
	INTEGRATED MANAGEMENT SYSTEM	SIGDEI-0751 Version 5
	POLICY TO MANAGE THE RISK OF MONEY LAUNDERING, TERRORISM FINANCING AND FINANCING THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION - ML/TF/FPWMD	March 2026
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POLICY TO MANAGE THE RISK OF MONEY LAUNDERING, TERRORISM FINANCING AND FINANCING THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION - ML/TF/FPWMD

CODE: SIGDEI-0751

In developing this Policy, the Company declares the following guidelines:

- Comply with the applicable regulations in force regarding the prevention of ML/TF/FPWMD, ensuring the implementation, supervision and continuous improvement of the system.
- Appoint a Compliance Officer (Principal and Alternate) and allocate the necessary human, technical, financial and operational resources for the proper performance of their duties.
- To direct the Company's efforts towards preventing and managing the risk of ML/TF/FPWMD through the design and implementation of a system aligned with the legal framework.
- Promote an organizational culture of zero tolerance towards any activity that may facilitate ML/TF/FPWMD.
- Establish mandatory ML/TF/FPWMD prevention guidelines for all Company employees.
- Define a methodology for the identification, measurement, control and monitoring of the risk of ML/TF/FPWMD.
- Implement due diligence policies and procedures that allow for adequate knowledge of counterparties and the market, in order to detect and report unusual, attempted and/or suspicious transactions.
- Consolidate an organizational structure for the management of ML/TF/FPWMD risk, headed by the President of the Company.
- Avoid, in accordance with best business practices, ties with employees, suppliers and contractors that are included in binding lists or the OFAC list; empowering the Compliance Officer to request the termination of such relationships in the event of any deviation.
- Actively collaborate with the competent authorities, providing the required information within the framework of investigations related to ML/TF/FPWMD crimes.
- Submit to the approval of the highest governing body and/or by the President of the Company who have been designated by the same body, the decision to assume specific ML/TF/FPWMD risks when circumstances warrant it.
- Ensure that the administrative and control bodies, the compliance officer, and each employee observe compliance with the policies and regulatory framework applicable to the prevention of ML/TF/FPWMD.
- Respect the legal confidentiality of information, prohibiting any employee from disclosing data on suspicious transactions reported to the Financial Information and Analysis Unit (UIAF), a task that corresponds exclusively to the Compliance Officer.

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- To safeguard the confidentiality of information and documents related to the administration of the system by the Company's employees.
- Mandatory attendance at scheduled training sessions on the subject, regardless of hierarchical level or position held.
- To fully comply with this Policy and internal regulations related to the prevention of ML/TF/FPWMD. Understanding that non-compliance will result in disciplinary sanctions as provided for in the Internal Work Regulations and the Code of Conduct.