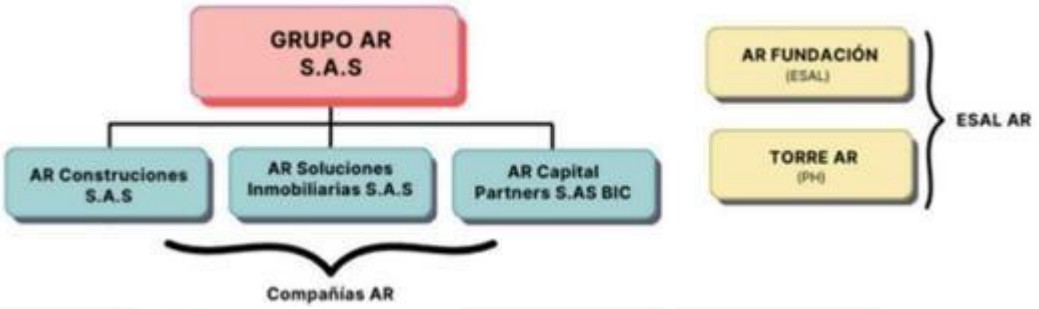
The Business Group and its shareholders, as well as the managers of the Group Entities (See Graph 1), are committed to proper compliance with national and international regulations. The Policies, the SAGRILAFT Manual and the Compliance Officer were approved and appointed by the Board of Directors of the Obligated Entities. Given this, a process has been carried out to identify the own risks to which the Group may be exposed due to conduct associated (Action and/or omission) with ML/ TF/PWMDF and taking into account (A) external factors, such as (i) regulatory context; (ii) geographic areas, goods and services; and (iii) the stakeholders; and (B) internal factors, such as (i) kind of business, operation, products and services offered; (ii) main goods and services required for its activity; (iii) Counterparts; and (iv) organizational structure and relevant bodies.



Graph 1: Group structure

As a consequence of the mentioned risk evaluation, The Group has implemented a Comprehensive Self-monitoring and Risk Management System for ML/TF/PWMDF ("SAGRILAFT"), whose policies and procedures are contained in the Manual (Internal) and will be compulsorily applicable to the Obligated Companies (i) GAR and (ii) AR Construcciones, subject to the specific determination of those policies and procedures applicable to the other Entities of the Group, as a good practice.

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The obligation or not to implement a SAGRILAFT is applicable to Obligated Companies, a quality that is not lost for an individual company by the fact of being subject to control or due to the existence of a Business Group. In this context, The Group has decided to integrate a single system in compliance with the standards applicable to the Group Entities.

1. SCOPE

SAGRILAFT is applicable to the Counterparties of the Group Entities, who will be understood to be bound by virtue of any contractual relationship they have with each of them, and to all those Persons who intervene or act towards third parties in the name and representation of the Group Entities.

2. MAIN DEFINITIONS

Counterparties: These are the Persons with whom the Group has business, contractual or legal ties of any kind, including Directors, employees, contractors, clients and suppliers of products and services, Special Counterparties, Dependent and Independent Counterparts;

Compliance Officer: The Person who within each Group Entity will have the responsibility of ensuring the application, control, execution and supervision of SAGRILAFT. That same Person may, if decided by the Boards of Directors of each Group Entity, assume functions in relation to other Risk management systems such as the Transparency and Business Ethics Program (PTEE in its Spanish acronym);

Contagion Risk: Possibility of loss that The Group may suffer, directly or indirectly, due to an action or experience of a related party. The linked party includes Persons who have the

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possibility of exercising influence over the Group and the Final Beneficiaries;

Due Diligence: Process by which the Group adopts measures to understand the Counterparty, its business and operations, and consists of (i) carrying out a periodic analysis exercise from a legal, accounting and financial point of view, whose purpose is to evaluate the existence, nature and magnitude of the ML/TF/PWMDF risks that may arise within the Group and in relation to the Counterparties; (ii) act with the necessary prudence and diligence so that the Directors can make sufficiently informed decisions in relation to specific transactions, projects, activities, business partners and personnel, and in general relations with Counterparties, among others;

