activity are classified into four groups (i) suppliers, (ii) clients, (iii) employees and (vi) public entities that regulate its operation.


- Suppliers: Rockwell's Parent Company is its main supplier. However, as part of its operation, it carries out several transactions with the other companies that make up the corporate group and that are in the United States of America, Canada, Ecuador, Mexico, Puerto Rico, Venezuela, Brazil, India, Chile, Costa Rica, Guatemala, Panama, Argentina, The Netherlands and Peru.

However, Rockwell uses third-party domestic and international suppliers, ranging from large companies to micro-enterprises, to meet specific needs. Internationally, its main suppliers are in different countries around the world. Domestically, its main suppliers are in the city of Bogota, D.C.

- Clients: These are private and public companies that, for the most part, are national and belong to the real sector. These customers are in industries such as oil and gas, mining, cement, consumer goods, vehicles, and health, among others.

The following Clients are highlighted for each sector of the economy:

- Oil and gas: Ecopetrol, Cenit, Sierracol and Frontera.
- Mining: South 32 (formerly known as Cerromatoso), Carbones de Cerrejón and Continental Gold.
- Cement: Cementos Argos, Cementas San Marcos and Ultracem.
- Consumer: Nestlé, Kimberly Clark and Jhonson & Jhonson.
- Vehicles: Goodyear and General Motors.
- Health: Tecnoquímicas and Procaps.

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Rockwell's main distributor in Colombia is Melexa S.A.

1. Employees: The Company's employees are mostly Colombian and Venezuelan, with an average age of 35 years, 67% men and 33% women. These employees generally work in management, commercial (sales and purchasing) and technological development positions, among others.
2. Public entities that regulate its operation: The Ministry of Mines and Energy, the National Planning Department, the Ministry of Environment and Sustainable Development, the Ministry of Finance and Public Credit, the Superintendence of Corporations, the Superintendence of Industry and Commerce, the Central Bank, the National Administrative Department of Statistics, the National Tax and Customs Directorate, and other institutional actors are relevant entities that supervise and control its activity and the activity of its counterparties.

C.3 The Strategic Direction of the Company

Rockwell and the corporate group to which it belongs are world leaders in the development of industrial automation and IT products. Through its subsidiaries, the parent company is able to offer its products globally. Its vision is to be the most valuable supplier of automation, control, and information technology solutions globally.

The Company has identified that there are several opportunities in the industries in which it focuses its activity, especially in the manufacturing, infrastructure, and energy sectors. This is in view of Colombia's economic growth in recent years, which has implied an increase in consumption and modernization of infrastructure.


RA's main strength is the international corporate group that supports it. This is because this group has sufficient financial resources to invest in innovation and development, using the Company to commercialize automation solutions locally.

D. Initial C/TB Risk Diagnosis

Rockwell, has developed the C/TB Risk Control analysis and the implementation of its Policy considering the risks related to the following Sources or Risk Factors:

- Country Risk.
- Economic Sector Risk.
- Third Party Risks.

The following is a comprehensive diagnosis of the C/TB Risk in Rockwell, which develops the possible Risk Events for each of the Risk Sources:

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D.1 Country Risk


Given that Rockwell's operation is developed, mainly, in the international scenario between the Colombian Jurisdiction, and those of the United States of America, China, Canada, Ecuador, Brazil, India, Chile, Costa Rica, Guatemala, Panama, Argentina, The Netherlands and Peru; there is a high risk that the levels of care and Due Diligence required to ensure that Rockwell is not instrumented for C/TB purposes are not complied with.

It should be considered that the main development of the Company's activities is carried out in Colombia and that this, in itself, constitutes a high risk factor for its operation, given that the Corruption Perception Index ("CPI"), prepared by Transparency International -which is used as a worldwide reference-, has found that Colombia obtained 39 points out of 100 in 2021, being 0, very high corruption and 100, absolute absence of corruption. This rating is obtained from the analysis of eight different sources that measure the perception of analysts, academics, and foreign investors, regarding how much corruption affects the public sector of the country and it has been considered that a rating below 50 points indicates very serious levels of corruption in the public sector, such as Colombia.

Rockwell will also need to assess the risk it runs when doing business in countries with low CPI scores. The following is an ascending list of the countries with which RA has done business in the past and is most likely to do business in the future:

Country	CPI Score
Guatemala	25
Ecuador	36
Peru	36
Panama	36
Brazil	38
Argentina	38
India	40
China	45
Costa Rica	58
Chile	67
United States of America	67
Canada	74
The Netherlands	82

As can be seen from the data presented above contracting with Latin American countries represents a higher risk, while European and North American countries represent a lower risk.

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D.2 Economic Sector Risk

Rockwell conducts its operations with clients in sectors such as the oil and gas, and mining sectors. Thus, according to the OECD Bribery Report: An Analysis of the Crime of Bribery of Foreign Public Officials (2014), 19% of the reported and evaluated acts of corruption occurred in these two sectors, which is why Rockwell has a significant risk that must be evaluated due to the industries in which it operates.

This risk, together with the Country Risk, represents a challenge for Rockwell in terms of contracting.

D.3 Third Party Risk

According to the OECD in the report, 71% of the corruption incidents involved the participation of third parties, such as contractors and controlled companies.

In this sense, several foreign authorities have pointed out that the most frequent cases of corruption include the participation of Contractors of high economic value, in which it is not easy to identify a legitimate purpose and its performance is not appreciated at market values. Likewise, the risk increases in countries that require intermediaries for the conclusion of an International Business or Transaction, in accordance with local customs and regulations.

As a result, the participation of a company in collaboration or risk-sharing contracts with Contractors, or when the latter are closely related to high-level government officials of a particular country, in the context of an International or domestic Business or Transaction, has been considered a high risk.


Nevertheless, given that Rockwell's suppliers are few and that the Parent Company is its main supplier, third-party risk is considerably reduced. RA shall assess the risk that is generated by contracting external suppliers to its Corporate Group and its Parent Company, to keep this Risk Factor as low as possible, given that it already has considerable Risk Factors in relation to the country and the economic sectors in which it operates.

E. Tracking and Monitoring


The implementation of the TBEP requires constant monitoring and updating of the Risk Events addressed, the effectiveness of the Treatment Plans designed and the different strategies of the System in general to make the necessary changes to prevent the Company from being used for Corruption and Transnational Bribery events.

The Program will be evaluated annually by the Compliance Officer and the results will be presented to the Legal Representative and the Board of Directors so that the necessary measures can be taken to improve and update this Manual and the Transparency and Business Ethics Program in general.

In accordance with the above, RA has defined the following tracking and Monitoring mechanisms:

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- Self-Assessment of Risk Events and Controls seeks to establish a critical approach that examines and evaluates the effectiveness of the System. The self-assessment should be brought to the attention of system users at least once a year.
- Review and evaluation of the Manual to verify the relevance and adequacy of the C/TB Risk management process, as well as of the Controls implemented to correct possible deficiencies detected. This is carried out by filling out the Self-Assessment Form (Annex F), in which Employees perform a self-criticism exercise regarding the way in which they have executed the provisions of this Manual.
- Analysis and investigation of Internal Reports, complaints to the Ombudsman and Risk Events of which the Compliance Officer is aware.
- Biannual reviews of the Risk Matrix (Annex A), to determine its validity and include new risks, if necessary.
- Update this Manual when there are changes within the activity developed by Rockwell that could alter the C/TB Risk, in any case it will be mandatory to make the review every 2 years and make the changes it deems appropriate.

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III. STAGE 2: REPORTING CHANNELS

Rockwell has several Reporting Channels that allow effective communication and the effective report of activities related to Corruption and Transnational Bribery. Therefore, different physical, virtual, and telephonic means have been established so that any interested person, including employees, customers, suppliers and third parties can report this information. The following are the available channels:

- Compliance Officer email address:

Rockwell has a dedicated email address for direct and exclusive communication with the Compliance Officer. Any person may send reports of risk events at any time through this channel.

E-mail address: oficialdecumplimentocol@rockwellautomation.onmicrosoft.com

- Online Risk Event Report

Rockwell has enabled an online reporting channel on its website. This tool is available for any interested person to report risk events anonymously at any time through the following link:

<https://secure.ethicspoint.com/domain/media/en/gui/43130/report.html>

- Physical mailbox for reporting Risk Events

Rockwell has a physical mailbox installed in its administrative offices so that employees can report risk events at any time in their workplace.
(Annex D).

- Support line/Ombudsman


Rockwell has enabled the email ombudsman@rockwell.com and the phone number 1-800-522-3589 (US), through which any relevant fact, Risk Event and/or Suspicious, Attempted or Unusual Operation is reported anonymously.

- Link of complaints of the Superintendence of Corporations


For the reporting of complaints of Transnational Bribery to the Superintendence of Corporations, the use of the complaints channel available at the following link is encouraged:

<https://www.supersociedades.gov.co/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional>

Employees, managers, and Associates may not be subject to retaliation for having reported possible violations of the law or the PTEE. Appropriate measures will be taken in relation to a serious offense for those who impede, repress, avoid, threaten the reporting of C/TB risk, so that

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the employees are not subject to harassment at work in accordance with the law. In any case, anonymous reporting channels are encouraged to avoid retaliation and the Company seeks that such reports are made to avoid C/TB.

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IV. STAGE 3: RELEVANT AGENTS AND EMPLOYEES

A. Parties Responsible for the Direction and Supervision of the PTEE

A.1 Board of Directors

As Rockwell's principal governing body, the Board of Directors has the following responsibilities and functions in relation to the TBEP:

- To issue and define the Compliance Policies on C/TB issues.
- To approve amendments and updates to the Manual, leaving evidence in the corresponding Minutes of the meeting where the approval, modification or addition is made.
- To supervise and demand observance of the TBEP to the Legal Representative, Compliance Officer, and other officers as deemed appropriate.
- To sanction employees who do not comply with the Manual with the application of the Sanctions Policy.
- To designate and select the main and alternate Compliance Officer.
- To establish and monitor the procedures aimed at allowing an effective, efficient, and timely verification of the information provided by potential clients in the know your client procedures.
- To arrange and guarantee the technical, logistical, and human resources necessary to implement and maintain the TBEP in operation, according to the requirements made by the Compliance Officer.
- To analyze and make timely decisions on TBEP operation reports, requests, corrective proposals, and updates submitted by the Compliance Officer, statutory auditor, internal and external audit and/or the Legal Representative.
- To establish guidelines and determine those responsible for conducting audits on the compliance and effectiveness of the PTEE.
- To verify that the Compliance Officer has the necessary resources and capabilities to carry out his or her functions.
- To verify that the Company, the Compliance Officer, and the Legal Representative carry out the activities and duties assigned by this Manual and the regulations regarding TBEP, especially the provisions of the Basic Legal Circular and its complementary regulations.


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- To take the appropriate actions against the Associates that have management and administration functions, employees, administrators, when any of the above violates the provisions of the TBEP.
- To lead an adequate communications and educational strategy for the effective disclosure and knowledge of the Compliance Policies and the TBEP for Employees, Associates, Contractors (in accordance with the Risk Factors and Risk Matrix) and other identified interested parties.

A.2 Legal Representative

For the operation of the TBEP, the Legal Representative is required to perform the following functions:

- To present, together with the Compliance Officer, the TBEP project to the Board of Directors for their review and approval.
- To ensure that the TBEP is in line with the Compliance Policies adopted by the Board of Directors.
- To provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the TBEP.
- To present, together with the Compliance Officer, the project of modifications to the PTEE when deemed necessary.
- To enforce the System that is approved by Rockwell's Board of Directors.
- To certificate before the Superintendence of Corporations the compliance with the provisions of the TBEP, when required.
- To provide the operational, economic, physical, technological and resource measures that are necessary for the Compliance Officer to implement the TBEP and develop the follow-up work for compliance with it.
- To verify that the Compliance Officer has the necessary resources and capabilities to carry out his/her functions.
- To ensure that the activities resulting from the development of the TBEP are duly documented in accordance with criteria of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality. The documentary evidence must be kept in accordance with the provisions of Article 28 of Law 962 of 2005.
- To assess the results of the C/TB Risk evaluation carried out by the Compliance Officer and to establish the corresponding action plans.

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B. Compliance Officer

B.1 Requirements for the appointment of the principal and alternate Compliance Officers.


The Compliance Officer, whether principal or alternate, shall comply with the requirements established by law for his/her appointment and permanence in the position, namely:

- To enjoy decision-making capacity within the organization for the C/TB Risk management, to have direct communication with and report to the Board of Directors.
- To have sufficient knowledge of C/TB Risk management and to understand the ordinary course of Rockwell's business.
- To be supported by a human and technical team, in accordance with the C/TB Risk and the size of Rockwell.
- To not be a member of the management, corporate bodies, or the statutory audit body (act as statutory auditor or be linked to the statutory audit firm that performs this function, if applicable) or whoever performs similar functions or acts in its stead.
- If his or her capacity as Compliance Officer is concurrent with another appointment or position, that his or her concurrent duties do not interfere with those of Compliance Officer.
- To not serve as Compliance Officer, principal or alternate, in more than ten (10) companies.
- To be resident in Colombia.
- All additional requirements defined by law.


B.2 Compliance Officer duties

The Compliance Officer, or in his absence, the Alternate Compliance Officer, is responsible for the execution and monitoring of the TBEP. For this purpose, they shall perform the following functions:

- To supervise and direct the design of the Manual.
- To oversee the execution and implementation of the TBEP.
- To lead the third-party engagement process.
- To present the TBEP draft for the approval of the Board of Directors.


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- To ensure the effective, efficient, and timely operation of the TBEP, as well as to encourage the adoption of corrective measures and updates to the TBEP.
- To implement a Risk Matrix and update it according to the Company's own needs, its Risk Factors, the materiality of the C/TB Risk and according to the Compliance Policy.
- To define, adopt and monitor actions and tools for the detection of C/TB Risk, in accordance with the Compliance Policy to prevent C/TB Risk and the Risk Matrix.
- To report to the Board of Directors at least once a year, referring at least to the following aspects:
 - The results of the performance, in terms of efficiency and efficacy.
 - The fulfillment that has been made in relation to the submission of reports to the different authorities.
 - The overall compliance with the Manual.
 - The individual and collective evolution of the Risk Factors and the Controls adopted, as well as the Associated Risks.
 - The effectiveness of the mechanisms and instruments established in the Manual, as well as of the measures adopted to correct its failures.
 - The results of the corrective measures ordered by the Board of Directors.
 - Proposal of possible improvements.
- To ensure the disclosure of the PTEE.
- To implement in-house training programs to generate a culture of prevention of C/TB activities.
- To present to the Legal Representative the requirements of computer, technological, physical, and human resources necessary for the fulfillment of its functions, which it has identified autonomously or with the help of third parties.
- To attend and coordinate any requirement, request, or diligence of a judicial or administrative authority in C/TB matters.
- To perform a biannual monitoring of the PTEE.
- To ensure the implementation of suitable channels to allow any person to report, confidentially and securely about breaches of the TBEP and possible suspicious activities related to C/TB.
- To design or amend existing methodologies for segmentation, identification, measurement, and control of C/TB Risk that will be part of the system.

