

PLANNING AND RISKS	
COMPLIANCE MANUAL	PLRIMA-001

COMPLIANCE MANUAL

NEW STETIC

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INTRODUCTION

New Stetic incorporates risk management practices that enable it to prevent events and protect itself from the impact they could have, ensuring sustainability and compliance with its organizational objectives, taking into account initiatives to maintain operations in an environment of security, transparency, and trust.

Likewise, it complies with current regulations that apply to it due to the development of its activities, the Comprehensive Self-Control and Risk Management System for Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (SAGRILAFT) and the Business Transparency and Ethics Program (PTEE). It supports the efforts of national and international government entities to prevent criminal conduct that affects the economic, political, and social stability of countries and their markets.

1. Objectives

- Establish guidelines and define policies that allow for the identification, analysis, evaluation, treatment, communication, and monitoring of risks related to The Comprehensive Self-Control and Risk Management System for Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (SAGRILAFT), the Business Transparency and Ethics Program (PTEE), and other compliance programs that the company must have.
- Consolidate a culture of ethics and transparency that guarantees valuable relationships with our stakeholders, mitigating the risks of money laundering, terrorist financing, proliferation of weapons of mass destruction, fraud, corruption, bribery, transnational bribery, violations of the Code of Ethics, among others.

2. Scope

The implementation of this Manual covers all processes, projects, businesses, and activities in which risk factors are present and there are relationships with stakeholders, especially in contractual or commercial transactions, in order to prevent the materialization of risks associated with the Comprehensive Money Laundering Risk Management and Self-Control System, Terrorism Financing, and Proliferation Financing of Weapons of Mass Destruction (SAGRILAFT), the Business Transparency and Ethics Program (PTEE), the Code of Ethics, and other compliance programs that the company must have.

Additionally, compliance is mandatory for all members of the Board of Directors, Partners, Collaborators, Suppliers, Contractors, Clients, and any other interested party directly or indirectly linked to the company. This also applies to subsidiaries New Stetic Mexico and New Stetic USA.

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3. Legal Framework

- Circular 170 of 2002 of the DIAN Prevention and Control of Money Laundering
- Law 962 of 2005 Article 28 Document Retention
- Resolution 285 of 2007 Financial Information and Analysis Unit (UIAF)
- Resolution 212 of 2009 Financial Information and Analysis Unit (UIAF)
- Law 1474 of 2011 Anti-Corruption Statute
- Resolution 017 of 2016 Financial Information and Analysis Unit (UIAF)
- External Circular 100-000016 of 2020 Superintendency of Companies SAGRILAFT
- External Circular 100-00004 of 2021 Superintendency of Companies SAGRILAFT
- External Circular 100-0000-11 of 2021 Superintendency of Companies PTEE
- External Circular 100-0000-12 of 2021 Superintendency of Companies PTEE
- Decree 830 of 2021 PEP
- Law 2195 of 2022 Business Transparency and Ethics Program

4. Definitions

- **Total assets:** all current and non-current assets recognized in the financial statements that correspond to the economic resources controlled by the company.
- **Virtual assets:** digital representation of value that can be traded or transferred digitally and can be used for payments or investments.
- **Geographic Area:** the area of the territory where the Company carries out its activities.
- **Compliance Audit:** systematic, critical, and periodic review of the proper implementation and execution of the Self-Control and Comprehensive Risk Management System for Money Laundering, Terrorist Financing, and Proliferation Financing of Weapons of Mass Destruction (SAGRILAFT), and the Transparency and Business Ethics Program (PTEE).
- **Ultimate Beneficial Owner:** the natural person(s) who ultimately owns or controls a customer or the natural person in whose name a transaction is carried out. It also includes the person(s) who exercise effective and/or ultimate control, directly or indirectly, over a legal entity or other structure without legal personality. The following are Ultimate Beneficiaries of the legal entity:
 - a. Natural person who, acting individually or jointly, exercises control over the legal entity, under the terms of Article 260 et seq. of the Commercial Code
 - b. A natural person who, acting individually or jointly, directly or indirectly owns five percent (5%) or more of the capital or voting rights of the legal entity, and/or benefits from five percent (5%) or more of the income, profits, or assets of the legal entity
 - c. When no natural person is identified in paragraphs 1) and 2), the natural person who holds the position of legal representative, unless there is a natural person who holds greater authority in relation to the management or direction of the legal entity.

