

Manual of the prevention of Money Laundering



MINUTES OF APPROVAL OF THE ANTI-MONEY LAUNDERING PREVENTION MANUAL

This manual, as well as the general policies for the control and prevention of money laundering and the procedures for knowing the client, were approved and adopted by the Board of Directors of **CONSTRUCTORA CONCRETO S.A.**, in its meeting of February 2, 2006, as stated in minute No. 488.

HISTORY OF CONSTRUCTORA CONCRETO S.A.

The commercial company **CONSTRUCTORA CONCRETO S.A.**, was incorporated by Public Deed Number 8.597 of December 26, 1961, granted in the 4th Notary Office of the Circle of Medellin, with Nit. 890.901.110-8 and main domicile in the Municipality of Medellin, Department of Antioquia, located its administrative headquarters at Carrera 43 a No. 18 Sur 135 Piso 4 Edificio Sao Paulo, registered in the Chamber of Commerce of Medellin for Antioquia and with a legally established branch in the city of Bogota D.C..

SIPLA POLICIES

1. GENERAL POLICIES

- ✓ **CONSTRUCTORA CONCRETO S.A.** must adopt a money laundering control and prevention system in accordance with its corporate purpose.
- ✓ The company must design and implement training programs aimed at all employees, in order to instruct them in compliance with the control standards for the prevention of money laundering.
- ✓ All company employees must comply with the regulations issued on the control and prevention of money laundering, as well as protect their national and international image and reputation and collaborate with the authorities in the control of laundering of proceeds from illicit activities and terrorist activity.
- ✓ The procedures and actions related to SIPLA shall be governed by the established rules and the circulars issued by the Financial Superintendency of Colombia.
- ✓ Ethical principles must take precedence over the achievement of business goals; therefore, a culture must be created to apply the standards and procedures established for the prevention of money laundering.

- ✓ The company **CONSTRUCTORA CONCRETETO S.A.**, will have an organizational structure for the control and prevention of money laundering, for which the administration will provide all its support and will assign the necessary human and technological resources to meet the objectives.

2. SPECIFIC POLICIES

- ✓ **CONSTRUCTORA CONCRETETO S.A.** will put the observance of ethical principles before the achievement of commercial goals, generating a culture of prevention of money laundering risk through the stock market.
- ✓ Natural or legal persons who have or have had any link with illegal operations or activities according to the report published by the authorized entity are not a target market for the company.
- ✓ The company will design efficient processes for the adequate knowledge of natural or legal persons aspiring to become partners, always taking into account the requirements for the control and prevention of money laundering.
- ✓ The Company will develop efficient processes for the confirmation of the information provided by the natural or legal persons that are part of the process of linking as partners, in order to verify the validity of the information and obtain a control in the prevention of money laundering.
- ✓ The company shall communicate to its members the importance of updating the information provided by them at least once a year.

3. OBJECTIVES

1. To prevent issuers of securities from being used as instruments for the concealment, management, investment or use, in any form, of money or other assets derived from the illicit activities mentioned in Article 323 of the Penal Code, or to give the appearance of legality to such activities or to the transactions and funds related thereto.
2. The purpose of this manual is to compile the procedures to be taken into account by **CONSTRUCTORA CONCRETETO S.A.**, to detect unusual or suspicious operations tending to serve as an instrument for the concealment, handling, investment or use in any form, of money or goods coming from illicit activities (art. 247 A of the Penal Code).
3. To establish the rules that make up the minimum requirements that **CONSTRUCTORA CONCRETETO S.A.**, as a securities issuer, must comply with in the design and implementation of its own systems for the prevention and control of money laundering through the securities market.

4. SCOPE

This manual sets forth the standards, instructions and parameters to be taken into account for the management of the integral systems for the prevention of money laundering and guides the Company in the procedures to be followed in those events in which, according to its internal controls, operations that may be considered suspicious are detected.

The rules on the control and prevention of money laundering enhance the confidence of our customers by the strict compliance that the company gives to the control aspects.

The rules and procedures contained in this document must be complied with by all employees and departments of the company **CONSTRUCTORA CONCRETO S.A.**

5. CONTENTS OF THE MONEY LAUNDERING PREVENTION MANUAL

The manual for the prevention of money laundering must be approved by the Board of Directors of **CONSTRUCTORA CONCRETO S.A.**, it shall clearly establish the procedures for the execution of the different prevention and control mechanisms to be adopted and shall contain at least the following aspects:

- a) Description of the procedures for investor awareness and confirmation of information, indicating the levels or positions responsible for its execution.
- b) The functions, responsibilities and powers of the administrators and other officers of the entity in charge of compliance with the legal and internal regulations on prevention and control of money laundering.
- c) The criteria and procedures necessary to prevent and resolve conflicts of interest that may arise in the development of its purpose and, in particular, in the detection and analysis of unusual transactions and the determination and reporting of suspicious transactions.
- d) Level of hierarchy, functions and level of responsibility of the compliance officer in relation to the entity's SIPLA.
- e) Document retention policies and procedures.
- f) The process to be followed to respond to requests for information from competent authorities.

