

**Self-control and Integral Risk Management System
Manual for Money Laundering, Financing of Terrorism
and Financing of the Proliferation of Weapons of Mass
Destruction.**

SAGRILAFT / FPWMD



Compliance Management



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1. General

1.1. Presentation

Taking into account the risks of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (hereinafter, the "ML/FT/FPADM"), it is necessary to implement risk management systems that comply with the requirements of the regulations in force. Alpina Productos Alimenticios S.A.S BIC (hereinafter the Company or Alpina) implements the Integral Risk Management and Self-Control System for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction - SAGRILAFT, in accordance with the provisions of Chapter X of the Basic Legal Circular of the Superintendencia de Sociedades (External Circular 100-000016 of December 24, 2020), Law 1474 of 2011, Law 2195 of 2022 and Law 2155 of 2021 and those regulations that modify or add to them.

1.2. Target

Establish the manual of the Self-Control and Integral Risk Management System for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction - SAGRILAFT, which contains the definitions, responsibilities, policies and procedures in order to prevent the Company, in the development of its activities, from incurring in ML/FT/FPADM risks.

1.3. Scope

The SAGRILAFT guidelines established in this document are mandatory for all of the Company's counterparties (shareholders, employees, associates, administrators and other related parties).

2. Legal Framework

2.1 International Standards

The FATF Financial Action Task Force published in 1990, forty recommendations to prevent money laundering and the financing of terrorism, which are accepted under Law 1186 of 2009, these include, among others, the points related to the risk approach, the points to take into account for the construction of a system for the control of the ML/FT/FPWMD risk and the sanctions that companies may incur in case they are used as instruments for the realization of this type of criminal acts.

Likewise, Colombia has ratified through the approval of national laws several of the conventions of the United Nations in order to face criminal conducts related to ML/FT/FPWMD. Among these are:

- 1988 Vienna Convention: United Nations Convention Against Traffic in Narcotic Drugs and Psychotropic Substances.
- 1999 United Nations Convention for the Suppression of the Financing of Terrorism
- Palermo Convention of 2000: United Nations Convention against Organized Crime
- Merida Convention 2003: United Nations Convention Against Corruption



2.2 National Regulations

- Article 84 of Law 222 of 1995 and Decree 1074 of 2015: which establishes that it is the responsibility of the Superintendencia de Sociedades to exercise oversight over companies and is empowered to impose fines and penalties on those who fail to comply with its orders, the law or the bylaws.
- Article 10 of Law 526 of 1999, as amended by Law 1121 of 2006: It states that the authorities exercising inspection, surveillance and control functions are responsible for informing their supervised parties of the guidelines for the information to be reported to the UIAF.
- Article 20 of Law 1121 of 2006: Regulations on publication and compliance with obligations related to lists binding on Colombia, in accordance with international law.
- Law 1186 of 2009: Whereby, among others, the Grupo de Acción financiera de Sudamérica contra el lavado de activos (GAFISUD) was created and it was decided to recognize and apply the FATF recommendations to prevent money laundering, as well as other provisions issued by this organization in the future.
- Article 2.14.2 of Decree 1068 of 2015: establishes that entities belonging to sectors other than the financial, insurance and securities sectors must report Suspicious Transactions to the UIAF.
- Circular-External Circular-100-000008-of-11-June-2021, presents the manner in which the Superintendencia de Sociedades will develop the supervisory functions with respect to the real sector entities under its supervision that must implement the Self-Control and Integral Risk Management Regime ML/FT/FPWMD,
- Modification of Chapter Ten of External Circular No. 100-000005 dated 22, 2017 Addition of literal d) of literal D of Numeral 2 of Chapter IX and elimination of numeral 4 of Chapter XI, referring to the implementation of the system of self-control and management of the risk of money laundering and financing of terrorism, in the Sociedades Administradoras de Planes de Autofinanciamiento Comercial - SAPAC (Pages 115 and 167).
- Chapter X of External Circular 100-000016 of December 24, 2020, modified by External Circulars 100-000004 of April 9, 2021 and 100-000015 of September 24, 2021: Defines the guidelines for the construction of a self-control and risk management system for money laundering and terrorist financing, obligated companies and the requirements for reporting to the UIAF.
- Article 631-5 of Law 2155 of 2021: Beneficial owner means the natural person(s) who ultimately owns or controls, directly or indirectly, a customer and/or the natural person on whose behalf a transaction is carried out also includes the natural person(s) who exercises effective and/or ultimate control, directly or indirectly, over a legal person or other unincorporated structure.



