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1. OBJECTIVE

To describe the methodology to identify, assess, control and mitigate the occurrence of the ML/TF (Money Laundering and Terrorist Financing) risks of the Company.

2. DEFINITIONS

Shareholders: the persons that hold shares in the Company in accordance with Deceval's register.

Allies: legal or individuals with which the Company enters into a collaboration agreement, including, among others, joint ventures, joint accounts, consortiums, temporary associations, etc.

Managers: the legal representative, the liquidator, the factor, the members of boards of directors and any other person who according to the bylaws exercises or holds these duties or positions in the Company.

Candidates: the candidates to fill a vacant position in the Company, in relation to which the selection process has been completed, being the most appropriate person for a particular position and for which the ML/TF Verification is pending.

Buying Customers: customers who buy from the Company any of the products (rock aggregates and the like) that the Company extracts from the different sources of materials it exploits.

Customer: the public or private entity with whom which Construcciones El Condor S.A. intends to enter into an agreement.


Company: Construcciones el Condor S.A.

Counterparty: the natural or legal person with which the Company holds contractual, business, commercial or legal links. The Counterparties include public and private sector customers, service Providers, Suppliers of goods and inputs, the Shareholders of the company, partners or Allies in projects and/ or concessions, subordinate companies, affiliate companies, the collaborators of Construcciones El Condor, the Candidates and the Managers of the Parent Company and Subordinates.

Contractor: in the context of a national or international business or transaction, any third party that provides services to the Group, the Parent Company or its subordinates, which holds a contractual legal relationship of any nature with them. The Contractors may include, but not be limited to, Suppliers, intermediaries, agents, distributors, consultants and advisors.

Due Diligence: a review of the legal, accounting, financial and reputational aspects of the Partners or Allies related to a national or international business or transaction, with the purpose of assessing and identifying the risks that may threaten the Risk Management Policy.

Addressees: the persons to whom this procedure is applicable, i.e. the Collaborators of Construcciones El Condor, Shareholders, Managers, Contractors, Allies and Buying Customers

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of the Company and all persons who, by reason of their position or activity, have any relationship with the Company.

Employee: the individual of a strategic, tactical, or support level who is required to provide a personal service under the Company's subordination, in return for a consideration.

Compliance Officer: the Risk Management Director, who is responsible for verifying the adequate and timely compliance with the **ML/TF Risk Management** procedure in the Company.


Terrorist Financing: a concept that encompasses the financing of acts of terrorism, terrorists and terrorist organizations in accordance with article 345 of the Criminal Code.

Risk Management: processes, measures, structures and methodologies aimed at preventing and controlling the ML/TF risk.

Money Laundering: the crime of Money Laundering consists of trying to give the appearance of legality to proceeds from legal activities, as established in article 323 of the Colombian Criminal Code.

Anti-Corruption, Money Laundering and Terrorism Financing Laws: (a) the title of "crimes against public administration" (currently included in title XV, chapters I to XII of the Colombian Criminal Code), the chapter on money laundering (currently included in title X, chapter V of the Colombian Criminal Code), and the article on the financing of terrorism (currently included in article 345 of the Colombian Criminal Code) established in the Criminal Code, as amended, replaced or supplemented from time to time; (b) Laws 80/ 1993, 734/ 2002, 1474/ 2011, 1453/ 2011, 1778/ 2016; (c) the UK Bribery Act of 2010; (d) the United States Foreign Corrupt Practices Act of 1977, (e) the United States Financial Recordkeeping and Reporting of Currency and Foreign Transactions Act of 1970, (f) the PATRIOT Act of the United States, and any other Applicable Law related to any of the foregoing regulations, (g) the U.S. Money Laundering Control Act of 1986; (h) the Convention on the Laundering, Detection, Seizure and Confiscation of the Proceeds from Crime, ratified and approved by Colombia by means of Law 1017/ 2006; (i) the Model Regulations Concerning Money Laundering Offenses Related to Illicit Drug Trafficking and Other Serious Offenses prepared by the Inter-American Drug Abuse Control Commission; (j) the International Convention for the Suppression of the Financing of Terrorism, ratified by Colombia by means of Law 808/ 2003; (k) the Inter-American Convention against Terrorism, ratified and approved by Colombia by means of Law 1108/ 2006; (l) the United Nations Convention against Transnational Organized Crime, ratified by Colombia by means of Law 800/ 2003; (m) the United Nations Convention against Corruption, ratified and approved by Colombia by means of Law 970/ 2005; (n) the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, ratified by Colombia by means of Law 67/ 1993.

