

Disclosure Manual
PTEE-SAGRILAF

Disclosure Manual of the Business Transparency and Ethics Program
and the Self-Control and Comprehensive Risk Management
System for Money Laundering and Terrorist Financing



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AMAZON CONSERVATION TEAM

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1. Introduction

This document corresponds to the Disclosure Manual of the Business Transparency and Ethics Program (PTEE) and the Self-Control and Risk Management System for Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (SAGRILAF).

This manual does not constitute the organization's official internal policy document; rather, it is a compilation of the main guidelines intended to facilitate awareness among strategic counterparts, such as donors, suppliers, contractors, and partners. Its purpose is to provide an overview of the principles, commitments, and controls adopted by our organization with respect to business ethics, regulatory compliance, and the prevention of risks associated with illicit activities. Through this disclosure, we seek to promote business relationships based on integrity, transparency, and compliance, thereby strengthening a culture of trust and shared responsibility.

divulgación, buscamos promover relaciones comerciales basadas en la integridad, la transparencia y el cumplimiento, fortaleciendo así una cultura de confianza y responsabilidad compartida.

2. Business Ethics and Transparency Program Compliance Policies

2.1. Code of Ethics Policy

For AMAZON CONSERVATION TEAM (ACT), acting ethically means doing the right thing at all times, applying reasonable judgment, avoiding waste, and refraining from activities that are not related to the organization's mission.

The ethical guidelines and other aspects related to this policy, given their high relevance to the organization, are set forth in a document specifically prepared for this purpose, entitled the Code of Ethics or Code of Conduct, which details the standards governing ethical behavior within the organization.

2.2. Corruption and/or Transnational Bribery (C/ST) Prevention and Management Policy

The Legal Representative of AMAZON CONSERVATION TEAM expressly states their commitment to implementing procedures aimed at identifying, detecting, preventing, and mitigating risks related to Corruption and/or Transnational Bribery (C/ST) in connection with all operations or business activities of the organization in which a national or foreign public official may be involved.

To this end, the following actions shall be undertaken:

- Ensure the allocation of the financial, logistical, human, and technological resources required by the Compliance Officer and their alternate to effectively perform their duties.
- Assume a firm commitment to preventing risks of corruption and/or transnational bribery (C/ST), enabling the organization to conduct its activities in an ethical, transparent, and honest manner.
- Establish an anonymous reporting channel allowing employees, contractors, and other third parties to report any red flags or situations related to Corruption and/or Transnational Bribery (C/ST).
- Develop policies and procedures aimed at mitigating conflicts of interest among employees, contractors, donors, and suppliers that could encourage or facilitate acts of corruption or bribery involving national or foreign public officials.
- Implement Due Diligence processes that include periodic reviews of legal, accounting, and financial aspects related to

any business or transaction, for the purpose of identifying and assessing risks of Corruption and/or Transnational Bribery (C/ST) that may affect the organization and its contractors. In the case of contractors, additional verification of creditworthiness and reputation shall be conducted.

- Execute the appropriate administrative and legal actions against managers and employees of the organization when any of them violate the provisions of the Business Transparency and Ethics Program.
- Lead an appropriate communication strategy to ensure the dissemination of compliance policies and the Business Transparency and Ethics Program among employees, contractors, donors, suppliers, and the general public.

2.3. Anti-Bribery and Anti-Corruption Policy

AMAZON CONSERVATION TEAM is fully committed to combating all forms of corruption and influence peddling in all countries in which it operates, in compliance with applicable local and international laws in all relevant jurisdictions.

AMAZON applies a zero-tolerance policy toward corruption, influence peddling, and related misconduct in all their forms. Bribery, kickbacks, and any other form of improper incentive or agreement involving public officials, donors, suppliers, or any other counterpart are strictly prohibited. This prohibition includes facilitation payments, understood as illicit and/or concealed payments intended to secure or expedite an administrative process, even if the underlying purpose is legitimate.

Acts of favoritism are also prohibited. These consist of granting a third party a benefit (e.g., employment, a supply contract for goods or services) without proven economic justification or outside the scope of the organization's social or humanitarian activities.

The promise, offer, request, payment, or acceptance of any bribe constitutes a violation of AMAZON's policy, may constitute a criminal offense, and will result in the appropriate disciplinary measures, including termination, where applicable.