- Article 631-6 of Law 2155 of 2021: Create the Registro Único de Beneficiarios Finales - RUB, which shall be an integral part of the Registro Unico Tributario-RUT, whose operation and administration is the responsibility of the Unidad Administrativa Especial Dirección de Impuestos y Aduanas Nacionales - DIAN. When the person obliged by the Registro Único de Beneficiarios Finales-RUB to provide information of the beneficial owner, does not provide it, provides it in an erroneous or incomplete manner, or does not update the information provided, shall be sanctioned according to the provisions of Article 658-3 of the Estatuto Tributario.
- Chapter III of Law 2195 of 2022: The State Entity and the natural person, legal person or structure without legal personality or similar, that has the obligation to implement a system for the prevention, management or administration of the risk of money laundering, financing of terrorism and arms proliferation or that have the obligation to submit information to the Registro Único de Beneficiarios Finales (RUB), must carry out due diligence measures that allow among other purposes to identify the beneficial owner(s), taking into account at least the criteria mentioned in this chapter.
- Article 323 of the Colombian Criminal Code: Which establishes that whoever acquires, safeguards, invests, transports, transforms, stores, conserves, guards or administers goods that have their mediate or immediate origin in activities of migrant smuggling, human trafficking, extortion, illicit enrichment, extortive kidnapping, rebellion, arms trafficking, trafficking of minors, financing of terrorism and administration of resources related to terrorist activities, trafficking of toxic drugs, narcotics or psychotropic substances, crimes against the financial system, crimes against the public administration, smuggling, smuggling of hydrocarbons or their derivatives, customs fraud or favoring and facilitating smuggling, favoring smuggling of hydrocarbons or their derivatives, in any of its forms, or linked to the proceeds of crimes executed under a criminal conspiracy, or gives the goods coming from such activities the appearance of legality or legalizes, hides or conceals the true nature, origin, location, destination, movement or right over such goods, shall incur for such conduct alone, imprisonment of ten (10) to thirty (30) years and a fine of one thousand (1,000) to fifty thousand (50,000) legal monthly minimum wages in force.

The same penalty shall apply when the conducts described in the preceding paragraph are carried out on assets whose extinction of ownership has been declared.

Money laundering shall be punishable even if the activities from which the property or the acts punished in the preceding paragraphs were totally or partially carried out abroad.

3. Policies

The following are the guidelines established by the Company in order to carry out adequate self-

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monitoring and management of ML/FT/FPADM risks:

3.1 General Policies

- It is imperative for shareholders, board members and legal representative(s) to place the observance of the ethical principles, policies and procedures that make up SAGRILAFT before the achievement of business goals, considering that it is essential to generate a culture aimed at applying and enforcing the rules established for the prevention and detection of money laundering and the financing of terrorism and the financing of the proliferation of weapons of mass destruction.
- The Company is committed to compliance with national and international regulations aimed at preventing ML/FT/FPWMD risk; therefore, its managers, employees, associates, third parties and other interested parties shall strictly comply with the guidelines set forth in the Company's SAGRILAFT, which are included in this manual.

Any counterparty shall inform the Compliance Officer of any Unusual Transaction that it identifies because it is a transaction whose amount or characteristics are not related to the normal economic activity of the Company, or that, due to its number, amount or characteristics, does not fall within the guidelines of normality or ordinary business practices, or when it becomes aware of warning signals related to numeral 6 of this manual.

4. Stages of SAGRILAFT

In order to control and prevent ML/FT/FPWMD risks, the Company has implemented a management scheme that covers from the identification of ML/FT/FPWMD risks to the monitoring of the processes and their established controls, based on the Risk Management Methodology and the "SAGRILAFT-Alpina Risk Matrix", which are included as an Annex to this document.

4.1 Identification of ML/FT/FPWMD risk

For the identification of ML/FT/FPADM risks, internal and external conditions that are directly related to the company's mission and vision and that could negatively affect the objectives defined in the SAGRILAFT must be taken into account, such as risk factors: Clients, products, distribution channels and jurisdictions.

4.2. ML/FT/FPWMD Risk Assessment

The purpose of this stage is to qualify each of the risks identified in order to establish the Company's Inherent Risk, using the criteria of a team of internal experts, who measure semi-quantitatively the probability of occurrence of such risks and the impact they could generate if they materialize.

4.3. Control of ML/FT/FPWMD risk

Based on the result of the inherent risk assessment, this phase establishes the control activities to be applied in order to reduce the probability of occurrence or the impact of the materialization



of the identified risks.

The identification, updating, improvement or design of controls is carried out with the participation of process leaders and internal experts, who, with the support of their work teams, are responsible for subsequently implementing them and monitoring their execution.

4.4. ML/FT/FPWMD Risk Monitoring

Risk monitoring should be carried out on a regular basis, as established by the areas in charge or when there are significant changes in the company's structure or processes, so that new risks are identified, the level of criticality of existing risks is evaluated and the effectiveness of the controls applied is determined.

5. Due Diligence

5.1 Simplified Due Diligence

Due diligence refers to the initial and periodic review of the legal, accounting or financial and reputational aspects related to a third party, business or transaction, with the purpose of identifying and assessing ML/FT/FPWMD risks that may affect the Company.

Ongoing due diligence will take into account legal, financial, economic activity, including source of funds and transactions; the frequency of this monitoring will be established in the counterparty segmentation matrix.

The following are the queries and documentary supports to be managed by the Company as part of the due diligence process:

5.2 Knowledge of suppliers

Natural or legal persons wishing to become suppliers or contractors of the Company must be identified and comply with the process of linkage, by filling out the supplier linkage form and submitting supporting documentation for review and verification. The supplier must prove that the origin of its resources is legal.

5.1.1 Supplier linkage

- Master Data is the area in charge of managing the supplier linkage process, based on the information contained in the supplier linkage form, which, among other data, contains:
 - Name and identification number of the supplier. In the case of legal entities, the NIT and the name and identification of the legal representative must be indicated.
 - Address and telephone number of the supplier.
 - Declaration of the lawful origin of the supplier's resources and funds, indicating that they are lawful.
 - Declaration of the status of PEP, close associate or not, of the supplier or its legal representative.



- For natural persons, a copy of their identification document and for legal entities, the Certificate of Existence and Representation.

When the supplier is a legal entity, the name and identification of the partners or shareholders holding more than 5% of the capital or quotas must be requested, as well as for the final beneficiaries.

