

**PROCEDURES MANUAL OF THE INTEGRATED SELF-CONTROL AND RISK MANAGEMENT SYSTEM OF  
AML/CFT/CPF – SAGRILAFT**

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## INTRODUCTION

Canal Clima S.A.S (Canal Clima or the “Company”), has voluntarily decided to implement the SAGRILAF T Procedures Manual, which establishes provisions, policies, mechanisms, and procedures for the activities carried out in each of its processes, for the prevention of the risk of Money Laundering, terrorism Financing, and the Financing of the Proliferation of Weapons of Mass Destruction.

### Main Objectives

- a) Defining all the procedures for the design, approval and supervision of SAGRILAF T-CPF.
- b) Stablish the organizational structure of SAGRILAF T, by the regulating potential Conflicts of Interest and role assignment and responsibilities to areas and processes.
- c) Define the Risk Management Model of AML/CFT/CPF.
- d) Define Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) measures in accordance with the established risk segmentation.
- e) Establish guidelines for the identification of Unusual and Suspicious Transactions related to Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (ML/TF/PF).
- f) Define the framework for effective communication and training programs aimed at fostering a culture of compliance through the ML/TF/PF risk self-control system.
- g) Adopt mechanisms to ensure the immediate and adequate reporting to the competent authorities and regulatory bodies, as well as to the Company’s internal governance bodies, of any activity deemed to constitute an Unusual or Suspicious Transaction.

### 1. Definitions

Terms capitalized in this document and requiring a specific definition are in the Glossary attached in this document.

### 2. Scope

This Manual is addressed to Senior Management, Directors, Employees, Shareholders, and Counterparties of Canal Clima. Its application and compliance are mandatory. Lack of knowledge of its content or procedures may not be invoked as justification for any conduct that deviates from its provisions.

### 3. General Policies of the SAGRILAFT – FPADM

The Board of Directors adopts the policies that constitute the framework of the SAGRILAFT-FPADM and that evidence Senior Management's commitment to implementing effective anti-money laundering and counter-terrorist financing and counter-proliferation financing measures, in accordance with the AML/CFT/CPF Risk Prevention Policy, with the following scope:

- **A Risk-based Approach** is applied, whereby the level of risk associated with Counterparties and transactions is proportional to the measures implemented for their identification, due diligence, and monitoring.
- The provisions, stages, and elements of the System form part of the **Company's Compliance Culture**. All Employees are required to be familiar, comply and apply them. In the event of non-compliance, the corresponding disciplinary measures shall be enforced.
- **Cash transactions** with Counterparties are strictly prohibited.
- A framework is established for the identification and **reporting of Suspicious Transactions** or warning signs to the competent authorities, recognizing the obligation to maintain **strict confidentiality**.
- A strict segregation of roles and responsibilities is maintained among the parties and areas responsible for the direction, oversight, and control of the System. For this purpose, potential **Conflicts of Interest** are regulated, and a regime of **disqualifications and incompatibilities is established**

### 4. Organizational Structure

The operation of the SAGRILAFT-FPADM requires the participation of those responsible for the processes established by the Company for prevention, control and monitoring. Their ongoing interaction is critical to ensuring the proper functioning, compliance, and effectiveness of the SAGRILAFT-FPADM.

At Canal Clima, guidelines are established for the prevention and resolution of Conflicts of Interest that may arise in the assignment of functions and responsibilities for the proper design, implementation, and monitoring of the SAGRILAFT-FPADM.

Accordingly, to clearly assign responsibility for the performance of duties and functions related to the execution of the various stages, elements, and other activities associated with the SAGRILAFT-FPADM, the following directives are defined:

#### 4.1 Conflict of Interest Regime for SAGRILAFT

Canal Clima regulates potential Conflicts of Interest that may arise among those responsible for the design, implementation, and monitoring of the SAGRILAFT-FPADM. To this end, it establishes a clear segregation of roles and responsibilities among the governing, management, control, and monitoring bodies as follows:

- The legal Representative and the Compliance Officer are responsible for the design and implementation of the SAGRILAFT/FPADM, and its approval rests with the Board of Directors.

- Operational and functional processes must integrate effective AML/CFT/CPF risk management through the application of Counterparty due diligence measures at the inception and throughout the duration of the relationship, as well as through the timely detection and reporting of any **Unusual Transactions** identified.
- The Compliance officer is responsible for ensuring the effective operation of the SAGRILAFT/FPADM. For this purpose, the compliance officer carries out oversight and monitoring activities within operational and functional processes, consolidates relevant information, responds to inquiries and reports to the Supervisory Authorities.
- Internal and external audit functions are responsible for providing assurance regarding improvement actions related to operational and functional processes.

## 4.2 Disqualifications and Incompatibilities

In accordance with applicable regulations, the following rules are established to prevent Conflicts of Interest:

1. No individual holding a management, executive, or control position may assume the responsibilities of the compliance officer for the management of the SAGRILAFT
2. Specifically with respect to the profile of the Compliance Officer, the following individuals may not serve in such capacity:
  - Shareholders
  - Members of the Board of Directors
  - Legal Representatives
  - Internal Auditors
  - Statutory Auditors (External Auditors)
  - Individuals responsible for administrative or business areas
  - Individuals who have a kinship relationship by blood or civil relationship with members of the Board of Directors or the Legal Representative

Any person who, within the last two (2) years, has held a position in public entities responsible for inspection, supervision, control or sanctioning of Money Laundering and Terrorist Financing offenses, such as the Superintendencia de Sociedades, the Unidad de Información y Análisis Financiero (UIAF), the Attorney General's Office (Public Prosecutor's Office), or Criminal Court Judges.

