



HOTELES  
BOGOTÁ PLAZA

# SAGRILIFT – PTEE COMPLIANCE



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SAGRILIFT



# SAGRILAFT

## PURPOSE

This manual defines the guidelines for the Self-Control and Risk Management System (SAGRILAFT) to prevent, identify, report, and mitigate risks related to money laundering, terrorism financing, and the proliferation of weapons of mass destruction. To achieve this, it establishes roles and responsibilities, due diligence procedures, transaction monitoring mechanisms, and training plans that strengthen the culture of self-regulation and compliance within the company.

## SCOPE

This document is intended for all employees, shareholders, members of the board of directors, clients, suppliers, contractors, strategic partners, and other third parties, especially those involved in the execution of commercial, contractual, and legal transactions. Its purpose is to prevent the company from being used as a means to launder assets, finance terrorism, or support the proliferation of weapons of mass destruction.

## SYSTEM AUDIT AND MONITORING

In accordance with Article 5.1.2, Chapter X of the CBJ issued by the Superintendency of Companies, a compliance officer has been appointed. This officer is responsible for maintaining, auditing, and verifying the system.

## COMPLIANCE POLICY

HOTELES BOGOTÁ PLAZA S.A. has implemented a risk management system to prevent crimes related to Money Laundering, Terrorism Financing, and the Proliferation of Weapons of Mass Destruction (LA/FT/FPADM) through policies, controls, and technological tools.

The main guidelines are:

- Prioritizing compliance with internal and national regulations on SAGRILAFT.
- HBP reserves the right to restrict relationships with third parties who have a criminal record or appear on restrictive lists.
- Updating third-party information annually.
- Making efforts to identify the ultimate beneficiaries of companies with which we establish a relationship.
- Declaring our commitment to cooperating with the state in preventing LA/FT/FPADM.

## DIVULGACIÓN Y CAPACITACIÓN

The SAGRILAFT guidelines must be communicated through the organization's website, email, training sessions, or any other appropriate means.

Annual in-person training is mandatory for process leaders exposed to LA/FT/FPADM risks and designated key personnel.

Main topics:

- Policies, legislation, and procedures for preventing LA/FT/FPADM.
- Responsibilities and risks in processes, business operations, and products.
- Due diligence and reporting channels.



# MECHANISMS FOR COMPLYING WITH SAGRILAFT POLICIES

## SYSTEM RESPONSIBLE PARTIES



- ★ **Strategic Level:** Responsible for defining resources, establishing policies, and appointing the Compliance Officer. This level holds the highest authority and accountability in managing the system.
- ★ **Tactical Level:** Responsible for defining the strategies for system development. This includes managing resources for implementation, correction, and maintenance, as well as conducting continuous auditing and monitoring.
- ★ **Operational Level:** Supported by the Compliance Officer, this level executes the action plans established for risk management. It is responsible for verification and reporting.

## DUE DILIGENCE

Due diligence is an ongoing process through which HOTELES BOGOTÁ PLAZA S.A. seeks to identify, assess, mitigate, prevent, and report risks related to money laundering, terrorist financing, and the proliferation of weapons of mass destruction (ML/TF/PWMD). Its implementation allows the company to manage both actual and potential negative impacts on operations, supply chains, and business relationships, integrating risk management into decision-making.

This process is carried out through procedures such as counterpart due diligence, verification of ultimate beneficiaries, cash handling, and transaction monitoring, demonstrating that, as a company, we exhaust all available means to manage these risks.

## COUNTERPARTY DUE DILIGENCE

This process involves identifying all individuals and entities linked to HOTELES BOGOTÁ PLAZA S.A., including shareholders, clients, suppliers, and employees. Their identity is verified through the required documentation, the purpose of the business relationship is clarified, potential red flags are observed, and checks are conducted against restrictive lists and databases.

