

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.

CONTENTO BPS S.A. is a Colombian company monitored by the 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 these risks and provides the Senior Management of Contento BPS SA with reasonable security about its compliance.

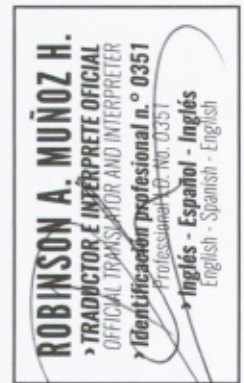
The main objective of this policy is to devise guidelines for preventing and controlling the risks of ML/TF/FPWMD and transnational corruption and bribery (TC/B) to minimize the possibility (through the different activities carried out by the Company in the development of its operations) that these resources may be channeled through the company. This could be a mechanism for concealment, handling, 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 CONTENTO BPS S.A.:

- 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, 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 counterparts' segmentation processes on 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 or 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.



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Yo, Robinson A. Muñoz H., traductor oficial con identificación profesional n.º 0351, otorgada por la Universidad Nacional de Colombia, el 10 de agosto de 2012, por medio de la presente certifico que he traducido el documento anterior. Adicionalmente certifico que, según mi conocimiento, esta es una traducción verdadera y correcta del(los) documento(s) en inglés adjunto(s).

I, Robinson A. Muñoz H., Official Translator with Professional I.D. No. 0351, granted by Universidad Nacional de Colombia on August 10, 2012, hereby certify that I have translated the above document. I further certify, to the best of my knowledge, that this is a true and accurate translation of the attached document(s) in Spanish.



# TRADUCCIÓN OFICIAL

## OFFICIAL TRANSLATION

Elizabeth  
Apata Mesa  
NOTARIA

Folio número:  
/Folio number:



- Information of its counterparties will only be disclosed at the express and formal request of the competent authorities.
- Publicly censoring any internal 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:

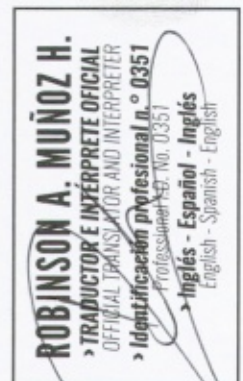
- If you have information or knowledge of activities that may involve Contento BPS SA or any of its counterparties (Stakeholders, Employees, Shareholders or Suppliers) and that may result in money laundering activities, terrorism financing, corruption, bribery, transnational bribery, or any other conduct 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@contentobps.com](mailto:oficialdecumplimiento@contentobps.com) or to our Ethics Department, email: [lineaetica@contentobps.com](mailto:lineaetica@contentobps.com). These reports will be confidential.
- In addition, the Superintendence of Companies has set up a hotline for complaints, which can be accessed from the entity's website ([supersociedades.gov.co](http://supersociedades.gov.co)).

Finally, we recommend reading the full Spanish version of both Sagrilajt and Compliance (PTEE) manuals for a better understanding, which are published on our website.

Sincerely,

LEGAL REPRESENTATIVE

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**FIRMA REGISTRADA**

Verificación Biométrica Decreto-Ley 019 de 2012

A la Notaría Diecisiete del Circulo de Medellín se presentó:

**MUÑOZ HENAO ROBINSON ALBEIRO**

quien presentó su **C.C. 3383477**

Y manifestó que esta es su firma, la que siempre usa en sus actos públicos y privados.

Medellín, 2024-06-18 11:27:37



*Elizabeth Zapata*

Cod. omixj  
7847-78367151

**ELIZABETH ZAPATA MESA**  
**NOTARIA 17 DEL CÍRCULO DE MEDELLÍN**