- Master Data must make the consultation in restrictive and control lists in the tool provided, of the data of the natural or legal person, its legal representative, its shareholders and final beneficiary.
- If at the time of verification there are any matches with the binding or control lists, Datos Maestros must suspend the creation of the supplier, generate the report of the identified matches and send it by e-mail to the Transparency and Compliance area.
- The verification of the supplier's information and of the binding and control lists, regardless of the result, must generate as support the document indicating the name of the person who carried out the process, the date and time of such verification.
- Supplier data, specifically: name, identification, address, legal representative, contact person, position, date of knowledge must be maintained in a unified database, in this case, SAP.
- The linking of the PEP as a supplier of the Company must be authorized by the compliance officer.

The enhanced due diligence to PEPs shall extend to (i) spouses or permanent partners of the PEP; (ii) relatives of the PEP, up to the second degree of consanguinity, second degree of affinity and first civil degree; (iii) Close Associates.

In addition to the common procedural measures of knowledge of the Counterparty, the Obligated Companies in the Enhanced Due Diligence process must: (i) obtain the approval of the higher hierarchical instance or employee for the linkage or to continue with the contractual relationship; (ii) adopt Reasonable Measures to establish the origin of the resources; and (iii) carry out a continuous and intensified monitoring of the contractual relationship.

Periodic monitoring of suppliers

- Datos Maestros must consult at least once (1) per year the complete supplier database in binding and control lists in the tool provided, including the information of the natural or legal person, its legal representative, its shareholders, and final beneficiary. The support of this activity must contain the name of the person performing the verification, the date and time of the verification.
- In case of finding matches in lists, an internal report will be generated to the Transparency and Compliance area.
- Suppliers that must be removed from the Company's databases due to association or background related to ML/FT/FPWMD according to the concept of the compliance officer must be blocked in the Company's databases, in order to prevent them from being linked again.

5.3 Customer Knowledge

Customers will identify themselves and make the declaration of origin of funds by filling out a

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form and submitting supporting documentation, all of which will be subject to verification. Alpina shall refrain from having any kind of relationship with anonymous clients and shall ensure that they do not appear under fictitious or inaccurate names:

Customer linkage

- 1) The areas requesting the linking of clients must request the established format from the client, verifying that all the information is duly filled in so that the Master Data area can perform the due validation, and ensuring that at least the following information is available:
 - a) To know the name and identification of the client natural person, or of the legal representative of the client legal person.
 - b) Know the customer's NIT, address, telephone number and economic activity,
 - c) Financial information (Assets, Liabilities, Equity, Income, Expenses), according to the type of client.
 - d) Acceptance of the declaration of origin of the client's resources and funds, indicating that these are licit.
 - e) When the client is a legal entity, the name and identification of the partners or shareholders holding more than 5% of the shares or quotas will be requested.
 - f) Declaration of the status of PEP, foreign PEP and close associates (Annex 1 PEP) of the client or its legal representative. In the event that the client does not fill out its PEP status and in the validation of Master Data the PEP status is identified, the requesting area is requested to inform the client to fill out Annex 1 PEP and the formal approval by mail of the Manager of the area, to proceed to send it to the Transparency and Compliance team for the respective EDD and approval by the Compliance Officer.
 - g) The client must submit a copy of his identification document for natural persons, and for legal entities, a Certificate of Existence and Representation.
- 2) At the time of linking, the Master Data area must verify the information of the person to be linked (natural or legal), of the partners holding more than 5% of the shares or participation quotas and of the beneficial owner against the existing restrictive and control lists. Datos Maestros must ensure the verification of all the clients of the organization, leaving evidence of this activity. Likewise, it will be verified that there are no warning signs, such as not delivering information.
- 3) The verification of the information and the restrictive and control lists, regardless of the result, must leave a record of the name of the Master Data person who performed the process, the date and time of such verification.
- 4) If at the time of verification there are any matches with the restriction and control lists, Master Data will not proceed with the creation of the client and will continue with step 5. If no matches are found, proceed to step 6.



- 5) Master Data will generate a report of these matches and send it via e-mail to the Transparency and Compliance area and/or the Compliance Officer.
- 6) The linking of the PEP as a client of Alpina must be authorized by the Compliance Officer.
- 7) The following customer information must be recorded in a unified database (SAP): name, identification, address, final beneficiary, legal representative, contact person and position held.

Periodic customer monitoring

- Master Data must compare the complete client database against the restrictive and control lists on an annual basis. Evidence of this activity shall be left, recording the name of the person performing the verification, the date and time of the verification.
- In case of finding matches in restrictive and control lists, an internal report will be generated to the Transparency and Compliance area and/or the Compliance Officer, who will decide whether the relationship with the counterparty should be terminated; in case of continuing with the relationship, a quarterly monitoring of the counterparties must be performed, which will consist of performing the consultation in the tool provided.
- In cases where the consultation of restrictive and control lists generates PEP matches, a quarterly monitoring of the counterparties will be carried out, which will consist of performing the consultation in the tool provided.

Warning signs

Some examples of warning signs are listed below for illustrative purposes and are not exhaustive. Counterparties should alert any situation that falls outside the normal parameters of behavior:

- Operations that do not match the economic capacity and profile of the client.
- Sudden change in financial behavior.
- Customer who performs large transactions and does not declare a relevant employment or activity that justifies the related amounts.
- Customer who performs repeated transactions in the name of third parties.
- When the client makes cash deposits without justification.
- When verifying the information provided by the client, there are differences and inconsistencies.
- When the transport document is in the name of an experienced customer and is endorsed to a customer with no track record in the industry.