Restrictive Lists: the lists in respect of which the Company will refrain from or seek to end legal or other relationships with the individuals or legal entities appearing therein. This includes United Nations lists, OFAC lists, and other lists that due to their very nature generate a high risk that cannot be mitigated by the adoption of controls, such as (a) the "Specially Designated Nationals and Blocked Persons List" of the U.S. Department of the Treasury, (b) the "Consolidated List of Financial Stations Targets" and the "Investment Ban List", (c) any publicly available list associated with designated or sanctioned individuals or legal entities drawn up by the United States, the

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United Kingdom or the European Union, or any other present or future member state thereof, or by Colombia, each as amended, supplemented or replaced from time to time.

Binding Lists: list of persons or entities that are associated with terrorist organizations or criminal activities. This type of lists are mandatory due to their binding nature. To date, the only binding list for Colombia under the international law is that issued by the United Nations Security Council under resolution 1267/ 1999.

ML/TF Risk Matrix: the matrix used to identify current and potential risks, to assess them in terms of probability of occurrence and economic and non-economic (legal and reputational) impacts and to define the mitigation plans for each one of them.

Unusual Operations: operations carried out by Counterparties, which, due to their number, quantity or characteristics, do not fall within the normal systems and practices of the construction of civil works.

Suspicious Operations: unusual operations that the Compliance Officer decides to report to the UIAF.

Risk Management Policy: the general policy adopted by the Board of Directors of the Company in meeting No. 277 of April 24, 2017 and the amendments made thereto from time to time by the same Board of Directors, containing the principles and guidelines for the conduct of business in an ethical, transparent and honest manner and for the identification, assessment, control and mitigation of the occurrence of risk events at corporate level, in projects and Subordinated companies. The risks managed include strategic and operational risks, risks to business ethics including corruption and bribery events, money laundering and terrorist financing (ML/TF) risks and business continuity risks, as well as the changes thereto to be adopted from time to time.

Supplier or Provider: any person who has a contractual or commercial relationship, and who provides the Company with goods and supplies, services for the performance of works or for the provision of services, Providers of land, transportation; among others.


Suspicious Operations Report UIAF - ROS: the reports that the Company may submit to the Information and Financial Analysis Unit (UIAF) of all Suspicious Operations detected in the ordinary course of its business or activities.

PEPs: abbreviation for "Publicly Exposed Persons". National or foreign persons who due to their profile or the functions they perform may expose the Company to a greater extent to the risk of ML/TF, such as: individuals who by reason of their position manage public resources or hold some degree of public power.

Due Diligence Procedure: the procedure that regulates the performance of Due Diligence in its different modalities.

Case and Investigation Management Procedure: a procedure to investigate arguments and document responses to complaints, including the disciplinary or corrective actions taken.

Legal Risk: the possibility of loss incurred by the Company when sanctioned, fined or obligated

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to indemnify damages as a result of the non-compliance with rules, regulations and/ or contractual obligations.

Operational Risk: the possibility of incurring in economic losses due to deficiencies, failures or inadequacies in human resources, the implementation of techniques, infrastructure, technology or the occurrence of external events.

Reputational Risk: the possibility that the corporate name and image of the Company is damaged, by negative publicity, causing a loss of customers, bad image, decrease of income, in addition to expenses related to judicial processes.

Warning Signals: facts, situations, events, amounts or relevant financial indicators from which the existence of a suspicious transaction can be inferred (Annex 2).

Subordinate: it has the meaning specified in article 260 of the Commercial Code.


UIAF: Information and Financial Analysis Unit of the Ministry of Finance and Public Credit.

Comprehensive Risk Verification: a verification that includes all aspects of the ML/TF verification, in addition to consultations with the attorney general's office and consultations with all individuals and legal entities included in the certificate of existence and legal representation.

ML/TF Verification: the analysis, processing and validation of relevant information of the Counterparties, from which risk factors that must be considered for decision making can be evidenced, related to money laundering, terrorist financing, illicit activities, among others. This component includes identity the cross-checking of information sources (national and international) by document number and by homonymy for individuals and/ or legal entities, which will allow evaluating the existence of Operational, Legal and Reputational Risks.

