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|  | INTEGRATED MANAGEMENT SYSTEM | | |
| | SELF-MONITORING INTEGRATED RISK MANAGEMENT SYSTEM FOR MONEY LAUNDERING, FINANCING OF TERRORISM, AND FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION MANUAL (“SAGRILAFT”) OF ROCKWELL AUTOMATION COLOMBIA S.A. | | |
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I. PREAMBLE

The Superintendency of Companies defined that the real sector of the national economy must implement a Self-Monitoring Integrated Risk Management System for Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction. For this purpose, the Superintendency of Companies issued Basic Legal Circular Letter No. 100-000005 of 2015, modified by Circular Letters No. 100-000005 of November 22, 2017, No. 100-000016 of December 24, 2020, No. 100-000004 of April 9, 2021, and No. 100-000015 of September 24, 2021 (hereinafter, the “Basic Legal Circular Letter”). Within the regulatory developments, the Superintendency of Companies has incorporated international regulations and standards, as well as the guidelines to facilitate the implementation of the System, including not only the risks related to money laundering and financing of terrorism, but also to the treatment of risks related to financing the proliferation of weapons of mass destruction.


The Basic Legal Circular Letter is applicable to companies that (i) develop their activities in certain types of sectors, such as real estate, mining and quarrying, legal services companies, accounting services, collections and/or credit rating, companies that market vehicles, their parts and accessories, to the building construction sector; or (ii) to any other activity, when the company is subject to permanent surveillance or control exercised by the Superintendency of Companies, provided, as of December 31 of the immediately preceding year, they have obtained an income greater than 40,000 Current Minimum Legal Monthly Salaries (hereinafter, the “SMMLV”).

Considering that the gross billing of Rockwell Automation Colombia S.A. (hereinafter, “RA”) as of December 31, 2021 exceeded 40,000 SMMLV, RA is bound to implement a Self-Monitoring Integrated Risk Management System for Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction (hereinafter, the “SAGRILFT” or the “System”); which is documented by this manual (hereinafter, the “Manual”).

This Manual compiles and systematizes the following points:

- (i) The diagnosis of the risks associated with money laundering and financing of terrorism, and financing of the proliferation of weapons of mass destruction (hereinafter, “ML/FT/FPWMD Risks”) to which RA is exposed.
- (ii) a procedure for its treatment and mitigation; and
- (iii) the parameters for its implementation and monitoring.

For these purposes, the general compliance policies established by its parent company (*i.e.*, Rockwell Automation Inc.) (hereinafter, the “Parent Company”) have been taken into consideration.

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A. Background

The main standards that regulate the prevention of ML/FT/FPWMD Risks, on the international and national levels, have served as a guide for the preparation of this Manual.

The Republic of Colombia, through various laws and rulings of the Constitutional Court, has ratified, among others, the following United Nations conventions and agreements, aimed at confronting criminal activities related to ML/FT/FPWMD.


A.1 International Standards

- Vienna Convention of 1988: United Nations Convention Against Narcotic Drugs and Psychotropic Substances Trafficking (Approved by Law 67 of 1993 - Sentence C-176 of 1994).
- Strasbourg Convention of 1990: On laundering, detection, seizure, and confiscation of the proceeds from crime (Approved by Law 1017 of 2006).
- Inter-American Convention against Corruption of 1996 (Approved by Law 412 of 1997).
- United Nations Convention for the Suppression of the Financing of Terrorism of 1999 (Approved by Law 808 of 2003 - Sentence C-037 of 2004).
- Palermo Convention of 2000: United Nations Convention Against Organized Crime (Approved by Law 800 of 2003 - Sentence C-962 of 2003).
- Mérida Convention of 2003: United Nations Convention Against Corruption (Approved by Law 970 of 2005 - Sentence C-172 of 2006).

For its part, the Financial Action Task Force (hereinafter, the “FATF”), an intergovernmental organization whose purpose is to develop and promote measures to combat money laundering and the financing of terrorism, designed 40 recommendations to prevent money laundering, the financing of terrorism, and the financing of the proliferation of weapons of mass destruction.

In February 2012, the FATF reviewed these recommendations and issued International Standards on Combating Money Laundering and the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, and it recommended that countries adopt an approach based on risks with more flexible measures in line with the nature of the risks duly identified.

The "Memorandum of Understanding between the Governments of the States of the Financial Action Task Force of South America against Money Laundering (hereinafter, the

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"GAFISUD")" is relevant for the elaboration of this Manual, by means of which the Financial Action Task Force of South America against Money Laundering (today the Financial Action Task Force of Latin America (hereinafter, the "GAFILAT") was created and put into operation, and it was determined, as an objective, to recognize and apply the FATF recommendations against money laundering and the recommendations and measures adopted by that organization in the future.¹

Finally, the FATF considers that, for this supervisory system to have effective results, countries must ensure effective, proportionate, and dissuasive sanctions, whether criminal, civil, or administrative, applicable to natural or legal persons that fail to comply with measures to combat ML/FT/FPWMD, including their directors and senior management.

A.2 National Standards

The following is a compilation of the main Colombian standards that support the structuring of the present System:


The Organic Statute of the Financial System (hereinafter, the "EOSF"), also known as Decree 663 of 1993, developed by Law 1121 of 2006, established the obligation of financial or supervised entities to adopt appropriate and sufficient control measures aimed at preventing their operations from being used as an instrument to conceal, manage, invest, or take in any way advantage of money or other assets coming from criminal activities or destined to their financing, or to give the appearance of legality to criminal activities or transactions and funds related thereto.

According to the provisions of article 84 of Law 222 of 1995 and Decree 1074 of 2015, the Superintendency of Companies is responsible for monitoring commercial companies, branches of foreign companies, and sole proprietorships. Furthermore, paragraph 3 of article 86 of Law 222 of 1995 states that the Superintendency of Companies, within its duties, is empowered to impose sanctions or fines, successive or not, on those who fail to comply the orders, the law, or the statutes.

Article 10 of Law 526 of 1999, as amended by Law 1121 of 2006, states that the authorities exercising inspection, surveillance, and control duties must instruct their supervised parties on the characteristics, periodicity, and controls in relation to the information to be reported to the Financial Information and Analysis Unit (hereinafter, the "UIAF"), in accordance with the criteria and indications received from the latter.

Article 20 of Law 1121 of 2006 regulates the procedure for the publication of and compliance with the obligations related to international lists binding for Colombia, in accordance with International Law, for which it provides that *"The Ministry of Foreign Affairs shall transmit*

¹ Binding for Colombia through Law 1186 of 2009, declared enforceable through constitutionality ruling C-685 of 2009.

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the lists of persons and entities associated with terrorist organizations, binding for Colombia under International Law and shall request the competent authorities to carry out a verification in the databases in order to determine the possible presence or transit of persons included in the lists and goods or funds related to these.”

Law 1186 of 2009 is declared enforceable through constitutionality ruling C-685 of 2009, with which the “*Memorandum of understanding between the governments of the States of the Financial Action Task Force of South America against Money Laundering (GAFISUD)*” was approved. The objective of GAFISUD is to recognize and apply the FATF Recommendations against money laundering and the recommendations and measures that this body adopts in the future.

Article 7 of Decree 1736 of 2020 establishes in its numeral 28, that it is the function of the Superintendency of Companies to instruct the entities subject to its supervision on the measures to be adopted for the prevention of the risk of money laundering and financing of terrorism and the financing of the proliferation of weapons of mass destruction.


The National Council of Economic and Social Policy - CONPES - approved CONPES Document 3793 of December 18, 2013, whose general objective is to establish the guidelines for the implementation of the National Anti-Money Laundering and Anti-Terrorist Financing Policy. With it, state entities were urged to achieve a sole, coordinated, dynamic, and more effective system for the prevention, detection, investigation, and prosecution of activities related to ML/FT.

Decrees 1966 of 2014, 2095 of 2014 issued by the Ministry of Finance and Sole Regulatory Decree 1625 of 2016, refer to the list of tax havens cataloged as such for the Colombian authorities, are relevant for purposes of identifying with which jurisdictions there is ML/TF Risk when doing business.

ISO 31000 of 2018 on Risk Management, ISO 31010 on Risk Assessment Techniques, and ISO 19600 of 2014 on Compliance Management Systems, establish the methodological bases for determining risks, assessing them, and including these procedures in SAGRILIFT, adopting a decision-making approach based on risk analysis.

Article 2.14.2 of Decree 1068 of 2015 provides that public and private entities belonging to sectors other than the financial, insurance, and securities sectors, must report unusual, suspicious, and attempted transactions to the UIAF, in accordance with paragraph d) of numeral 2 of Article 102 and Articles 103 and 104 of the EOSF, when requested by the UIAF in the required manner and opportunity.

Decree 830 of 2021 of the Presidency of the Republic, regarding Politically Exposed Persons, offers criteria for their identification, which is relevant to the extent that these subjects represent a greater risk that must be mitigated by SAGRILIFT.

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With the issuance by the Superintendency of Companies of Circular Letter No. 100-00005 of 2014, amended in 2016 and 2017, the obligation to implement a SAGRILAFT and report unusual, attempted, and suspicious operations was established for companies in the real sector. This broadened the spectrum of entities liable to have a SAGRILAFT, since not only the entities subject to the supervision of the Superintendency of Finance, but also all those that were subject to supervision by the Superintendency of Companies and that, additionally, had a total income greater than 160,000 SMMLV as of December 31 of the immediately preceding year.

External Circular Letter No. 100-000003 of July 26, 2016, and Resolution No. 100-002657 of July 25, 2016, of the Superintendency of Companies, establish tools to develop and have Business Ethics Programs, which result in better compliance with SAGRILAFT.

External Circular Letter No. 100-000016 of December 24, 2020, amends Chapter X of Basic Circular Letter No. 100-000005 of December 22, 2017 with the aim of including in the System the risks related to the Financing of the Proliferation of Weapons of Mass Destruction ("FPWMD") as an additional risk to Money Laundering and Financing of Terrorism; promotes the use of technological tools for risk segmentation; updates concepts such as final beneficiary, PEP, and includes the concept of foreign PEP and international organizations; changes in the roles and responsibilities of the relevant agents as well as their appointment requirements; and the threshold for implementation of the system is reduced from 160,000 SMMLV to 40,000 SMMLV.


External Circular Letter No. 100-000004 of April 9, 2021, modified paragraphs 5.1.2, 5.1.4.3.1, 5.1.4.5, 5.1.4.8, 5.3.2, 7.1, and 7.2 of External Circular Letter No. 100-000016 of December 24, 2020, updating the requirements to be appointed Compliance Officer; the functions of the Statutory Auditor; and the parameters for enhanced due diligence.

Circular Letter No. 100-000015 of September 24, 2021, amended numerals 2 and 5.3.2 of External Circular Letter No. 100-000016 of 2020, updating the due diligence parameters, including reference to the new definition of "Close Associates" (Article 5 of Decree 830) of 2021, "Final Beneficiary" (Tax Statute Law 2155 of 2021, Article 631-5), "PEP" (Politically Exposed Persons and "Foreign PEPs" (Decree 830 of 2021, Article 2 and 4).

In accordance with this regulatory framework, RA proceeded to carry out an internal analysis of its ML/FT/FPWMD Risks, and instructed its Legal Representative, Compliance Officer, and Alternate Compliance Officer, to develop a Risk System of ML/FT/FPWMD contained in this Manual.

B. Definitions

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

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Virtual Asset: Is a digital representation of value that can be digitally traded or transferred and can be used for payments or investments. Virtual assets do not include digital representations of FIAT currency, securities, and other financial Assets that are already covered elsewhere in the FATF Recommendations.

Assets: Is a present economic resource controlled by the Company as a result of past events.

Geographic Area: Is the area of the territory where the Company carries out its activity.

Directors: Directors are the legal representative, the liquidator, the factor, the members of boards or councils of directors and those who, in accordance with the statutes, exercise or hold these functions.

Relevant Agents: Those natural persons who are bound to provide a personal service and who, due to the characteristics of the tasks they perform, must be periodically trained, and must comply with certain obligations related to SAGRILIFT. These employees should include, among others, the sales force, people who have an impact on the selection or payment of suppliers, people who receive or make payments from the company and, overall, who have an impact on the handling of money, ML/FT/FPWMD risk managers, as well as members of management.


Risk Analysis: Systematic use of available information to determine how frequently specific risk events may occur and the magnitude of their consequences.

Shareholders: They are the so-called partners or shareholders, that is, those people who, in association with another or others, constitute a commercial company for profit, participating in the profits and losses.

Close Associate: Close Associates shall be understood as legal entities that have as directors, shareholders, controlling companies, or managers any of the PEPs listed in article 2.1.4.2.2.3, or that have constituted autonomous estates or trusts for their benefit, or with whom commercial relations are maintained.

Self-Monitoring: Willingness of the employer and directors to detect, control, and manage efficiently and effectively the risks to which they are exposed.

Final Beneficiaries: Pursuant to Article 631- 5 of the Tax Statute; the natural person who ultimately owns or controls, directly or indirectly, a client and/or the natural person on whose behalf a transaction is carried out. It also includes the natural person(s) who exercise effective and/or final control, directly or indirectly, over a legal person or other unincorporated structure.

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The following are the final beneficiaries of the legal entity:

- A natural person who, acting individually or jointly, holds, directly or indirectly, five percent (5%) or more of the capital or voting rights of the legal entity, and/or benefits five percent (5%) or more of the assets, income, or profits of the legal entity; and
- A natural person who, acting individually or jointly, exercises control over the legal entity, by any means other than those established in the previous section of this article; or
- When no natural person is identified in the terms of the two preceding paragraphs of this article, the natural person who holds the position of legal representative must be identified, unless there is a natural person who holds greater authority in relation to the functions of legal representative.


The final beneficiaries of a structure without legal status or a similar structure are the following natural persons who hold the status of:

- Trustor(s), settlor(s), constituent(s), or similar or equivalent position.
- Trustee(s) or similar or equivalent position.
- Trustee committee, financial committee, or similar or equivalent position.
- Trustee(s), beneficiary(s), or conditional beneficiary(s); and
- Any other natural person who exercises effective and/or final control, or who has the right to enjoy and/or dispose of the assets, benefits, results, or profits.
- If a legal entity holds any of the qualities previously established for structures without legal status or similar structures, the final beneficiary will be the natural person who is the final beneficiary of said legal entity in accordance with this article.

Distribution Channel: Own or external structure through which RA products or services are promoted and sold.

Customer: Natural or legal person with whom RA establishes and maintains a contractual or legal relationship for the supply of any product or service.

Counterparties: Natural or legal persons with whom RA has business, contractual or legal ties of any kind. For the purposes of this Manual, reference is made to clients,

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suppliers, employees, shareholders, strategic allies, and other third parties linked to the company's operation.

ML/FT/FPWMD Risk Control: Set of existing policies, processes, practices, or other actions that minimize the Risk of ML/FT/FPWMD in the operations, business deals, or contracts carried out by RA.

Due Diligence: Is the process through which the RA adopts measures to understand the Counterparty, its business, operations, and Products and the volume of its transactions, which is developed as established in section 5.3.1 of Chapter X, of the Basic Legal Circular Letter.

Enhanced Due Diligence: Is the process through which the RA adopts additional and more intense measures to understand the Counterparty, its business, operations, Products, and the volume of its transactions. It implies advanced knowledge of the Counterparty and its Final Beneficiary, as well as the origin of the Assets received, which includes additional activities to those carried out in Due Diligence.

Employees: They are natural persons who are bound to provide a service to another person, natural or legal, under the continuity, direction, or authority of the latter, and for remuneration.

Company: Is the commercial company, sole proprietorship, or branch of a foreign company supervised by the Superintendency of Companies.