- When there are coincidences in the name or identification number in restrictive and control lists.
- Imports and exports carried out by clients with a history of violations to the Criminal Law.
- Imports and exports that are not directly related to the customer's economic activity.

5.4 Knowledge of Collaborators

Employee engagement

- 1) During the employee selection stage, the Talent selection area must collect the candidate's name, identification, telephone number and address, and a copy of his or her identification document.
- 2) The validation in restrictive and control lists must initially be carried out by the selection area and, in addition to these verifications, safety studies are carried out with external suppliers, who must keep a record of the results.
- 3) If at the time of verification there are any matches with the restrictive and control lists, Talent should not link the candidate and should continue with step 4. If no matches are found, proceed to step 5.
- 4) The Talent selection area will generate a report of these matches and will forward it to the Transparency and Compliance area and/or the Compliance Officer for the respective EDD and approval by the Compliance Officer.
- 5) If a PEP is identified as an applicant of Alpina as part of the linking process, the Transparency and Compliance area shall be informed in order to make the respective EDD, which must be authorized by the Compliance Officer.

Periodic monitoring of collaborators

Monitoring activities and frequencies will depend on what is defined in the segmentation matrix (see annex "Alpina segmentation matrix").

- Identify atypical behaviors in their collaborators that may be indicative of illicit activities and ML/FT/FPWMD .
- Atypical behavior shall be reported to Alpina's Ethics Line or directly to the Compliance Officer.
- The headcount must be checked annually against the restrictive and control lists. Evidence shall be left of the name, date and time of this activity.
- In case of finding matches, the report must be sent to the Transparency and Compliance area and/or the Compliance Officer for the respective EDD and approval by the Compliance Officer.



Warning signs

- Collaborators with a level of expenses that does not correspond to the amount of their declared income.
- Employees who prevent another employee from serving certain customers without justification
- Employees who present important changes in their economic profile and standard of living without apparent justification.
- Partners showing an unexpected and very large increase in sales.
- When there are coincidences in the name or identification number in restrictive and control lists.
- Employees who accumulate too many vacation periods.

5.5 Knowledge of shareholders

- The information of new shareholders must be verified in restrictive and control lists in the tool provided, including the data of the natural or legal person, its legal representative and the beneficial owner.
For current shareholders, this consultation process will take place at least once (1) per year.
- The result of the verification must be reported to the Transparency and Compliance area.

5.6 Knowledge of Politically Exposed Persons (PEPs)

Once a PEP counterparty or PEP beneficial owner is identified in any of the counterparties, applicants or proponents, enhanced due diligence procedures must be applied, with which, in addition to the consultation in the restrictive and control lists, the following processes are applied in order to ensure greater knowledge of the counterparty and stricter controls to the operations:

- Once the area in charge of linking the counterparty identifies the PEP status, it must ensure that the supply of information and supports required by Alpina to know the PEP status are complete.
- The query must be made in restrictive and control lists, leaving support of the query.
- The internal report must be made to the Transparency and Compliance area, which will proceed to conduct enhanced due diligence of the counterparty, making sure to identify and verify the identity of the PEP and related persons.



- The due diligence report must be sent to the Compliance Officer for analysis and respective approval.

5.5.1 Criteria defined by Alpina's highest corporate body (PEP, family nucleus, close associates).

- No matches on restrictive and control lists (related to ML/FT/FPWMD offenses), analysis of past and current investigations, convictions for money laundering, financing of terrorism and financing the proliferation of weapons of mass destruction and other related offenses.
- Enhanced Due Diligence (Evaluate the perception of legal background, reputations in the media and in individual consultations)
- Determine whether the counterparty's sources of income are legitimate
- Evaluate the level of the PEP's position and its duration. Example: (Minister, Mayor, Councilor) since a higher level position may generate a higher level of risk.
- Approval by the Compliance Officer.

5.7 Measures to manage ML/FT/FPWMD in import operations

In order to prevent and control the occurrence of smuggling activities, drug trafficking, trafficking of substances for the processing of narcotics, arms trafficking, currency trafficking and/or drug trafficking in Alpina's import operations, the mechanisms and controls defined in the ML/FT risk matrix have been adopted.

As part of the import process, at least the following activities will be carried out:

- Verify that the counterparty has satisfactorily complied with the linking and/or updating process.
- Verify with the documents issued by the customs authorities that the country of origin or destination of the goods complies with international recommendations against ML/FT/FPWMD.

5.8 Measures to manage ML/FT/FPWMD in export operations

In order to prevent and control the occurrence of smuggling activities, drug trafficking, trafficking of substances for the processing of narcotics, arms trafficking, currency trafficking and/or drug trafficking in the export operations of Alpina Productos Alimenticios S.A.S. BIC, the mechanisms and controls defined in the ML/FT risk matrix have been adopted.

As part of the export process, at least the following activities will be carried out:

- Verify that the counterparty has satisfactorily complied with the linking and/or updating process.
- Verify with the documents issued by the customs authorities that the country of origin or destination of the goods complies with international recommendations against ML/FT/FPWMD.



5.9 Study of movable and immovable property

The Legal Department will verify that the following guidelines are taken into account for the acquisition of assets and property:

- Owners and intermediaries in the sale of assets or goods shall follow the same process of knowledge of suppliers indicated in this Manual.
- In the case of real estate, in addition to the owners and intermediaries, Alpina will verify in restrictive and control lists the holders of the last years.
- In the purchase of vehicles and furniture subject to registration, all previous owners of the property shall be verified in restrictive and control lists.