3. REFERENCE DOCUMENTS

- Risk Management Policy.
- Code of Business Ethics.
- Ethics Line Policy.
- Case and Investigation Management Procedure.
- Due Diligence Procedure.
- Logistics Procedure.
- Recruitment Procedure.
- Property Management Procedure.

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4. APPLICATION

This procedure applies to all activities and processes of the Company that represent or may represent ML/TF risks for it, and compliance therewith by Addressees will be mandatory.

5. METHODOLOGY

5.1 ROLES AND RESPONSIBILITIES

5.1.1 Board of Directors

ML/TF Risk Management Procedure: to review and approve ML/TF prevention and control guidelines.

5.1.2 Audit and Risk Management Committee

ML/TF Risk Management Procedures: to review it.

- **Regulatory compliance and ML/TF:** to monitor compliance.
- **Reports:** to make formal statements regarding the items contained in the report submitted by the Compliance Officer, among other aspects related to the implementation, development and progress of the **ML/TF Risk Management** procedure.


5.1.3 Executive or Corporate President

- **ML/TF Risk Management Procedure:** to approve the supply of the technological, human and physical resources necessary for the implementation of the procedure.
- To Provide effective, efficient and timely support to the Compliance Officer in decision-making.
- To verify that the procedure in place complies with the guidelines established by the Board of Directors.

5.1.4 Risk Management Committee (Internal)

- **ML/TF Risk Management Procedures:** to review and submit it for review and approval by the audit committee and board of directors, respectively.
- **ML/TF Risk Reports:** to review ML/TF risk management risk reports to make decisions based on such information.

5.1.5 Compliance Officer (Risk Management Director)

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- ML/TF Risk Management Procedure:** to design and propose it to the Internal Committee; to ensure the proper observance thereof; to submit reports, in person and in writing, to the Audit and Risk Management Committee regarding the implementation, development and progress of the ML/TF Risk Management procedure, at least once every six months; to promote the adoption of corrective measures; to train the collaborators of Construcciones El Condor or to designate the person who will carry out the training on the ML/TF Risk Management procedure; to coordinate the disclosure of the process and its modifications to the Addresses; to perform periodic monitoring on the ML/TF residual risk profile; to verify that the identification processes of Addresses are carried out; to request the ML/TF Verification of Counterparties and other determinant persons in Restrictive Lists; to endeavor for a similar ML/TF procedure to be implemented in the Subordinates.
- Unusual Operations:** to identify and analyze any Unusual Operations identified or reported and carry out the relevant analysis in order to report it or not to the UIAF as a Suspicious Operation. In any case, the Compliance Officer will provide assistance to the Collaborators of Construcciones El Condor in relation to this topic.
- Reports:** to generate and maintain historical records of the ML/TF Risk Validation Reports, the **Comprehensive Risk Validation Report**, the **Unusual Operations Report** and **Warning Signals**, through the Ethical line or other channels, and the **Suspicious Operations Report** to the UIAF.

Others:

- To evaluate the reports submitted by the internal auditor or by the person who performs similar functions or may replace the internal auditor, and to take appropriate measures against the deficiencies informed.
- To retain the documentation that must be kept in the exercise of his/ her functions.
- To maintain confidentiality of the information known in instances of his/ her duties regarding the prevention of the ML/TF risk.
- To submit reports to the UIAF, if necessary, in accordance with the current regulations.
- To ensure through annual verifications that the information procedure of Counterparties defined by the Company is fulfilled.
- To validate that the Company's residual risk is in line with the Company's risk appetite at least one (1) time per year.
- To address the requirements or recommendations made by control entities, members of the board of directors or internal control bodies, for the proper fulfillment of the **ML/TF Risk Management** procedure.

5.1.6 Internal Audit performed by external auditors

ML/TF Risk Management Procedure: To evaluate its effectiveness and determine the aspects

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to be improved and document the results found and submit them to the Audit and Risk Management Committee.

5.1.7 Members of the Board of Directors of Subordinates


To approve the implementation of a ML/TF risk management procedure comparable with that presented herein, in the respective Subordinated companies.

