**COSMOAGRO S.A. SAGRILAFT MANUAL**

# Manual for the Comprehensive Self-Monitoring and Risk Management System for Money Laundering, Terrorist Financing and Proliferation Financing of Weapons of Mass Destruction – SAGRILAFT implemented and approved for TRIADA EMA S.A. SUC. COLOMBIA

## GENERAL INDEX – Sections


1. **INTRODUCTION** ........ 3
2. **PURPOSE OF THE MANUAL** ........ 3
3. **SCOPE OF THE MANUAL** ........ 3
4. **LEGAL AND REGULATORY FRAMEWORK** ........ 4
5. **SCOPE OF APPLICATION** ........ 4
6. **DEFINITIONS** ........ 5
7. **FUNCTIONS AND RESPONSIBILITIES TOWARDS SAGRILAFT** ........ 8
   - 7.1. **FUNCTIONS OF THE BOARD OF DIRECTORS** ........ 8
   - 7.2. **FUNCTIONS OF THE LEGAL REPRESENTATIVE** ........ 8
   - 7.3. **QUALIFICATIONS AND DUTIES OF THE COMPLIANCE OFFICER** ........ 9
   - 7.4. **DUTIES OF THE FISCAL AUDITOR** ........ 11
8. **RISK FACTORS** ........ 12
9. **STAGES OF THE SAGRILAFT** ........ 12
   - 9.1. **IDENTIFICATION OF ML/TF/FPWMD RISK – METHODOLOGY** ........ 12
   - 9.2. **MEASUREMENT OR ASSESSMENT OF ML/TF/FPWMD RISK** ........ 13
   - 9.3. **ML/TF/FPWMD RISK CONTROL** ........ 15
   - 9.4. **ML/TF/FPWMD RISK MONITORING** ........ 18
10. **SAGRILAFT POLICIES** ........ 18
   - 10.1. **General ML/TF/FPWMD Policy** ........ 18
   - 10.2. **Conflict of Interest Policy** ........ 19
   - 10.3. **Cash Handling and Payments Policy** ........ 20
   - 10.4. **Virtual Assets Transaction Policy** ........ 20

**10.5. New Market Entry Policy** .......... 20
**10.6. Risk Factor Management Policy** .......... 20
**10.7. Counterparty Due Diligence Policy** .......... 20
**10.8. Suspicious Transaction Reporting Policy** .......... 21
**10.9. Document Retention and Handling Policy** .......... 21
**10.10. Disclosure and Training Policy** .......... 21
**10.11. Confidentiality Policy Regarding Authority Information Requests** .......... 21
**10.12. Policy on Non-Compliance with SAGRILAFT** .......... 22
**11. DUE DILIGENCE PROCEDURES** .......... 22
**11.1. Due Diligence for Suppliers and Contractors** .......... 22
**11.2. Customer Due Diligence (CDD)** .......... 23
**11.3. Employee Due Diligence** .......... 24
**11.4. Shareholder Due Diligence** .......... 25
**12. ENHANCED DUE DILIGENCE (EDD)** .......... 25
**13. DETECTION AND ANALYSIS OF UNUSUAL TRANSACTIONS & DETERMINATION OF SUSPICIOUS TRANSACTIONS** .......... 26
**13.1. Detection and Analysis of Unusual Transactions** .......... 26
**13.2. Red Flags** .......... 27
**13.3. Internal Reporting of Red Flags and Unusual Transactions** .......... 28
**13.4. Analysis of Red Flags and Unusual Transactions** .......... 28
**13.5. Determination of Suspicious Transactions** .......... 29
**13.6. Suspicious Transaction Report** .......... 29
**13.7. Documentation and Filing of Analyzed Cases** .......... 29
**13.8. Other External Reports** .......... 30
**14. DISCLOSURE AND TRAINING** .......... 30
**15. RESPONSE TO AUTHORITY REQUESTS** .......... 31
**16. IMPOSITION OF SANCTIONS** .......... 31
**17. CHANGES, UPDATES, AND PUBLICITY DISCLOSURE** .......... 31
**18. CERTIFICATE OF APPROVAL AND IMPLEMENTATION** .......... 32

## 1. INTRODUCTION

COSMOAGRO S.A. (hereinafter "COSMOAGRO" or the "Company"), as a company in the agro-industrial sector, understands and identifies with the concerns raised by both national and international authorities and organizations regarding the scourge of Money Laundering ("ML"), Terrorist Financing ("TF"), and the Financing of the Proliferation of Weapons of Mass Destruction ("FPWMD"), which are criminal activities currently present and on the rise in our country.

As part of the commitment of COSMOAGRO, its shareholders, and its administrators to Colombian society, and in compliance with the regulatory obligation led by the Superintendency of Companies to implement a Self-Control and Comprehensive Risk Management System for ML/TF/FPWMD (hereinafter, "SAGRILAFT"), the Company has adopted this SAGRILAFT Manual (hereinafter, the "Manual"). The purpose of this Manual is to ensure that COSMOAGRO adopts the appropriate procedures to identify, assess, and control or mitigate its ML/TF/FPWMD risks, preventing its lawful commercial activity from being used to carry out these prohibited or unlawful acts.

COSMOAGRO understands that the most effective way to contribute to the fight against ML/TF/FPWMD and comply with its regulatory obligations is to define clear, objective rules, processes, and procedures. Accordingly, COSMOAGRO seeks to build an efficient and effective SAGRILAFT to manage its ML/TF/FPWMD risks, as embodied in this Manual.

## 2. PURPOSE OF THE MANUAL

Through this instrument, COSMOAGRO establishes an active consultation and procedural tool to be used throughout its various commercial operations that may be affected by ML/TF/FPWMD risks. It enables the Company's Administrators and Compliance Officer to review the policies and procedures to be followed in order to prevent or control ML/TF/FPWMD risk within COSMOAGRO's operations. In this way, the Company protects both its lawful ability to operate in the market and its most valuable intangibles—its reputation, goodwill, and trademarks.

This Manual aims to define the behavioral rules COSMOAGRO expects from its employees, contractors, suppliers, clients, shareholders, and related third parties, as part of its overall commitment to legality. Thus, the Manual serves as a presentation to its clients, suppliers, business partners, and any interested parties who wish to understand how COSMOAGRO addresses the issues and risks related to ML/TF/FPWMD, as part of its corporate culture.

## 3. SCOPE OF THE MANUAL

COSMOAGRO seeks to foster a genuine culture of prevention, compliance, and legality within the organization and its sphere of influence. This is backed by efficient and effective controls over the ML/TF/FPWMD risks to which it may be exposed in the course of its commercial and productive operations. COSMOAGRO's SAGRILAFT consists of a series of procedures and policies that define the stages, elements, and appropriate tools for managing ML/TF/FPWMD risk.

## 4. LEGAL AND REGULATORY FRAMEWORK

a) **Chapter X of the Basic Legal Circular issued by the Superintendency of Companies**: This regulation mandates that supervised companies must design and implement a SAGRILAFT when meeting the criteria for economic activity and total income established by the Circular. Specifically, it applies to real sector companies that, as of December 31 of the previous year, had total revenues equal to or greater than **40,000 legal monthly minimum wages (SMLMV)**.

b) **External Circulars 100-000016 of December 24, 2020, and 100-000004 of April 9, 2021**, which comprehensively modified Chapter X of the Basic Legal Circular, and any future administrative acts that modify it.

c) **Law 599 of 2000 – Colombian Criminal Code**: Establishes and classifies crimes in Colombia, including those related to ML/TF/FPWMD under Article 323, and Article 441, which obliges any natural person to report the commission of ML/TF/FPWMD crimes when known.

d) **Law 1121 of 2006**: Establishes rules for the prevention, detection, investigation, and punishment of terrorist financing. It imposes the duty to report, immediately and sufficiently, to the Financial Information and Analysis Unit (UIAF) and the Attorney General's Office, when identifying any person listed on international sanctions lists binding on Colombia.

e) **Law 1708 of 2014 – Asset Forfeiture Code**: Article 119 outlines the obligation to report illicit assets that may be subject to forfeiture, and Article 120 establishes a 5% reward for the whistleblower.

f) **Decree 1068 of 2015**: The Unified Regulatory Decree of the Finance and Public Credit sector, which mandates that entities outside of the financial and insurance sectors report suspicious transactions to the UIAF when required.

g) **Decree 1736 of 2020**: Grants the Superintendency of Companies the authority to instruct supervised entities on measures to promote transparency and corporate ethics, including the implementation of mechanisms to prevent ML/TF/FPWMD.

h) **External Circular No. 100-000008 of June 11, 2021 – Superintendency of Companies**: Contains the Supervision Policy of the SAGRILAFT Regime.