5.10 Enhanced Due Diligence (EDD)

They correspond to a more exhaustive process of investigation and analysis that goes beyond the standard due diligence obtained from the verification in control and/or restrictive lists. EDDs are used when there are higher risks or suspicions of illicit activities, such as money laundering, financing of terrorism, financing of proliferation of weapons of mass destruction.

They are required when a commercial relationship or client presents characteristics that increase the level of risk, generally (but not always) these are derived from the result of the verification of control and/or restrictive lists and associate natural or legal persons that are classified with exact matches to crimes associated with money laundering, financing of terrorism, financing of the proliferation of weapons of mass destruction.

5.11 Intensified Due Diligence (IDD)

Enhanced due diligence refers to the additional steps the company takes to assess and mitigate the risks associated with certain transactions or business relationships that are considered high risk. This level of diligence is necessary when the inherent risks are higher than normal due to factors such as the nature of the transaction, the customer profile or the jurisdiction involved.

Characteristics of Intensified Due Diligence:

- **Deeper Risk Assessment:** Involves a more detailed review of the customer's background, including obtaining additional information on the customer's identity, the nature of the customer's business activities and the source of funds.
- **Continuous Monitoring:** Requires more frequent and detailed monitoring of customer transactions and activities.
- **Information Validation:** The information provided by the client is further verified, using independent sources whenever possible.
- **Higher Level Approvals:** Additional approvals from higher levels within the company are required before proceeding with the relationship or transaction.



- The enhanced due diligence to PEPs shall extend to (i) the PEP's spouses or permanent partners; (ii) the PEP's relatives, up to the second degree of consanguinity, second degree of affinity and first civil degree; (iii) Close Associates.
- In addition to the common procedural measures of knowledge of the Counterparty, the Obligated Companies in the Intensified Due Diligence process must: (i) obtain the approval of the higher hierarchical instance or employee for the linkage or to continue with the contractual relationship; (ii) adopt Reasonable Measures to establish the origin of the resources; and (iii) carry out a continuous and intensified monitoring of the contractual relationship.

The Intensified due diligence process shall contain at a minimum:

-**Consultation** in the tool provided, additional, individual consultation in restrictive lists, control lists, search in public sources and press releases.

-**Depending** on the criticality of the case, a more detailed report of the counterparty's information will be generated in the tool provided (financial, accounting, economic activity, commercial relations, international operations).

-A report must be generated with all the information gathered, which will depend on the approval of the compliance officer.

In addition to the measures applied within the due diligence process, the following procedures, among others, must be applied for these counterparties:

-Approval of the Compliance Officer to bind or to continue with the contractual relationship.

-Request for additional information to determine the origin of the funds, as defined by the Compliance Officer for such purpose.

-Constant monitoring of the operations carried out with the third party and in general of the contractual relationship.

5.12 Segmentation model.

A methodology was established to perform the segmentation of the different ML/FT/FPADM risk factors, in order to determine those segments that, according to their risk level, require a higher frequency and greater detail in monitoring.

Once the risk factors are evaluated, the tabulation weighting assigns a rating to the counterparties identifying the level of risk:

- Low with a rating of 1
- Moderate with a rating of 2
- Intermediate with a score of 3
- High with a rating of 4
- Critical with a rating of 5.

The score will place the counterparty in a rating cell, depending on the risk of the development of its activity and its nature, in order to monitor its transactions with the periodicity recommended by the risk category.



Monitoring Table

ML/FT/FPADM Risk Profile -C/TB	Rating	Monitoring
1 - Low Risk	0, < 2	Annual
2 - Moderate Risk	>2 < 4	
3 - Intermediate Risk	>4.1 < 5	
4 - High Risk	> 5.1 < 6	Semiannual
5 - Critical Risk	>8 < 10	

The segmentation matrix will be reviewed on an annual basis of the variables to examine whether it effectively provides knowledge about the third party.

The compliance area may also include other factors in addition to materiality that allow for more knowledge of the third party, its environment and economic activity.

6. Self-Control and Risk Management System ML/FT/FPWMD - SAGRILAFT

6.1 Elements of SAGRILAFT

The SAGRILAFT consists of the following elements: design, approval, monitoring, disclosure and training included in the manual, as described below, and should be translated into a rule of conduct that guides the actions of the Company, its employees, associates, managers and other related parties or interested parties.

• **6.1.1. Design and approval**

The design of the SAGRILAFT is in charge of the Compliance Department and takes into account the materiality, the characteristics of the company and its activity, as well as the identification of the ML/FT/FPWMD Risk Factors.

Alpina's highest corporate body is in charge of approving the SAGRILAFT, after the joint presentation by the legal representative and the Compliance Officer. The minutes of the corresponding meeting shall be left as a record.

• **6.1.2 Audit and compliance with SAGRILAFT**

The compliance officer, together with the Transparency and compliance area, will evaluate the reports submitted by the statutory auditor and the internal audit, in order to adopt the required measures and action plans.

Alpina's SAGRILAFT contemplates sanctions or consequences for employees, managers, associates or third parties for non-compliance or non-observance of its provisions.

• **6.1.3 Disclosure and Training**

The SAGRILAFT shall be disclosed within the company and to other interested parties, in the form and frequency to ensure proper compliance, at least once (1) a year.



