

<DOCUMENT NAME>		
<b>MANAGEMENT PROGRAM FOR PREVENTION OF THE /FT</b>		
<CODIMENT OF THE DOCUMENT> <b>IN-AZP02</b>	<DATE LAST REVIEW> <b>03/03/2021</b>	<REVIEW STATUS> <b>01</b>

## 1. OBJECTIVE

Establish controls against the identified risks of money laundering and terrorist financing as well as the protocol of action against Reporting Unusual Operations, Report Of Suspicious Operations, Report Of Absence Of Suspicious Operations

## 2. SCOPE

Applies to all internal processes of INSURCOL LTDA.

## 3. REQUIRED DOCUMENTS

- **NTC ISO 9001;2015** Quality Management System
- **NTC ISO 14001;2015** Environmental Management System
- **NTC ISO 45001;2018** Occupational Health and Safety Management System
- **NTC ISO 27001;2013** Information Security Management System
- **SGE21** Corporate Social Responsibility Management System
- **RUC:** Occupational Health and Environmental Health System Guide for Contractors
- **GUIDE TO THE FUNDAMENTALS FOR PROJECT MANAGEMENT.** Sixth edition. PMBOK (Project Management Body of Knowledge) of the PMI
- **IN-AZD64-F02** Risk and Opportunity Identification Matrix
- **IN-AZM32-F01** Manual of Charges Bucaramanga Office
- **IN-AZM32-F02** Manual of Charges Office Bogotá
- **IN-AZM32-F03** Project Positions Manual
- **IN-CAI01-F08** Matrix Legislation Base of the Quality Management System
- **IN-CAD31** Comprehensive Management Policy
- **IN-AZD59** Quality Management System
- **IN-AZM33** LA-FT Self-Control and Management System Manual
- **Vienna Convention of 1988:** United Nations Convention against Traffic in Narcotic Drugs and Psychotropic Substances (Approved in Colombia by Law 67 of 1993, Judgment C-176 of 1994).
- **United Nations Convention for the Suppression of the Financing of Terrorism of 1999** (Approved by Law 808 of 2003, Judgment C-037 of 2004).
- **Palermo Convention of 2000:** United Nations Convention Against Organized Crime (Approved by Law 800 of 2003, Judgment C-962 of 2003)
- **Merida Convention of 2003:** United Nations Convention Against Corruption (Approved by Law 970 of 2005, Sentence C-172 of 2006).
- **Law 599 of 2000** by which the Colombian Criminal Code is issued, articles 323 and 345 define the crimes of Money Laundering and Financing of Terrorism.
- **Circular 100-00005 OF 2014** by means of which the Superintendency of Companies determines that a person responsible for the execution and monitoring of the LA/FT risk self-control and management system must be appointed, who will report as often as established.
- **Basic Circular No. 100-000003 of July 22, 2015,** Chapter X – Self-control and Risk Management LA/FT and report of suspicious operations to the UIAF.

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- Basic Circular of the Superintendency of Companies No. 100-000005 of September 4, 2015.
- Basic Circular of the Superintendency of Companies No. 100-000006 of October 25, 2016.
- Basic Circular of the Superintendency of Companies No. 100-000001 of March 21, 2017.
- Basic Circular of the Superintendency of Companies No. 100-000005 of November 22, 2017.