## 4.3 Roles and Responsibilities

### 4.3.1 Board of Directos

The Board of Directors is the body responsible for implementing and overseeing the AML/CFT/CPF self-control and risk management system, providing strategic direction to the Company's management with respect to the proper management of such risks. Its functions include:

- a) Establishing and approving the AML/CFT Risk Prevention Policy under the SAGRILAFT framework.

- b) Approving the SAGRILAFT-FPADM and any updates thereto, as submitted by the Legal Representative and the Compliance Officer.
- c) Approving this SAGRILAFT-FPADM Procedures Manual and any updates.
- d) Selecting and appointing the Compliance Officer and the respective alternate, after verifying that the Compliance Officer has the availability and capacity required to perform the assigned duties.
- e) Timely reviewing, through the Audit and Conflicts of Interest Committee, the reports on the operation of the SAGRILAFT-FPADM, as well as proposals for corrective actions and updates submitted by the Compliance Officer and making decisions on all matters addressed therein. Such decisions shall be recorded in the minutes of the corresponding governing body.
- f) Timely reviewing the reports and requests submitted by the Legal Representative.
- g) Issuing statements regarding the reports submitted by the Statutory Auditor or the internal and external auditors concerning the implementation and operation of the SAGRILAFT-FPADM and monitoring the observations or recommendations included therein. Such follow-up and its periodic progress shall be recorded in the corresponding minutes.
- h) Approving and allocating the technical, logistical, and human resources necessary to implement and maintain the effective operation of the SAGRILAFT-FPADM, in accordance with the requirements submitted by the Compliance Officer.
- i) Establish the criteria for approving the onboarding of a Counterparty classified as a Politically Exposed Person (PEP), in accordance with the provisions set forth in this Manual or its annexes (Due Diligence Procedure). In such cases, the Compliance Officer shall determine the applicable criteria and authorize the onboarding.
- j) Establish guidelines and determine the parties responsible for conducting audits on the compliance and effectiveness of SAGRILAFT, where deemed necessary.
- k) Verify that the Compliance Officer and the Legal Representative comply with Chapter X of the Basic Legal Circular issued by the Superintendencia de Sociedades, as well as with the provisions of this Manual, through the review of the reports submitted jointly by the Compliance Officer and the Legal Representative, in accordance with the frequency established herein.

#### **4.3.2 General Manager**

In their capacity as a Legal Representative, the following functions shall apply:

- a) Submit, jointly with the compliance officer, for approval by the Board of Directors, the proposed AML/CFT Risk Prevention Policy under the SAGRILAFT framework and any updated, as well as this procedures Manual.

- b) Review the results of the AML/CFT/CPF risk assessment conducted by the compliance officer and, together with the Board of Directors, establish the corresponding action plans.
- c) Efficiently allocate the technical and human resources determined by the Board of Directors.
- d) d) Verify that the Compliance Officer has the availability and capacity required to perform his/her duties.
- e) Certify that the Compliance Officer meets the requirements set forth in Chapter X of the Basic Legal Circular within fifteen (15) days of his/her appointment or ratification.
- f) Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the SAGRILAFT-FPADM, by approving or allocating the necessary technical, logistical, and human resources required for the performance of such functions.
- g) Certify to the Superintendencia de Sociedades compliance with the provisions of Chapter X of its Basic Legal Circular, when requested by Superintendence.
- h) Respond to requests from the Unidad de Información y Análisis Financiero (UIAF), the Superintendencia de Sociedades, and shareholders regarding AML/CFT/CPF matters.
- i) Verify that the procedures of the SAGRILAFT-FPADM implement the AML/CFT Risk Prevention Policies adopted by the Board of Directors.
- j) Submit to the Board of Directors, through the Compliance Officer, reports, requests, and alerts deemed necessary for the Board's review, related to SAGRILAFT.
- k) Ensure, through the Compliance Officer, that activities resulting from the implementation of the SAGRILAFT are properly documented, so that the information is complete, reliable, available, effective, efficient, and confidential.

### 4.3.3 Compliance Officer and Alternate

Compliance Officer Profile:

The Compliance Officer and Alternate must meet the profile established by the applicable regulations, specifically External Circular No. 100-000016 of December 24, 2020.

The Compliance Officer is responsible for executing and monitoring the AML/CFT/CPF self-control and risk management system. In the event of temporary or permanent absences, the Alternate shall assume the role.

The Compliance Officer shall be responsible for the following functions:

- a) Ensure the effective, efficient, and timely compliance with the SAGRILAFT-FPADM.