Obligated Company: Is the company that must comply with the provisions of Chapter X of the basic and complementary Circular Letter.

Risk Event: ML/FT/FPWMD incident or situation that occurs in RA during a certain time interval.

Sources or Risk Factors: Agents that generate ML/FT/FPWMD Risk in the Company and that must be considered to identify situations that may generate risk in the operations, business deals, or contracts carried out.

Financing of Terrorism ("FT"): Crime committed by any person who engages in any of the behaviors described in article 345 of the Colombian Penal Code.

Financing of the Proliferation of Weapons of Mass Destruction or FPWMD: Is any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, transfer of material, fractionation, transportation, transfer, deposit, or dual use for illegitimate purposes in

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contravention of the national laws or international obligations, when the latter is applicable.

FATF: Acronym for the Financial Action Task Force.

GAFILAT: Is the Financial Action Task Force of Latin America, a regional body of the FATF, which Colombia is a part of.

Tools: Means used by RA to prevent ML/TF/FPWMD risks from occurring and are intended to detect attempted, unusual, or suspicious operations.

Total Revenue: These are all revenues recognized in the statement of income for the period, as the main source of information about RA's financial activity for the reporting period. In accordance with the disclosure criteria, these include: Revenue, other income, gains (other items that meet the definition of revenue but are not Revenue from Ordinary Activities), and financial income.

Revenues from Ordinary Activities: Are revenues generated in the course of RA's main business activities.


Jurisdiction: Place or geographic location in which RA products are promoted, sold or services are provided, whether local or international.

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

Money Laundering (“ML”): Crime committed by any person who seeks to give the appearance of legality to goods or money coming from any of the activities described in article 323 of the Colombian Penal Code.

Binding Lists: These are lists of persons and entities associated with terrorist organizations that are binding for Colombia under Colombian legislation (article 20 of Law 1121 of 2006) and in accordance with 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, and complement it, and any other binding list for Colombia (e.g., Council lists of United Nations Security, OFAC lists, INTERPOL, lists of judicial records of the National Police, lists of terrorist organizations and people classified as terrorists of the European Union, lists of terrorists of the United States of America, among others).

ML/FT/FPWMD Risk Matrix: Is one of the instruments that allows RA to identify, individualize, segment, evaluate, and control the ML/FT/FPWMD Risks to which it could be exposed, in accordance with the identified ML/FT/FPWMD Risk Factors.

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Reasonable Measures: These are sufficient, appropriate, and measurable actions in quality and quantity to mitigate the ML/FT/FPWMD Risk, considering the Liable Company's own risks and their materiality.

Monitoring: Continuous and systematic process through which the efficiency and effectiveness of a policy or process is verified, by identifying its achievements and weaknesses to recommend corrective measures aimed at optimizing the expected results.

Compliance Officer: Natural person designated by RA who is in charge of promoting, developing, and ensuring compliance with the specific procedures for prevention, updating, and mitigation of the ML/FT/FPWMD Risk.


Attempted Operation: It occurs when there is knowledge of the intention of a natural or legal person to carry out a suspicious operation, but it is not perfected because the person who intends to carry it out desists from it, or because the established or defined controls did not allow it to be carried out.

Unusual Operation: Operation whose amount or characteristics are not related to the economic activity of the clients, or which, due to their number, the amounts traded or their particular characteristics, fall outside the parameters of normality.

Suspicious Operation: It is that which, due to its number, quantity, or characteristics, does not fall within the normal systems and practices of business, an industry, or a specific sector and, in addition, according to the uses and customs of the activity in question, could not be reasonably justified.

Politically Exposed Persons (PEP): For the purpose of compliance with the obligations derived from this Manual, during the period in which they hold their positions and during the two (2) years following their departure, resignation, dismissal, or declaration of non-subsistence of the appointment, or in any other form of disengagement, the following will be considered Politically Exposed Persons (PEP):

1. President of the Republic, Vice-President of the Republic, senior advisors, director of the Administrative Department of the Presidency of the Republic, ministers, and vice-ministers.
2. General Secretaries, Treasurers, Financial Directors of the Ministries, Administrative Departments, and Superintendencies.
3. Presidents, Directors, Managers, General Secretaries, Treasurers, Financial Directors of (i) Public Establishments, (ii) Special Administrative

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Units, (iii) Public Utilities Companies, (iv) State Social Enterprises, (v) State Industrial and Commercial Enterprises, and (vi) Mixed Economy Companies.

4. Delegate Superintendents.

5. Generals of the Military Forces and the National Police, and Inspectors of the National Police.

6. Governors, mayors, deputies, councilors, treasurers, financial directors, and general secretaries of i) governors' offices, ii) mayors' offices, iii) municipal and district councils, and iv) departmental assemblies.

7. Senators, Chamber Representatives, General Secretaries, secretaries of the permanent constitutional commissions of the Congress of the Republic and Administrative Directors of the Senate and the House of Representatives.

8. Manager and Joint Directors of Banco de la República.

9. Directors of the Regional Autonomous Corporations.


10. National Commissioners of the Civil Service, Commissioners of the National Television Authority, of the Energy and Gas Regulation Commission, of the Drinking Water and Basic Sanitation Regulation Commission, and of the Communications Regulation Commission.

11. Magistrates, Auxiliary Magistrates, and Counselors of Courts and High Courts, judges of the republic, Attorney General of the Nation, Deputy Attorney General of the Nation, Director of National Prosecutors' Offices, National Director of Sections, and Citizen Security.

12. Comptroller General of the Republic, Vice-Comptroller, Delegated Comptrollers, Territorial Comptrollers, Accountant, Attorney General of the Nation, Vice-Attorney General of the Nation, Delegated Attorneys, Ombudsman, Vice-Ombudsman, Delegated Defenders, and Auditor General of the Republic.

13. Councilors of the National Electoral Council, National Registrar of Civil Status, and Delegated Registrars.

14. Legal representatives, presidents, directors and treasurers of political parties and movements, and other forms of political association recognized by law.

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15. Directors and treasurers of autonomous assets or trusts that manage public resources.

PEP of International Organizations: Those natural persons who exercise managerial functions in an international organization, such as the United Nations Organization, Organization for Economic Cooperation and Development, the United Nations Children's Fund (UNICEF), and the Organization of American States, among others (e.g. directors, deputy directors, members of the board of directors, or any person who performs an equivalent function).

Foreign PEP: Natural persons who perform prominent functions in another country, such as (i) heads of State, heads of Government, ministers, undersecretaries or secretaries of State; (ii) congressmen or parliamentarians; (iii) members of supreme courts, constitutional courts or other high judicial bodies whose decisions do not normally admit of appeal, except in exceptional circumstances; (iv) members of courts or the boards of directors of central banks; (v) ambassadors; (vi) business representatives; (vii) senior officials of the armed forces; (viii) members of administrative, management or supervision of state-owned enterprises, and (ix) legal representatives, directors, deputy directors and/or members of the boards of directors of international organizations; (x) members of reigning royal families; (xi) prominent leaders of political parties or movements.

In no case do these categories include officials at intermediate or lower levels than those mentioned in the previous section.

Policies: Guidelines or orientations that regulate the prevention and control of the ML/FT/FPWMD Risk in RA.


Product: Goods and services offered by RA in development of its corporate purpose.

Suppliers: Those natural or legal persons that provide or supply goods or services to a supervised entity, for the development of its activity and operation, through the execution of a contract.

RA or Rockwell: Rockwell Automation Colombia S.A.

FATF Recommendations: 40 recommendations designed by the FATF with its interpretive notes to prevent the ML/FT/FPWMD Risk.

Internal Reports: Reports made within RA, directed to the Compliance Officer, and made by any employee or member of the organization who has knowledge of a possible attempted, unusual, or suspicious operation.

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ML/FT/FPWMD Risk: Is the possibility of loss or damage that a monitored entity may suffer due to its propensity to be used directly, or through its operations, as an instrument for money laundering, channeling resources to carry out terrorist activities and/or financing of weapons of mass destruction, or when the concealment of assets from such activities is intended.

Contagion Risk: The possibility of loss that a Company may suffer, directly or indirectly, due to the action or experience of a Counterparty.

Legal Risk: The possibility of loss incurred by a Company when it is penalized or bound to indemnify damages as a result of non-compliance with rules or regulations and contractual obligations. It also arises as a consequence of failures in contracts and transactions, derived from malicious actions, negligence or involuntary acts that affect the formalization or execution of contracts or transactions.

Operational Risk: The possibility of incurring losses due to deficiencies, failures or inadequacies in human resources, processes, technology, infrastructure or due to the occurrence of external events. This definition includes Legal and Reputational Risk, associated with such factors.

Reputational Risk: The possibility of loss incurred by a Company due to loss of prestige, bad image, negative publicity, whether true or not, with respect to the organization and its business practices, causing loss of customers, decrease in revenues or legal proceedings.

Inherent Risk: The level of risk inherent to an activity, without taking into account the effect of the controls, Policies and tools applied by the Company.


Residual Risk: The resulting level of risk after applying the controls, Policies and tools applied by the Company to the inherent risk.

RSO: Report of Suspicious Operations; an operation that, due to its number, quantity, or characteristics, is not part of the normal system and practices of the business, of an industry or of a specific sector and, furthermore, in accordance with the uses and customs of the activity in question, has not been reasonably justified.

SAGRILAFT: Self-Monitoring Integrated Risk Management System for Money Laundering and Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction.

Warning Signs: Particular circumstances carried out by the natural or legal person, which call the attention of RA officials and justify further analysis.


SIREL: Is the online reporting system managed by the UIAF.

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Parent Company: Rockwell Automation Inc.

SMMLV: Current Minimum Legal Monthly Salary in the Republic of Colombia.

Financial Information and Analysis Unit (“UIAF”): Special administrative unit, of a technical nature, attached to the Ministry of Finance and Public Credit, whose objective is the prevention of ML/FT/FPWMD Risks.

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II. STAGE 1 - DIAGNOSIS

The diagnosis for the preparation and implementation of this SAGRILAFT has been developed in consideration of the commitment to Self-Monitoring on the part of its Administrators and Shareholders, and the analysis of RA's exposure to the ML/FT/FPWMD Risk. This diagnosis has made it possible to identify Risk Events in RA, as well as the procedures and Tools aimed at their mitigation.

A. Commitment of RA Shareholders and executives

The Administrators and Shareholders of RA are committed to the implementation and continuous evaluation of SAGRILAFT, to the extent that they are aware of the ML/FT/FPWMD Risks to which the company is exposed.

Due to this commitment, in accordance with current regulations, the Shareholders have delegated to the company's Board of Directors the duty of approving and implementing the SAGRILAFT presented by the Legal Representative and the Compliance Officer.

Likewise, this Policy includes obligations for some of the organization's Relevant Employees in order to ensure its correct implementation and monitoring, supported by the penalties for non-compliance. The aforementioned obligations and mechanisms in charge of the different actors are defined later in this Manual.

B. Internal and external context of RA


For the preparation of this SAGRILAFT, the internal and external environment of RA has been analyzed, with the objective of clearly identifying the ML/FT/FPWMD Risks that must be mitigated. For this purpose, the strategic, organizational, and risk management environment of RA was studied.

B.1 The regulatory and business environment of RA

RA is a company that carries out its corporate purpose in constant interrelation with the real sector of the national economy in different industries, such as hydrocarbons, food, infrastructure, mines, and public services, among others. Its offer of goods and services is focused on the automation of processes for these industries and digital training. Specifically, the hydrocarbon sector represents approximately 30% of the Company's sales.

The company develops its corporate purpose through the following activities registered in the Commercial Registry:

- Main activity: ISIC 4669 – Wholesale trade of other products.

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- Secondary activity: ISIC 3319 – Maintenance and repair of other types of equipment and its components.
- Other activities: ISIC 8220 – Call center activities – call center.
- ISIC 6201 – Computer systems development activities.

The main regulations that regulate its activity are:

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

B.2 Identification of interested parties

Third parties interested in RA activity are classified into three groups: (i) Suppliers, (ii) Clients and their Final Beneficiaries, and (iii) public entities that regulate their operation.


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

Despite the above, RA uses third-party national and foreign suppliers to meet specific needs in the development of its products. Internationally, its suppliers are located globally. At the national level, its main suppliers are in the city of Bogotá D.C.

- Customers: RA Clients are private and public companies, mostly national and belonging to the real sector. These Clients are in industries such as oil and gas, mining, cement, consumer goods, vehicles, and health, among others.

The following Clients stand out for each sector of the economy:

- Oil and gas: Ecopetrol, CENIT, and Frontera.
- Mining: South 32 (former 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: Technochemicals and Procaps.

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For its part, the main distributor of RA in Colombia is Melexa S.A.

- iii. Public entities regulating its operation: The relevant entities regarding RA activity are the Ministry of Mines and Energy, the Department of National Planning, the Ministry of Environment and Sustainable Development, the Ministry of Finance and Public Credit, the Superintendency of Companies, the Superintendency of Industry and Commerce, the Bank of the Republic, the National Administrative Department of Statistics, the National Directorate of Taxes and Customs, and other institutional actors that supervise and control their activity and that of their Counterparts.
- iv. Employees: RA employees are mostly Colombian and Venezuelan, with an average age of 35 years, and around 70% men and 30% women. These employees generally work in management, commercial (sales and purchasing) positions, technological developers, etc. At the time of their employment, RA employees declare that they know and accept the Company's policies for the prevention and control of ML/FT/FPWMD risks, by completing Annex G Sole Employee Declaration Form. Internally, a verification of the profiles is carried out for each position in which their suitability for the position for which they are applying is analyzed.

B.3 The strategic direction of the company

RA and the business group to which it belongs are world leaders in the development of industrial automation and computing products. Through its subsidiaries, the Parent Company manages to offer its products globally. Its vision is to be the most valuable provider of automated, control and computing solutions globally.


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

Another relevant opportunity is identified as providing industrial process automation solutions to the oil extractive sector, thanks to the innovation and development of new Products by the business group.

RA's main strength is the international business group that supports it. The above is because this group has sufficient financial resources to make investments in innovation and development, using RA to market automation solutions at the local level.

B.4 Structure of SAGRILAFT in RA

B.4.1 Definition of the objectives of ML/FT/FPWMD Risk Control

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The main objectives of the implementation of SAGRILIFT are aimed at ensuring that RA can fulfill its corporate purpose without being instrumentalized to introduce goods or resources from illicit activities in any jurisdiction, promoting terrorism and the proliferation of weapons of mass destruction. It is one of the company's main goals to develop business within the legal framework and always acting ethically.

The specific objective is to adequately manage the ML/FT/FPWMD Risk, by strengthening the organizational culture within RA and the mechanisms provided for in this Manual, which allow applying Due Diligence, minimizing the risk of loss of financial resources due to sanctions and/or fines by the Control Bodies, avoid investigations and administrative, civil and criminal sanctions for both RA, Shareholders and employees, and in turn, prevent an impact on its reputation.


The main objectives of the implementation of SAGRILIFT are:

- Have a clear and complete identification of the Counterparties to prevent RA from being instrumentalized as a means to develop activities related to ML/FT/FPWMD.
- Have a clear and complete knowledge of the employees and people linked through temporary services companies, in order to have committed and trained human resources in the fight against ML/FT/FPWMD.
- Maintain law enforcement and national and international standards to prevent the development of ML/FT/FPWMD activities.
- Define the policies applicable to Counterparties, employees, Shareholders, and other subjects with whom they enter contracts, operations, and transactions, in order to prevent RA from being instrumentalized by people whose sources or destinations of funds involve illicit activities or that seek to finance terrorism and the proliferation of weapons of mass destruction.
- Identify the Risk Events inherent to the RA operation.

Establish the procedure for the identification, evaluation, and mitigation of ML/FT/FPWMD Risks.

