

IMAGINE WHAT
WE CAN BUILD TOGETHER



SELF-CONTROL

POLICY FOR MONEY LAUNDERING AND TERRORISM FINANCING RISKS





According to the commitment of **Cementos Argos S.A.** and its subordinated companies (hereinafter Argos) to promote integrity and transparency in our operations and strengthen an institutional culture of ethics, good governance and compliance, in Argos we have adopted this policy as a general framework for action and decision-making contributing to the prevention and self-control in our operations and businesses of the risks of money laundering, terrorism financing and proliferation of weapons of mass destruction. This policy also sets forth the general parameters guiding the efficient, effective and timely adoption of the self-control measures of these risks in our company.

With this policy and the other measures adopted within the framework of the Global Governance and Compliance Program for the prevention, control, detection and mitigation of money laundering and terrorism financing risks we intend to prevent our operations from being used to channel resources to fund terrorism or the proliferation of weapons of mass destruction and prevent our business from being used as an instrument to hide, handle, invest or utilize resources from illegal activities related to the crime of money laundering or any of its source crimes.

The foregoing allows us to safeguard our good reputation, minimize the risk of loss of financial resources, avoid the imposition of fines or sanctions, ensure regulatory compliance and enhance the action values and principles adopted by Argos.



SCOPE

This policy applies to all employees, managers and directors of Cementos Argos S.A. and its subordinated companies, who shall observe at all times the provisions herein, regardless of the country they are in.



ACTION GUIDELINES

From the understanding of the realities, characteristics and needs of our businesses, economic activity, markets and jurisdictions where we operate and considering the exposure level of Argos to risks of money laundering, terrorism financing or the proliferation of weapons of mass destruction, we adopt the measures necessary for the self-control of these risks, following for such purpose the applicable legal framework and the best international practices in these matters¹.

Through these measures, we have implemented a system for the management and self-control of the risks of money laundering, terrorism financing or the proliferation of weapons of mass destruction² as a fundamental part of integral risk management, which requires for its proper functioning that the company and the addressees of this policy:



Refrain from directly or indirectly participating in any conduct related to terrorism, terrorism financing or the proliferation of weapons of mass destruction, money laundering or their source crimes.

¹ Specially, those enacted by the Financial Action Task Force (FATF) and the Financial Action Task Force of Latin America (GAFILAT).

² The system is framed in the Global Governance and Compliance Program.



Comply at all times with laws and regulations related to the management of risks of money laundering, terrorism financing or the proliferation of weapons of mass destruction, prevailing over the achievement of commercial or financial goals.



Identify the situations that may represent risks for Argos related to activities of money laundering, terrorism financing or the proliferation of weapons of mass destruction in the operations, business or transactions carried out by the company and in the event that any of these actions exist, they should be informed to the Compliance Officer in a timely manner.



Periodically carry out the necessary activities to segment, identify, measure, control and monitor risk factors, causes and impacts against the risks of money laundering, terrorism financing or the proliferation of weapons of mass destruction.




Develop activities that demonstrate due diligence and care in the relationship and monitoring of third parties that allow the knowledge and identification of counterparts' background or alerts with whom Argos executes or intends to establish commercial, labor or contractual relationships, including customers, suppliers, employees, shareholders and strategic allies.



Evaluate the risks and impacts related to money laundering, terrorism financing or the proliferation of weapons of mass destruction to which the company can be exposed when establishing new businesses, developing new channels, products or services.



Timely identify unusual or suspicious operations attempted or concluded that come to our attention, due to our position, role or function and timely report them through the mechanisms established by Argos for this purpose and before the competent authorities if appropriate.



The methodological detail for the adequate implementation and dissemination of the measures and action principles set forth above are detailed in the Manual of the Global Governance and Compliance Program, in the Code of Business Conduct, in the Compliance Due Diligence Procedure for Counterparty and in the other guidelines and business rules established by Argos which purpose is the management and self-control of the risks of money laundering, terrorism financing or the proliferation of weapons of mass destruction.



CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with this policy will constitute a violation of the employment or commercial contract with Argos and will entail the application of sanctions that may even imply the termination of the labor or commercial relationship. Additionally, it may imply sanctions imposed by the competent authorities.



CONCERNS AND ALERT AND WRONGDOING REPORTS

In the event of concerns regarding the application of this policy, make a verbal or written consultation with the Chief Compliance Officer (**oficialdeconduc@argos.com.co**).

In any case, when in doubt of an activity or action that we intend to execute that may eventually imply conduct contrary to what is established in this policy, we must refrain from acting until we have the Chief Compliance Officer's concept.

In case of knowing of an incorrect act, contrary to what is established in this policy or the other guidelines adopted by the company for the management and self-control of the risks of money laundering, terrorism financing or the proliferation of weapons of mass destruction, we must inform it as soon as possible through the Transparency Hotline (**lintransparencia@argos.com.co**).



ARGOS

A company of  **GRUPO ARGOS**