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- To be aware of and manage complaints, concerns or dilemmas raised by staff members in relation to C/TB Risk.
- To evaluate the reports submitted by the Statutory Auditor and adopt the measures it deems appropriate in view of the situations reported.
- To verify compliance with the Due Diligence procedures applied by Rockwell.
- To ensure the proper filing of documentary evidence and other information related to the management and prevention of C/TB Risk. For the proper exercise of its functions, the Compliance Officer shall have access to the information and documents necessary for the development of its responsibilities, therefore, the areas of administration, management and control bodies shall provide the information required by the Compliance Officer.
- To execute, with the assistance of the Human Resources area, the sanctions adopted for those employees who fail to comply with the obligations of the System.
- To attend to and follow up on complaints made through the Ombudsman or any other means.
- To approve all decisions related to the Events that result in an Intolerable, Extreme, and High Risk for RA for the employee involved.
- To verify the proper application of Rockwell's reporting protection policy and, with respect to employees, the workplace harassment prevention policy in accordance with the law.
- To establish internal Rockwell investigation procedures to detect breaches of the TBEP and acts of C/TB.
- To coordinate the development of internal training programs.
- To design C/TB Risk classification, identification, measurement, and control methodologies that will be part of the TBEP.
- To carry out the evaluation of enforcement of the TBEP and the C/TB Risk to which Rockwell is exposed.
- To report acts of corruption by the obligated company, its managers, associates, or employees, internally and externally and the applicable procedure.
- To update the TBEP every time there are changes in the activity of the obligated company that alter or may alter the degree of C/TB Risk or at least every 2 years.

B3. The Compliance Officer's Disqualifications and Incompatibilities Regime

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The following situations shall be considered disqualifications or incompatibilities that prevent the Compliance Officer from performing his or her work with full independence. Therefore, a person may not hold this position if he/she:

- Has relatives up to the third degree of kinship, second degree of affinity or first civil relationship, with respect to persons involved with activities or operations related to C/TB.
- Due to the difference in the functions that correspond to the statutory auditor, internal auditor, the administrator and the Compliance Officer, the statutory auditor, internal auditor, or administrator shall not be appointed as Compliance Officer.
- Has not provided all the necessary information in the security and due diligence studies conducted by RA at the time of their engagement.
- Does not have sufficient independence and capacity of direction and management.
- Has ever incurred in crimes associated with C/TB Risk.
- Any others determined by the Board of Directors.

B.4 Conflicts of interest

If any circumstances arise that may affect the independence of the Compliance Officer, once he/she has been appointed by the Board of Directors, and for this reason his/her ability to properly perform the duties of his/her position is compromised, the Compliance Officer shall proceed to verify whether he/she is in a situation that jeopardizes his/her independence and objectivity. The Compliance Officer shall report such situation to the Legal Representative and distance himself/herself from any decision or report to be prepared in this regard.


Failure to comply with this provision shall lead to the sanctions set forth in this Manual, without limitation of the respective legal actions that failure to comply with this obligation may entail.

C. Parties responsible for the execution and support of the system

C.1. Purchasing Department

C.1.1. Strategic Sourcing Operations

- To execute the procedures defined in the Corporate Policies regarding the Anti-Corruption Policy, Supplier Code of Conduct, as well as the Single Counterparty Declaration Form (Annex I), for the effective knowledge and identification of RA's Suppliers.


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- To collect and check the information provided by the Suppliers to ensure that it is complete and complies with the Policies established by RA for its engagement, by analyzing its consistency and reasonability.
- To request the Compliance Officer for approval to contract with suppliers in accordance with the Due Diligence process.
- To structure and develop disclosure and training programs on the PTEE, in coordination with the Compliance Officer.
- To define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risks for their mitigation.
- To execute the Supplier segmentation processes to determine their risk level. To do so, they must follow the provisions of the Procedure for the Identification, Measurement, and Treatment of C/TB Risks for their Mitigation.
- To monitor the operations of Suppliers and report Unusual, Suspicious and Intended Transactions to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious and Intended Transactions.
- To assist in the execution of the strategies for the update of the information of the Counterparties.
- To keep record of all transactions carried out by RA with respect to its Suppliers.
- To evaluate the Counterparties according to the parameters set forth in this Manual.
- To report and update the information of Suppliers in the records determined by RA.

C.1.2. Customer Support and Maintenance

- To define and identify Warning Signals and analyze them according to the procedure for the Identification, Measurement and Treatment of C/TB Risks for Mitigation.
- To report Unusual, Suspicious and Intended Transactions in the development of their activities to the Compliance Officer, according to the Methodology for Identifying Unusual, Suspicious and Intended Transactions.
- To request the Compliance Officer for approval to contract with suppliers, according to the Due Diligence process.


C.1.3. Life Cycle

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- To execute the procedures defined in the Corporate Policies regarding the Anti-Corruption Policy, Supplier Code of Conduct, as well as the Single Counterparty Declaration Form (Annex I), for the effective knowledge and identification of RA's Suppliers.
- To collect and check the information provided by the Suppliers to ensure that it is complete and complies with the Policies established by RA for its engagement, by analyzing its consistency and reasonability.
- To request the Compliance Officer for approval to contract with suppliers in accordance with the Due Diligence process.
- To structure and develop disclosure and training programs on the PTEE, in coordination with the Compliance Officer.
- To define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risks for their mitigation.
- To execute the Supplier segmentation processes to determine their risk level. To do so, they must follow the provisions of the Procedure for the Identification, Measurement, and Treatment of C/TB Risks for their Mitigation.
- To monitor the operations of Suppliers and report Unusual, Suspicious and Intended Transactions to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious and Intended Transactions.
- To assist in the execution of the strategies for the update of the information of the Counterparties.
- To keep record of all transactions carried out by RA with respect to its Suppliers.
- To evaluate the Counterparties according to the parameters set forth in this Manual.
- To report and update the information of Suppliers in the records determined by RA.

C.2. Sales department

- To execute the procedures defined in the Policy of "Know Your Clients, Suppliers and Employees", for the effective prior knowledge of the Clients and their Beneficial Owners, if applicable.
- To verify the identity of potential Clients and their Beneficial Owners, by using digital signature certificates, biometrics, and/or any other technological mechanism that guarantees the effective verification of the potential client's identity.

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- Structure and develop in coordination with the Compliance Officer, disclosure, and training programs on the TBEP.
- To identify and take reasonable measures to verify the identity of the relevant natural person occupying the position of senior management officer, in case no natural person is identified under the circumstances established for the Beneficial Owner.
- To collect and check the information provided by Clients to verify that it is complete and in accordance with the Policies established by RA for their engagement, analyzing its consistency and reasonableness.
- To request the Compliance Officer for approval to contract with clients, according to the Due Diligence process.
- To define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risks for their Mitigation.
- To execute Client segmentation processes to determine their risk level. For this purpose, the Department must follow the provisions of the Procedure for the Identification, Measurement and Treatment of C/TB Risks for their Mitigation.
- To monitor Client operations and report Unusual, Suspicious and Attempted Operations to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious or Attempted Operations.
- To collaborate in the execution of strategies for updating Client information.
- To keep a record of all transactions carried out by RA with respect to its clients.
- To evaluate the Counterparties in accordance with the parameters set forth in this Manual.
- To report and update Client information in the records determined by RA.
- To perform regular due diligence of the business relationship with Clients, and to examine the transactions carried out throughout such relationship, to: i) monitor that the transactions carried out are consistent with RA's knowledge of the Client, and ii) ensure that the documents, data or information collected under the process of knowledge of the client, are kept updated at least every 2 years.
- To ensure that due diligence and enhanced due diligence procedures are performed in all transactions carried out by the area when required.
- To comply with the Market Access Procedure contained in the Corporate Policies for the engagement with Clients.

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- To inform and make this Manual available to all Clients.
- To ensure that RA clients submit to the TBEP, through the inclusion of contractual clauses that provide for it, as well as by signing the Single Declaration of Counterparties Form.
- To report and update the Clients' information in the records determined by RA.

C.3. Human Resources Department

- To ensure compliance with the procedures established for the hiring of new employees and persons hired through temporary service companies, as well as compliance with the procedures for updating employee data.
- To request the Compliance Officer for approval to contract employees, according to the Due Diligence process.
- To monitor Employees and report Unusual, Suspicious and Intended Transactions to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious or Intended Transactions.
- To structure and develop, in coordination with the Compliance Officer, training and coaching programs on the TBEP.
- To report to the Compliance Officer, the cases in which situations of violation of the TBEP have been found for analysis.
- To define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risks for their Mitigation.
- To ensure that all RA's workforce, including direct employees or people hired through temporary service companies, are aware of the TBEP; to accomplish this the Department must (i) make this Manual available to collaborators, (ii) have them sign the Employee Declaration Form (Annex G), and (iii) provide training to RA's personnel with the support of the Compliance Officer.
- To report and update employees' information in the records determined by RA.
- To establish appropriate and effective sanctioning procedures, in accordance with labor and disciplinary regulations with respect to violations of the TBEP.
- To carry out the monitoring of the sanctioning processes that are carried out regarding TBEP infractions.

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C.4. Global Finance Operations


- To report Unusual, Suspicious and Intended Transactions to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious and Intended Transactions.
- To maintain the financial information of the Counterparties up to date.
- To not allow the transfer of resources to third parties other than those who are legally engaged with the Company.
- To provide to the Compliance Officer the inputs required for reporting operations to the colombian authorities.
- To provide to the Compliance Officer the information required to monitor commercial relations with third-parties.

C.5 Marketing Department

- To support the Compliance Officer in the dissemination of the TBEP.
- To support the strategies defined by RA to achieve timely and effective communication of issues related to the C/TB.
- To monitor the different media outlets to detect situations that may put RA's reputation at risk.
- To define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risks for their Mitigation.
- To report Unusual, Suspicious and Intended Transactions to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious and Intended Transactions.

C.6. IT Department

- To provide support in the availability of tools that allow the execution of C/TB monitoring activities.
- To assist the Compliance Officer in the management and care of the digital archive of the data related to the management and prevention of the C/TB Risk.
- To define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risk for its Mitigation.

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- To support the strategies defined by RA aimed at achieving timely and effective communication of the TBEP among RA employees, providing the Compliance Officer with the necessary technological tools.
- To assist in the proper functioning of reporting channels such as the Compliance Officer's email, Online Risk Event Report, Physical mailbox for reporting Risk Events and the Ombudsman report channel.

C.7. Legal Department

- To provide legal advice to the Compliance Officer in the development of its activities.
- In coordination with the Compliance Officer, to provide legal guidance and advice to the company in the responses requested by the Control Organisms in matters of TBEP.
- To negotiate the inclusion of clauses that allow Termination of the contractual relationship in case the Counterparty is involved in C/TB issues in all the contracts signed by RA.
- To negotiate the inclusion of clauses that oblige the Counterparty to know and submit to the Manual in the contracts signed by RA.
- To verify that the operations, businesses, and contracts executed by RA comply with the Corporate Policies and the law.
- To assist the areas that may require assistance in the Due Diligence and Enhanced Due Diligence procedures.

C.8. Internal Control

- To report in writing to the Board of Directors, the Legal Representative, or the Compliance Officer, about compliance or non-compliance with the provisions contained in this Manual.
- To inform the Legal Representative and the Compliance Officer of any inconsistencies and shortcomings detected with respect to the implementation of the TBEP.
- To submit reports on compliance with the policies established by the Company regarding TBEP when requested to do so by any authority.
- To submit a report to the Compliance Officer when, during its audit work, the department identifies Unusual, Suspicious or Intended Transactions that may put RA at risk under the terms of this Manual.

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- To render a report to the Compliance Officer on compliance with this Manual, when requested by the Compliance Officer.

C.9. Operations Department

- To implement the procedures defined in the Corporate Policies regarding the Anti-Corruption Policy, Supplier Code of Conduct, as well as the Single Counterparty Declaration Form, for the effective knowledge and identification of the Suppliers directly contracted.
- Collect and validate the information provided by the Suppliers under its responsibility to verify that it is complete that it meets the Policies established by RA for its engagement, by analyzing its consistency and reasonableness.
- To validate that the Supplier, its Legal Representative, members of the Board of Directors and shareholders with an equity equal to or greater than 5%, are not reported in the lists defined in the Restricted Lists Policy.
- To define and identify Warning Signals and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risks for their mitigation.
- To execute the Supplier segmentation processes to determine their risk level. To do so, follow the provisions of the Procedure for the Identification, Measurement and Treatment of C/TB Risks for their Mitigation.
- To monitor the operations of Suppliers and report Unusual, Suspicious and Intended Transactions to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious and Intended Transactions.
- To assist in the execution of the updating strategies of the information of the Counterparties.
- To keep a record of all transactions carried out by RA with respect to the Suppliers under its control.
- To assess the Suppliers under their responsibility, in accordance with the parameters set forth in this Manual.
- To report and update the information of the Suppliers under their responsibility in the records determined by RA.

C.10. Integral Supply Chain

- To define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of C/TB Risks for their Mitigation.

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- To report Unusual, Suspicious and Intended Transactions in the development of their activities to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Suspicious and Intended Transactions
- To verify that the operations, business, and contracts executed by RA are in accordance with the Corporate Policies and the law.

C.11. Statutory Auditor

The statutory auditor must report to the appropriate authorities any act of C/TB that he/she becomes aware of in the course of his/her duties. In fact, Article 32 of Law 1778 of 2016, which adds numeral 5o of Article 26 of Law 43 of 1990, imposes on statutory auditors the explicit obligation to report to the criminal, disciplinary and administrative authorities, for the alleged commission of crimes, they detect in the performance of their duties, despite the professional secrecy, in the following terms:

"5. The statutory auditors shall have the obligation to report to the criminal, disciplinary and administrative authorities, acts of corruption as well as the alleged commission of a crime against the public administration, a crime against the economic and social order, or a crime against the economic patrimony that they have detected in the exercise of their office. They must also bring these facts to the attention of the corporate bodies and the management of the company. The corresponding complaints must be presented within six (6) months from the time the statutory auditor has knowledge of the facts. For the purposes of this article, the professional secrecy regime that protects the statutory auditors shall not be applicable".

In compliance with his duty, the statutory auditor must pay special attention to the alerts that may give rise to suspicion of an act related to possible acts of C/TB.