## 5. SCOPE OF APPLICATION

This Manual is intended for the Administrators, employees, shareholders, members of the Board of Directors, suppliers, contractors, clients, and any other third parties that have a legal or contractual relationship with COSMOAGRO. Accordingly, COSMOAGRO shall make its best efforts to structure the appropriate contractual instruments to ensure compliance with this Manual by its recipients or counterparties.

## 6. DEFINITIONS

Without prejudice to other terms defined throughout this Manual, the following glossary applies to this document. The definitions below shall be interpreted equally whether the term is used in the singular or plural form.

a) **Shareholder**: A natural or legal person who holds shares of COSMOAGRO S.A., duly registered in the Shareholders' Registry Book.

b) **Virtual Asset (VA)**: A digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes. In practice, virtual assets create opportunities for ML/TF. Virtual assets do not include digital representations of currency, securities, or other financial assets already covered under other sections of the Financial Action Task Force (FATF) Recommendations.

c) **Administrator(s)**: Refers to the legal representative (principal or alternate), liquidator, member(s) of the Board of Directors or the General Shareholders' Assembly, or any person who, in accordance with COSMOAGRO's bylaws, performs or holds these functions legally and statutorily.

d) **Counterparty**: Refers to any natural or legal person with whom COSMOAGRO maintains civil, commercial, business, contractual, or legal relations of any kind. Examples include Shareholders, Administrators, Employees, Suppliers, Contractors, and Clients of COSMOAGRO.

e) **Customer**: A natural or legal person with whom COSMOAGRO establishes and maintains a contractual, legal, or business relationship for the sale or provision of any product or service from the COSMOAGRO S.A. portfolio.

f) **Contractor**: A natural or legal person with whom COSMOAGRO establishes and maintains a contractual or legal relationship for the acquisition of goods or services.

g) **ML/TF/FPWMD Risk Control**: The implementation of procedures or policies aimed at preventing, reducing, or neutralizing operational ML/TF/FPWMD risk.

h) **Due Diligence**: The set of processes carried out by COSMOAGRO on its Counterparties to prevent ML/TF/FPWMD risks during interactions. This process shall consider the 40 recommendations of the Financial Action Task Force (FATF).

i) **Event**: A situation of ML/TF/FPWMD risk that occurs or may occur.

j) **Operational Risk Factors**: Sources of ML/TF/FPWMD risk generation for the Company during its operations, from which Events are identified within the framework of COSMOAGRO's policies.

k) **Terrorist Financing (TF)**: A criminal offense committed by any person engaging in conduct described in Article 345 of the Criminal Code.

l) **Financing of the Proliferation of Weapons of Mass Destruction (FPWMD)**: Any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, handling of materials, processing, transport, transfer, deposit, or dual-use for illegitimate purposes in violation of applicable national or international laws.

m) **Money Laundering (ML)**: The process by which criminal organizations attempt to give a legal appearance to resources derived from illicit activities. In practical terms, it is the process of making "dirty money" appear "clean," enabling criminals or criminal organizations to use such funds and, in some cases, profit from them. It is a criminal offense committed by anyone seeking to give a lawful appearance to assets or money originating from any of the activities described in Article 323 of the Criminal Code.

n) **Restrictive Lists**: These are national and international risk lists that gather information, reports, and background on various entities, including individuals and legal entities, that may be linked to suspicious activities, investigations, proceedings, or convictions related to ML/TF/FPWMD. Examples include CLINTON List, OFAC, UN, EU, DEA, INTERPOL, among others.

o) **Compliance Officer**: The individual appointed by COSMOAGRO to oversee compliance with this SAGRILAFT Manual, and to promote, develop, and monitor the execution of specific procedures for the prevention, updating, and mitigation of ML/TF/FPWMD risks. The Compliance Officer is appointed by the Board of Directors and must meet the profile and qualifications established by the Superintendency of Companies in External Circular 100-000016 of 2020, which modified Chapter X of the 2017 Basic Legal Circular.

p) **Unusual Operation**: A transaction whose amount or characteristics are inconsistent with the client's economic activity, or which, due to its size, frequency, or particular features, falls outside the established parameters of normality.

q) **Suspicious Operation**: A transaction that, due to its number, amount, or characteristics, does not align with the usual systems and practices of a specific industry or sector and cannot be reasonably justified based on common business customs. These operations must be reported exclusively to the UIAF.

r) **Politically Exposed Person (PEP)**: Public officials at the national, departmental, or municipal levels, who hold positions of direct responsibility or have been delegated such roles for the formulation of institutional policies and the adoption of plans, programs, and projects, or the management of state assets. This applies to all branches of government: Legislative, Executive, and Judicial. *Note: COSMOAGRO uses a third-party service to verify individuals against restrictive lists.*

s) **Suppliers or Contractors**: All natural or legal persons who provide goods and/or services necessary for the execution of the Company's activities.

t) **Internal Reports**: Reports made within the Company by any employee who becomes aware of a possible Unusual or Suspicious Operation. Internal Reports also include those submitted at least once per year by the Compliance Officer to COSMOAGRO's Board of Directors.

u) **ML/TF/FPWMD Risk**: The possibility of loss or damage that the Company may suffer by being used as an instrument for ML/TF/FPWMD. This risk is expressed in terms of probability (likelihood or frequency of occurrence) and impact (consequences if it materializes).

v) **Risks Associated with ML/TF/FPWMD**: Refer to the consequences and effects for the Company resulting from the materialization of ML/TF/FPWMD risk. These may include:

- **Legal Risk**: The potential for loss or damage affecting the Company, its Shareholders, its Administrators, or other related persons, due to sanctions, fines, or liability for damages stemming from violations of laws or regulations related to ML/TF/FPWMD prevention.
- **Reputational Risk**: The potential for loss or damage caused by public disgrace, negative publicity, or loss of goodwill regarding the Company or its business practices, leading to a loss of investment opportunities or reduced income.
- **Operational Risk**: The potential for the Company to be used in ML/TF/FPWMD activities due to deficiencies, failures, or errors in human resources, processes, technology, infrastructure, or due to external events.
- **Contagion Risk**: The potential for loss that the Company may suffer, directly or indirectly, from the actions or reputations of Shareholders, clients, employees, suppliers, contractors, or related parties connected to ML/TF/FPWMD offenses. Related parties include individuals or legal entities that may exercise influence over the Company or its commercial operations.
- **Inherent Risk**: The risk level or profile intrinsic to the Company's activities, before taking into account the implementation of ML/TF/FPWMD risk controls.
- **Residual Risk**: The remaining level or profile of risk for the Company after the implementation of ML/TF/FPWMD controls.

w) **Red Flags**: Specific circumstances that deviate from established norms and trigger attention and further analysis due to the potential presence of an unusual or suspicious operation. Such cases must be reported.

x) **System or SAGRILAFT**: Refers to the Self-Control and Risk Management System for ML/TF/FPWMD adopted by COSMOAGRO S.A., which must be applied in all its commercial operations and dealings with counterparties.

y) **Terrorism**: Defined as any act intended to cause terror among the civilian population through actions that endanger life, integrity, or freedom using instruments capable of causing destruction. Such instruments may originate from both legitimate and illegitimate sources. (See Article 343 of the Criminal Code)

z) **UIAF**: The Financial Information and Analysis Unit (Unidad de Información y Análisis Financiero) is the technical investigation office attached to the Ministry of Finance. It serves as the State's financial intelligence unit, created to prevent, detect, and combat Money Laundering and Terrorist Financing.

