

SIPLA

Comprehensive System for the Prevention and Control of Asset
Laundering and Terrorist Financing



TGI
Grupo Energía Bogotá



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1. Glossary

Senior Management: Persons with the highest administrative or corporate hierarchical rank within the company. They are responsible for the company's Ordinary Course of business and are charged with creating, executing and controlling its objectives and strategies. This term also includes the corporate or general secretary and the Internal Auditor. Henceforth and for the effects of the Code of Good Corporate Governance of TGI, "Senior Management" shall be construed as referring to the Chairman, the Vice-presidents and all the officials who directly report to the Chairman of TGI.

Shareholders: Shareholders are persons who own one or more stocks of the **Company** and whose ownership of the same grants them the condition of partners and owners of the **Company** in proportion to their participation in the Company, as well as the rights acknowledged by the Law and the Articles of Association.

Landlord: The Landlord is the owner of the goods and is, of course, the party capable of leasing it or allowing its usage by others. It is the person who leases that which belongs to them. Legal entity who owns the rented or leased good.

Tenant: The Tenant is the person who acquires the right to use an asset in exchange for the payment of a fee. The person taking the lease for something. Physical or legal entity renting a good.

Self-control: It is the capacity of each and every one of the company's collaborators to, regardless of their hierarchy, assess and control their work, identify deviations and apply corrections in the exercise of and compliance with their functions, as well to improve their tasks and responsibilities.

Collaborator: Within Transportadora de Gas Internacional, this refers to workers, practicing students and apprentices.

Client: For the effects of this Manual, they are the individuals or legal entities with which the Company establishes a contractual or legal relationship for the supply of goods and services.

Beneficiary Client: For the effects of this Manual they are the individuals or legal entities benefitting from the delivery of a public service, whether as owners of the real estate where such service is delivered or as direct recipients of the service.

Due Diligence: Due Diligence in the prevention of Asset Laundering consists of developing the necessary actions to get properly acquainted with the Groups of Interest with which Transportadora de Gas Internacional keeps commercial relations, reinforcing their knowledge of those who due to their business activity or condition are sensitive to Asset Laundering or to Terrorist Financing, complying with each and every one of the obligations set forth by the Law and the present Manual, the Code of Ethics and in the dispositions issued by Transportadora de Gas Internacional on the topic of prevention of Asset Laundering and Terrorist Financing in the most efficient and diligent manner possible.

Reinforced Due Diligence: It is related with the compliance with the regulations on detailed and thorough knowledge of the party and all other dispositions on prevention of Asset Laundering and Terrorist Financing in order to determine in the most efficient and diligent manner possible at which time activities can be potentially suspicious.



Direct Depositors: These are the entities with direct access to deposit services and which act on their own behalf or on behalf of third parties.

TGI and/or the Company: Acronym in Spanish for “Transportadora de Gas Internacional, S.A, E.S.P.”

Risk Events: All incidents and occurrences that generate uncertainty within the entity and which could negatively affect the ordinary course of the corporate object.

Terrorist Financing: Crime contemplated within the Criminal Code of Colombia (Art. 345) in which individuals or legal entities can incur in by directly or indirectly supplying money or goods linked with terrorist activities.

Sources of Risk: This refers to the **AL/FT** risk-generating agents within Transportadora de Gas Internacional that must be taken into account to identify situations that may generate risks in the operations, business or contracts made by the Company.

Groups of Interest: All persons who by virtue of their relationship to the Company hold an interest in it. Among them are the general public, shareholders, suppliers, clients, users, economic and tax authorities, among others.

AL/FT Risk Management: It consists of adopting policies and procedures that allow the prevention and control of **AL/FT**.

FATF: Acronym for “Financial Action Task Force”.

GAFISUD: Acronym in Spanish for “Financial Action Task Force for South America against Money Laundering”.

Board of Directors: The **Company’s** administrative organ, comprising nine main members with their respective deputies, elected by the General Shareholders Assembly. The Board of Directors, as the highest strategic management organ, determines the Company’s general policies, ensures the compliance with the rights and equal treatment of all the shareholders and the stability and development of TGI in the short, medium and long term. The Board is responsible for supervising the performance of the Senior Management, verify the quality of disclosed information, set the guidelines to manage risks and follow-up on policy compliance and on the corporate governance schemes demanded by the Law or those schemes otherwise adopted by TGI.

