

## 1 OBJECTIVE

1.1 This International Money Laundering and Economic Sanction Policy (the “Policy”) identify applicable law and lay out international mandatory mechanisms and procedures that must be followed by Grupo Proeza, S.A.P.I. de C.V., and its subsidiaries (“Proeza”) in order to prevent money laundering and the financing of terrorism.

## 2 SCOPE

2.1 Applicable to all companies in Proeza including all regions and sites.

## 3 GUIDELINES

### 3.1 Money Laundering

- I. All employees, counselors, directors, officers, advisors, and representatives (the “Collaborators”) must avoid and be alert to information or activities that may be evidence of money laundering. **Annex A** contains a list of applicable anti-money laundering laws.
- II. Money laundering is the criminal practice of filtering ill-gotten gains or “dirty” money through a maze or series of transactions, so the funds are “cleaned” to look like proceeds from legal activities. Money laundering does not have to involve cash at every stage of the laundering process. Any transaction conducted with a bank might constitute money laundering. Although money laundering is a diverse and often complex process, it involves three independent steps that can occur simultaneously:
  - a. **Placement.** The process of placing, through deposits or other means, unlawful cash proceeds into traditional financial institutions.
  - b. **Layering.** The process of separating the proceeds of criminal activity from their origin through the use of layers of complex financial transactions, such as converting cash into traveler’s checks, money orders, wire transfers, letters of credit, stocks, bonds, or purchasing valuable assets, such as art or jewelry.
  - c. **Integration.** The process of using an apparently legitimate transaction to disguise the illicit proceeds, allowing the laundered funds to be disbursed back to the criminal. Different types of financial transactions, such as sham loans or false import/export invoices, can be used.
- III. Money laundering may occur in connection with fraud, robbery, terrorism and racketeering. A transaction that seeks to conceal the nature, source or ownership of funds may be indicative of an act of money laundering. The following is a non-exhaustive list of suspicious activities and transactions, which may occur, and should be promptly reported by e-mail to the Money Laundering Prevention Officer:
  - a. Refusal from a vendor, client, business partners or third party to provide identifying information.
  - b. The background of the vendor, client, business partners or third party is questionable or differs from expectations based on business activities.

- c. Insistence of a vendor, client, business partners or third party to receive payments only with cash or cash equivalents.
- d. Request by a vendor, client, business partners or third party to avoid normal documentation requirements established in the Third-Party Contracting Policy and Supplier Veto or other applicable policy.

IV. Collaborators will not engage or assist to:

- a. Any person or entity engaging in any activity reasonable believed to involve money laundering, terrorist financing or other criminal activity;
- b. Any customer in structuring financial transactions in order to avoid disclosure to governmental or enforcement institutions under the applicable laws; or
- c. To disclose the existence of any investigation or reports of suspicious transactions.

V. Proeza through its administration or corresponding purchasing department or purchasing users will adopt identity verification procedures and software pursuant to which Proeza must endeavor to obtain certain information as established in the Third-Party Contracting Policy and Supplier Veto prior accepting any vendor, client, business partners or third party in order to assess its background, and identity.

### 3.2 Economic Sanctions Money Laundering

- I. Several national and international authorities have published lists through which the following are identified: (i) blocked persons, and (ii) blocked jurisdictions. Proeza's policy is not to hire, whether directly or indirectly with blocked persons nor carry out activities, operations, projects, transactions or business in blocked jurisdictions as per applicable law. Including but not limited to those included in **Annex B** herein.
- II. Proeza does not directly or indirectly involve transactions – including, without limitation, the import or export of goods, technology, or services, payments, or other contacts - with or in relation with the following countries: Cuba, Iran, North Korea, Syria, Sudan, Venezuela, or the Crimean region of Ukraine/Russia.
- III. Prior engaging with any vendor, client, business partners or third party the the Money Laundering Prevention Officer, administration or corresponding purchasing department or purchasing users must perform a screening regarding its main activities to ensure observance of the applicable laws related to economic sanctions as stated in section 3.4 below.

### 3.3 Anti-Money Laundering and Economic Sanctions Clause

- I. In all contracts that Proeza executes with vendors, clients, business partners or third parties that have relationship with governmental institutions must always include the anti-corruption/ anti-money laundering clause established in the Anticorruption Policy.

### 3.4 Screening

- I. Administration, purchasing department or purchasing users will screen any new vendors, clients, business partners or third parties against the lists mentioned in Annex B, at the time of onboarding. Also, may conduct regular screening of all existing vendors, clients, business partners or third parties

to ensure that they have not been added to any list since their screening at onboarding. The respective onboarding area or department will maintain paperwork showing that the appropriate screens are being run. This paperwork should indicate the updated lists were used.

- II. If any transaction, business, or business agreement involves any individuals or entities named on the Annex B lists or breaches or deviations from applicable law on anti-money laundering, then the Compliance and Ethics Committee (the “CEC”), the Extension CEC and/or the Money Laundering Prevention Officer, must consider whether the activity is allowed under any existing authorization or exception. If not, Proeza must either cancel the proposed action or seek any required license.