- g) Methodologies, criteria and warning signs for analyzing and evaluating information to detect unusual and suspicious operations tending to money laundering, and the detection of conduct related to terrorist activities and their possible financing, as well as the procedure for reporting them.
- h) Development of the other elements that the entity has to protect itself from money laundering.

The Manual for the Prevention of Money Laundering must be known and there must be written evidence of its reception and reading by, at least, the issuer's administrators, the persons involved in the direct placement of securities and those responsible for the registration of transfers in the secondary market or payment of yields to investors.

Any modification to the mechanisms adopted in the Manual for the Prevention of Money Laundering must be reported to the Superintendency of Securities within the month following its approval. The manuals must be updated and remain at the disposal of this Superintendency, which may request a copy of the same when it deems it pertinent.

6. DESCRIPTION FROM THE PROCEDURES FOR ACKNOWLEDGEMENT OF INVESTORS

6.1 INVESTORS IN THE PRIMARY MARKET

- a) The Company will establish a prospectus for the placement and notice of offering of the securities.
- b) Individuals or legal entities that intend to make investments in the Company must fill out, prior to the time of their acceptance, the forms established by the Financial Superintendency of Colombia (see Annex No. 1).
- c) In the case of natural persons, the following documents must be attached to the information requested in Annex 1:
 - Photocopy of identification document;
 - Proof of income (fees, certificate of income and withholdings or the corresponding document.
 - Nature of the economic activity performed
 - Origin of funds to be used for the investment certified by the statutory auditor or public accountant.
 - Income tax return for the last available taxable period.
 - Certified or audited financial statements as of the latest available cut-off date at the time of linkage, when applicable.

- d) In the case of legal entities, the following documents shall be attached to the form for investor engagement, contained in Annex 1:
- Certificate of existence and legal representation not older than three months, issued by the Chamber of Commerce or similar document.
 - Photocopy of the tax identification number NIT.
 - Photocopy of the identity document of the Legal Representative.
 - Certified or audited financial statements.
 - List of partners holding 5% or more of the capital stock, if this information is not included in the Certificate of Existence and Legal Representation. In the case of non-corporate entities, a list of the members of the board of directors or the body acting in its stead shall be attached, in case they are not included in the certificate of existence and representation.
 - Income tax return for the last available taxable period.
- e) In the case of investors who are economically dependent on a third party, the aforementioned documentation must be requested, depending on the type of person, from the third party from whom the resources to be used for the transactions originate.
- f) If the securities are placed through an auction, the shareholder binding form may be submitted prior to the scheduled time of the auction.
- g) The interested party who does not timely submit the completed linking form in its entirety and, therefore, it is not possible to verify the information, will not be able to participate in the awarding, within the terms indicated in Circular 0010/August/05.
- h) The Company shall confirm the information contained in the form filled out by each new shareholder. When the information cannot be verified, or is inaccurate or false, such fact shall be considered as a warning signal and the company may desist from continuing with the admission process.

6.2 EXCEPTIONS TO THE OBLIGATION TO FILL OUT THE INVESTOR ENGAGEMENT FORM.

The requirements set forth in paragraphs c) and d) of section 5.1 shall not apply to the following investors:

- a) To issuers of securities or entities registered in the National Registry of Securities and Intermediaries.
- b) Entities supervised by the Banking Superintendency.

- c) Multilateral Organizations.
- d) Public entities of the national, departmental or municipal order, except in the case of industrial and commercial companies of the State, public capital companies or mixed economy companies that are not supervised by the Banking Superintendency.

6.3 INVESTORS IN THE SECONDARY MARKET

When the Company requires the issuance of nominative securities, as issuer, before proceeding to register the respective sale in the corresponding registry book, it shall request the completion of the form for shareholders' engagement, and shall previously carry out the steps to confirm the data provided.