Final Beneficiary: Natural person(s) who ultimately own(s) or control(s) a client or the natural person on whose behalf a transaction is made. It also includes the Person(s) that exercise(s) effective and/or final control, directly or indirectly, over a legal Person or other structure without legal capacity;

Intensified Due Diligence: It is the process through which additional and more rigorous measures are adopted to understand Special Counterparties, their business, operations, volume of transactions, among others, due to the greater risk that they represent for the Group. This also implies the application of stricter Risk controls;

ML: It is (i) the crime of money laundering typified in article 323 of the Penal Code, entitled “Asset laundering” or any of its source crimes and/or (ii) the acquisition, possession or use of property, knowingly , at the time of receipt, that such property originates from a crime or crimes, or from an act of participation in such crime or crimes and/or (iii) the processing of criminal proceeds in order to conceal its illegal origin, with the in order to legitimize the illicit profits of crime;

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PEP: Means Politically Exposed Persons, that is, national or foreign Public Servants who, by reason of their position, have been assigned or delegated functions of (i) issuing rules or regulations; (ii) general management; (iii) formulation of institutional policies and adoption of plans, programs and projects; (iv) direct management of State assets, money or securities; (v) administration of justice or administrative sanctioning powers; (vi) individuals who are in charge of directing or managing resources in political movements or parties; and (vii) who is defined as such by current Colombian regulations. This quality will be held by those Persons who meet the description explained above and during the two (2) years following the abandonment, resignation, dismissal or declaration of non-subsistence. of the appointment, or any other form of dismissal from the position. For the purposes of this Manual, the term PEP also includes publicly exposed persons, that is, persons who enjoy public recognition;

PWMDF: Proliferation of weapons of mass destruction Financing, that is, any act that provides, funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, transfer of material, fractionation, transportation, transfer, deposit or dual use for illegitimate purposes in contravention of national laws or international obligations;

TF: It is (i) the crime of financing terrorism typified in article 345 of the Criminal code, entitled “Management of resources related to terrorist activities” and/or (ii) the financing of terrorist acts and of terrorists and terrorist organizations;

Warning Signal: Fact, situation, ML/ TF/PWMDF Event, amount, quantitative or qualitative indicator, financial ratio or other information that the Group determines as relevant, from which the possible existence of an event or situation that is beyond what the Group considers normal or that is not part of its ordinary course of business can be inferred opportunely or prospectively.

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3. GENERAL OBJECTIVE

Contribute to establishing standards of conduct to prevent and expressly prohibit ML/ TF/PWMDF events that impact or may impact The Group's local, regional and international operations, and allow Counterparties to distinguish between conduct that is generally acceptable from conduct that is not, responding to the regulations and best practices applicable to the Group in matters of ML/ TF/PWMDF.

4. SPECIFIC OBJECTIVES

In accordance with the fulfillment of the previous general objective and in accordance with the internal documents of the Group which are part of SAGRILAFT, the following specific objectives must also be achieved:

- Prevent and control that the Group Entities be used as an instrument for conduct related to ML/ TF/PWMDF Events;
- Define the main policies, standards and procedures that must be applied in general by the Group's Counterparties and especially by the Compliance Officer, in relation to the prevention of ML/TF/PWMDF events;
- Contribute to the creation of a of prevention of risks associated culture with ML/ TF/PWMDF within the Group;
- Identify the factors that give rise to the Risk and the Risks Associated with the ML/TF/PWMDF in The Group;
- Develop widely within the Group, a “zero tolerance” policy with ML/TF/PWMDF events and express a strong, explicit and visible commitment on the part of the Group and its Administration in relation to the prevention of ML/TF/PWMDF events within or in connection thereto;

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- Describe and implement some of the main aspects of SAGRILAFT, Risk Management, Risk Analysis, and SAGRILAFT Evaluation;
- Mitigate or eliminate the Risks and ML/TF/PWMDF Associated Risks to the Group.
- Describe the activities that must be implemented with respect to current and future Counterparties of the Group Entities and with respect to the knowledge of these;
- Make efforts so that the Counterparties of the Group Entities acquire a commitment regarding the prevention of conduct related to ML/ TF/PWMDF;
- Terminate contractual relationships with Counterparties involved in ML/TF/PWMDF Events; Carry out the ROS (Suspicious Operation Report).