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- **Reporting channel:** online reporting system for acts of transnational bribery, provided by the Superintendence of Companies on its website.
- **Corruption:** all conduct aimed at benefiting a company, or seeking a benefit or interest, or being used as a means in the commission of crimes against the public administration or public property or in the commission of acts of Transnational Bribery.
- **C/ST:** Corruption and Transnational Bribery
- **Due diligence:** the process by which the Company adopts measures to understand, review, and evaluate stakeholders, its business, operations, products, and transaction volume. It also refers to the process of constant and periodic review and evaluation that must be carried out in accordance with the risks of corruption or transnational bribery to which it is exposed.
- **Enhanced Due Diligence:** the process by which the Company adopts additional and more intensive measures to understand its stakeholders, their business, operations, products, and transaction volume.
- **Terrorist financing:** A crime committed by any person who engages in any of the conduct described in Article 345 of the Criminal Code.
- **Financing of the Proliferation of Weapons of Mass Destruction or FPADM:** 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, transport, transfer, deposit, or dual use for illegitimate purposes in violation of national laws or international obligations, where applicable.
- **Risk matrix:** a tool that allows the identification, analysis, evaluation, treatment, and monitoring of risks associated with SAGRILAFT and PTEE to which the company may be exposed.
- **ML/TF/FPWMD:** Money Laundering, Terrorist Financing, and Financing the Proliferation of Weapons of Mass Destruction.
- **Money laundering:** A crime committed by any person who seeks to give the appearance of legality to property or money derived from any of the activities described in Article 323 of the Criminal Code.
- **Restrictive lists:** These are lists of individuals and entities associated with terrorist organizations that are binding on Colombia under Colombian law (Article 20 of Law 1121 of 2006) and in accordance with international law and any other list binding on Colombia (such as the United States of America's lists of terrorists, the European Union's list of terrorist organizations, and the European Union's list of persons classified as terrorists).
- **Risk factors:** These are the agents that generate SAGRILAFT or C/ST risk in the company, which must be taken into account to identify situations that may generate it in the operations, businesses, or contracts that are carried out.

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- **Compliance Officer:** company employee responsible for promoting, developing, and ensuring compliance with specific procedures for the prevention, updating, and mitigation of the risk of money laundering, terrorist financing, proliferation of weapons of mass destruction, fraud, corruption, bribery, violations of the Code of Ethics, transnational bribery, among others.
- **Unusual transaction:** A transaction whose amount or characteristics are not related to the ordinary or normal economic activity of the Company or which, due to its number, amount, or characteristics, does not fall within the normal guidelines or ordinary business practices.
- **Suspicious transaction:** An unusual transaction that, in addition, cannot be reasonably justified according to the customs and practices of the activity in question. It is one that, due to its number, amount, frequency, or characteristics of a particular industry or sector, leads to the presumption that its purpose may be to conceal, cover up, secure, safeguard, invest, acquire, transform, or transport goods or services derived from any criminal act, or when the transactions or funds linked to them are being given the appearance of legality.
- **Interested Parties:** Natural or legal persons with whom the company has commercial, business, contractual, or legal ties of any kind.
- **Politically Exposed Persons (PEPs):** public servants in any system of nomenclature and classification of jobs in the national and territorial public administration, when they are assigned or delegated functions of: issuing rules or regulations, general management, formulating institutional policies and adopting plans, programs, and projects, directly managing State assets, money, or securities, administering justice or administrative sanctioning powers, and individuals responsible for the management or handling of resources in political movements or parties.
- **Internal reports:** These are reports that are handled within the company and can be made by any employee or member of the organization who is aware of a possible unusual or suspicious transaction.
- **Suspicious transaction report (STR):** a report of a suspicious transaction that the company makes to the Financial Information and Analysis Unit (UIAF).
- **Transnational bribery:** The act by which a legal entity, through its employees, administrators, associates, suppliers, or subordinate companies, gives, offers, or promises a foreign public servant, directly or indirectly: (i) sums of money, (ii) valuable objects of pecuniary value, or (iii) any benefit or advantage in exchange for said public official performing, omitting, or delaying any act related to their duties and in connection with an international business or transaction.
- **International transactions:** business or transactions of any nature with foreign individuals or legal entities under public or private law.

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5. Roles and Responsibilities

Board of Directors

- Approve the SAGRILAFT and PTTE manual, policies, and procedures, as well as any modifications or additions thereto, leaving evidence in the corresponding minutes where the approval, modification, or addition is made.
- Define the profile and appoint the Chief Compliance Officer and Deputy Chief Compliance Officer in accordance with the qualities and requirements necessary to hold such a position, in accordance with the defined profile, ensuring suitability, experience, and leadership.
- Require compliance with SAGRILAFT and PTTE from the legal representative, Compliance Officer, and other employees.
- Review the SAGRILAFT and PTTE reports submitted by the legal representative to the Compliance Officer, internal audit, or statutory auditor, and make decisions regarding observations or recommendations.
- Verify the implementation of actions aimed at compliance with SAGRILAFT and PTTE.
- Ensure the resources to implement SAGRILAFT and PTTE.
- Establish guidelines and determine those responsible for the audit.
- Lead communication and disclosure strategies to stakeholders according to risk factors.
- Order appropriate actions against associates or collaborators in case of infringement.

Legal Representative

- Submit SAGRILAFT and PTTE to the Board of Directors for review and approval, as well as subsequent updates.
- Ensure that both the SAGRILAFT and the PTTE are aligned with the policies of the Board of Directors.
- Study the results of the risk assessment carried out by the Compliance Officer and establish the corresponding action plans.
- Allocate the resources required by the Compliance Officer to perform their duties.
- Verify that the Compliance Officer has the availability and capacity to perform his or her duties, supporting the design, direction, supervision, and monitoring carried out by both SAGRILAFT and the PTTE.
- Submit reports, requests, and alerts deemed relevant to the Board of Directors.
- Ensure that activities are properly documented so that the information meets criteria of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality.

Compliance Officer

Will be appointed by the Board of Directors and will be internally responsible for SAGRILAFT and PTTE.