7. PROCEDURE FOR THE SALE AND PURCHASE OF SHARES

7.1 SALE THROUGH COMMISSION AGENT

- a) Whoever intends to sell the shares held by **CONSTRUCTORA CONCRETO S.A.** to third parties through a stockbroker, as the selling bidder, must endorse the title, send a letter of transfer with all the information and fill out the form provided by the stockbroker with all the information as the seller.
- b) Whoever intends to purchase the shares, shall go to the stockbroker to express his intention to purchase shares of the Company, and shall also fill out the form provided for in the rules for the purchaser.
- c) The price of the shares of **CONSTRUCTORA CONCRETO S.A.** is determined by supply and demand.

7.2 DIRECT SALE OF SHARES

- a) The shareholder of **CONSTRUCTORA CONCRETO S.A.**, as seller, together with the buyer, go to the stockbroker to carry out the commercial operation, as long as the transaction does not exceed 10% of the outstanding shares.
- b) The Company's shareholders may also sell their shares directly, without the intermediation of a stockbroker, but both parties, seller and buyer, are obliged to fill out the forms for the sale of their shares.

the sale, without the transaction exceeding the total value established as a limit by law.

- c) The corporation shall not register the transfer of shares nor shall it pay yields on them when the investor has not submitted to the entity the duly filled out affiliation form and all the attachments required in paragraphs c) and d) of section 5.1.

8. PARTICIPANTS IN THE DEFINITION, MANAGEMENT AND IMPLEMENTATION OF THE INTEGRATED MONEY LAUNDERING SYSTEM

The Company's directors, aware of the importance for the company to exercise control over its assets in order to prevent **CONSTRUCTORA CONCRETO S.A.** from being used to hide, manage, invest or take advantage in any way of money or other assets derived from the illicit activities mentioned in article 323 of the Penal Code, or to give the appearance of legality to these activities or to the transactions and funds related to them, have determined to form the following administrative entities as participants for their control:

- ◆ The Board of Directors
- ◆ The Administration - Presidency
- ◆ The Compliance Officer
- ◆ The Statutory Auditor

9. COMPANY PERSONNEL RESPONSIBLE FOR MONEY LAUNDERING CONTROL AND SECURITIES ISSUES

The following personnel are responsible for the control of the acts related to the issuance of securities to **CONSTRUCTORA CONCRETO S.A.**:

9.1 THE BOARD OF

DIRECTORS

FUNCTIONS:

- a) Point out the policies for the prevention and laundering of assets.
- b) Approve the manual for the prevention of money laundering and its updates.
- c) Approve the mechanisms and instruments that make up the Integral System for the Prevention of Money Laundering SIPLA.
- d) Appoint the Compliance Officer and his or her respective alternate

- e) Approve the technological, human and physical resources required by the Compliance Officer for the performance of his/her duties.
- f) Review and analyze the reports presented by the Compliance Officer at the Board of Directors' meetings.
- g) Evaluate at least once a year the operation of the SIPLA and compliance with the plan approved for the adequate prevention and control of money laundering.

9.2 THE ADMINISTRATION: The President of the Company, as the highest authority, is in charge of the following functions:

FUNCTIONS:

- a) Comply with the policies and instructions established by the Board of Directors regarding prevention and control of money laundering.
- b) Provide the Compliance Officer with the technological, human and physical resources approved by the Board of Directors.
- c) Ensure that the Company's operating manuals establish the requirements and procedures necessary for the proper functioning of the Manual for the Prevention of Money Laundering.
- d) To comply with the requirements or recommendations made by the Compliance Officer for the proper fulfillment of its functions.

9.3 COMPLIANCE OFFICER: This is an appointment of high hierarchical level and decision-making capacity, which does not require exclusive dedication. He/she will be appointed by the organization's board of directors, with an alternate who will replace him/her in his/her temporary or definitive absence while a new Officer is appointed.

CONSTRUCTORA CONCRETO S.A. shall notify the Superintendence of Finance and the UIAF of the Attorney General's Office within fifteen days of its designation, sending a copy of the respective minutes and a copy of the communication in which it accepts and promises to comply with the functions assigned in this manual.

FUNCTIONS

- a) Monitor compliance with all aspects related to the Law, Circular 0010 of August 5, 2005 of the Superintendency of Securities, and those determined by the company itself for money laundering.

- b) Ensure the proper functioning within the entity of all the mechanisms and specific instruments that make up the SIPLA and implement and develop general and specific procedures for the different departments of the entity, with special emphasis on the areas with the highest risk of money laundering.
- c) Carry out the following internal and external reports to ensure the operation of its own risk control procedures, as well as compliance with the legal duty to collaborate with the authorities in charge of the fight against money laundering. The fundamental ones for the system are:

-Internal Reporting of Unusual Transactions: The Company shall provide procedures for each officer responsible for the detection of unusual transactions, the officer shall also indicate the reasons for the qualification in the report to the area in charge of analyzing them.