- Comply with the legal provisions, and in particular for the purposes of this Manual, the provisions of the Basic Legal Circular of the Superintendency of Companies.

B.4.2 General framework of the ML/FT/FPWMD Risk Management Policy

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This Manual constitutes the RA Policy for ML/FT/FPWMD Risk Control. It is intended to centralize all the provisions that could be related to the Risk of ML/FT/FPWMD that are scattered in other instruments and protect the company in this regard, as well as their complementation in compliance with the legal framework provided at the national and international level for this purpose.

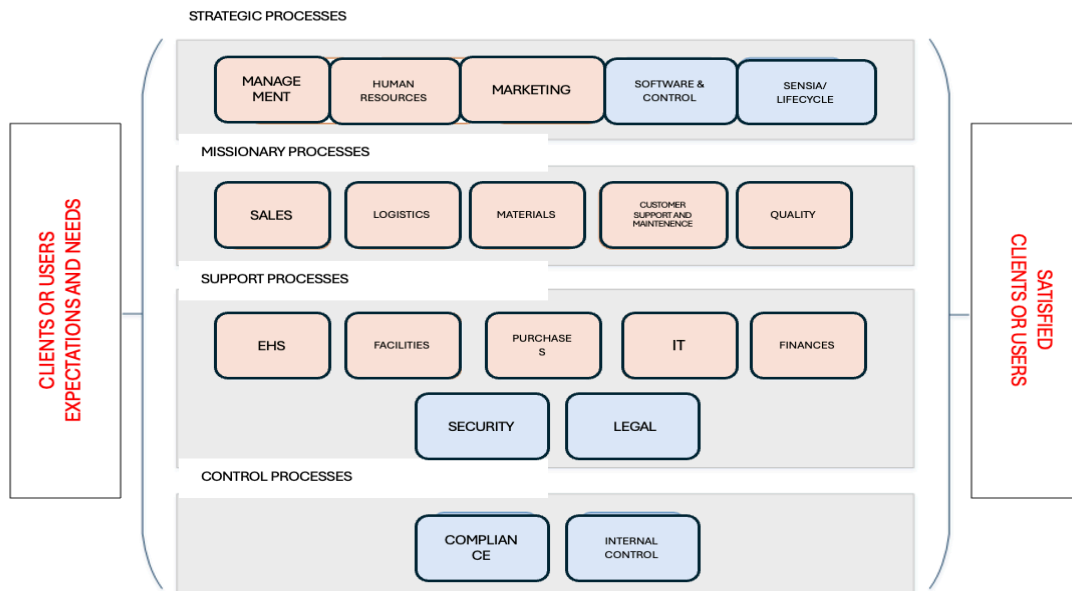
The following are the Policies that make up this SAGRILIFT:

- General System Policies:
 - Policy on Consultation on Restrictive Lists.
 - Knowledge and linkage policy for Suppliers, Clients, Final Beneficiaries, and employees.
 - Policy for carrying out business cooperation, acquisitions, mergers, and virtual or non-face-to-face businesses.
 - Policy for entering new markets or launching new Products.
 - Knowledge policy, due diligence, and involvement of politically exposed persons - PEP.
 - Policy for updating information of the Counterparties.
 - Cash handling policy.
 - Document conservation policies.
 - Policy to support all operations, business deals, and contracts.
 - Policy for requesting information from competent authorities.
 - SAGRILIFT behavior policy.
 - SAGRILIFT training policy.
 - Sanctions policy.
 - FPADM Policy
- Global RA Policies:
 - Global anti-corruption policy.
 - Market access procedure.
 - Code of Conduct.
 - Supplier Code of Conduct.
 - Procedure for government service providers.
 - Policies on limits on gifts and hospitality.

B.4.3 Definition of the organizational structure

The organizational structure involved in compliance with SAGRILIFT is shown below in the company's process map:

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C. Risk Factors (Sources) of ML/FT/FPWMD in RA

RA has developed the analysis of ML/FT/FPWMD Risk Control and the implementation of its Policy, taking into consideration the risks related to the following Sources or Risk Factors:

- Counterparties
- Product
- Distribution channels
- Jurisdiction
- Activity


D. Initial diagnosis of ML/FT/FPWMD Risk

D.1 Initial diagnosis

Hereunder, a general diagnosis of the ML/FT/FPWMD Risk in RA is prepared, which develops the possible Risk Events for each of the Risk Sources defined in the previous section.

This initial diagnosis served as the basis for planning the development of the following stages of the Manual.

D.1.1 Regarding Counterparties

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Most of RA's Clients are large companies with strong internal controls and policies regarding ML/FT/FPWMD Risk. This makes it difficult for RA Clients to be easily affected by ML/FT/FPWMD Risks. However, this System includes policies aimed at regularizing the relationship with Clients and their Final Beneficiaries in order to identify the origin of their resources and their legality.

Specifically with regard to distributors, this Manual is complemented by the Market Access Procedure within the Corporate Policies, with which additional controls are established to guarantee ethical behavior and in compliance with the law on the part of these third parties.

As for the Suppliers, the main one is the Parent Company, which implies that the ML/FT/FPWMD Risk is preliminarily mitigated. However, RA also uses national and international third parties outside the companies of the business group to meet specific needs. The relationship with these Counterparties may represent an ML/FT/FPWMD Risk that is intended to be mitigated with the application of the Policies and Tools contained in this System, specifically in the Procedure for Identification, Measurement and Treatment of ML/FT/FPWMD Risks and the Counterparty Declaration Form.

Additionally, it is a potential risk for RA that legal or natural persons involved in ML/FT/FPWMD activities appear as real beneficiaries of the Counterparties, with judicial proceedings opened for this or even with convictions against them. This is because the public information about the companies found in their Commercial Registry does not detail exactly who their real beneficiaries are. This risk is mitigated with the Tools provided in the Counterparty Declaration Form.

D.1.2 Regarding Products


The Products marketed by RA do not, in principle, represent a considerable ML/FT/FPWMD risk; however, RA will take due diligence to validate and update this information when it deems necessary.

D.1.3 Distribution Channels

RA uses an authorized distributor to market its products in Colombia. It is identified that the use of this commercial strategy represents a ML/FT/FPWMD Risk, since the distributors are specific third parties that could become involved with ML/FT/FPWMD practices. To mitigate this risk, Policies have been included that impose strong controls on the relationship with these third parties (i.e., Market Access Procedure and Counterparty Declaration Form).

D.1.4 Regarding Jurisdiction

Given that the operation is developed, to a large extent, in the international framework between the Colombian Jurisdiction and that of the United States of America, Canada, Ecuador, Mexico, Puerto Rico, Venezuela, Brazil, India, Chile, Costa Rica, Guatemala,

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Panama, Argentina, Holland, and Peru, there is a high risk that if the required levels of care and Due Diligence are not met, RA will be instrumentalized for ML/FT/FPWMD purposes. Additionally, RA has operations with risky jurisdictions for ML/FT/FPWMD purposes, such as the Bolivarian Republic of Venezuela.

Additionally, when analyzing the national jurisdictional scope, it has been identified that there are ML/FT/FPWMD Risks, since RA activity, especially related to the hydrocarbon and mining industry, is concentrated in regions of the country historically affected by violence and criminal activities.

D.1.5 Regarding the Activity

The main activity of the Company for which it receives higher income is the “wholesale trade of products not previously classified” (ISIC 4669) and the maintenance and repair of other types of equipment and its components not previously classified (ISIC 3319). The Company develops and markets products designed for industrial automation, software and spare parts related to engineering services and industrial solutions in coordination with the global activity of the Rockwell Automation business group.

As it is a highly sophisticated activity, it has a high level of surveillance and traceability by the company, its clients are companies with a high degree of compliance with their duties against ML/FT/FPWMD. Therefore, said activity does not represent a considerable level of risk. In any case, the Company will endeavor to have the required diligence to avoid possible risks associated with the Activity.


RA has as complementary activities, (i) call center activities (CIU 8220) and (ii) computer systems development activities (planning, analysis, design, programming, testing) (CIU 6101), which in principle do not represent a considerable risk factor, since the client of these activities is the Rockwell Automation business group, that is, they are aimed at satisfying the group's internal demand for services.

D.2 Associated Risks

By associated risks we refer to those that arise from an ML/FT/FPWMD Event and that may affect RA, its Shareholders, Employees and Counterparties, among others.


In accordance with the Basic Legal Circular Letter of the Superintendency of Finance, these risks are defined as follows:

- **Legal Risk:** It is the RA's risk of being sanctioned, fined, forced to compensate damages to third parties, or to permanently or partially close operations, as well as being subject to other legal implications derived from the Risk of ML/FT/PWMD.
- **Risk of Economic Affection:** The risk that RA will be sanctioned or fined for

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investigations related to ML/FT/FPWMD Risk Events, including the cost of defending the company in these events.

- **Reputational Risk:** It is the possibility of loss incurred by a company due to discredit, bad image, negative publicity, whether true or not, regarding the institution and its business practices, which causes loss of Clients, decrease in income, or connection to judicial processes.
- **Operational Risk:** It is the possibility of being used in ML/FT/FPWMD activities and that this results in deficiencies or failures in the human resources, processes, technology, or infrastructure of the company.
- **Contagion Risk:** It is the possibility of loss that a company may suffer, directly or indirectly, due to the action of another company in the same business group or closely related to it.

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III. STAGE 2: RELEVANT SAGRILAFT AGENTS AND EMPLOYEES


The following RA officials must carry out direction, supervision, management, support, execution and/or support tasks, for the correct implementation, development, and monitoring of SAGRILAFT.

A. Those responsible for the direction and supervision of SAGRILAFT

A.1. Board of Directors

As the main administrative body of RA, the Board of Directors has the following responsibilities and functions in relation to SAGRILAFT:

- Establish and approve an ML/FT/FPWMD policy for the Company.
- Approve modifications and updates to the System, leaving evidence in the corresponding minutes of the meeting where the approval, modification or addition is made.
- Supervise and demand compliance with SAGRILAFT from the Legal Representative, Compliance Officer, and other officials deemed appropriate.
- Make the decision to sanction collaborators who do not comply with the System with application of the Sanctions Policy.
- Select and appoint the main and alternate Compliance Officer.
- Know, monitor, and approve the SAGRILAFT reports presented by the Legal Representative, the Compliance Officer, or the Tax Auditor.
- Establish and monitor procedures aimed at allowing effective, efficient, and timely verification of the information provided by potential clients in know-your-client procedures.
- Guarantee the sufficiency of the technical and human resources necessary to implement and maintain the operation of SAGRILAFT.
- Analyze and make timely decisions on SAGRILAFT operating reports, reports, requests, corrective proposals, and updates submitted by the Compliance Officer, statutory auditor, internal and external audit and/or the Legal Representative.
- Organize and guarantee the technical, logistical, and human resources necessary to implement and maintain SAGRILAFT in operation, according to the requirements made by the Compliance Officer.


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- Establish the criteria to approve the Counterparty connection when it is a PEP.
- Establish guidelines and determine those responsible for carrying out audits on the compliance and effectiveness of SAGRILAFT if so determined.
- Verify that the Compliance Officer has the availability and capacity necessary to carry out his or her duties.
- Verify that the Company, the Compliance Officer, and Legal Representative carry out the activities and duties assigned by means of this Manual and the regulations on SAGRILAFT matters, especially the provisions of the Basic Legal Circular Letter and complementary.

A.2 Legal Representative

For the operation of the SAGRILAFT system, the Legal Representative is required to fulfill the following duties:

- Submit, along with the Compliance Officer, the SAGRILAFT project and its updates to the Board of Directors for study and approval.
- Submit, along with the Compliance Officer, the project of modifications to SAGRILAFT when considered prudent.
- Have the System approved by the RA Board of Directors.
- Submit to the Board of Directors the reports, requests, and alerts about SAGRILAFT that they consider should be processed by said body.
- Have the operational, economic, physical, technological and resource measures that are necessary so that the Compliance Officer can launch the SAGRILAFT and develop the monitoring tasks for its compliance.
- Verify that the Compliance Officer has the availability and capacity necessary to carry out his or her duties.
- Know and follow up on the critical points contained in the SAGRILAFT reports presented by the Compliance Officer or the Statutory Auditor, with the obligation to report them to the Board of Directors.
- Submit the relevant recommendations to the Board of Directors about the System.
- Ensure that the activities resulting from SAGRILAFT are properly documented.

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- Provide effective, efficient, and timely collaboration to the Compliance Officer.
- Evaluate the recommendations and reports presented by the Compliance Officer.
- Certify to the Superintendency of Companies compliance with the provisions of Chapter X of the Basic and complementary Circular.
- Know about Unusual, Attempted, and Suspicious Operations reported by the Compliance Officer to the UIAF.
- Include a report on the status of implementation and results of SAGRILIFT in the annual report of the Administration to the General Assembly of Shareholders.
- Study the results of the ML/FT/FPWMD Risk evaluation carried out by the Compliance Officer and determine the corresponding action plans.
- Efficiently allocate the technical and human resources determined by the Board of Directors or the highest social body necessary to implement SAGRILIFT.

B. Responsible for management - Compliance Officer

B.1 Profile and requirements for the appointment of the main and alternate Compliance Officer.

The Compliance Officer must actively participate in the design, direction, implementation, audit, compliance verification and monitoring procedures of SAGRILIFT, and be able to make decisions regarding ML/FT/FPWMD Risk management. The Compliance Officer, whether main or alternate, must comply with the requirements required by law for his or her appointment and permanence in office, namely:

- Make decisions to manage the ML/FT/FPWMD Risk and have direct communication with, and report directly to, the Board of Directors.
- Have sufficient knowledge of risk management and understand the ordinary course of the Company's activities.
- Have the support of a human and technical work team, in accordance with the ML/FT/FPWMD Risk and the size of the Company.
- Not belong to the management or corporate bodies, to the statutory auditors (to act as statutory auditor or to be linked to the statutory audit firm that performs this function, if applicable), or to act as internal auditor, or whoever performs similar functions or acts as such in the Company. It should not be understood that such prohibition extends to those who support the work of the auditing or internal control bodies.


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- Not serve as a Compliance Officer in more than ten (10) Companies. To serve as Compliance Officer for more than one Liable Company.
- Certify that they do not act as such in competing companies.
- When the Compliance Officer is not linked to the Company, this natural person and the Company must demonstrate that in their professional activities they comply with the minimum measures established in section 5.3.1 of chapter X of the Circular.
- When there is a corporate group or a declared situation of control, the Compliance Officer of the parent or controlling company may be the same person for all the companies that make up the group or conglomerate, regardless of the number of companies that make up the group or conglomerate.
- Be domiciled in Colombia.
- Hold a professional degree.
- Accredited minimum experience of six (6) months in the performance of positions related to the administration of SAGRILIFT.
- Accredited knowledge in ML/FT/FPWMD Risk management through specialization, courses, diplomas, seminars, conferences or any other similar, including, but not limited to, any training program that is or will be offered by the UIAF to the actors of the national anti-money laundering and counter-terrorism financing system.


B.2 Duties of the Compliance Officer

The Compliance Officer, or in his/her absence, the Alternate Compliance Officer, are responsible for the execution and monitoring of SAGRILIFT. For this purpose, he/she must perform the following duties:

- Oversee and direct the design of the System.
- Ensure effective, efficient, and timely compliance with the System, as well as promote the adoption of amends and updates to it.
- Lead the approval process of third parties for their association with the company.
- Submit reports to the Board of Directors at least semiannually, referring to at least the following aspects:
 - The results of the management carried out in terms of efficiency and effectiveness.
 - The compliance given in relation to the sending of reports to the different authorities.
 - General compliance with the System.
 - The individual and consolidated evolution of the Risk Factors and Controls adopted, as well as the Associated Risks.
 - The effectiveness of the mechanisms and instruments established in the System, as well as the measures adopted to correct their flaws.