The Transparency and Compliance area will design an annual training plan for all counterparts, in order to strengthen knowledge of SAGRILAFT, which will be recorded. Minimum training criteria will be taken into account, which are:

- Identify that it is an unusual or suspicious operation.
- Content and form of reporting
- Among others (Those defined by the Compliance Officer)

6.2 Assignment of duties to responsible persons and other general information

The different parties responsible for activities associated with the Integral ML/FT/FPWMD Self-Control and Risk Management System shall be in charge of the following functions to guarantee the proper functioning, compliance and effectiveness of the system:

6.2.1 Maximum Corporate Body

The highest corporate body is responsible for the implementation and effectiveness of SAGRILAFT. To this end, it shall have the organizational structure to ensure the effective achievement of these purposes:

- Establish and approve for the Company an ML/FT/FPWMD Policy.
- Approve the SAGRILAFT and its updates, presented by the legal representative and the Compliance Officer.
- Approve the SAGRILAFT procedures manual and its updates.
- Selecting and appointing the Compliance Officer
- Analyze in a timely manner the reports on the operation of SAGRILAFT, on the proposals for corrective actions and updates submitted by the Compliance Officer, and make decisions on all the issues discussed therein. This shall be recorded in the meeting minutes.
- Analyze reports and requests submitted by the legal representative in a timely manner.
- To pronounce on the reports submitted by the statutory auditors or internal and external audits, which are related to the implementation and operation of SAGRILAFT, and to follow up on the observations or recommendations included. This follow-up and its periodic progress shall be recorded in the corresponding minutes.
- Order 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.
- Establish the criteria for approving the linking of Counterparty when it is a PEP.



- Establish guidelines and determine those responsible for conducting audits on the compliance and effectiveness of SAGRILAFT if so determined.
- Verify that the Compliance Officer has the necessary availability and capacity to perform his/her duties.
- Verify that the Company, the Compliance Officer and the legal representative carry out the designated activities in accordance with the provisions of the SAGRILAFT.

6.2.2 Legal Representative

The following are the functions to be performed by the Legal Representative with respect to SAGRILAFT:

- Submit with the Compliance Officer, for approval of the highest corporate body, the proposed SAGRILAFT and its updates, as well as its respective procedures manual.
- Study the results of the ML/FT/FPWMD risk assessment carried out by the Compliance Officer and establish the corresponding action plans.
- Efficiently allocate the technical and human resources, as determined by the highest corporate body, necessary to implement SAGRILAFT.
- Verify that the Compliance Officer has the necessary availability and capacity to perform his/her duties.
- Provide effective, efficient and timely support to the Compliance Officer in the design, direction, supervision and monitoring of SAGRILAFT.
- Submit to the highest corporate body the reports, requests and alerts that it considers should be dealt with by such bodies and that are related to SAGRILAFT.
- Ensure that the activities resulting from the development of SAGRILAFT are duly documented, so that the information meets the criteria of integrity, reliability, availability, compliance, effectiveness, efficiency and confidentiality.
- To certify before the Superintendence of Companies the compliance with the provisions of current regulations with respect to SAGRILAFT, when required by the entity.
- Verify that SAGRILAFT procedures comply with the ML/FT/FPADM Policy adopted by the highest corporate body.

6.2.3 Compliance Officer

6.2.3.1 Minimum requirements of the Compliance Officer

The Compliance Officer must actively participate in the design, management, implementation, auditing, compliance verification and monitoring procedures of SAGRILAFT, and be able to make decisions regarding ML/FT/FPWMD risk management. At a minimum, the Company's Compliance Officer must meet the following requirements:

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- Have the ability to make decisions to manage ML/FT/FPWMD risk and have direct communication with, and report directly to, the highest corporate body.
- Understand the operation of the Company and have sufficient knowledge in risk management matters, in accordance with the provisions of current regulations related to the prevention of ML/FT/FPADM.
- To 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 to belong to the management or corporate bodies, nor to the internal or external audit or control bodies (statutory auditor or linked to the statutory audit firm that performs this function, if applicable) or whoever performs similar functions or takes their place in the Obligated Company.
- Not to act as Compliance Officer in more than ten (10) Obligated Companies. To act as Compliance Officer of more than one Obligated Company, (i) the Compliance Officer must certify; and (ii) the highest corporate body must verify that the Compliance Officer does not act as such in Companies that compete with each other.
- 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.

6.2.3.2 Responsibilities of the Compliance Officer

The Company's Compliance Officer shall perform the following duties with respect to SAGRILAFT:

- Ensure effective, efficient and timely compliance with SAGRILAFT.
- Present, at least once a year, reports to the highest corporate body. At a minimum, these reports shall contain an evaluation and analysis of the efficiency and effectiveness of the SAGRILAFT and, if applicable, propose the respective improvements. Likewise, demonstrate the results of the Compliance Officer's management, and of the Company's management, in general, in the compliance with the SAGRILAFT.
- Promote the adoption of corrective measures and updates to the SAGRILAFT, when circumstances so require and at least once every two (2) years. To this end, it shall submit to the highest corporate body the proposals and justifications for the corrective measures and updates suggested to SAGRILAFT.
- Coordinate the development of internal training programs.
- Evaluate the reports submitted by the internal audit or whoever performs similar



functions or takes their place, and the reports submitted by the statutory auditor or the external audit, as the case may be, and adopt Reasonable Actions to address the deficiencies reported. If the measures to be adopted require authorization from other bodies, it shall promote that these matters be brought to the attention of the competent bodies.

- To certify to the Superintendence of Corporations the compliance with the provisions of the regulations in force, as required by this entity.
- Verify compliance with the Due Diligence and Enhanced Due Diligence procedures applicable to the Company.
- Ensure the adequate filing of documentary supports and other information related to the management and prevention of ML/FT/FPADM Risk.
- Design the methodologies for classification, identification, measurement and control of ML/FT/FPWMD risk that will be part of the SAGRILIFT.
- To carry out the assessment of the ML/FT/FPWMD risk to which the Company is exposed.
- To make the Suspicious Transactions Report to the UIAF and any other report or report required by the provisions in force, as established by the regulations in force.