-Internal Reporting of Suspicious Transactions: Provision should be made for immediate and written reporting procedures to the competent official or body.

- External Suspicious Transactions Report (STR): Determines the suspicious transaction, including those that were not carried out but were attempted to be carried out for immediate and direct reporting to the UIAF in accordance with the instructions issued by this Superintendency, according to Annex I. For the purposes of the STR, it is not required that the company is certain that it is an illicit activity, nor is it necessary to identify the type of crime or that the resources it manages come from an illicit activity. It is only required that the activity is suspicious. Since the STR does not correspond to a criminal complaint, it does not have to be signed. The UIAF will reject reports that do not comply with the minimum requirements.

- Cash Transaction Report: Once the placement period of the securities issued has ended, the company must submit to the UIAF the report on cash transactions in accordance with paragraph 2.2.5.1 of Circular 0010 of August 5, 2005 of the Superintendency of Securities, by filling out the form provided in Annex II.

- d) To prepare the forms for shareholder engagement in compliance with the provisions of the external circular issued by the Superintendence of Securities No. 0010 of August 5, 2005, now Superintendence of Finance of Colombia.
- e) Maintain updated records of shareholders and investors.
- f) Keep stock issues up to date

- g) Report to the hierarchical superior any anomaly detected in the compliance with this money laundering prevention manual, so that the pertinent corrective measures may be adopted.
- h) Create a file of evidence and documentary support of the programs, tests, reviews, inspections, analyses and reports of work performed.
- i) Make internal reports on a) unusual transactions, b) suspicious transactions, and c) cash transactions.
- j) Submit to the Board of Directors or whoever represents it the: a) Requirements of technological, physical and human resources necessary for the fulfillment of its functions, b) Periodic reports on the placement of shares in the primary market, c) The periodic reports on the placement of shares in the primary market, d) The information required for the performance of the functions of the Board of Directors, e) The information required for the performance of its functions.
- k) Submit the annual report on the control of money laundering carried out on transfers made in the secondary market.
- l) To attend and coordinate any requirement, request or diligence of judicial or administrative authorities in matters of prevention and control of criminal activities.

9.4 The **Statutory** Auditor is responsible for ensuring that the Company's actions are in compliance with legal regulations and for implementing controls to detect non-compliance with the instructions given for the prevention of money laundering.

FUNCTIONS

- a) To ensure that the operations entered into are in accordance with the provisions of the bylaws, Circular 0010 of August 5, 2005 of the Superintendency of Securities, the decisions of the General Assembly and the Board of Directors of the Company and to report to the highest governing bodies of **CONSTRUCTORA CONCRETO S.A.**
- b) Implement adequate controls to detect non-compliance with the instructions for the prevention of money laundering set forth in Circular 0010 of August 5, 2005 of the Superintendency of Securities.
- c) To carry out the review of the functions performed by the administrators and the Compliance Officer in relation to the respective SIPLA.
- d) Within the report to be submitted to the General Meeting, the highest corporate body of the Company **CONSTRUCTORA CONCRETO S.A.**, in accordance with the provisions of numeral 3 of Article 209 of the Code of Commerce, the Statutory Auditor shall

The Prosecutor or the body acting in its stead shall express the conclusions in the process of evaluation of compliance with the rules on prevention and money laundering.

- e) In general, he/she shall report in writing to the Assembly, or to the Board of Directors, or to the President of the Company, as the case may be, any irregularities occurring in the operation of the corporation and in the development of its business.
- f) Collaborate with the governmental entities that inspect and supervise the company and provide them with the reports required or requested.
- g) To ensure that the accounting records of the corporation and the minutes of the meetings of the Assembly and the Board of Directors are regularly kept, and that the correspondence of the corporation and the vouchers of the accounts are duly preserved, giving the necessary instructions for such purposes.
- h) Assiduously inspect the Company's assets and ensure that timely measures are taken for the conservation or security of the same and of those held in custody in any other capacity.
- i) To give instructions, carry out inspections and request reports as may be necessary to establish permanent control over the Company's corporate values.
- j) Authorize with his signature any balance sheet to be drawn up, with its corresponding opinion or report.

10. CRITERIA AND PROCEDURES FOR PREVENTING AND RESOLVING CONFLICTS IN THE DETECTION AND ANALYSIS OF UNUSUAL TRANSACTIONS AND SUSPICIOUS TRANSACTION REPORTS

- a) **CONSTRUCTORA CONCRETO S.A.** has the obligation to clearly know the economic activity developed by its shareholders, as well as the characteristics of the operations in which they are involved. For this purpose, **CONSTRUCTORA CONCRETO S.A.** shall design a form that the future investor shall submit with its respective annexes and that shall be submitted before the scheduled time of the auction for the awarding of shares. The information to be requested shall be the following:
 - Complete identification of the member,
 - usual economic activity.
 - Characteristics of the sources of income and characteristics of the activities to which the funds are destined, both accompanied by certifications from the Statutory Auditor's Office or the Public Accountant.