C.12. Ombudsman

RA employees can anonymously report C/TB Risk Events, as well as conduct or situations involving C/TB Risk, through the Ombudsman Alert line website, by email at ombuds@ra.rockwell.com; or by telephone at 1-800-522-3589 (USA).

The area in charge of monitoring these reporting channels must report monthly to the Compliance Officer on the reports submitted to the website or the absence of such reports.

C.13 All Rockwell Employees

All Rockwell personnel are responsible for knowing and complying with the TBEP, and for taking all actions they deem appropriate, in accordance with the global compliance policies and the local TBEP, to prevent the company from being used as an instrument to give legality to C/TB activities.

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V. STAGE 4: RISK IDENTIFICATION, RISK FACTORS, ASSESSMENT, AND CONTROL OF C/TB RISK IN RA

This stage comprises the Risk Analysis, aimed at planning, organizing, directing, and controlling the activities related to the identification and analysis of the risks to which RA is exposed in terms of C/TB.


The above, with the purpose of defining an appropriate organizational response to eliminate, minimize, retain, or mitigate them.

RA has a Corruption and Transnational Bribery Risk Matrix, developed in consideration of different Risk Factors (i.e., Country, Economic Sector, Third Party Risks, and others). The Risk Matrix has been built based on the Risk Events identified by the different areas of the Company.

The purpose of this stage is to fully identify the Risk Events derived from the Risk Factors in Rockwell and with this information to develop procedures that are appropriate to the risk in terms of materiality, size, structure, nature, countries of operation.

Considering that not all Risk Events can be foreseeable, the Risk Matrix must be reevaluated and updated once a year by the Compliance Officer, who will rely on the leaders of the different areas of the Company for these purposes.

Risk Events have been identified in the Risk Event Matrix (Annex A) of this Manual. Once a Risk Event has been identified, the RA employee who identifies it shall follow the Procedure for Identification, Measurement, and Treatment of C/TB Risks for its Mitigation.

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VI. STAGE 5: PROCEDURE FOR IDENTIFICATION, MEASUREMENT, AND TREATMENT OF C/TB RISKS FOR SUBSEQUENT MITIGATION

A. Procedure

As part of the TBEP, RA developed the following methodology for C/TB Risk assessment. This allows informed decisions to be made. The methodology involves the application of the following steps:

- (i) Identification of the Risk Event.
- (ii) Reporting through reporting channels.
- (iii) Inherent Risk Calculation
- (iv) Residual Risk Calculation
- (v) Decisions on the risk event
- (vi) Follow-up, Monitoring and Documentation

B. C/TB Risk Management

B.1 Activities to be performed by whoever identifies the Risk Event

1. Identification of the Risk Event

The Employee must identify the Risk Event in accordance with the Risk Matrix or following the parameters described in Annex A of this Manual. Subsequently, the Employee must collect all relevant information about the specific case for the overall assessment of the Risk Event.


2. Report to Compliance Officer

The official who has identified the Risk Event must report it to the Compliance Officer through any of the channels specified in Chapter III, Stage 2 of this Manual.

3. Probability Measurement

The Compliance Officer, once notified of the reported Risk Event, must identify its Probability of Occurrence, in accordance with the Matrix for Calculating the Probability of Occurrence included in Stage 5, Section C.1, of this Manual.

4. Impact Measurement

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The Compliance Officer must identify the Impact of the specific Risk Event, in accordance with the Impact Matrix included in Stage 5, Section C.1, of this Manual.

5. Inherent Risk Calculation

The Compliance Officer will calculate the Inherent Risk of the specific Risk Event, in accordance with the provisions of Stage 5, Section C.2, of this Manual.

6. Rating of the adopted Controls

The Compliance Officer will analyze the Controls described in the Risk Matrix and apply said controls in the Corporate Policies to mitigate the specific Risk Event.

7. Residual Risk Calculation

The Compliance Officer will calculate the Residual Risk of the specific Risk Event, in accordance with the provisions of Stage 5, Section D of this Manual.

8. Decision-making and documentation of the procedure

Once the result of the Residual Risk is available, the Compliance Officer will decide whether to continue with the execution of the activity or situation that generates the specific Risk Event.

9. Tracking and Monitoring

The Compliance Officer, with support from the relevant departments, will execute the tracking and monitoring actions defined in the Treatment Plan for the specific Risk Event documented in the Documentation Form for the Identification, Measurement and Treatment of C/TB Risks (Annex C).


C. Inherent Risk Analysis

The prevention of the C/TB Risk entails the need to identify the Inherent Risk regarding Risk Events. To identify Inherent Risk, it is necessary to measure the “Probability of Occurrence” of Risk Events, as well as the “Impact Measurement” of said Events. RA defined the following methodology to determine the level of Inherent Risk.

C.1 Probability of Occurrence and Impact Rating

Probability of Occurrence: Is the possibility that potential sources of risk materialize with respect to a Risk Event.

The Probability of Occurrence that a Risk Event will materialize must be classified as “very high”, “high”, “moderate”, “low”, or “very low”, according to the following table:


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PROBABILITY OF OCCURRENCE MATRIX				
Scale	Level	Possibility	Frequency	Probability
Very high	5	Happens every time	Daily	Greater than 90%
High	4	Happens most of the time	Monthly	Between 60% and 90%
Moderate	3	Possibly happens several times	Biannual	Between 40% and 60%
Low	2	Some chance of the event happening	Annual	Between 10% and 40%
Very low	1	Insignificant likelihood of the event occurring.	Every 5 years	Equal or less than 10%

Impact: The level of loss or damage that could result if the C/TB Risk materializes.

The following is the scale defined to measure the impact based on the Associated Risks (*i.e.*, legal, reputational, operational, contagion and economic impact). In the event that the Risk Event under evaluation entails any of these Associated Risks, the Risk Event must be classified as “catastrophic”, “major”, “moderate”, “minor” or “non-significant”.

IMPACT MATRIX						
Scale	Level	Legal	Economic impact	Reputational	Contagion	Operational
Catastrophic	5	Cancellation of registration or permanent closure of operations and business activities by decision of the competent authority.	Fines, legal expenses, and compensation for an amount equal to or greater than 12,000 SMMLV.	National and international media coverage with significant damage to the image of the companies that affects their market value.	It may lead to a contagion effect among all the companies in the business group led by the Parent Company.	Impossibility of having processes, resources, infrastructure, or technology to continue the operation.
Major	4	Suspension or partial closure of operations, activities, or removal of business directors by decision of the competent authority.	Fines, legal expenses, and compensation for an amount between 250 and 11,999 SMMLV.	Media coverage at a regional level that causes significant loss of clients.	It may lead to a contagion effect among some of the companies in the business group, including the Parent Company.	Temporary impact on processes, resources, infrastructure, or technology to continue the operation.
Moderate	3	Suspension or disqualification of directors, compliance officer and other officials by decision of the competent authority.	Fines, legal expenses, and compensation for an amount between 50 and 249 SMMLV.	Nationwide media coverage, causing moderate loss of customers or decreased revenue.	It may lead to a contagion effect among some of the companies in the business group, not including the Parent Company.	Partial impact of some processes, resources, infrastructure, or technology to continue the operation.
Minor	2	Reprimand by decision of the competent authority.	Fines, legal expenses, and compensation for an amount less than 49 SMMLV.	Local media coverage. Bad image, but without causing loss of clients or decrease in income.	It may lead to an effect between service line(s) related to RA.	Affectation of a specific process, resource, infrastructure, or technology to continue the operation.

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Non-significant	1	Requirement by decision of the competent authority.	There are no fines.	It does not affect reputation due to discredit, bad image, negative publicity.	It does not produce contagion effect	It does not cause any affectation.
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C.2 Inherent Risk Calculation

Inherent Risk: The level of Risk that results from multiplying the levels of Probability of Occurrence by the Impact, with the following formula:

$$IR = \text{Probability of Occurrence Value} * \text{Impact}$$

The result of the Inherent Risk obtained from the previous formula must in turn be located in a 5 x 5 Qualification Matrix, in which each of the quadrants will be assigned a level of Inherent Risk according to the result obtained. The highest possible value for Inherent Risk is 25, as set out below:


INHERENT RISK RATING MATRIX					
PROBABILITY					
Very high	5	10	15	20	25
High	4	8	12	16	20
Moderate	3	6	9	12	15
Low	2	4	6	8	10
Very low	1	2	3	4	5
	Non-significant	Minor	Moderate	Major	Catastrophic
IMPACT					

According to the result of the values obtained in the Inherent Risk equation, the risks will be located in the following Inherent Risk Matrix, where the risk level of each of the Factors must be evaluated. Said level of Inherent Risk is classified through severity scales, according to the combinations obtained in the previous Classification Matrix, namely:

INHERENT RISK MATRIX		
Scale	Level	Definition
Intolerable	5	Greater than 15
Extreme	4	Greater than 10 less than 15
High	3	Greater than or equal to 10
Moderate	2	Greater than or equal to 5
Low	1	Less than 5

D. Residual Risk Calculation

Once the level of Inherent Risk of the Risk Event has been analyzed, it is necessary to evaluate how the Controls that have been implemented in the Company can mitigate it. The result of this analysis makes it possible to identify the Residual Risk (final risk), which consists of determining to what extent the Inherent Risk is reduced or magnified by applying the Controls that the company has in order to reduce, transfer, mitigate or control the C/TB risk.

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This exercise allows RA to be aware, based on the identification of risks and mitigation alternatives, to determine the level of Residual Risk against Risk Events.

D.1 Qualification of Controls

The Controls within TBEP are defined as the Corporate Policies, activities and procedures aimed at mitigating adverse risks for compliance with the C/TB Risk prevention objectives. The different types, forms, classifications, and evaluations of Controls are explained below.

Types of controls:

- Preventive: It is applied to the cause of the risk and its generating agent to reduce the Probability of Occurrence.
- Detective: It is an alarm that is activated in the event of an abnormal situation, such as, for example, Warning Signs.

Forms of controls:

- Manual: The actions carried out by the people responsible for a process or activity.
- Automatic: The procedures applied from a computer in support software designed to prevent, detect, or correct errors or deficiencies without manual operation in the process.


Implementation rating:

- Implemented: The required Control exists and functions appropriately.
- Developing: The Control exists, but it has not yet had the required effects.
- Does not exist: The Control has not been designed or implemented.

D.2. Assessment of Controls

Once the Controls applicable to a specific Risk Event have been identified, they must be rated according to their state of implementation, considering the following scale:

CONTROLS RATING MATRIX		
Scale	Level	Definition
Non-existent	5	No control activities to mitigate C/TB risk are in place or carried out.
Weak	4	There are weaknesses regarding the design or implementation of the Control and important modifications are required for its improvement.
Acceptable	3	Formal and informal activities are carried out to partially mitigate or manage (not preventively) the C/TB Risk.
Moderate	2	Formal and informal activities are carried out to partially mitigate or manage the C/TB Risk in a Preventive manner.
Strong	1	Sufficient activities are carried out to mitigate or fully manage the C/TB Risk.

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To identify the specific Controls adopted by RA regarding Risk Events and their implementation status, the Compliance Officer must refer to the Risk Matrix and the Corporate Policies, as well as any other additional process that implies a control under the terms of this Manual.

D.3. Residual Risk Calculation

Once the Control(s) have been identified, the Compliance Officer must, with help from the hierarchical superior, find whether there is a Policy or Methodology related to the specific Risk Event, and generate the Control rating. With the Control rating and the result of the Inherent Risk, the Residual Risk must be calculated.

The calculation of Residual Risk allows to identify the definitive risk level to take into account when making the corresponding decision.

Residual Risk: The level of Risk that results from multiplying the level of Inherent Risk by the level of Control Rating, with the following equation:


Residual Risk (RR) = Inherent Risk Level * Control Rating Level

The true exposure of RA to the Risk Event is determined according to the result of the Control assessment. The result obtained must be in the Residual Risk Matrix, where the displacement of risks is observed due to the effect that the Controls have on them. The abovementioned matrix is shown below:

RESIDUAL RISK RATING MATRIX					
INHERENT RISK					
Intolerable	5	10	15	20	25
Extreme	4	8	12	16	20
High	3	6	9	12	15
Moderate	2	4	6	8	10
Low	1	2	3	4	5
	Strong	Moderate	Acceptable	Weak	Non-existent
CONTROL QUALIFICATION					

According to the result of the values obtained in the Residual Risk equation, the risks shall be rated according to the following Residual Risk Qualification Matrix, where the risk level of each of the Events will be evaluated. Such risk level is classified through severity scales, according to the combinations obtained in the previous Residual Risk Classification Matrix, namely:

RESIDUAL RISK MATRIX		
Scale	Level	Definition
Intolerable	5	Greater than 15
Extreme	4	Greater than 10 less than 15
High	3	Greater than or equal to 10
Moderate	2	Greater than or equal to 5
Low	1	Less than 5

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Once the Residual Risk rating has been obtained, the Compliance Officer shall evaluate the feasibility of proceeding with the activity, being clear whether it is a moderate, low, high, or extreme risk. In Events whose evaluation shows an "Intolerable" Residual Risk, RA will not proceed with the activities or actions tending to its consummation.

For other cases, the Compliance Officer must analyze the specific case and decide whether to carry out the action or not, determine the Treatment Plan and implement the corresponding Monitoring actions.

In all cases, the decision must be documented by the Compliance Officer by completing the C/TB Risk Decision Report Form.

E. Treatment of C/TB Risks

E.1 C/TB Risk Treatment Plans

In the event that a Residual Risk is found associated with a Risk Event with which it is intended to move forward, there must be a Treatment Plan leading to the fulfillment of any of the following objectives:

- Avoid the risk
- Reduce the Probability of Occurrence of risks or reduce their impact
- Accept the risks
- Transfer risks (contracts or insurance)


Such Treatment Plan shall be documented in the C/TB Risk Decision Report Form and meet and identify the following minimum requirements:

- Objective of the Treatment Plan.
- Description of the action to be carried out: definition and characteristics of the treatment.
- Priority of action or treatment (high, Moderate, or low).
- Who is responsible for implementing Monitoring.
- What resources are going to be used.
- Monitoring Periodicity.

Specifically, the Treatment Plan must be designed following one of the described objectives and complying with the stated requirements, in such a way that the Monitoring actions and those responsible are clearly defined.

E.2 Monitoring and control of the Treatment Plan

In order to monitor and control the operations of the Counterparties defined in the Treatment Plan, the Compliance Officer must constantly monitor them in order to detect any irregularities that may

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imply adopting a different position from the decision taken at the time of implementing the Treatment Plan. This analysis must follow at least the following issues:

- Knowledge of the market, to identify strange behaviors of the Counterparty related to its competition.
- Understanding of the typologies of C/TB operations, as well as the Methodology for the analysis and reporting of Unusual, Attempted and Suspicious Operations.
- Identification of Warning Signs.