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- The results of the corrective measures ordered by the Board of Directors.
 - The documents and pronouncements issued by the control entities and the UIAF.
- Propose corrections and updates to the Manual and Policies to the Legal Representative.
- Ensure that Relevant Employees and officials exposed to the Risk of ML/FT/FPWMD carry out a self-assessment of their management annually.
- Ensure compliance with the System's training and dissemination program to officials and interested parties.
- Implement internal training and dissemination programs to generate a culture of prevention of ML/FT/FPWMD activities.
- Submit the requirements for computer, technological, physical, and human resources necessary for the fulfillment of his/her functions, which have been identified autonomously or with the help of third parties, to the Legal Representative.
- Respond to and coordinate any requirement, request, or diligence from a judicial or administrative authority regarding ML/FT/FPWMD.
- Carry out semi-annual monitoring of SAGRILAF.
- Know and manage the complaints, concerns, or dilemmas presented by officials in relation to the Risk of ML/FT/FPWMD.
- Design or modify existing methodologies for segmentation, identification, measurement, and control of ML/FT/FPWMD Risk that will be part of the system.
- Report Attempted and Suspicious Operations to the UIAF and inform the Legal Representative and the authorities about the matter. If the absence of Suspicious Operations is evident, the Compliance Officer will have to present reports of absence of operations (AROS) within the terms provided by law.
- Evaluate the reports presented by the Statutory Auditor, internal audit and/or external audit and adopt the measures it deems appropriate in response to the reported situations.
- Ensure the proper filing of documentary supports and other information related to the management and prevention of ML/FT/FPWMD Risk. For the proper exercise of his/her duties, the Compliance Officer shall have access to the information and documents necessary to carry out of his/her responsibilities, therefore, the areas of

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administration, management, and control bodies shall provide the information that is required by him/her.


- Execute, with support from the Human Resources department, the sanctions adopted for those officials who fail to comply with the obligations of the System.
- Follow up on complaints made through the Ombudsman² or any other means of reporting.
- Carry out the other duties that assist him/her in accordance with this Manual.
- Approve all decisions related to Events whose analysis results show Intolerable, Extreme, and High Risk for RA.
- Certify before the Superintendency of Companies compliance with the provisions of the complementary and Basic Legal Circular Letter, as required by the Superintendency of Companies.
- Manage compliance with Due Diligence and Enhanced Due Diligence procedures.
- In the event that any good, Asset, Product, fund, or right owned by or under the administration or control of any country, person or entity included in the Binding Lists is identified, the Compliance Officer must immediately report to the UIAF and bring it to the attention of the Attorney General's Office.

B.3 Norms against disqualifications or conflicts of interest of the Compliance Officer

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

- He/she has relatives up to the third degree of consanguinity, second degree of affinity or first civil degree, regarding people involved with activities or operations related to ML/FT/FPWMD.
- Due to the difference in the duties that pertain to the statutory auditor, internal auditor, director and Compliance Officer, the statutory auditor, internal auditor, or director should not be designated as Compliance Officer.
- He/she has not provided all the necessary information in the safety and due diligence studies carried out by RA at the time of his/her employment.

² Anonymous reporting system available at a global level for the companies that make up the business group of the Parent Company.

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- He/she does not have sufficient independence and leadership and management skills.
- He/she has ever committed crimes associated with the risk of ML/FT/FPWMD.
- Other factors determined by the Board of Directors.

Likewise, it is possible that situations may arise regarding the Compliance Officer, once he/she has been appointed by the Board of Directors, which may affect his/her independence, and for this reason, his/her ability to properly perform the duties of his/her position may be compromised. Whenever it is possible to verify that he/she is in a situation that compromises his or her independence and objectivity, the Compliance Officer must report such situation to the Legal Representative and distance himself or herself from any decision or report that may be prepared in this matter.

Failure to comply with this provision will lead to the sanctions provided for in this Manual, without prejudice to the respective legal actions that failure to comply with this obligation may entail.

C. Those responsible for execution and support

C.1 Ombudsman

Stakeholders can anonymously report ML/FT/FPWMD Risk Events, as well as conducts or situations that imply a ML/FT/FPWMD Risk, through the Ombudsmann Alertline website³, to emailombuds@ra.rockwell.com; or by calling 1-800-522-3589 (USA).


The department in charge of managing these complaint channels must report to the Compliance Officer monthly on the complaints filed with them, or the absence of such complaints.

C.2 Purchase Department

C.2.1 Strategic Sourcing (SSO)

- Execute the procedures defined in the Corporate Policies regarding the Anti-Corruption Policy, Supplier Code of Conduct, as well as the Sole Counterparty Declaration Form, for the effective knowledge and identification of RA Suppliers.
- Compile and validate the information provided by the Suppliers to verify that it is complete and complies with the Policies established by RA for its connection,

³ <https://www.rockwellautomation.com/global/about-us/contact/overview.page?pagetitle=Contact-the-Ombudsman&docid=de47809d0883aea2502600f7215a7bc6>


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analyzing its consistency and reasonableness.

- Request to the Compliance Officer for approval to contract suppliers in accordance with the Due Diligence process.
- Structure and develop, in coordination with the Compliance Officer, outreach, and training programs on SAGRILIFT.
- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement, and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Execute Supplier segmentation processes to determine their risk level. To do this, the provisions of the Procedure for Identification, Measurement, and Treatment of ML/FT/FPWMD Risks for Mitigation must be followed.
- Monitor Suppliers' operations and report Unusual, Suspicious, and Attempted Operations to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Operations and using the Unusual, Suspicious, and Attempted Operations Report Form.
- Collaborate in the execution of the Counterparties' information updating strategies.
- Keep a record of all the operations that RA carries out regarding its Suppliers.
- Evaluate the Counterparties in accordance with the parameters set forth in this Manual.
- Report and update Supplier information in the records determined by RA.

C.2.2. Customer Support and Maintenance (CSM)

- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Report Unusual, Suspicious, and Attempted Operations in the development of their activities under their responsibility to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Operations and using the Unusual, Suspicious, and Attempted Operations Report Form.
- Request the Compliance Officer for approval to contract with suppliers in accordance with the Due Diligence process.


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C.2.3. Life Cycle

- Execute the procedures defined in the Corporate Policies regarding the Anti-Corruption Policy, Supplier Code of Conduct, as well as the Sole Counterparty Declaration Form, for the effective knowledge and identification of RA Suppliers.
- Compile and validate the information provided by the Suppliers to verify that it is complete and complies with the Policies established by RA for its connection, analyzing its consistency and reasonableness.
- Request the Compliance Officer for approval to contract with suppliers in accordance with the Due Diligence process.
- Structure and develop, in coordination with the Compliance Officer, outreach and training programs on SAGRILIFT.
- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Execute Supplier segmentation processes to determine their risk level. To do this, the provisions of the Procedure for Identification, Measurement, and Treatment of ML/FT/FPWMD Risks for Mitigation must be followed.
- Monitor Suppliers' operations and report Unusual, Suspicious and Attempted Operations to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Operations and using the Unusual, Suspicious and Attempted Operations Report Form.
- Collaborate in the execution of the Counterparties' information updating strategies.
- Keep a record of all the operations that RA carries out with respect to its Suppliers.
- Evaluate the Counterparties in accordance with the parameters set forth in this Manual.
- Report and update Supplier information in the records determined by RA.


C.3 Sales Department

- Execute the procedures defined in the Customer, Supplier and Employee Knowledge Policy, for effective prior knowledge of Customers and their Final Beneficiaries if

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applicable.

- Verify the identity of potential Clients and their Final Beneficiaries, using digital signature certificates, biometrics, and/or any other technological mechanism that guarantees effective verification of the identity of the potential client.
- Structure and develop, in coordination with the Compliance Officer, outreach and training programs on SAGRILIFT.
- Identify and take reasonable measures to verify the identity of the relevant natural person who holds the position of highest management official, in the event that no natural person is identified under the guidelines established for the Final Beneficiary.
- Collect and validate the information provided by Clients to verify that it is complete and complies with the Policies established by RA for its connection, analyzing its consistency and reasonableness.
- Request the Compliance Officer for approval to contract with direct clients in accordance with the Due Diligence process.
- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Execute Supplier segmentation processes to determine their risk level. To do this, the provisions of the Procedure for Identification, Measurement, and Treatment of ML/FT/FPWMD Risks for Mitigation must be followed.
- Monitor Suppliers' operations and report Unusual, Suspicious and Attempted Operations to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Operations and using the Unusual, Suspicious and Attempted Operations Report Form.
- Collaborate in the execution of Client information updating strategies.
- Keep a record of all the operations that RA carries out with respect to its Clients.
- Evaluate the Counterparties in accordance with the parameters set forth in this Manual.
- Report and update Client information in records determined by RA.
- Conduct ongoing due diligence of the business relationship with Customers, and examine transactions carried out throughout such relationship, to: i) monitor that


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transactions carried out are consistent with RA's knowledge of the Customer, and ii) ensure that documents, data or information collected under the know-your-customer process, are kept up to date at least every 2 years.

- Ensure Due Diligence and Enhanced Due Diligence procedures are carried out in all operations carried out by the area in cases where this is required.
- Follow the Market Access Procedure contained in the Corporate Policies for linking distributors.
- Inform and make this Manual available to distributors.
- Ensure that RA distributors subject to SAGRILIFT, by including contractual clauses that provide for it, as well as by signing the Counterparty Declaration Form.
- Report and update distributor information in records determined by RA.

C.4 Human Resources Department (HR)

- 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.
- Request approval from the Compliance Officer for employee candidates in accordance with the Due Diligence process.
- Follow up on Employees and report Unusual, Suspicious and Attempted Operations to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Operations and using the Unusual, Suspicious and Attempted Operations Report Form.
- Structure and develop, in coordination with the Compliance Officer, training programs on SAGRILIFT.
- Report to the Compliance Officer, cases where situations of violation have been found to SAGRILIFT for analysis.
- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Ensure that all RA's workforce, including direct employees or persons hired through temporary service companies, are aware of the SAGRILIFT; to this end, (i) make this Manual available to employees, (ii) have them sign the Counterparty Declaration

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Form, and (iii) provide training to RA's personnel with the support of the Compliance Officer.


- Report and update employee information in records determined by RA.

C.5 Finance Department

- Define Warning Signs.
- Report Unusual, Suspicious, and Attempted Operations to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Transactions and using the Unusual, Suspicious and Attempted Transactions Report Form.
- Keep the Counterparties financial information updated.
- Verify that payments are not made or collections received that exceed the limits defined in the Cash Management Policy.
- Do not allow the transfer of resources to third parties other than those who are legally linked to the Company.
- Send the required inputs for reporting operations to the applicable authorities to the Compliance Officer.
- Send the information required to monitor commercial relationships with the Counterparties to the Compliance Officer.

C.6 Marketing Department

- Support the Compliance Officer in outreaching SAGRILAFT.
- Support the strategies defined by RA aimed at achieving timely and effective communication of issues related to ML/FT/FPWMD.
- Carry out monitoring in the different media in order to detect situations that put RA's reputation at risk.
- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Report Unusual, Suspicious and Attempted Transactions to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Transactions and using the Unusual, Suspicious, and Attempted Transactions Report Form.

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C.7 Technology Department (IT)


- Support the availability of Tools that allow carrying out activities for the monitoring of ML/FT/FPWMD.
- Support the Compliance Officer in the management and care of the digital file of media related to the management and prevention of ML/FT/FPWMD Risk.
- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Support the strategies defined by RA aimed at achieving timely and effective SAGRILAFT communication among RA employees, making the necessary technological tools available to the Compliance Officer.
- Support the correct functioning of reporting channels such as the Compliance Officer's Email and the Helpline/message box for employees and citizens.

C.8 Legal Department

- Advise the Compliance Officer on legal matters in the development of their activities.
- In coordination with the Compliance Officer, guide and provide legal advice to the entity in the responses requested by the Control Organisms regarding SAGRILAFT.
- Negotiate in the contracts signed by RA the inclusion of clauses that allow it to terminate the contractual relationship in the event that the Counterparty becomes involved in issues related to ML/FT/FPWMD.
- Negotiate in the contracts signed by RA the inclusion of clauses that bind the Counterparty to know and subject to the System.
- Verify that the operations, business deals, and contracts executed by RA comply with Corporate Policies and the law.
- Support the areas that require it in the Due Diligence and Intensified Due Diligence procedures.

C.9 Internal Audit

- Report in writing to the Board of Directors, the Legal Representative, or the Compliance Officer, in regard to the compliance or non-compliance with the


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provisions contained in this Manual.

- Inform the Legal Representative and the Compliance Officer of any inconsistencies and deficiencies detected regarding the implementation of SAGRILAFT.
- Provide reports on compliance with the policies established by the Company regarding ML/FT/FPWMD when requested by any authority.
- Submit a report to the Compliance Officer when, during his/her audit work, he/she identifies Unusual, Suspicious or Attempted Operations that may put RA at risk under the provisions of this Manual.
- Submit a report to the Compliance Officer about the compliance with this Manual, when requested by the Compliance Officer.

C.10 Operations

- Execute the procedures defined in the Corporate Policies regarding the Anti-Corruption Policy, Supplier Code of Conduct, as well as the Sole Counterparty Declaration Form, for the effective knowledge and identification of the Suppliers directly contracted.
- Compile and validate the information provided by the Suppliers under their charge to verify that it is complete and complies with the Policies established by RA for its connection, analyzing its consistency and reasonableness.
- Ensure that the Supplier, the Legal Representative, members of the Board of Directors and shareholders with a shareholding equal to or greater than 5%, are not reported in the lists defined in the Restricted Lists Policy.
- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Execute Supplier segmentation processes to determine their risk level. To do this, the provisions of the Procedure for Identification, Measurement, and Treatment of ML/FT/FPWMD Risks for Mitigation must be followed.
- Follow up on Suppliers' operations and report Unusual, Suspicious and Attempted Operations to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Operations and using the Unusual, Suspicious and Attempted Operations Report Form.
- Collaborate in the execution of the Counterparts' information updating strategies.

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- Keep a record of all the operations that RA carries out with respect to the Suppliers under its charge.
- Evaluate the Suppliers in their charge according to the parameters set forth in this Manual.
- Report and update the Suppliers’ information under their charge in the records determined by RA.

C.11 Logistics Department


- Define and identify Warning Signs and analyze them considering the procedure for the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation.
- Report Unusual, Suspicious and Attempted Operations in the development of their activities under their responsibility to the Compliance Officer, in accordance with the Methodology for Identifying Unusual, Attempted Operations and using the Unusual, Suspicious and Attempted Operations Report Form.
- Verify that the operations, business deals, and contracts executed by RA comply with Corporate Policies and the law.

C.12 Statutory Auditor

The duties of the Statutory Auditor are indicated in article 207 of the Code of Commerce, which indicates, especially, those related to the obligation to report Suspicious Operations to the UIAF. For these purposes, the statutory auditor must request a username and password in SIREL to send the ROS.

Therefore, without limitation, the duties of the Statutory Auditor will be the following:

- Inform the Compliance Officer of the inconsistencies and failures detected in the SAGRILIFT, and overall, any non-compliance detected with the provisions that regulate the matter.
- Report the operations classified as suspicious under the terms of literal d) of numeral 2 of article 102 of Decree-Law 663 of 1993 to the UIAF, when he/she becomes aware of them within the ordinary course of his/her work.
- Notwithstanding the obligation to maintain professional confidentiality, when in the course of his/her work, information is discovered that leads to the suspicion of


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possible ML/FT/FPWMD acts, he/she has the obligation to refer the suspicions to the competent authority.