- Ensure the effective, efficient, and timely compliance of SAGRILAFT and PTTE.

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- Submit reports to the Board of Directors at least once a year. At a minimum, the reports must contain an evaluation and analysis of the efficiency and effectiveness of SAGRILAFT and PTTE, proposing the respective improvements. Likewise, demonstrate the results of the Compliance Officer's management.
- Promote the adoption of corrective measures and updates to SAGRILAFT and PTTE when circumstances require it and at least once every two (2) years. To this end, proposals and justifications must be submitted to the Board of Directors.
- Establish internal investigation guidelines to detect non-compliance with SAGRILAFT, PTTE, and acts of corruption.
- Coordinate internal training and outreach programs.
- Evaluate reports submitted by internal audit and tax auditors.
- Verify compliance with the general and specific procedures it deems appropriate, as well as those of Due Diligence and Enhanced Due Diligence.
- Keep all documentary and magnetic evidence in reserve in relation to its work as support for compliance with any request from the judicial authority or control entity.
- Design methodologies for risk segmentation, identification, analysis, evaluation, and control, periodically verifying the implementation of measures.
- Report suspicious transactions and any other required reports or information to the Financial Information and Analysis Unit (UIAF).
- Verify compliance with established standards.
- Inform the legal representative of any failure that may occur in the controls established within the system, in order to leave evidence and traceability of the occurrence of any event.
- Ensure the implementation of channels that allow anyone to report breaches and possible suspicious activities confidentially and securely.
- Verify the application of the whistleblower protection policy and the harassment prevention policy in accordance with labor law.
- Respond to any request or proceeding from judicial or administrative authorities regarding the prevention and control of criminal activities.
- Address questions and concerns that arise among employees about matters related to SAGRILAFT and PTEE.

All Employees

- Be familiar with and comply with the manual, policies, procedures, and other aspects related to SAGRILAFT and PTEE.
- Report to the Compliance Officer any unusual or suspicious event or situation, warning sign, or event that compromises the company or its stakeholders and that may pose a risk of money laundering, terrorist financing, proliferation of weapons of mass destruction, fraud, corruption, bribery, transnational bribery, violations of the Code of Ethics, among others.

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Internal Audit

- Oversee SAGRILAFT and PTTE, ensuring that the Organization's operations are carried out in accordance with current regulations. At a minimum, these reviews shall be conducted annually. The results of the verifications carried out, together with the corresponding report, shall be submitted to the Compliance Officer and the Legal Representative.

Fiscal Audit

- Verify that the operations, businesses, and contracts entered into or fulfilled by the company comply with the manual and the approved policies and procedures.
- Report in writing to the Board of Directors, Legal Representative, and Compliance Officer on compliance or non-compliance with the provisions contained in this manual.

6. Policies

- All employees are directly responsible for ensuring the implementation, compliance, and treatment of SAGRILAFT and PTTE and the efficiency of the activities incorporated into their processes within the scope of their responsibilities.
- The company will maintain updated databases of its stakeholders with the respective authorization for due diligence processes and the management of risks corresponding to SAGRILAFT and PTTE. In addition, it will take the necessary measures to ensure that the information contained in these databases is complete and consistent with the supporting documentation.
- Conflicts of interest, incompatibilities, and disqualifications of the person responsible for performing the functions of SAGRILAFT and PTTE will be taken into account. In this regard, the statutory auditor or legal representative shall not be appointed as Compliance Officer.
- The company keeps and maintains records and accounts that accurately and precisely reflect all transactions carried out in order to prevent payment triangulation. Employees are prohibited from changing, omitting, or misrepresenting records to conceal improper activities or activities that do not correspond to the nature of the recorded transactions.
- The company is not permitted to carry out any type of transaction with virtual assets.
- The Compliance Manual must be available in Spanish and English, in accordance with the official languages of the countries where the company conducts business or international transactions on its own or through its subsidiaries.

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- Remuneration and commission payments for the performance of duties must be granted according to previously established criteria and duly documented by the company's commercial departments.
- The company does not promote or accept any act related to international trade crimes.

List Consultation Policy

The area responsible for hiring will consult the restrictive lists of interested parties before they join the company, whether they are natural persons or legal entities, using their name and identification document or company name, their principal legal representative, substitute legal representatives, and shareholders up to the final beneficiary, as stipulated in this manual in procedure number 7.

The company shall refrain from engaging any interested party that is reported on the restrictive lists consulted and shall be registered by the department in charge. If the company has obtained an OFAC license to be managed by the State, its engagement may be authorized, subject to prior authorization by the Compliance Officer.

The engagement of interested parties who do not fully complete the defined forms, cannot demonstrate the origin of their resources, whose commercial and financial references cannot be verified, who provide false information during the contractual relationship, who are included in restrictive lists, or who are linked to criminal investigations related to the risks mentioned in this manual will not be permitted.

No employee may authorize any transaction, purchase, service, or contract of any kind with individuals or companies appearing on the restrictive lists without the knowledge of the Compliance Officer and the authorization of the General Manager.

The restrictive lists consulted by the company must be updated whenever changes are made to them.

