



Anti-Money Laundering Policy and Financing of Terrorism



1. Concept

Cox voluntarily assumes (despite not being an obligated subject as its corporate purpose and activities and business are different from those entities that are obligated in an imperative manner by the applicable regulations, such as financial or credit entities, insurance intermediaries, etc.) the principles and obligations (to the extent that they are applicable or adaptable to its activity and organization) established by the applicable regulations on the prevention of money laundering and terrorist financing, among others, Directive 2005/60 / EC of the European Parliament and of the Council, Directive 2006/70 / EC of the Commission, Regulation CCE No. 1781/2006 of the European Parliament and of the Council, Law 10/2010 of April 28 and Royal Decree 304/2014 of May 5 of the Regulation of the previous law, both of the Kingdom of Spain, and other similar ones such as Law 27693 of 2002 of Peru, the Money Laundering Control Law of 1986 of the United States of America, the United Nations Convention against Illicit Traffic in Narcotic Drugs and Controlled Substances.

This Policy is binding on all employees, managers and directors, and the supervision and control of its proper application is the responsibility of management and administrators. All actions carried out in the exercise of the professional functions of employees must be guided by knowledge, rigor, order and responsibility. Any action that implies a violation of the law is expressly and strictly prohibited. The tolerance level is zero.

Its purpose is to establish the appropriate procedures for compliance and collaboration with the regulations on the prevention of money laundering and terrorist financing, as well as to prevent or prevent the company from being used for these purposes. It is aimed at developing procedures and controls that verify, prevent and prevent collaboration with persons who carry out money laundering activities or being used by them for such purposes.

2. Content

Whitening includes:

- The conversion or transfer of assets (of any type, tangible or intangible, liquid or not, including electronic transactions) with knowledge of their origin into criminal activities for the purpose of concealing their origin or ownership.
- The concealment of the origin, location, movement or ownership of said goods.
- The acquisition or use of such assets, and their disposition.
- Participation in the above activities.

Terrorist financing includes:

- Supply, deposit, distribution of funds or assets with the intention of using them by their owners to commit terrorist crimes, directly or indirectly.

All of the above regardless of the place of origin of said assets or funds and the place of their possible acquisition or disposal.



3. Obligation of identification and transparency

Client is understood to be any natural or legal person with whom the company is going to start a business relationship and who:

- Be a lender of funds (in any currency)
- Be a donor of funds, aid or any kind of goods or services
- Former senior public officials
- Customers
- Partners (joint ventures, consortia, etc.), Trusts, Confidentialities and other forms of assets without their own legal personality.

With respect to every Client, the company is obliged to:

- a) Identify the natural or legal person in a reliable manner. If it is an intermediary, interposed or fiduciary person, identify the person they represent.
- b) In the case of legal entities, obtain documentation proving the ownership structure of those persons who have control or a stake greater than 50%.

Identification will be verified by means of original documents or certified copies (or similar) from the applicable country of origin, such as identification card or document, passport, residence card, deed or act of incorporation, tax identification number, appointment and power of attorney of the signatory. Photocopies, faxes or similar documents must not be accepted.

In no case will business relations be maintained (except for prior commercial dealings) with persons not directly identified. Especially and even if identified in the following cases:

- People included in public lists (that the company has in each case or corresponding country) related to criminal activities, drug trafficking, terrorism or others.
- Unidentified persons or those who make it impossible to verify the origin of the funds, or who refuse to provide such identification.
- People who make donations, contributions or any other type of generosity without prior identification.
- People who, due to their activity, should be registered in an official registry and are not.

The above information, if collected and stored as a database, will be subject to the confidentiality obligation established in the Data Protection regulations, and its use will be subject to the provisions for the creation and notification of personal databases.



4. Obligation to report

If there is evidence, proof or suspicion that a Cox employee, competitor, client or supplier is violating money laundering prevention laws, this must be reported in accordance with the provisions of the "Reporting Channel" (canal_denuncias@grupocox.com).

Government and judicial authorities have the power to impose very severe economic penalties for violations of money laundering prevention laws, both on the company and on the individual perpetrator of the illicit conduct and on his superiors and managers. In addition, such conduct may entail not only civil or administrative liability but also criminal liability, including prison sentences, for the perpetrator of the crime and for the legal entity and its directors and managers.

5. Prohibited/allowed behaviors

➤ **The conduct prohibited to each employee is:**

- Accepting cash as a means of payment; accepting suspicious or unusual market discounts or rebates when purchasing products.
- Offering, promising or in any way giving, facilitating, authorizing or consenting to payments, gifts, goods or facilities, to any person (whether private or official, natural or legal person; hereinafter " **official** ") directly or indirectly (through intermediaries) in any country (even where they may be legally permitted) with the intention of influencing the acts and decisions of that person or as a reward for one already carried out, in order to obtain, retain or access a competitive advantage, business or contract (hereinafter " **bribery** ").
- A bribe may consist of money, goods, services, travel or subsistence expenses, payment of bills on behalf of third parties, personal favors or influence with third parties, charitable contributions or contributions to political parties or other types of associations, job offers, debt forgiveness, etc.
- Making, receiving or offering a facilitation payment, reward or reward to or from an official or private individual for non-arbitrary administrative acts in order to accelerate or obtain them (except if there is a serious risk to health or safety).
- Making donations or contributions to entities, political parties or associations without first carrying out due diligence.
- Receiving gifts, payments, etc. from third parties, outside the limits accepted by the company's rules (commercial gifts of reduced value and previously authorized).