HOTELES BOGOTÁ PLAZA S.A. refrains from engaging with any third party without verifying their commercial, legal, and identification information, ensuring they can be screened against restrictive lists. The company considers the following factors:

- Information updates
- Risk assessment
- Communication of results
- Information security
- Identification of ultimate beneficiaries

## ENHANCED DUE DILIGENCE

These procedures apply to:

1. Counterparties classified as high-risk by the company.
2. Politically Exposed Persons (PEPs).
3. Individuals or entities located in high-risk jurisdictions.
4. Those operating with virtual assets.

Due Diligence Measures:

- Identification and verification of the legal representative, shareholding structure, and ultimate beneficiaries.
- Understanding the economic activity and source of funds.
- Analysis of financial figures, including income and expenses, for reasonableness.
- Alignment of transactions with the economic activity and financial profile.
- Review of international operations and geographic areas where the legal entity operates.
- Certification of an anti-money laundering and counter-terrorism financing system, if applicable.
- For nonprofit organizations: Evaluation of objectives, scope, structure, and background.

## REPORTING OF TRANSACTIONS

Unusual transactions are those that do not align with the client's or third party's profile in terms of amount, frequency, or characteristics.

Suspicious transactions are unusual transactions without a reasonable justification. These may involve atypical wealth increases, identity misuse, falsified documents, shell companies, or links to illicit activities.

Reports:

- **Internal:** Any employee must report suspicious or unusual situations in writing, with supporting documentation, to the Compliance Officer.

- **External:** If suspicion is confirmed, a report is submitted to the UIAF through SIREL as a Suspicious Transaction Report (ROS). Additionally, a quarterly report on the absence of suspicious transactions (AROS) is also submitted to the UIAF.

## IDENTIFICATION OF ALERTS

- Unjustified increase in assets.
- Misuse of identities or falsified data.
- Acting on behalf of third parties or shell companies.
- Links to criminal activities or illicit assets.
- Structuring cash transactions to evade detection.

## CASH HANDLING

In compliance with Article 5.3.11 of Chapter X of the CBJ of the Superintendency of Companies and in response to the money laundering risk associated with cash transactions, the following measures are established:

- All cash transactions must have an invoice or supporting document.
- Cash payments equal to or exceeding **\$10.000.000** must be authorized by the Compliance Officer and Management.
- Customers making payments over **\$10.000.000** must sign a declaration of the source of funds.







# PTEE



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# PTEE

## PURPOSE

The Transparency and Business Ethics Program of HOTELES BOGOTÁ PLAZA S.A. reaffirms the company's and its executives' commitment to ethics and transparency, ensuring responsible business management with zero tolerance for any acts that violate its principles. Its objective is to establish high ethical standards and manage corruption and transnational bribery (C/ST) risks through a risk management methodology, aiming to mitigate operational, legal, and reputational risks.

## SCOPE

The Transparency and Business Ethics Program applies to all related parties and stakeholders, including the human team, clients, suppliers, contractors, shareholders, board members, employees, investors, and, in general, any entity or individual with whom HOTELES BOGOTÁ PLAZA S.A. establishes a direct or indirect commercial, contractual, or cooperative relationship.

## AUDIT AND SYSTEM MONITORING

In accordance with Article 5.1.2, Chapter XIII of the CBJ issued by the Superintendency of Companies, a Compliance Officer has been appointed to oversee the maintenance, auditing, and verification of the program.

## PTEE COMPLIANCE POLICY

HOTELES BOGOTÁ PLAZA S.A. reaffirms its commitment to transparency and compliance with international standards by adopting the Corporate Transparency and Ethics Program (PTEE).

The company implements controls and mechanisms to manage corruption and transnational bribery (C/ST) risks and to foster an ethical and transparent corporate culture through the following key principles:

- Relationships with counterparties are governed by the principles of good faith, fairness, and transparency.
- Illicit conduct, including bribery and corruption, is strictly prohibited.
- The entire supply chain must comply with and promote PTEE policies.
- Reporting any suspicious activity to the Compliance Officer is mandatory.
- Enhanced due diligence will be applied to counterparties classified as Politically Exposed Persons (PEPs).
- Ethics and regulatory compliance take precedence over any corporate objective.