5.1.8 Process Leaders

- To report to the Compliance Officer, through the Ethics Line or other channels that may be appropriate according to the **Case and Investigation Management** procedure, any Unusual Operations and Warning Signals that may be detected by process leaders or detected the personnel under their responsibility based on **Annex 2 - ML/TF Warning Signals**.
- To provide assistance to the Collaborators of Construcciones El Condor under their responsibility regarding the implementation of the **ML/TF Risk Management** procedure adopted by the Company.
- To maintain confidentiality in relation to the Unusual Operations and Warning Signs of which they have knowledge.

5.1.9 All Collaborators of Construcciones El Condor

- To know the **ML/TF Risk Management** procedure.
- To report the risks related to ML/TF identified by the process leader.
- To favor the implementation of the **ML/TF Risk Management** procedure adopted by the Company.
- To report the Unusual Operations detected to their process leader.
- To attend to the trainings scheduled on ML/TF topics.
- To address the requirements and requests made by the Compliance Officer.
- To inform their process leader in the event of any conflict of interest in a control or procedure associated with ML/TF.
- To refrain from informing the Counterparties of the causes that gave rise to the control implemented.
- To give priority to the fulfillment of ML/TF prevention and control regulations over the particular interests of their process and over their personal interests.

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- To keep confidentiality in relation to Unusual Operations and Warning Signals of which they may be aware.
- To know and comply with the **Code of Business Ethics**.

5.2 GUIDELINES


The following guidelines set out the Company's view regarding Money Laundering and Terrorist Financing:

- The Company has a zero tolerance policy towards any legal conduct, including money laundering and terrorist financing.
- The Company will implement the controls necessary (to be monitored periodically) to prevent it being used as an instrument for the concealment or legalization of proceeds from criminal conducts or from those associated with the materialization of unlawful acts.
- The necessary controls will be carried out in relation to all the Counterparties and no process will be carried out without the fulfillment of the requirements demanded therefor.
- The collaborators of Construcciones El Condor will be trained and/ or informed, according to their level of exposure and engagement with the Counterparty, in order to build the organizational culture.
- To collaborate with competent authorities through the delivery of any information required.

5.3 IDENTIFICATION OF THE SOURCES OF RISKS SUBJECT TO MANAGEMENT AND CONTROL

In view of the nature of the Company's risk and its risk appetite, the Counterparties that, due to their business, pre-contractual, contractual or legal relationship with the Company, are involved in the development of its main and related corporate purpose, will be considered as risk factors, namely:

- Suppliers or Providers.
- Candidates and collaborators of Construcciones El Condor.
- Customers.
- Buying Customers.
- Shareholders.
- Partners or allies in projects and/ or concessions.
- Managers.

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5.4 KNOWLEDGE AND ENGAGEMENT OF SUPPLIERS OR CONTRACTORS

5.4.1 Criteria for knowing and engaging suppliers or contractors

The Company will apply the following criteria and control measures to all suppliers.

- No contractual and/ or commercial relationships may be commenced with suppliers or contractors that have not fully complied with the requirements of the Company, both in the **C-P Logistics** procedure and in the **Recruitment** procedure.
- It will not be possible to establish commercial relations with suppliers or contractors, whether they are individuals or legal entities, in the following cases:
 - When they are in the Restrictive Lists or Binding Lists databases.
 - When an Alert Signal is identified in respect of the supplier or contractor that, once analyzed and according to the risk tolerance criteria approved by the Board of Directors, exposes the Company to a non-tolerable risk.
 - When one of the Shareholders or Managers of the supplier or contractor is reported in national or international Binding Lists.
 - When it has been shown that the information provided by the supplier or contractor is non-existent or false.
 - When the Compliance Officer has made a Suspicious Operation report in connection therewith.
 - When the supplier or contractor is reluctant to supply information or to submit the documentation required in accordance with the **C-P Logistics** and **Recruitment** procedures.


Paragraph 1. PEPs. In the case of (PEPs), the Executive or Corporate President shall indicate whether the Company should continue with the business relationship.

Paragraph 2. ML/TF Verification. All suppliers or contractors will be verified against the lists prior to their engagement, i.e. the respective inquiry will be made at the time of requesting quotations so that the respective supplier or contractor is released or rejected when making the purchase decision.

All suppliers or contractors included in Restrictive and/ or Binding Lists will be reported to the UIAF.