#### 4. DEFINITIONS

- **COUNTERPARTIES:** Refers to any natural or legal person with whom the company has commercial, business, contractual or legal ties of any order. Among others, shareholders, partners, employees of the company, customers and suppliers of goods or services are counterparties.
- **RISK FACTORS:** The Superintendence of Companies explicitly indicates that they are the Counterparties. For the purposes of the SAGRLAFT of INSURCOL LTDA., the following must be taken into account:
  - ✓ **Client:** It is any natural or legal person with whom INSURCOL LTDA., establishes and maintains a contractual or legal relationship for the supply of any product of its activity.
  - ✓ **Product:** These are the legally authorized operations that INSURCOL LTDA. can carry out, through the conclusion of a contract.
  - ✓ **Distribution Channels:** The Distribution channels are through which INSURCOL LTDA., can carry out the commercialization of its products.
  - ✓ **Jurisdictions:** Jurisdictions are the geographical places where INSURCOL LTDA., carries out its commercial activity.
- **FINANCING OF TERRORISM:** An offence regulated in article 345 of the Criminal Code.
- **FATF:** Refers to the Financial Action Task Force. It is an intergovernmental body whose purpose is to develop and promote policies and measures to combat money laundering and the financing of terrorism. It currently has 40 recommendations that constitute the international standard for combating the aforementioned crimes and the proliferation of weapons of mass destruction.
- **LA/FT RISK MANAGEMENT:** Adoption of policies to prevent and control the risk of Money Laundering and Terrorist Financing.
- **TOOLS:** These are the means used by a company to prevent the LA/FT Risk from occurring and to detect attempted, unusual or suspicious operations.
- **MONEY LAUNDERING:** Crime regulated in article 323 of the Criminal Code.
- **LA/FT:** Refers to Money Laundering and Terrorist Financing.
- **OFAC:** Office of Financial Assets Control, belongs to the U.S. Department of the Treasury that identifies U.S. countries, terrorists and drug traffickers punishable by the U.S. standard. This Office issues the OFAC list also known as the Clinton list.
- **COMPLIANCE OFFICER:** Employee of the Obligated company who is responsible for promoting and developing the specific procedures for the prevention, updating and mitigation of LA/FT Risk and whose profile is described in Basic Circular 100-000006 of 2016 of the Superintendency of Companies in subliteral b) of paragraph B of number 4 of Chapter X.
- **FAILURE TO REPORT:** It consists of having knowledge of the commission of the crimes indicated in the Criminal Code and not reporting them.
- **OPERATION ATTEMPTED:** Refers to that operation in which a natural or legal person intends to carry out a Suspicious Operation, but this is not perfected because the person who intends to carry it out desists or, because the established controls have not allowed him to carry it out.
- **UNUSUAL OPERATION:** That operation whose amount or characteristics are not related to the ordinary or normal economic activity of the Company or, due to its number, quantity or characteristics, are not framed within the guidelines of normality or ordinary business practices in a sector, in an industry or with a class of Counterparty.

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- **SUSPICIOUS OPERATION:** Refers to that Unusual Operation that, in addition, in accordance with the uses and customs of the activity in question, could not be reasonably justified.
- **POLITICALLY EXPOSED PERSONS (PEP'S):** Individuals who perform outstanding public functions or who, by their position, manage or administer public resources. This definition also includes individuals who have performed prominent public functions or who, by virtue of their position, have managed or administered public resources. However, PYP status will only be retained for a period of 2 years after the date on which the respective individual has ceased to perform the outstanding public functions or has ceased to administer or manage public resources. By way of example, PEPs are politicians, government officials, judicial and military officials, in those cases in which the aforementioned persons occupy or have held positions of high hierarchy. PePs are also considered senior executives of state-owned enterprises, high-ranking officials in political parties and heads of state.
- **UNUSUAL OPERATIONS REPORT -ROI-:** Report made by any official of INSURCOL LTDA and report to the Quality Coordinator.
- **SUSPICIOUS TRANSACTIONS REPORT -ROS-:** Report made by the Compliance Officer to the UIAF.
- **RISKS OF THE /FT:** Possibility of loss or damage that a Company may suffer due to money laundering and / or channeling of resources towards the realization of terrorist activities, or when the concealment of assets from such activities is intended. The contingencies inherent in the LA/FT are materialized through risks such as legal, reputational, operational or contagion, to which the Company is exposed, with the consequent negative economic effect that this may represent for its financial stability, when used for such activities.
- **CONTAGION RISK:** It is the possibility of loss directly or indirectly, by an action or experience of a relative. The related or associated includes natural or legal persons who have the possibility of exerting influence over the entity.
- **LEGAL RISK:** It is the possibility of loss on occasion to be sanctioned or obliged to compensate damages as a result of non-compliance with rules or regulations and contractual obligations. Legal Risk also arises as a result of failures in contracts and transactions, derived from ill-intentioned action, negligence or involuntary acts that affect the formalization or execution of contracts or transactions.
- **OPERATIONAL RISK:** Possibility of incurring losses due to deficiencies, failures or inadequacies, in human resources, processes, technology, infrastructure or the occurrence of external events. This definition includes the legal and reputational risk associated with such factors.
- **REPUTATIONAL RISK:** It is the possibility of loss due to discredit, bad image, negative publicity, true or not, regarding the institution and its business practices that cause loss of customers, decrease in income or judicial processes.
- **RESIDUAL RISK:** It is the resulting level of risk after applying the controls.
- **UIAF:** The Financial Information and Analysis Unit - UIAF is a Special Administrative Unit attached to the Ministry of Finance and Public Credit that aims to prevent and detect possible Money Laundering and Financing operations in different sectors of the economy. The UIAF was created by Law 526 of August 1999, has legal personality, administrative autonomy, independent assets and special regimes in the field of personnel administration, nomenclature, classification, salaries and benefits, and is of a technical nature.