For interested parties already linked, the area in charge will carry out an annual consultation to detect whether any of them have been subsequently included, or immediately in the event of any update of information. Likewise, if the interested party is classified as high risk, the consultation must be carried out every six months or at the frequency indicated by the Compliance Officer in accordance with the identified risk.

High risk:

- Customer or supplier with nationality or residence in a 'high-risk country'.
- Customer or supplier who, being on the list of "Specially Designated Nationals and Blocked Persons" published by OFAC, has obtained a license from OFAC to be managed by the State.
- Politically exposed persons (PEPs) or legal entities with a PEP in their shareholding structure or as a beneficial owner.
- Other interested parties that, according to the matching analysis, are considered high risk.

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For all queries on restricted lists, the date and name of the person who made the query must be recorded.

Activity Verification Policy

The information provided by interested parties must be verified, including contact details and economic activity, as well as the information provided and its corresponding supporting documentation, in accordance with the procedures defined by the company. In cases where the parties are not acting on their own behalf and shareholding composition, and where there are indications or certainty that their identification is mandatory, they are not acting on their own behalf, the necessary information shall be collected in order to ascertain the identity of the persons on whose behalf they are acting. In the case of legal entities, reasonable measures shall be taken to ascertain both the legal representatives and the shareholding structure up to the ultimate beneficiary of the company.

Furthermore, legal entities or individuals associated with the following will not be accepted as customers, suppliers, or employees:

- Persons of dubious integrity or honesty, particularly those known to be linked to any type of crime.
- Persons whose business activities make it impossible to verify the legitimacy of their activities or the origin of their funds.
- Persons who refuse to provide the required information or documentation without the authorization of the General Manager.

Document Retention Policy

The information provided by interested parties must be recorded in documents that guarantee the integrity, timeliness, reliability, confidentiality, and availability of the information in order to carry out the due diligence process. Likewise, the supporting documents must be kept for ten (10) years, as provided by law, since they may be requested in the event of an investigation by the competent authorities. The destruction of these documents must be approved by the Compliance Officer.

Market Knowledge Policy

Information must be obtained on the usual characteristics of the market of potential customers and suppliers in order to compare them with the transactions carried out, which will make it possible to establish their normality or possible abnormality when compared with other transactions of a similar nature.

Any employee who detects a transaction with these characteristics shall refrain from executing the transaction and immediately report it to the Compliance Officer.

A risk analysis must be carried out prior to the launch of any service or product, the modification of its characteristics, the entry into a new market, and the opening of operations in new jurisdictions.

➤ **Segmentation**

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Elements shall be separated into homogeneous groups within themselves and heterogeneous groups between themselves, according to the particular characteristics of each, in order to determine the usual characteristics of transactions. The separation is based on the recognition of their significant differences. The following factors shall be adopted for the segmentation of stakeholders:

- Economic activity
- Geographic location
- Amount of transactions
- Products or services offered
- Experience in the sector.

Policy Knowledge and links to politically exposed persons (PEPs)

Business relationships with individuals who hold or have held important public positions or who, by virtue of their position, manage public resources or wield some degree of power, require stricter due diligence processes or intensified due diligence.

Public servants in any nomenclature and classification system of national and territorial public administration shall be considered PEPs when they are assigned or delegated functions such as: issuing rules or regulations, general management, formulating institutional policies and adopting plans, programs, and projects, directly managing State assets, money, or securities, administering justice or administrative sanctioning powers, and individuals responsible for the management or handling of resources in political movements or parties. (Decree 830 of 2021)

The following mechanisms will be used for identification as a PEP:

- ✓ Review of PEP lists.
- ✓ By declaration of the PEP itself, obtained during the hiring process.
- ✓ Interested parties for whom information is available regarding their ability to access public funds, obtained from any other source and defined at the discretion of the Compliance Officer.

PEP status will cease to apply at least two years after the cessation of the functions that confer this status. The company will carry out a risk analysis prior to onboarding when interested parties with PEP status are detected, and onboarding will be approved by the Compliance Officer.

Enhanced Due Diligence Policy

Stakeholders who represent a higher risk, such as PEPs; those located in non-cooperative countries and high-risk jurisdictions; and other stakeholders who, according to the matching analysis, are considered high risk, shall be subject to enhanced due diligence, whereby they are consulted and approval is obtained for the relationship or to continue the contractual relationship, reasonable measures are taken to establish the origin of the funds, and continuous and enhanced monitoring of the contractual relationship is carried out.

7. *ed Due Diligence Procedure*

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As a tool to prevent the risks associated with SAGRILAFT and PTEE, due diligence measures must be implemented using an approach based on materiality and characteristics, taking into account operations, products, contracts, countries of operation, and other specific characteristics according to the nature and size of the company.

To this end, the following information must be requested from interested parties when entering into business or contractual relationships, in addition to verifying that they do not appear on the defined lists, as part of the risk management carried out by the responsible areas. The information consulted in the lists will be incorporated into the documentation of the interested party. Likewise, all requested forms must be signed by the current Legal Representative of the interested party.

Interested parties created under the category of petty cash third party or payment made by credit card for online purchases, as well as customers created on online sales platforms, are exempt from completing the forms.