- He/she is allowed by the general duty to report framed in article 67 of the Code of Criminal Procedure and article 32 of Law 1778 of 2016.

C.13 All RA employees at large

It is up to all RA officials to know and comply with SAGRILAFT, to prevent the company from being used as an instrument to give legality to ML/FT/FPWMD activities.

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IV. STAGE 3: IDENTIFICATION OF ML/FT/FPWMD RISK EVENTS IN RA

This stage includes risk analysis, aimed at planning, organizing, directing, and controlling activities related to the identification, measurement, and treatment of the risks to which RA is exposed in terms of ML/FT/FPWMD.


The above has the purpose of defining an appropriate organizational response that allows risks to be eliminated, minimized, retained, mitigated, or transferred.

RA has a developed Risk Matrix in accordance with different Risk Factors (*i.e.*, Counterparties, Jurisdiction, Distribution Channels, Activity and Product). The Risk Matrix has been built based on the Risk Events preliminarily identified by the different areas of the company and will be updated annually with the direction of the Compliance Officer.

Considering that not all Risk Events can be foreseeable, the Risk Matrix must be re-evaluated and updated annually by the Compliance Officer, who will rely on the leaders of the different departments 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 must follow the ML/FT/FPWMD Risk Identification, Measurement, and Treatment Procedure for Mitigation.

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V. STAGE 4: PROCEDURE FOR IDENTIFICATION, MEASUREMENT, AND TREATMENT OF ML/FT/FPWMD RISKS FOR THEIR MITIGATION

A. Generalities of the procedure

RA developed the following methodology for assessing ML/FT/FPWMD Risks. This allows to make informed decisions regarding each of the Risk Events that arise in relation to the Company. The methodology involves the application of the following steps:

Identification of the Risk Event

The RA Employee identifies the ML/FT/FPWMD Risk Event, informing themselves about the details of said event and notifying the Compliance Officer through the reporting channels enabled by RA.

Inherent Risk Calculation

The Compliance Officer analyzes the Probability of Occurrence and Impact of the Risk Event in order to calculate its Inherent Risk.

Residual Risk Calculation

The Compliance Officer assesses the controls related to the Risk Event in light of the Inherent Risk. The above is to obtain the calculation of the Residual Risk (*i.e.*, the real risk after applying the Company's controls).

Decision-making regarding the Risk Event

With the results obtained regarding the Residual Risk, the Compliance Officer makes the most appropriate decision to prevent the materialization of the ML/FT/FPWMD Risk, which must be documented according to the provisions of this Manual.


B. Procedure flowchart

RA officials must implement the following procedure for mitigating the ML/FT/FPWMD Risk, when, in the development of the actions in their position, they identify the presence of a Risk Event.

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 B of this Manual. Subsequently, the Employee must

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collect all relevant information about the specific case for the overall assessment of the Risk Event.

2. Notice to Compliance Officer

The official who has identified the Risk Event must present it to the Compliance Officer through any of the enabled reporting channels. Rockwell has several Reporting Channels that allow effective communication and reporting of activities related to ML/FT/FPWMD. In this way, different physical, virtual and telephone means have been established so that any interested person, including employees, clients, suppliers and third parties, can report this information. Below are the available channels:

- Compliance Officer Email:

Rockwell has an email address specially designated for direct and exclusive communication with the Compliance Officer. Any person may send reports of risk events at any time to this medium.

Email address:

oficialdecumplimientocol@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 its employees can report risk events at any time in their workplace.
(Annex E).

- Support Line/Ombudsman

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

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3. Measurement of Probability of Occurrence

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 4, Section C.1, of this Manual.

4. Impact Measurement

The Compliance Officer must identify the Impact of the specific Risk Event, in accordance with the Impact Matrix included in Stage 4, 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 4, 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 4, Section D.3, 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 or not 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 areas, 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 ML/TF/FPWMD Risks (Annex D).

C. Inherent Risk Analysis

The prevention of the ML/FT/FPWMD Risk entails the need to identify the Inherent Risk

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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:

| 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 | I | 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 ML/FT/FPWMD 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. |

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

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:

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| 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 ML/FT/FPWMD risk.


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 SAGRILIFT are defined as the Corporate Policies, activities and procedures aimed at mitigating adverse risks for compliance with the ML/FT/FPWMD 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 in order to reduce the Probability of Occurrence.

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- 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 ML/FT/FPWMD 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 ML/FT/FPWMD Risk. |
| Moderate | 2 | Formal and informal activities are carried out to partially mitigate or manage the ML/FT/FPWMD Risk in a Preventive manner. |
| Strong | 1 | Sufficient activities are carried out to mitigate or fully manage the ML/FT/FPWMD Risk. |

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.

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The calculation of Residual Risk allows us 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 located 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 |

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.

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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 ML/FT/FPWMD Risk Decision Report Form.

E. Treatment of ML/FT/FPWMD Risks

E.1 ML/FT/FPWMD 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 ML/FT/FPWMD 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 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.

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- Understanding of the typologies of ML/FT/FPWMD 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 instruments to prevent and control the ML/FT/FPWMD Risks to which the Company is exposed is the application of Due Diligence measures, which must be applied within the material characteristics of the company's operation. In order to determine the scope to which Due Diligence measures should be subjected, there is an analysis of the operations, product, contracts, counterparties, countries, geographic areas, channels, and activity developed in particular, which should be appropriate to the nature and size of the business.

F.1. Due diligence

The Company must adopt Reasonable Due Diligence Measures to inform the Counterparty, for this purpose, it must adopt the following minimum measures prior to its relationship with third parties:

- Identify the Counterparty and verify its identity using documents, data, or reliable information from independent sources.
- Identify the Final Beneficiary of the Counterparty and take Reasonable Measures to verify their identity.
- In the case of Legal Entities, Reasonable Measures must be taken to know their ownership structure in order to obtain the name and identification number of the Final Beneficiary. The measures taken must be proportional to the level of risk and its materiality 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%).
- Understand and, where appropriate, obtain information about the intended purpose and nature of the business relationship.

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- e) Conduct ongoing Due Diligence of the business relationship and review transactions carried out 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 the source of funds giving rise to the business relationship.
- f) Constantly consult the Binding Lists of the Superintendence of Companies, in this way guarantee compliance with international and national obligations for risk prevention.
- g) Have a database that contains the following information regarding the Counterparties: name of the Counterparty, whether natural or legal person, identification, address, Final Beneficiary, name of the legal representative, contact details and position held, date of the process of knowledge and follow-up of the Counterparty.
- h) 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.
- i) In the event that 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 beginning of the contractual or legal relationship, must have complied with the Due Diligence procedures that are part of the SAGRILIFT, attaching for such purpose 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 ML/FT/FPWMD Policy, the Company may complete the verification after the business relationship has been established. The request and authorization for exceptional hiring must be documented.

If in these exceptional events, the Company cannot carry out the Due Diligence satisfactorily once the business relationship is established, the Company must evaluate the continuity of the Contractual relationship and if it is appropriate to make a ROS in relation to the Counterparty.

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 State companies, 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

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purpose and nature of the relationship. In these cases, it will not be necessary to attach the Counterparty Declaration Form or supporting documentation.

F.3 Exceptional Approval on Grounds of Emergency

The Compliance Officer may be requested to approve a provisional relationship 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. Suppliers whose connection is considered urgent, since if the purchase is not made, it could affect the normal course of the operation.
2. Clients with complex corporate structures that prevent easy collection of the Sole Counterparty Declaration Form and other required documents.
3. Critical clients for whom it has not been possible to collect the Sole Counterparty Declaration Form and other required documents at the time of signing the contract.

The requesting officer must submit the request to the Compliance Officer, indicating (i) the company name of the third party, type of identification and identification number, (ii) the purpose of the contract to be entered into 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 such period of time as he or she deems appropriate for the applicant to submit 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 received, which includes additional activities to those carried out in Due Diligence.

Enhanced Due Diligence must be applied to:

- Counterparties and their Final Beneficiaries who
 - The Company considers that they represent a greater risk.
 - Are identified as PEP; which will be extended to (i) the spouses or permanent partners of the PEP, (ii) the relatives of the PEP, up to second degree of consanguinity, second degree of affinity, and first civil degree; and (iii) to Close Associates; and
- Counterparties that develop activities with Virtual Assets.

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- Counterparties located in countries identified by FATF as non-cooperative and high-risk jurisdictions⁴.

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

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

VI. STAGE 5: DOCUMENTATION, DISCLOSURE, AND TRAINING

The correct implementation of SAGRILAFT depends largely on a strong training and outreach campaign within the organization, accompanied by clear processes for reporting risk events and documentation of the system. Consequently, the Company has the obligation to correctly document and record everything related to SAGRILAFT, to ensure the integrity, timeliness, reliability, confidentiality, and availability of the information, for which it has a clear Documentation Storage Policy.

The processes and activities must be documented in accordance with the aforementioned policy and must comply with the following principle: All transactions, minutes, reports, decisions, reports, analysis, activities, and Treatment Plans related to SAGRILAFT must be documented and archived in the custody of the Compliance Officer. Likewise, in order to have a successful implementation, RA has defined dissemination and training procedures for the System that 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 due and timely diligence can be accredited within the Company's knowledge of the counterparty.

A. System Documentation, its stages, and elements

RA must have the following documented processes:

- The Self-Monitoring Risk Management System for Money Laundering and Financing of Terrorism, with its respective annexes.

⁴The high-risk countries or jurisdictions according to the FATF definition are published at the following link: https://www.uiaf.gov.co/asuntos_internacionales/lista_paises_no_cooperantes_29282

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- The development of the provisions of the Procedure for Identification, Measurement, and Treatment of ML/FT/FPWMD Risks for Mitigation must be documented by completing the ML/FT/FPWMD Risk Decision Report Form.
- The documents that support the design, development, and implementation of the SAGRILAFT methodologies.
- The documents and records that evidence 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, Attempted and Suspicious Operations.
- The reports to the Board of Directors, provided by the Legal Representative, the Compliance Officer, and the Statutory Auditor.
- The documents that support the evolution of the Controls.
- The documents by means of which the authorities require information and their responses.
- The documentation related to the disciplinary processes carried out for non-compliance with the System.
- The plans, programs, and supporting material for training and outreach campaigns of the System.
- The Internal and External Reports of the System.
- All additional documentation that the System supports in some way.
- All reports shall be filed under the custody of the Compliance Officer or his or her delegate.

B. Procedures for carrying out Internal and External Reports

The steps to follow in order to carry out reports within the organization and to third parties are described below.

B.1 Internal Reports

Reports that must be executed only by an RA official to another RA official for internal purposes, which will deal with alerts of Unusual, Suspicious or Attempted Operations, or

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Risk Events to be evaluated through the Identification, Measurement and Treatment Procedure of ML/FT/FPWMD Risks for Mitigation.

B.2 External Reports

These are the reports provided to third parties outside of RA, including, but not limited to, Control Agencies. The following are examples of some External Reports:

- Reports to the UIAF of Suspicious Operations (ROS) or Absence of Suspicious Operations (AROS).
- Cash transaction reports.
- Other reports required by the competent authorities.


All Internal and External Reports must be documented. All reports shall be filed under the custody of the Compliance Officer or whoever he/she delegates for such purposes.

C. Training Program and Outreach Plan

C.1 Training Program

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

- System training must be carried out with a minimum frequency of one (1) time per year.
- Training must be provided in the induction processes of new Employees under the supervision of the Compliance Officer.
- The training material will be constantly reviewed and updated by the Compliance Officer or his or her delegate.
- Training must have mechanisms for evaluating the results obtained in order to determine its effectiveness and compliance with the proposed objectives.
- Disclose the Policies and procedures by delivering this physical and/or digital document in the corresponding induction processes.


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- The training will be given in person or virtually, supported by a presentation that describes its objectives, main elements, those responsible, forms, and procedures to follow.
- The Company entry training must have a format that is read and understood by the officials who receive it (Annex G).
- The training must be documented with attendance records that record its completion, the names of the attendees, the date and issues discussed during the training. (Annex I).

C.2 Outreach Plan

RA has a Outreach Plan that aims to keep all its Clients and Suppliers aware of the existence and updating of SAGRILIFT, the obligation to follow it, the sanctions for non-compliance, and the status of its compliance. This plan uses different strategies and media, namely:

- Have contractual clauses where the Counterparts express their reading, understanding and submission to the SAGRILIFT RA Policy.
- Training sessions that must be given in the induction processes of new contractors or clients.
- Disclose the Policies and procedures by delivering this physical and/or digital document in the corresponding induction processes.
- On at least an annual basis, make the obligation to comply with SAGRILIFT known, the sanctions for non-compliance and its implementation status. For these purposes, tools will be used such as mass emails, publications on information boards and on the internal RA website, videos projected at meetings, among others.


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VII. STAGE 6: FOLLOW-UP AND MONITORING

The last stage of the System refers to its follow-up and monitoring, with the purpose of addressing the evolution of the Risk Events treated, the effectiveness of the Treatment Plans designed, as well as the different strategies of the System overall. Likewise, it seeks to determine the required changes in Risk Events and their Controls. The results of the evaluation of the System must be presented semi-annually by the Compliance Officer to the Legal Representative and the Board of Directors.

In accordance with the above, RA defined the following follow-up and monitoring mechanisms:

- The main Monitoring Tool is the self-assessment of Risk Events and Controls in order to establish a critical approach that examines and evaluates the effectiveness of the System. Self-assessment must be considered by system users at least once a year.
- Once the implementation of the System has been completed, the Relevant Agents and officers directly involved in the treatment of ML/TF/FPWMD risks must review and evaluate it to verify the relevance and adequacy of the ML/TF/FPWMD risk management process, as well as the Controls implemented and correct any possible deficiencies detected. This is done by filling out the Self-Assessment Form (Annex F), in which the Employees make a self-criticism exercise regarding the way in which they have executed the provisions of this Manual.
- An analysis and investigation of the Internal Reports, complaints to the Ombudsman and Risk Events that are known to them will have to be carried out by the Compliance Officer.
- The Statutory Auditor and the Internal Audit Area must submit reports at the periodicity defined in this Manual, to make known from their point of view the status of implementation of SAGRILAFT.
- The Compliance Officer must carry out semiannual reviews of the Risk Matrix to determine its validity or if there are new risks to be included.


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VIII. SCOPE OF APPLICATION

The Corporate Policies were prepared by the Compliance Officer and presented jointly with the Legal Representative before the RA Board of Directors.

In the event that on December 31 of any year, the Company ceases to comply with the foreseen requirements to be an entity liable to have a SAGRILAFT, the Company must wait for such situation to continue for a minimum additional period of three (3) years to stop applying the System.

The Board of Directors proceeded to approve the SAGRILAFT in July 2023, so they are mandatory for all RA Employees, managers, auditors, and contractors.

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IX. ANNEXES

ANNEX A - ML/FT/FPWMD RISK MATRIX


For the execution of the Self-Monitoring Integrated Risk Management System for Money Laundering and Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction, the following Risk Events have been preliminarily and illustratively identified.