Paragraph 3. Comprehensive Verifications. Comprehensive Verification activities will be carried out in the case of an Unusual Operation or when a Warning Signal is identified.

Paragraph 4. Supports. Operations shall be supported by commercial or service contracts, purchase orders, invoices or quotations, which shall be physically preserved together with the

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documents required for the creation and verification of the supplier or contractor, for a minimum period of five (5) years through the Document Management process.

5.4.2 Persons responsible for knowing and engaging suppliers of goods and inputs


The Logistics Director and/ or the Procurement Coordinator for Machinery and/ or the Account Manager and/ or Purchasing Analysts and/ or Administrative Work Coordinator are responsible for:

- Conducting knowledge visits to suppliers when deemed necessary by the Company.
- Ensuring that the information provided by suppliers complies with the requirements for information and engagement purposes.
- Requesting the Compliance Officer to carry out the ML/TF Verification of the suppliers in Restrictive Lists in advance and as a requirement for their engagement.
- Reporting to the Compliance Officer any Warning Signals or Unusual Operations detected, based on **Annex 2 - ML/TF Warning Signals**, upon their engagement or at any time through the Ethics Line or the channels established in the **Case and Investigation Management** procedure.
- Ordering the blocking or inactivation of suppliers when deemed necessary by the Company.
- Implementing, managing and complying with the controls included in this procedure and in **Annex 1 - ML/TF Risk Matrix** for the risk management of Suppliers.

5.4.3 Persons responsible for knowing and engaging contractors

The Project Director, the Administrative Work Coordinator, the Account Manager and/ or the Technical Work and Corporate Office Engineer are responsible for:

- Verifying that contractors provide the information required by the insurer for their acceptance into the Large Beneficiaries program.
- Ensuring that contractors meet the requirements for information and engagement purposes.
- Making a knowledge visit to contractors when the Company deems it necessary.
- Updating the contractor engagement form and the information required by the insurer on an annual basis.
- Requesting the Compliance Officer to carry out the ML/TF Verification of contractors in Restrictive Lists in advance and as a requirement for their engagement and contracting.

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- Reporting to the Compliance Officer any Warning Signals or Unusual Operations detected upon their engagement or at any time through the Ethics Line.
- Implementing, managing and complying with the controls included in this procedure and in **Annex 1 - ML/TF Risk Matrix** for the risk management of contractors.

The Legal Director is responsible for:

- Reporting to the Compliance Officer any Warning Signals or Unusual Operations detected in the hiring process through the Ethics Line or the channels provided in the **Case and Investigation Management** procedure, or that has been reported by any of the collaborators of Construcciones El Condor under his/ her responsibility.

The Legal Coordinator is responsible for:

- Reviewing and verifying, from a legal point of view, the information provided by contractors that is necessary for the proper execution of the agreement.

The Construction Director, Technical Coordinator, Project Director and/ or Civil Resident Engineer are responsible for:

- Reporting to the Compliance Officer any Warning Signals or Unusual Operations detected at any time through the Ethics Line or the channels provided in the **Case and Investigation Management** procedure, or that has been reported by any of the collaborators of Construcciones El Condor under their responsibility.

5.4.4 Criteria for the knowledge of Providers of Properties and Real Estate


- For the purchase of land and properties, full knowledge of the ownership of the property being purchased will be ensured; negotiations will be carried out only with the owner registered in the certificate of conveyance and clearance, unless a duly empowered attorney-in-fact had been designated.
- The **Property Management** procedure established by the Company for the acquisition of properties will be applied.

5.5 KNOWLEDGE OF THE COLLABORATORS OF CONSTRUCCIONES EL CONDOR AND CANDIDATES IN THE SELECTION PROCESS

5.5.1 Criteria for the knowledge of Collaborators of Construcciones El Condor and Candidates in the selection process

The Company will apply the following control measures to all Collaborators of Construcciones El Condor and Candidates:

- The ML/TF Verification will be carried out in respect of all the Collaborators of Construcciones El Condor and the Candidates. All Collaborators of Construcciones El

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Condor that are in Restrictive Lists will be reported to the UIAF.