The monitoring and control of the operations of the Counterparties will have to be carried out with the general periodicity, defined in this Manual, and specific, as defined for each Counterparty by the Treatment Plan.


F. Due Diligence and Enhanced Due Diligence Procedures

One of the main tools to prevent and control the C/TB Risks to which the Company is exposed is the implementation of Due Diligence procedures, which must be performed within the Company's operations. For the definition of the extent to which the Due Diligence measures must be applied, a specific analysis of the operations, product, contracts, counterparties, countries, geographical areas, channels, and activity developed, which must be appropriate for the nature and size of the business, is required.

F.1. Due Diligence

The Company must adopt Reasonable Due Diligence Procedures for the knowledge of the Counterparty, to this end, it must adopt the following minimum measures prior to its relationship with third parties:

- To identify the Counterparty and verify its identity using documents, data, or reliable information from independent sources.
- To identify the Counterparty's Beneficial Owners and take Reasonable Measures to verify their identity.
- In the case of Legal Entities, Reasonable Measures must be taken to know the structure of their ownership to obtain the name and identification number of the Beneficial Owners. The measures taken must be proportional to the level of risk and its tangibility or complexity induced by the ownership structure of the company or the nature of its shareholders with a shareholding percentage greater than five percent (5%).
- To understand, and when appropriate, to obtain information on the purpose and intended nature of the business relationship.

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- To conduct continuous Due Diligence of the business relationship and review transactions conducted throughout that relationship to ensure that the transactions are consistent with the Company's knowledge of the Counterparty, its business activity and risk profile, as well as of the source of funds giving rise to the business relationship.
- To constantly consult the Binding Lists of the Superintendence of Corporations, thus ensuring compliance with international and national obligations for risk prevention.
- To have a database containing the following information regarding the Counterparties: name of the Counterparty, whether natural or legal entity, identification, domicile, beneficial owner, name of the legal representative, name of the contact person and position held, date of the process of acknowledgement and monitoring of the Counterparty.
- To monitor and update the Due Diligence process once every two (2) years or whenever necessary according to changes in legal, contractual, and/or reputational conditions related to the Counterparty, and not limited only to the time of engagement.
- If any property, Asset, Product, fund or right owned or under administration or control of any country, person or entity included in the Binding Lists is identified, the Compliance Officer shall immediately report it to the UIAF and bring it to the attention of the Attorney General's Office.


The Company, prior to the start of the contractual or legal relationship, must have complied with the Due Diligence procedures that are part of the PTEE, attaching, to that effect, all the supports that prove it. Likewise, the linking of the Counterparty must have been approved by the Compliance Officer.

Exceptionally, and in accordance with the C/TB Policy, the Company may complete the verification after the commercial relationship has been established. The request and authorization for exceptional contracting must be duly documented.

If in these exceptional events, the Company is unable to perform the Due Diligence satisfactorily once the business relationship is established, the Company shall evaluate the continuity of the Contractual relationship.

F.2. Due Diligence for Public Entities

Within the framework of the Due Diligence of Public Entities of the national, departmental, and municipal order, except in the case of industrial and commercial companies of the State, public capital companies or mixed economy companies, the approval of the Compliance Officer may be requested, indicating at least (i) the identification of the public entity; and (ii) the purpose and nature of the relationship. In these cases, it will not be necessary to attach the Counterparty Declaration Form or supporting documentation.

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F.3. Exceptional approval as a matter of urgency

The Compliance Officer may be asked for approval to provisionally contract with a third-party without the presentation of the Single Counterparty Declaration Form and other documents required for its verification, in the following cases:

1. Signing the contract with the supplier is considered urgent, since failure to make the purchase could affect the normal course of the operation.
2. Clients with complex corporate structures that prevent the easy processing of the Single Counterparty Declaration Form and other required documents.
3. Critical clients for whom, at the time of signing the contract, it has not been possible to process the Single Counterparty Declaration Form and other required documents.

The request to the Compliance Officer must indicate: (i) the third-party company name, type of identification and identification number, as well as (ii) the purpose of the contract to be signed with the third party, (iii) the estimated (monthly and annual) value to be contracted with the third-party, and (iv) the reasons for requesting exceptional approval due to urgency.

The Compliance Officer shall grant the appropriate term to send the supporting documentation required for the final approval of the third party.


F.4. Enhanced Due Diligence

The Enhanced Due Diligence process involves advanced knowledge of the Counterparty and the origin of the Assets being received, which includes activities in addition to those carried out in the Due Diligence.


Enhanced Due Diligence should be applied to:

- Counterparties and their Beneficial Owners that
 - Are considered by the Company to represent a higher risk.
 - Are identified as PEP; which shall extend to (i) spouses or permanent partners of the PEP, (ii) relatives of the PEP, up to the second degree of consanguinity, second degree of affinity, and first civil degree; and (iii) Close Associates; and
- Counterparties that carry out activities with Virtual Assets.
- Counterparties located in countries identified by FATF as non-cooperative and high-risk jurisdictions.

In addition to the common measures of the Know Your Counterparty procedure, the Company in the Enhanced Due Diligence process must:

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- Obtain approval from the Compliance Officer for the linkage or to continue the relationship, decision to be documented in the Documentation Form for the Identification, Measurement, and Treatment of C/TB Risks for each particular case.
- Adopt Reasonable Measures to establish the origin of the resources; and
- Carry out a semi-annual and intensified monitoring of the contractual relationship.

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VII. STAGE 6: DOCUMENTATION, DISCLOSURE AND TRAINING

The correct implementation of the TBEP depends primarily on a strong training and disclosure campaign within the company, accompanied by clear processes on how to report Risk Events and documentation of the System. Consequently, the Company has the obligation to correctly document and record everything related to the TBEP, to ensure the integrity, timeliness, reliability, confidentiality, and availability of the information, for which it has a clear Documentation Retention Policy.


Processes and activities must be documented in accordance with the mentioned policy and must comply with the following principle: all transactions, minutes, reports, decisions, reports, analyses, activities, and Management Plans related to the TBEP must be documented and filed under the custody of the Compliance Officer. Likewise, to have a successful implementation, RA has defined procedures for disclosure and training of the System, which are defined in this chapter.

The information provided by the Counterparty, as part of the Due Diligence and Enhanced Due Diligence process, as well as the name of the persons in charge of the verification, must be duly documented with date and time, so that the due and timely diligence can be accredited within the Company's knowledge of the counterparty.

A. Documentation of the TBEP, its stages and elements

RA must document the next processes:

- The Transparency and Business Ethics Program, with its corresponding annexes
- The development of the provisions of the Procedure for the Identification, Measurement, and Treatment of C/TB Risks for their Mitigation. It must be documented by filling out the C/TB Risk Decision Report Form.
- Documents supporting the design, development, and implementation of the TBEP methodologies.
- Documents and records evidencing the effective operation of the System, which include, among others, the documentation and information of the Counterparties and the documentation related to the reporting of Unusual, Intended and Suspicious Transactions.
- Reports to the Board of Directors, rendered by the Legal Representative, the Compliance Officer, and the Statutory Auditor.
- Documents that support the evolution of the Controls.
- Documents by means of which the authorities require information and their responses.

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- The documentation related to the disciplinary processes carried out for breaches of the System.
- Plans, programs and support for training and campaigns to disclose the System.
- All additional documentation that supports the system in any way.


All reports shall be filed under the custody of the Compliance Officer, or the person delegated by him/her.

B. Training Program and Disclosure Plan

B.1 Training Program

RA has a Training Program, which must be completed by all Employees who have recently joined the Company and those who are already part of it, at least once (01) a year. It is the main element of communication of the TBEP within RA and is implemented in compliance with the Training Policy, which defines the frequency of the content and assigns the Compliance Officer as responsible for it. As a result of the training, all involved parties must be able to identify what an Unusual or Suspicious Transaction is and the procedure to report it. The general conditions of the Training Program are described below:


- The Training of the System must be conducted at least once (01) a year.
- The training must be given during the onboarding process of new Employees under the supervision of the Compliance Officer.
- The training material must be constantly reviewed and updated by the Compliance Officer, or the person delegated by him/her.
- The training must include mechanisms for evaluating the results obtained, to determine its effectiveness and compliance with the proposed objectives.
- To disclose the Policies and procedures by means of the handing out of this physical and/or digital document in the corresponding onboarding processes.
- The training will be given in person or virtually, with the support of a presentation describing its objectives, main elements, responsible parties, forms, and procedures to be followed.
- The Company's onboarding training must have a format to be read and understood by the employees who receive it (Annex J).
- The training must be documented with attendance minutes that include the names of the attendees, date and issues discussed during the training.

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B.2 Disclosure Plan

RA has a Disclosure Plan that aims to keep all its Clients and Suppliers aware of the existence and updates of the TBEP, the obligation to comply with it, the penalties for breach and the implementation status. This plan uses different strategies and means of communication, namely:

- Having contractual clauses where the Counterparties manifest that they have read, understood, and abide by the RA TBEP Manual.
- Training sessions that should be provided during the induction process for new contractors or clients.
- Disclose the policies and procedures through the delivery of this physical and/or digital document in the corresponding induction processes.
- At least once a year, make known the obligation to comply with the TBEP, the penalties for breach and its state of implementation. For such purposes, tools such as mass e-mails, publications on information boards and on the internal RA website, videos shown at meetings, among others, will be used.


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VIII. STAGE 7: SANCTIONING REGIME

Non-compliance or violation of TBEP's policies and standards constitutes a serious offense. Consequently, and in appropriate cases, the provisions of the Code of Conduct will be applied, as well as the procedures and sanctions established by the Internal Work Regulations.


In the training and disclosure sessions, the sanctions that will result from not complying with the System Policies and related rules will be made known.

It is RA's responsibility to verify that the employees fully comply with the instructions given and that any Risk related to C/TB is immediately brought to the attention of the Compliance Officer.

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IX. SCOPE OF APPLICATION


The Compliance Manual was prepared by the Compliance Officer and presented with the Legal Representative to RA's Board of Directors. It has been approved by the Board of Directors and is therefore mandatory for all RA Employees, officers, auditors and contractors.

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X. ANNEXES

ANNEX A – RISK MATRIX


TBEP CONTROL MATRIX		
COUNTRY		
EVENT	WARNING SIGNALS	CONTROL
Highly sophisticated contractual terms	Foreign operations whose contractual terms are highly sophisticated.	Review and approval by the Contracts and Legal team, who make an exhaustive reviewing and prior verification of contractual terms and conditions with third parties.
Wire transfers to tax havens	Transfer of funds to countries classified as tax havens.	<p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer validates the countries of operation to identify if they are tax havens, and if so, perform an Enhanced Due Diligence process to identify the origin of the goods and funds related to the company.</p> <p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to engagement the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer validates the countries of operation to identify if they are tax havens, and if so, performs an Enhanced Due Diligence process to identify the origin of the goods and funds related to the company.</p>
ECONOMIC SECTOR		
EVENT	WARNING SIGNALS	CONTROL
Risky commercial activities	Awareness that the Counterparty engages in commercial activities in an industry considered to be a high risk for C/TB and/or other criminal conduct in the territory in which the Counterparty conducts its business	<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the vendors engagement and aims to have knowledge about the origin of its resources, activities, countries of operation, final beneficiaries,</p>

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		<p>application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer performs an analysis of the company's corporate purpose and asks the supplier for a statement of the activities it performs to identify whether it is a risk activity.</p> <p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer performs an analysis of the company's corporate purpose and asks the client for a statement of the activities it performs to identify whether it is a risk activity.</p>
THIRD PARTIES		
EVENT	WARNING SIGNALS	CONTROL
The identity of the parties/origin of the funds is unclear.	Transactions where the identity of the parties or the source of funds is unclear	<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendors and aims to have knowledge about the origin of its resources, activities, countries of operation, beneficial owners, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer requests the completion of the Single Counterparty Declaration Form, which provides information on the origin of the company's assets and funds.</p> <p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer requests the completion of the Single Counterparty Declaration Form, through which information is</p>

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		provided on the origin of the company's assets and funds.
		<p><u>Conflict of Interest Disclosure Workflow Process:</u></p> <p>The Ethics and Compliance program contains a flow chart identifying the process disclosure for situations constituting conflict of interest.</p> <p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer requests the necessary documentation to identify the corporate purpose of the company and the type of legal structure with which the linkage is made.</p> <p>The declaration of beneficial owners is also requested, to identify the origin and destination of the resources of the linked vendor.</p> <p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer requests the necessary documentation to identify the corporate purpose of the company and the type of legal structure with which the linkage is made.</p>
Conflicts of interest	Transactions in which a conflict of interest is clearly evidenced since they involve an employee and the Company that imply the detriment of the Company in favor of an employee.	The declaration of beneficial owners is also requested, to identify the origin and destination of the resources of the linked client.
Complex or international legal structures with no apparent commercial, legal or tax benefits.	Complex or international legal structures with no apparent commercial, legal or tax benefits or that own and control a legal entity with no business purpose, particularly if it is located abroad.	<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendors and aims to have knowledge about the origin of its resources, activities,</p>

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		<p>countries of operation, final beneficiaries, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer requests the necessary documentation to identify the corporate purpose of the company and the type of legal structure with which the linkage is made.</p> <p>The declaration of beneficial owners is also requested, in order to identify the origin and destination of the resources of the linked vendor.</p> <p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer requests the necessary documentation to identify the corporate purpose of the company and the type of legal structure with which the linkage is made.</p> <p>The declaration of beneficial owners is also requested, to identify the origin and destination of the resources of the linked customer.</p>
Triangulation of payments with complex legal structures	Request for payments to third parties outside the contractual relationship, or invoicing by third parties other than the contractually bound entities.	<p><u>Payment policy:</u></p> <p>Rockwell has a strict payment dispersal policy, which includes validation and coding of the third party (vendor, customer and employee) in its central system, and the Due Diligence process. Thus, is the duly approved and codified third party that is the only entity that is allowed to receive payments from Rockwell, being strictly prohibited the payment to any third party, intermediary, authorized agent or any other structure.</p>
Non-operating corporations with no commercial purpose.	Non-operating companies under the terms of Law 1955 of 2019 or that, due to the conduct of business, may be considered as "paper" entities, i.e., that reasonably do not fulfill any commercial purpose.	<p><u>PR - SSO - 002 Selecting and registration of suppliers and contractors for indirect purchases:</u></p> <p>The organization has mandatory procedures that aim to validate the existence and validity of third parties.</p>