2.4. Due Diligence Policy

AMAZON CONSERVATION TEAM (ACT) establishes as policy that Due Diligence shall be conducted by employees or specialized third parties, ensuring at all times that they have sufficient human and technological resources to carry out periodic reviews of legal, accounting, and financial aspects related to business dealings or transactions with counterparts classified as having a critical C/ST risk profile.

The purpose of these reviews is to identify and assess risks of Corruption and/or Transnational Bribery (C/ST) that may affect the organization, its subsidiaries, and its contractors.

Accordingly, the following guidelines have been established:

- Any registration or contracting activity with natural or legal persons involving the payment or exchange of assets in cash or in kind, under any title, shall be conducted in accordance with the provisions of the organization's PTEE Manual and SAGRILAF Manual.
- Include contractual clauses in agreements entered into with natural or legal persons as a mechanism for preventing risks of Corruption and/or Transnational Bribery (C/ST), providing legal grounds for the unilateral termination of the contractual relationship when the counterparty is formally linked by authorities to investigations related to Corruption and/or Transnational Bribery (C/ST).

2.5. Compliance Audit Policy

AMAZON CONSERVATION TEAM (ACT) shall ensure the performance of systematic, critical, and periodic reviews regarding the proper implementation of the organization's Compliance Risk Management Systems.

The Assurance Body designated by the organization shall include within its audit programs a specific verification plan addressing the processes and controls related to the prevention and control of compliance risks, in order to assess the effectiveness of each stage and component of the aforementioned systems.

The results and conclusions of such audits shall be reported to the Compliance Officer, who shall initiate the necessary corrective actions. Likewise, the relevant internal bodies shall be informed of the results of the review of the Compliance Risk Management System.

2.6. Due Diligence Policy for Acquisitions

AMAZON CONSERVATION TEAM (ACT) is committed to ensuring transparency, ethics, and integrity in all acquisitions it

carries out, including the purchase of goods and services, supplier contracting, the establishment of collaboration agreements, and any other contractual arrangements required to fulfill its mission.

The following basic principles apply:

- **Transparency:** All acquisitions shall be conducted clearly, using objective criteria and proper documentation.
- **Fair Competition:** Whenever possible, supplier selection shall be conducted through competitive processes that ensure equal opportunities.
- **Due Diligence:** ACT shall implement rigorous processes to assess the background, reputation, and regulatory compliance of counterparties.
- **Integrity:** Employees must avoid conflicts of interest and ensure that acquisition decisions are based on objective and ethical criteria.

Accordingly, due diligence processes for acquisitions shall include:

- Assessment of the reputation and background of involved counterparties.
- Review of relevant financial, legal, and operational documentation.
- Identification of relationships with third parties that may represent a risk.
- Verification of regulatory compliance, particularly in anti-corruption and anti-bribery matters.

The results of these processes shall be properly documented and shall serve as the basis for informed decision-making by ACT's senior management, ensuring responsible acquisitions aligned with the organization's principles of integrity and transparency.

2.7. Accounting Due Diligence Policy

AMAZON CONSERVATION TEAM (ACT) is required to maintain complete and accurate accounting books and records.

Expenses, liabilities, and contingencies must be fully and accurately disclosed in all corporate documentation, not only in terms of amounts, but also regarding their nature and purpose.

The creation of false or misleading records, or the acceptance of records from suppliers or third parties that do not meet the organization's requirements, is strictly prohibited.

To ensure compliance, the organization shall require its Statutory Auditor to include, within its audit programs, the verification of accounting accuracy and ensure that no transfers of money or other assets conceal direct or indirect payments related to corruption and/or transnational bribery (C/ST).

This policy applies to: all accounting and finance personnel; all accounting operations and financial records of the organization; and all suppliers, contractors, donors, and third parties that generate accounting obligations.

2.8. Policy on the Payment of Remuneration and Commissions to Contractors

When AMAZON CONSERVATION TEAM (ACT) engages contractors such as suppliers, intermediaries, agents, distributors, advisors, consultants, or other third parties involved in collaboration or risk-sharing agreements, it shall not make or promise payments other than those stipulated in the agreement and corresponding to legitimate goods or services.

In all cases, such payments must reflect fair market value for the legitimately received goods or services and may not exceed such value.