# PTEE COMPLIANCE MECHANISMS

## PROGRAM COMPONENTS

- **Organizational Culture:** Rooted in legality, transparency, and ethics, ensuring all team members adhere to common guidelines.
- **Promotion of Transparency:** Secure reporting channels to uphold ethical duties and loyalty to the company, the State, and third parties.
- **Information Protection:** Confidentiality in managing C/ST risks, except when disclosure is authorized by senior management or required by law.
- **Collaboration with the State:** Prompt response to judicial authorities and use of official channels to report bribery, corruption, and suspicious transactions.
- **Documentation and Control:** Mandatory recordkeeping for business transactions and contracts, with a retention period of ten years.

## REGULATION AND DUE DILIGENCE

Through its Business Transparency and Ethics Program (PTEE), HOTELES BOGOTÁ PLAZA S.A. regulates the giving and receiving of gifts, payments, commissions, travel expenses, donations, and the management of conflicts of interest through the following measures:

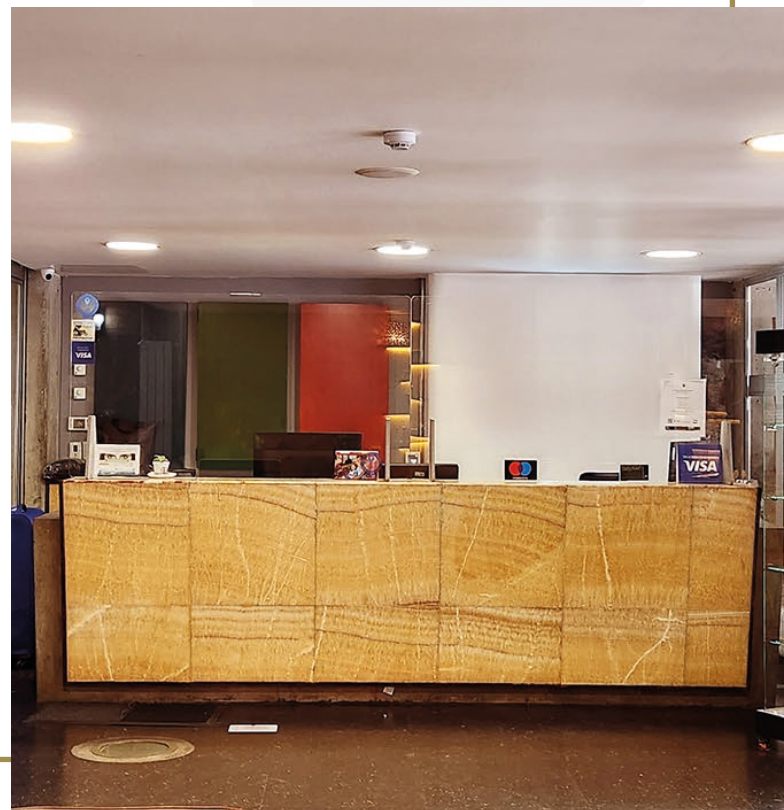
- **Accounting Department:** oversees travel expenses and donations in accordance with established procedures.
- **Human Resources:** manages conflict-of-interest declarations and regulates the acceptance of gifts.
- **Marketing and Sales:** determines which courtesies, goods, or benefits may be offered to clients.
- **General Management:** ensures commissions are granted in compliance with established guidelines.

## CODE OF ETHICS

The HBP Code of Ethics, based on current regulations, serves as a guide for employees and third parties, establishing clear principles of ethical conduct to uphold the company's integrity and reputation. Compliance is the responsibility of all members, who must promote transparency and lead by example. Its core values include ethics and trust in relationships, efficiency in management, and excellence in service, ensuring sustainable growth.