- Sworn statement of the investor describing the origin of the funds destined to the acquisition of the shares and the material evidence he/she has to support his/her statement.
- When the Investor acquires such capacity through an interposed person such as a Guardian or a Curator, the required information must be provided for both, and the analysis must include the identity and activities of the guardian or Curator who will also be the one to submit the sworn statement of the ward and the Investor's own sworn statement with the supporting documents already announced.
- When the investor is a legal entity, **CONSTRUCTORA CONCRETO S.A.** will make a study of its shareholding structure and an analysis of the investors' identity, economic activity, characteristics of the source and application of funds. This information must be corroborated with entities such as the Financial Superintendence, the DIAN and the companies that the investor lists in its report. When the information cannot be verified, it should be considered as a warning signal.

The interested party that has not submitted the requested information and its annexes in a timely manner may not participate in the award process.

When the services of a financial intermediary are used to carry out the sale of the shares, it shall be the latter who is obliged to collect and analyze such documentation, which shall be recorded in the shareholder's book. A copy of the information collected shall be kept in **CONSTRUCTORA CONCRETO S.A.**'s files.

- b) It shall be established whether the frequency, volume and characteristics of the transactions executed in the securities market are related to the economic activity of the same,
- c) THE COMPLIANCE OFFICER will compile the information concerning the above points, prepare a report to be submitted to **CONSTRUCTORA CONCRETO S.A.**'s COMMITTEE FOR THE PREVENTION OF ASSETS LAUNDERING. **S.A.**, where the reasonableness of the financial movements made by the new shareholders of **CONSTRUCTORA CONCRETO S.A.** will be evaluated with historical criteria, and will request that the transfers not be registered and the yields not be paid to those investors who have not provided the connection forms duly filled out with all the required attachments.

If the securities are dematerialized, **CONSTRUCTORA CONCRETO S.A.** shall not be obliged to carry out the control of money laundering referred to in this numeral, since in this case such control shall be carried out by the direct depositor entity that has been in charge of reporting the transfer to the centralized securities depository management company.

CONSTRUCTORA CONCRETO S.A., as issuer of shares registered in the National Registry of Securities and Intermediaries must maintain and update the information indicated in Letters a) and b) of this manual with respect to shareholders who own one percent (1%) or more of its outstanding shares, for which purpose they must send the linkage form to the last registered address of the Investor, at least once a year.

- d) When the COMMITTEE considers it pertinent, taking into account the frequency and amount of the operations carried out by shareholders whose activity is not clear for the business being developed, it shall order the transfer of the same report with the complete identification, the activity they develop and the historical behavior of the movements carried out by the questioned shareholders, to the SPECIAL ADMINISTRATIVE UNIT FOR INFORMATION AND FINANCIAL ANALYSIS -UIAF. The reports shall be sent to the Attorney General's Office of the Nation or to the Special Judicial Police Corps designated by it, for which purpose Annexes I and II of this manual shall be used to consider the convenience of deepening the investigation on money laundering with transactions of its users that due to their particular characteristics may lead to the suspicion that they are using the Company to transfer, manage, use or invest money or resources coming from illicit activities. The mandatory reports and the way to carry them out, as well as the annexes that must be used for such purpose, may be consulted in the web page of the Attorney General's Office: www.uiaf.gov.co.
- e) When a member of the COMMITTEE, or any of his relatives up to the fourth degree of consanguinity, second degree of affinity, or first civil degree, or his usual partner in businesses other than investments in **CONSTRUCTORA CONCRETO S.A.**, is questioned for conduct that may be indicated as money laundering, THE COMPLIANCE OFFICER shall warn about the questioning so that he is isolated from the meetings in which THE COMMITTEE will discuss and decide on the issue.

The member of the COMMITTEE may contribute, if he/she considers it pertinent, documents and information that help to clarify the suspicions and reaffirm the legitimate interest that the questioned member has as an investor of **CONSTRUCTORA CONCRETO S.A.**, keeping his/her distance from the discussions and decisions of the COMMITTEE until the COMPLIANCE OFFICER informs him/her of the decision that he/she may be reinstated due to the total clarification of the facts.

