
ANTI-MONEY LAUNDERING PROGRAM



Nit: 901568975-2
Carrera 49 # 61 sur 540 Winery 102 The Regional Winery Park

MONEY LAUNDERING PROGRAM SANROJAL FOUNDATION

1. Introduction

1.1 Purpose

The purpose of this Program for the Prevention of Money Laundering and Financing of Terrorism (PLAFT) is to establish the policies, procedures and controls necessary to prevent the Sanrojal Foundation from being used for money laundering or terrorist financing.

1.2 Scope

This program applies to all operations and activities of the Foundation, including the receipt of donations, the making of payments, the investment of funds and the hiring of staff.

1.3 Responsibilities

- **Board of Directors:** Responsible for the approval and implementation of this program, as well as the allocation of the necessary resources for its effective operation.
- **All staff:** Responsible for complying with the policies and procedures established in this program and for reporting any suspicious activity that may be related to money laundering or terrorist financing.

2. Definitions

- **Money Laundering:** Process by which the illicit origin of funds obtained from criminal activities is concealed.
- **Financing of Terrorism:** Provision, use or collection of funds intended for terrorist activities.

3. Commitment of the Foundation

3.1 Compliance with laws and regulations

The Foundation is committed to complying with all national and international laws and regulations related to money laundering and financing of terrorism, including:

- Law 1778 of 2016
- Law 599 of 2000 (Criminal Code)
- Law 1336 of 2009
- Financial Action Task Force (FATF) Standards.

3.2 Obligation of staff

All employees and collaborators of the Foundation are obliged to comply with this policy, without exception.

4. Procedures and Controls

4.1 Identification and Verification of Donors

- Collection of information: Donors will be asked for the following information:
 - Full name
 - Address
 - Identification number
 - Any other relevant information
- **Identity verification:** Donors' identity will be verified by consulting identity documents and performing cross-checks against public databases.
- **Enhanced due diligence:** Enhanced due diligence measures will be applied for high-risk donors.

4.2 Transaction Monitoring

- **Continuous monitoring:** Transactions will be monitored on an ongoing basis to detect unusual or suspicious activity.
- **Establishment of thresholds:** Transaction thresholds will be established to identify transactions that exceed certain amounts or that exhibit risk characteristics.
- **Record keeping:** Records of transactions will be kept for a minimum period of 5 years.

4.3 Suspicious Activity Reporting (SAS)

- **Reporting obligation:** A report shall be submitted to the competent authorities of any suspicious activity.
- **Content of the report:** The report must include all relevant information on the suspicious transaction, as well as the identity of the donor involved.

4.4 Risk management

- **Risk assessment:** A periodic assessment of the risks of money laundering and terrorist financing shall be conducted.
- **Implementation of control measures:** Based on the risk assessment, control measures shall be implemented to mitigate such risks.

4.5 Training

- **Regular training:** Regular training shall be provided to all staff on PLAFT.
- **Specific training:** Training must be job-specific and up-to-date with the latest regulations and best practices.

5. Audit and Ongoing Review

5.1 Internal Audits

The Foundation will conduct periodic internal audits to assess the effectiveness of the program and to identify areas for improvement.

5.2 Policy Review

This policy will be reviewed and updated regularly to reflect changes in applicable laws and regulations.

6. Sanctions

6.1 Disciplinary Measures

Failure to comply with this policy may result in disciplinary measures, including verbal or written warning, temporary or permanent suspension of employment, and reporting to the appropriate authorities.

6.2 Communication of Sanctions

Applicable sanctions for failure to comply with this policy will be communicated to all staff in a clear and transparent manner.

7. Contact

7.1 Contact Information

If you have any questions about this policy, please contact us by e-mail: direccion@fundacionsanrojal.org.

7.2 Reporting Channel

The Foundation has established a digital reporting channel so that staff can report any suspicious activity or breach of this policy in a confidential manner.