5. SPECIFIC OBJECTIVES OF OBLIGATED COMPANIES

Groups that are part of SAGRILAFT must also achieve the following specific objectives in relation to the Required Companies:

- Adopt policies and procedures that enable the efficient, effective, and timely operation of SAGRILAFT in all areas of the Obligated Company(ies);
- Implement policies and procedures that guide the conduct of their Counterparties;
- Implement and carry out a Due Diligence process with respect to their Counterparties.
- Implement a Counterparty knowledge policy, in accordance with best practices and the requirements of current regulations regarding the prevention and control of ML/TF/PWMDF risk;
- Establish or determine ML/TF/FPADM red flags for the knowledge of all internal Counterparties of the Obligated Company(ies);
- Generate internally and externally a responsible image regarding conduct related to ML/TF/PWMDF acts;

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- Implement policies and mechanisms to control and supervise the effectiveness and adequacy of the ML/TF/PWMDF control system;
- Generate internally and externally a responsible image with regard to conduct related to ML/TF/PWMDF acts;
- Implement policies and mechanisms to control and supervise the effectiveness and compliance of the SAGRILAFT.

6. INTEREST POLICIES

Policy for the prevention of ML/TF/PWMDF events and "zero tolerance" for ML/TF/PWMDF.

- The Group is committed to the prevention of ML/TF/PWMDF events in relation to the businesses it conducts, which is why all operations carried out by the Group must comply with the highest standards of conduct. This implies, without limitation, compliance with applicable regulations on ML/TF/PWMDF and, in general, any activity that involves or appears to involve fraudulent or criminal conduct;

- With the adoption and dissemination of the Manual, the Group and its Administrators declare and unequivocally express to their Counterparties that they do not tolerate or admit any type of act, operation, or business, contractual, or legal relationship of any kind or nature that has any type of relationship, purpose, or effect, direct or indirect, with ML/TF/PWMDF, as well as with any Counterparty or potential Counterparty and/or any of the Ultimate Beneficial Owners and/or Administrators and/or parent companies and/or subsidiaries and/or affiliates and/or affiliates of either, that is directly or indirectly linked to ML/TF events.

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Policy in relation to the management of cash and petty cash funds: With regard to the management of cash and petty cash, the Group Entities must, among others, take into account the following considerations:

- Always leave a detailed accounting record of the management, destination and use of money from petty cash, consignment and cash payments, in all applicable cases;
- All payments and collections from Counterparts will be made through Bank transfers and/or checks through banking and financial institutions and cash payments, where applicable;
- The Group will only handle cash for payments that are currently authorized in its cash and investment and petty cash management policy, in accordance with the policy for fixed petty cash funds and instructions for cash and investment management;
- The use of petty cash to pay bribes is prohibited.

Policy for Knowledge, linking and contracting of Counterparties and potential Counterparties.

The activities to be accomplished for the due diligence process are set out in the ***Due Diligence Process document***, which is integral part of the SAGRILAFT Manual. Likewise, it must be considered that:

- The Group must ensure that the standards of the Manual are reflected during the recruitment, promotion, training, performance evaluation and remuneration of counterparties and potential Counterparties;
- For counterparties that intend to be linked as shareholders, the due diligence process will be based on the checking of binding lists and other control lists and requesting a

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certification of the origin of resources to be invested;

- The Group will take all necessary measures and Due Diligence to know the potential Counterparties before carrying out or having with them any type of operation or any business, contractual or legal relationship of any order or nature;
- Among the mechanisms and sources of information that the Group must use to know its potential Counterparties and their Final Beneficiaries, and stay updated on its Counterparties and their Final Beneficiaries, it must always include:

  (i) Background consultation in the Binding Lists and Checklists.