## 7. FUNCTIONS AND RESPONSIBILITIES TOWARDS SAGRILAFT

Without prejudice to the other internal duties assigned within COSMOAGRO to the various individuals and bodies described below, the following functions are established for the implementation and application of the System.

### 7.1. FUNCTIONS OF THE BOARD OF DIRECTORS

In addition to the statutory duties assigned to the Board of Directors, this body must specifically perform the following responsibilities in relation to the SAGRILAFT:

a) Define and approve the Company's ML/TF/FPWMD Policy.

b) Review and approve the SAGRILAFT Manual and other documents of the System submitted by the Legal Representative and the Compliance Officer, including any updates.

c) Appoint the Compliance Officer and verify that they have the availability, experience, and qualifications necessary to carry out their duties.

d) Provide the operational, financial, physical, technological, and other resources required by the Compliance Officer to carry out their functions.

e) Receive, analyze, and provide timely feedback on the reports submitted by the Compliance Officer, and when necessary, define improvement proposals for the System.

f) Monitor critical issues included in the reports presented by the Legal Representative, Compliance Officer, or Statutory Auditor regarding the Company's SAGRILAFT, and record such matters expressly in the corresponding meeting minutes.

g) The above must be formally recorded in the respective meeting minutes.

### 7.2. FUNCTIONS OF THE LEGAL REPRESENTATIVE

In addition to the statutory duties of the Legal Representative established in corporate bylaws, Board of Directors' instructions, and applicable legal regulations, the Legal Representative shall also fulfill the following specific duties regarding the SAGRILAFT:

a) Jointly present to the Board of Directors, along with the Compliance Officer, the SAGRILAFT Manual and other related documents of the System.

b) Efficiently allocate the operational, financial, physical, and technological resources necessary for the Compliance Officer to implement the System and carry out monitoring and compliance tasks.

c) Verify that the Compliance Officer has the availability and capacity required to perform their functions.

d) Provide effective, efficient, and timely support to the Compliance Officer in the design, management, supervision, and monitoring of the SAGRILAFT.

e) Monitor critical issues raised in the reports submitted by the Compliance Officer or the Statutory Auditor concerning the Company's SAGRILAFT, with the obligation to report any matters deemed relevant to the Board of Directors.

f) Ensure that all SAGRILAFT-related activities are properly documented.

g) Certify to the Superintendency of Companies, when required by such authority, that the provisions regarding the SAGRILAFT and approved policies are being fulfilled.

### 7.3. QUALIFICATIONS AND DUTIES OF THE COMPLIANCE OFFICER

The Company's Board of Directors shall appoint a natural person to serve as the principal and alternate Compliance Officer, who must meet at least the following qualifications:

a) Hold a professional degree.

b) Demonstrate knowledge and at least six (6) months of experience in roles related to the management of ML/TF/FPWMD Risk.

c) Be domiciled in Colombia.

The Compliance Officer shall have the following duties:

a) Oversee and direct the design of the System, taking into account the Company's specific characteristics, its business activities, and the identification of its Risk Factors.

b) Jointly present the SAGRILAFT Manual to the Board of Directors with the Legal Representative for review and approval, and ensure such approval is recorded in the respective meeting minutes.

c) Implement the Manual with the support of the Legal Representative and ensure that employees apply it effectively.

d) When required, assess with employees the ML/TF/FPWMD risk for current and new operations.

e) Ensure the effective, efficient, and timely functioning of the SAGRILAFT.

f) Promote the adoption of corrections and updates to the SAGRILAFT when circumstances require it, and at least once every two (2) years. To this end, the

Compliance Officer must present to the Board of Directors proposed corrections and updates with justifications.

g) Inform the Legal Representative of any known failures or omissions in ML/TF/FPWMD risk controls.

h) Submit at least once per year a report to the Board of Directors on SAGRILAFT compliance, including an evaluation and analysis of the System's efficiency and effectiveness, improvement proposals (if applicable), and evidence of the results of both the Compliance Officer's and Company's performance in relation to the System.

i) Develop an internal disclosure and training program when necessary, to ensure that Company employees are properly informed, up-to-date, and trained to identify and report Unusual and Suspicious Operations.

j) Receive internal reports of Unusual or Suspicious Operations from responsible parties within different areas of the Company and, when appropriate, report Suspicious Operations to the UIAF.

k) Register themselves and the Company with the SIREL platform managed by the UIAF and request login credentials to access the platform and comply with mandatory reporting requirements.

l) Submit reports of Suspicious Operations ("ROS") or reports of Absence of Suspicious Operations ("A-ROS") to the UIAF, as well as any other reports or filings required under applicable laws and regulations on ML/TF/FPWMD prevention and control in Colombia. To fulfill this duty, the Compliance Officer must inform the Legal Representative of the contents of the ROS prior to submission—provided there is no conflict of interest as defined in section 10.2 below.

m) Report to the UIAF and the Office of the Attorney General, via the electronic channels established by those authorities, any matches of individuals found on Binding Lists. For this, the Compliance Officer must notify the Legal Representative beforehand—provided there is no conflict of interest under section 10.2 below.

n) Report to the competent authority whenever, during supervisory activities, they become aware of the commission of crimes related to ML/TF/FPWMD.

o) Address and coordinate any requirements, requests, or proceedings from judicial or administrative authorities related to the prevention and control of ML/TF/FPWMD activities.

p) Certify compliance with Chapter X of the Basic Legal Circular before the Superintendency of Companies, when required by the authority.

q) Evaluate reports from the Statutory Auditor concerning the Company's SAGRILAFT and implement necessary corrective actions to ensure the proper functioning of the System.

r) Ensure proper archiving of supporting documentation (ROS and Internal Reports), as well as any information related to the management and prevention of ML/TF/FPWMD risks.

s) Receive and respond to inquiries from counterparties regarding the Company's System.

t) Verify compliance with the Company's Due Diligence and Enhanced Due Diligence procedures.

u) Design methodologies for classifying, identifying, measuring, and controlling ML/TF/FPWMD risk, which will be part of the SAGRILAFT.

v) Conduct assessments of the ML/TF/FPWMD risk to which the Company is exposed.

**INCOMPATIBILITIES**

A person who is disqualified or incompatible under applicable rules may not serve as Compliance Officer. Accordingly, the following grounds shall prevent a person from being appointed or remaining in office as Compliance Officer:

I. Being a member of the Company's management or corporate bodies, internal or external audit bodies (e.g., statutory auditor or an individual affiliated with the firm providing external audit services), or holding similar functions within the Company.

II. Being part of any operational process within the Company that is exposed to ML/TF/FPWMD Risk, which may lead to a conflict of interest in the performance of duties as Compliance Officer.

III. Serving as Compliance Officer for more than ten (10) entities or simultaneously acting as Compliance Officer for another company that competes with COSMOAGRO, unless all such companies belong to the same corporate group.

If any grounds for disqualification or incompatibility arise after appointment, the Compliance Officer must immediately notify the Legal Representative and the Board of Directors.