- The selection of the Collaborators of Construcciones El Condor will conform to the **Human Talent C-P-T** procedure established by the Company for their positions.
- No Candidates may be engaged and no working relationships will be maintained with the Collaborators of Construcciones El Condor that are included in Restrictive Lists.
- The hiring of an Employee (PEPs) will require the authorization of the person or position defined by the Company.
- Printed evidence of the inquiry in Restrictive and Binding Lists will be included in the resume of the applicant.
- The inquiry of the Collaborators of Construcciones El Condor in Restrictive and Binding Lists will be carried out permanently.
- PEPs. In the case of PEPs, the Executive or Corporate President must indicate if the Company should continue with the employment relationship.

5.5.2 Persons responsible for knowing and engaging of Collaborators of Construcciones El Condor

The Human Talent and Worker Wellness Coordinator is responsible for:

- Ensuring that the Collaborators of Construcciones El Condor and the Candidates meet the requirements of the **Human Talent C-P-T** procedure for knowledge and engagement purposes.
- Scheduling the discretionary home visits that may be required and those that due to the criticality of the position are necessary.
- Requesting the Compliance Officer to carry out the ML/TF Verification of Candidates in Restrictive Lists in advance and as a requirement for their engagement.
- Ensuring the inquiry of the Collaborators of Construcciones El Condor in Restrictive and Binding Lists on a permanent basis.
- Reporting to the Compliance Officer any Warning Signals of the Collaborators of Construcciones El Condor and the Candidates that are detected upon their engagement or at any time through the Ethics Line or the channels established in the **Case and Investigation Management** procedure or that may be reported by any of the Collaborators of Construcciones El Condor under his/ her responsibility.
- Implementing, managing and complying with the controls included in this procedure and in **Annex 1 - ML/TF Risk Matrix** for the risk management of the Collaborators of Construcciones El Condor and the Candidates.

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The Human Management Analyst, Human Talent Analyst and Human Talent Assistant are responsible for:

- Reporting to the Human Talent and Worker Wellness Coordinator any Warning Signals of Collaborators of Construcciones El Condor and the Candidates that are detected upon their engagement or at any time thereafter.

5.6 KNOWLEDGE OF CUSTOMERS

5.6.1 Criteria for the knowledge of customers


- No customers may be engaged and no contractual relationships may be maintained with customers, whether in the case of individuals or legal entities, which are included in Restrictive Lists such as OFAC, UN and other risk lists in relation to the ML/TF risk.
- The ML/TF Verification will be carried out with respect to all potential customers prior to their engagement as part of the risk analysis.
- The Comprehensive Risk Verification will be carried out to all potential customers in the case of any Warning Signals or when the Company deems it necessary.
- All customers reported in Restrictive Lists and other material ML/TF risk lists will be reported to the UIAF.
- PEPs. In the case of PEPs, the Executive or Corporate President shall indicate whether the Company should continue with the business relationship.

5.6.2 Responsibilities

The Commercial Director is responsible for:

- Requesting the Compliance Officer to carry out the ML/TF Verification of potential Customers in advance and as a requirement for their engagement.
- Supplementing the risk identification analysis of potential Customers with the results of the ML/TF Verification.
- Supplementing the risk identification analysis of potential Customers with the results of the Comprehensive Risk Verification in the case of any Warning Signals or when deemed necessary.
- Reporting to the Compliance Officer any Warning Signals that are detected in the engagement process through the Ethics Line.

The Legal Director is responsible for:

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- Reporting to the Compliance Officer any Warning Signs that are detected in the engagement process through the Ethics Line.

The Construction Director, the Technical Coordinator, the Project Director and/ or the Civil Engineer are responsible for:

- Reporting to the Compliance Officer any Warning Signals or Unusual Operations that are detected at any time through the Ethics Line.

5.7 KNOWLEDGE OF BUYING CUSTOMERS


5.7.1 Criteria for the knowledge of Buying Customers

- No contractual and/ or commercial relations may be commenced or maintained with Buying Customers that have not fully complied with the requirements demanded by the Company for their engagement, except for registered trading establishments.
- No customers may be engaged and no contractual relationships may be maintained with customers, whether in the case of individuals or legal entities, which are included in Restrictive Lists.
- The ML/TF Verification will be carried out with respect to all customers prior to their engagement as part of the risk analysis.
- The Comprehensive Risk Verification will be carried out to all customers in the case of any Warning Signals or when the Company deems it necessary.
- All customers reported in Restrictive Lists and other material ML/TF risk lists will be reported to the UIAF.
- PEPs. In the case of PEPs, the Executive or Corporate President shall indicate whether the Company should continue with the business relationship.