  (ii) Verification of the veracity of the information received, using means such as and without limitation, the following, depending on the case:

  (A) Via telephone.

  (B) Directly at the main address of the Counterparty or potential Counterparty;
- The Group will take all necessary measures and Due Diligence to stay updated and know its Counterparts, while it is carrying out or has with them any type of operation or any business, contractual or legal relationship of any order or nature. Said measures and Due Diligence must be carried out when the Compliance Officer determines it, but at least once (1) once a year. For this purpose, the Group will periodically send an email to each Counterparty, informing that the Group is starting a process of updating information. The data message must ask the Counterparty to update its information and send it to the Group within the following ten (10) business days, after which the Group must follow up by different means to obtain the response;
- The Group will take all reasonable measures so that the Counterparts are aware of the policies related to the prevention of activities outside the law, this can be done through the website;
- If applicable, performance bonuses or other remuneration incentives granted by the

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Group to any Counterparty must be duly documented and have the approval of the corresponding Legal Representative.

Likewise, they must be periodically reviewed jointly by the Compliance Officer to verify that these are reasonable and are not promoting ML/TF/ PWMDF events in the Group;

- The Group will analyze and expand due diligence from initiating, carrying out, having or maintaining any type of operation or any business, contractual or legal relationship, of any order or nature, with any Counterparty or potential Counterparty, if based on the measures adopted and the Due Process Diligence concludes that a Counterparty or potential Counterparty and/ or any of its Final Beneficiaries and/or Administrators and/or parents and/or subsidiaries and/or subsidiaries and/or affiliates, directly or indirectly in ML/TF/ PWMDF Events:
  (i) (A) has been or is being investigated by any national or foreign Government Authority, or (B) has been or is being reported by the national or foreign press, or by any national or foreign media, mass or not , or (C) has been included in any national or foreign list: for having incurred or participated, in any capacity or in any capacity, directly or indirectly, in practices, acts, omissions or crimes, related directly or indirectly, with an Event of ML/FT/ PWMDF or in the commission of any crime against public administration, crime against humanity, crime related directly or indirectly to the membership, promotion or financing of illegal groups, drug trafficking, money laundering, financing of terrorism or financing for the proliferation of weapons of mass destruction.

  (ii) Has been or is disqualified, for any cause, reason or reason, to contract with the State by the Constitution and/or laws;

- The Group will proceed to terminate in advance any type of operation or any business relationship, contractual or legal, of any order or nature, with any Counterparty, if based

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on the measures adopted and the Due Diligence process it concludes that (i) a Counterparty and/or any of its Final Beneficiaries and/or Administrators and/or parent companies and/or subsidiaries and/or affiliates, directly or indirectly, is in any of the above hypotheses or (ii) a warning signal;

- The decision to terminate any type of operation or any business relationship, contractual or legal, of any order or nature, must be made by the corresponding Board of Directors, based on the recommendations, Documents and information that the Compliance Officer and the Legal Representative provides for this purpose, recommendations, Documents and information that must consider the legal aspects, considerations and consequences of the termination;
- This decision must be duly documented.

Minimum conditions regarding contracts with all Counterparts

Without prejudice to the other contractual, commercial, corporate and labor conditions that may apply, the contracts that the Group signs with all Counterparties must include at least the following clauses, whose purpose is to protect and offer legal solutions to the Group when ML/FT/ PWMDF events occur, unless cases the Compliance Officer of each of the Group Entities authorizes an exception:

a) Grounds for termination: When the Counterparty and/or any of its Final Beneficiaries and/or Administrators and/or parent companies and/or subsidiaries and/or affiliates, directly or indirectly, is in any of the following situations:

- Finding oneself in a high-risk situation for ML/TF/FPWMD once the Enhanced Due Diligence referred to in the previous article has been carried out “Policy for knowledge, connection and contracting of Counterparts and potential Counterparts.”;
- If the Counterparty fails to comply with any of the obligations referred to above;
- If any of the representations or warranties referred to below cease to be true.