- b) Submit to the Audit and Conflicts of Interest Committee, delegated by the Board of Directors, at least four times per year, in accordance with its bylaws, reports on: (i) the assessment and analysis of the efficiency and effectiveness of the SAGRILAFT-FPADM, and if applicable, propose the corresponding improvements (ii) the results of the Compliance Officer's management, and the Company's overall management, in compliance with the SAGRILAFT-FPADM.
- c) Promote the adoption of corrective actions and updates to the SAGRILAFT-FPADM, when circumstances require, at least once every two (2) years. For this purpose, proposals and justifications for the suggested corrective actions and updates shall be submitted to the Board of Directors.
- d) Coordinate the development of internal training programs. Disseminate and train Company employees according to the level of criticality, covering the main topics of the compliance program. Maintain records of training or induction, attendance lists, and corresponding evaluations.
- e) Evaluate reports submitted by internal and external audits, if applicable, and adopt **Reasonable Measures** to address identified deficiencies. If measures require authorization from other bodies, ensure that these matters are submitted to the competent authorities.
- f) Certify to the Superintendencia de Sociedades compliance with Chapter X of the Basic Legal Circular, as requested by Superintendence.
- g) Verify compliance with **Due Diligence and Enhanced Due Diligence** procedures applied by the Company in processes related to Counterparties.
- h) Ensure the proper filing of supporting documentation and other information related to the management and prevention of AML/CFT/CPF risk, in accordance with Section 6.4 (Document Management Procedure) of this document.
- i) Design methodologies for the classification, identification, measurement, and control of AML/CFT/CPF risk that will form part of the SAGRILAFT.
- j) Conduct the AML/CFT/CPF risk assessment to which the Company is exposed.
- k) File **Suspicious Transaction** Reports with the Unidad de Información y Análisis Financiero (UIAF) and any other reports or statements required under applicable regulations, in accordance with such regulations and Chapter X of the Basic Legal Circular of the Superintendencia de Sociedades..

#### 4.3.4 Internal and External Audit

The following functions shall apply for the AML/CFT/CPF System:

- a) Include in their annual audit plans a review of the effectiveness and compliance of the AML/CFT/CPF Risk Management System, to provide a basis for the compliance officer and the Company to identify deficiencies in the system and determine potential solutions.

- b) Communicate the results of such internal audits of the Legal Representative, the compliance officer and the Board of Directors or the highest governing body:

Specifically, the Statutory Auditor will have the following functions established by law:

- a) Should the Statutory Auditor detect, during the ordinary course of duties, any **Suspicious or Attempted Transaction** related to AML/CFT/CPF risk, it must be reported to the UIAF.
- b) File the corresponding criminal complaint if a Money Laundering or Terrorist Financing offense is identified.

#### 4.3.5 Employees

Employees are responsible for the following:

- a) Comply with the policies and procedures established in this Manual and its annexes.
- b) Implement **Due Diligence and Enhanced Due Diligence** measures, as applicable, in the processes of onboarding Counterparties under their responsibility.
- c) Identify and report to the Compliance Officer any Unusual Transactions or red flags arising from daily activities in dealing with Counterparties.
- d) Attend mandatory training sessions provided.

### 5. Procedures

#### 5.1 Design and Approval Procedures. Updates

The design and subsequent updates of the AML/CFT/CPF Risk Management System are the responsibility of the Compliance Officer.

The design or update of the System is based on regulatory guidelines, in this case issued by the Superintendencia de Sociedades, which supervises and regulates Canal Clima, as well as self-regulatory sources contained in technical standards, particularly those issued by **GAFI**.

The design of the System must reflect a Risk-Based Approach (RBA or EBR) through a risk management model for AML/CFT/CPF, allowing identification, evaluation, control, and monitoring to prevent materialization of risks in operations and interactions with Counterparties. It should integrate:

- The objectives of Canal Clima
- How these objectives are to be achieved
- The context in which the Company operates
- Identification of third parties with whom the Company engages for its operations
- Identification of threats, understood as external factors that may expose the Company to AML/CFT/CPF events, and
- Vulnerabilities related to internal factors.

The AML/CFT/CPF Risk Management System project must be submitted jointly by the General Manager and the Compliance Officer to the Board of Directors for approval. Approval must be recorded in the minutes of the corresponding meeting.

This procedure also applies when the AML/CFT/CPF Risk Management System is updated and shall take place at least once every two years, without prejudice to earlier updates being required due to changes in regulation, business model modifications, or other relevant circumstances.

## 5.2 Monitoring and Supervision Procedure

In order to maintain an effective operational level of the System and identify necessary improvements, monitoring of the System's operation is the responsibility of the Compliance Officer, or in the event of temporary or permanent absence, the Alternate.

Monitoring and supervision activities are conducted continuously over the operation of the AML/CFT/CPF Risk Management System. For this purpose, the Compliance Officer may perform random checks with the processes responsible to verify:

- Compliance with Due Diligence and Enhanced Due Diligence procedures, where applicable.
- Application of treatment for Unusual Transactions.
- Onboarding and monitoring of Counterparties that represent a high level of risk.

The results of these activities shall be communicated to the responsible party to implement improvements, if necessary.