### 7.4. DUTIES OF THE FISCAL AUDITOR

In accordance with the mandatory functions established by Article 207 of the Colombian Commercial Code, the fiscal auditor must verify that the operations carried out on behalf of the Company comply with the law, bylaws, and resolutions of the shareholders' assembly, and must report any irregularities in the Company's operations and business activities. Accordingly, the statutory auditor of COSMOAGRO shall:

a) Report to the UIAF any Suspicious Transactions detected in the normal course of business, and report any suspected criminal offenses affecting economic or social order to the relevant authorities. These incidents must also be communicated to the Company's management and corporate bodies.

b) Verify compliance with applicable regulations governing self-control and risk management of ML/TF/FPWMD, this SAGRILAFT Manual, and the internal controls established by the Company to mitigate such risks.

c) Submit at least annual reports on the results of system reviews and any recommendations to correct deficiencies to the Board of Directors or the Shareholders' Assembly, with copies to the Legal Representative and the Compliance Officer.

## 8. RISK FACTORS

COSMOAGRO has identified the following Risk Factors in its operations, business activities, or contracts.

| Risk Factor | Description |
| --- | --- |
| **With Counterparties** | COSMOAGRO's employees, clients, suppliers, contractors, and other third parties who may act on behalf of or interact with COSMOAGRO in the course of its commercial activities. |
| **By Jurisdiction** | The geographic location in Colombia or abroad where the company's corporate purpose operations take place, and where a higher or lower level of ML/TF risk may be identified. |
| **By Product Type** | The goods and services that COSMOAGRO sells or purchases in the course of its business operations. |
| **By Distribution or Commercialization Channels** | The channels through which COSMOAGRO must offer and market its goods and services. |

## 9. STAGES OF THE SAGRILAFT

To ensure the proper development and implementation of its SAGRILAFT, the Company follows the following stages:

### 9.1. IDENTIFICATION OF ML/TF/FPWMD RISK – METHODOLOGY

COSMOAGRO is aware of the economic, reputational, and legal impact that could result from the materialization of ML/TF/FPWMD Risk, as well as the contagion risk it could face by engaging with counterparties involved or affected by such criminal activities.

To identify its Inherent Risk, COSMOAGRO considers any internal or external Risk Factor associated with its business or with entry into new markets. The Company evaluates the context of its commercial activity, the jurisdictions and regions in which it operates, and the counterparties it interacts with.

To identify Risk Factors, the Compliance Officer will apply the following model, which outlines a series of stages designed to help understand and address present risks according to the context under analysis.

This methodology is based on risk assessment using the experience drawn from the Company's various processes. Through the compilation of ideas and concepts, and using the judgment of selected personnel, a list of ML/TF/FPWMD Risk Events that could impact COSMOAGRO will be constructed. This process involves the participation of directors, leaders, or area heads from Sales, Marketing, Operations, Finance, Human Resources, Accounting, Accounts Receivable, and IT, under the coordination of the Compliance Officer.

This identification will be a continuous process, taking into account the ML/TF/FPWMD Risk Factors identified by COSMOAGRO, which are detailed in Section 8 above.

In addition to the experiential judgment mentioned earlier, this stage will also make use of typologies related to ML/TF/FPWMD as documented by the Financial Action Task Force of Latin America (GAFILAT), obtained through online consultation.

Each Event will be characterized by identifying the process in which it may occur, its cause, the associated Risk Source, and the Associated Risk.

The same procedure shall be followed whenever the Company enters new markets, in order to identify the ML/TF/FPWMD Risks specific to that new market.

### 9.2. MEASUREMENT OR ASSESSMENT OF ML/TF/FPWMD RISK

Initially, COSMOAGRO will assess its ML/TF/FPWMD risks without considering the existing internal controls, in order to determine its **Inherent Risk Profile**. The rating of Inherent Risk is derived from the weighting of probability and impact variables, calculated using both quantitative and qualitative estimations based on the Company's historical data and the analysis of employees responsible for ML/TF/FPWMD risk processes.

To accomplish this, in addition to the tools already in use by the Company, the following risk assessment tables will be applied to ensure a more complete measurement of risks:

#### a) Probability Assessment

Probability refers to the likelihood that a previously identified ML/TF/FPWMD Risk Event may occur. It can be measured using frequency-based criteria or by considering the presence of internal or external factors that may trigger the risk—even if the risk has not yet materialized.

PROBABILITY

| Score | Rating | Description |
|---|---|---|
| **5** | Very High | The situation occurs frequently and continuously. The materialization of the risk happens often or on a permanent basis. |

| Score | Rating | Description |
|---|---|---|
| **4** | High | The situation occurs frequently but not continuously. The materialization of the risk may occur several times within a given period. |
| **3** | Moderate | The situation occurs at a medium frequency. The risk may materialize occasionally. |
| **2** | Low | The situation occurs sporadically. The risk materialization is expected at a minimal level. |
| **1** | Very Low | The situation has never occurred or is unlikely to occur. However, the risk is conceivable. |

**b) Impact Assessment**

Impact refers to the consequences that the materialization of the risk may have for COSMOAGRO.

| Score | Rating | Description |
|---|---|---|
| **5** | Extreme | The materialization of the risk causes significant economic losses and may result in the complete suspension of the Company's operations. |
| **4** | Severe | The materialization of the risk causes considerable economic losses and may lead to the temporary suspension of several Company operations. |
| **3** | Moderate | The materialization of the risk causes economic losses and may lead to the temporary suspension of certain Company activities. |
| **2** | Minor | The materialization of the risk has an impact and may result in indirect economic losses, but it does not cause a suspension of Company activities. |
| **1** | Insignificant | The materialization of the risk does not significantly impact the Company's operations. |

These probability and impact criteria will be reviewed periodically to refine the Risk Matrix, adjusting it to COSMOAGRO's nature as a company in the agro-industrial sector, and to the characteristics of its processes and procedures, so that the matrix aligns with the identified ML/TF/FPWMD risks.

### c) Inherent Risk Assessment

COSMOAGRO establishes its Inherent Risk Profile by multiplying the probability score by the impact score.

| | |
|---|---|
| LOW | |
| MEDIUM | |
| HIGH | |
| EXTREME | |

## 9.3. ML/TF/FPWMD RISK CONTROL

The Company has defined the ML/TF/FPWMD Risk Control mechanisms outlined in Section 9 to prevent, manage, or mitigate its Inherent Risk. These controls are applied according to the results from the previous stages to establish the **Residual Risk Profile**.

The objective is to mitigate risk by taking the necessary measures to reduce the **probability of occurrence and/or the potential impact** to which COSMOAGRO may be exposed.

The Company applies the following types of controls, depending on:

**a) Nature of the Control**

- (i) **Manual**: Executed by the employee responsible for the affected process.
- (ii) **Mixed**: Executed by the employee, but involves an automated alert or execution system.
- (iii) **Automatic**: Fully executed by an automated alert and control system.

**b) Evidence of Execution**

- (i) **Evidenced**: Documented proof of application is recorded.
- (ii) **Non-Evidenced**: No documentation of the application is recorded.

**c) Application of the Control**

- (i) **Random**: Applied randomly in response to events.
- (ii) **Partial**: Applied in some cases when an event occurs.

(iii) **Total**: Always applied when the event occurs.

**d) Documentation of the Control**

(i) **Undocumented**: The procedure is not documented.

(ii) **Semi-Documented**: The procedure is partially documented or outdated.

(iii) **Documented**: The procedure is fully documented and up to date.

**e) Type of Control**

(i) **Preventive**: Applied before the risk materializes.

(ii) **Detective**: Alerts the Company to failures in preventive controls and allows immediate corrective action. Used to verify the effectiveness of preventive controls.

(iii) **Corrective**: Applied once the risk has materialized, allowing actions to minimize impact. Typically used when preventive and detective controls have failed and often operate in conjunction with detective controls.