## DISCLOSURE AND TRAINING

The Transparency and Business Ethics Program, along with its components and methodologies, must be communicated through the organization's website, email, electronic media, or any other appropriate channel. This dissemination should include all stakeholders, including clients, suppliers, and business partners. Annual in-person training will be mandatory for leaders of processes sensitive to C/ST risks and key designated personnel.





# POLICIES

## INTENSIFIED DUE DILIGENCE

### Conflict of Interest

This policy is managed by General Management and Human Resources and establishes that:

- Conflicts must be reported to Human Talent using the designated declaration form.
- Those involved must refrain from making decisions, accessing information, or engaging in related transactions.
- If the conflict is unavoidable, transparent management measures will be implemented.

Potential conflicts of interest include:

- Working for, investing in, or advising a competitor.
- Conducting personal business with clients or suppliers.
- Having family members or close friends within the company, among suppliers, or clients.
- Accepting gifts, incentives, or undue favors.
- Using company information or resources for personal gain.
- Influencing benefit allocations within the organization.

Provisions in Case of Conflict:

- Information is handled confidentially and must be disclosed to the Human Talent department.
- Cases related to ML/TF/FPADM or C/ST must be reported to the Compliance Officer.
- Failure to report or providing false information is considered a serious violation.
- A gifts and hospitality policy is in place to prevent such conflicts.

## GIFTS AND COURTESIES

### Requests and Acceptance

- No gifts, tips, or undue benefits may be requested on behalf of oneself, the hotel, or its executives.
- Personal gifts exceeding \$150,000, or those that could create influence or a conflict of interest, will not be accepted.
- Cash or in-kind tips are not accepted, except for voluntary gratuities given by guests.

### Prohibitions

- Payments, promises, or benefits may not be offered to public officials or third parties to influence decisions.
- Unauthorized discounts not approved by management are not permitted.
- Invitations of a personal or relational nature within the premises require prior authorization.

### Delivery and Regulation

- Gifts or courtesies provided must not exceed \$350,000 without management approval.
- The cost of courtesies must be appropriate to the nature of the event.

### Reporting

- Any attempt at bribery, whether internal or external, must be reported through the anonymous whistleblowing hotline.

# POLICIES

## DONATIONS

- Donations must align with the company's mission, vision, and values.
- Donations will not be made to entities, individuals, or institutions linked to crimes such as money laundering, corruption, or bribery. Nor will they be given to political groups or social movements with political affiliations.
- Donations must comply with Colombian legal regulations and any applicable tax benefits.
- All beneficiaries must provide documentation and authorization for the processing of personal data to be verified against restricted lists.
- The Shareholders' Assembly must approve donations in cash or in-kind exceeding \$50.000.000 or involving real estate assets.
- The General Manager will authorize donations in cash, in-kind, or services within the limits set by the Board of Directors.
- All donations will be documented in meeting minutes and, when applicable, through a notarized public deed.
- The recipient and the purpose of each donation must be recorded in writing.
- No donations will be made without written authorization from the General Manager.
- Assets such as computers, appliances, or furniture may be donated with written authorization from the General Manager and an official release record.

## GIFTS AND HOSPITALITY

- Commissions will be adjusted according to market conditions and the dynamics of the hospitality industry.



- The Sales and Accounting departments will analyze key performance indicators and targets to present proposals to General Management. Commissions will be granted to B2B and B2C agencies, as well as OTAs, after verifying factors such as commission percentage, market positioning, and room nights sold.
- Commissions must be supported by contracts, commercial agreements, and annexes, with periodic reviews. Commissions will only be granted under formally accepted agreements within the hospitality and tourism sector. The General Management and/or Board of Directors will determine the applicable commission percentages.
- No commissions will be granted to Politically Exposed Persons (PEPs) or individuals involved in public tenders in which the company participates. Verification mechanisms, including restricted lists and databases, will be implemented.
- General Management and audit mechanisms will periodically review compliance with this policy to ensure its alignment with the Business Ethics and Transparency Program.





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