Prior to contracting, the PTEE Compliance Officer or their designated representative shall conduct due diligence to verify the suitability, creditworthiness, and reputation of the contractor, and to ensure that there are no legal or commercial impediments to interacting with national or foreign public officials on behalf of ACT.

ACT also expects contractors to comply with applicable laws and to uphold the highest ethical standards of business conduct. This policy applies to all contractors providing services to the organization, whether natural or legal persons, as well as to the finance, accounting, and any other areas involved in the management and approval of payments.

2.9. Gifts, Commissions, Loans, and Benefits Policy

AMAZON CONSERVATION TEAM (ACT) prohibits employees, suppliers, and contractors from accepting, requesting, or receiving gifts, commissions, loans, or any other benefit that could influence or appear to influence decision-making, thereby compromising the organization's integrity and transparency.

The acceptance of modest-value gifts (up to USD 100) is permitted, provided they conform to customary standards of courtesy and hospitality and do not affect impartiality or create obligations.

Any offer or receipt of benefits that may give rise to a conflict of interest must be reported immediately to the appropriate supervisory authority. Non-compliance with this policy shall be subject to investigation and possible disciplinary sanctions. This policy applies to all employees, executives, contractors, and third parties acting on behalf of or representing the organization, and to all interactions with suppliers and other relevant stakeholders.

2.10. Sponsorship Policy

AMAZON CONSERVATION TEAM (ACT) shall not sponsor events, activities, or initiatives that may compromise the organization’s integrity, reputation, or ethical principles.

Any sponsorship supported by ACT must be directly related to its mission and institutional objectives, prioritizing the public interest and conservation.

When participating in third-party sponsored events, ACT shall apply its contractor due diligence policy to ensure that sponsors meet applicable ethical and legal standards.

Invitations extended to national or foreign public officials to participate in sponsored events shall not be conditioned upon the performance, omission, or delay of any act within their official duties. Such invitations must aim to strengthen knowledge related to conservation, the environment, Indigenous rights, or other topics aligned with ACT’s mission.

All invitations must be extended in good faith, ensuring transparency and avoiding any interpretation of conflicts of interest or corruption. Sponsorships involving commitments to perform, omit, or delay acts in favor of third parties are prohibited. Sponsorships promoting illegal or unethical activities or that may damage ACT’s reputation are not permitted.

This policy applies to:

- All sponsorships granted or received by the organization.
- All areas and employees involved in sponsorship management.
- Related third parties, including beneficiaries, sponsors, and collaborators.

2.11. Donations Policy

All donations made by the organization, whether in cash, goods, or services, must serve a legitimate purpose and be intended to support social, educational, health, environmental, cultural, humanitarian, or similar projects.

Under no circumstances may donations generate undue economic benefits for the organization, its employees, or final beneficiaries, except where expressly permitted by law and duly justified and documented.

All donations must comply with applicable accounting regulations and adhere to the highest ethical and regulatory standards established by AMAZON CONSERVATION TEAM (ACT). Donations must be made in a clear, documented, and auditable manner, ensuring traceability of the resources and preventing any situation that could generate a conflict of interest.

All beneficiaries must also comply with Due Diligence and Enhanced Due Diligence procedures, as established for high-risk suppliers in the SAGRILAFT Manual.

The types of donations, along with their characteristics, established thresholds, and approval authorities, are described below.

Type of Donation	Description	Threshold and Approving Authority
Monetary Donations	These donations allow recipient organizations to use funds flexibly according to their needs.	• From 1 to 10 SMMLV - Coordinators and Directors • More than 10 SMMLV - Legal Representative
In-Kind Donations	Delivery of tangible goods, including fixed assets, technological equipment, food, clothing, medicines, among others.	• From 1 to 10 SMMLV - Coordinators and Directors • More than 10 SMMLV - Legal Representative
Product Donations	Donation of products owned or produced by the organization.	• From 1 to 10 SMMLV - Coordinators and Directors • More than 10 SMMLV - Legal Representative

Note: SMMLV stands for **Statutory Monthly Minimum Legal Wage**, as defined under Colombian law.

2.1. Political Contributions Policy

The policy of AMAZON CONSERVATION TEAM (ACT) establishes that all employees, executives, contractors, and third parties acting on behalf of or representing the organization are not authorized to make, offer, or promise political contributions of any kind—whether monetary or in kind—to political parties, candidates, campaigns, political organizations, or any activity related to politics, in the name of the Organization. This prohibition also includes donations that may be considered political contributions.