All of this applies to conduct outside the purely commercial context and in a reasonable and transparent manner. Thus:

- Reimbursement of business travel expenses should not be made directly to the official, but rather, to the extent possible, directly to the service provider for payment, or otherwise, to the office, department or agency to which the official is assigned.



- Always obtain the corresponding invoices and proceed with their correct accounting.

➤ **The expected behaviors of each employee are:**

- The correct recording of all operations and transactions in the official accounting books.
- Due prior legal advice.
- The necessary investigation (due diligence) prior to any hiring of external collaborators who perform agency or intermediary functions before public officials.
- The proper recording in the internal authorization system of the entire contracting process, and the signing of an express and clear written contract for every transaction.
- Expenses or gifts that are strictly commercial or hospitality-related (invitations, corporate business gifts (books, material with the company logo, etc.)) must be reasonable, within the public order, in accordance with Cox policy and with the one that applies to the beneficiary, and must be billed to the company (and never through third parties or paid personally by the employee).
- Make donations or contributions to entities, political parties or associations with prior due diligence and within the limits and compliance with all requirements established by the legislation applicable to both the issuer and the country of destination.

6. Control system

- Cox's mandatory internal regulations (**Crime Prevention and Compliance System Manual**) detail the due diligence processes, the limits and requirements for receiving gifts, the conditions of agency and intermediation contracts are, and must be at all times, known and complied with by all employees.
- The **KYC/KYP Due Diligence Questionnaire** must be completed for any commercial relationship with a client, partner or supplier, pre-agreement or contractual. Completion of the questionnaire will be a necessary requirement prior to the client's registration in the system (SAP) and, therefore, for the start of any commercial relationship (acquisition of goods and provision of services). The KYC questionnaire will be validated by the Compliance department.
- **Money Laundering Red Flags All** Cox employees must report any suspicious findings or any of the following "red flags" to the Compliance Officer. This list is not exhaustive,
 - A proposed Third Party who is reluctant to provide complete information, or provides insufficient, false or suspicious information, or is anxious to avoid reporting or record-keeping requirements.



- Payments using monetary instruments that appear to have no identifiable link to the third party or have been identified as money laundering mechanisms.
- Attempts by a third party or proposed business partner to pay in cash.
- A third party that has a poor business reputation or a reputation for unethical conduct, including reports of suspicious, unethical or illegal conduct about itself, its representatives or its employees.
- Allegations that the third party has made or is likely to make prohibited payments or facilitation payments to officials.
- The Third Party does not have a compliance program or code of conduct and refuses to adopt one or adhere to Cox's while its contract is in effect.
- Other companies have terminated the third party for inappropriate conduct.
- Early repayment of a loan in cash or cash equivalents.
- Orders, purchases or payments that are unusual or inconsistent with the third party's trade or business.
- Unusually complex transaction structures, payment patterns that do not reflect a real business purpose, or unusually favorable terms.
- Unusual transfers of funds to or from countries unrelated to the transaction or illogical for the third party.
- Transactions involving locations identified as tax havens or areas of known terrorist activity, narcotics trafficking or money laundering activities.
- Transactions involving foreign or offshore banks, unlicensed money remitters or currency exchangers or non-bank financial intermediaries.
- Inability or difficulty to verify an entity's corporate history or an individual's background and experience.
- Doubts about hiring a Third Party because they lack the personnel, facilities or experience to carry out relevant work.
- The Third Party lacks relevant industrial/technical experience or a "track record" with the product, service, field or industry.
- The Third Party's plan for carrying out the work is vague and/or suggests it is based on contacts or relationships.
- Negative reports in the media or local business community regarding the third party's integrity or legitimacy, such as a reputation for illegal, inappropriate or unethical conduct.



- Structuring transactions to avoid recordkeeping or reporting requirements, such as multiple transactions below reportable threshold amounts.
- Requests to transfer money or return deposits to a third party or unknown or unrecognized account

7. The **whistleblower channel** The Cox Reporting Procedure is common to all five companies and to companies controlled by Cox. The confidentiality of the whistleblower is guaranteed, as is the transparency and objectivity of the reporting procedure and its resolution. The Reporting Procedure regulates this process in detail.

8. **Entry into force** : This document enters into force upon approval by the Board of Directors and will remain in force until it is updated, revised or repealed. The current version, revised in September, 29, 2024, is the current one, approved by the Board of Directors on November, 21, 2024. This policy must be kept up to date and may be revised annually, and on an extraordinary basis, whenever there are changes in the strategic objectives or applicable legislation, with the Compliance Director submitting a proposal for modification to the Compliance Committee, and from there to the Board of Directors.

Cox ABG Cox			
Policy	• Money laundering and FT		
Responsible	• Board of Directors		
Area	• Corporate – Regulatory Compliance		
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1	September 29, 2024 / Nov 21, 2024	majv	