7.1 Know Your Customer

a. Customer identification:

All customers with whom contracts or agreements are entered into or with whom any type of commercial relationship is held must complete the Third Party Entry and Update Form, NS Credit Application, or Customer Knowledge/Due Diligence Form. The data recorded must be verified, retained, and updated in accordance with policies and procedures. The forms must contain at least the following information:

- First and last names or company name and identification number
- Country of residence
- First and last names and identification of legal representatives
- First and last names, identification numbers of shareholders up to ultimate beneficiaries with name and identification number
- Contact person and position held
- Economic activity
- Source of funds
- PEP Statement
- Membership in Associations and Guilds

The following must be requested as supporting documentation: Tax ID number no older than 6 months, Certificate of existence and legal representation no older than 30 days from date of issue, Copy of Legal Representative's identity document, Commercial references no older than 30 days. If the customer is from abroad, the equivalent documentation or necessary information will be collected and analyzed to validate the above information.

b. Verification on lists:

Domestic customers: The responsible area must consult restrictive lists for all customers before they join the company, whether they are natural persons or, in the case of legal entities, the

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principal legal representative, alternates, and shareholders up to the ultimate beneficiary who exceeds a 5% stake in the company. at <https://infolaftsearch.com> with their respective username and password, which will be provided via email by the Compliance Officer, leaving the record documented and attached to the customer's information.

Foreign customers: The responsible area must consult restrictive lists for all customers before they join the company, whether they are natural persons or, in the case of legal entities, legal representatives/general managers and shareholders up to the final beneficiary who exceeds a 5% stake in the company, at <https://infolaftsearch.com> with their respective username and password, which will be provided via email by the Compliance Officer, leaving the record documented and attached to the customer's information.

If the customer, legal representatives, shareholders, or ultimate beneficiaries appear on any of these lists, an email must be sent to the Compliance Officer (sarlaft@newstetic.com) with all their information, and the admission or business relationship will be suspended until the respective analyses have been carried out and, if required, approval has been obtained from the General Management.

c. Communication of alerts:

When, in the course of the business relationship, the customer carries out an unusual transaction or a red flag is identified, the area responsible for the customer must send an email to the Compliance Officer (sarlaft@newstetic.com) with a description of the situation, so that the Compliance Officer can carry out the corresponding analysis. If necessary, the area responsible will be asked to provide additional information.

d. Information analysis:

Once informed, the Compliance Officer will proceed to carry out a due diligence analysis of the unusual transaction or red flag in order to determine the risk and take the measures deemed necessary. If there is no reasonable justification for the warning sign, the explanation will be documented and the responsible area will be informed so that the relationship with the customer can continue. However, if there is justified evidence, the General Manager will be informed so that the appropriate measures can be taken depending on the type of business or customer.

7.2 Knowledge of suppliers

a. Supplier Identification:

All suppliers or contractors with whom contracts are entered into, or with whom any type of commercial relationship is held, must complete the National Supplier Knowledge or Foreign Supplier Knowledge form. The data recorded must be verified, stored, and updated in accordance with the policies and procedures of the responsible area.

- First and last names or company name and identification number

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- Country of residence
- First and last names and identification of legal representatives
- First and last names, identification of shareholders up to ultimate beneficiaries with name and identification number
- Contact person and position held
- Economic activity
- Source of funds
- PEP declaration
- Membership in associations and unions

The following must be requested as supporting documentation: Tax ID number no older than 6 months, Certificate of existence and legal representation no older than 30 days from date of issue, Copy of Legal Representative's identity document, Bank certification no older than 60 days, Commercial references (2), no older than 30 days. If the supplier is located outside the country, equivalent documentation or necessary information will be collected and analyzed to validate the above data.

b. Verification in lists:

Suppliers of Goods: The responsible area must consult all suppliers, before they join the company, whether they are natural persons or, in the case of legal entities, their principal legal representative, alternates, and shareholders up to the ultimate beneficiaries who exceed a 5% stake in the company, at <https://infolafsearch.com> with their respective username and password, which will be provided via email by the Compliance Officer, leaving the record documented and attached to the supplier's information. In the case of foreign suppliers (), equivalent documentation or whatever documentation can be collected from the supplier will be analyzed.

If the supplier, legal representatives, shareholders, or ultimate beneficiaries appear on any of these lists, an email must be sent to the Compliance Officer (sarlaft@newstetic.com) with all the information, and the entry or business relationship will be suspended until the respective analyses have been carried out and, if required, approval has been obtained from General Management.

Service providers: The responsible area must send an email to the Compliance Officer (sarlaft@newstetic.com) with the supplier's information before they join the company, whether they are a natural person or, in the case of a legal entity, their principal legal representative, alternates, and shareholders, including ultimate beneficiaries who exceed a 5% stake in the company if the amount of the initial or cumulative service contracted to the supplier exceeds 60 SMLMV. With this information, the Compliance Officer will consult restrictive lists and respond with the supporting documentation for the consultation, which must be kept in each supplier's file.

If the supplier, legal representatives, shareholders, or ultimate beneficiaries appear on any of these lists, the Compliance Officer will request the relevant information, perform the respective analysis, and inform the responsible area of the actions to be taken with said supplier. Admission or the business relationship will be suspended until the respective analyses have been performed and, if required, approval has been obtained from General Management.