## 5.3 Training and Awareness Procedure

### 5.3.1 Trainings

The Compliance Officer is responsible for developing the training and awareness plan and, in coordination with the Human Resources department, for delivering training to Employees on the mechanisms for preventing AML/CFT/CPF risks. The following guidelines shall apply:

- Training must be implemented in a manner that ensures the System is fully understood and assimilated by those responsible for its execution. It shall be directed to Employees in functional and operational processes who are responsible for interacting with Counterparties. Each training session shall include an assessment to determine adequate knowledge acquisition.
- When a third-party contractor or supplier acts on behalf of CANAL CLIMA or provides an essential service to the Company's operations, they must also receive training on the AML/CFT/CPF Risk Management System to ensure the effective alignment of their internal processes with the System.
- Training shall include both theoretical and practical components and cover, at a minimum, the following topics:

i) Explanations of the system's operation and its organizational structure.

ii) Identification of Unusual or Suspicious Transactions, including when and what to report, and the reporting channels to be used.

- Training shall be incorporated into employee induction processes and may also be conducted semi-annually to ensure that all personnel receive the required training.
- Refresher courses or updates on the subject shall be conducted at least once per year.
- Training may be delivered through digital, in-person, or hybrid methods.
- Attendance at training sessions is mandatory for all personnel who are required to participate.
- Records of training must be maintained, including topics covered, attendance, trainer, and evaluation results.

The development and scheduling of trainings shall be established in the Communication and Training Plan.

### 5.3.2 Awareness

The Compliance Officer shall carry out initiatives to communicate the mandatory nature and compliance of the System to Employees and stakeholders of Canal Clima, according to the following guidelines:

- Content shall be disseminated through Canal Clima's internal channels (intranet) and external channels (website).
- Awareness initiatives shall have both an internal and external scope. Internal awareness is directed to Canal Clima personnel with the purpose of strengthening the compliance culture within the Company. External awareness is directed to stakeholders and the public, aiming to align potential Counterparties with the Company's standards and, at the same time, discourage any attempt by third parties to channel illicit funds or assets through transactions with Canal Clima. For this purpose, this Manual, or its relevant contents, shall be published on Canal Clima's website, providing context on the mandatory nature of the AML/CFT/CPF Risk Management System. It may also include components related to internal self-control, the commitment to compliance, and the obligation to report Unusual or Suspicious Transactions.

### 5.4 Document Management Procedure

Documentation related to the operation of the AML/CFT/CPF Risk Management System mainly consists of:

- System Information: This includes, among other relevant documentation regarding the operation of the System:
  - i. Information regarding screenings of individuals against sanctions and watchlists.
  - ii. Reports of Unusual Transactions submitted by functional and operational processes.
  - iii. Reports to the UIAF: Suspicious Transaction Reports (STRs) and AROS.
  - iv. Extracts from Board of Directors appointment minutes.
  - v. Extracts from Board of Directors monitoring minutes.
  - vi. Extracts from minutes approving and updating the System's Policies.
  - vii. Internal and external audit reports.

The collection, use, processing, and updating of personal data, if applicable, is governed by the Personal Data Protection Program implemented at Canal Clima in compliance with Law 1581 of 2012.

System Information is classified as strictly confidential, and the following measures apply:

- i. Access to physical and digital repositories is restricted exclusively to the Compliance Officer.
- ii. As a general rule, circulation of this information is not allowed.
- iii. Disposal of information requires authorization from the Compliance Officer and documentation of the corresponding minutes.

In compliance with the applicable regulations, System Information must be retained for ten (10) years, in any physical or digital medium, provided its reproduction can be guaranteed.

## 5.5 Sanctions Procedure

Any instance of non-compliance with the Policies and procedures of the AML/CFT/CPF Risk Management System by a CANAL CLIMA employee will result in the application of disciplinary sanctions in accordance with the Internal Work Regulations.

The severity of the infraction will be analyzed by Human Resources, General Management, and the Compliance Officer.

Depending on the severity of the infraction, one of the following sanctions may be applied:

- Warning.
- Reprimand.
- Written memorandum.
- Disciplinary suspension.
- Termination of employment for just cause.

Regardless of the analysis of the infraction, the failure to timely report or the lack of reporting of an Unusual Transaction or a Suspicious Transaction constitutes a serious offense.

Disciplinary sanctions under the Internal Work Regulations do not exclude or exempt the responsible party from civil or criminal penalties that may apply.

## 6. RISK MANAGEMENT MODEL

The model establishes a risk management methodology composed of systematic and interrelated steps through which AML/CFT/CPF risks are managed.

