



FOR STAKEHOLDERS, SUPPLIERS, EMPLOYEES AND SHAREHOLDERS

EXECUTIVE SUMMARY OF OUR PREVENTION AND CONTROL POLICIES ABOUT THE RISK OF MONEY LAUNDERING, TERRORISM FINANCING, FINANCING THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION, CORRUPTION AND TRANSNATIONAL BRIBERY.

Visdecol SAS is a Colombian company monitored by Superintendence of Companies.

In compliance with current regulations, this company has designed and implemented a Comprehensive Risk Management and Auto-Control System for Money Laundering, Terrorism financing, Financing the Proliferation of Weapons of Mass Destruction (SAGRILAFT), and a Transparency and Business Ethics Program (PTEE), which guides the company to manage this risk and provides the Senior Management of ABC SA with reasonable security about its compliance.

The main objective of this policy is to devise guidelines for preventing and controlling the risk of ML/TF/FPWMD and transnational corruption and bribery (TC/B) to minimize the possibility (through the different activities carried out by the Company in the development of this operations) that these resources may be channeled through the company. This could be a mechanism for concealment, handing, investment or use of any kind of money and other assets derived from illegal activities, committing corruption crimes and violation of transparency, public ethics and/or morals.

In light of the foregoing, please be informed that Visdecol SAS:

- Is committed to preventing the company from being involved in illegal activities.
- Declares that the fulfillment of mission objectives is subject to compliance with regulations on prevention and control related to SAGRILAFT and PTEE.
- The company will align all its business processes with the aspects defined in its SAGRILAFT Manuals and Compliance Manual (PTEE).
- It will set forth clear procedures for liaising with counterparties (Stakeholders, Suppliers, Clients, Employees and Shareholders), whether natural or legal persons, through the fulfillment of the requirements established in its commitment forms and the provision of supporting documents accompanied by their verification. The foregoing will be subject to due diligence, according to the risk profile.
- Develop counter parts segmentation processes in an annual basis, considering issues, such as: level of purchasing or selling, jurisdiction, type of entity, economic activity, etc.
- The company will not engage in contractual relationships with clients, employees, suppliers of third parties included in the binding or restrictive lists.



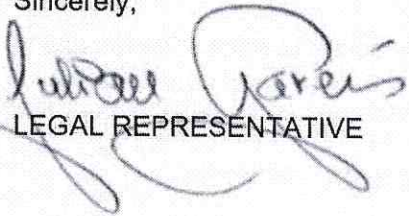
- Identification of third parties with a background of ML/TF/FPWMD and (TC/B) offenses will be considered a criterion for denying or terminating a contractual relationship.
- Information of its counterparties will only be disclosed at the express and formal request of the competent authorities.
- Publicly censoring any interna or foreign illegal activity or conduct involving ML/TF/FPWMD and TC/B activities.

This Policy is mandatory, as well as all related procedures should be followed by corporate staff, shareholders, clients, suppliers and other third parties that are linked to the company, and a disciplinary chapter derived from non-compliance with these policies is set forth in the company's manuals.

Please bear in mind that:

- If you have information or knowledge of activities that may involve Visdecol SAS or any of its counterparties (Stakeholders, Employees, Shareholders, Clients or Suppliers) and that may result in money laundering activities, terrorism financing, corruption, bribery, transnational bribery, or any other conduct against the law, hotlines are available in our website to report these crimes, and an email can be sent to our Compliance Officer's email address: oficialdecumplimiento@visdecol.com or to our Ethics Department, email: lineaetica@visdecol.com These reports will be confidential.
- In addition, the Superintendence of Companies has set up a hotline for complaints, which ca be accessed from the entity's website (supersociedades.gov.co).
- Finally, we recommend reading the full Spanish version of both SAGRILAF and Compliance (PTEE) manuals for a better understanding, which are published on our website.

Sincerely,



LEGAL REPRESENTATIVE