The consolidated assessment of the aforementioned controls yields evaluations regarding the robustness of each control, determining its strength and the need for modification. To that end, the following scoring table will be used, assigning points to each control based on its characteristics. The total score will indicate the **percentage of effectiveness**.

| Type of control | Score |
|---|---|
| The control is properly documented | 15 |
| The control is semi-documented | 10 |
| The person responsible for applying it is fully identified | 5 |
| The control is automatic | 15 |
| Control is mixed | 10 |
| Control is manual | 5 |
| Control is preventive | 15 |
| Control is corrective | 10 |
| Control is detective | 5 |
| Control always applies | 20 |

| | |
|---|---|
| Control applies to some defined cases | 10 |
| Control is applied randomly | 5 |
| Application is documented (evidenced) | 5 |
| The control has proven to be effective in controlling the risk | 30 |

**f) Control Effectiveness:**

(i) **Highly effective**: Prevents or mitigates more than 80% of the risk.

(ii) **Effective**: Prevents or mitigates more than 65% of the risk.

(iii) **Moderately effective**: Prevents or mitigates more than 50% of the risk.

(iv) **Slightly effective**: Prevents or mitigates more than 25% of the risk.

(v) **Not effective**: Prevents or mitigates less than 25% of the risk.

The effectiveness of a control in response to a specific Event will determine the reduction of the **probability and/or impact** of the risk, and thereby the Company's **Residual Risk Profile** (see page 7).

Based on the Residual Risk Profile, the Company may define **action plans** for those risks that exceed its maximum tolerance level, that is, residual risks assessed as **medium or higher**. For this purpose, COSMOAGRO will consider the following lines of action.

| LEVEL | ACTION PLAN |
|---|---|
| LOW | Risks at this level are a minor threat to the Company and do not require additional measures or controls beyond those already in place. They must be monitored at least twice a year (every two years).<br>This level of residual risk can be accepted, mitigated, or transferred. |
| MEDIUM | Risks at this level affect the Company and must be addressed by the employee or affected area in the medium term, applying satisfactory measures to mitigate them. They must be monitored at least annually. This level of residual risk must be mitigated or resolved. |
| HIGH | Risks at this level represent a significant threat to the Company and must be addressed in the short term to ensure a reduction in their level or their causes must be avoided. Likewise, they must be monitored continuously, at least once every six months. This level of residual risk must be mitigated or avoided. This will involve activating alerts, reports, and taking appropriate measures. |

| | |
|---|---|
| EXTREME | Risks at this level represent a high threat to the Company and must be addressed immediately to ensure a reduction in their level or their causes must be avoided. Likewise, they must be monitored continuously, at least quarterly. This level of residual risk must be avoided.<br>This will involve activating alerts, reports, and taking appropriate measures. |

**NOTE**: Periodic adjustments to COSMOAGRO S.A.'s Risk Matrix shall not constitute a modification of the SAGRILAFT Manual, as such updates are part of the self-control dynamic and its ongoing application.

### 9.4. ML/TF/FPWMD RISK MONITORING

The Compliance Officer shall conduct ongoing monitoring of the SAGRILAFT System in order to evaluate the timeliness, effectiveness, and efficiency of the controls, ensuring they are comprehensive and cover all identified ML/TF/FPWMD Risk Events. This monitoring must be conducted at least **once a year**.

Company employees must continuously monitor their activities to ensure that ML/TF/FPWMD risk situations do not occur and that the applied controls operate in a timely, effective, and efficient manner. Any deviation must be reported to the Compliance Officer.

Monitoring shall be carried out by the Compliance Officer with the collaboration of process leaders. Its purpose is to implement and recommend necessary corrective measures and adjustments to ensure effective ML/TF/FPWMD risk management. After monitoring is completed, the Compliance Officer will assess the results and, together with the process leaders, propose improvements and treatments for any detected issues to the Legal Representative and the Board of Directors.

The statutory auditor shall also conduct periodic reviews to help detect and correct deficiencies in the SAGRILAFT, and the results of such reviews must be reported to the Board of Directors, the Legal Representative, and the Compliance Officer. Based on these findings, the Compliance Officer will conduct an evaluation and adopt the appropriate measures to address the reported deficiencies.

## 10. SAGRILAFT POLICIES

### 10.1. General ML/TF/FPWMD Policy

The Board of Directors and the Administrators of COSMOAGRO declare and affirm that the Company:

a) Prioritizes compliance with laws and regulations for the prevention of ML/TF/FPWMD over achieving commercial goals. The prevention, detection, and monitoring of ML/TF/FPWMD risk shall be applied to all of COSMOAGRO’s activities in the course of its corporate purpose, and will be managed under the premise of **“greater risk, greater control.”**

b) Has a duty and commitment to ensure compliance with applicable laws and regulations designed to prevent and detect ML/TF/FPWMD, with the aim of protecting COSMOAGRO's image and reputation.

c) Shall refrain from conducting any transaction and shall report it to the competent authorities when it can be reasonably determined that the funds involved are the proceeds of, or intended to finance or support, illicit activities.

d) States that its employees and other Counterparties are aware of, apply, and comply with the provisions of this Manual, under penalty of the corresponding sanctions outlined in **Section 16** below, as well as applicable criminal and administrative consequences.

e) When engaging in transactions involving the purchase or sale of capital investments, will identify the buyer or seller and their respective economic activity.

f) Will cooperate with competent authorities regarding the prevention and control of ML/TF/FPWMD, responding promptly to requests, providing all relevant information, and complying with legal requirements.

g) COSMOAGRO fully adheres to the **Supervisory Policy for the Self-Control and Comprehensive Risk Management System for ML/TF/FPWMD**, issued by the Superintendency of Companies and set forth in **External Circular No. 100-000008 of June 11, 2021**, which is considered an integral part of this Manual.

### 10.2. Conflict of Interest Policy

No business or transaction may be conducted that places the Company at ML/TF/FPWMD risk, nor will the omission of ML/TF/FPWMD risk control procedures and measures be authorized.

The following situations are considered conflicts of interest related to ML/TF/FPWMD:

a) **When consulting Restrictive or Watch Lists, analyzing Unusual Transactions, reviewing Suspicious Transactions, or filing Suspicious Transaction Reports (ROS):** If the consultation, analysis, review, or report is conducted by an employee involving their spouse or domestic partner, relatives up to the fourth degree of consanguinity, second of affinity, or first of civil kinship, or in cases where the person responsible has a direct or indirect personal interest in the outcome.

b) **When submitting reports to authorities:** If the decision to file an external report affects the person responsible either directly or indirectly, or involves operations carried out by their spouse, domestic partner, or relatives as described above.

In any of these events, the person with the conflict must report it directly to the Compliance Officer. If the person with the conflict is the Compliance Officer, they must recuse themselves immediately and delegate all related responsibilities to the Alternate Compliance Officer. If the conflict is identified by a third party, it must be reported to the Board of Directors, which will designate another person to handle the matter ad hoc.

### 10.3. Cash Handling and Payments Policy

All payments to or from counterparties must be made through authorized financial system channels and to the name of the obligor. These transactions must be properly legalized and invoiced through systems regulated by the DIAN, such as **electronic invoicing** or equivalent mechanisms.

### 10.4. Virtual Assets Transaction Policy

The Company shall not accept contributions or payments, nor make investments or offer services related to **Virtual Assets**.

### 10.5. New Market Entry Policy

Prior to entering new markets, the Company shall identify the ML/TF/FPWMD risk factors and events specific to the new market and define the necessary controls. This process will follow the procedure set forth in **Section 9** of this Manual.

### 10.6. Risk Factor Management Policy

In cases where the Residual Risk is classified as **High** or **Extreme**, COSMOAGRO will restrict the operation or transaction involved or potentially affected until the risk is mitigated through additional controls. The Company prioritizes ML/TF/FPWMD risk management over commercial or financial objectives.

### 10.7. Counterparty Due Diligence Policy

COSMOAGRO considers the appropriate and thorough knowledge of its counterparties—both at onboarding and throughout the relationship—as a primary mechanism for controlling and preventing ML/TF/FPWMD risks.

The Company will not engage in business with counterparties whose operations lack transparency regarding their activities or source of funds, or who refuse to provide the required information or documentation.

COSMOAGRO will verify and update the information provided by counterparties at least once a year, in order to detect any changes in their business activities or financial situation. The Company will use the most suitable (including digital) means to maintain accurate knowledge of each counterparty.