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c. Communication of alerts:

When, in the course of the business relationship, the supplier carries out an unusual transaction or a warning sign is identified, an email must be sent to the Compliance Officer (sarlaft@newstetic.com) with a description of the situation so that the Compliance Officer can carry out the corresponding analysis. If necessary, additional information will be requested from the responsible area.

d. Analysis of information:

Once informed, the Compliance Officer will conduct a due diligence analysis of the unusual transaction or red flag in order to determine the risk and take the measures deemed necessary. If there is no reasonable justification for the warning sign, the explanation will be documented and the responsible area will be informed so that the relationship with the supplier can continue. However, if there is justified evidence, the General Manager will be informed so that the appropriate measures can be taken depending on the type of business or customer.

7.3 Employee knowledge

a. Employee Information:

All employees must comply with the selection process stipulated by human resources and complete the security protocol form. The data recorded must be verified, stored, and updated at least once a year or when significant changes occur.

a. List verification:

The responsible department must check all employees before they join the company at <https://infolaftsearch.com> using their respective username and password, which will be provided by email by the Compliance Officer, leaving the record documented and attached to the employee's information.

If the employee appears on any of these lists, an email must be sent to the Compliance Officer (sarlaft@newstetic.com) with all their information, and hiring will be suspended until the respective analyses have been carried out and approval has been obtained from General Management.

In the case of shareholders and members of the company's Board of Directors, the consultation will be carried out by the Compliance Officer, who will report the results directly to General Management.

b. Communication of alerts:

When, in the course of the employment relationship, an employee carries out an unusual transaction or a warning sign is identified, an email must be sent to the Compliance Officer (sarlaft@newstetic.com) with a description of the situation so that the Compliance Officer can carry out the corresponding analysis. If necessary, additional information will be requested from the responsible area.

c. Analysis of information:

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Once informed, the Compliance Officer will conduct a due diligence analysis of the unusual transaction or red flag in order to determine the risk and take the measures deemed necessary. If there is no reasonable justification for the warning sign, the explanation will be documented and the responsible area will be informed so that the relationship with the collaborator can continue. However, if there is justified evidence, the General Manager will be informed so that the appropriate measures can be taken, depending on the case.

8. Risk Management Methodology SAGRILAFT AND PTEE

The procedure for managing the risks of money laundering, terrorist financing, proliferation of weapons of mass destruction, fraud, corruption, bribery, transnational bribery, violations of the Code of Ethics, among others, is based on the ISO 31000 methodology, in accordance with the company's risk management procedure.

Context

Definition of internal and external variables related to the organization that provide the necessary elements to identify possible risk situations that must be managed to prevent their materialization.

- Establish the **external context** considering the social, environmental, cultural, political, legal, and regulatory situation at the international, regional, and local levels. Also consider economic and financial aspects, technological trends, and competition, identifying opportunities and threats.
- Establish the **internal context** taking into account factors such as corporate governance, organizational structure, roles and responsibilities, processes, policies, objectives, strategies, culture and values, availability of resources and knowledge, identifying strengths and weaknesses.

8.1 Identification

Identify the events or situations of risk associated with SAGRILAFT and PTEE, classifying risk factors according to economic activity, materiality, and the mechanisms necessary for adequate knowledge and identification. Regardless of size, activities, or relevant markets, identification allows for establishing the order and priority with which measures should be adopted to adequately mitigate risk. The following factors are taken into account:

- Country Risk:** refers to nations with high levels of perceived corruption, characterized, among other circumstances, by the absence of an independent and efficient administration of justice, a high number of public officials questioned for corrupt practices, the lack of effective rules to combat corruption, and the lack of transparent policies on public procurement and international investments.
- Economic sector risk:** review of the economic sector in which the interested party operates, as there are sectors with higher risk due to their condition and characteristics, for example, the mining and energy sector, public services, infrastructure works, the pharmaceutical and human health sector, among others, according to different references on the subject.

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c. **Third-party risks:** involves the participation of third parties, such as stakeholders and subsidiaries. The most frequent cases of corruption include the participation of contractors of high economic value, in which it is not easy to identify a legitimate object and their performance is not assessed at market values. The risk increases in countries that require intermediaries for the conclusion of an international business or transaction, in accordance with local customs and regulations. Consequently, the participation of a company in collaboration or risk-sharing contracts with contractors, or the fact that the latter are closely related to high-level government officials in a particular country, in the context of an international or local business or transaction.

8.2 Analysis

An analysis is performed for each of the risk events or situations that were previously identified.

- Source: What or who generates the risk?
- Causes: Why might it happen?
- Consequences: If it happens, what happens? What is the impact?
- Current preventive and corrective controls: What actions, controls, or measures are in place to reduce the frequency or impact?

8.3 Assessment (Measurement)

Risk events are rated according to two variables, probability or possibility and impact or severity. Multiplying these two aspects gives the risk level. With this assessment, each event is placed on the risk map and its criticality is defined. It also allows the risk to be viewed individually and collectively.