### 3.5 Training

- I. The CEC can conduct periodic training programs regarding this Policy.

### 3.6 Violations and Disciplinary Measures

- I. Any Collaborator who violates any provision of this Policy will be subject to the appropriate disciplinary action.

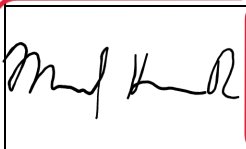
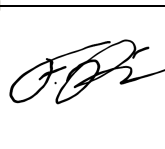


### 3.7 Reporting Suspected Violations

- I. Collaborators have the responsibility to report suspected violations of this Policy through Proeza’s Transparency Line.

### 3.8 Modifications

- I. Any amendments made to this Policy must be reviewed and approved by the CEC.

## 4 REVIEW AND APPROVAL

Version	Issue date	Elaborated by	Reviewed by	Process design validation	Authorized by
1	May 2021	<b>Compliance Lawyer /</b> Manuel Alejandro Herrera Rabago 	<b>Co. Legal Compliance /</b> Fernando Perez Valdes 	<b>Co. Risk, Control and Digitalization /</b> Gerardo Javier Sepulveda Ayala 	<b>Co. Legal and Compliance and CEC Delegate /</b> Nicolas Villarreal Martínez 

## 5 RELATED DOCUMENTS

- 5.1 Code of Conduct
- 5.2 Anticorruption Policy
- 5.3 Third Party Contracting Policy and Supplier Veto

## 6 RECORD OF CHANGES

Version	Date	Change description
1	September 2021	New document

### Annex A

#### Applicable Laws in Jurisdictions where Proeza operates

##### Argentina

- Law 25.246 - Prevention and Control of Money Laundering and the Financing of Terrorism.
- National Criminal Code.

##### Brazil

- Law No. 9,613/1998 (the 'AML Law') created the Council for Financial Activities Control (Coaf) and established a comprehensive framework of anti-money laundering requirements for a wide range of financial institution. There are general requirements—introduced and enforced by the Brazilian supervisory authorities for customer identification, record keeping, suspicious transaction reporting, etc.
- Law No. 10,701/2003 included financing of terrorism as a predicate offence for money laundering, enforcing the obligation for all financial institutions to report transactions suspected of being related to terrorism financing.
- Law No. 12,683/2012 criminalizes money laundering and any associated wrongdoings.
- Law No. 13,260/2016 forbids terrorism and its financing.
- Law No. 13,810/2019 enforces the immediate freezing of terrorist assets, in compliance of United Nations Security Council's sanctions related to terrorist offenses.

##### China

- People Republic of China Anti-Money Laundering Law.
- People Republic of China Criminal Law.

##### India

- Prevention of Money Laundering Law.

##### Mexico

- Federal Law on Prevention, Identification of Operations with Illicit Origin Resources.
- Federal Criminal Code.

##### Thailand

- Anti Money Laundering Act 2542.

##### United States

- United States Patriot Act.

- Anti-Money Laundering Act of 2020.
- Bank Secrecy Act.
- Money Laundering Control Act 1986.
- Money Laundering Suppression Act 1994.
- Money Laundering and Financial Crimes Strategy Act 1998.
- Suppression of the Financing of Terrorism Convention Implementation Act 2002.
- Intelligence Reform and Terrorism Prevention Act 2004.

**Annex B****Blocked persons and economic sanctions lists.**

1. Specially Designated Nationals; and Blocked Persons or Sanctioned Countries (including terrorists and narcotics traffickers) of the Office of Foreign Assets Control of the United States Department of Treasury (OFAC)- <http://www.treas.gov/offices/enforcement/ofac/sdn/>
2. Sanctions and Blocked Persons lists issued by the United States, particularly the Specially Designated Nationals and Blocked Persons List (SDN List) and Foreign Sanctions Evaders List (FSE List), and the Blocked Persons List of Executive Order 13599 (EO 13599 List) - <https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>
3. Consolidated List of Persons, Groups and Entities Subject to European Union Economic Sanctions - <https://www.un.org/securitycouncil/content/un-sc-consolidated-list>
4. List of Blocked Persons and Jurisdictions issued by the Mexican Banking and Securities Commission - [https://www.cnbv.gob.mx/PrevencionDeLavadoDeDinero/Documents/VSPD\\_Listas%20%20%20130701.pdf](https://www.cnbv.gob.mx/PrevencionDeLavadoDeDinero/Documents/VSPD_Listas%20%20%20130701.pdf)
5. List of Blocked Persons and Jurisdictions issued by the Mexican Tax Administration Service - <https://sppld.sat.gob.mx/pld/interiores/listas.html>
6. List of Blocked Persons and Jurisdictions issued by the Mexican Tax Administration Service - <https://sppld.sat.gob.mx/pld/interiores/actualizacionlistas.html>

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