

# **POLICIES OF THE SELF-CONTROL SYSTEM AND INTEGRAL RISK MANAGEMENT OF MONEY LAUNDERING, TERRORIST FINANCING, AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION - SAGRILAFT**

## **General Policies.**

The Board of Directors and Company Administrators, in compliance with the risk management system, establish guidelines to prevent crimes associated with Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction (LA/FT/FPADM), as well as other associated crimes that may jeopardize the good name, image, and reputation of the Company, and potentially affect commercial and contractual relationships.

- ✓ The Company has a methodology and procedures for the Management of LA/FT/FPADM Risk, which allow for the identification, measurement, control, and monitoring of inherent and residual risks that may affect the Company.
- ✓ Maintain an ongoing Training Program based on the regulations and development of SAGRILAFT.
- ✓ The Corporate Transparency and Ethics Program includes principles, business practices, employee conduct, including the requirement for officials to comply with SAGRILAFT regulations to achieve commercial goals, confidentiality, and sanctions for non-compliance.
- ✓ Commercial negotiations will not take precedence over compliance with the policies and guidelines defined for the administration of Money Laundering and Terrorism Financing risk in this manual.
- ✓ Mechanisms will be adopted to preserve documentary information on associates, movements of incoming and outgoing resources, reports to the UIAF, reports prepared by the Compliance Officer, the external audit, and other information generated in the execution of SAGRILAFT.
- ✓ Report to the Financial Information and Analysis Unit (UIAF) operations determined as suspicious of Money Laundering and Terrorism Financing, as well as cash transactions.
- ✓ Information regarding attempted or suspicious operations related to Money Laundering and Terrorism Financing will be treated with strict confidentiality. Therefore, the name or identity of individuals whose behavior has led to the generation of the report cannot be disclosed.
- ✓ Conduct due diligence on any natural or legal person who enters into a contractual or legal relationship (Clients, Employees, Suppliers, Partners, Contractors).
- ✓ Any operation in which the Company is involved must have internal and/or external documentation clearly explaining the nature of the operations, the date, and the approvals granted in accordance with the policies and procedures established for each area and process of the Company.
- ✓ The Company will refrain from entering relationships with Clients, Employees, Suppliers, Partners, and other related parties listed on binding and restrictive lists, following a proper evaluation.
- ✓ Employees must immediately report any unusual or suspicious operation they identify during their daily activities to the Compliance Officer.
- ✓ Employees and/or third parties with any relationship with the Company undertake the commitment and responsibility to promptly address requests made by the Compliance Officer.
- ✓ Any situation or inquiry regarding a potential conflict of interest must be reported to the immediate superior, who will then refer it to the authority responsible for resolving this conflict.

## **Knowledge Policy**

To minimize the Company's risk tolerance and prevent its involvement in Money Laundering, Terrorism Financing, and Financing the Proliferation of Weapons of Mass Destruction (LA/FT/FPADM) operations, this policy aims to establish guidelines related to procedures, organizational structure, control bodies, information reporting, and stakeholder training.

## **Conflict of Interest Management**

The Company, aware that conflict of interest is a situation where individuals prioritize their personal or professional interests, directing their decisions for their own benefit or that of a third party, conflicting with the responsibilities of the position held, hereby defines the following policies:

- ✓ Commercial negotiations will not take precedence over compliance with the policies and guidelines defined for the management of LA/FT/FPADM risk in this manual.
- ✓ Any situation or inquiry regarding a potential conflict of interest must be reported to the immediate superior, who will then escalate it to management to evaluate and suggest the respective recommendations.

# **POLICIES OF THE CORPORATE TRANSPARENCY AND BUSINESS ETHICS PROGRAM - PTEE**

## **Policies**

Employees who act contrary to the provisions of the PTEE will be subject to sanctions in accordance with the Internal Work Regulations, without prejudice to what is established in local laws, and must prioritize compliance with the established rules for the prevention of Corruption and Transnational Bribery risks.

## **General Policies**

The PTEE compiles all regulations regarding the prevention and mitigation of Corruption and Transnational Bribery Risks, as well as the ethical principles and values that the company adheres to, to conduct its business in an ethical and transparent manner.

- ✓ The Company rejects and refrains from participating in acts of Corruption, including transnational bribery.
- ✓ Implements necessary mechanisms to combat and fight against corruption and other criminal acts related to transnational bribery.
- ✓ Promotes within the Company an institutional culture of anti-corruption and Business Ethics.
- ✓ Establishes rules of conduct to prevent the occurrence of any act of Corruption derived from the giving and receiving of gifts, money, or favors.
- ✓ Timely evaluates and manages all received reports and adopts a non-retaliation policy against whistleblowers of alleged acts of corruption.
- ✓ Maintains appropriate channels to facilitate communication if situations of corruption and other criminal acts occur.
- ✓ The Company has an Ethics Hotline through which reports of non-compliance with the provisions of this policy and other related documents are received.
- ✓ The Company, along with the Compliance Officer, promptly manages all reports of acts related to Corruption, regardless of their amount or the personnel involved.

## **Specific Policies**

- ✓ It is prohibited to authorize, deliver, offer, or promise any object of value directly or indirectly to our counterparts or third parties involved with the company.
- ✓ No Company official may benefit, in private purchases made from business partners or suppliers, from discounts or advantageous conditions that exceed the general conditions that apply generally.
- ✓ Offering or promising any donation or economic contribution on behalf of the Company is prohibited unless the funds are destined for recognized humanitarian causes. These donations must be authorized by the presidency.
- ✓ The Company will not, under any circumstances, make contributions of any kind for the financing or promotion of political campaigns or parties.
- ✓ The Company does not accept the use of privileged information and rejects all types of practices restricting competition.

## **Gifts, Hospitality, and Entertainment: General Rules**

Gifts, Hospitality, and Entertainment may only be offered or accepted when the following conditions are met:

- ✓ Compliance with applicable national regulations, including those governing transparency, gifts, and hospitality in the pharmaceutical industry, must be ensured.

- ✓ The value and frequency of the gift, hospitality, or entertainment are reasonable and balanced in the context of customary business practices.
- ✓ The gift, hospitality, or entertainment does not create any undue influence or the appearance of undue influence.

In specific cases, gifts, hospitality, or entertainment may exceed the limits if all other conditions are met. These cases must be exceptional and require prior formal authorization (e.g., via email) from the general manager. In all cases, you must inform your supervisor that you have been offered or received a gift, hospitality, or entertainment.

### **Offering gifts, hospitality, and entertainment to public officials.**

Employees may not offer gifts, hospitality, or entertainment to public officials unless their value is not significant.

### **Conflict of Interest**

A conflict of interest is any situation in which a person's direct or indirect personal interests may conflict with those of the Company or interfere with their duties, leading to actions contrary to the proper fulfillment of their job obligations. These situations, in which personal interests are opposed to organizational interests, can lead to personal, commercial, political, or economic benefit to one party, which may harm the other.