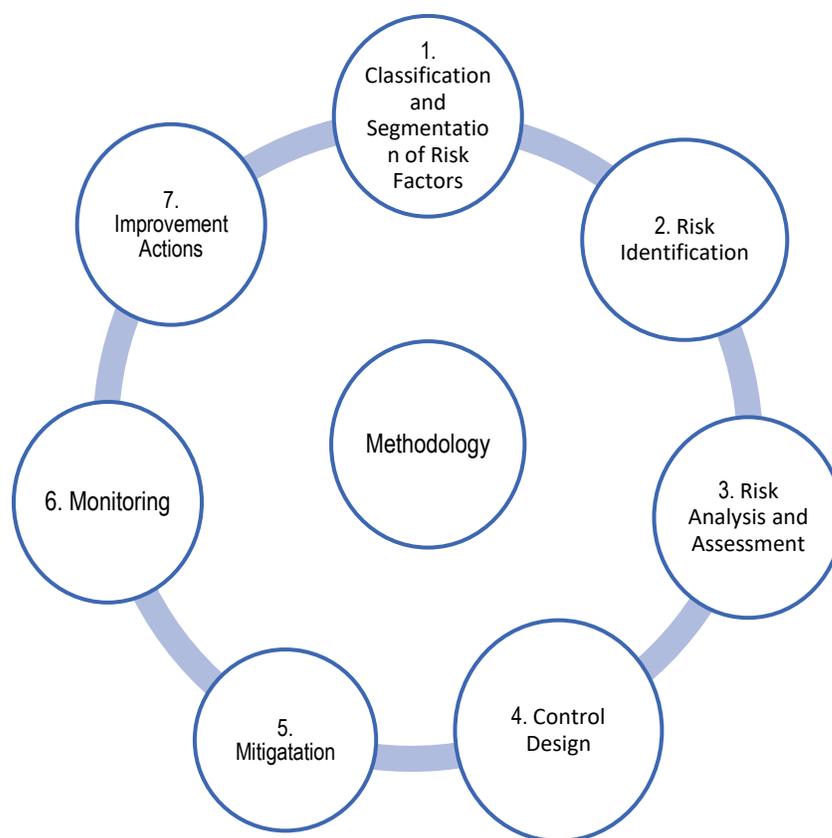
The model consists of five (5) phases, namely:

- a. Identification
- b. Measurement
- c. Control
- d. Monitoring
- e. Improvement

To manage each of these phases an **AML/CFT/CPF Risk Matrix** and a heat Map will be used, enabling the integration and documentation of the activities carried out in each phase.

As a development methodology, the following steps will be addressed, the evaluation of which is continuous and recurring:

1. Classification and Segmentation of Risk Factors
2. Risk Identification
3. Risk Analysis and Assessment
4. Control Desing
5. Mitigation
6. Monitoring
7. Improvement Actions



### 6.1 Classification and Segmentation of Risk Factors

The classification is carried out through an understanding of the dynamics of all businesses and areas managing the operations of Canal Clima, as well as the internal and external relationships established by the Company, through a diagnostic process based on structured interviews with experts from each area. This allows access to the knowledge of those responsible for executing the operations and activities inherent to Canal Clima.

Based on this understanding, the risk factor and segmentation criteria described in Annex 1 “Risk Profile Segmentation” of the “Due Diligence and Segmentation Procedure” are identified.

### 6.1.1 Segmentation.

The application of a **Risk-Based Approach (RBA or EBR)** determines the proportionality of measures according to the level of risk represented by each factor and sub-factor.

For this purpose, segmentation variables are identified to distinguish, within a given homogeneous group, specific characteristics that allow the identification of higher levels of exposure to AML/CFT/CPF risks in certain subgroups.

For Canal Clima, the segmentation variables to be considered for the application of enhanced measures in the knowledge and monitoring of relationships with Counterparties are established in the Annex on Segmentation and Risk Profiles of the “Due Diligence and Segmentation Procedure.”

### 6.2 Identification of Risk Events.

To identify risk events, the Company relied on interviews with process owners and prepared a list of potential risk events; that is, incidents or occurrences derived from internal or external sources that may generate risks associated with AML/CFT/CPF.

This list of events is based on internal analysis (the Company’s experience using typology analysis and Unusual Transactions, as well as documentation and recommendations on the prevention of AML/CFT/CPF).

Once the list of events was identified, an analysis was conducted considering possible causes. This makes it possible to identify the circumstances that could materialize the risk and that must be controlled to prevent their occurrence.

The risk identification stage must be carried out in advance whenever there is a modification of risk factors, such as entering a new market through an investment or initiating operations in new jurisdictions.

### 6.3 Risk Analysis and Assessments

The analysis of AML/CFT/CPF risks involves measuring the probability or likelihood of occurrence of the risk inherent to the activity, as well as the impact should it materialize through associated risks.

Impact consequences and probabilities are combined to produce the risk level.

For risk measurement, the following measurement levels and corresponding criteria are used, which may also be applied by a group of experts with experience and knowledge of the sector in which the

Company operates, and who are also familiar, both retrospectively and prospectively, with its dynamics and evolution.

PROBABILITY		
Qualification	Descriptor	Description
5	Imminent	May occur in 90% or more of cases. May occur within the company.
4	Very Likely	May occur in 70% to 89.9% of cases. May occur within the sector.
3	Likely	May occur in 50% to 69.9% of cases. May occur in a sector related to the Company's line of business.
2	Unlikely	May occur in 25% to 49.9% of cases. May occur in other sectors.
1	Remote	May occur in less than 0.1% to 24.9% of cases. There is no known record of occurrence.