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Corporations declared as fictitious suppliers.	Corporations declared as fictitious suppliers by DIAN	<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer performs the Due Diligence process, which includes checking whether the linked vendor is classified as a fictitious supplier by the National Tax and Customs Directorate ("DIAN" for Spanish translation).</p>
Legal entities where no beneficial owner may be identified.	Legal entities where no beneficial owner may be identified.	<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer requests the declaration of beneficial owners in the provisions of Resolution 164 of 2021 issued by the "DIAN" to determine which persons are or should be understood as the company's beneficial owners.</p> <p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>Particularly, the Compliance Officer requests the declaration of beneficial owners in the provisions of Resolution 164 of 2021 issued by the "DIAN" to determine which persons are or should be understood as the beneficial owners of the company.</p>
Contracts that appear to be legal without precise duties and obligations.	Contracts with Contractors or state entities that give the appearance of legality that do not reflect precise contractual duties and obligations.	<p><u>PR - SSO - 002 Selecting and registration of suppliers and contractors for indirect purchases:</u></p> <p>The organization has mandatory procedures that aim to validate the existence and validity of third parties</p>

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Contractors with a single client.	Contracts with Contractors providing services to a single client.	
Unusual losses or gains or significant changes in contracts.	Unusual losses or gains on contracts with Contractors or state entities, or significant changes without business justification.	<u>Procedure for periodic review of commercial relationships:</u> The Compliance Officer performs a periodic review of commercial relationships and their development, to identify that the payments made are consistent with the purpose of the contracts, the reality of the market and the corporate purpose of the related third party.
Variable compensation/ cash payments/ virtual assets.	Contracts that contain variable compensation that is not reasonable or that involve payments in cash, in Virtual Assets (as defined in Chapter X), or in kind.	<u>Cash handling policy:</u> Rockwell since Global Finance Operations prohibits cash payments or transactions, all payments are made by wire transfer, direct debit and PSE. Additionally, the Cash Handling Policy provides for a maximum amount of USD300 for cash transactions. <u>Objective report of cash transactions:</u> On a monthly frequency, the Compliance Officer requests confirmation from the area in charge, for cash transactions in excess USD\$2.272 in order to report to the UIAF any novelties.
Payment of PEPs	Payments to PEPs or persons close to PEPs.	<u>New vendors on-boarding procedure:</u> This procedure is performed prior to the engagement of the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, beneficial owners, application of Compliance programs, linkage with PEPs. In particular, the Compliance Officer performs a Due Diligence process in which identifies people classified as PEPs linked to the vendor and applies the Enhanced Due Diligence process described in this manual. <u>New client on-boarding procedure:</u>

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		<p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer performs a Due Diligence process in which he identifies people classified as PEPs linked to the customer and applies the Enhanced Due Diligence process described in this manual.</p>
Payments with no apparent justification	Payments to related parties of the company (Associates, Employees, Subordinate Companies, branches, among others) without apparent justification.	<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, beneficial owners, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer in charge of linking the supplier, analyze the object of the contractual relationship and the value of the contract in the company's internal Integrated System, and it must justify the payment to be made.</p> <p><u>Procedure for periodic review of commercial relationships:</u></p> <p>The Compliance Officer performs a periodic review of commercial relationships and their development, to identify that the payments made keep coherence with the object of the contracts, the reality of the market and the corporate purpose of the related third party.</p> <p><u>Cost Center - Decision Authority:</u></p> <p>All invoices and orders are approved by the person in charge according with the limits on the amounts for the approvals of the persons in charge (Decision Authority). In case the amount is higher than the limit, the system sends the invoice to the superior until the person with the sufficient limit approves it.</p>
Companies owned by public officials, customers, or suppliers.	Contracts with companies whose owner is a relative of the public official, client, or supplier.	<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the supplier and aims to have knowledge about the origin of its resources, activities, countries of operation, beneficial</p>

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		<p>owners, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer performs a Due Diligence process in which he identifies people classified as PEPs linked to the vendor, and applies the Enhanced Due Diligence process described in this manual.</p> <p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer performs a Due Diligence process in which he identifies people classified as PEPs linked to the customer and applies the Enhanced Due Diligence process described in this manual.</p>
Money from third parties	Acceptance or offering of money from third parties for the purpose of influencing a decision, action, or omission.	<p><u>Code of Conduct - Internal Work Regulations:</u></p> <p><u>The acceptance or offer of money coming from third parties to influence a decision action or omission is one of the conducts prohibited by the Code of Conduct, which, in accordance with the company's Internal Work Regulations ("RIT" for Spanish translation), may result in a sanction for the employee who executes the conduct.</u></p>
Political Party	The counterparty has a close relationship with a political party.	<p><u>Code of Conduct and Global Anti-Corruption Policy:</u></p> <p>Employees responsible for relations with counterparties establish a selection process to determine that they deal ethically, and that they understand and apply this policy.</p> <p>Failure to comply with this policy entails financial and disciplinary sanctions.</p> <p><u>Political Campaign Contribution Policy:</u></p> <p>Contributions to political campaigns of any kind by AR are prohibited.</p> <p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendor and</p>

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		<p>aims to have knowledge about the origin of its resources, activities, countries of operation, beneficial owners, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer performs a Due Diligence process through which a review of disciplinary or fiscal liability background is performed.</p>
		<p><u>New vendors on-boarding procedure:</u></p> <p>This procedure is performed prior to the engagement of the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, beneficial owners, application of Compliance programs, linkage with PEPs.</p> <p>In particular, the Compliance Officer performs a Due Diligence process through which a review of disciplinary or fiscal liability background is performed.</p> <p><u>New client on-boarding procedure:</u></p> <p>This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs.</p> <p>In particular, the Compliance Officer performs a Due Diligence process through which a review of disciplinary or fiscal liability background is performed.</p> <p><u>New employees hiring process:</u></p> <p>This procedure is performed prior to the hiring of the employee and aims to have knowledge about the candidate to employee, through the review of restrictive lists, as well as the inquiry of the quality of PEP.</p> <p>In particular, the Compliance Officer performs a Due Diligence process through which a review of background related to disciplinary or derived from fiscal liability is performed.</p>
C/TB Background	The counterparty has a history of C/TB	
OTHERS		
EVENT	WARNING SIGNALS	CONTROL

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Alteration of documents	Identification of alteration in public or private documents.	<p><u>Procedure for verifying misconduct - Internal Work Regulations:</u></p> <p>The control for situations in which inaccurate reports or erroneous information are issued is framed in the Procedure for Verification of Misconduct of the Internal Work Regulations by which it is intended to know the particular situation that led to the commission of the conduct.</p>
Inaccurate reports or erroneous information.	Inaccurate reports or erroneous information.	<p><u>Procedure for verifying misconduct - Internal Work Regulations:</u></p> <p>The control for situations in which inaccurate reports or erroneous information are issued is framed in the Procedure for Verification of Misconduct of the Internal Work Regulations by which it is intended to know the particular situation that led to the commission of the conduct.</p>
Improper use of confidential information.	Improper use of confidential information.	<p><u>Procedure for verifying misconduct - Internal Work Regulations:</u></p> <p>The control for situations in which inaccurate reports or erroneous information are issued is framed in the Procedure for Verification of Misconduct of the Internal Work Regulations by which it is intended to know the particular situation that led to the commission of the conduct.</p>
False or inaccurate invoices	Invoices that appear to be false or do not reflect the reality of a transaction or are inflated and contain excess discounts or reimbursements.	<p><u>Invoice processing procedure:</u></p> <p>The area in charge of processing invoices, processes them through the 'Sovos' software, which allows the registration of invoices only under the legal guidelines allowed.</p> <p>The employee in charge of approval is responsible for verifying the</p>

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		documents and the values reflected in them.
		<u>New vendors on-boarding procedure:</u> This procedure is performed prior to the engagement of the vendor and aims to have knowledge about the origin of its resources, activities, countries of operation, beneficial owners, application of Compliance programs, linkage with PEPs. In particular, the Compliance Officer requests the necessary documentation to identify the corporate purpose of the company and the type of legal structure with which the link is made. The declaration of beneficial owners is also requested, to identify the origin and destination of the resources of the linked vendor. <u>New client on-boarding procedure:</u> This procedure is carried out prior to the client engagement and aims to gain knowledge about the origin of its resources, activities, countries of operation, final beneficiaries, application of Compliance programs, and linkage with PEPs. In particular, the Compliance Officer requests the necessary documentation to identify the corporate purpose of the company and the type of legal structure with which the relationship is made. The declaration of beneficial owners is also requested, to identify the origin and destination of the resources of the linked customer. <u>Procedure for periodic review of commercial relationships:</u> The Compliance Officer performs a periodic review of commercial relationships and their development, to identify that the payments made keep coherence with the object of the contracts, the reality of the market and the corporate purpose of the related third party.
Transactions that are not part of the ordinary course of business of the company.	Transactions that are not part of the ordinary course of business of the company.	

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ANNEX B - TBEP CORPORATE POLICIES FOR C/TB RISK PREVENTION

The following is a detailed description of the Policies that make up the TBEP.

A. TBEP General Policies


It is RA's duty, its shareholders, its Board of Directors, its Compliance Officer, and other officers and contractors, to comply with the following obligations:

- To ensure the execution and compliance with the rules related to this Manual.
- To ensure the efficient implementation of internal control activities incorporated in the processes for which they are responsible.
- To have updated databases of their Counterparties, clarifying that they must have the respective authorization for the processing of such data.
- To ensure that the information contained in the Company's databases is complete, updated, and consistent with the documentary supports.

A.1. Policy on Consultation of Restrictive Lists

RA will perform the queries and cross-checks of information of the counterparties with the following Restricted Lists:

- United Nations Security Council Restrictive Lists.
- OFAC or Clinton List.
- INTERPOL List.
- National Police Judicial Record List.
- United States of America Terrorist Lists.
- European Union list of individuals, groups and entities involved in terrorist acts and subject to restrictive measures.
- Most Wanted - FBI
- Most Wanted - DEA
- Comptroller General of the Republic.
- Office of the Attorney General of the Nation.
- United Nations Security Council.
- Attorney General's Office background information.

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- List of Fictitious Suppliers DIAN
- Background of National Police
- Consultation of Judicial Branch Proceedings with Convictions and in progress.
- World Bank Sanctions Lists
- IDB Sanctions List
- Any other list indicated by the Superintendence of Corporations (see https://www.supersociedades.gov.co/delegatura_aec/Paginas/multimediaLAFT.aspx#listas_vinculantes).

These consultations must be carried out mandatorily for all Counterparties and prior to their engagement. However, the information of the Counterparties on Restricted Lists will also be verified each time the contractual relationships with them are renewed or extended.

Regarding RA's Employees and contractors, the verification will be done on an annual basis. The Counterparties that within their organization have PEPs or that are incorporated in tax havens (as defined by law) will be verified every 6 months.


Verifications in Restricted Lists will be made based on the name and Tax Identification Number of the Counterparty, as well as on the name and identification of its legal representatives, members of the Board of Directors and shareholders with an interest equal to or greater than 5% of the capital stock. In the case of natural persons, it will be done with their name and identification document.

RA must have information on who are the beneficial owners and/or controlling shareholders of the respective Counterparties, i.e., it must be able to determine the company or natural person that has the final effective control over a legal entity or holds 5% or more of the equity interest. For this purpose, in the documents to be signed by the Counterparties, it shall request that the shareholding interest be indicated.

The Company shall refrain from engaging with Counterparties that are reported in these lists, or are involved in a criminal investigation with indictment, or reported by supervisory agencies such as the Superintendence of Finance of Colombia, the Superintendence of Corporations, among other entities.

No officer may authorize any operation, service, support, or contract of any kind with those who appear on the Restricted Lists, under penalty of being subject to sanctions that could result in justified dismissal, unless an exception is established with the authorization of the hierarchical superior and validation of the Compliance Officer.

A.2 Suppliers, Customers and Employees knowledge and engagement policy

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RA has defined the mechanisms to implement, maintain, comply with, and control the policies or guidelines for the knowledge of Counterparties, from their selection, engagement, permanence, until the termination of relations, as well as the monitoring of operations, in accordance with the procedures established in the TBEP and other rules defined for this purpose. To this effect, at the time of entering a contract with a Counterparty, the Single Employee Declaration Form (Annex G) or the Single Counterparty Declaration Form (Annex I) must be signed, and the Procedure for Identification, Measurement and Treatment of C/TB Risks for their Mitigation (Annex C) must be documented, if applicable.

Additionally, the company shall foresee processes that allow for an effective, efficient, and timely knowledge of current and potential counterparties. Specifically, those processes that, through Due Diligence, will enable the company to know its Final Beneficiaries, the origin of their resources and verify their economic activity, as well as the confirmation of the information provided and its corresponding documents.

For the engagement with Counterparties, the Single Counterparty Declaration Form must be completed and signed. The purpose is for the third parties themselves to certify the activity they engage in and whether they present C/TB Risk, whether they have a TBEP, the origin of their funds, the Jurisdictions in which they operate and who their beneficial owners are, to have sufficient knowledge about them. For the development of the Due Diligence process by RA, the activities described in this Manual shall be developed.


Due Diligence and counterparty knowledge is a process of continuous follow-up and monitoring, for this reason the Company shall have databases or mechanisms to consolidate and identify present or future warning signals. Therefore, the Due Diligence procedure shall be carried out with a periodicity and regularity of at least once every two (2) years or whenever it is deemed appropriate based on changes in the legal, economic, or reputational conditions of the Counterparty, ensuring that the verification process is not limited to the moment of the engagement.

Additionally, the Company shall apply an Enhanced Due Diligence procedure in the cases indicated in this Manual.

A.3 Policy on business cooperation, acquisitions, mergers and virtual or non-face-to-face businesses

Prior to the execution of business cooperation operations (i.e., consortiums, temporary unions, or joint ventures) or acquisitions and mergers of RA with other companies, a due diligence process must be carried out to obtain adequate knowledge of the third parties with whom this type of business is to be carried out.

This process of verification in Restricted Lists includes the verification of the corporate name and Tax Identification Number of the Counterparty, its shareholders, Legal Representative, and members of the Board of Directors.

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If a certain business does not require the physical presence of the parties, the Company shall adopt the necessary measures for the identification of the natural or legal entity with whom the business will be carried out and the origin of the resources that are part of the transaction.

A.4 Policy for new market incursion or new product launches

Prior to the launch of any Product, the modification of its characteristics, the incursion into a new market or the start of operations in new national or international Jurisdictions, the identification and evaluation of the risks associated with C/TB must be carried out.

For this purpose, the leaders of each area must make an evaluation of the C/TB Risk associated with these new operations, designing the controls for their mitigation, and recording this analysis in order to decide on their feasibility, as well as the convenience of these operations for RA.