6.2.4 Inabilities and incompatibilities of the Compliance Officer

The Compliance Officer may not hold the position of Compliance Officer if he/she is disqualified or incompatible to do so. For this reason, the following shall be grounds for the Compliance Officer not to take office, or having done so, must cease to hold office:

- Belonging to the management or corporate bodies, nor to the internal or external audit or control (statutory auditor or linked to the statutory audit firm that performs this function, as the case may be) or whoever performs similar functions or takes their place in the Obligated Company.
- Not to serve as Compliance Officer in more than ten (10) Obligated Companies. In order to act as Compliance Officer of more than one Obligated Company, (i) the Compliance Officer must certify; and (ii) the body that appoints the Compliance Officer must verify that the Compliance Officer does not act as such in Companies that compete with each other. 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.

6.2.5 Statutory Auditor

Their functions correspond to those expressly set forth in the law, in particular Article 207 of the Code of Commerce, which states, especially, the obligation to report to the UIAF of Suspicious Transactions, when they become aware of them within the ordinary course of their work, as

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stated in paragraph 10 of said article.

In order to fulfill his duties, the statutory auditor, in the analysis of accounting and financial information, must pay attention to indicators that may give rise to suspicion of an act related to a possible ML/FT/FPWMD .

6.2.6 Internal Audit

In addition to the functions assigned corporately, the Internal Audit may, as a good practice, include within the annual audit plans the review of the effectiveness and compliance of SAGRILAFT in order to serve as a basis for both the Compliance Officer and the Company's management to determine the existence of deficiencies in SAGRILAFT and their possible solutions. In this regard, the result of such internal audits must be communicated to the legal representative, the Compliance Officer and the Board of Directors.

6.2.7 Collaborators.

It is the responsibility of every Alpina employee:

- Comply with the policies, procedures, manuals and/or instructions corresponding to self-control and integral risk management of Money Laundering, Financing of Terrorism, Financing of the Proliferation of Weapons of Mass Destruction (ML/FT/FPWMD) - SAGRILAFT
- Participate in the training processes to which they are summoned.
- Refrain from authorizing, motivating, approving, participating in or tolerating non-compliance with this policy.
- Report through the ethical channels provided by the Company any breach of this policy.
- Notify the Immediate Supervisor and the Compliance Officer when he/she detects in an operation, business or contract or in the development of the activities under his/her charge, a warning signal or situation that may be considered unusual.
- Refrain from retaliating, directly or indirectly, or encouraging others to do so, against any other employee for reporting a suspected violation of this policy.

6.2.8 Content of the reports by the different organs

The reports to be submitted by the legal representative, the Compliance Officer or the internal control bodies, as the case may be, shall report on the results, analysis, evaluations and corrective measures in the implementation, management, progress, compliance, difficulties and effectiveness achieved through SAGRILAFT. The statutory auditors and internal audit may include proposals for improvement when appropriate.

6.3 Incompatibilities and disqualifications of the different organs

In establishing the bodies and instances in charge of evaluating the compliance and effectiveness of the SAGRILAFT, the Obligated Company shall take into account conflicts of interest, incompatibilities and disqualifications of those responsible in the performance of their duties. To this end, it is recommended to review the provisions of the Basel Committee on Banking Supervision on the three (3) lines of defense to prevent and control ML/FT/FPWMD Risk.



In this sense, due to the difference in the functions that correspond to the statutory auditor, the legal representative and the Compliance Officer, the statutory auditor or the legal representative should not be appointed as Compliance Officer.

7 Warning signs

The following are some warning signs of ML/FT/FPWMD risk to be taken into account by all the company's employees, but they are not exhaustive and are only an example:

Regarding transactions with counterparties

- Suppliers, whether natural or legal persons, who are not fully identified or who refuse to provide the information required to perform the due diligence process.
- Counterparties with negative reports in the list of persons designated by the OFAC and in the binding lists for Colombia, or any other internal or external list adopted by the company.
- Associates with a judicial history of ML/FT
- New associates that have been accepted or linked without previously verifying the origin of the resources they contribute.

With respect to transactions, business or contracts

- High-volume cash transactions with no apparent justification
- Movable or immovable property at prices significantly different from normal market prices
- Donations that have no apparent Final Beneficiary, whose origin is unknown or which are domiciled in a high-risk country or jurisdiction.
- Relevant transactions, businesses or contracts that are not recorded in writing
- Payments of transactions with funds derived from international money transfers from several senders to the same beneficiary, or from the same sender to several recipients, with no apparent relationship.
- Operations with subcontractors that have not been identified.
- Commercial or business transactions with persons included in the Binding Lists.
- Transactions entered into with Counterparties domiciled or located in Geographical Areas designated by FATF as non-cooperative.
- Transactions with proceeds from illegal activities (including, but not limited to, smuggling)



- Transactions with products that have not been duly nationalized
- Operations with Restricted Sale Products that do not have the proper authorizations or licenses.

With respect to cash transactions

- Cash from countries with a high level of corruption and political instability
- Cash deposits in personal or corporate bank accounts from unexplained sources
- Unjustified documentation about, or not corresponding to, origin or owner
- Quantity, value or currency not consistent with the circumstances of the bearer
- Invoicing or cash sales not expected in the economic sector
- Foreign loans received in cash and in local currency.