## 5. EQUIPMENT

- Not applicable.

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## 6. WORK INSTRUCTIONS

### 6.1 UNUSUAL OPERATIONS REPORT

PHVA	WHAT	WHO	WHEN	HOW
<b>PLAN</b>	1. The control mechanisms before the identified risks of the /ft.	Board of directors, management, sub-management, HSE & CSR coordination and compliance officer.	Annually / When required	Performing a review of the risk and opportunity identification matrix IN-AZD64-F02, as well as the analysis of external and internal issues related to the LA-FT self-control system.
<b>DO</b>	1. Manage LA/FT controls with clients	Commercial Engineers, Coordination of Accompaniment of pre-sales, sales and after-sales, Subordination of Accompaniment of pre-sales, sales and after-sales	Whenever the entry of a new client is required	<p>Once the need to create a new client is identified, it is necessary to develop the following actions:</p> <p>Request together with the RUT and the banking certification the format of Authorization of processing of customer data IN-AZD56-F05, which specifies the authorization of consultation in the Databases and checklists of LA / FT, and certification of origin of funds.</p> <p>The request and file of the format Authorization of processing of customer data IN-AZD56-F05, is specified in the established procedure IN-AZD56 Personal Data Protection Program</p>

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PHVA	WHAT	WHO	WHEN	HOW
DO	2. Manage LA/FT controls for suppliers	Who involves the supplier, Area Coordinators, Area Sub-Coordinators, Responsible for making purchases	Each time you require a vendor to enter the organization's database	<p>Once the person responsible for the purchase requires to enter a new supplier, he must request within the required records the authorization of data processing supplier IN-AZD56-F06, where the authorization of consultation in Databases and checklists of LA / FT is specified.</p> <p>The request and file of the format Authorization of data processing of provider IN-AZD56-F06, is specified in the established procedure IN-AZD56 Personal Data Protection Program.</p>
DO	3. Manage LA/FT controls for suppliers	Evaluation Committee	In the re-evaluation of suppliers	<p>Verify at the time of reevaluation of suppliers the obligation to consult in the checklists of LA / FT, either by NIT, or citizenship card or name of legal representative, this consultation will be a requirement for the signatures and endorsement of supplier reevaluated in format RE-EVALUATION OF SUPPLIER of code IN-AZD09-F13.</p>
DO	4. Manage LA/FT controls with workers	HR Coordinator / HR Sub-Coordinator	Each entry during the worker selection process	<p>During the process of entry of a worker, the person in charge must make the queries in the checklists and Databases of LA / FT, by identity document (citizenship card) if there is any type of report leaving consigned in the format of Authorization for applicant to work IN-AZD65-F02.</p> <p><b>Note 1:</b> The methodology described for the consultation of the restrictive lists is found in the document IN-AZP02 MANAGEMENT PROGRAM FOR PREVENTION OF THE-FT and IN-ADD01 Selection and Hiring of Personnel.</p> <p><b>Note 2:</b> The methodology described for the handling of the format IN-AZD65-F02 Authorization for aspiring to work, Is described in the procedure IN-AZD65 Personal Data Protection Program.</p>
DO	5. Manage LA/FT training and training with workers	Quality coordination	According to the annual training plan IN-CAP07-F03, each year.	<p>Monitoring and control in the execution of training activities and awareness in relation to the prevention of LA / FT. For each person in charge on the dates and times established for all the staff of the organization.</p>

