POLICY OF THE REGIME OF MINIMUM MEASURES OF THE INTEGRAL SYSTEM FOR THE PREVENTION AND CONTROL OF MONEY LAUNDERING, FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

CHAPMAN WILCHES S.A.S., implements and executes the Minimum Measures Regime of the System for the Prevention and Control of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction - SAGRILAFT/FPADM in order to prevent it from being used as an instrument to give the appearance of legality to resources coming from criminal activities or for the channeling of resources towards the realization of terrorist activities, promoting an organizational culture of risk management and compliance with the control policies implemented in the legal framework of Integral LAFT/FPADM risk management, such as knowledge of counterparties (shareholders, clients, suppliers and employees), monitoring of operations, training of personnel in LAFT/FPADM and reporting suspicious operations to the competent authority.

The Minimum Measures Regime Policy of the System for the Prevention and Control of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction - SAGRILAFT/FPADM is mandatory and applies to all employees and third parties (counterparties) linked to the development of its activities of the corporate purpose of CHAPMAN WILCHES S.A.S. The following guidelines for CHAPMAN WILCHES S.A.S., have been implemented within the Minimum Measures Regime of the System for the Prevention and Control of Money Laundering, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction - SAGRILAFT/FPADM, namely:

a) CHAPMAN WILCHES S.A.S. directs its efforts to manage LAFT/FPADM risks.
b) CHAPMAN WILCHES S.A.S. promotes and establishes within its organization, a corporate anti-money laundering and anti-financing culture.
c) CHAPMAN WILCHES S.A.S. promotes and establishes within its organization, a corporate anti-money laundering and anti-financing culture.
of terrorism and financing of proliferation of weapons of mass destruction in all its counterparties. c) CHAPMAN WILCHES S.A.S. establishes requirements for the linking of counterparties in order to comply with the requirements of the law and the internal rules of CHAPMAN WILCHES S.A.S.

d) CHAPMAN WILCHES S.A.S. monitors the operations of natural or legal persons, national or foreign, which may expose the company to a greater degree to the risks of LAFT/FPADM, including Politically Exposed Persons (PEP).
e) CHAPMAN WILCHES S.A.S. monitors the operations of natural or legal persons, domestic or foreign that may expose the company to a greater extent to the risks of LAFT/FPADM, including Politically Exposed Persons (PEP).
e) CHAPMAN WILCHES S.A.S. has guidelines to identify, measure, control and monitor risk factors and associated risks.
f) CHAPMAN WILCHES S.A.S. identifies transactions that have characteristics that qualify them as unusual, suspicious and attempted in accordance with the established criteria, for which these must be controlled, documented and reported to the appropriate authorities.
g) All employees of CHAPMAN WILCHES S.A.S. must immediately inform the Legal Representative on the attempted, unusual or suspicious transactions that come to their knowledge, on the occasion of their position, role or function.
h) CHAPMAN WILCHES S.A.S. implement due diligence procedures and enhanced due diligence, in accordance with the level of risk of their counterparties. i) CHAPMAN WILCHES S.A.S. will stick to public sources and open information to know their counterparties, giving the best use to the information in accordance with the Statutory Law of Habeas Data (Law 1581 of 2012).
j) CHAPMAN WILCHES S.A.S. approves operations or transactions in cash, provided they comply with the policy of cash management, all in order to prevent the risk of LAFT/FPADM.
k) In the event that CHAPMAN WILCHES S.A.S. required to perform international operations, whose origin or destination are countries or territories listed as non-cooperative, or sponsoring terrorism international, enhanced due diligence will be conducted and its approval will depend on the legal representative.
l) Employees of CHAPMAN WILCHES S.A.S., assume the commitment and responsibility to respond in a timely manner to requests made by the legal representative in the exercise of their functions within the framework of the Minimum Measures Regime SAGRILAFT/FPADM.
m) CHAPMAN WILCHES S.A.S. reserves the right to establish a contractual relationship with natural and / or legal persons including partners, managers, principal and alternate members of the Board of Directors, related to OFAC lists, UN, INTERPOL, list of terrorist organizations of the European Union, list of terrorist persons of the European Union, list of terrorist persons of the United States and list of terrorist organizations of the United States

or the lists that the organization defines, once the analysis has been made and subject to the approval of the partners, if the relationship continues, the legal representative shall report to the UIAF and shall inform the Attorney General's Office of the situation.
n) CHAPMAN WILCHES S.A.S., reserves the right to establish a contractual relationship with natural and / or legal persons including partners, managers, principal and alternate members of the Board of Directors, related to crimes sources of LAFT / FPADM once the analysis has been made and subject to the approval of the partners.
o) CHAPMAN WILCHES S.A.S. require the necessary information to support due diligence exhausting all necessary resources to obtain such information, in the event that natural and / or legal persons refuse to provide it, the evidence of the requests made will be kept and will continue with the due diligence procedure with the documents that are available.
p) The documents and records related to compliance with the Minimum Measures Regime for the prevention and control of MLFT/FPADM risks shall be kept for a term of no less than ten (10) years, in accordance with the provisions of Article 28 of Law 962 of 2005, especially those supporting the decision to determine an operation as suspicious and the report submitted to the UIAF.
q) CHAPMAN WILCHES S.A.S. establishes mechanisms to ensure the integrity, timeliness, reliability, confidentiality and availability of information related to the Minimum Measures Regime SAGRILAFT / FPADM.
r) Duty of confidentiality. All information derived from the application of this policy is subject to confidentiality, which means that it may only be known by the competent judicial or administrative authorities if required. This policy of the Minimum Measures Regime of the System for the Prevention and Control of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction - SAGRILAFT/FPADM, may be updated as recommended by the legal representative of CHAPMAN WILCHES S.A.S. and must be approved by the board of partners.

MIRNA PATRICIA WILCHES NAVARRO
PARTNER

CHARLES CHAPMAN LOPEZ
PARTNER