The above precepts also apply to the COMPLIANCE OFFICER, whose performance shall be temporarily relieved while the investigation is ongoing, and whose appointment shall be assumed by one of the Members appointed by the COMMITTEE, until the facts that gave rise to the suspension of his or her appointment are clarified.

If in the two previous cases, the suspicion is positive, THE COMMITTEE shall determine the definitive dismissal of the questioned member and shall proceed with the reports of paragraph d) of this clause.

11. DOCUMENT RETENTION POLICIES AND PROCEDURES

In order to guarantee effective support to the authorities, **CONSTRUCTORA CONCRETO S.A.** shall keep the documents and records related to compliance with the rules on prevention and control of money laundering, in accordance with the rules governing the preservation of books and commercial papers.

11.1 The SIPLA must foresee the procedure to be followed for the organization and conservation of the information generated in the development of the activities for the prevention and control of money laundering, in such a way that it allows to attend in an agile and efficient manner the requirements of the authorities. For this purpose, the following shall be taken into account:

- a) In cases of corporate reorganization processes, such as mergers, spin-offs and segregation, among others, the resulting entities must ensure continuity in strict compliance with this provision.
- b) In the event of liquidation, it is the liquidator's responsibility to adopt the necessary measures to ensure the archiving and protection of these documents.
- c) Regarding the documents that support the decision to determine a transaction as suspicious, **CONSTRUCTORA CONCRETO S.A.** shall arrange for the centralized storage of such documents with the appropriate safeguards, together with the respective report to the UIAF, in order to make them available in a complete and timely manner to the authorities when they request them.
- d) **CONSTRUCTORA CONCRETO S.A.** shall keep the forms established for the reports referred to in the preceding paragraph duly organized and available to the authorities. The information shall be kept at least in the filing office for the first three (3) years without prejudice to the duty of preservation of documents established in this numeral. The information contained in these forms shall be organized internally in a centralized manner in a database by alphabetical order, identification number and by office, in such a way as to allow immediate response to the requirements of the authorities and to be used efficiently by each entity for the detection of unusual and suspicious transactions.

The information received by **CONSTRUCTORA CONCRETO S.A.** by virtue of the provisions of this Circular is subject to confidentiality and may only be used for the purposes set forth herein.

11.2 Access to information by virtue of the controls adopted. Notwithstanding the obligation to send to the Financial Information and Analysis Unit (UIAF) the reports mentioned in paragraph c) of section 8.3 of this Manual, **CONSTRUCTORA CONCRETO S.A.** shall be obliged to provide the information required by the competent authorities.

11.3 Means of Dissemination, promotion and knowledge of the SIPLA manual: **CONSTRUCTORA CONCRETO S.A.**'s Management, and especially the Compliance Officer, shall ensure the dissemination of the money laundering prevention policies, shall promote the reading and application of the procedures designed for this purpose among the organization's personnel and shall maintain a campaign to disseminate its modifications.

11.4 Report of Modifications to the Financial Superintendence: Any modification made to this manual shall be reported to the Financial Superintendence within the month following the approval made by the Board of Directors of **CONSTRUCTORA CONCRETO S.A.**, to which a written record of its dissemination to the organization's personnel shall be added.

11.5 Confidentiality of the information reported. The persons related to **CONSTRUCTORA CONCRETO S.A.** as issuer of securities may not disclose to those who have carried out or intend to carry out suspicious transactions, that they have reported to the Financial Information and Analysis Unit (UIAF) information about them and, consequently, **CONSTRUCTORA CONCRETO S.A.** officials must keep the information reported to the UIAF confidential, in accordance with the obligation set forth in paragraph d) of numeral 2 of article 102 of the Organic Statute of the Financial Sector.

- a) The books and papers of commerce, with reference to accounting entries and vouchers, shall be kept for at least ten years (10) counted from their closing or the date of the last entry, document or voucher; after this period of time, these documents may be destroyed, provided that their exact reproduction is guaranteed by any suitable technical means. (art. 60 C Cio).
- b) The Chamber of Commerce where the books were registered will verify the veracity of the exact reproduction of the copy.
- c) The secretary of the same shall sign a record in which he/she shall note the books and papers that were destroyed and the procedure used for their reproduction, which shall be kept carefully by the Company.

12. PROCEDURE FOR RESPONDING TO REQUESTS FROM COMPETENT AUTHORITIES

- a) In the event that documents are required by the competent authority or a visit is made to **CONSTRUCTORA CONCRETO S.A.**, this will be attended by the Compliance Officer and/or the Statutory Auditor, who are fully empowered to disclose the Company's Policies and the Manual, approved by the Board of Directors, regarding the Prevention of Money Laundering.
- b) The documents required by the competent authority related to the management of the Company, its investments and the purchase and sale of shares shall be disclosed to the competent authority.
- c) The recommendations expressly indicated by the competent authority shall be complied with.