IMPACT					
Qualification	Descriptor	Operative	Economic	Legal	Reputational
5	Very High	Closure of operations for more than 30 days or permanent shutdown	Losses equal to or greater than 5% of equity.	Administrative liability of the legal entity. Imprisonment of Legal Representatives or Employees.	Media exposure > 30 days. Extensive international coverage.
4	High	Temporary closure of operations for up to 30 days	Losses ranging from 1% to 4.99% of equity.	Administrative fines imposed on Legal Representatives or Employees.	Media exposure < 30 days. Extensive regional or national coverage.
3	Medium	Partial closure of operations for up to 29 days.	Losses ranging from 0.5% to 0.9% of equity.	Internal disciplinary measures, including termination for just cause.	Media exposure < 15 days. Event disclosed locally on an isolated basis.
2	Low	Partial closure of operations	Losses ranging from 0.1% to 0.49% of equity.	Internal disciplinary measures or	Known and addressed at the Company level.

		for up to 15 days		administrative requirement.	
<b>1</b>	Very Low	Partial closure of operations for up to 7 days	Losses of less than 0.09% of equity.	Response to an administrative requirement.	Known and addressed internally within a specific area or work team.

The results of the application of these criteria are consolidated; however, the **Coefficient of Variation** is also used as a statistical measure which, in the context of Risks, helps determine the level of dispersion among the individual opinions of each of the experts who applied the voting criteria for each risk. In the event that the coefficient of variation is very high (>70%), the experts must conduct the voting process again in order to reach consensus.

For this purpose, the results of multiplying probability and impact magnitude are plotted on a heat map, where inherent risks can be observed according to their level of exposure or severity as low, moderate, high, or extreme.

#### 6.4 Controls

Understood as **Reasonable Measures**, controls must be designed according to the level of risk, recognizing that the higher the risk, the more robust the controls must be. Their design must ensure that the control is sufficient, appropriate, and measurable. Accordingly, the following criteria are established to address these attributes.

*Sufficiency:*<sup>1</sup> **Determined by the combination of the form and type of control:**

Form	Description
Manual	Controls in which one or more individuals are involved in their execution.
Semi-automated	Controls that involve a combination of an information system and the execution of activities by one or more individuals.
Automated	Controls in which an information system operates from start to finish and does not require any human intervention for their execution or verification.

<sup>1</sup> Cambridge: noun. an amount of something that is enough, or the quality of being good enough

Control Type:

Type	Description
Preventive	Controls that reduce the causes generating risks, thereby decreasing the frequency with which they occur.
Detective	Controls that identify the causes of risks after incidents have occurred. In a way, they serve to assess the effectiveness of preventive controls.
Corrective	Controls that correct errors, omissions, or malicious acts once they have been detected.

From the combination of the form and type of control, sufficiency is assessed as follows:

Forma de control	Tipo de control	Combination	Calcification
Automated	Preventive	Automated and Preventive	5
Semi-automated	Preventive	Semi-automated and Preventive	4
Manual	Preventive	Manual and Preventive	3
Automated	Detective	Automated and Detective	4
Semi-automated	Detective	Semi-automated and Detective	3
Manual	Detective	Manual and Detective	2
Automated	Corrective	Automated and Corrective	4
Semi-automated	Corrective	Semi-automated and Corrective	3
Manual	Corrective	Manual and Corrective	2

### Appropriate: <sup>2</sup>

For the determination of this attribute, the following criteria are applied with their respective assessments:

	The control addresses the cause of the risk.	The control is applied within the process cycle (Implemented).	Evidence of the results of its application maintained (Documented).	Are the controls currently being applied (operating effectiveness)?	Does the control require improvements?
YES	5	5	5	5	0
NO	0	0	0	0	5

<sup>2</sup> Cambridge Adj. suitable or right for a particular situation or occasion

From the evaluation of controls, a control can be classified as:

- (i) **Strong:** Controls are adequate and operate correctly.
- (ii) **Moderate:** Weaknesses exist in their design and/or implementation, requiring modifications— opportunities for improvement.
- (iii) **Weak:** Controls are not at an acceptable level.

Any recommendations generated must be managed by the process owners.

### 6.5 Mitigation

Due to the nature of AML/CFT/CPF risks, the effectiveness of controls influences the probability of their occurrence, resulting in the following residual risks:

RESULTING PROBABILITY ACCORDING TO % OF CONTROL MITIGATION	INITIAL PROBABILITY	IF IT MITIGATES MORE THAN 0,74	IF IT MITIGATES BETWEEN 0,74 and 0,51	IF IT MITIGATES LESS THAN 0,51
	REMOTE	REMOTE	REMOTE	REMOTE
UNLIKELY	REMOTE	REMOTE	REMOTE	UNLIKELY
LIKELY	REMOTE	UNLIKELY	UNLIKELY	LIKELY
VERY LIKELY	UNLIKELY	LIKELY	LIKELY	VERY LIKELY
IMMINENT	LIKELY	VERY LIKELY	VERY LIKELY	IMMINENT

### 6.6 Monitoring

Once the residual risks have been determined, the system must be monitored for improvement. In this regard, risks and, in general, the model itself must be continuously tracked.

