




D1 S.A.S

Policy for the prevention of the risks of money  
laundering, terrorism financing and financing  
of the proliferation of weapons of mass  
destruction


Version 1.2

11/18/2024

	FORM	POLICY FOR THE PREVENTION OF THE RISKS OF MONEY LAUNDERING, TERRORISM FINANCING AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.	
	FORM CODE	PO-GRC-1.1	
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## 1. Objectives

This ML/TF/FPWMD Risk Prevention Policy establishes guidelines and directives with the aim of mitigating the risk that D1 S.A.S. may be used to carry out money laundering operations and/or channel resources towards terrorist activities and/or the proliferation of weapons of mass destruction.

## 2. Scope


This policy applies to shareholders, members of the Board of Directors, employees, clients, suppliers, and other third parties related to D1 S.A.S. or company stakeholders.

## 3. Guidelines, requirements and conditions of the policy for the administration, management and control of ML/TF/FPWMD risk


Below, we list the general guidelines defined by D1 S.A.S. to serve as a guide for the behavior and business of all our employees, customers, suppliers, contractors and other related third parties.

### 3.1. General guidelines

- a. This policy will apply to all businesses and operations where D1 S.A.S. identifies ML/TF/FPWMD risk factors.
- b. D1 S.A.S. requires its shareholders, members of the Board of Directors, employees, customers, suppliers, and other related third parties, to comply with the rules regarding Self-Control and Integral Risk Management of Money Laundering, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction, prevailing over the achievement of business and financial goals.
- c. D1 S.A.S. within the current Colombian legal framework and international recommendations, directs its efforts to prevent and control the risk of money laundering and terrorism financing, promoting, and establishing within its organization, an institutional culture on the subject in its management and control bodies, managers, shareholders and in general in all its employees, customers, suppliers, contractors and other related third parties.
- d. D1 S.A.S. has methodologies to identify, measure, control and monitor the risks to which it is exposed, in terms of Money Laundering, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction.
- e. D1 S.A.S. has guidelines for the prevention and resolution of conflicts of interest in this area, which are found in the Company's SAGRILAFT Manual.

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- f. D1 S.A.S. Employees who are directly related to suppliers or customers must ensure that the established procedures are complied with and that all required information is provided according to the products and/or services in question, in accordance with the established guidelines.
- g. D1 S.A.S. prohibits the creation of commercial relations with natural persons or legal entities that have fictitious names or inaccurate names, for which it is not possible to know the origin of their funds and their corporate structure.
- h. D1 S.A.S. monitors the operations of natural persons or legal entities, national or foreign, that due to their profile or the functions they perform may expose D1 S.A.S. to a greater degree to the risk of money laundering and terrorism financing.
- i. D1 S.A.S. has a regime of sanctions that regulates the consequences of non-compliance with the SAGRILAFI by employees, managers and other related third parties, which is enshrined in the Code of Ethics of the Company.
- j. All shareholders, members of the Board of Directors and employees of D1 S.A.S. must place compliance with the ML/TF/FPWMD Risk Management and Self-Control regulations before the achievement of the Company's commercial and financial goals.
- k. D1 S.A.S. monitors all operations, businesses and agreements that have characteristics that qualify them as unusual or abnormal according to the established criteria, for which these are controlled, documented, and reported in the existing formats for these purposes to the Compliance Officer or to the corresponding authorities, as appropriate for the latter.
- l. Employees, without exception, undertake with D1 S.A.S. to participate in training programs on Self-Control and Integral Risk Management of Money Laundering and Terrorism Financing, which will be conducted periodically under the coordination of the Compliance Officer.
- m. All employees of D1 S.A.S. must immediately inform the Compliance Officer of any unusual, attempted or materialized operations of which they are aware, due to their position, role or function, through the mechanisms available for such purpose.
- n. D1 S.A.S. is committed to actively collaborate with the competent authorities in relation to the prevention and control of Money Laundering, Terrorism Financing and Financing of the Proliferation of Weapons of Mass Destruction, giving timely response to their requirements, providing them with all the information deemed relevant and complying with the corresponding legal and regulatory provisions.
- o. Failure to comply with this Policy is considered serious misconduct and implies the application of disciplinary sanctions in accordance with the Internal Work Regulations.