5.7.2 Responsibilities

The Project Director and/ or Account Manager are responsible for:

- Ensuring that Buying Customers meet the requirements for knowledge and engagement purposes.
- Scheduling and/ or carrying out the knowledge visits that are deemed necessary.
- Requesting to the Compliance Officer to carry out the ML/TF Verification of (Buying) Customers in Restrictive Lists in advance and as a requirement for their engagement.
- Reporting to the Compliance Officer any Warning Signals and/ or Unusual Operations of Buying Customers that are detected upon their engagement or at any time through the Ethics Line or the channels established in the **Case and Investigation Management**

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procedure or that may be reported by any of the Collaborators of Construcciones El Condor under their responsibility.

- Implementing, managing and complying with the controls included in this procedure and in **Annex 1 - ML/TF Risk Matrix** for the risk management of Buying Customers.

5.8 KNOWLEDGE OF SHAREHOLDERS

5.8.1 Criteria for the knowledge of Shareholders

The Company is a public limited company registered in the Colombia Stock Exchange (CSE), whose shares are managed by Deceval. In compliance with the **ML/TF Risk Management** procedure, the Company will ensure that effective risk management policies are complied with and that its processes guarantee, in the case of Shareholders, the non-occurrence of risks associated with money laundering and terrorist financing.

5.9 KNOWLEDGE OF PARTNERS OR ALLIES IN PROJECTS AND/ OR CONCESSIONS


5.9.1 Criteria for the knowledge of partners or allies in projects and/ or concessions

- No contractual and/ or commercial relationships may be commenced with partners or allies in projects and/ or concessions that have not fully complied with the requirements demanded by the Company for purposes of knowledge, due diligence and engagement.
- No contractual relationships may be maintained with partners or allies in projects and/ or concessions included in Restrictive Lists.
- For relationships with partners or allies in projects and/ or concessions that are legal entities, the specifications of the legal representatives, main shareholders/ partners and the Statutory Auditor will be required, in order to be verified against the Restrictive Lists.
- The ML/TF Verification of legal entities or individuals will be carried to all existing and new Shareholders or Allies.
- The Comprehensive Risk Verification will be carried out to all partners or allies in projects and/ or concessions prior to their engagement as part of the risk analysis.
- All individuals or legal entities included in Restrictive Lists will be reported to the UIAF.
- PEPs. In the case of PEPs, the Executive or Corporate President shall indicate whether the Company should continue with the business relationship.

5.9.2 Responsibilities

The General and Legal Secretary is responsible for:

- Verifying the information provided and filled out by partners and allies.

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- Requesting the Compliance Officer to carry out the Comprehensive Risk Verification of partners or allies as part of the **Due Diligence** procedure.
- Reporting to the Compliance Officer any Warning Signals that are detected in the **Due Diligence** procedure and at any later time through the Ethics Line or the channels established in the **Case and Investigation Management** procedure.

5.9.3 Criteria for the management of cash transactions and operations

All transactions will be carried out through the means authorized by financial institutions.

The Accounting Analyst of the Central Office is responsible for:

- Reporting to the Compliance Officer on a weekly basis all cash transactions through the **Cash Operations Report**.

The Compliance Officer is responsible for:

- If the cash operation is considered suspicious, reporting this fact to the UIAF within the first 10 calendar days of the month following the cutoff date.

5.10 TRAINING

Training will be carried out at least once (1) a year in person or virtually, will be mandatory, and will address at least the following aspects: current regulatory framework, **ML/TF Risk Management** procedure, roles and responsibilities of all Collaborators of Construcciones El Condor regarding ML/TF risk management, reporting mechanisms and sanctions regime.


The Compliance Officer is responsible for:

- Designing the training strategy of the Collaborators of Construcciones El Condor of the Company on issues related to the management of ML/TF risks.
- Sending a communication through corporate email to those responsible for the processes when the **ML/TF Risk Management** procedure is updated and/ or an amendment is made to the applicable regulations.