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b) Obligations of the Counterparty:

- Comply with and abide by the Group's Manual and SAGRILAFT;
- Update the information and send the Documents requested by the Group, at least once a year;
- Comply with all Policies, procedures and controls necessary to monitor and identify activities related or intended directly or indirectly with events of ML/FT/ PWMDF or illicit activities;
- Comply with all laws, rules and regulations regarding prevention and control of ML/FT/ PWMDF events;
- Take all necessary measures and Due Diligence to know all your Counterparties and the Final Beneficiaries of their Counterparties and to stay updated on them. Among the mechanisms and sources of information that the Group must use to know its potential Counterparties and their Final Beneficiaries and stay updated on its Counterparties and their Final Beneficiaries, it must always include the consultation of Binding Lists and Control Lists;
- Take, always during the term of the contract, all necessary measures to avoid incurring and to prevent any of its employees, contractors, administrators, agents, legal representatives and any other person subject to its control, from incurring, in any capacity, in any of the conduct or hypotheses referred in the Manual;
- Immediately inform the Group if any of its employees, contractors, administrators, agents, legal representatives and any other person subject to its control incurs any of the conduct or hypotheses referred in the Manual;
- Do not violate at any time laws, rules or regulations regarding ML/FT/ PWMDF.

c) Declarations and guarantees of the Counterparty:

• They have taken and will take at all times during the term of the contract, all necessary measures to avoid incurring and to prevent any of their employees, contractors, administrators, agents, legal representatives and any other person subject to its control,

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has incurred or will incur in any of the conduct or hypotheses referred to in the previous policy;

- Neither the Counterparty nor any of its partners, Shareholders, Administrators, workers, contractors, clients, suppliers, Final Beneficiaries, parent companies, subsidiaries or affiliates, has incurred in any of the conduct or hypotheses referred to in the previous policy.

7. MAIN WARNING SIGNS

7.1. Signs related to Independent and Special Counterparties (Third Parties, customers, suppliers, contractors) and/or Dependent Counterparties (Employees).

- Inconsistencies in information related to the existence, identification, home address or location of the Person;
- Inconsistencies in the information provided by the Person compared to the information provided by other sources;
- Person who refuses or avoids providing information, current or historical, related to their business, activity, origin of their resources, debts or financial capacity, at the time of carrying out an operation or transaction;
- It is not possible to verify or update the information provided by the Person;
- Person who provides unusual or incomplete documentation or uses financial terms that do not conform to common language or are identified with names very similar to those of well-known companies;
- Person who provides false, incorrect or insufficient documentation to the Group, who also refuses to provide the minimum background information required for the execution of contracts;
- Person presenting unusual or poor-quality identification documents;
- Person whose mailing address or contact information is outside the country, or who uses a PO box or picks up such correspondence directly at the Group;

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- A person whose telephone is disconnected, or whose telephone number at the time of the verification call does not match the information initially provided;
- A person whose companies have directors who do not fit the commercial profile of the company;
- Any person who pressures or attempts to pressure others not to submit the background information required to carry out a transaction or enter into a contract;
- A person who justifies the origin of funds with false documentation;
- Persons, partners, employees, or contractors of shell companies, front companies, or front organizations;
- Legal entities whose ultimate beneficial owner cannot be identified;
- Sudden change in the business behavior of a person within the Group;
- A person who is particularly concerned about the controls and supervision to which their operations or contracts must be subject;
- A person who is particularly concerned about the controls and supervision to which their operations or contracts are subject;
- Unusual characteristics of the activities carried out by the Person, their products, or places of origin;
- Attempts to violate customs, tax, or exchange regulations or procedures, or who have already been sanctioned for violations of the exchange or customs regime;
- Person or Counterparty who, at the time of their engagement or commencement of a business relationship with the Group, submits incomplete information and documentation;
- Persons who repeatedly carry out transactions on behalf of one or more third parties;
- The Person's age does not match their income;
- Person with undetermined economic activity and reluctant to specify their source of income;