Employees may make political contributions in a personal capacity and on an individual basis. In such cases, they must bear in mind that their status as employees of AMAZON CONSERVATION TEAM (ACT) may create confusion regarding the association of their actions with the Organization. Therefore, they must take all necessary precautions to ensure that their political activism is not interpreted as official endorsement or support by AMAZON CONSERVATION TEAM (ACT).

The use of the Organization's time, resources, assets, or equipment to support personal political contributions is strictly prohibited.

Likewise, requesting reimbursement, compensation, or recognition—whether in whole or in part—from AMAZON CONSERVATION TEAM (ACT) for personal political contributions is prohibited.

2.2. Document Retention Policy

In order to ensure a higher level of cooperation with oversight and supervisory authorities, AMAZON CONSERVATION TEAM (ACT) shall retain the following documents and records related to the Business Transparency and Ethics Program for a minimum period of ten (10) years:

- Minutes evidencing the approval of the Business Transparency and Ethics Program policies, as well as the approval of any adjustments or modifications thereto.
- Guidelines or manuals containing the processes through which the approved policies and procedures of the Business Transparency and Ethics Program are implemented.
- Reports submitted by the PTEE Compliance Officer.
- Reports submitted by the Statutory Auditor regarding the operation of the Program.
- Records evidencing training provided to the Organization's personnel on the Business Transparency and Ethics Program.
- The Organization's Code of Conduct.
- Reports submitted by the PTEE Compliance Officer and the Statutory Auditor, in accordance with the applicable reporting frequency.
- Due diligence records conducted for the engagement of contractors.
- Proof of payments to suppliers and contractors, as well as records related to gifts, charitable donations, and other permitted or approved expenses.

2.3. Policy on Updates and Amendments to the Business Transparency and Ethics Program (PTEE)

The Organization establishes as policy the review and update of the Program at least once every two (2) years, taking into account the Organization's needs, new developments, and changes in the regulations issued by oversight and supervisory authorities.

All updates and amendments implemented must be properly recorded and documented. Any modifications made shall be subject to approval by the Legal Representative.

2.4. Conflict of Interest Policy

Employees of AMAZON CONSERVATION TEAM (ACT) must avoid situations in which their personal interests may interfere with their professional responsibilities.

The acceptance of gifts, commissions, loans, or benefits exceeding USD 100 (one hundred United States dollars) from third parties related to AMAZON CONSERVATION TEAM (ACT) is prohibited.

Any actual, potential, or apparent conflict of interest must be reported immediately to the direct supervisor, Regional Management, or the Administrative and Financial Subdirectorate. Violations of this policy shall be investigated and may result in disciplinary measures.

3. Report of an Unethical Event

All employees, senior executives, donors, suppliers, and/or contractors who are parties to collaboration or risk-sharing agreements with AMAZON CONSERVATION TEAM are required to promptly report, through the channels established by the Organization, any situation identified in the course of their activities that is contrary to the principles and values set forth in the Code of Conduct and the Business Transparency and Ethics Program for the prevention of risks related to Corruption and/or Transnational Bribery (C/ST). In accordance with the above, AMAZON CONSERVATION TEAM (ACT) has adopted an Irregularities Reporting (Whistleblowing) Policy, which may be consulted on its website at:

<https://www.amazonteam.org/colombia/>

and through the following link:

<https://forms.office.com/r/rYwXrScT9h>

Through this policy, the Organization declares its commitment to the highest standards of ethical practices and honest relationships, as well as to the protection of individuals who, in good faith, report cases or allegations of misconduct.

The Ethics Committee of AMAZON CONSERVATION TEAM (ACT) has adopted this policy with the purpose of encouraging employees to report, in good faith and in a retaliation-free environment, any improper conduct, so that management may appropriately address any irregular behavior.