This Risk Events Matrix is intended to help RA officials identify those foreseeable Risk Events; However, it does not constitute an exhaustive list and, on the contrary, the identification of specific risks; Suspicious Operations; Attempted Operations; and Unusual Operations, must be carried out by the official in the development of his daily activities.


| ML/FT/FPWMD RISK MATRIX AND ITS CONTROLS | | |
|---|--|--|
| COUNTERPARTIES | | |
| EVENT | WARNING SIGNS | CONTROLS |
| Relationship with third parties whose activities are classified as High or Moderate Risk. | Having relationships with subjects that carry out activities classified as High or Moderate ML/FT/FPWMD Risk, according to the classification of the “Risk evaluation derived from the economic activity of the Counterparty” Matrix contained in Annex B. | Supplier Code of Conduct. Counterparty Knowledge Policy. Counterparty Declaration Form. Anti-Corruption Policy. Policy against the Financing of the Proliferation of Weapons of Mass Destruction |
| Payments made by Clients with resources from ML/FT/FPWMD activities. | Receive payments from Clients whose resources come from ML/FT/FPWMD activities. | Counterparty Knowledge Policy. Counterparty Declaration Form. Anti-Corruption Policy. Cash handling policy. |

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| Acquisition of goods or services financed by ML/FT/FPWMD activities. | Acquire goods or services from Suppliers or third parties whose businesses are supported by activities related to ML/FT/FPWMD. | Counterparty Knowledge Policy. Counterparty Declaration Form Policy against the Financing of the Proliferation of Weapons of Mass Destruction |
| Relationship with unidentified counterparties. | Conduct business with natural or legal persons that are not fully identified. | Counterparty Knowledge Policy. Counterparty Declaration. Anti-corruption policy. Policy against the Financing of the Proliferation of Weapons of Mass Destruction |
| Relationship with Counterparties whose final beneficiaries are involved in ML/FT/FPWMD activities. | Establish relationships with legal entities that are controlled by individuals or companies related to activities or with a history of ML/FT/FPWMD. | Counterparty Declaration. Consultation Policy on Restrictive Lists. |
| Linking of Employee related to ML/FT/FPWMD activities. | Hiring Employees with ML/FT/FPWMD judicial records, ongoing judicial proceedings for ML/FT/FPWMD activities or involved in such activities. | Employee Declaration. Code of Conduct. Anti-Corruption Policy. |
| Linking of Shareholders related to ML/FT/FPWMD activities. | Accepting new natural or legal persons as new Partners linked to activities related to ML/FT/FPWMD. | Counterparty Declaration. Anti-Corruption Policy. Business cooperation policy, acquisitions, mergers and virtual or non-face-to-face businesses. Policy against the Financing of the Proliferation of Weapons of Mass Destruction |
| Businesses with Counterparties included in Binding Lists | Commercial operations with the people or companies that appear on Binding Lists, as defined in Annex C. | Counterparty Declaration. Consultation Policy on Restrictive Lists. |
| Counterparties with relationships to third parties linked to ML/FT/FPWMD activities. | RA Providers may eventually maintain relationships with third parties that are involved in ML/FT/FPWMD activities. | Supplier Code of Conduct. Market Access Procedure. Policy against the Financing of the Proliferation of Weapons of |

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| | | Mass Destruction. |
| Presentation of illegible, damaged, or outdated information by the Counterparties. | Presenting documentation (i.e., import declarations, representation certificates, RUT, etc.) in poor condition or illegible. | Counterparty Declaration. Policy to support all operations, business deals, and contracts. |
| Supply of products or services at prices different from those of the market. | Counterparties that supply products (movable or immovable property) or services at prices considerably different from those of the market (i.e. artificially low or high). | Counterparty Declaration. Anti-corruption policy. Counterparty Knowledge Policy. |
| Payments from Counterparties in cash. | Making or receiving payments with a high volume of cash without apparent justification that jeopardizes the control and traceability of the origin of the resources. | Cash handling policy. |
| Cash deposit with unexplained sources | Cash deposits into personal or business bank accounts from unexplained sources. | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. Cash handling policy. |
| Banking operations with unjustified or erroneous documentation | Unjustified documentation that does not correspond to the origin or owner. | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. Cash handling policy. |
| Increase in unjustified cash sales. | Large increase in billing or cash sales from unidentifiable customers. | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. Cash handling policy. |
| Relationship with Counterparties whose owners or directors are involved in ML/FT/FPWMD activities | Contract with legal entities that have people involved in ML/FT/FPWMD activities as directors or owners. | Counterparty Declaration. Consultation Policy on Restrictive Lists. Supplier Code of Conduct. Market Access Procedure. Policy against the Financing of the Proliferation of Weapons of Mass Destruction. |
| | Contract with people who act on behalf of third parties whose identity is hidden or unknown. | Counterparty Knowledge Policy. |

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| Relationship with Counterparties that act on behalf of third parties. | | <p>Counterparty Declaration.</p> <p>Anti-corruption policy.</p> <p>Policy to support all operations, business deals, and contracts.</p> <p>Consultation Policy on Restrictive Lists.</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> |
| Counterparties splitting transactions | <p>Carrying out transactions with Counterparties that intend or actually divide operations that could be carried out in a single transaction.</p> <p>Payments of operations with resources derived from international transfers coming from several senders in favor of the same beneficiary, or from the same sender in favor of several recipients, without an apparent relationship.</p> | <p>Cash handling policy.</p> <p>Policy to support all operations, business deals, and contracts.</p> <p>Counterparty Declaration.</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> |
| Evasion of internal controls by counterparties | RA Counterparties attempt to persuade their employees not to implement internal controls and approvals, with a view to evading them. | <p>Counterparty Knowledge Policy.</p> <p>Counterparty Declaration.</p> <p>Anti-corruption policy</p> <p>Policy to support all operations, business deals, and contracts.</p> <p>Consultation Policy on Restrictive Lists.</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> |
| Evasion of internal controls by RA Employees | Having Employees who evade the internal controls and approvals established in the Corporate Policies. | <p>Counterparty Knowledge Policy.</p> <p>Counterparty Declaration.</p> <p>Anti-corruption policy.</p> <p>Policy to support all operations, business deals, and contracts.</p> |

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| | | <p>Consultation Policy on Restrictive Lists.</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> |
| RA employees with a suspicious socioeconomic level | Having Employees whose socio-economic development does not correspond to or is greater than the income level granted by the company. | <p>Counterparty Knowledge Policy.</p> <p>Counterparty Declaration.</p> <p>Anti-corruption policy</p> <p>Policy to support all operations, business deals, and contracts.</p> <p>Consultation Policy on Restrictive Lists</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> |
| Counterparties relationships with third parties linked to ML/FT/FPWMD activities. | RA Providers may eventually maintain relationships with third parties that are involved in ML/FT/FPWMD activities. | <p>Supplier Code of Conduct.</p> <p>Market Access Procedure.</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> |
| Relationship through non-formalized mechanisms | Relevant operations, business deals or contracts that are not recorded in writing. | <p>Policy to support all operations, business deals, and contracts.</p> <p>Document storage policy.</p> |
| Accepting partners without resource source verification | New associates who have been accepted or linked without previously verifying the origin of the resources and who are involved in ML/FT/FTPWMD activities. | <p>Counterparty Knowledge Policy.</p> <p>Counterparty Declaration.</p> |
| Relationship with PEPs and foreign PEPs | Operations in which any member of the Counterparty holds the status of PEP or Foreign PEP | <p>Counterparty Knowledge Policy.</p> <p>Counterparty Declaration.</p> |
| JURISDICTION | | |
| EVENT | WARNING SIGNS | CONTROLS |

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| Relationships with Counterparties whose operation is located in Jurisdictions classified as High or Moderate Risk | Relationships with Counterparties or third parties located in highly risky jurisdictions regarding ML/FT/FPWMD; High or moderate risk jurisdictions in accordance with the Jurisdiction Evaluation Matrix According to their ML/FT/FPWMD Risks (Annex B). | Cash handling policy. Counterparty Declaration. Supplier Code of Conduct. Market access procedure. |
| RA Relationships with Counterparties or third parties whose operation is related to third parties located in Jurisdictions classified as High or Moderate Risk. | Operations entered into with counterparties that are not necessarily located in ML/FT/FPWMD risky Jurisdictions, but that do have relationships with them through their supply chain or clients. | Cash handling policy. Counterparty Declaration. Supplier Code of Conduct. Policy against the Financing of the Proliferation of Weapons of Mass Destruction. |
| Relationship with suspicious donations or counterparty operations | Donations that do not have an Apparent Final Beneficiary, whose origin is unknown or who is domiciled in a high-risk jurisdiction. | Counterparty Declaration. Supplier Code of Conduct. Policy against the Financing of the Proliferation of Weapons of Mass Destruction. |
| Transactions entered into with Counterparties domiciled or operating in non-cooperative areas | Operations entered into with Counterparties located in geographic areas designated by the FATF as non-cooperative. | Counterparty Declaration. Binding List verification policy. |
| Cash operations with risk countries | Cash operations with countries with a high level of political instability corruption. | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. Cash handling policy. |
| Loan operations received in cash | Foreign loans received in cash and local currency | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. Cash handling policy. |
| PRODUCT | | |
| EVENT | WARNING SIGNS | CONTROLS |
| Marketing of products and services that are likely to be involved in ML/FT/FPWMD activities. | Products and/or services supplied by RA being used for ML/FT/FPWMD purposes. | Cash handling policy. Counterparty Declaration. Supplier Code of Conduct. Policy for entering new markets or launching new Products. Policy against the Financing of the Proliferation of Weapons of Mass Destruction. |

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| Operation of products that have not been duly nationalized. | Products acquired by the Company not complying with the legal requirements for nationalization. | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. |
| Operation with restricted sales products that do not have the proper authorizations or licenses. | Products acquired by the Company not meeting the legal requirements for compliance with licenses or authorizations from regulatory entities. | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. |
| DISTRIBUTION CHANNELS | | |
| EVENT | WARNING SIGNS | CONTROLS |
| Use of low-reputation distribution channels. | Hiring import, transport or customs agent companies that do not have local or global recognition and can easily be involved in ML/FT/FPWMD activities, as well as other criminal offenses such as smuggling, drug trafficking and substance trafficking for the processing of narcotics. | Market Access Procedure. Supplier Code of Conduct. Counterparty Declaration. Policy against the Financing of the Proliferation of Weapons of Mass Destruction. |
| Use of distribution channels previously immersed in ML/FT/FPWMD activities | Hiring import, transportation, or customs agencies, with a history of ML/FT/FPWMD activities, as well as other criminal types such as smuggling, drug trafficking and trafficking of substances for the processing of narcotics. | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. |
| Presence of LA/FT/FPADM in the product import process. | Presence of technical contraband, money laundering, drug trafficking, terrorism, financing of terrorism and arms trafficking, in the nationalization of products by customs agents, transfer by the transporter, and storage by the warehouse. | Market access procedure. Policy against the Financing of the Proliferation of Weapons of Mass Destruction. |
| Operations involving hidden transportation of cash | Operations involving hidden transportation of cash | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. Cash handling policy. |
| Excessive and unjustified transportation costs | Transportation with high costs compared to alternative transportation methods | Supplier Code of Conduct. Counterparty Declaration. Counterparty Knowledge Policy. Market access procedure. Cash handling policy. |
| ACTIVITY | | |
| EVENT | WARNING SIGNS | CONTROLS |
| Use of the company's processes and products for ML/FT/FPWMD | Use of industrial automation processes, or software development by the Company, within criminal organizations that develop ML/FT/FPWMD activities. | Counterparty Knowledge Policy. Counterparty Declaration. |

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| | | <p>Anti-corruption policy.</p> <p>Policy to support all operations, business deals, and contracts.</p> <p>Consultation Policy on Restrictive Lists.</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> |
| Operation of products coming from illegal activities. | Activity related to operations with products coming from illegal activities, including, among others, smuggling. | <p>Counterparty Knowledge Policy.</p> <p>Counterparty Declaration.</p> <p>Anti-corruption policy</p> <p>Policy to support all operations, business deals, and contracts.</p> <p>Consultation Policy on Restrictive Lists.</p> <p>Policy against the Financing of the Proliferation of Weapons of Mass Destruction.</p> <p>Ethics and business practices policy.</p> |
| Unexpected Invoicing or cash sales in the economic sector. | Unexpected invoicing or cash sales in the economic sector. | <p>Supplier Code of Conduct.</p> <p>Counterparty Declaration.</p> <p>Counterparty Knowledge Policy.</p> <p>Market access procedure.</p> <p>Cash handling policy.</p> |
| Inconsistent Carrier circumstances with Quantity, value, or currency. | Quantity, value or currency not consistent with the circumstances of the carrier | <p>Supplier Code of Conduct.</p> <p>Counterparty Declaration.</p> <p>Counterparty Knowledge Policy.</p> <p>Market access procedure.</p> <p>Cash handling policy.</p> |
| Operations with companies that operate or develop activities with Virtual Assets | Any operation that links a company that develops activities with Virtual Assets, on the Counterparties, the Virtual Assets, and their intermediaries | <p>Supplier Code of Conduct.</p> <p>Counterparty Declaration.</p> <p>Counterparty Knowledge Policy.</p> <p>Market access procedure.</p> |

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ANNEX B – PARAMETERS FOR THE IDENTIFICATION OF RISK EVENTS

This document will serve as a guide so that RA Employees have additional Tools for the identification of Risk Events that have not been provided for in the Risk Matrix (Annex A). Specifically, it provides tools to identify Risk Events derived from Jurisdiction and Counterparty Risk Factors.

A. RISK IDENTIFICATION ARISING FROM JURISDICTION

Territorial Jurisdiction: Refers to the geographical location of the Counterparty's operations (local, regional, national, foreign). This variable is relevant for the purposes of establishing the ML/FT/FPWMD Risk associated with geographical areas that historically present significant rates of this type of crime, classified as risky by national and international organizations or that do not have sufficient controls for the prevention of this type of illegal activities.

Considering that the operations centers of the RA Counterparts are located in different areas of the country and abroad, the risk areas were classified according to the following sources of information:


- **At the national level:** The statistical calculation of the database of names, sanctions and news carried out by INFOLAFT⁵ was used in order to identify the most recurrent crimes in the areas of the country with the highest risk of ML/FT/FPWMD. Border or free trade zones were also defined as a factor to be taken into account because they are susceptible to the smuggling of illicit money or weapons. In addition, human trafficking or sexual exploitation was included as a criterion to be taken into account, as it is likely to be related to illicit entries of persons dedicated to terrorism, due to the lack of border controls.
- **On an international level:** The list of non-cooperative and high-risk countries published by the intergovernmental standard-setting body on ML/TF/FPWMD, the Financial Action Task Force - FAFT⁶, was used to classify countries with the highest risk of ML/TF/FPWMD activities. Likewise, for the classification of Moderate-risk countries, the list of countries that maintain their commitment to cooperation, but still have regulatory and legislative deficiencies in this area was used⁷.

The following table shows the classification of national and international Jurisdictions, defining different types of risk areas for ML/FT/FPWMD activities. This also includes the list of countries declared as tax havens by the Colombian authorities.