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### 3.2. Guidelines on counterparty engagement

- a. D1 S.A.S. has established that prior to the engagement of its Counterparties it will perform due diligence processes with a risk-based approach described in the procedures related to Due Diligence or Enhanced Due Diligence, which are an integral part of the Company's functional and operational processes.
- b. The results of the Company's due diligence processes are confidential and may not be disclosed by employees to third parties. Failure to comply with this provision shall be considered serious misconduct in accordance with the internal work regulations.
- c. Enhanced Due Diligence will be applied to those Counterparties that (i) the Company considers represent a higher risk; (ii) to those Counterparties considered as Politically Exposed Persons - PEP; (iii) to those located in non-cooperative countries and high-risk jurisdictions and (iv) those that carry out operations with Virtual Assets.
- c. D1 S.A.S. will refrain from initiating, carrying out, having, or maintaining any type of operation or any business, contractual or legal relationship, of any order or nature, if based on the measures adopted and the Due Diligence process it is concluded that the Counterparty, may generate a ML/TF/FPWMD risk.

### 3.3. Guidelines related to payments

At D1 S.A.S., payments and collections made to Counterparties, except for occasional suppliers of petty cash, must be made by electronic transfers and/or checks through banking entities, whose holder must be the natural person or legal entity with whom the engagement or agreement was established.


Given that the use of petty cash represents a risk factor in terms of ML/TF/FPWMD, payments to occasional suppliers are regulated through the Company's Petty Cash Policy.

The Company defines in its ML/TF/FPWMD D Prevention Manual the guidelines for the receipt of cash by Customers in stores.

### 3.4. Guidelines on documentation conservation

- a. The information related to the stages and elements of SAGRILAFT is duly documented, with physical backup and with conservation, control and security procedures that allow its consultation only by those who are

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authorized. The established procedures must also guarantee the integrity, timeliness, reliability and availability of the information.

- b. Documents on Due Diligence processes shall be kept, at least, for the time required by the legislation in force.
- c. The Compliance Officer is responsible for keeping the documents that support the report of any suspicious operation.
- d. Records and files shall be kept for at least 10 years, according to the legislation in force.
- e. The Legal Representative and the Compliance Officer shall guarantee the confidentiality of the information reported to the UIAF. D1 S.A.S. officers who for any reason have access to this information and the related documents must keep them confidential. Officers who violate the confidentiality of the information reported to the UIAF will be subject to the sanctions established in the Code of Ethics and the internal work regulations.

#### 4. Entry into force

This policy shall become effective from the date of approval and disclosure in the company's official channels.

#### 5. Document version control and responsible parties

Version	Description of modification	Date
1.0	<i>Creation of a policy for the prevention of money laundering risks.</i>	<i>08/01/2021</i>
1.1	<i>Review of the policy</i>	<i>03/01/2023</i>
1.2	<i>Review of the policy and adjustments to the guidelines for counterparty engagement and cash payments.</i>	<i>11/18/2024</i>

Version	Prepared by	Reviewed by	Approved by
1.0	<i>Compliance Officer Legal Representative</i>	<i>Compliance Officer Legal Representative</i>	<i>Board of Directors</i>
1.1	<i>Compliance Officer Legal Representative</i>	<i>Control and compliance director – Lina María Torres</i>	<i>Board of Directors</i>
1.2	<i>Compliance Management</i>	<i>Control and Compliance Director</i>	<i>Board of Directors</i>

#### 6. Glossary and terms

The definitions and terms used in this document may be consulted in the document: GL-GRC-1.0-Glosario de Términos Control y Cumplimiento.

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