Certain counterparties may expose the Company to greater ML/TF/FPWMD risks. In the following situations, **Enhanced Due Diligence (EDD)** procedures will be applied:

a) **Jurisdiction-based risk**: For counterparties located in non-cooperative or high-risk jurisdictions. COSMOAGRO will refer to the FATF list of non-cooperative countries and the Basel Index. Jurisdictions with a general rating above 6.5 will be considered high risk.

b) **Politically Exposed Persons (PEPs)**: Due to the increased ML/TF/FPWMD risk, relationships with PEPs will require Enhanced Due Diligence and ongoing monitoring.

c) **Watchlist subjects**: COSMOAGRO will not establish contractual ties with any individual or entity listed in Restrictive Lists (e.g., CLINTON List, OFAC).

### 10.8. Suspicious Transaction Reporting Policy

The Company will report to the **UIAF** any transactions that, due to their amount, characteristics, or other factors, may qualify as **Suspicious Transactions**.

The Company is **not required** to have certainty that a criminal act has occurred, to identify a specific criminal offense, or to prove that the funds are related to illegal activities. Reporting a suspicious event is not an accusation but a formal notice, leaving the matter to the relevant oversight body.

### 10.9. Document Retention and Handling Policy

The Company shall retain all documents and records related to the System in accordance with Article 28 of Law 962 of 2005 – "Rationalization of Procedures" – or its subsequent amendments.

Records may be stored in paper or any technical medium that guarantees accurate reproduction, for a period of **ten (10) years** from the last recorded entry or document. Once this term has expired, the documents may be destroyed, provided that:

a) No request for their delivery has been made by a competent authority.

b) They are retained in a format that guarantees accurate reproduction and evidentiary value, as required by law.

Documents and supporting information submitted to the UIAF will remain under the **safekeeping of the Compliance Officer**, and counterparties shall not have access to such records under any circumstances. Information requested by the UIAF shall also remain confidential.

COSMOAGRO shall maintain a **special archive** in which all SAGRILAFT documents are stored, ensuring the **integrity, timeliness, reliability, and availability** of the information.

### 10.10. Disclosure and Training Policy

COSMOAGRO will foster an internal culture of ML/TF/FPWMD risk prevention through training sessions and other available means.

The Company will disseminate its ML/TF/FPWMD prevention and control policies and procedures through a **training program led by the Compliance Officer**. This program will be addressed to all employees.

The program will include training at the start of the employment relationship and, thereafter, at least once per year. A knowledge evaluation will follow each training session. These sessions may be conducted either **in-person or virtually**, depending on circumstances.

### 10.11. Confidentiality Policy Regarding Authority Information Requests

Company employees must maintain confidentiality regarding judicial requests and inspections by authorities, as well as any reports submitted to the **UIAF**.

### 10.12. Policy on Non-Compliance with SAGRILAFT

Non-compliance with this Manual will be assessed in accordance with COSMOAGRO's internal rules or contractual provisions governing its relationship with counterparties.

Any **serious breach** of the policies and/or procedures established in this Manual—whether intentional or due to negligence or carelessness by any COSMOAGRO employee or contractor—will be subject to sanctions in accordance with the signed contracts, **labor law**, the **Internal Work Regulations**, and the applicable **disciplinary action procedures**, without prejudice to potential **civil, administrative, or criminal liabilities** arising from such conduct.

## 11. DUE DILIGENCE PROCEDURES

One of the primary mechanisms for preventing and controlling ML/TF/FPWMD-related operations is the **thorough knowledge of counterparties**, from the moment the Company expresses genuine interest in establishing a relationship and throughout its duration.

### 11.1. Due Diligence for Suppliers and Contractors

The supplier and contractor onboarding process begins with the initial contact, whether during the acquisition of goods or services or during information updates.

The **Purchasing or Supplier Analyst** must request that suppliers and contractors complete the **Supplier Due Diligence Form** provided by COSMOAGRO, which includes submitting the following documentation:

| **Individual (Natural Person)** | **Legal Entity (Juridical Person)** |
|---|---|
| Legible copy of the national ID card or foreign ID. If not available, a copy of the passport's main page will be required. | Certificate of existence and legal representation issued no more than 30 days prior, by the Chamber of Commerce of their domicile, or an equivalent document in the case of a foreign legal entity. |
| | Shareholding composition. |
| Tax Identification Number (NIT) | Legible copy of the ID card or foreign ID of the Legal Representative, or an equivalent document in their country. |
| Additional identification documents that allow clear and precise individualization of the person. | Tax Identification Number (NIT). |
| Certificates of service to other companies. Proof of experience. | Certificates of service to other companies. Proof of experience. |
| Public Accountant's certification of income source. | Financial statements as of December 31 of the previous year. |

Once the form is completed and the required documents attached, the **Purchasing – Supplier Analyst** will review the submission and follow the procedure outlined below:

- (a) **Information Confirmation**
- (b) **Control List Screening**
- (c) **Final Validation by the Legal Department**

This entire procedure must be documented before approving and accepting the supplier or contractor. The supplier or contractor's information will be entered into COSMOAGRO's database along with all documents supporting the due diligence process.

The supplier or contractor's information must be updated **at least once a year**, as long as they remain active with the Company.

If the supplier, contractor, or their **Ultimate Beneficial Owners** appear on any **Risk List** that poses a contagion risk to COSMOAGRO, the onboarding process shall be suspended. If the match occurs on a **Control List** that does not represent a direct contagion risk, COSMOAGRO will proceed with the **Enhanced Due Diligence** process described in **Section 12** of this Manual.

### 11.2. Customer Due Diligence (CDD)

Before entering into any relationship with clients, COSMOAGRO must carry out a due diligence process. This process must also be repeated if there is suspicion of ML/TF/FPWMD-related activity, if the information provided by the client is suspected to be false, or if there are substantial changes in the client's circumstances (e.g., change of control or modification of legal representation).

The purpose of this due diligence procedure is to fully identify the clients and their **Ultimate Beneficial Owners**, gather information on their economic activity, and equip COSMOAGRO with objective criteria to make informed decisions—especially in cases where establishing a relationship could pose an ML/TF/FPWMD risk to the Company.

COSMOAGRO employees and/or their representatives are not authorized to initiate a relationship with any new client without first completing the due diligence process as described below.

Depending on whether the prospective client is a **natural person** or a **legal entity**, the responsible area (Marketing) must request the completion of the **Customer Due Diligence Form**, along with the following documentation:

| **Natural Person** | **Legal Entity** |
|---|---|
| Legible copy of national ID or foreign ID. Alternatively, a copy of the main page of the passport. | Certificate of existence and legal representation issued no more than 30 days prior by the Chamber of Commerce of the entity's domicile or by a competent authority, or equivalent document for foreign legal entities. |

| Natural Person | Legal Entity |
|---|---|
| Tax Identification Number (NIT)<br><br>Public Accountant certification regarding source of income. | Legible copy of the national or foreign ID of the Legal Representative. Alternatively, a copy of the main page of the passport. |
| Additional identification documents that clearly and precisely individualize the person.<br>--------------------------------------<br>Data Processing Authorization<br>--------------------------------------<br>Bank Reference<br>--------------------------------------<br>Authorization for inquiry with Credit Bureaus and Watchlists | Tax Identification Number (NIT)<br>------------------------------------------------------------------------<br>Shareholding Composition<br>------------------------------------------------------------------------<br>Data Processing Authorization<br>------------------------------------------------------------------------<br>Bank Reference<br>------------------------------------------------------------------------<br>Authorization for inquiry with Credit Bureaus and Watchlists |

Once the responsible area has collected this information, it will check the names of the referenced natural or legal persons against **Watch Lists**, recording the result, date, and time of the verification and validating the accuracy of the information provided.