⁵ <https://www.infolaft.com/los-departamentos-de-colombia-con-mas-capturas-e-investigaciones-por-lavado-de-activos/>

⁶ The list is updated periodically and can be consulted at <http://www.fatf-gafi.org/countries/#high-risk>


⁷ The list is updated periodically and can be consulted at <https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/increased-monitoring-february-2021.html>

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| EVALUATION OF JURISDICTIONS ACCORDING TO THEIR RISKS ML/FT/FPWMD | | | | | |
|---|---|--|--|---|--------------------------------------|
| Minor Risk - Green Zone | | Moderate Risk - Yellow Zone | | High Risk - Red Zone | |
| National jurisdictions | Foreign Jurisdictions | National jurisdictions | Foreign Jurisdictions | National jurisdictions | Foreign Jurisdictions |
| Evaluate according to the “Evaluation of National Jurisdictions” table Results between 0% and 14%. | Countries not included in the following categories. | Evaluate according to the “Evaluation of National Jurisdictions” table Results between 15% and 35%. | Albania Barbados Botswana Burkina Faso Cambodia Cayman Islands Ghana Jamaica Mauritius Morocco Myanmar Nicaragua Pakistan Panama Senegal Syria Uganda Yemen Zimbabwe | Evaluate according to the “Evaluation of National Jurisdictions” table Results between 35% and 100%. | Iran Democratic Republic of Korea |

The following is the methodological table to evaluate a national Jurisdiction on matters of ML/FT/FPWMD. To use the table: (i) identify the Jurisdiction to be evaluated; (ii) verify if any of the “conditions” described are met for the selected Jurisdiction; (iii) if the conditions are met, add the corresponding percentage according to the table to the result; (iv) add the total percentage obtained; and (v) compare the result obtained with the parameters established in the “Evaluation of Jurisdictions according to their ML/FT/FPWMD Risks” matrix that precedes this one.

| Evaluation of National Jurisdictions | | |
|--|--------------------------------|------------------|
| Condition | Compliant/Not Compliant | Relevance |
| <ul style="list-style-type: none"> • Presence of illegal groups. • Drug trafficking. • Presence of radicals or terrorists. • Illicit crops. • Illegal minery. | YES ____ NO ____ | 50% |
| <ul style="list-style-type: none"> • Commercial exchange zone. • Border zone or Free Zone. | YES ____ NO ____ | 35% |
| <ul style="list-style-type: none"> • Human trafficking or sexual exploitation. | YES ____ NO ____ | 15% |
| Total result | | 100% |

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B. IDENTIFICATION OF RISKS DERIVED FROM COUNTERPARTY ACTIVITY


The type of economic activity carried out by the Counterparty is a very important factor in the evaluation of its risk profile. Certain activities are riskier in terms of ML/FT/FPWMD because they handle large sums of cash, have fewer regulatory controls or due to their nature they make it easier to achieve the purpose of criminals, among others.

For the classification of economic activities by risk level, those defined in the “ML/FT/FPWMD Risk Management Model in the Real Sector” were taken as a basis, created under the “Responsible and Safe Businesses” program.⁸, led by the United Nations Office on Drugs and Crime (UNODC), the Bogotá Chamber of Commerce and the British Embassy. Likewise, the “National Assessment of the Risk of Money Laundering and Terrorist Financing” was used, prepared in 2016 jointly by the Ministry of Justice, the UIAF and the Universidad del Rosario⁹.

| Evaluation of risks derived from the economic activity of the Counterparty | | |
|--|--|--|
| Minor Risk - Green Zone | Moderate Risk - Yellow Zone | High Risk - Red Zone |
| Activities not included in the following two categories. | <ul style="list-style-type: none"> Hotels and travel agencies. Marketers/leasers of motor vehicles, boats, and aircraft. Construction companies. Real estate marketers or agencies. Gas stations. Companies located in free zones. Companies in the health sector. Companies dedicated to football and other sports. Other companies in the real sector. Security companies. Postal operators. Notaries. | <ul style="list-style-type: none"> Companies or people that market products controlled by the National Narcotics Directorate. Currency Exchange professionals and businesses. Pawn shops. Casinos and betting businesses. Marketers under the multi-level or pyramid sales scheme. Marketers of weapons, explosives, or ammunition. Sports entities. Marketers of antiques, jewelry, precious metals and stones, coins, art objects and postage stamps. Lenders. Transport sector. Transporters of money or values. Companies dedicated to the transfer or sending of funds or remittances. Border exchange operators. Companies or people that provide accounting and tax auditing services. Companies or people that provide services as lawyers. Non-profit entities. Companies dedicated to mining. |

⁸ https://www.supersociedades.gov.co/delegatura_acc/informes_publicaciones/lavado_activos/Documents/1%20modelo%20nrs%20-%20general.pdf

⁹ <http://www.urosario.edu.co/observatorio-de-lavado-de-trabajos/imagenes/Resumen-Executivo-Informe-Final-ENR-2016-VFinal.pdf>

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ANNEX C - SAGRILIFT CORPORATE POLICIES FOR THE PREVENTION OF ML/FT/FPWMD RISK

The Policies that make up SAGRILIFT are described in detail below.

A. General Policies of SAGRILIFT

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

- Ensure the execution and compliance of the regulations related to this Manual.
- Ensure an efficient implementation of the internal control activities incorporated into the processes for which they are responsible.
- Have updated Counterparty databases, clarifying that they must have the needed authorization for the processing of said data.
- Ensure that the information contained in the Company's databases is complete, updated, and consistent with the documentary supports.

A.1. Binding List Query Policy

RA will carry out consultations and cross-check information from the Counterparties with the following Restrictive Lists:

- United Nations Security Council restrictive lists¹⁰;
- OFAC List or Clinton List¹¹;
- INTERPOL List¹²;
- List of judicial records of the National Police¹³;
- Lists of terrorists of the United States of America¹⁴;


¹⁰ <https://www.un.org/securitycouncil/es/content/un-sc-consolidated-list>

¹¹ <https://web.bascbogota.com/node/47>

¹² <https://www.interpol.int/es/notice/search/wanted>

¹³ <https://antecedentes.policia.gov.co:7005/WebJudicial/>

¹⁴ <https://www.state.gov/foreign-terrorist-organizations/>

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- European Union list of persons, groups and entities involved in terrorist acts and subject to restrictive measures¹⁵;
- Most Wanted – FBI¹⁶
- DEA¹⁷
- Comptroller General of the Republic¹⁸.
- Attorney General's Office¹⁹.
- United Nations Security Council
- Attorney General's Office Background list
- List of Fictitious DIAN Suppliers
- National Police Background List
- Consultation of Judicial Branch Proceedings with Convictions and in progress.
- World Bank Sanctions Lists
- IDB Sanctions List
- Any other list indicated by the Superintendency of Companies (see https://www.supersociedades.gov.co/delegatura_aec/Paginas/multimedia-LAFT.aspx#listas_vinculantes).

These consultations must be carried out for all Counterparties and prior to their involvement. However, the information of the Counterparties on Restrictive Lists will also be verified each time renewals or extensions are carried out in the contractual relations with them.

Likewise, if a specific Risk Event is classified as Extreme and High Risk, the consultation on the Counterparty must be repeated on a bimonthly basis. If it is Low Risk, every three months, and if it is Moderate Risk, every 6 months. Or as defined in the specific Treatment Plan for the specific Risk Event.


¹⁵ <https://www.consilium.europa.eu/en/policies/fight-against-terrorism/terrorist-list/>

¹⁶ <https://www.fbi.gov/wanted/topten>

¹⁷ <https://www.dea.gov/es/node/11281>

¹⁸ <https://www.contraloria.gov.co/control-fiscal/responsibilidad-fiscal/certificado-de-antecedentes-fiscales>

¹⁹ <https://www.procuraduria.gov.co/portal/Certificado-de-Antecedentes.page>

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Regarding RA Employees and contractors, the verification will be done annually. Counterparties that have PEPs within their organization or that are established in tax havens (as defined by law) will be verified every 6 months.

Verifications on Restrictive Lists will be made on the company 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 participation equal to or greater than 5% of the share capital. In the case of natural persons, it will be done with their name and identification document number.

RA must have visibility 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 shareholding. For this purpose, in the forms that the Counterparties are asked to sign, it will be requested to indicate the shareholding.


The Company shall refrain from linking Counterparties that are reported in these lists, or are linked to a criminal investigation with indictment, or reported by supervisory agencies such as the Superintendency of Finance of Colombia, the Superintendency of Companies, among other entities, as well as the UIAF, for activities that can be classified as ML/FT/FPWMD.

No official may authorize any operation, service, support, or conclusion of contracts of any kind with those who appear on the Restrictive Lists, under penalty of being subject to sanctions that could result in their justified dismissal. Unless an exception is established with authorization from the hierarchical superior and validation from the Compliance Officer.

A.2 Knowledge and linkage policy for Suppliers, Clients, and Employees

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 SAGRILIFT and other rules defined for such purpose. For these purposes, at the time of entering a contractual relationship with any Counterparty, the Employee Declaration Form (Annex H) or the Counterparty Declaration Form (Annex I) must be signed, and document the Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation procedure (Annex D) if applicable.

Additionally, it must provide processes that allow for an effective, efficient, and timely knowledge of current and potential Counterparties. Specifically, those processes that, through Due Diligence, allow 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 supports.

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To link Counterparties, the Counterparty Declaration Form must be completed and signed. This is intended for the third parties themselves to certify what activity they engage in and whether it presents a ML/FT/FPWMD risk, whether they have a SAGRILIFT, the origin of their funds, the Jurisdictions in which they operate and who their Final Beneficiaries are in order to have sufficient knowledge about them. For the development of the Due Diligence process by RA, the activities described in this Manual will be carried out.

Exceptionally, in cases of manifest urgency and at the request of the director of the area in charge of contracting and with the authorization of the Compliance Officer by filling out the Expedited Contracting Request (Annex K), expedited contracting processes may be carried out in which the Due Diligence procedure has not been previously processed.

In these cases, the Company shall ensure that the area in charge of the expedited contracting process provides the required documentary supports so that the Due Diligence process can be carried out no later than one (1) month after the authorization of the Compliance Officer has been issued. When, despite having initiated the business relationship, the Due Diligence cannot be completed within the aforementioned term, the contractual relationship must be terminated, and the Compliance Officer must be informed of the impossibility so that he/she may evaluate the pertinence of reporting the operation to the competent authorities.


Due Diligence and knowledge of the Counterparty is a process of continuous monitoring, for this reason, the Company must have databases or mechanisms that allow consolidating and identifying present or future warning signs. Therefore, the Due Diligence procedure must be carried out with a minimum periodicity and regularity, once every two (2) years or whenever it is considered pertinent 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 linking.

Additionally, the Company must apply an Intensified Due Diligence procedure in the cases indicated in this Manual.

A.3 Business cooperation policy, acquisitions, mergers, and virtual or non-face-to-face businesses

Prior to carrying out business cooperation business deals (*i.e. consortia, temporary unions, or joint ventures*) or acquisitions and mergers of RA with other companies, a due diligence process must be carried out to achieve adequate knowledge of the third parties with which that this type of business is going to be carried out.

This Restrictive Lists verification process includes verification of the company name and of the Counterparty's TIN, that of 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 to identify the natural or legal person with whom the business will be carried out and the origin of the resources that are part of the transaction.

A.4 Policy for entering new markets or launching new Products

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

To this end, the leaders of each area must carry out an evaluation of the ML/FT/FPWMD risk associated with these new operations, designing the controls for their mitigation, and recording this analysis to decide on their viability, as well as the convenience of these operations for RA.


A.5 Policy on knowledge and involvement of Politically Exposed Persons

Business deals 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 condition in the respective 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 disconnected from it for more than 3 years, in order to be able to develop the commercial activity with RA.

For the purposes of identifying the PEP status of a Counterparty, RA considers as such Counterparties who 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, General Accountant of the Nation.
- Senators and Representatives of the Congress of the Republic.
- Directors of Public Entities.
- Mayors of relevant municipalities (that comprise 0.2% of the country's total population).
- Top leaders of the political parties.

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- Candidates for the Presidency of the Republic.
- Notaries of capital cities.
- Superintendents or directors of State agencies.

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 of PEP will disappear after at least three years have elapsed since the cessation of the exercise of the functions that grant this status.

In the event that the Counterparty responds affirmatively regarding its status as a PEP or RA detects such a condition during the linking process, the contracting must be approved by the competent authority, in accordance with the terms of the Identification, Measurement and Treatment Procedure of ML/FT/FPWMD Risks for Mitigation (Annex D). Counterparties identified as PEP must be marked in the system with this condition and there will be a database for this purpose.

A.6 Policy for updating Counterparty information

As part of the Due Diligence in the knowledge of the Counterparties, RA has the obligation to carry out update processes annually, provided a lesser periodicity is not defined in other provisions.


A.7 Cash handling 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

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or a purchase order issued for; as well as those that have not undergone the Procedure for Identification, Measurement and Treatment of ML/FT/FPWMD Risks for Mitigation (Annex D).

A.8 Document Retention Policies

Support for Suspicious or Attempted Operations reported to the UIAF, as well as ROSs, information from transaction records and documents known to the Counterparties, among others, must be kept for at least ten (10) years.

To destroy these documents or send them to the dead file, the express written authorization of the Compliance Officer is needed.

A.9 Policy to support all operations, business deals, and contracts

All activities, business deals and contracts carried out by RA with its Counterparts must have the respective documentary support. RA will tend to include in its contracts clauses that prevent ML/FT/FPWMD, statements on the origin of funds and powers for RA that allow it to terminate the relationship at any time in the event of evidence of ML/FT/FPWMD practices with compensation for the damages caused by the materialization of the ML/FT/FPWMD Risks.

Any document that certifies these activities, in addition to constituting the support of the negotiation and the accounting record, serves as evidentiary support for any investigation that the competent authorities may carry out.


The Finance Department will verify that the accusation of all accounts payable is supported by an invoice or equivalent document and its annexes. Goods or services received that do not have valid support will not be authorized for payment until the aforementioned support is received.

A.10 Policy on information requirements by competent authorities

RA will attend, through the Compliance Officer, to the delivery of information and explanations requested by the competent authorities in matters of ML/FT/FPWMD.

A.11 SAGRILAFT Behavior Policy

RA officials will carry out 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 is to 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 ML/FT/FPWMD Risks.

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It is the duty of RA, its shareholders, the Board of Directors, its Compliance Officer, and other officials to ensure compliance with the regulations aimed at preventing and controlling the Risk of ML/FT/FPWMD, particularly those contained in the current legal provisions. The above, with the purpose not only of contributing to the achievement of the State's purposes and complying with the law, but also of protecting the national and international image and reputation of RA.

In reference to ML/FT/FPWMD, all Employees must be governed by the following principles:

- Know and act in accordance with what is indicated here.
- Report to the Compliance Officer any fact or Attempted, Suspicious or Unusual Operation that makes you suspect that an attempt to deploy ML/FT/FPWMD activities may occur.
- Prioritize with the regulations regarding the prevention of ML/FT/FPWMD before achieving commercial goals or the costs of acquiring products and services.
- Refrain from informing Counterparties, who have carried out or attempt to carry out Suspicious or Attempted Operations, that information about them has been reported to the UIAF. Likewise, RA must maintain confidentiality regarding this information and/or documentation.

For his/her part, the Compliance Officer must provide all necessary support to officials who find themselves facing a situation of conflict of interest or risk of participating in ML/FT/FPWMD conduct.


A.12 SAGRILAFT Training Policy

RA must design, schedule and coordinate SAGRILAFT training plans, aimed primarily at the entire organization as it is the first time it is implemented. These trainings must be provided by the Compliance Officer or whoever is delegated for these purposes.

Likewise, new Employees and third parties (not employees of the Company or contractors) must be trained during the induction process when appropriate. As well as the Suppliers if deemed relevant. Training programs, in addition to inductions, must be defined to be taught at least annually and a record of this must be kept, indicating the date and name of the attendees. Finally, after the training has taken place, the attendees will be evaluated on the transferred knowledge which will be documented, and if not, they will receive a grade.

A.13 Sanctions Policies

Failure to comply or violate SAGRILAFT policies and regulations constitutes serious misconduct. Consequently, and in cases where applicable, the provisions of the Code of

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Ethics will be applied, as well as the procedures and sanctions established by the Internal Work Regulations.

During the training and dissemination sessions, the sanctions that will result from not complying with the System Policies and related regulations will be announced.

It is the responsibility of RA to verify that officials fully comply with the instructions given and that any information related to ML/FT/FPWMD is immediately brought to the attention of the Compliance Officer.