A.5 Politically Exposed Persons knowledge and engagement policy

Businesses that are executed or intended to be executed with persons who occupy or have occupied important public positions or who, by reason of their position, handle public resources, require stricter verification processes. By virtue of these advanced verification processes, such persons must declare their status in the respective Single Counterparty Declaration Form (Annex I) and state that they have authorization from the public entity to which they belong, or from which they manage their resources, or that they have been independent from it for more than 3 years, to be able to carry out the business activity with RA.

To identify a Counterparty as a PEP, RA considers as such the Counterparties that hold the following positions:

In the public sector:

- President and Vice President of the Republic.
- Ministers of State.
- Magistrates of the high courts (Constitutional Court, Supreme Court of Justice, Council of State and Superior Council of the Judiciary).
- Attorney General of the Nation, Comptroller General and Attorney General of the Republic.
- National Registrar of Civil Status, Ombudsman, Accountant General of the Nation.
- Senators and Representatives of the Congress of the Republic.
- Directors of Public Entities.
- Mayors of relevant municipalities (that agglutinate 0.2% of the total population of the country).
- Maximum heads of political parties.
- Candidates to the Presidency of the Republic.
- Notaries of capital cities.
- Superintendents or directors of State agencies.

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In the private sector:

- Directors, Managers or Legal Representatives of mixed economy companies.

It should be noted that this list is not exhaustive and that it is possible that some Counterparties, due to the nature of their operations, may be defined as PEPs by RA after this analysis.

The status as a PEP will disappear after at least three years have elapsed since the cessation of the exercise of the functions that give it this status.

If the Counterparty responds affirmatively regarding its PEP status or RA detects such status during the engagement process, the engagement must be approved by the competent body, in accordance with the terms of the Procedure for Identification, Measurement and Treatment of C/TB Risks for their Mitigation (Annex C). The counterparties identified as PEP must be marked in the system with this condition and a database will be kept for this purpose.

A.6 Counterparty Information Update Policy

As part of the Due Diligence in the Know-your- Counterparties, RA has the obligation to carry out annual updating processes, provided that other provisions do not define a lower periodicity.

A.7 Document Conservation Policies

The supporting documents of Suspicious or Attempted Transactions must be kept for at least ten (10) years.


To destroy them or send them to the dead file, the express written authorization of the Compliance Officer must be obtained.

A.8 Policy to support all operations, business, and contracts

All activities, businesses, and contracts that RA carries out with its Counterparties must have the corresponding documentary support. RA will tend to include in its contracts clauses that prevent C/TB, declarations on the origin of the funds and faculties for RA that allow it to terminate the relationship at any time in the event of evidence of C/TB practices with indemnification for damages caused by the occurrence of such risks.

Any document that accredits these activities, in addition to constituting the support of the negotiation and the accounting record, serves as evidence for any investigation that may be carried out by the competent authorities.

The Finance area shall verify that the invoice or equivalent document and its attachments support the charge of any account payable. Goods or services received that do not have valid support will not be authorized for payment until the mentioned support is received.

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A.9 Information request from competent authorities' policy

RA will attend, through the Compliance Officer, the submission of information and explanations requested by the competent authorities in C/TB matters.

A.10 TBEP Behavioral Policy

RA's employees will develop their activities in observance of the ethical principles described in the Code of Ethics, which must take precedence over all personal and commercial goals. This shall always seek the best development of the corporate purpose, within a framework of transparency, strict compliance with legal provisions, as well as internal procedures for the prevention and monitoring of C/TB Risks.

It is the duty of RA, its shareholders, the Board of Directors, its Compliance Officer, and other staff members to ensure compliance with the rules aimed at preventing and controlling C/TB Risk, particularly those contained in the legal provisions in force. The above, with the purpose of not only contributing to the realization of the purposes of the State and to comply with the law, but also to protect the image and the national and international reputation of RA.

All Employees shall abide by the following principles applicable to C/TB:


- Know and act in accordance with the provisions herein.
- Report to the Compliance Officer any event or Attempted, Suspicious or Unusual Transaction that leads him/her to believe that there may be an attempt to engage in C/TB activities.
- Prioritize compliance with C/TB prevention regulations over the achievement of business or cost goals for the acquisition of products and services.
- Refrain from disclosing information to Counterparties that have carried out or intend to carry out Suspicious or Attempted Transactions. Likewise, RA shall keep this information and/or documentation confidential.

On the other hand, the Compliance Officer shall provide all the necessary support to the personnel who are faced with a conflict-of-interest situation or risk of participating in a C/TB conduct.

A.11 TBEP Training Policy

RA must design, program and coordinate TBEP training plans, first directed to the entire organization as it is the first time it is implemented. These trainings must be conducted by the Compliance Officer, or the person delegated by him/her for this purpose.

Furthermore, new Employees and third parties (non-employees of the Company or contractors) shall be trained during the onboarding process when appropriate. The same applies to Suppliers, if deemed pertinent. Training programs, in addition to the onboarding training, must be scheduled to be offered

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at least annually and a record must be made of this, indicating the date and the names of the attendees. Finally, after the training has been conducted, the attendees will be evaluated on the knowledge transferred, which will be documented.

A.12 Sanctions Policy

Non-compliance or breach of TBEP's policies and standards constitutes a serious misconduct. Consequently, and in appropriate cases, the provisions of the Code of Ethics will be applied, as well as the procedures and sanctions established by the Internal Work Regulations.

In the training and disclosure sessions, the sanctions that will result from not complying with the System Policies and related rules will be made known.

It is the responsibility of RA to verify that employees fully comply with the instructions given and that any information related to the C/TB is immediately brought to the attention of the Compliance Officer.

A.13 Political Campaign Contribution Policy

Contributions to political campaigns of any nature by RA are prohibited.

A.14 Donation Policy

As an integral part of the PTEE, prior to donating or receiving a donation, the Due Diligence process to be established below must be followed, to prevent and mitigate any risk of C/TB that may arise from the process.


The due diligence process is composed of tools, such as the approval of different areas of the company, the full identification of the product to be donated, the applicant, the recipient of the donation, the value of the donation, among other elements. The following is a step-by-step description of the Due Diligence process:

1. Completion of the Product Donation Form:

The person in charge of processing the donation must fill out the Product Donation Form, through which the usefulness and purpose of the donation to be made is determined, characterizing and detailing all aspects related to it. This form can be found in Annex E of this Manual.

2. Request for approval:

The person in charge of processing the donation, must submit the form to the Business Unit Director, of the Business Unit Vice President and the Business Unit CFO of the Company, to obtain their prior

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approval. This, intends to ensure that the donation and its details are known by the senior officers, as well as all transactions involving an increase or decrease in the Company's assets, as well as of all business and operations in which it is involved.

Contents of the application

- Identification of the person requesting approval for the donation
- Date of application
- Country
- City
- Contact Person
- Address
- Telephone
- Catalog number / item / name of service required
- Product description
- Price reflected in catalog
- Selling price and
- Total value

Identification of the need for which the donation is being made.


It is necessary to identify and know the details of the following points by filling out the form:

- The intended use of the donated products.
- The reason why the entity has been selected for the donation.
- How the donation will benefit the company, and how the benefits of the donation will be calculated.
- What is the institution's plan for installing, using, and maintaining the product.
- What the plan is to ensure that the product is installed correctly and how this plan will be properly maintained by the applicant.
- The names of the local Rockwell employees who are or will be involved in the donation and their role in the process.
- Identification of the knowledge of the relevant area managers, sales engineers, and regional or district sales managers of the request.
- The source of the goods, funds, or services from which the donation comes.

3. Approval:

The Vice President Community Impact, the Director of Corporate Finance and Corporate FP&A, must give approval or disapproval, to continue with the process and make the donation.

Following each of the steps, it is intended to obtain a deep knowledge of the donation, which allows to identify warning signs or potential Risk Events.

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A.15 Cash Management Policy

RA will not carry out cash transactions, except for petty cash payments, which are limited to USD\$300 calculated at the Representative Market Rate of the day of payment.

All payments must be made through Financial Entities in which RA has authorized bank accounts. Likewise, cash payments will not be received apart from the exceptions defined according to the nature of the operation, which must be approved by the hierarchical superior and the Compliance Officer.

The Treasury area must carry out monthly verifications of the payments made by Clients, with the objective of identifying and monitoring those who make frequent cash payments greater than half a SMMLV. If any unusual or suspicious movement is identified, the Employee must report it to the Compliance Officer and the latter to the authorities.

RA will not make payments to third parties with whom a contract has not been entered into or a purchase order issued for; as well as those that have not undergone the Procedure for Identification, Measurement and Treatment of Risks.

B. RA Global Policies

RA has a series of global policies that cover all its Employees and extend to third parties with whom they interact. Some of them have provisions that may complement the processes carried out under the TBEP, so they are relevant and must be adopted by the Company's employees.


B.1 Global Anti-Corruption Policy

Its objective is to prevent acts of corruption in any of the companies of the corporate group controlled by the Parent Company around the world, in consideration of the high impact that these acts have on the reputation of the Company, by establishing control mechanisms and sanctions for violations to the policy.

The complete policy can be found on RA's web site at the following address:
<https://rockwellautomation.sharepoint.com/:b:/s/SISTEMAINTEGRADODEGESTIN/EfZn0ZDukTdMtGoWiMMfvWEBZiGQirCPLXnwzqnWAmJxHg?e=bjvS8N>.

However, its most important features in relation to the TBEP are highlighted, as follows:

- It must be observed by all RA Employees, distributors, and sales representatives, as well as by Suppliers.
- Employees responsible for relations with Suppliers are obliged to establish a screening process to determine if they do business in an ethical manner, as well as to understand and apply this policy.

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- A risk-based approach is determined according to the characteristics of the third party, with a Due Diligence process, prior to initiating a business relationship.
- Disciplinary consequences and dismissal for non-compliance are established.
- It is forbidden to receive or give gifts and hospitality of more than USD\$100, with prior approval of the hierarchical superior.
- It is prohibited to give gifts or cash to public officials.
- The Employee in charge must ensure that the Supplier accepts the Supplier Code of Ethics.
- Contracts signed with Suppliers must have anti-corruption clauses.
- Sales intermediaries (distributors, sales agents, and sales consultants) must comply with the Market Access Procedure mentioned below.
- The purchasing area must invite an RA lawyer to participate before signing a letter of intent with the Supplier. The lawyer must do a Due Diligence process and analyze the risk together with the Employee.


B.2 Market Access Procedure

Its objective is to dictate the guidelines to ensure that the provisions of RA's Global Anti-Corruption Policy are enforced in the contracting processes of agents, distributors, sales representatives and, in general, all intermediaries used by RA to access the domestic market.

The complete Procedure can be found on the RA website at <https://rockwellautomation.sharepoint.com/sites/OGC/Compliance/SitePages/Welcome.as> and/or https://www.rockwellautomation.com/en_NA/about-us/overview.page?pagetitle=Ethics-and-Compliance&docid=1f0a48bdf3e14c4e23dcd06d8670319.

However, its most important characteristics in relation to the TBEP are highlighted, being:


- It must be observed by the legal, marketing, technology, human resources, engineering, and finance areas (hereinafter, the "Function"):
- It must be observed by the legal, marketing, technology, human resources, engineering, and finance areas (hereinafter, the "Function"), as well as by sales and marketing teams composed of intermediaries, sales agents, or distributors (hereinafter, "GSM").
- Whenever acting through GSM, Due Diligence, training processes, pre-employment approval and documentation of this Procedure must be ensured. Compliance by Employees will be the responsibility of the Channel Manager with the support of an internal RA lawyer.

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- The pre-approval must be submitted by the Channel Manager to his/her superior and must contain at least: (i) support of the Due Diligence process carried out and (ii) summary of the geography and (iii) the products that would be covered by the relationship with the third-party intermediary.
- Due Diligence Process:
 - Due Diligence: implies that the level of closeness of the intermediary with RA and the corruption index of the country where it operates are analyzed. It should be performed every year or before establishing new business relationships.
- Levels of the Due Diligence process:
 - Level 1: executed autonomously by the Employee.
 - Level 2: performed by the Employee with the participation of the intermediary who must clarify and provide further information.
 - Level 3: performed by the Employee with the participation of a private investigator who certifies the veracity of the information.
- Prior to the execution of the contract, the Channel Manager must visit the third party's facilities in person.
- Every 2 years an anti-corruption training session must be held, and an anti-corruption commitment must be signed.
- The legal area keeps a file of original contracts, due diligence forms, periodic evaluations, training records and written commitments, which are kept for 10 years.
- There is a special and more rigorous Due Diligence procedure that must be observed with intermediaries in charge of processing and obtaining permits from public entities or State agents, which dictates that:
 - A database search must be performed exclusively by the Legal area.
 - The Channel Manager must, in addition to the visit to the facilities of the third party, engage in a discussion on business ethics with the Supplier.
 - A written commitment to comply with RA policies must be obtained.

B.3 RA's Code of Conduct

It is intended to compel all RA Employees to meet their goals by conducting business in accordance with all applicable laws and the highest standards of corporate ethics.

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The complete Code can be found on RA's website at the address <https://rockwellautomation.sharepoint.com/:b:/r/sites/SISTEMAINTEGRADODEGESTIN/Share%20Documents/Manuales%20y%20Reglamentos/C%C3%B3digo%20de%20Conducta/Code%20of%20Conduct%20-%20Spanish.pdf?csf=1&web=1&e=zAIW9O>

However, its most important features in relation to the TBEP are highlighted, namely:

- Training on the Code must be provided to new Employees upon joining and on an annual basis to former Employees.
- RA has its own body called the Board of Directors in charge of enforcing the Code and making decisions regarding its breach.
- If an Employee becomes aware of any conduct in violation of the Code, he/she must notify his/her superior, the Human Resources area, the Legal area, or through the Ombudsman's channel.


B.4 Suppliers Code of Conduct

Its objective is to extend the obligations of conduct of RA and its Employees, to the Suppliers so that they act ethically following these guidelines with their supply chain.

The complete Code can be found on the RA website at <https://rockwellautomation.sharepoint.com/sites/OGC/Compliance/SitePages/Welcome.as> and/or https://www.rockwellautomation.com/en_NA/about-us/overview.page?pagetitle=Ethics-and-Compliance&docid=1f0a48bdf3e14c4e23dcd06d8670319.