If the information cannot be verified or additional data is required, a request must be made to the prospective client.

The full documentation of this process must be included in the client's file for future reference.

If the client, their beneficial owners, or partners appear on a watchlist that poses a **contagion risk** to COSMOAGRO, the onboarding process will be suspended. If the match is found on a list that does not represent a direct contagion risk, COSMOAGRO will proceed with the **Enhanced Due Diligence** process described in Section 12 of this Manual.

### 11.3. Employee Due Diligence

Natural persons applying for a position at COSMOAGRO must be fully identified and must adhere to the following due diligence procedure.

During the recruitment and onboarding process, the **Human Resources Department** will review each candidate's résumé and supporting documents.

Candidates must complete the **Employee Due Diligence Form** and attach a copy of their identification document.

HR will verify the candidate's qualifications according to the job profile, review professional, personal, and family references, and assess all additional information provided. Furthermore, to mitigate ML/TF/FPWMD risks, HR will check the candidate against **Watch Lists**.

If the candidate or a current employee appears on a Watch List that poses a contagion risk to COSMOAGRO, the hiring process will be suspended, or, in the case of existing employees, justified termination will be considered.

For existing employees, data and Watch List checks will be **updated at least once per year**.

If any red flags or unusual behavior are detected, it must be reported to the Compliance Officer for investigation. If a risk materializes, the responsible area will analyze the case and make decisions in accordance with the consequences outlined in **Section 16** of this Manual.

### 11.4. Shareholder Due Diligence

COSMOAGRO will keep shareholder information updated in accordance with its **Shareholder Register Book**.

Current shareholders will be required to **update their information annually**, and their names will be screened against Watch Lists.

For new shareholders, COSMOAGRO will request the same information and documentation required under the **Client Due Diligence** process described in **Section 11.1**, depending on whether the individual is a natural person or a legal entity.

The Compliance Officer will verify the data and request updates **at least once a year**. If any risk is identified, it will be brought to the attention of the **Board of Directors**, which will decide on the appropriate course of action and, if necessary, escalate the matter to the **General Shareholders' Assembly**.

All documentation provided by shareholders must be **properly filed**, ensuring it is easily accessible for future reference or for inspection by competent authorities. This same process applies to **members of the Board of Directors**.

## 12. ENHANCED DUE DILIGENCE (EDD)

The enhanced due diligence process entails a deeper understanding of the counterparty. This procedure must be applied when a counterparty is identified as part of the groups outlined in the due diligence policy described in **Section 10.7** of this Manual.

Accordingly, in cases where a counterparty must be verified through this enhanced process, the following procedure must be followed:

a) The due diligence documents must be submitted to the **Board of Directors (BoD)**.

b) The Board shall review the due diligence and determine whether or not to proceed with establishing the relationship.

c) The person in charge of the process must carry out the Board's decision. If the relationship is to proceed, the counterparty must provide a **certification**, signed by its

**legal representative and statutory auditor** or, in the case of an individual, by the person and a **Certified Public Accountant**, declaring that:

i. All their funds originate from lawful activities.
ii. The funds derived from the relationship with COSMOAGRO will also be used for lawful purposes.
iii. The counterparty has in place the legally required ML/TF/FPWMD risk prevention procedures—or, if not legally required, has appropriate internal procedures to prevent such risks.

d) The responsible party must update the counterparty's evaluation every **six (6) months**, rather than the standard annual review applied to other counterparties.

EDD procedures for **Politically Exposed Persons (PEPs)** will also extend to:

- (i) Spouses or permanent partners of the PEP.
- (ii) Relatives of the PEP up to the **second degree of consanguinity**, **second degree of affinity**, or **first civil degree**.
- (iii) Associates of a PEP, when the PEP is a shareholder or is associated with a legal entity and **owns directly or indirectly more than 5%** of that entity or **exercises control** over the legal entity, in accordance with **Article 261 of the Colombian Commercial Code**.

## 13. DETECTION AND ANALYSIS OF UNUSUAL TRANSACTIONS & DETERMINATION OF SUSPICIOUS TRANSACTIONS

### 13.1. Detection and Analysis of Unusual Transactions

The detection and analysis procedure refers to the series of activities carried out to identify unusual behaviors from counterparties. These activities are documented and analyzed. If determined to be **suspicious operations**, they must be **reported to the UIAF**.

The identification of red flags and unusual transactions is carried out by **COSMOAGRO employees** or the **Compliance Officer** during the course of their regular duties, particularly during the application of controls in the **counterparty due diligence processes**, and continuously throughout the contractual relationship.

Red flags and unusual or suspicious operations are identified using the following tools:

a) **Control, Watch, and Binding Lists**: These help identify potential links with individuals or assets associated with ML/TF/FPWMD crimes, as detailed in **Section 11** of this Manual.

b) **Monitoring Against Counterparty Profile**: This helps identify atypical behavior in comparison to each counterparty's known characteristics. It involves a comparative analysis of the counterparty's actions to detect anomalies, that is, **unusual transactions**.

### 13.2. Red Flags

Red flags are situations that indicate atypical behavior from counterparties and help to identify or detect conduct, activities, methods, or conditions that could conceal ML/TF/FPWMD operations.

It is important to clarify that labeling a transaction as "unusual" does not necessarily mean it is related to illicit activity. Each transaction, business, or contract must be individually analyzed to determine whether it is in fact unusual.

The following, among others, are examples of red flags that should raise concern among COSMOAGRO employees and must be reported to the Compliance Officer for evaluation:

**a) Related to commercial transactions or counterparties:**

i. Natural or legal persons who are not fully identified.

ii. Shareholders or employees with criminal records related to ML/TF/FPWMD.

iii. Shareholders or partners accepted or onboarded without verification of the source of contributed funds.

iv. Activities of the counterparty inconsistent with its business purpose or contract.

v. Submission of incorrect, inaccurate, or unverifiable information, or incomplete forms.

vi. Media reports involving the counterparty or related individuals in matters linked to ML/TF/FPWMD.

vii. Mentions of the counterparty or related parties in reports from national or foreign authorities related to ML/TF/FPWMD.

viii. Breaches of contract clauses, especially those related to ML/TF/FPWMD risk prevention.

ix. Detection of unexplained increases in assets or wealth.

x. Frequent structuring of financial operations.

xi. Requests for payments or transfers to third parties not listed as clients or suppliers.

**b) Related to operations, business, or contracts involving:**

i. Large volumes of cash with no apparent justification.

ii. Movable or immovable property with values significantly above or below market price.

iii. Donations lacking an apparent Beneficial Owner, with unknown origin, or domiciled in high-risk jurisdictions.

iv. Significant business transactions or contracts not documented in writing.

v. Operations with subcontractors not previously identified.

vi. Commercial transactions with individuals or entities included on Watchlists.

vii. Transactions with counterparties located in jurisdictions designated by the FATF as non-cooperative.

viii. Operations involving goods stemming from illegal activities (e.g., smuggling).

ix. Transactions involving goods not properly nationalized.

x. Transactions involving restricted-sale goods lacking required licenses or authorizations.

**c) Related to cash transactions involving or originating from:**

i. Countries with high levels of corruption and political instability.

ii. Unexplained cash deposits in personal or corporate accounts.

iii. Amounts, values, or currencies inconsistent with the economic capacity of the carrier.

iv. Concealed transportation of cash.

v. Transport costs disproportionately high compared to alternatives.

vi. Cash sales or invoicing patterns not typical of the sector.

vii. Significant increases in cash transactions from unidentifiable clients.

### 13.3. Internal Reporting of Red Flags and Unusual Transactions

Whenever a COSMOAGRO employee identifies a red flag or unusual transaction during the course of their duties, they must report it to the Compliance Officer to initiate analysis and investigation.

