
MONEY LAUNDERING AND TERRORISM FINANCING PREVENTION POLICY



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

Policy for the Prevention of Money Laundering and Financing of Terrorism

Sanrojal Foundation

1. Introduction

The Sanrojal Foundation is firmly committed to preventing the misuse of its services for money laundering and the financing of terrorism. This policy establishes the procedures and controls necessary to comply with the laws and regulations applicable in Colombia, as well as with relevant international regulations.

2. Regulatory Framework

This policy is aligned with the following Colombian laws and decrees:

- Law 1778 of 2016: Establishes measures to prevent money laundering and the financing of terrorism.
- Decree 1068 of 2015: Regulates the System for the Prevention of Money Laundering and the Financing of Terrorism (SPLAFT).
- Law 1908 of 2018: Modifies and reinforces aspects related to the prevention of money laundering.
- External Circular 100 of 2020 of the Superintendency of Companies: Provides guidance on the implementation of risk management systems.

3. 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.
- **Due diligence:** Process of identifying and verifying the identity of donors and beneficiaries, as well as the assessment of the associated risk.

4. Commitment of the Foundation

- The Sanrojal Foundation is committed to complying with all national and international laws and regulations related to money laundering and the financing of terrorism.
- All employees, collaborators and directors are required to adhere to this policy and to actively participate in its implementation.

5. Procedures and Controls

- Identification and Verification of Donors:
- Due diligence procedures will be carried out to identify and verify the identity of donors, including the collection of basic information such as name, ID, address and source of funds.
- Risk Assessment:
- A risk assessment will be carried out to identify areas vulnerable to money laundering and terrorist financing activities, considering the profile of donors and the characteristics of transactions.
- Transaction Monitoring:
- We will implement automated and manual systems to monitor and detect unusual or suspicious transactions, establishing clear thresholds for further review.
- Suspicious Activity Reporting:
- Any suspicious activity will be reported to the Financial Information and Analysis Unit (UIAF) in accordance with established legal obligations.

6. Training

- The Foundation will provide periodic training to all employees and collaborators on the prevention of money laundering and terrorist financing, ensuring that they are informed about relevant policies, procedures and legislative changes.

7. Audit and Review

- Periodic internal audits will be conducted to assess the effectiveness of this policy and the procedures implemented.
- This policy will be reviewed and updated annually or when significant changes in applicable laws and regulations occur.

8. Sanctions

- Failure to comply with this policy may result in disciplinary actions including, but not limited to, suspension or dismissal, as well as notification to the competent authorities.

9. Contact

- For any questions or concerns about this policy, please contact:
direccion@fundacionsanrojal.org.