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PHVA	WHAT	WHO	WHEN	HOW
DO	6. Conduct training and training on LA/FT to workers	HSE & CSR Coordination / Compliance Officer / Lawyer	According to annual training plan	Carry out the scheduled trainings on the Risk Management System of Money Laundering and Financing of Terrorism to all workers as scheduled in the annual training plan IN-CAP07-F03, of each year
DO	7. Record the verifications carried out.	Compliance Officer HSE & CSR Coordination	Each time you sign a customer, supplier and/or worker verification	Leaving Recorded in the consolidated verification query of Databases and Lists LA/FT IN-AZP02-F01, the verification queries made by each person in charge and the compliance verification carried out in the formats IN-AZD56-F02 Authorization for aspiring to work, IN-AZD56-F05 Authorization of processing of customer data, IN-AZD56-F06 Authorization of data processing supplier, and IN-CAD09-F13 Re-evaluation of Suppliers
VERIFY	1. Verify compliance with the LA/FT prevention program	Customer	Whenever required	Requesting registrations and authorizations for entry into their databases.
		Compliance Office	Quarterly / Semiannually	By presenting management reports to the quality area, performing the calculation of the assigned indicators according to the Document of Indicators of the Quality Management System.
		Internal Auditor	According to Internal Audit Program	Developing internal audits to the requirements established in this procedure
VERIFY	2. Check on the lists of restrictive LA/FT reports of existing customers	Compliance Officer / Quality Area	Annually	Consulting in the restrictive lists of LA/FT by nit or cedula of the legal representative of the client, according to instructions described in the IN-AZM33 MANUAL OF THE SYSTEM OF SELF-CONTROL AND RISK MANAGEMENT OF THE / FT, in case it appears the respective reporting process will be carried out. The result of the verifications to the clients will remain in the CONSOLIDATED IN-AZP02-F01 OF CONSULTATION OF VERIFICATION OF DATABASES AND LISTS LA/FT
VERIFY	3. Verify in the lists of restrictive LA/FT reports of the workers linked to a period of more than one year.	Compliance Officer / Quality Area	Annually	Consulting the restrictive lists of LA/FT with worker's ID, according to the instructions described in the IN-AZM33 MANUAL OF THE SELF-CONTROL AND RISK MANAGEMENT SYSTEM OF LA-FT, in case it appears, the respective reporting process will be carried out. And the indications of internal work regulations will be applied. The result of the verifications to the workers will remain in the IN-AZP02-F01 CONSOLIDATED CONSULTATION OF VERIFICATION OF DATABASES AND LISTS LA/FT
	4. Participate in Internal and External Audits of the Integral	Compliance Officer / HSE & CSR Coordination	According to the audit schedule	Attending the audit and maximum collaboration with the requirements of the audit team

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PHVA	WHAT	WHO	WHEN	HOW
	Management System			
<b>ACT</b>	1. Act in front of Unusual Operations Report.	Compliance Officer	When the need warrants it	They will have to be sent to the UIAF or to the competent authorities by the means and in the relevant and established times.
	2. Report of Suspicious And Non-Suspicious Transactions.	Compliance Officer.	When the need warrants it.	The report of suspicious transactions must be issued to the Online Reporting System in the shortest possible time and from the moment the entity makes the decision to catalog it as such.
		Compliance Officer.	When the need warrants it.	In case that when making the query it is not suspicious, it is left consulted in the consolidated format of verification query of Databases and Lists LA/FT IN-AZP02-F01
		General Management, Attorney General, Coordinator	When Performing Internal and External Audits, Reviews by Management and / or presenting opportunities for improvement.	Participate in non-conformities action plans, corrective and preventive actions and opportunities for improvement.

## 6.6 CONSULTATION LINKS

For verification queries in LA/FT lists you must enter the following Links

1. <https://www.un.org/securitycouncil/es/content/un-sc-consolidated-list>
2. <https://sanctionssearch.ofac.treas.gov/>
3. <https://www.interpol.int/es/Como-trabajamos/Notificaciones/Ver-las-notificaciones-rojas>
4. <https://apps.procuraduria.gov.co/webcert/Certificado.aspx?t=dAylAkFT/gSkkvpDoI89aORiq2C8LI3z9uHANBFaF08/32nPrGQhH4HhIkyJHgMD30HMssetl+/9E7geoLvRxafJkUC15pg/jWnZSZm15ZVipvVlkwZR+ZjqHUuiB4weW8T9vSbEQL83gQVd8Fjpxh+k1KLUIXaPEX8tf3eHevJgIDWDAm6iToJf2cdTL4D&tpo=2>

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5. <https://www.contraloria.gov.co/control-fiscal/responsabilidad-fiscal/certificado-de-antecedentes-fiscales>
6. <https://antecedentes.policia.gov.co:7005/WebJudicial/>
7. <http://www.fatf-gafi.org/countries/#other-monitored-jurisdictions>
8. [https://www.uiaf.gov.co/caracterizacion\\_usuario/perfiles/sirel](https://www.uiaf.gov.co/caracterizacion_usuario/perfiles/sirel)

## 7. CONTROL OF RECORDS.

The formats that are generated from this procedure are identified and controlled, according to the following Log Control table.

IDENTIFICATION			STORAGE				RESPONSIBLE
CODE	REGISTRATION	MAGN/PRINT FILE TYPE	ACTIVE FILE	VALIDITY	DISPOSAL		
					INACTIVE FILE	VALIDITY	
IN-AZP02-F01	Consolidated database and LA/FT list verification query	Magnetic	Defined by the compliance officer	1 year	General Inactive	Limitless	Compliance Officer