8 Technological Infrastructure

Alpina has the following tools (software, hardware, data and communications) that support the work of the Compliance Officer:

- Acquisition of knowledge regarding our counterparts): SAP ERP
- ML/FT Risk Management (SARGRILAFT Stages): EXCEL
- Consolidation and Reporting (Internal and External Reporting): MS OFFICE / ERP SAP
- Transactional Monitoring (Detection and Alerts): MS OFFICE / ERP SAP

These tools interact with Alpina's existing systems and/or applications, mainly with the databases that contain the knowledge information of the risk sources and the transactional system.

On the other hand, the Compliance Officer can access external information such as lists, press, requests from authorities, verifications, audits and evaluations, which strengthen his analysis work.

9 Complaints channel.

Alpina provides Compliance Subjects with a mechanism through which they can contact the Compliance Officer in order to resolve any concerns regarding the scope and interpretation of the SAGRILAFT.

The Company has an ethics line that allows its shareholders, directors, employees and dependents in good faith, confidentially and without fear of reprisals, to report irregular conduct in the following matters to the organization:



- Conflict of Interest with Third Parties
- Non-compliance with SAGRILAFT Policies and Procedures

Collaborators, Suppliers, Contractors or Senior Management shall send their communications in matters related to SAGRILAFT, confidentially, in good faith and without fear of reprisals to the Compliance Department through the following channels:



01-8000 188899
(1) 5 71 86 23 en C/marca



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In any case, the Directorate shall maintain the confidentiality of the complainant, the facts investigated, and the person or persons against whom the complaint has been filed.

Compliance Subjects must bear in mind that it shall be a violation of the SAGRILAFT when they fail to denounce or report actions known to them that have been carried out by any other Compliance Subject, or when they refuse to cooperate in the investigations that arise on the occasion of a complaint. Alpina will not undertake any retaliation against any Compliance Subject who, in good faith, reports through viable alternatives any behavior that in its judgment may constitute a violation of the Company's SAGRILAFT.

10 Internal and external reports

10.1 Internal Reports

It is the responsibility of all the company's employees to inform the Compliance Officer in case of identifying operations that may be classified as unusual or coincide with the warning signs mentioned above or others that are so considered, attaching the pertinent supports.

Once the report is received, the Compliance Officer must validate the facts to determine if it is indeed an unusual or suspicious transaction (STR) and act in accordance with numeral 10.2.1, in addition to submitting the other internal reports provided for in the compliance officer's duties.

10.2 External Reports

10.2.1 Suspicious Transaction Report (STR)



Unusual or suspicious operations identified or verified by the Compliance Officer must have the supporting documents that prove them as such, which must be kept in accordance with the provisions of Article 28 of Law 962 of 2005 on the conservation of books and commercial papers.

All suspicious transactions identified must be reported immediately by the Compliance Officer to the UIAF, in the nature of STRs through SIREL.

In the event that a quarter elapses without the Company making a STR, the Compliance Officer, within ten (10) calendar days following the expiration of the respective quarter, shall file a "no STR" or "ASTR" report through SIREL.

10.2.2 Requests for information from authorities

Responses to requests for information on the processes of self-control and comprehensive risk management of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction made to the Company by the different competent authorities shall be coordinated and addressed through the Compliance Officer.

The Compliance Officer shall evaluate the response and the documents to be sent to the control entities. In the case of control entities such as: DIAN, UIAF, Superintendencia de Sociedades, he/she may deliver, according to his/her criteria, all the necessary information for the corresponding review and verification.

11 Sanctioning Regime

11.1 Penalties to counterparties

In the event of non-compliance with the guidelines set forth in this manual by a counterparty, the Company will apply the disciplinary and sanctioning procedures established in the contracts and the regulations applicable to the type of fault.

In the event of non-compliance by a contractor, the penalty clauses established in the contract shall be applied, and the contractual relationship may be terminated unilaterally, without the right to compensation. The same shall apply to the violation of the work contract and/or the Internal Regulations.

12 Updating and dissemination.

This policy must be reviewed, updated and approved at least every two years by the Board of Directors or highest corporate body and/or when new legal or internal regulations are to be considered.

Any changes will be communicated to all Employees, as well as to the stakeholders to whom

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they apply.

13 Document Management

The supporting documentation of the program is located in a SharePoint provided by the company, where you can find documentation and information related to: manuals, policies, matrices, procedures, linking counterparties, training, disclosures and enhanced due diligence, which will be retained for a period of 10 years.

14 Related Documents

- Annex 1 PEP's (attachment form)
- Annex II: DEFINITIONS
- Annex III: LAFT-PADM Risk Management Methodology
- Annex IV: SAGRILAFT-Alpina risk matrix
- Annex V: Alpine Segmentation Matrix
- Annex VI: Alpine Segmentation Procedure

15 Change control

Note: The person responsible for the system must ensure that the information contained in this document is constantly updated.

Change Control									
Version	Detail	Prepared by		Reviewed		Approved		Validity	
		Name	Charge	Name	Charge	Name	Charge		
1	Implementation	Alejandra Supelano		Gilberth Sanabria		Highest corporate body		11/09/2019	25/11/2021
2	Update	Paola Conde		Gilberth Sanabria		Highest corporate body		26/11/2021	30/09/2023
3	Update	Juan Avila G		Gilberth Sanabria		Highest corporate body		30/09/2023	28/06/2024
4	Update	Gilberth Sanabria		Ana Maria Silva		Highest corporate body		28/06/2024	To date