A.14 Policy against the Financing of the Proliferation of Weapons of Mass Destruction – FPADM

RA is committed to the fight against the Financing of the Proliferation of Weapons of Mass Destruction, and in this sense (i) will strictly comply with the provisions of the SAGRILAF, (ii) will proactively address all requirements presented by the control entities, (iii) will make all reports of suspicious or attempted operations of which it has knowledge to the corresponding authorities, (iv) will attend to the observations regarding the procedures and tools issued by the different control entities, and (v) will evaluate the sources of ML/FT/FPWMD risk to which it is subject in the course of its business on a recurring basis.

B. Global RA Policies

RA has a series of global policies that cover all its Employees and extend to the third parties with whom they interact. Some have provisions that can complement the processes carried out within the framework of SAGRILAF, which is why they are relevant and must be adopted by Company officials.


B.1 Global Anti-Corruption Policy

Its objective is to prevent acts of corruption in any of the companies of the business 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 controls and sanctions for non-compliance.

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

However, its most important characteristics are highlighted in relation to SAGRILAF, namely:

- It must be applied by all RA Employees, distributors, and sales representatives, as well as Suppliers.

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- Employees responsible for relations with Suppliers are required to establish a selection process to determine that they do business in an ethical manner, and that they understand and apply this policy.
- A risk-based approach is determined according to the characteristics of the third party, with a Due Diligence process, prior to starting a commercial relationship.
- Disciplinary consequences and dismissal are established for non-compliance with what is provided therein.
- It is prohibited to receive or give gifts and hospitality of more than USD\$100, with prior approval from the hierarchical superior.
- Giving gifts or cash to public officials is prohibited.
- 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 purchase department must invite an RA lawyer to participate before signing a letter of intent with the Supplier. The lawyer must carry out a Due Diligence process and analyze the risk together with the Employee.

B.2 Market Access Procedure


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

The complete Procedure can be found on the RA web portal at the link [https://rockwellautomation.sharepoint.com/sites/OGC/Compliance/SitePages/Welcome.asx](https://rockwellautomation.sharepoint.com/sites/OGC/Compliance/SitePages/Welcome.asx?source=webpart) and/or https://www.rockwellautomation.com/en_US/about-us/overview.page?pagetitle=Ethics-and-Compliance&docid=1f0a48bdf3e14c4e23dcd06d8670319.

However, its most important characteristics are highlighted in relation to SAGRILIFT, namely:

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- It must be followed by the legal, marketing, technology, human resources, engineering, and finance departments (hereinafter, the "Function"), as well as by the sales and marketing teams composed of intermediaries, sales agents, or distributors (hereinafter, "GSM").
- Whenever acting through GSM, Due Diligence, training processes, prior approval for hiring and documentation of this Procedure must be ensured. Its compliance by the Employees will oversee the Channel Manager with support from an internal RA lawyer.
- The aforementioned prior approval must be submitted by the Channel Manager to his or her superior and must contain at least: (i) support of the Due Diligence process carried out and (ii) a 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 analyzing the level of proximity of the intermediary to RA and the corruption index of the country where it carries out its activity. It must be carried out every year or before establishing new business relationships.
- Levels of the Due Diligence process:
 - Level 1: executed autonomously by the Employee.
 - Level 2: executed by the Employee with the participation of the intermediary who must clarify and provide more information.
 - Level 3: executed by the Employee with the participation of a private investigator who certifies the veracity of the information.
- Prior to signing the contract, the Channel Manager must go visit the third party's facilities in person.
- An anti-corruption training session and signing of an anti-corruption commitment must be held every 2 years.
- The legal area keeps a file of original contracts, Due Diligence forms, periodic evaluations, training records and written commitments for 10 years.

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- There is a special and more rigorous Due Diligence procedure that must be followed with intermediaries in charge of processing and obtaining permits²⁰ from public entities or agents of the State, which states that:
 - A database search must be performed exclusively by the Legal area.
 - The Channel Manager must, in addition to the visit the third party's facilities, engage in a discussion on business ethics with the Supplier.
 - Written commitment to compliance with RA policies must be obtained.

B.3 RA Code of Conduct

Its objective is to compel all RA Employees to achieve their goals by conducting business in accordance with all applicable laws and the highest standards of business conduct.

The complete Code can be found on the RA web portal at the link, https://rockwellautomation.sharepoint.com/:b:/r/sites/SISTEMAINTEGRADODEGESTIN/S_hared%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 characteristics in relation to SAGRILIFT are:


- Code training must be provided to new Employees once they join and to former Employees annually.
- RA has its own body called the Board of Directors in charge of enforcing the Code and making decisions regarding non-compliance.
- If an Employee is aware of a conduct that goes against the Code, they must notify their superior, the Human Resources area, the Legal area, or through the Ombudsman channel.

B.4 Supplier Code of Conduct

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

The complete Code can be found on the RA web portal at the link, <https://rockwellautomation.sharepoint.com/sites/OGC/Compliance/SitePages/Welcome.as>


²⁰ Obtaining Visas, certificates of compliance with labor obligations, accounting or tax services, procedures before the commercial registry, acquisition of real estate, among others.

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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 SAGRILIFT, are:

- The Supplier must agree that it will follow this Code of Conduct and that of the Company in writing.
- In addition to extending the obligations of the general Code of Conduct, it establishes the obligation to comply with the US standard identified as “Customs trade partnership against terrorism (C-TPAT)”.

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ANNEX D – 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.):

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g. Follow-up Frequency:


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

Reporting Party’s Signature:

Name:
Position:
Identification card No.:

Compliance Officer’s Signature:

Name:
Position:
Identification card No.:

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ANNEX E - FORM FOR REPORTING UNUSUAL, ATTEMPT OR SUSPICIOUS OPERATIONS

RISK EVENT REPORTING FORM

Please report if during the month of (-) of 202(-), you have witnessed or known about 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 any risk event, please reply to the following questions:

1. Check the situation to be reported.

Select only one option

- ☐ Unusual operation
☐ Attempted Operation
☐ Suspicious Operation

2. Type of risk


Select all appropriate options

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

3. Date when you believe the risk event took place/will take place:


4. Name and position of people involved:

5. Describe the events you consider as relevant:

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6. Describe the evidence you consider relevant:

7. Attach the evidence you have in relation to the ones described in the previous question. (Files sent)

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ANNEX F - SYSTEM SELF-ASSESTMENT FORM

Name: _____
 Department: _____
 Position: _____

1. I am aware of the existence of the Self-Control Comprehensive Risk Management System for Money Laundering and Financing of Terrorism ("SAGRILIFT") and the Transparency and Business Ethics Program ("TBEP").

Yes ____ . No ____

2. I consider that the training given on the SAGRILIFT and the TBEP were (mark with an X):

Excellent: ____ Good: ____ Acceptable: ____ Poor: ____

3. I consider that the SAGRILIFT and TBEP Programs have been effectively disclosed within the Company

Yes ____ No ____

4. I consider that my performance regarding fulfilling the functions required of me by SAGRILIFT and TBEP was (mark with an X):

Excellent: ____ Good: ____ Acceptable: ____ Poor: ____

5. I know the SAGRILIFT and TBEP reporting channels; namely: (i) physical mailbox, (ii) Online Risk Event Report, (iii) Ombudsman complaint channel, and (iv) Compliance Officer's email.


Yes ____ . No ____

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

Yes ____ . No ____

7. I consider that the complaint and reporting channels enabled were:

Excellent: ____ Good: ____ Acceptable: ____ Poor: ____

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ANNEX G - SOLE EMPLOYEE DECLARATION FORM - FO-HR-011

I declare to ROCKWELL AUTOMATION COLOMBIA S.A.:

That I know, have read, and understand its Transparency and Business Ethics Program ("TBEP") and its Self-Monitoring Integrated Risk Management System for 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 their provisions.

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

That I have no relationship with any Corruption, Transnational Bribery ("C/TB"), Money Laundering, Financing of Terrorism or Financing of the Proliferation of Weapons of Mass Destruction ("ML/FT/FPWMD") activities, nor am I under investigation or have a judicial conviction against myself nor my relatives up to the third degree for the exercise of illicit activities.

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

Employee's signature:


Name:

Identification Card No.:

Date: ____/____/____

Position: _____

Area: _____

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ANNEX H - SOLE COUNTERPARTY DECLARATION FORM - FO-SIG-013

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

FORMULARIO ÚNICO DE DECLARACIÓN DE CONTRAPARTES / SOLE COUNTERPARTY DECLARATION FORM

Para mayor información del alcance de los sistemas SAGRILAF 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 SAGRILAF 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 | | Constructoras / Construction companies | |
| Profesionales y casas de cambio / Professionals and exchange houses | | Notarios / Notaries | |
| Casas de empeño / Pawnshops | | Estaciones de gasolina / Gasoline stations | |
| Casinos y negocios de apuestas / Casinos and gambling businesses | | Empresas ubicadas en zonas francas/ Companies located in free trade zones | |
| Comercializar armas, explosivos o municiones / Commercialization of arms, explosives or ammunition | | Empresas del sector salud / Health sector | |
| Entidades deportivas / Sports entities | | Empresas dedicadas al fútbol y otros deportes / Companies dedicated to soccer and other sports | |
| Prestamistas / Lenders | | Empresas de seguridad / Security companies | |
| Actividad en el sector transportador / Activities in the transport sector | | Operadores postales / Postal operators | |
| Transportadores de dinero o de valores / Money or value transporters | | Comercializadoras o agencias de bienes raíces / Real estate agencies or traders | |
| Operadores cambiarios fronterizos / Border exchange operators | | Empresas dedicadas a la transferencia o envío de fondos o remesas / Companies engaged in the transfer or remittance of funds or remittances | |
| Prestar servicios de contaduría y revisoría fiscal / Providing accounting and auditing services | | Comercializadoras/arrendadoras de vehículos automotores, embarcaciones y aeronaves / Motor vehicles, boats and aircrafts traders/lessors | |
| Prestar servicios como abogados / Providing services as attorneys at law | | Comercializadoras/arrendadoras de vehículos automotores, embarcaciones y aeronaves / Commercialization/leasing of motor vehicles, boats and aircrafts | |
| Actividad dedicada a la minería / Activity dedicated to mining | | 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 | |
| Hoteles y agencias de viaje / Hotels and travel agencies | | Comercializar productos controlados por la Dirección Nacional de Estupeficientes / Commercialization of products controlled by the National Narcotics Directorate | |

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, Mali, 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.

| | |
|----------|----------|
| Si / Yes | No / Not |
| | |

Si marcó "SI" 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:

1. 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

2. Ejercen control sobre la persona jurídica por cualquier medio, o

3. 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

4. Si la compañía es una estructura sin Personalidad 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:

1. 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.

2. Exercise control over the legal person by any means, or

3. 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

4. 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 identidad / ID Date of issuance | Porcentaje de participación / Percentage of participation | Cargo y razón de control / Position and reason for control |
|---------------|--|---|---|--|
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Los representantes legales, miembros de Junta Directiva, Revisores Fiscales o Beneficiarios Finales, son Personas Expuestas 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 (“SAGRILAF”), o un Programa de Transparencia y Ética Empresarial (“PTEE”).

Tenga en cuenta las siguientes definiciones:

LAFT/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 (“SAGRILAF”), or a Transparency and Business Ethics Program (“PTEE”).

Please note the following definitions:

LAFT/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 SAGRILAF / The company is required to have a SAGRILAF | | |
| 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 LAFT/FPADM y C/ST / The company complies with Colombian regulations related to AMU/CFT/FPADM and C/ST prevention. | | |
| La compañía cuenta con manuales y procedimientos de prevención, control y administración del riesgo de LAFT/FPADM y C/ST, ajustados a las regulaciones vigentes / The company has manuals and procedures for the prevention, control and management of ML/FT/FPADM 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 SAGRILAF y el PTEE de ROCKWELL AUTOMATION COLOMBIA S.A., y me comprometo expresamente a cumplirlos / I know and understand the SAGRILAF 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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|--|--|-----------------------|-----------------|
|  | INTEGRATED MANAGEMENT SYSTEM | | |
| | SELF-MONITORING INTEGRATED RISK MANAGEMENT SYSTEM FOR MONEY LAUNDERING, FINANCING OF TERRORISM, AND FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION MANUAL (“SAGRILAF”) OF ROCKWELL AUTOMATION COLOMBIA S.A. | | |
| Code: ML-SIG-002 | Version: 5 | Pass Date: 09/17/2024 | Department: CMS |

| |
|--|
| 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 SAGRILAF, y se encuentran debidamente capacitados / The company's employees and contractors have been informed about the contents of the PTEE and SAGRILAF, 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 LAFT/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 LAFT/FPADM. / The company has not been involved in investigations for violation of laws related to C/ST or LAFT/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 LAFT/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 |
| | | |
| Cargo / Position | Fecha / Date | Firma / Signature |
| | | |

| | | | |
|--|---|-----------------------|-----------------|
|  | INTEGRATED MANAGEMENT SYSTEM | | |
| | SELF-MONITORING INTEGRATED RISK MANAGEMENT SYSTEM FOR MONEY LAUNDERING, FINANCING OF TERRORISM, AND FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION MANUAL ("SAGRILIFT") OF ROCKWELL AUTOMATION COLOMBIA S.A. | | |
| Code: ML-SIG-002 | Version: 5 | Pass Date: 09/17/2024 | Department: CMS |

ANNEX I – SAGRILIFT ANNUAL TRAINING CERTIFICATION ACT

Bogotá D.C., [--] [--], 20[--]

Rockwell Automation Colombia S.A.

City

Ref.: Annual training attendance record for 202[--].

[--] identified with Citizenship Card No. [--], as Human Resources Business Partner of Rockwell Automation Colombia S.A., identified with TIN 830.018.146-7; I hereby certify the attendance of the company's employees to the annual SAGRILIFT training held on [--], [--], 2021, which was attended by the employees, as certified in annex one (01) of these minutes.

During the training, the following topics related to SAGRILIFT were presented:

- Definition
- Legal framework
- Background
- Structure
- Diagnosis
- Relevant agents
- Compliance officer
- Types of ML/FT/FPWMD risks
- Identification, measurement and treatment of risks
- Obligations


In addition, employees were given the coordinates to identify the SAGRILIFT manual and the points of contact in case of doubts or concerns.

Sincerely,

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

Annex:

- Minutes with a list of attendees.

| | | | |
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|  | INTEGRATED MANAGEMENT SYSTEM | | |
| | SELF-MONITORING INTEGRATED RISK MANAGEMENT SYSTEM FOR MONEY LAUNDERING, FINANCING OF TERRORISM, AND FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION MANUAL ("SAGRILAF") OF ROCKWELL AUTOMATION COLOMBIA S.A. | | |
| Code: ML-SIG-002 | Version: 5 | Pass Date: 09/17/2024 | Department: CMS |

ANNEX J - DECLARATION OF CANDIDATES - FO-HR-010

By signing this document, I 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 compliance with requirements by authorities in order to continue with the linking process 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 personal data, unless there is an imperative legal or contractual duty to retain the information.
- Any request, query, update or claim regarding the personal data provided may be sent to the email privacy@ra.rockwell.com.
- The handling of my personal data will be done in accordance with the Personal Data Processing Policy of **ROCKWELL AUTOMATION COLOMBIA S.A.**, which can be validated at any time at the link: <https://www.rockwellautomation.com/es-co/company/about-us/legal-notices/privacy-and-cookiespolicy.html>

I will hold **ROCKWELL AUTOMATION COLOMBIA S.A.** harmless and exempt from all liability arising from erroneous, false, or inaccurate information that I have provided.

I declare that YES ___ NO ___ I am a Publicly Exposed Person ("PEP"), understood as any public servant 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 assets, money, or securities of the State.
- Administration of justice or administrative sanctioning powers.

PEPs shall also be individuals who oversee directing or managing resources in political movements or parties.

Candidate Signature: _____

Name: _____

ID Number: _____

Residence: _____

Date: _____