Other Reporting Channels

Compliance Officer

Email: melissa.bedon@sermodel.com

Phone: +57 315 612 6325

3.1. Reporting of Transnational Bribery Complaints

In addition to the internal reporting channels described in the previous section of this Manual, employees, directors, donors, suppliers, and contractors of the Organization may also use the public reporting channel made available by the Superintendence of Companies (*Superintendencia de Sociedades*) to report any fact or situation related to alleged acts of transnational bribery. Reports submitted through this channel may be made anonymously. When the report is not anonymous, it shall be treated confidentially by the Authority. It is important to note that such reports may give rise to the initiation of an administrative sanctioning proceeding by the Superintendence of Companies against a legal entity or a branch of a foreign company, where sufficient grounds exist.

To report conduct related to Transnational Bribery, the following link may be used:

https://www.supersociedades.gov.co/delegatura_aec/Paginas/Canal-de-Denuncias-Soborno-Internacional.aspx

To submit a report to the Transparency Secretariat, the following link may be used:

<http://portal.paco.gov.co>



4. Dissemination and Training of the Transparency and Business Ethics Program

In accordance with the context of AMAZON CONSERVATION TEAM (ACT)'s international operations, the organization's compliance manual and related forms are available in both Spanish and English.

For permanent consultation by employees, donors, suppliers, contractors, and the general public, the Code of Conduct is published on the organization's website at <https://www.amazonteam.org/colombia/>. Likewise, the Business Transparency and Ethics Program Compliance Manual is available on the same website at <https://www.amazonteam.org/colombia/>.

As part of the disclosure strategy directed at employees, records shall be kept evidencing acknowledgment and acceptance of the Organization's general policy regarding the risk of Corruption and/or Transnational Bribery (C/ST), as well as awareness of the reporting channels implemented for this purpose.

Additionally, various employee awareness initiatives shall be carried out through the Organization's internal communication channels.

TRAINING

A general induction shall be conducted for new employees and for contractors—both direct and indirect—who perform activities on behalf of the Organization. For this purpose, a digital brochure shall be provided, as well as a physical version when applicable.

A general re-induction shall also be conducted for employees and contractors—both direct and indirect—who perform activities on behalf of the Organization, including those who carry out their duties at production or operational facilities.

Periodic annual re-induction sessions shall be conducted for employees with greater exposure to the risks managed under the PTEE.

Specific annual re-induction sessions, scheduled by the People Department, shall be conducted virtually for employees who carry out activities related to the administration, prevention, and control of Corruption and/or Transnational Bribery (C/ST) risks, at least once (1) per year.

5. Sanctioning Regime

This manual contains policies that must be observed in all transactions of the Organization and has been designed in accordance with the laws of the Republic of Colombia, in compliance with the applicable regulations issued by the Superintendence of Companies. It constitutes a formal invitation to promote and reinforce the obligation to act correctly at all times and helps ensure that the Policies are fully understood. Compliance with these Policies is mandatory for each and every employee of the Organization.

It is the responsibility of each employee of the Organization to ensure strict compliance with legal provisions and internal rules and procedures. Permissive behavior by supervisors or managers in relation to violations of rules shall not be tolerated. Employees involved in donor processes, supply management, human talent management, and internal control assurance must, in the course of their daily activities, assess the level of compliance with the Policies and provisions described herein, in order to detect deviations and report them to the PTEE Compliance Officer so that the necessary corrective actions may be taken and, where applicable, the corresponding sanctions imposed.

The application of the sanctions regime arises from the occurrence of irresponsible, permissive, negligent, inefficient, or omissive actions or attitudes in the performance of any employee that affect the Organization. Such regime consists of the application of the provisions set forth in the internal work regulations approved by the highest governing body, which are fully known to the employees.

Any sanctions and disciplinary actions imposed shall be determined on a case-by-case basis and shall depend on the severity of the violation. In all cases, management of the Organization shall be consulted for the purpose of ensuring that the measures adopted are equitable and safeguard the rights of both the employees and the Organization.

SAGRILIFT

6. Management Policy for the Prevention and Control of Money Laundering/Terrorist Financing/Proliferation of Drugs and Arms (ML/TF/FPADM) Risks

The following policies constitute the general guidelines of AMAZON CONSERVATION TEAM for strengthening the Organization's Internal Control System in relation to the management of risks associated with Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (SAGRILIFT).

6.1. SAGRILIFT Compliance Policy

The Regional Management of AMAZON CONSERVATION TEAM expresses its commitment to ensuring compliance with internal and external regulations related to the management of risks associated with Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction, allocating for this purpose the financial, human, and technological resources necessary for the proper functioning of the system. Accordingly, it shall not tolerate any conduct that, in any manner, facilitates the commission of related criminal offenses.