Reports must be submitted via email with all supporting documentation attached to the following addresses:
**PRIMARY:** rdaguirreabogado@hotmail.com
**ALTERNATE:** andres.osorio@triada-ema.com

### 13.4. Analysis of Red Flags and Unusual Transactions

The **Compliance Officer** is responsible for reviewing reports submitted by employees and conducting a joint analysis with the process leaders responsible for managing the respective counterparties.

Once the analysis is completed, based on the findings, the Compliance Officer may proceed with one of the following actions:

| | |
|---|---|
| The situation or transaction is **NOT unusual**. | The reason is documented in writing in the file, and the case is closed. |

| | |
|---|---|
| The situation or transaction **IS unusual**, but was properly justified. | The reason is documented in writing in the file, and the case is closed. |
| The situation or transaction **IS unusual** and it **was not possible** to find a reasonable justification. | It is escalated for analysis as a potential suspicious transaction. |
| It is **not possible to determine** whether the situation or transaction is unusual due to **insufficient information**. | The case file remains open. Additional information is requested to deepen the understanding of the red flag and the counterparty. Follow-up continues until a conclusion is reached. |

### 13.5. Determination of Suspicious Transactions

The Compliance Officer is responsible for analyzing unusual operations to:

- Confirm that sufficient investigation was conducted regarding the red flag and the counterparty's background.
- Request additional information if necessary.
- Determine whether the situation remains unexplained or unjustified, and whether it raises a suspicion warranting a **Suspicious Activity Report (SAR)** to the **UIAF**.

Suspicious Transactions are determined once the unusual operation has been reviewed against the counterparty's profile and expected behavior. If suspicion remains unresolved, the **Compliance Officer** will file the report with the **UIAF**.

### 13.6. Suspicious Transaction Report

According to the decision made in the previous step, the Compliance Officer must immediately—meaning from the moment the Company decides to classify the transaction as suspicious—submit the report through the UIAF's website, following the guidelines outlined in the "SIREL User Manual," which is published on the UIAF website.

As the Suspicious Transaction Report (ROS) does not constitute a criminal complaint, it does not need to be signed by any employee; it is submitted at the institutional level. The ROS shall not result in any liability for the Company or for the administrators or employees involved in its determination and submission.

The ROS does not exempt the Company from the legal obligation to report, if applicable.

### 13.7. Documentation and Filing of Analyzed Cases

After the report is submitted, the Compliance Officer must retain all supporting documentation (case file) that served as the basis for classifying the transaction in one category or another. This file must be properly labeled and archived following confidentiality and security standards.

All such files must be centralized and organized together with the corresponding report submitted to the UIAF, and appropriate confidentiality and security measures must be adopted to ensure the full and timely submission to authorities when requested.

This information shall be administered by the Compliance Officer, who will establish rules for authorized personnel to access this information, and it will be preserved for the period specified in this Manual.

### 13.8. Other External Reports

a) **Absence of Suspicious Transaction Report ("A-ROS") to the UIAF:** In the event that no ROS is submitted during a given quarter, the Compliance Officer must report this fact to the UIAF within the first ten (10) calendar days of the month following the end of the respective quarter, via the UIAF's Online Reporting System (SIREL).
b) **Report to the UIAF and the Office of the Attorney General:** Whenever the Company identifies an asset, good, product, or right owned by or under the control or administration of any country, individual, or entity designated by United Nations Security Council Resolutions or its Sanctions Committees, the Compliance Officer must immediately report it to the UIAF and inform the Office of the Attorney General of Colombia through the secure electronic channels designated by these public authorities, in accordance with applicable legal confidentiality requirements.

## 14. DISCLOSURE AND TRAINING

The Compliance Officer, in collaboration and coordination with the Head of Human and Organizational Management at COSMOAGRO, shall be responsible for designing and scheduling training, instruction, and awareness plans regarding the contents of this SAGRILAFT Manual. This program shall be addressed to all employees of COSMOAGRO, in accordance with the general training plan for the System.

Upon the hiring of a new employee, COSMOAGRO's Human Management Department must provide the SAGRILAFT Manual to the employee for their reading and application. In addition, the Department must carry out an induction process and provide training on the contents of the Manual, the System, and in general, the LA/FT/FPWMD risks, as provided for in the training plan. This induction must take place within thirty (30) days following the employee's start date.

This process must be recorded in the employee's personnel file. The Compliance Officer shall be informed of the onboarding of new employees, so that, if deemed necessary, the Compliance Officer may provide special support during the induction process depending on the sensitivity of the area to which the new employee is assigned.

Attendance to training events is mandatory, and sufficient time must be granted for employees to participate, in accordance with the General Training Plan and in coordination with COSMOAGRO's Compliance Officer.

In general terms, the GENERAL PLAN must meet the following conditions:

a) Promote the integration of the SAGRILAFT System into COSMOAGRO S.A.'s corporate culture and core values.

b) Be conducted at least once a year, with documented evidence of the training, including the names of attendees, date, and topics covered.

c) Be communicated as part of the induction process for new employees as a means of raising awareness.

d) Be delivered in an intensive training format to those employees whose duties include the implementation of controls within the System, thereby ensuring proper compliance.

e) As a self-control system, it must be constantly reviewed and updated.

**f)** Implement mechanisms to evaluate the results achieved, in order to assess the effectiveness of the programs and the extent to which the objectives have been met.

## 15. RESPONSE TO AUTHORITY REQUESTS

All information requests from competent authorities concerning the prevention and control of LA/FT/FPWMD shall be handled by the Compliance Officer, with the support of the relevant department responsible for the process. The Compliance Officer shall compile the necessary information, draft the response to the request within the established deadlines, and present it to the General Manager of the Company and the Manager or Head of the corresponding department for approval. The Compliance Officer shall ensure that the response is submitted on time and properly filed within the System's documentation records.

## 16. IMPOSITION OF SANCTIONS

In the event of non-compliance and depending on its severity, the Company shall apply the corresponding disciplinary sanctions in accordance with its internal regulations and the Internal Work Rules.

If any irregularity or violation of the policies and procedures established in this Manual is detected, every employee must immediately report the infraction, even if it has been committed by their direct supervisor, to the Compliance Officer via email. COSMOAGRO guarantees protection against retaliation for those who report such conduct in good faith.

Once a report is received, the Compliance Officer shall conduct a preliminary investigation and submit the findings and their opinion to the Legal Representative, who will apply the disciplinary procedure established in the Company's disciplinary action protocol.

In the event that the report concerns the Legal Representative, the Compliance Officer shall escalate the investigation results to the Board of Directors. If the complaint is against the Compliance Officer, the procedure outlined in Section 10.2 above shall be followed.

## 17. CHANGES, UPDATES, AND PUBLICITY DISCLOSURE

This SAGRILAFT Manual and any changes, amendments, or updates made to it—whether by internal decision or as required by a competent authority—must be approved by the Board of Directors and will be communicated and published in a timely manner at COSMOAGRO's offices and production plant located in the PACIFIC FREE TRADE ZONE in Palmira, Valle, and through the Company website, intranet, or any other appropriate channel as deemed suitable by Management.

COSMOAGRO's Management shall ensure both the current and future dissemination of this Manual to all current and new employees, as well as to all relevant counterparties involved in the execution and development of its business operations and corporate purpose.

## 18. CERTIFICATE OF APPROVAL AND IMPLEMENTATION

This SAGRILAFT MANUAL of COSMOAGRO S.A. was discussed, implemented, and approved by the Company's Board of Directors at its ordinary session held on August Twentieth (20), Two Thousand Twenty-One (2021), as recorded in MINUTES No. 252, and is effective as of that date.

**CHAIRMAN OF THE BOARD OF DIRECTORS:**
(signed) **CARLOS FERNANDO AZCÁRATE ECHEVERRY**

**PRINCIPAL LEGAL REPRESENTATIVE:**
(signed) **LUIS ENRIQUE LAVERDE GÓMEZ**

**COMPLIANCE OFFICER:**
(signed) **RUBÉN DARÍO AGUIRRE RAMÍREZ**

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