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- The Counterparty has a criminal record related to ML/TF/PWMDF;
- The Counterparty is registered on a Binding List or Control List;
- Public reports indicating a high incidence of ML/TF/ PWMDF in Colombia, the region, or any other jurisdiction;
- Knowledge or suspicion that the Counterparty is engaged in an activity considered high risk in terms of ML/TF/PWMDF and/or other criminal conduct in the territory in which it is carried out;
- Knowledge that the Counterparty carries out its commercial activities in an industry considered high risk in terms of ML/TF/PWMDF and/or other criminal conduct in the territory in which it operates;
- Counterparties located in areas with a presence of narco-terrorist organizations, which suddenly register a high increase in their sales level or a sales level that does not correspond to their economic capacity;
- Establishment of companies with capital or partners from territories or countries considered non-cooperative.

7.2. Signs related to operations or transactions

- A person who, when carrying out a transaction, evades or definitively refuses to provide information regarding the purpose or origin and/or destination of the funds;
- A person who carries out high-value transactions and does not declare paid employment or a corresponding activity that justifies the amounts involved;
- A person who pressures and insists that a transaction be carried out extremely quickly, avoiding any bureaucratic procedures without justifying the reason for their urgency;
- A person who carries out transactions that are not consistent with their economic capacity and profile;
- Individuals who carry out transactions, including payments, through third parties;
- Individuals who carry out economic activities other than those specified in their

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corporate purpose;

- Individuals who, in a short period of time, appear as owners of significant new businesses and/or assets;
- Individuals who attempt to carry out transactions with counterfeit money;
- Persons who invest large amounts regardless of the associated profitability;
- Persons who refuse or suspend a transaction when asked for information regarding the origin of the funds involved or when informed that the background information will be submitted to a supervisory or regulatory entity;
- Persons who carry out transactions that do not match the type of work they supposedly perform;
- PEPs who carry out transactions that are unusual given their previous behavior;
- Individuals who carry out transactions presenting supporting documentation such as contracts, receipts, or any other document in a language other than Spanish and whose veracity cannot be verified;
- Transactions with counterparties that have not been fully identified.

8. REPORTING CHANNELS

The complaints, claims, and reports related to possible ML/TF/PWMDF events must be submitted through the reporting channels enabled for each Group Entity:

- Grupo AR y Hotel AR, https://grupoar.com.co/?page_id=1746;
- AR Construcciones, https://www.arconstrucciones.com/denuncias;
- AR Soluciones Inmobiliarias y Torre AR, https://arinmobiliaria.com.co/denuncias;
- AR Fundación, https://arfundacion.org/?page_id=4709;
- AR Capital Partners, https://www.arcapital.com.co/denuncias/.

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9. CONTACT

Each entity of The Grupo has a communication channel at its disposal. If you have any questions about our system, as appropriate, you can contact:

- Grupo AR, CanalEtico@grupoar.com.co ;
- AR Hoteles, CanalEtico@hotelesar.com ;
- AR Construcciones, CanalEtico@arconstrucciones.com ;
- AR Inmobiliaria, CanalEtico@arinmobiliaria.com.co ;
- AR Fundación, CanalEtico@arfundacion.org ;
- Torre AR, CanalEtico@torrear.com ;

10.PRIVACY

The information related to the implementation and execution of the Comprehensive Self-monitoring and Risk Management System for Money Laundering, Terrorism Financing (ML/TF) and Proliferation of Weapons of Mass Destruction Financing (PWMDF). (SAGRILAFT, in its Spanish acronym) is confidential and is in the custody of those responsible for its implementation within the company. This is a general view document for interested parties, full access to this information is limited to the competent judicial or administrative authorities, with prior authorization from the Compliance Officer.

11.VALIDITY

It is noted that the policies contained in the SAGRILAFT V. 2.0 Manual were updated for the 2025 term and take effect upon approval by the Board of Directors.

Be notified, published and enforced.

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