8.4 Treatment

The actions required to manage the identified critical risks are then defined. The options for treating risk, which are not mutually exclusive, are:

- ✓ **Eliminate or avoid the risk:** do not proceed with the activity or human resource that may generate the risk. This is always the first alternative to consider. This type of action completely eliminates the impact and probability of occurrence of the assessed risk.
- ✓ **Manage or mitigate the risk:** this consists of applying controls to reduce the probability of occurrence (prevention) of the risk and/or minimize its impact if it does occur (protection).
- ✓ **Transfer or share the risk:** this aims to distribute or transfer the risk to other parties (insurers, suppliers) and minimize its impact.
- ✓ **Accepting the risk:** this means accepting its consequences with knowledge and objectivity, and considering the criteria for accepting the risk. With this option, no action is taken to reduce the probability of occurrence or minimize the impact.

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8.5 Follow-up and Monitoring

Operations carried out with stakeholders must be monitored to detect possible unusual or suspicious operations (those that may be outside the market in which the company operates or the transactions it carries out) that may be related to money laundering, terrorist financing, proliferation of weapons of mass destruction, fraud, corruption, bribery, transnational bribery, violations of the Code of Ethics, among others, by continuously monitoring the risk profile.

Warning signs

These are facts, situations, events, amounts, quantitative and qualitative indicators, financial reasons, and other relevant information from which it can be inferred, either immediately or prospectively, that there may be a fact or situation that falls outside what the company determines to be normal.

- a) With regard to operations or activities with interested parties, related to:
 - Natural or legal persons who are not fully identified
 - Interested parties with criminal records
 - Interested parties that have been accepted without prior verification of the origin of their resources
- b) With regard to transactions, businesses, or contracts that represent, have as their object, or involve:
 - High volumes of cash without apparent justification
 - Movable or immovable property at prices considerably different from normal market prices
 - Donations that do not have an apparent final beneficiary, whose origin is unknown, or whose beneficiary is domiciled in a high-risk country or jurisdiction
 - Relevant transactions, business deals, or contracts that are not recorded in writing
 - Payments for transactions derived from international transfers from several senders to the same beneficiary, or from the same sender to several recipients, without an apparent relationship.
 - Transactions with subcontractors who have not been identified
 - Commercial transactions or business with persons included in binding lists
 - Transactions with interested parties domiciled in non-cooperative areas
 - Transactions involving products derived from illegal activities
 - Transactions involving products that have not been duly nationalized
 - Transactions with restricted-sale products that do not have the proper authorizations
- c) With regard to transactions involving cash originating from or related to:
 - Countries with high levels of corruption and political instability
 - Depositing cash into personal or company bank accounts from unexplained sources

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- Unjustified documentation regarding, or that does not correspond to, the origin or owner
- Amount, value, or currency inconsistent with the circumstances of the bearer
- Concealed transport of cash
- Clear security risk in the method of transport
- Transportation with high costs compared to alternative transportation methods
- Unexpected cash invoicing or sales in the economic sector
- Increase in cash invoicing or sales from unidentifiable customers
- Loans from abroad received in cash and in local currency

d) In the analysis of accounting records, transactions, or financial statements:

- Invoices that appear to be false or do not reflect the reality of a transaction or are inflated and contain excessive discounts or refunds.
- Foreign transactions with highly sophisticated contractual terms.
- Transfer of funds to countries considered tax havens.
- Transactions that have no logical, economic, or practical explanation.
- Transactions that are outside the ordinary course of business.
- Transactions in which the identity of the parties or the origin of the funds is unclear.
- Assets or rights included in the financial statements that have no real value or do not exist.

e) In the corporate structure or corporate purpose:

- Complex or international legal structures with no apparent commercial, legal, or tax benefits, or owning and controlling a legal entity with no commercial purpose, particularly if located abroad.
- Legal entities with structures involving domestic or foreign trusts, or non-profit foundations.
- Legal entities with offshore entity or offshore bank account structures.
- Non-operating companies under the terms of Law 1955 of 2019 or that, due to the development of their business, can be considered "paper" entities, i.e., that reasonably do not serve any commercial purpose.
- Companies declared as fictitious suppliers by the DIAN.
- Legal entities where the ultimate beneficial owner cannot be identified.

f) In the analysis of transactions or contracts:

- Frequent use of consulting and intermediation contracts and joint ventures.
- Contracts with contractors or state entities that give the appearance of legality but do not reflect specific contractual duties and obligations.
- Contracts with contractors that provide services to a single client.
- Unusual losses or gains in contracts with contractors or state entities, or significant changes without commercial justification.
- Contracts containing unreasonable variable remuneration or payments in cash, virtual assets, or in kind.

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- Payments to PEPs or persons close to PEPs.
- Payments to related parties (interested parties, subordinate companies, among others) without apparent justification.

8.6 Communication and Reporting of

The communication in good faith of information relating to activities related to the risks of money laundering, terrorist financing, proliferation of weapons of mass destruction, fraud, corruption, bribery, transnational bribery, violations of the Code of Ethics, among others, does not constitute a violation of the restrictions on disclosure of information imposed by contract or by any legal or regulatory provision, and does not imply any liability for the reporting person. Reports of any irregularities are confidential and anonymous through the following channels provided for this purpose:

- Ethics mailbox: a physical mailbox located permanently at the main headquarters, visible to all employees who wish to leave their reports anonymously.
- Ethics hotline (calls and WhatsApp): 318 382 85 35
- Website: www.newstetic.com
- Ethics email: somoseticos@newstetic.com
- Unusual or suspicious operations or warning signs via email (sarlaft@newstetic.com)

The Compliance Officer will contact the area responsible for unusual transactions and request the information necessary to clarify the situation. Unusual transactions will become suspicious if the Compliance Officer considers them to be so, as they were unable to reasonably justify the change detected. In all cases, a report will be left detailing the activities carried out, the documentation received, and the conclusions and decisions that were made. The Compliance Officer will guarantee the confidentiality of this information.

