

POLICY ON MANAGEMENT FOR THE PREVENTION AND CONTROL OF THE RISK OF MONEY LAUNDERING, TERRORISM FINANCING, MASS DESTRUCTION WEAPONS, AND/OR TRANSNATIONAL CORRUPTION OR BRIBERY

BYCSA S.A. is subject to the supervision of Colombia's Superintendence of Companies. In compliance with current regulations, the company has designed a risk management system, implemented policies, and established controls to prevent money laundering, terrorism financing, the proliferation of mass destruction weapons, and transnational corruption or bribery crimes. This initiative is undertaken to achieve strategic objectives and provide management with reasonable assurance regarding their accomplishment.

I. OBJECTIVE

The objective is to establish guidelines for management in the prevention and control of transnational corruption risks, money laundering, terrorism financing, and the proliferation of mass destruction weapons. This is aimed at minimizing the possibility of the company being involved in these crimes through various activities in the development of its operations or business.

II. GENERAL CONDITIONS

BYCSA S.A. is committed to combating illicit activities and will comply with applicable regulations. BYCSA S.A. will internally promote a clear rejection of any criminal activity or behavior involving Money Laundering, Terrorism Financing, Weapons of Mass Destruction, Bribery, and/or Corruption. The achievement of BYCSA's commercial goals is contingent upon compliance with transparency and business ethics standards.

All operations, business, and contracts conducted by BYCSA S.A. will adhere to policies and procedures outlined in its manuals and other internal regulations, governing transparency, and business ethics risk sources; otherwise, the operation, business, or contract will not be processed.

This policy is mandatory, as are all related procedures, and applies to all personnel, shareholders, clients, suppliers, and other parties associated with BYCSA S.A.

III. ANTI-MONEY LAUNDERING, COUNTER-TERRORISM, COUNTER MASSIVE DESTRUCTION WEAPON PROGRAM, AND TRANSPARENCY AND BUSINESS ETHICS PROGRAM

Due diligence for knowledge of clients and suppliers: Individuals or legal entities seeking inclusion in the registry of BYCSA S.A. will undergo an identification process and compliance check through the completion of a form and/or the submission of supporting documentation, subject to verification and confirmation. Corresponding analyses will be conducted during their affiliation to ensure coherence with their economic activity and other provided information.

Enhanced due diligence for clients and suppliers posing a higher risk of Transnational Bribery and/or Corruption: Depending on the product marketing method, BYCSA S.A. will develop special affiliation and monitoring processes for third parties whose activities may expose them to a higher risk of ML/TF/CFT, corruption, and/or transnational bribery. BYCSA S.A. will strive to determine the ultimate beneficiary of goods and services traded in these cases.

BYCSA S.A. will not initiate contractual relationships with clients, employees, suppliers, or third parties registered with publicly available negative information. This policy will be considered an important criterion for denying or terminating a contractual relationship.



Verification of Binding and Restrictive Lists: BYCSA S.A.X will not establish any relationships with clients, employees, suppliers, or third parties that may be listed in binding lists for Colombia. Additionally, the alignment with other lists or negative public information related to ML/FT/FPADM, corruption, and/or bribery will be considered a significant criterion for denying or terminating a contractual or business relationship.

IV. DUTY OF CONFIDENTIALITY

Confidentiality Information about our customers' and suppliers' information: BYCSA S.A., will only lift confidentiality on information collected from counterparts because of written requests made specifically by competent authorities, meeting legal requirements and forms, and in cases defined by current regulations.

V. ETHICS AND TRANSPARENCY PROGRAM REPORTING CHANNEL

What to do when you find a situation of corruption or transnational bribery risk involving BYCSA S.A., its employees, clients, suppliers, or shareholders?

BYCSA S.A. has improved, through a consulting firm, a confidential internal reporting channel to manage reports submitted by anyone via email to transparenciaysagrilaft@bycsa.co, BYCSA S.A. has also informed its employees about this channel, as well as the official channels appointed by the Superintendence of Companies and the Secretary of Transparency of the Presidency of the Republic of Colombia.

What to do when find a situation of corruption or transnational bribery risk in general?

Transnational Bribery Reporting Channel:

<https://www.supersociedades.gov.co/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional>

Corruption Acts Reporting Channel:

<https://portal.paco.gov.co/index.php?pagina=denuncie>