

SAGRILAFT

Self-Control system and Integral Risk Management of AML/TF/FPWMD



1. What is it?

It is the System of Self-Monitoring and Management of Integral Risk implemented by our company to prevent the risks of:



Anti-Money Laundering (AML)



Financing of Terrorism (FT)



Financing of the Proliferation of Weapons of Mass Destruction (FPWMD)

2. Who is it applicable to?

Knowing and implementing it is mandatory for every counterparty (areas and company employees, suppliers and customers)



3. Reporting Channels



Any employee or counterparty who becomes aware about any situation taking place associated to Anti-Money Laundering, Financing of Terrorism or Financing of the Proliferation of Weapons of Mass Destruction must report it immediately to the Compliance officer through the e-mail:



oficialdecumplimientosagrilaft@cisantabarbara.com

4. Regulatory Agency

The Superintendency of Corporations has established certain requirements or characteristics that require the companies of these economic sectors to implement SAGRILAFT.



4.1 Example of warning flags:

·A supplier who offers goods or services at prices that are considerably different from market prices.



4.2 The company might be affected in case



- An application of affiliation is processed without processing all of the requirements established.
- Any suspicious action or operation is not reported to the compliance officer.
- Cash payments are received. The information supplied is not analyzed.