The Knowledge and Innovation Management Coordinator and/ or Human Talent and Worker Wellness Coordinator is responsible for:

- Coordinating the performance of on-site and/ or virtual training to all Collaborators of Construcciones El Condor at least once a year.
- Including a module related to ML/TF risk management within the Company in the training plan for the new Collaborators of Construcciones El Condor.

5.11 REPORT OF UNUSUAL AND/ OR SUSPICIOUS OPERATIONS

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Process Leaders are responsible for:

- Reporting and denouncing all Warning Signals and Unusual Operations that may be generated or detected in their process to the Compliance Officer.

All the Collaborators of Construcciones El Condor are responsible for:

- Be vigilant to detect and report to their process leader all Warning Signals and Unusual Operations that may be generated or detected in their process and that they consider may involve the existence of ML/TF risks.

Reports must be submitted through the Ethics Line or the channels established in the **Case and Investigation Management** procedure and must contain at least the following:

- Full identification of the Counterparty, detailed description of the event, material supporting the report and supplementary information for analysis (if applicable).


The Compliance Officer is responsible for:

- Receiving and processing the report through the Ethics Line or the channels established in the **Case and Investigation Management** procedure.
- Analyzing the report, defining whether the operation can be classified as a Suspicious Operation and determining the appropriateness of the report.
- Submitting the **Suspicious Operations Report** to the UIAF and/ or other competent authorities, if applicable.
- Responding to the complainant officer regarding the determination to be followed, either to:
 - Monitor the source of risk on a permanent basis.
 - Reject the engagement, operation, transaction, negotiation or hiring with the source of risk.
 - Terminate the transaction, negotiation or engagement with the source of risk.

It is not necessary for the Compliance Officer to be certain that it is a criminal activity, identify the criminal type or to investigate the Suspicious Operations, it will suffice to report them to the competent entity.

5.12 SUPPLY OF INFORMATION TO COMPETENT AUTHORITIES

The Compliance Officer is responsible for:

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- Carrying out, when defined, the **Report to the Competent Authority** (UIAF) in case of a Suspicious Operation, according to the Warning Signals established and the analysis conducted.

The Legal Director is responsible for:

- Delivering the information required by the requesting entities, following the fulfillment of all legal requirements.

5.13 UPDATE OF THE PROCEDURE

This procedure will be updated when the Company's needs or regulatory changes so require it.

In case of entering into a new market, a ML/TF risk identification must be carried out in order to implement any additional controls that may be necessary.

5.14 SANCTIONS

The Collaborators of Construcciones el Condor are required to comply with the Risk Management Policy, the Code of Business Ethics, this procedure and the applicable regulations for the prevention and control of ML/TF risks. Failure to comply with the above may entail the imposition of disciplinary sanctions up to the termination of the employment contract or contractual relationship.

The imposition of sanctions must respect the provisions of the Internal Labor Regulations and guarantee the right of defense of the Collaborators of Construcciones El Condor.


5.15 DUTY OF CONFIDENTIALITY

The information obtained in the development of the **ML/TF Risk Management** procedure is subject to confidentiality, which means that it can only be known by the Financial Information and Analysis Unit (UIAF) of the Ministry of Finance and Public Credit and by the Attorney General's Office of the Nation upon request.

Therefore, all Collaborators of Construcciones El Condor who have responsibilities assigned in the present procedure, are under the obligation to guard and limit the use thereof for the purposes strictly established.

All Collaborators of Construcciones El Condor are prohibited from disclosing to the Counterparties or to any third parties the causes that gave rise to the control implemented, except to the competent authorities that may have made requirements in accordance with the legal provisions. Any request in this regard must be informed to the Legal Director, who must define the reply to be given.

6. RECORDS

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NAME OF RECORD	STORAGE	RETENTION PERIOD
Comprehensive Risk Validation Report	Archives of the Risk Management Director	5 years
ML/TF Risk Verification Reports	Archives of the Risk Management Director	5 years
Comprehensive Risk Verification Reports	Archives of the Risk Management Director	5 years
Report of Unusual Operations and Warning Signals through the Ethics or other channels	Custody System - Ethics Line - Archives of the Risk Management Director	5 years
Suspicious Operations Report to the UIAF	Archives of the Risk Management Director	5 years
Cash Operations Report	Archives of the Risk Management Director	5 years

7. REVIEW AND APPROVAL

Prepared by:		Reviewed by:		Approved by:	
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