13. METHODOLOGIES, CRITERIA AND WARNING SIGNS FOR ANALYZING AND EVALUATING INFORMATION TO DETECT UNUSUAL AND SUSPICIOUS TRANSACTIONS AND THE PROCEDURE FOR REPORTING SUCH TRANSACTIONS

Unusual and suspicious transactions. For the purposes of the provisions of this Circular, the concepts of unusual operation and suspicious operation are understood as follows:

- a) **Unusual transaction:** A transaction whose amount or characteristics are not related to the economic activity of the investor.

CONSTRUCTORA CONCRETO S.A. shall make the evaluation according to the information provided by the Stock Exchanges and those who manage Centralized Operations or information systems for transactions, in compliance with the provisions of numeral 4.1 of External Circular No. 003 of 2005 of the Superintendence of Securities, and, if applicable, **CONSTRUCTORA CONCRETO S.A.** shall make the report of unusual or suspicious operation in accordance with the provisions of this Circular.

- b) **Determination of suspicious transactions:** The comparison of transactions detected as unusual, with information about investors should allow, according to the good judgment of **CONSTRUCTORA CONCRETO S.A.**, of its COMMITTEE FOR THE PREVENTION OF DEBT LAUNDERING, and of its COMMITTEE FOR THE PREVENTION OF DEBT LAUNDERING, to determine whether or not the transactions are suspicious, and if so, to determine whether or not they are suspicious. The SIPLA will be the one to establish in these cases, if it is necessary to document the analysis and the results of the evaluation made by the entity. The SIPLA will be the one to establish in these cases, if it is necessary to document the analysis and

the results of the evaluation made by the entity.

However, **CONSTRUCTORA CONCRETO S.A.** may consider as suspicious those operations of the investor that, although remaining within the parameters of its financial profile, with good judgment it considers in any case irregular or strange, to such an extent that they are not simply unusual.

The concept of suspicious transactions includes not only those that have actually been carried out, but also those that were attempted but for whatever reason were not effectively concluded.

Notwithstanding the provisions of paragraph 2.2.3 of External Circular 0010 of 2005, **CONSTRUCTORA CONCRETO S.A.**, may seek legal mechanisms to not establish a contractual relationship with an investor when, in its opinion, it is suspicious in the terms indicated in this paragraph. **CONSTRUCTORA CONCRETO S.A.** shall not be in breach of the provisions on control and prevention of money laundering by the mere fact of establishing or maintaining in force such relationship with the investor, since its duty is to immediately inform the competent authorities and, on the other hand, it may not be legally possible to terminate the contractual relationship.

c) Control and reporting procedures. **CONSTRUCTORA CONCRETO S.A.** has established the control procedures and mechanisms that allow it to identify unusual or suspicious operations, as well as the control and reporting procedure of transactions qualified as such. They are:

- **Control and registration of cash transactions.** In accordance with the provisions of numeral 1 of article 103 of the EOSF, during the period of placement in the primary market of the securities issued, the issuers must record, in accordance with Annex II of this Manual, the information related to cash transactions whose value is equal to or greater than ten million pesos (\$10,000,000) if in legal currency or five thousand United States dollars (US \$5,000) or its equivalent in other currencies, according to the market representative rate of the day in which the operation is carried out.

- **Reporting.** The SIPLA adopted by **CONSTRUCTORA CONCRETO S.A.** foresees an adequate system of internal and external reports, aimed at guaranteeing the operation of its own risk control procedures, as well as the compliance with the legal duty to collaborate with the authorities in charge of the fight against the crime of money laundering.

The following are the reports that **CONSTRUCTORA CONCRETO S.A.** shall carry out in this matter in order to be taken into account in the design of the SIPLA:

a) **Internal reporting of unusual transactions.** **CONSTRUCTORA CONCRETO S.A.** has established procedures for each officer responsible for the detection of unusual transactions, to report them to the

COMMITTEE FOR THE PREVENTION OF MONEY LAUNDERING. The report shall indicate the reasons for considering the operation as unusual.

