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| <DOCUMENT NAME> MANAGEMENT PROGRAM PREVENTION ML /FT | | |
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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.

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.** 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.
- 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.

FILE PATH: E: /Iso9000 / 8. OPERATION / 8.1 OPERATIONAL PLANNING AND CONTROL / IN-AZP02 MANAGEMENT PROGRAM FOR PREVENTION OF THE /FT

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- 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, the following must be taken into account:
 - ✓ **Client:** It is any natural or legal person with whom INSURCOL 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 can carry out, through the conclusion of a contract.
 - ✓ **Distribution Channels:** The Distribution channels are through which INSURCOL can carry out the commercialization of its products.
 - ✓ **Jurisdictions:** Jurisdictions are the geographical places where INSURCOL 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 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.
- **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

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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 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.

6. WORK INSTRUCTIONS

6.1 UNUSUAL OPERATIONS REPORT

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| PHVA | WHAT | WHO | WHEN | HOW |
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| PLAN | 1. The control mechanisms before the identified risks of the /ft. | Board of directors, management, sub-management, HSE & CSR coordination, HSE & CSR Sub-coordination and the compliance officer and compliance officer. | Annually / When required/according to the schedule | 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. |
| DO | 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> |
| DO | 2. Manage LA/FT controls for suppliers | Who involves the supplier, User of 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 | 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. |

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| 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>Note 1: 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>Note 2: 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 / sub-coordination of quality | According to the annual training plan IN-CAPO7-F03, each year. | 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 organization's personnel according to how the annual training plan IN-CAD07-F03 is defined, generated for the current year. |
| DO | 6. Conduct training and training on LA/FT to workers | HSE & CSR Coordination / Compliance Officer / Lawyer | According to annual training plan IN-CAD07-F03 | 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-CAPO7-F03, of each year |
| DO | 7. Record the verifications carried out. | Compliance Officer HSE & CSR Coordination / HSE & CSR Sub-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 which includes the progress and management of the management program for the prevention of ML/FT, this information is taken into account and reflected in the management review report that is carried out quarterly and semi-annually. |

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| | | 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 | Sales/presales/post sales assistant | Annually and/or when it is required | <p>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 process will be carried out. perform the following procedure:</p> <p>The client will be informed in writing that according to the annual validation that Insurcol carries out to all its clients regarding the consultation of the different lists of databases, a finding of judicial history was found, the type of finding must be specified, the file number, Therefore, you should expand information by answering the following questions:</p> <ul style="list-style-type: none"> ➤ Type of demand ➤ Cause of claim ➤ Current status of demand ➤ If the claim has had some type of ruling <p>If there is any other disciplinary or criminal process or of any other nature, it must detail:</p> <ul style="list-style-type: none"> • the facts that gave rise to the investigation, • the type of process, • the entity that advances it • the current state of the same <p>The above information will be passed on to the External Lawyer, in order for him to give us his concept, to be disclosed to Senior Management, or there it will be determined whether or not this lawsuit affects the legal transaction that is going to be held between the parties and establish the action plan to be taken,</p> <p>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</p> <ul style="list-style-type: none"> • Note: In the event that some type of Suspicious Operations (ROS) is observed, the company will be obliged to make the report to the UIAF (INFORMATION AND FINANCIAL ANALYSIS UNIT). |

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| PHVA | WHAT | WHO | WHEN | HOW |
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| VERIFY | 3. Verify in the lists of restrictive LA/FT reports of the workers linked to a period of more than one year. | HR subcoordinator | Annually | <p>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 process will be carried out.</p> <p>The worker will be informed in writing that according to the annual validation that Insurcol carries out to all its workers regarding the consultation of the different lists of databases, a finding of judicial records was found, the type of finding must be specified, the file number, Therefore, you should expand information by answering the following questions:</p> <ul style="list-style-type: none"> ➤ Type of demand ➤ Cause of claim ➤ Current status of demand ➤ If the claim has had some type of ruling <p>If there is any other disciplinary or criminal process or of any other nature, it must detail:</p> <ul style="list-style-type: none"> • the facts that gave rise to the investigation, • the type of process, • the entity that advances it • the current state of the same <p>The above information will be passed to the External Lawyer, in order for him to give us the concept of it, to be disclosed to Senior Management and establish what action plan is going to be taken,</p> <p>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</p> |
| | 4. Participate in Internal and External Audits of the Integral Management System | Compliance Officer / HSE & CSR Coordination | According to the audit schedule | Attending the audit and maximum collaboration with the requirements of the audit team |
| ACT | 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. |

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| | | 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. |

6.2 INSTRUCTIONS FOR COMPLETION OF THE CONSOLIDATED FORMAT FOR CONSULTATION AND VERIFICATION OF ML/FT DATABASES AND LISTS IN-AZP02-F01

- **CONSECUTIVE:** The consecutive is recorded as appropriate (1, 2, 3...etc.)
- **NAME OF THE PERSON RESPONSIBLE FOR CARRYING OUT THE CONSULTATION:** The name of the Insurcol official who performs the verification and consultation is recorded in the ML/FT database.
- **AREA:** The area of the Insurcol official who performs the verification and consultation is recorded in the ML/FT database.
- **DATE OF THE CONSULTATION:** The date on which the verification and consultation is carried out in the ML/TF database is recorded.
- **OBJECTIVE COUNTERPART OF THE CONSULTATION:** This item lists the counterparty for which the verification and consultation is carried out in the ML/TF database, selecting from the drop-down list if it corresponds to:
 - Shareholder
 - Partner
 - Supplier
 - Customer
 - Worker
 - Aspiring to Work
- **ID/CC/NIT:** It is marked with an (X) in the box determining if the document number of the worker, client or supplier corresponds to (ID-CC-NIT).
- **NAME OF THE CLIENT / EMPLOYEE / SUPPLIER: This item lists the name (as appropriate) and number of the document as appropriate:**
 - -Number / Assigned Code (ID)
 - - Citizenship card (CC)
 - - Tax Identification Number (NIT)
- **RESULT (Report +/-):** Based on the query made in the ML/FT database, it is marked with an (X) if the report generated was positive or negative.
- **ROI:** It is recorded with an (X) if the report was generated by any Insurcol official and report to the quality coordinator.
- **ROS:** It is recorded with an (X) if the report was generated by the compliance officer to the UIAF.
- **RONs:** Recorded with an (X) if the generated report is not suspicious.
- **OBSERVATIONS:** The corresponding observations are recorded, leaving clarity on the type of report generated.

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6.3 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/gSkkvpDol89aORiq2C8LI3z9uHAnBFaF08/32nPrGQhH4HhIkYJHgMD30HMsetl+/9E7geoLvRxafJkUC15pg/jWnZSZm15ZVipvVlkwZR+ZjqHUuiB4weW8T9vSbEQL83gQVd8FjppjXh+k1KLUJXaPEX8tf3eHevJgIDWDAm6iToJf2cdTL4D&tpo=2>
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

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 | HSE Server / Folder 100. SARLAF / Folder per year | 1 year | General Inactive | Limitless | Compliance Officer |