However, its most important features in relation to the TBEP are highlighted, namely:

- The Supplier must agree in writing that they will observe this Code of Conduct and the Company's Code of Conduct.
- In addition to extending the obligations of the general Code of Conduct, it establishes the obligation to comply with the U.S. standard identified as "Customs trade partnership against terrorism (C-TPAT)"

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**ANNEX C – DOCUMENTATION FORM FOR THE IDENTIFICATION,
MEASUREMENT, AND MANAGEMENT OF CORRUPTION AND TRANSNATIONAL
BRIBERY RISKS FOR THEIR MITIGATION**

Date: _____
 Reporting party's name: _____
 Position: _____
 Department: _____
 Senior Management: _____

1. Description of the Risk Event:

2. Decision on the Risk Event:


- Not to continue with the situation or activity that gives rise to the Risk Event: _____
- To continue with the situation or activity that gives rise to the Risk Event by applying a Treatment Plan: _____

3. Motivation to continue with the situation or activity that generates the Risk Event (only to be filled in if it has been decided to continue with the activity that gives rise to the Risk Event):

4. Treatment Plan

a. Objective of Treatment Plan (Mark with an X):

- Risk avoidance: _____
- To reduce the probability of occurrence/consequences of risks: _____
- To transfer risks (e.g., contractual stipulations or insurance): _____

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b. Description of the Treatment Plan (definition and characteristics of the treatment):

c. Treatment priority (Mark with an X):

- High _____
- Medium _____
- Low _____

d. Responsible for the implementation: _____

e. Responsible for Plan Monitoring (Immediate Manager):

f. Required resources (Human, Technological, Contractual, etc.):

g. Monitoring Periodicity:


- Monthly ☐
- Every Two months ☐
- Every three months ☐
- Every six months ☐
- Annual ☐
- Other: _____


Reporting Party:

Compliance Officer:

Name: _____
 Position: _____
 ID: _____

Name: _____
 ID: _____

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ANNEX D – FORM FOR REPORTING UNUSUAL, ATTEMPT OR SUSPICIOUS OPERATIONS

Risk Event Report

Please report if in the month of (-) of 202(-) you witnessed or know of any event related to Money Laundering, Financing of Terrorism, Financing of the Proliferation of Weapons of Mass Destruction, Corruption or Transnational Bribery.

If you wish to report a risk event, please answer the questions below:

1. Choose the situation you wish to report:

- ☐ Unusual Operation
- ☐ Attempted operation
- ☐ Suspicious Operation

2. Type of Risk

- ☐ Money Laundering
- ☐ Financing of Terrorism
- ☐ Financing of the Proliferation of Weapons of Mass Destruction
- ☐ Transnational Bribery


3. Date on which you believe the risk event occurred/will occur


4. Name and position of the people involved

5. Describe the facts you consider relevant

6. Describe the evidence you consider relevant

7. Please attach the evidence you have of those described in the previous question.
(Attach)

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ANNEX E – PRODUCT DONATION FORM
ROCKWELL AUTOMATION
REQUEST FOR CONTRIBUTIONS OF ROCKWELL AUTOMATION ASSETS

INSTRUCTIONS

- To ensure you are submitting the most recent form be sure to visit the Global Community Relations sharepoint site on A-Z.
- The requestor is responsible for executing the donation.
- Shipping costs and any remaining cost of the products need to be charged to the Business Unit. Requestor is also responsible for coordinating product shipment and activities with the following departments as applicable: Finance/Accounting, U.S. and Receiving Location Order Services Group; International Transportation/Shipping; Export/Import Compliance.
- Sales group, while not needing formal approval, must be notified by requestor by copy of this form.
- Ensure list price is in US Dollar amounts, subject to change if not applicable per local regulations.
- Preferred Institutions are Rockwell Automation Key University partners or FIRST Choice via FIRST HQ.
- Complete form with requested signatures.

SECTION 1: BUSINESS - REQUESTER INFORMATION

Requesting Employee:	Date:
<input type="text"/>	<input type="text"/>
Requesting Group / Region:	Business Finance Representative:
<input type="text"/>	<input type="text"/>


SECTION 2: APPROVALS

Required for all donations, must be obtained by requestor prior to submitting request

Business Unit Manager:	Date:
<input type="text"/>	<input type="text"/>
Business Unit VP:	Date:
<input type="text"/>	<input type="text"/>
Business Unit Finance Director:	Date:
<input type="text"/>	<input type="text"/>

SECTION 3: DONATION INFORMATION

Organization Name (Donee):	Street Address:
<input type="text"/>	<input type="text"/>

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City, State, Zip:

Country:

--	--

Contact Name:

Title:

Phone & Fax:

--	--	--

List all requested Rockwell Automation products. Attach an excel spreadsheet (using the format below).

Catalog # or Item # or Name of Service Provider	Description	List Price	Cost Price (before any reserve)
	TOTAL:		

SECTION 4: BUSINESS CASE RATIONALE

Describe the intended use of the donated SOEO product(s) and why this Institution was selected for this donation:

--

How would this donation benefit the Institution? How will these benefits be measured (realized):

--

What is the Institution's plan for installing, using and maintaining this product?

--


What is the plan to ensure the product is installed correctly? That it will be used by the requestor (vs. sitting on a shelf) and maintained properly? List local Rockwell Automation employee names who are or will be involved with the donation and what their involvement entails.

--

Have the appropriate Area Managers, Sales Engineers, and District/Regional Sales Managers been made aware of this request?

--

SECTION 5: Submit request

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- Requestor must send this completed form with approval signatures and Bill of Materials in an excel spreadsheet.


----- **GCRC and RA Finance ONLY** -----

Vice President-Community Impact:	Date:	
Corporate Finance Manager:	Date:	
Corporate FP&A:	Date:	Reference # Assigned:

If applicable:

Quality-failed product verification:	Date:
Global Academic Enablement	Date:

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ANNEX F - SYSTEM SELF-ASSESSMENT FORM

Name: _____

Position: _____

Department: _____

1. I know the existence of the Transparency and Business Ethics Program ("TBEP") and the Self-Control System for Integral Risk Management of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction ("SAGRILAF"):

Yes____ No____

2. I consider that the trainings that were conducted regarding the TBEP and SAGRILAF were (mark with an X):

Excellent: _____ Good: _____ Acceptable: _____ Poor: _____

3. I believe that the TBEP has been effectively disclosed within the Company (mark with an X):

Excellent: _____ Good: _____ Acceptable: _____ Poor: _____

4. I consider that my performance in fulfilling the duties required of me by the TBEP was (mark with an X):

Excellent: _____ Good: _____ Acceptable: _____ Poor: _____

5. I know the reporting channels for risk events regarding to SAGRILAF and PTEE (Physical Mailbox, Online Risk Event Report, Ombudsman reporting channel, Compliance Officer e-mail)

Yes____ No____


6. Have I submitted risk reports to the Compliance Officer?

Yes____ No____


7. I consider that the reporting channels available are:

Excellent: _____ Good: _____ Acceptable: _____ Poor: _____

Employee Signature

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Name:
ID:

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ANNEX G – SINGLE EMPLOYEE DECLARATION FORM – FO-HR-011

I hereby declare to ROCKWELL AUTOMATION COLOMBIA S.A.:

That I know, have read, and understand its Transparency and Business Ethics Program ("TBEP") and its Self-Control System for Integral Risk Management of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction ("SAGRILIFT") and I expressly undertake to comply with them and submit to the provisions therein.

That I have been trained with respect to the TBEP and SAGRILIFT and that I understand their scope, as well as my obligations.

That I am not related to any activity of Corruption, Transnational Bribery ("C/TB"), Money Laundering, Financing of Terrorism or Financing of the Proliferation of Weapons of Mass Destruction ("ML/FT/FPWMD"), nor am I under investigation or with a judicial sentence against me for the exercise of illicit activities, as well as my relatives up to the third degree.

That the origin of my funds and assets are lawful and do not come in any way from C/TB or ML/FT/FPWMD activities.

Employee's signature:


Name:

ID:

Date: ____ / ____ / ____

Position: _____

Department: _____

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ANNEX H – TBEP ANNUAL TRAINING CERTIFICATION ACT

Bogota D.C., [--] [--], 20[--]

Rockwell Automation Colombia S.A.
City

Re: Minutes of attendance to the annual TBEP training for 202[-].

[--] identified with CC [--], as Human Resources Business Partner of Rockwell Automation Colombia S.A., identified with NIT 830.018.146-7; I hereby certify the attendance of the company's employees to the annual TBEP training held on [--] of [--] 202[--], and which was attended by the employees, as certified in annex one (01) of this document.

During the training, the following matters related to the **TBEP** were presented:


- Definition.
- Legal framework.
- Background.
- Structure.
- Diagnosis.
- Relevant agents.
- Compliance Officer.
- Types of C/TB Risk.
- Risk identification, measurement, and treatment.
- Obligations.


Additionally, employees were given the coordinates to identify the **TBEP** manual, and the points of contact in case of doubts or concerns.

Sincerely,


[--]
Human Resources Business Partner
Rockwell Automation Colombia S.A.


Attachment:
- Minutes with list of attendees

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ANNEX I - SINGLE COUNTERPARTY DECLARATION FORM

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	SISTEMA INTEGRADO DE GESTIÓN	FO-SIG-013
	FORMULARIO ÚNICO DE DECLARACIÓN DE CONTRAPARTES / SINGLE COUNTERPARTY STATEMENT FORM	VERSIÓN: 3
		FECHA / DATE: 04/01/2024

FORMULARIO ÚNICO DE DECLARACIÓN DE CONTRAPARTES / SINGLE COUNTERPARTY STATEMENT FORM

Para mayor información del alcance de los sistemas SAGRILIFT y PTEE de Rockwell Automation Colombia S.A. lo invitamos a ver el siguiente [Video o](#) [Manuales/](#)
For more information of Rockwell Automation Colombia S.A'S SAGRILIFT and PTEE systems, we invite you to see the following [Video or](#) [Manuals](#)

I. INFORMACIÓN GENERAL DE LA CONTRAPARTE/ COUNTERPARTY GENERAL INFORMATION

Nombre o razón social / Company name	Tipo de identificación / ID type	Número de identificación / ID number

II. DECLARACIÓN DE CUMPLIMIENTO / COMPLIANCE STATEMENTS

Origen de los recursos y bienes de la compañía / Origin of the company's resources and assets

--

Marque con una "x" si la compañía realiza alguna de las siguientes actividades /
Mark with an "X" if the company performs one of the following activities:

Corporación, fundación o entidad sin ánimo de lucro/ Corporation, foundation or non-profit entity	<input type="checkbox"/>	Constructoras / Construction companies	<input type="checkbox"/>
Profesionales y casas de cambio / Professionals and exchange houses	<input type="checkbox"/>	Notarios / Notaries	<input type="checkbox"/>
Casas de empeño / Pawnshops	<input type="checkbox"/>	Estaciones de gasolina / Gasoline stations	<input type="checkbox"/>
Casinos y negocios de apuestas / Casinos and gambling businesses	<input type="checkbox"/>	Empresas ubicadas en zonas francas/ Companies located in free trade zones	<input type="checkbox"/>
Comercializar armas, explosivos o municiones / Commercialization of arms, explosives or ammunition	<input type="checkbox"/>	Empresas del sector salud / Health sector	<input type="checkbox"/>
Entidades deportivas / Sports entities	<input type="checkbox"/>	Empresas dedicadas al fútbol y otros deportes / Companies dedicated to soccer and other sports	<input type="checkbox"/>
Prestamistas / Lenders	<input type="checkbox"/>	Empresas de seguridad / Security companies	<input type="checkbox"/>
Actividad en el sector transportador / Activities in the transport sector	<input type="checkbox"/>	Operadores postales / Postal operators	<input type="checkbox"/>
Transportadores de dinero o de valores / Money or value transporters	<input type="checkbox"/>	Comercializadoras o agencias de bienes raíces / Real estate agencies or traders	<input type="checkbox"/>
Operadores cambiarios fronterizos / Border exchange operators	<input type="checkbox"/>	Empresas dedicadas a la transferencia o envío de fondos o remesas / Companies engaged in the transfer or remittance of funds or remittances	<input type="checkbox"/>
Prestar servicios de contaduría y revisoría fiscal / Providing accounting and auditing services	<input type="checkbox"/>	Comercializadoras/arrendadoras de vehículos automotores, embarcaciones y aeronaves / Motor vehicles, boats and aircrafts traders/lessors	<input type="checkbox"/>
Prestar servicios como abogados / Providing services as attorneys at law	<input type="checkbox"/>	Comercializadoras/arrendadoras de vehículos automotores, embarcaciones y aeronaves / Commercialization/leasing of motor vehicles, boats and aircrafts	<input type="checkbox"/>
Actividad dedicada a la minería / Activity dedicated to mining	<input type="checkbox"/>	Comercializar antigüedades, joyas, metales y piedras preciosas, monedas, objetos de arte y sellos postales / Trading in antiques, jewelry, precious metals and stones, coins, art objects and postage stamps	<input type="checkbox"/>
Hoteles y agencias de viaje / Hotels and travel agencies	<input type="checkbox"/>	Comercializar productos controlados por la Dirección Nacional de Estupefacientes / Commercialization of products controlled by the National Narcotics Directorate	<input type="checkbox"/>

Relacione los países en los que la compañía ejecuta actividades / Indicate the countries where the company execute operations:

--

La compañía tiene operación o realiza negocios con entidades ubicadas en alguna de las siguientes jurisdicciones

Albania, Barbados, Burkina Faso, Islas Caimán, República Democrática del Congo, Gibraltar, Haití, Jamaica, Jordán, Malí, Mozambique, Nigeria, Panamá, Filipinas, Senegal, Sudáfrica, Sudán del Sur, Siria, Tanzania, Turquía, Uganda, Emiratos Árabes Unidos, Yemen /

The company has operations or conducts business with entities located in any of the following jurisdictions:


Albania, Barbados, Burkina Faso, Cayman Islands, Democratic Republic of Congo, Gibraltar, Haiti, Jamaica, Jordan, Mali, Mozambique, Nigeria, Panama, Philippines, Senegal, South Africa, South Sudan, Syria, Tanzania, Turkey, Uganda, United Arab Emirates, Yemen.

Sí / Yes No / Not

<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------

Si marcó "Sí" en la pregunta anterior, especifique de qué manera realiza negocios en estas jurisdicciones /
If you marked "YES" in the previous question, please specify how the company conduct business in these jurisdictions:

--

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III. DECLARACIÓN DE BENEFICIARIOS FINALES Y PERSONAS EXPUESTAS POLÍTICAMENTE /
BENEFICIAL OWNERS AND POLITICALLY EXPOSED PEOPLE DECLARATION

Elija alguna de las siguientes opciones según se adecúe a la realidad de su compañía, y declare como beneficiarios finales a la(s) persona(s) natural(es) que:

- Sean titulares directa o indirectamente del 5% o más del capital social de la compañía, o se beneficien del 5% o más de los activos, rendimientos o utilidades de la compañía, o
- Ejerzan control sobre la persona jurídica por cualquier medio, o
- Si la compañía es una Entidad Sin Ánimo de Lucro, o cotice sus acciones en la bolsa de valores, se debe declarar la persona natural que ostente el cargo de representante legal, o
- Si la compañía es una estructura sin Personería Jurídica, declare como beneficiario(s) final(es), según corresponda, a la(s) siguiente(s) persona(s): Fiduciante(s), fideicomitente(s), constituyente(s) o posición equivalente, Fiduciario(s) o posición equivalente, Comité fiduciario, comité financiero o posición equivalente; Fideicomisario(s), beneficiario(s) o beneficiario(s) condicionado(s); cualquier otra persona natural que ejerza el control efectivo y/o final, o que tenga derecho a gozar y/o disponer de los activos, beneficios, resultados o utilidades.