6.2. Due Diligence Policy

For the purpose of making sufficiently informed decisions regarding the engagement or continuation of business relationships with its counterparties, AMAZON CONSERVATION TEAM adopts as policy the implementation of adequate and sufficient measures to ensure proper knowledge of such counterparties, enabling the timely identification of red flags associated with money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction. To this end, the following measures are established: requesting documents and forms that allow for the identification of the counterparty and verification of its identity and legal and reputational suitability; in the case of legal entities, identifying their beneficial owners and related third parties, and where such identification is not possible, treating the legal representative as the beneficial owner, provided that supporting documentation evidencing the efforts made is available; applying due diligence controls using a risk-based approach, whereby higher risk entails higher levels of control, including enhanced due diligence, through the identification of counterparties with greater exposure to LA/FT/FPADM risks by segmenting factors such as corporate structure, economic activity, type of organization, jurisdiction or territory of operation, distribution channels, entities engaging in transactions involving virtual assets, and third parties identified as politically exposed persons, including foreign PEPs and PEPs of international organizations; and establishing monitoring frequency based on the counterparty's level of risk exposure.

6.3. Alert Signals Monitoring Policy

AMAZON CONSERVATION TEAM establishes as policy the continuous monitoring of counterparties, particularly those with greater exposure to LA/FT/FPADM risks. For this purpose, it shall rely on tools supported by statistical analysis that enable the detection of unusual transactions, understood as those that fall outside the parameters defined as normal. Likewise, checks against restrictive lists shall be conducted in order to identify changes in the legal or reputational status of counterparties.

6.4. Unusual Transactions Analysis and Suspicious Transaction Reporting Policy

AMAZON CONSERVATION TEAM establishes as policy the availability of sufficient communication channels and organizational structure to ensure the timely and proper analysis of all alert signals and unusual transactions identified through Due Diligence, Enhanced Due Diligence, and Alert Signals Monitoring processes. Where no reasonable justification is found for identified unusual transactions and such transactions give rise to well-founded doubts regarding the legality of the operations or the lawfulness of the counterparties' resources, a Suspicious Transaction Report (STR) shall be submitted to the Financial Information and Analysis Unit (UIAF), in accordance with applicable law.

6.5. SAGRILIFT Manual Awareness Policy

Once approved and formally adopted, the Manual of the Self-Control and Comprehensive Risk Management System for LA/FT/FPADM, AMAZON CONSERVATION TEAM shall ensure that employees joining the Organization, particularly those involved in processes where LA/FT/FPADM risk factors are identified, have permanent access to and knowledge of this Manual, as well as of Form M6-RAP-002 – Internal Report of Attempted or Unusual Transactions or Absence Reports.

6.6. Policy on Updates and Amendments to the SAGRILIFT Manual

AMAZON CONSERVATION TEAM commits to keeping its SAGRILIFT Manual up to date, ensuring that it adequately reflects the actual and potential risks to which the Organization is exposed in relation to Money Laundering, Terrorist Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (LA/FT/FPADM). The Manual shall be reviewed and updated at least once every two (2) years, or more frequently if substantial changes occur in any of the following aspects: amendments to applicable regulations issued by national or international authorities; significant changes in the Organization's operating model, including entry into new geographic markets, the incorporation of new lines of work, counterparties, or engagement channels; identification of new risk typologies or alert signals arising from the implementation of the system; and audit recommendations, reports from the Compliance Officer, or findings derived from SAGRILIFT monitoring activities.

6.7. Non-Engagement Policy

The Organization establishes as policy that it shall not enter into commercial or any other type of relationship with persons for whom there are elements or circumstances giving rise to well-founded doubts regarding the legality of their operations or the lawfulness of their resources. This applies to both natural and legal persons, as well as their related third parties, including legal representatives, members of the board of directors, beneficial owners, shareholders, partners, or associates holding five percent (5%) or more of the share capital, contribution, or participation. Accordingly, if such elements are identified during due diligence or enhanced due diligence processes, the counterparty shall not be engaged. Where such identification occurs during monitoring processes, the relationship shall be terminated.

Made by:

Compliance Officer

Approved by:

Legal Representative