- b) **Internal reporting of suspicious transactions.** **CONSTRUCTORA CONCRETO S.A.** determines the obligation to comply with the procedures of immediate and written report to the COMMITTEE as the competent body.
- c) **External report of suspicious transactions - STR.** Once the operation is defined as suspicious by the COMMITTEE, including those that were not carried out but were attempted, it shall be immediately and directly reported to the UIAF, according to the instructions given by the Superintendence of Finance in Circular 0010 of 2005, in accordance with Annex I. For the purposes of the STR, **CONSTRUCTORA CONCRETO S.A.** is not required to be certain that it is an illicit activity, nor must it identify the type of crime that applies, nor that the resources it handles come from illicit activities. It is only required that THE COMMITTEE considers that the operation is suspicious. Since the STR does not correspond to a criminal complaint, it does not have to be signed.
- d) **Report of cash transactions.** Once the placement period of the securities issued has ended, **CONSTRUCTORA CONCRETO S.A.**, as issuer of securities, shall submit to the UIAF the report on cash transactions referred to in paragraph 2.2.5.1. of Circular 0010 of 2005, by filling out the form provided in Annex III.

14. ELEMENTS AVAILABLE TO CONSTRUCTORA CONCRETO S.A. TO PROTECT AGAINST MONEY LAUNDERING

- a) Each shareholder shall fill out the form corresponding to Annex I, contemplated in Circular 0010, dated August 5, 2005, issued by the Superintendency of Securities, now the Superintendency of Finance of Colombia.
- b) Annually update the data recorded by the shareholders in the form, to be compared with the data recorded in the existing files.
- c) Prior to the purchase and sale of shares, it will analyze the requests of potential buyers and sellers, in order to determine the source of funds available for the purchase.
- d) It will periodically request financial information from its shareholders, referring to: Equity, value of monthly income and origin of resources used in operations carried out through intermediaries.

- e) **CONSTRUCTORA CONCONCRETO S.A.** as issuer of shares registered in the National Securities Registry and its Intermediaries, shall endeavor to keep updated the information regarding the shareholders who own one percent (1%) or more of its outstanding shares, for which purpose they shall send the linkage form to the last registered address of the Investor, at least once a year.
- f) When commercial transactions are carried out with foreigners residing in the country, a copy of the foreigner's identification card and the valid visa will be requested.
- g) If the commercial operation is carried out with legal entities, a copy of the company's certificate of existence and legal representation must be provided, with an issue date no older than one month (1), and this document must be renewed annually.

15. RESOURCES DESTINED TO THE PREVENTION AND CONTROL OF MONEY LAUNDERING.

15.1 Human Resources. In order to guarantee the effectiveness in the application of this manual, the personnel of **CONSTRUCTORA CONCONCRETO S.A.** shall be trained and committed in the detection, control and reporting procedures set forth herein, especially with the Board of Directors of **CONSTRUCTORA CONCONCRETO S.A.**, the company's Officers, the Committee for the Laundering of Assets, the Compliance Officer and his deputy, the Statutory Auditor, the personnel assigned to the General Secretariat and the Comptroller's Office, the secretary, the file and messenger personnel.

15.2. Technological resource: **CONSTRUCTORA CONCONCRETO S.A.** will make available to the system its computer equipment, databases and advanced technology communication systems such as internet, internal electronic mail, integrated filing system and classification of reserved information. In order to carry out a permanent follow-up and updating of its current and potential investors and to prevent the unscrupulous use of the company's investments to promote money laundering, on the other hand, these instruments will be at the service of a greater agility in the internal and external reports as control mechanisms.

FORM - ANNEX No. I

Attached to this manual is the form that contains the requirements for the Shareholder's Association to **CONSTRUCTORA CONCONCRETO S.A.**, which is filled out when the shareholders join the Company and updated periodically, to which a photocopy of the identity card or the foreigner's identification card, as the case may be, shall be added.

**DATA TO BE FILLED IN THE FORM FOR INDIVIDUALS
AND LEGAL ENTITIES**

Personal data

- ✓ Date of completion
- ✓ Applicant's first and last names
- ✓ Type of identification
- ✓ Identification number
- ✓ Sex
- ✓ Date and place of birth
- ✓ Address, telephone and city of residence
- ✓ Address, telephone and office location
- ✓ Revenues
- ✓ Expenses
- ✓ Assets
- ✓ Liabilities
- ✓ Source of funds
- ✓ Product to order
- ✓ Names, surnames, relationship, address, telephone number and city of residence of the reference.

EXCLUSIVE INFORMATION FOR COMPANIES

- ✓ Company name
- ✓ Nit. number.
- ✓ Type of company
- ✓ Company type
- ✓ Type of taxpayer
- ✓ Tax regime
- ✓ Financial obligations
- ✓ SIPLA
- ✓ Monthly income and expenses
- ✓ Total assets and liabilities
- ✓ Source of funds

Sincerely yours,

JUAN LUIS ARISTIZABAL VÉLEZ
Legal Representative