Choose one of the following options as appropriate to the reality of your company, and declare as beneficial owners the natural person(s) who:

- Directly or indirectly hold 5% or more of the company's capital stock, or benefit from 5% or more of the company's assets, yields or profits, or 2.
- Exercise control over the legal person by any means, or
- If the company is a Non-Profit Entity, or its shares are listed on the stock exchange, the natural person holding the position of legal representative must be declared, or
- If the company is an unincorporated structure, declare as beneficial owner(s), as applicable, the following person(s): Trustor(s), settlor(s), constituent(s) or equivalent position; Trustee(s) or equivalent position; Trust committee, financial committee or equivalent position; Trustee(s), beneficiary(ies) or conditional beneficiary(ies); any other natural person exercising effective and/or ultimate control, or entitled to enjoy and/or dispose of the assets, benefits, results or profits.

Nombre / Name	Tipo y número de documento de identidad / ID type and number	Fecha de expedición documento / Date of issuance	Porcentaje de participación / Percentage of participation	Cargo y razón de control / Position and reason for control

Los representantes legales, miembros de Junta Directiva, Revisores Fiscales o Beneficiarios Finales, son Personas Expuesta Políticamente ("PEP") /
Legal representatives, members of the Board of Directors, Statutory Auditors or Beneficial Owners, are a Politically Exposed Person ("PEP").
(Decreto 830 de 2021)

Si / Yes ☐ No / Not ☐ ¿Quién? / Who?

IV. PROGRAMAS DE CUMPLIMIENTO / COMPLIANCE SYSTEMS

Responda las siguientes preguntas SÓLO si la compañía está obligada por la ley, a contar con un Sistema de Autocontrol y Gestión del Riesgo Integral del Lavado de Activos y Financiamiento del Terrorismo ("SAGRILAFT"), o un Programa de Transparencia y Ética Empresarial ("PTEE")

Tenga en cuenta las siguientes definiciones:

LA/FT/FPADM: Lavado de Activos / Financiamiento del Terrorismo / Financiamiento de la Proliferación de Armas de Destrucción Masiva
C/ST: Corrupción / Soborno Transnacional /

Answer the following questions ONLY if the company is required by law, to have a Self-Control and Integral Risk Management System for Money Laundering and Terrorism Financing ("SAGRILAFT"), or a Transparency and Business Ethics Program ("PTEE").

Please note the following definitions:

LA/FT/FPADM: Money Laundering / Financing of Terrorism / Financing the Proliferation of Weapons of Mass Destruction.

C/ST: Corruption / Transnational Bribery.

	SÍ / YES	NO / NOT
La compañía está obligada a contar con un SAGRILAFT / The company is required to have a SAGRILAFT		
La compañía está obligada a contar con un PTEE / The company is required to have a PTEE		
La compañía cumple con las normas colombianas relacionadas con la prevención de LA/FT/FPADM y C/ST / The company complies with Colombian regulations related to AML/CFT/FPADM and C/ST prevention.		
La compañía cuenta con manuales y procedimientos de prevención, control y administración del riesgo de LA/FT/FPADM y C/ST, ajustados a las regulaciones vigentes / The company has manuals and procedures for the prevention, control and management of ML/FT/FT/ATF and C/ST risks, in accordance with current regulations.		

V. DECLARACIONES / STATEMENTS

Con la firma del presente documento, declaro que /
By signing this document, I hereby declare that:


Conozco y entiendo el SAGRILAFT y el PTEE de ROCKWELL AUTOMATION COLOMBIA S.A., y me comprometo expresamente a cumplirlos /
I know and understand the SAGRILAFT and the PTEE of ROCKWELL AUTOMATION COLOMBIA S.A., and I expressly agree to comply with them.


Los recursos de la compañía no involucran actividades ilícitas previstas en el Código Penal Colombiano o cualquier norma que lo complemente o modifique /
The company's resources do not involve illicit activities foreseen in the Colombian Criminal Code or any regulation that complements or modifies it

Los bienes y servicios que comercializa la compañía han sido debidamente nacionalizados, no son de contrabando o de venta restringida, y cuentan con las licencias y autorizaciones pertinentes para su comercialización /
The goods and services marketed by the company have been duly nationalized, are not contraband or of restricted sale, and have the pertinent licenses and authorizations for their commercialization.

La información aquí suministrada corresponde a la realidad y autorizo su verificación ante cualquier persona pública o privada, desde ahora y mientras subsista alguna relación contractual con ROCKWELL AUTOMATION COLOMBIA S.A., o con quien represente sus derechos, conforme a lo previsto en la Ley de Habeas Data. /
The information provided herein corresponds to reality and I authorize its verification before any public or private person, from now on and as long as any contractual relationship with ROCKWELL AUTOMATION COLOMBIA S.A. subsists, or with whoever represents its rights, according to the provisions of the Habeas Data Law.

Autorizo a ROCKWELL AUTOMATION COLOMBIA S.A. a reportar a las autoridades nacionales o de cualquiera de los países en los cuales esta realice operaciones, sobre las situaciones en este documento descritas, así como a suministrar a las autoridades competentes, toda la información personal, pública, privada o semiprivada, que considere procedente, exonerándola de toda responsabilidad por tal reporte /
I authorize ROCKWELL AUTOMATION COLOMBIA S.A. to report to the national authorities or those of any of the countries in which it operates, about the situations described in this document, as well as to provide the competent authorities with all the personal, public, private or semi-private information it deems appropriate, exempting it from any responsibility for such report.

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ROCKWELL AUTOMATION COLOMBIA S.A. está en la obligación legal de solicitar las aclaraciones que estime pertinentes en el evento en que se presenten circunstancias en las que pueda tener dudas sobre mis operaciones o las de la compañía, evento en el cual suministraremos las aclaraciones que sean del caso. Si estas no son satisfactorias, ROCKWELL AUTOMATION COLOMBIA S.A., podrá dar por terminada cualquier relación comercial. / ROCKWELL AUTOMATION COLOMBIA S.A. is legally obliged to request the clarifications it deems pertinent in the event that circumstances arise in which it may have doubts about my operations or those of the company, in which case we will provide the necessary clarifications. If these are not satisfactory, ROCKWELL AUTOMATION COLOMBIA S.A. may terminate any commercial relationship.
La compañía ha sido debidamente constituida bajo el régimen jurídico del país de domicilio, y todas las licencias y documentos se encuentran al día y en orden / The company has been duly incorporated under the legal regime of the country of domicile, and all licenses and documents are current and in order.
Los empleados y contratistas de la compañía, han sido informados sobre el contenido del PTEE y el SAGRILIFT, y se encuentran debidamente capacitados / The company's employees and contractors have been informed about the contents of the PTEE and SAGRILIFT, and are duly trained.
Los colaboradores de la compañía asignados a la ejecución de contratos con ROCKWELL AUTOMATION COLOMBIA S.A., no presentan antecedentes de investigaciones o condenas por delitos relacionados con LA/FT/FPADM y C/ST / The company's employees assigned to the execution of contracts with ROCKWELL AUTOMATION COLOMBIA S.A., do not have a history of investigations or convictions for crimes related to ML/FT/FPADM and C/ST.
La compañía no ha estado involucrada en investigaciones por violación a las leyes relacionadas con C/ST o LA/FT/FPADM. / The company has not been involved in investigations for violation of laws related to C/ST or LA/FT/FPADM.
La compañía, empleados, directivos, accionistas, asociados o socios que directa o indirectamente tengan el cinco por ciento (5%) o más del capital social, no tienen investigaciones, procesos o condenas por delitos relacionados con LA/FT/FPADM o C/ST. / The company, employees, officers, directors, shareholders, associates or partners who directly or indirectly hold five percent (5%) or more of the capital stock, have no investigations, proceedings or convictions for offenses related to ML/FT/AML/CFT or C/ST.
Mantendré indemne y eximo a ROCKWELL AUTOMATION COLOMBIA S.A. de toda responsabilidad que se derive de información errónea, falsa o inexacta que hubiere proporcionado en este documento / I will hold harmless and exempt ROCKWELL AUTOMATION COLOMBIA S.A. from any liability arising from erroneous, false or inaccurate information provided in this document.

VI. Autorización para el tratamiento de datos personales / Authorization for the processing of personal data

Autorizo a ROCKWELL AUTOMATION COLOMBIA S.A. para almacenar, utilizar, transmitir o transferir los datos personales por mí suministrados. Así mismo, declaro que:

-Dentro de los datos personales por mí suministrados, pueden existir datos personales de terceros vinculados con la Compañía, respecto de los cuales, cuento con la autorización necesaria para su tratamiento, transmisión o transferencia.

-Los datos entregados serán utilizados por ROCKWELL AUTOMATION COLOMBIA S.A. para realizar las verificaciones de debida diligencia y cumplimiento de requerimientos por autoridades.

-Se me ha informado que tengo derecho a solicitar prueba de esta autorización, ser informado sobre su uso, revocarla, conocer, actualizar, rectificar y/o suprimir los datos personales, salvo que exista un deber legal o contractual imperativo de conservar la información.

-Cualquier petición, consulta, actualización o reclamo respecto de los datos personales suministrados podrá ser remitida al correo electrónico privacy@ra.rockwell.com.

-El manejo de mis datos personales se hará conforme a la [Política de Tratamiento de Datos Personales de ROCKWELL AUTOMATION COLOMBIA S.A.](#), la cual podrá ser validada en cualquier momento /

I authorize ROCKWELL AUTOMATION COLOMBIA S.A. to store, use, transmit or transfer the personal data provided by me. Likewise, I declare that:

-Within the personal data provided by me, there may be personal data of third parties related to the Company, with respect to which, I have the necessary authorization for their treatment, transmission or transfer.


-The data provided will be used by ROCKWELL AUTOMATION COLOMBIA S.A. to carry out due diligence verifications and compliance with requirements by authorities.

-I have been informed that I have the right to request proof of this authorization, be informed about its use, revoke it, know, update, rectify and/or delete the personal data, unless there is an imperative legal or contractual duty to keep the information.

-Any request, consultation, update or claim regarding the personal data provided may be sent to the e-mail privacy@ra.rockwell.com.

-The handling of my personal data will be done according to the [Personal Data Treatment Policy of ROCKWELL AUTOMATION COLOMBIA S.A.](#), which may be validated at any time.

Nombre / Name	Tipo de identificación / ID Type	Número de identificación / ID number
<div></div>	<div></div>	<div></div>
Cargo / Position	Fecha / Date	Firma / Signature
<div></div>	<div></div>	<div></div>

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ANNEX J – STATEMENT OF CANDIDATES

I hereby authorize **ROCKWELL AUTOMATION COLOMBIA S.A.** to store, use, transmit or transfer the personal data provided by me. Likewise, I declare that:

- The data provided will be used by **ROCKWELL AUTOMATION COLOMBIA S.A.** to carry out due diligence verifications and fulfillment of requirements by authorities to continue with the process of engagement with the organization.
- I have been informed that I have the right to request proof of this authorization, be informed about its use, revoke it, know, update, rectify and/or delete the personal data, unless there is an imperative legal or contractual duty to keep the information.
- Any request, consultation, update or claim regarding the personal data provided may be sent to the e-mail privacy@ra.rockwell.com.
- The management of my personal data will be done according to the Personal Data Treatment Policy of **ROCKWELL AUTOMATION COLOMBIA S.A.**, which may be validated at any time at the link: <https://www.rockwellautomation.com/es-co/company/about-us/legal-notices/privacy-and-cookiespolicy.html>.

I indemnify and hold **ROCKWELL AUTOMATION COLOMBIA S.A.** exempt from any liability arising from erroneous, false, or inaccurate information provided by me.

I declare that YES ___ NO ___ I am a Publicly Exposed Person ("PEP"), understood as any public official who has the following functions:

- Issuance of rules or regulations.
- General management.
- Formulation of institutional policies and adoption of plans, programs and projects, direct management of goods, money, or securities of the State.
- Administration of justice or administrative sanctioning powers.


Individuals in charge of the direction or management of resources in political movements or parties shall also be PEPs.

Candidate Signature: _____


Name: _____

Citizenship Card No.: _____

Residence: _____

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Date: _____

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**ANNEX K - DOCUMENTATION FORM FOR THE IDENTIFICATION,
MEASUREMENT, AND TREATMENT OF ML/FT/FPWMD RISKS FOR THEIR
MITIGATION**

Date: _____
 Reporting Party's name: _____
 Position: _____
 Department: _____
 Hierarchical Superior: _____

1. Description of the Risk Event:

2. Result of the Inherent Risk calculation (mark with an X):


Moderate Inherent Risk: _____
 Low Inherent Risk: _____
 High Inherent Risk: _____
 Extreme Inherent Risk: _____
 Inherent Intolerable Risk: _____

3. Result of the Residual Risk calculation (mark with an X):

Moderate Residual Risk: _____
 Low Residual Risk: _____
 High Residual Risk: _____
 Extreme Residual Risk: _____
 Intolerable Residual Risk: _____

4. Decision regarding the Risk Event:

Do not continue with the situation or activity that gives rise to the Risk Event: _____
 Continue with the situation or activity that gives rise to the Risk Event by applying a Treatment Plan:

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5. Justification for continuing with the situation or activity that generates the Risk Event (in case it has been decided to continue with the activity that gives rise to the Risk Event):

6. Treatment Plan

- a. Objective of the Treatment Plan (mark with an X):

- Avoid risk: _____
- Reduce the probability of occurrence/consequences of the risks: _____
- Transfer risks (e.g., contractual provisions or insurance): _____

- b. Description of the Treatment Plan (definition and characteristics of the treatment):

- c. Treatment Priority (Mark with an X):


- High (Intolerable or Extreme Residual Risk): _____
- Moderate (High Residual Risk): _____
- Low (Low or Moderate Residual Risk): _____

- d. Responsible party for implementation:

- e. Responsible party for Monitoring the Plan (Immediate Manager):

- f. Required resources (Human, Technological, Contractual, etc.):

- g. Follow-up Frequency:

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- Monthly
- Bimonthly
- Quarterly
- Biannual
- Annual
- Other: _____

Reporting Party's Signature:

Compliance Officer's Signature:

 Name:
 Position:
 Identification card No.:

 Name:
 Position:
 Identification card No.: