

OFFICIAL TRANSLATION TRUE TO THE ORIGINAL, PERFORMED ON **SEPTEMBER (19) TWO THOUSAND AND TWENTY-FIVE (2025) IN BOGOTA, D.C. – REPUBLIC OF COLOMBIA**, FROM A DOCUMENT DRAFTED IN SPANISH AND ITS SEALS MADE BY JAVIER RODRÍGUEZ SOTOMAYOR, OFFICIAL TRANSLATOR AND INTERPRETER, ENDORSED BY UNIVERSIDAD NACIONAL DE COLOMBIA, REGISTERED WITH NO. 535, ACTING IN ACCORDANCE WITH THE LEGISLATION AND THE ETHICAL STANDARDS OF THE OFFICIAL TRANSLATOR AND INTERPRETER PROFESSION. CONTACT DETAILS: seatraducciones@outlook.es – +57 3102963111 – Carrera 72bis No. 73-74 Of. 302 Bogotá, Colombia.

SAGRILIFT MANUAL GENERAL
(ADL and COMPANIES)

COUNTERPARTIES GUIDELINES

INTEGRAL RISKS MANAGEMENT

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	Process Integral Risks Management	Subprocess SAGRILIFT	
	Code: TRV-GIR02-OD-01	Version: 02	Date: 07/15/2025

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1. INTRODUCTION

This document sets forth the directives and guidelines to guarantee the compliance with the identification, detection, prevention, report, monitoring and response stages for acts of assets laundering, terrorism funding and the funding of massive destruction weapons proliferation, hereinafter LA/FT/FPADM, which may get to affect the Companies’ image.

2. OBJECTIVES

- To define and enforce proceedings and policies on the expertise of each of the Companies groups of interest, this way managing the legal, reputational, operational and contagion risks.
- To set out the necessary measures to ensure the compliance of the SAGRILIFT policies.
- To convey a guideline to generate a culture of control for the prevention and management of associated risks.
- To identify, analyze and assess the risks associated with the LA/FT/FPADM that are shown as warning signs, and to take control actions to prevent their materialization or to decrease their consequences.

3. SCOPE

This manual applies for all the processes that ADL Digital Lab, Carroya, Metrocuadrado, Seguros ADL and Facilpass, hereinafter “The Companies” have with collaborators, suppliers, shareholders, customers, third parties and intermediaries, and any group of interest for the development of activities avoiding the Company to be used as a means to the LA/FT/FPADM.

4. REGULATORY FRAMEWORK

Colombia has ratified, among others, the following conventions and agreements of the United Nations, in order to face the criminal activities related to the LA/FT/FPADM. Hereunder, we state the name of the convention, the approval act and the constitutionality sentence uttered by the Constitutional Court within the ratification procedure:

- Chapter X of the basic judiciary circular issued by the Superintendence of Societies.
- Vienna Convention of 1988: United Nations Convention Against the Traffic of Narcotics and Psychotropic Substances (Approved by Act 67 of 1993 Sentence C-176 of 1994).



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- United Nations Agreement for the Repression of Terrorism Funding of 1999 (Approved by Act 808 of 2003 Sentence C-037 of 2004).
- Palermo Convention of 2000: United Nations Convention Against Organized Crime (Approved by Act 800 of 2003 Sentence C-962 of 2003).
- Mérida Convention of 2003: United Nations Convention Against Corruption /Approved by Act 970 of 2005 Sentence C 172 of 2006).

5. GENERAL RISK MANAGEMENT POLICY LA/FT/FPADM

The Companies are committed to the proper management of the risks associated with the LA/FT/FPADM, this is why they have implemented a SAGRILAFT system to accomplish the identification, measurement and control of these risks to which companies are exposed in the execution of their activities, likewise, they perform a permanent monitoring through the implementation of good practices for the proper management of the LA/FT/FPADM risks. In addition, the companies develop internal mechanisms to strengthen the culture for the management of the LA/FT/FPADM risk, for which they establish and develop a plan of awareness and training within the company.

6. STAGES FOR THE SAGRILAFT ADMINISTRATION

Hereinafter, the guidelines are described for each of the stages that the Sagrilaf Risk Unit shall consider in the enforcement of the SAGRILAFT methodology for ADL Digital LAB and its companies:

6.1. IDENTIFICATION STAGE

The SAGRILAFT must allow ADL Digital LAB and its companies to identify the LA/FT/FPADM risk factors, as well as the risks associated therewith and, to identify the LA/FT/FPADM risk, it must, as a minimum:

- Classify the LA/FT/FPADM Risk Factors.
- Once the LA/FT/FPADM Risk Factors are identified, segmented and classified, to establish the methodologies to identify the LA/FT/FPADM risk that ADL Digital LAB and its companies may get to face, as well as other potential associated risks.
- To establish the conditions and priority with which the Due Diligence measures must be executed.
- To make available and implement the mechanisms and measures that allow a proper knowledge, identification and individualization of the LA/FT/FPADM Risk Factors

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applicable to the nature of ADL and its companies, considering that the main LA/FT/FPADM risk sources are:

- Collaborators
- Customers
- Suppliers
- Third parties and allies.

6.2. MEASUREMENT STAGE

Once the identification stage is completed, the SAGRILAFT must allow the URS to measure the probability of occurrence of the inherent risk for each of the LA/FT/FPADM Risk Factors, as well as the impact in the event of materializing, these measurements may be of qualitative or quantitative nature. As a result of this stage; the URS must be capable to establish the profile of the inherent risk and of its associated risks.

Within the measurement of the LA/FT/FPADM Risk, the URS must, as a minimum:

- Establish the methodologies for the measurement of the probability and impact of the LA/FT/FPADM Risk.
- Include measurements or evaluations of the LA/FT/FPADM Risk in an individual manner and consolidated for each of the LA/FT/FPADM Risk Factors and the specific risks that were identified.
- Evaluate the LA/FT/FPADM Risk when ADL or its companies offer new products or engage in new markets.

6.3. CONTROL STAGE

The SAGRILAFT must allow the USR to take the reasonable measures for the control of the inherent risk to which it is exposed and, as a result of the controls application, it must be capable of establishing its Residual Risk profile, this is why the control must be translated into a decrease of the materialization probability or of the impact generated by the LA/FT/FPADM Risk.

To control the LA/FT/FPADM Risk, ADL Digital LAB and its companies shall adopt the design of methodologies and the creation of a LA/FT/FPADM Risk Matrix to define the most suitable mechanisms of control and their application to the identified LA/FT/FPADM Risk Factors.

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To control the LA/FT/FPADM Risk, the URS must, as a minimum:

- Apply the methodologies for each of the LA/FT/FPADM Risk Factors.
- Establish controls and tools for the detection of unusual operations and Suspicious Operations, based on the LA/FT/FPADM Risks identified in the classification, segmentation and individualization of the LA/FT/FPADM Risk Factors and in accordance with the LA/FT/FPADM Risk Matrix, taking into account that the greater the risk the greater the control.

6.4. MONITORING STAGE

The SAGRILIFT must allow ADL Digital LAB and its companies to enforce monitoring in respect of the risk profile, and to be able to detect unusual operations and suspicious operations that affect the entity in a legal, reputational, operational or contagion manner. To monitor the LA/FT/FPADM Risk, ADL Digital LAB and its companies must, as a minimum:

- Perform the periodic and comparative monitoring of the Inherent and Residual Ri ks of each LA/FT/FPADM Risk Factor and of associated risks.
- To develop a monitoring process that enables the quick detection and correction of the SAGRILIFT deficiencies, with a periodicity in accordance with the residual risk profile of the entity.
- To ensure that the controls operate in a timely, effective and efficient way, and that they mitigate the identified risks.
- To ensure that Residual Risks are within the acceptance levels set by the Company-.

7. PARTICULAR GUIDELINES ON THE ASSOCIATION AND EXPERTISE OF THIRD PARTIES

One of the main instruments to prevent and control the LA/FT/FPADM Risks to which Companies are exposed, is the enforcement of Due Diligence measures, and this process scope must be appropriate for the nature and size of the business, considering the operations and contracts it carries out or intends to develop, as well as its counterparties, countries and geographical areas of operation, and channels and other particular features.



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7.1. INDIVIDUAL CONSULTATIONS IN RESTRICTIVE, BINDING AND INFORMATIVE LISTS

The owner of the process of association and updating of customers, suppliers, collaborators and/or third parties and intermediaries must perform the individual assessment in restrictive, binding and informative lists, in the case of being a legal person, it must make the assessment of all legal representatives and/or proxies with the faculty of subscribing contracts that appear in the certificate of existence, and of the owners with an interest equal to or higher than 5% of the capital or of the voting rights of the legal person, and/or that benefit in five per cent (5%) or more from the yields, profits or assets of the legal person, as of the SAGRILIFT requirements.

The support of the assessment support in restrictive, binding and informative lists must be duly documented under the custody of the area in charge of the counterparty association. In the event a warning sign is detected in the verification of restrictive and binding lists, it must be escalated to the Compliance Management through the e-mail *oficial_cumplimiento@avaldigitallabs.com* and/or the tool defined for the management of cases, to perform the applicable analysis.

The Main or Alternate Compliance Officer must take the reasonable measures for the Simplified or Intensified Due Diligence process, as applicable, in which it shall have a minimum of 3 workdays for the preparation of the report and the making of decisions based on the identified LAFTFPADM risks, likewise, it must notify the applicant by issuing the concept on whether it may continue or not with the process of association and/or updating of the counterparty. In the event that the reported Warning Sign is not fully documented, the Compliance Officer or its Alternate may request the enhancement of the necessary information, as applicable.

7.2. MASSIVE CONSULTATION IN RESTRICTIVE, BINDING AND INFORMATIVE LISTS

Massive verifications and consultations in restrictive, binding and informative lists must be performed as a monitoring and tracking measure through the tool designated by the Companies, as of the established periodicity determined by the Main or Alternate Compliance Officer. As an input, the owner of the process of association and updating of customers, suppliers, collaborators and/or third parties and intermediaries must provide the Risks Unit (SAGRILIFT) with the databases that contain the Counterparty’s information, may it be a third natural person to be associated (name and type of document, identification document and domicile) Collaborator (name, identification document, domicile, position and the management it belongs to) or legal, the identification, domicile, Final Beneficiary, the name of the legal representative, the name of the person of contact, the position it performs in, date of the Counterparty’s knowledge or monitoring process, in order to determine potential warning signs of persons and entities



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linked to risks associated with the LA/FT/FPADM. In the event of having found a coincidence, the Main or Alternate Compliance Officer evaluates the risk level and takes the necessary measures for its treatment and mitigation.

7.3. PROCESS OF SIMPLIFIED DUE DILIGENCE

The Due Diligence must be performed prior to the counterparty association and in a continuous way as a monitoring, during the contractual relationship, with the periodicity and regularity set by the Risk Unit SAGRILIFT, at least once every two (2) years or anytime it is necessary as of the changes of the counterparty judiciary and reputational conditions.

The Companies adopt the following minimum measures for the simplified due diligence process of the counterparties, with an approach based on a low risk and the materiality thereof:

- To identify the counterparty and to verify its identity using reliable documents, data or information, from independent sources.
- To identify the Counterparty Final Beneficiary and to take measures to verify its identity.
- Regarding legal persons, measures must be taken to know the structure of the Legal Persons’ property, in order to obtain the name and the identification number of Final Beneficiaries, the taken measures must be consistent with the risk level and its materiality induced by the ownership structure or the nature of the majority associates.
- To understand and, where applicable, obtain additional information on the purpose and nature intended for the commercial relationship.
- To perform a continuous due diligence of the commercial relationship and to examine the transactions carried out over the course of that relationship, to ensure that the performed transactions are consistent with the knowledge it has of its counterparty, its commercial activity and the risk profile, including, where necessary, the source of funds.

For the proper knowledge of the counterparties, the ones in charge of the association and updating of the counterparties must check the fields are properly processed (as applicable) in the registration or updating form designed by the Companies for each of their counterparties.

The forms, the furnished information and the performed consultations must be filed as a support, in a digital means in the counterparty folder and guarded by the area in charge of the association and/or updating.



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For the operations analysis, the Risk Unit (SAGRILIFT) consolidates databases that allow it to perform a Simplified Due Diligence, considering the risk factors associated with LAFTFPADM.

These databases contain information of the Counterparty, may it be a third natural party to be associated (name, identification document and domicile) or legal, identification, domicile, Final Beneficiary, the name of the legal representative, the name of the person of contact, the position it performs in, date of the knowledge or monitoring process of the Counterparty.

The Companies, prior to the commencement of the contractual relationship, must have met the Due Diligence procedures, attaching for such effect the required supports, and having been endorsed by the officer or the person in charge of the process. If the Companies cannot satisfactorily carry out the Due Diligence, it must evaluate the relevance of starting or ending the legal or contractual relationship, as well as the relevance of reporting the operation as suspicious.

7.4. PROCESS OF INTENSIFIED DUE DILIGENCE

For the cases that require an advanced knowledge of the counterparty or of the origin of its operations that make up its incomes and assets, the Companies shall carry out the Intensified Due Diligence Process, which includes activities additional to those carried out in the Simplified Due Diligence.

These proceedings must apply to those Counterparties that:

- The Companies consider to represent a greater risk.
- To the counterparties or when its Final Beneficiary holds the capacity of politically exposed persons PEPs;
- To those located in non-cooperating countries and high risk jurisdictions.

Once these counterparties are identified, the Companies, as a part of the Intensified Due Diligence, shall:

- Obtain the approval of the instance or employee of higher level for the association, or to continue with the contractual relationship, as applicable.
- Adopt measures to establish the origin of resources.
- Perform a continuous and intensified monitoring of the contractual relationship.
- Permanently check that the counterparties are not established or domiciled in the countries of greater risk contained in the GAFI lists of non-cooperative countries and high risk jurisdictions.

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7.5. ASSOCIATION OF CUSTOMERS

The knowledge of customers must be made before commencing any commercial relationship or under the provided exceptions, for that, the Companies have forms of application for associations for natural and legal persons, designed as of their own needs, and must contain as a minimum the requirements demanded by the regulations in force.

According to the above, the natural and/or legal persons must pursue the compliance of all the documents and association forms, since these documents and forms consolidate the identity, commercial information, funds origin statements and data treatment policies, among others. Such documents must be signed by the legal representative of the third party, and any exception must be authorized by the Compliance Officer, to document and guarantee the due diligence effects.

Once the documents and forms are received, it shall be proceeded with the revision and consultation in internal and external information sources, to guarantee the knowledge process of third parties through data collection.

In the event that the Customer, its Final Beneficiaries, Legal Representative or associates with an interest percentage higher than 5% are included in one of the Lists or may generate a contagion risk, the Main or Alternate Compliance Officer shall perform an analysis considering the criteria that may determine the risk level of such coincidence in lists and, for the applicable cases, the association process shall be suspended. If the finding takes place on a List that does not represent a direct risk of Contagion, it shall be proceeded with the Intensified Due Diligence process.

7.6. ASSOCIATION OF SUPPLIERS

The knowledge of suppliers must be performed before starting any commercial relationship or, as of exceptions for their initial association, within the framework of the interaction for the acquisition of goods and services or in the process of information updating, for that, the Companies have forms of application for the association of natural and legal suppliers, designed as of their own needs, and must contain as a minimum the requirements demanded by the regulations in force.

The Supplier’s information must be updated at least once a year, provided that the Supplier or Contractor is active in the Companies. According to the above, natural and/or legal persons must pursue to comply with the totality of the association documents and forms.

These documents and forms consolidate the identity, commercial information, funds origin statements and data treatment policies, among others. Such documents must be signed by the legal representative of the third party, and any exception must be authorized by the Compliance Officer, to document and guarantee the due diligence effects.



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Once the signed form and the attached documents are received, it shall be proceeded with the revision and consultation in internal and external information sources to guarantee the knowledge process of third parties through the data collection thereof.

Foreign suppliers, as of their nature, country and regulatory regime where they develop, must process document w-9 or its equivalent (form that contains their basic data for the counterparty’s knowledge), without conditioning the filing of physical documents.

In the event that the Supplier, its Final Beneficiaries, Legal Representative or associates with an interest percentage higher than 5% are included in one of the Lists or may generate a contagion risk, the Risk Area led by the Main or Alternate Compliance Officer shall perform an analysis considering the criteria that may determine the risk level of such coincidence in lists and, for the applicable cases, the association process shall be suspended. If the finding takes place on a List that does not represent a direct risk of Contagion, it shall be proceeded with the Intensified Due Diligence process.

7.7. ASSOCIATION PROCESS OF POLITICALLY EXPOSED PERSONS (PEP’s)

Considered as Politically Exposed Persons (PEP’S) are those national or foreign people that because of their profile or for the functions they perform may expose the Companies in a greater degree to the risk of the LA/FT/FPADM.

Their identification begins at the association form and the corresponding evidence and record must be filed; the knowledge process must include an Intensified Due Diligence. Any negotiation performed with PEPs must be approved by the Main or Alternate Compliance Officer, in accordance with the policies and criteria approved by the Board of Directors.

In the event that the information supplied by the PEPs cannot be confirmed, is inaccurate, false or allegedly false, this event must be immediately reported to the Compliance Officer to adopt the applicable measures.

7.8. ASSOCIATION OF NON-PROFIT ENTITIES

The non-profit entities, or ESAL for its acronym in Spanish, are legal persons, that may enforce rights and enter into obligations. They do not pursue a profit, that is, they do not intend to distribute the surplus or profits generated within the development of their social objectives, but they pursue to enhance their own equity, for the fulfillment of their goals and objectives which, in general, are of social benefit.

Counterparties established as non-profit entities must inform their condition in the evaluation and/or updating process through the association form and to provide the following documents:



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- Certificate of existence and legal representation, where the administrators, representatives and council members appear (if applicable).
- Certification signed by the legal representative that states the composition of the administrators or controllers, that holds a greater authority in relation with the management for direction functions of the legal person (Assembly, Board of Directors, or others), that includes identification type and number, full names and position.

8. GENERATION AND REPORT OF WARNING SIGNS

Warning signs are facts, situations, events, amounts, financial reasons and other information that is determined as relevant, from which it may timely and/or prospectively infer the potential existence of an event or situation that escapes from what the entity defines within the SAGRILIFT development. Any collaborator of ADL Digital Lab or of its companies may make the LA/FT/FPADM Risk warning signs report through the communication channels provided for such purpose.

9. REPORTS

9.1. REPORT OF UNUSUAL OPERATIONS

Each collaborator must be in the capacity of identifying an unusual operation and it is its responsibility to report it to the Compliance Officer immediately, stating the operation and indicating the reasons why it was determined as unusual, to e-mail oficial_cumplimiento@avaldigitallabs.com or to the Compliance Management.

9.2. REPORT OF SUSPICIOUS OPERATIONS (ROS).

The Compliance Manager must guarantee the reserve of the report of a Suspicious Operation to the UIAF, as set forth in Act 526 of 1999 and other standards, that add to, modify or supersede it. Once an Unusual Operation or a Suspicious Operation are identified and analyzed, the supports that gave rise to label it in one category or another must be kept, and all the Suspicious Operations detected in the ordinary course of its business or activities must be reported to the UIAF. The report must be made immediately and with a ROS nature, through the SIREL.

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9.3. LACK OF REPORT OF SUSPICIOUS OPERATIONS – AROS

In the event a quarter passes without ADL Digital Lab or its Companies performing a ROS; the Compliance Officer, within the ten (10) calendar days following the expiration of the respective quarter, must present a report of lack of suspicious operation reports (AROS) to the UIAF through the SIREL, in the corresponding form and terms, as of the users’ manual of that platform.

9.4. PERIODIC REPORTS OF INFORMATION TO THE SUPERINTENDENCE OF SOCIETIES

The responsibility for the processing, content and accuracy of the periodic informative reports falls on the administrators and the Compliance Officer of the company, this is why reports must be made within the deadlines and under the parameters set by Supersociedades.

10. CONSEQUENCES OF A BREACH

Notwithstanding the civil and criminal remedies that may apply as of the regulations in force and the laws related to the LA/FT/FPADM Risk, the failure to comply this Manual may submit the collaborators, who act on behalf of the Companies and that are involved in such breaches, to penalties, prison sentences, civil claims for compensation, dismissal and other disciplinary actions.

Likewise, any counterparty that breaches the guidelines stipulated in this document constitutes a breach of the obligations and implies sanctioning consequences, defined in the contractual and legal terms in force.

11. TYPE OF INFORMATION

Public	Internal	Confidential
	X	

15. ENFORCEABILITY

Companies	Transversal
	X



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16. CHANGES CONTROL

Version	Approval Date	Description
01	01/12/2024	Initial Version
02	07/15/2025	General update of the Manuals