The actions that may be taken as a result of investigations initiated on the basis of suspicion shall not be disclosed to the parties concerned. Such actions shall be evaluated in accordance with the principles of confidentiality, integrity, transparency, and objectivity, and shall be handled in a timely manner within the company. Failure to comply with this duty of confidentiality may result in penalties as specified in the criminal code.

SAGRILAFT Report

Reports to the UIAF shall be made by the Compliance Officer, in the manner and through the electronic means enabled by the UIAF (SiRel) or, failing that, by email. Once the UIAF acknowledges receipt, indicating the number assigned to the communication, it will be filed. The following reports must be sent monthly to the UIAF, within the first 5 business days of each month:

- **Suspicious transaction report (STR):** In cases where there are transactions that are subject to reporting, the chief or deputy Compliance Officer, once the suspicious transaction has been determined, shall report it to the UIAF through the Online Reporting System. Depending on the case, the time of submission shall be defined according to the situation. It is not necessary to be certain that a crime has been committed or that the funds involved

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come from illegal activities, only that the transaction is considered suspicious. This does not constitute a criminal complaint.

- **Cash transaction report:** All transactions carried out in the ordinary course of business involving payments by delivery or receipt of cash (banknotes or coins) for an amount equal to or greater than ten million pesos (\$10,000,000) m/cte or its equivalent in other currencies.

If no suspicious transactions or individual cash transactions have been identified in the respective month (absence of transactions), the Compliance Officer shall report this fact.

In the event that any property, asset, product, fund, or ownership right is identified or verified in the name of or under the administration or control of any country, person, or entity included in these Binding Lists, the Compliance Officer shall immediately report it to the UIAF and bring it to the attention of the Attorney General's Office. The information shall be sent to the UIAF via email to cumplimientoagf67@uiaf.gov.co.

PTEE Report

- **Report of allegations of transnational bribery to the Superintendency of Companies and acts of corruption to the Secretary of Transparency:** channel for reporting transnational bribery https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-de-Denuncias-Soborno-Internacional.aspx and channel for reporting acts of corruption <http://www.secretariatransparencia.gov.co/observatorio-anticorrucion/portal-anticorrucion>

9. Training

The Compliance Officer must design, schedule, and coordinate training plans on SAGRILAFT and PTEE for all stakeholders in order to raise awareness of the risks associated with them. Similarly, training should be provided during the induction process for new employees, and if a position is considered critical with direct responsibility for risk mitigation controls, additional training should be provided.

Training programs must be designed to be delivered at least annually, and a record must be kept of the training provided.

Disclosure to stakeholders should reflect the obligations of managers related to the risks of money laundering, terrorist financing, proliferation of weapons of mass destruction, fraud, corruption, bribery, transnational bribery, violations of the Code of Ethics, among others, as well as procedures, policies, responsibilities, warning signs, reporting channels, and information regarding sanctions.

10. Code of Ethics

Defines standards of behavior and guides the conduct of the company and its subordinates so as not to engage in improper acts that violate the organization's ethics and transparency.

- Ethical Principles

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- Conflicts of interest
- Prevention of corruption and bribery
- Prevention of money laundering, fraud, terrorist financing, and proliferation of weapons of mass destruction
- Gifts and hospitality
- Donations and sponsorships
- Political contributions of any kind
- Protection and use of company resources
- Handling, security, and confidentiality of information
- Care for the environment
- Respect for free competition
- Accounting integrity
- Complaint, investigation, and resolution process

11. Sanctions

- I. Failure to comply with the provisions by not adopting or applying the control mechanisms will result in the imposition of administrative sanctions, without prejudice to any criminal consequences that may apply.
- II. Failure to comply with or violation of SAGRILAFT and PTEE policies and regulations by employees constitutes serious misconduct. Consequently, where applicable, the procedures and penalties established by the Internal Work Regulations will be applied.

12. SAGRILAFT and PTEE Updates

Updates to the Compliance Manual for SAGRILAFT and PTEE must be made whenever there are changes in the company's activities that modify the risk, changes in applicable regulations, when circumstances require it, or at least every two (2) years. The purpose of this is to ensure efficient, effective, and timely operation that facilitates compliance with the company's strategy and objectives.

13. Deadline

If the company ceases to meet the requirements for mandatory implementation of SAGRILAFT and PTEE on December 31 of any year, it must continue to comply with the requirements for a minimum period of three (3) years from that date and must report this in writing to the Superintendence of Companies within one month of the date on which such circumstance occurs.

14. Related documents

- PLRIPR-001 Risk Management Procedure
- DEGEMT-002 Stakeholder Matrix

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- COGEPR-001 Procurement and Contracting Procedure
- MVGEPR-020 Portfolio Policies and Procedures
- GHGEPR-001 Human Resources Management Procedure
- GHSFPR-001 Corruption and Bribery Risk Prevention Program

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