For this purpose, the heat map should be analyzed, considering the effect of controls on inherent risk, according to the following guidelines:

Residual Level	Severity	Policy	Treatment
Extreme		Under no circumstances is a risk of this level acceptable. Therefore, any activity where a risk event of this level occurs will be suspended while the appropriate treatment is applied. These risks require high-priority attention from the management responsible for the event to immediately reduce its severity.	Immediate action required; treatment plans must be implemented and reported to the Board of Directors and Legal Representative.
High		Requires priority actions in the short term by directors and managers responsible for the areas or processes where the event	Must be addressed within three (3) months of identification through treatment plans implemented and

	occurs, due to the significant impact it could have on the Company.	reported to the corresponding directors.
Moderate	Activities must be carried out to manage this risk in the medium term by assistants or area coordinators where the event occurs.	Acceptable risk managed with standard control procedures; treatment required within six (6) months of identification, reported to the corresponding directors.
Low	The risk has low severity and does not justify additional resource investment. Current actions should be maintained to keep the risk level. These risks are monitored and reviewed quarterly to ensure the level has not increased.	Managed with routine procedures. Insignificant risk; no action required.

Based on the results obtained in the previous phase, an effective follow-up process must be conducted to facilitate the rapid detection and correction of model deficiencies, at least annually, ensuring that controls cover all risks and operate in a timely, effective, and efficient manner. During this phase, the Compliance Officer must monitor the established risk profile.

This Monitoring stage comprises the following activities:

- Ensure that residual risks remain within the acceptance levels established by Canal Clima.
- Perform risk monitoring by measuring risks in accordance with the established methodology. Likewise, mitigation controls will be measured to verify their sufficiency and timeliness.
- Based on this new measurement, risk variations will be determined in order to assess their overall behavior.
- These variations will be analyzed by risk factor and associated risk over different time periods, as well as the mitigation achieved during the same period. Improvement plans will be developed according to the results obtained.
- Ensure that controls for all risks are comprehensive by performing an evaluative review according to their nature, considering manual, automated, and technology-dependent controls.
- Monitor and compare **Inherent Risk and Residual Risk** for each risk factor and associated risks, such as **Strategic Risk, Reputational Risk, Legal Risk, and Operational Risk**.
- Establish descriptive and/or forward-looking indicators that evidence potential sources of risk.
- Assess the relevance of the indicators.
- Analyze the data reported through the indicators.
- Evaluate the results of the indicator diagnostics and follow up compared to previous results.
- Communicate the results to the manager responsible.
- Prepare a report on the results generated.
- 

Likewise, when Canal Clima enters new sectors, it must assess the related risks, including AML/CFT/CPF risks. For this purpose, the Compliance Officer, with the support of the person responsible for the new business, will conduct the analysis and document the corresponding record.

Based on the monitoring plan defined, the Compliance Officer will periodically test the controls included in the matrix, considering their frequency and risk level. The Officer will perform operating effectiveness testing by selecting samples at their discretion or by reviewing the full population of control records to be tested. Based on the results, feedback will be provided to the control owners when necessary.

## 6.7 Improvement Actions

The consolidation of improvement actions corresponds to a formal and documented process, coordinated by the Compliance Officer for the purpose of implementing actions aimed at reducing the severity level of residual risks.

This stage must be carried out prior to the launch of any new line of business, modification of its characteristics, entry into a new market, or commencement of operations in new jurisdictions.

The following sources shall be considered for improvement actions:

- Records of Unusual or Suspicious Transactions.
- Reports of transactions submitted to the Compliance Officer (confirmed events). In this regard, all Employees must be trained to detect irregularities in the Entity's operations and report them to the Compliance Officer.
- Audit and Statutory Auditor's reports.
- Documented significant experiences.
- Management reports.
- Documentation issued by regulatory authorities.
- Requests from authorities.
- Media reports.
- Information reported by the Entity's areas.
- Typology and Unusual Transactions documents issued by the UIAF.
- Recommendations issued by the GAFI.

Furthermore, in order to identify risks for which there is no written evidence, the DELPHI methodology (Helmer & Gordon) may be used through open surveys addressed to individuals knowledgeable about the environment in which Canal Clima operates. These individuals present their views through self-assessment questionnaires structured by the Compliance Officer, allowing the collection of expert input to identify risks recorded in the AML/CFT/CPF Risk Matrix.

The selection of employees participating in the survey is based on their experience and knowledge of the processes or business lines under evaluation. If this methodology is applied, at least two (2) successive surveys shall be conducted in order to achieve consensus among the opinions expressed.

The Improvement Action Plan identifies responsibilities, timelines, proposed actions, and the established review process.

To ensure effective monitoring of the strengthening of controls aimed at reducing the frequency and impact of risks, the Compliance Officer records the Improvement Action Plan in the Matrix.

## 7. Transactions or Warning Signs – Procedure for Their Handling

In order to evaluate and analyze the operations, businesses, and contracts carried out by Canal Clima, a procedure is established—among other mechanisms—to enable the identification of Unusual Transactions or red flags and their corresponding handling. This consists of applying additional measures or controls which, if the transaction cannot be reasonably justified, allow for the classification of the matter as a Suspicious Transaction or an Attempted Transaction.

As guidance, the following Unusual Transactions and red flags are listed, without prejudice to the fact that Employees responsible for relationships with Counterparties may identify additional ones:

### a) Regarding transactions or activities with Counterparties related to:

- (i) Natural or legal persons who are not fully identified
- (ii) Shareholders or Employees with judicial records related to AML/CFT
- (iii) New shareholders accepted or onboarded without prior verification of the origin of the funds contributed
- (iv) Frequent changes in the Counterparty's contact or address information
- (v) Inconsistencies identified during supplier verification related to corporate name, tax identification number (NIT), or registered address.

### b) Regarding transactions, businesses, or contracts that represent, involve, or are related to:

- i. High volumes of cash without apparent justification, or in general any cash payment to suppliers or third parties
- ii. Movable or immovable property at prices significantly different from normal market values
- iii. Donations without an apparent Beneficial Owner, with unknown origin, or domiciled in a High-Risk Country, Jurisdiction, or Zone
- iv. Significant transactions, businesses, or contracts not documented in writing
- v. Payments derived from international wire transfers originating from multiple senders to a single beneficiary, or from one sender to multiple recipients, without apparent relationship
- vi. Commercial transactions or businesses with individuals or entities included on Restricted Lists
- vii. Transactions executed with Counterparties domiciled or located in **High-Risk Jurisdictions or Zones**
- viii. Transactions involving Products derived from illegal activities (including, among others, smuggling)
- ix. Transactions involving Products that have not been properly nationalized; and
- x. Transactions involving restricted-sale Products without the required authorizations or licenses.

### **c) Employees and collaborators:**

- i. Job applicants who fail to provide employment references from previous or current positions, or who refuse to provide general information (family, contact details, etc.)
- ii. Acquisition of assets or engagement in activities inconsistent with the individual's income level
- iii. Frequent changes of residence.

#### **7.1 Handling:**

In the event of an Unusual Transaction or red flag, the responsible Employee must apply an additional control or measure appropriate to the transaction in order to obtain a reasonable justification.

Among the additional measures to be applied are the following:

- Expansion or request for additional information.
- Application of Enhanced Due Diligence.
- Verification through other information sources.

Personnel responsible for the processes must timely report Unusual Transactions to the Compliance Officer in order to apply the proposed additional control.

If doubts persist after applying the control or additional measure, the transaction must be categorized as a **Suspicious Transaction**.

Employees responsible for the processes must report to the Compliance Officer and their immediate supervisor any Unusual, Attempted, or Suspicious Transaction.

Failure to report in a timely manner, or failure to report at all, constitutes serious misconduct and shall be reported to Human Resources for the corresponding actions.

The Compliance Officer shall receive internal reports submitted by process owners in order to analyze the Unusual or Suspicious Transactions received and determine the appropriate course of action, involving the necessary areas or third parties as required.

## **8. Mechanisms for the AML/CFT/CPF System**

### **8.1 Due Diligence**

In accordance with the Due Diligence process guidelines, proportionate knowledge measures are applied based on the risk level of Counterparties, in line with the established segmentation matrix.

Accordingly, the higher the risk, the more stringent the measures applied to establish a relationship with a Counterparty, corresponding to **Enhanced Due Diligence**.

This is regulated under the Due Diligence and Segmentation Procedure defined by Canal Clima, which complements the Company's functional and operational processes. Therefore, Due Diligence measures must be applied by the areas responsible for procurement and contracting.

The designated forms must include:

- Declarations of source of funds.
- Full identification of beneficial owners in the case of legal entities or similar arrangements such as trusts or temporary consortia.
- Identification of whether the individual qualifies as a Politically Exposed Person (PEP), if applicable.

## 8.2 Politically Exposed Person (PEP) Status

Within the procedure for knowing any Counterparty, it is mandatory to determine whether the Counterparty qualifies as a PEP, in accordance with the definition set forth in the Compliance Glossary.

### 8.2.1 Guidelines

Forms for the creation or update of third parties must include options enabling the Counterparty to disclose whether they qualify as a PEP, either as a natural person or, in the case of legal entities, whether any of their partners, shareholders, legal representatives, or Board members qualify as PEPs.

When PEP status is verified, Enhanced Due Diligence measures shall be applied during the onboarding or updating process of the Counterparty.

Enhanced Due Diligence for PEPs shall extend to:

- (i) the spouses or permanent partners of the PEP
- (ii) relatives of the PEP up to the second degree of consanguinity, second degree of affinity, and first civil degree
- (iii) associates of a PEP, when the PEP is a partner of or associated with a legal entity and, in addition, directly or indirectly owns more than 5% of the legal entity or exercises control over it, pursuant to Article 261 of the Commercial Code.

The Compliance Officer shall determine whether to establish or maintain a relationship with a PEP or with an entity related to a PEP, primarily considering whether there are any records related to predicate offenses of AML/CFT or corruption matters.

## 8.3 Identification of the Ultimate Beneficial Owner

Within the Counterparty due diligence process, it is mandatory to identify the Ultimate Beneficial Owners, in accordance with the applicable regulation and the definition contained in the Compliance Glossary.

### 8.3.1 Guidelines

Forms for the creation or update of third parties must include fields designed to identify the Ultimate Beneficial Owners. Once fully identified, the Ultimate Beneficial Owners must be screened against restrictive lists.

Refusal by the Counterparty to identify its Ultimate Beneficial Owners shall be considered a red flag and shall be subject to the treatment indicated in section 8.6.

## 9. Annexes and Complementary Documents

- Policy for the Prevention of Money Laundering and Terrorist Financing Risks.
- Due Diligence and Segmentation Procedure.
- AML/CFT/CPF Risk Matrix.