Asset Laundering: Crime contemplated within the Criminal Code of Colombia (Art. 323) in which individuals or legal entities can incur in acquiring, keeping, investing in, transporting, transforming, safeguarding or administering goods that originated remotely or immediately from activities linked with extortion, illicit enrichment, extortive kidnapping, rebellion, trafficking in arms, crimes against the financial system, public administration or linked with the product of crimes object of a conspiracy to commit a crime related with the trafficking of toxic, narcotic or psychotropic drugs, or for making the goods resulting from the aforementioned activities appear legal or legalizing them, hiding or concealing their true nature, origin, location, destination, movement or ownership rights, or by performing any other act to hide or conceal their illegal origin.

AL/FT: Acronym for “Asset Laundering and Terrorist Financing”.

Caution Lists: Means public databases (other than restrictive lists) used by **TGI** as support in its activities to prevent **AL/FT**.

National and International Lists: Lists of persons and companies that, as per their publishing organism, may be linked with illegal activities. For example, lists by the UN Security Council, OFAC, INTERPOL, National Police, among others.

Restrictive Lists: Databases issued by international organisms (OFAC / UN) with which Colombia keeps cooperation agreements to fight against **AL/FT**.

Binding Lists: Lists of persons or entities associated with either terrorist organizations or criminal activities of compulsory verification by Colombian authorities by virtue of international treaties. As of the date of approval of the present manual, the only binding list for Colombia in compliance with international law is the list issued by the United Nations' Security Council under resolution 1267 of 1999.

Monitoring: Process to follow up on the decisions and actions for risk management in order to verify whether or not the exposure and risk can be reduced.

Omission of Report: Crime contemplated within the Criminal Code of Colombia (Art. 441) in which individuals or legal entities can incur when, in possession of knowledge of the commission of a crime of genocide, forced displacement, torture, forced disappearance, homicide, kidnapping, extortive kidnapping, drug trafficking, illegal enrichment, the use of front men, asset laundering or any of the conducts contemplated by the Criminal Code of Colombia, they omit to immediately inform about such activities to the authorities without just cause.

Intended Operation: This means instances when there is knowledge of an individual or legal entity's intention to carry out a Suspicious Operation, but the same does not come to fruition as the person desists from it or because the established or defined controls stopped it from happening. These operations shall also be reported to the FIAU.

Unusual Operation: An operation of an amount or with features that do not correlate with the shareholder's economic activity and for which the Company could not find a reasonable explanation or justification.

Suspicious Operation: This refers to an Unusual Operation that, after comparing it with the relevant information, including that from Groups of Interest when required, and in compliance with the reasons established by Transportadora de Gas Internacional, is identified as Suspicious for its timely and efficient report before the Financial Information and Analysis Unit – FIAU. The concept of Suspicious Operation includes not only completed operations, but also those operations that were attempted but never concluded.

OFAC: Acronym for “Office of Foreign Assets Control”, an entity attached to the Treasury Department of the United States of America charged with managing the SDN list (“Specially Designated Nationals”) in Colombia.

UN: List of natural persons and entities prepared and updated in compliance with Resolution No. 1267 of 1999 Insecurity Council. The list's full name is: Consolidated List on Al-Qaeda, Osama Bin Laden and the Taliban and other persons, Groups or Companies and entities associated to them.

Politically Exposed Persons (PEPs): Individuals who hold or have previously held notable public positions, such as heads of State, high-ranking politicians, high-ranking government, judiciary or military officials, senior executives from State companies and important officials from political

parties (Definition taken from the 40 Recommendations of the FATF). Decree 1674 of 2016 contains a list of positions and charges of which the incumbents are considered PEPs. This list has been incorporated into this Manual, as are the other regulations contained in the cited decree.

Supplier: Individuals or legal entities or any kind of association that may be able to cover the Company's staff recruitment needs.

Internal Reports: Those used within Transportadora de Gas Internacional, which can be prepared by any member of the **Company** with knowledge of a possible Intended, Unusual or Suspicious Operation.

RSO: Acronym for "Report of Suspicious Operation". Once a Suspicious Operation is determined, the Compliance Officer proceeds to immediately reporting it to the FIAU via the tool created for such purpose.

Risk of Asset Laundering or Terrorist Financing (AL/FT): means the possibility of loss or damage a Company can suffer when used to commit the crimes of Asset Laundering or Terrorist Financing.

Alert Signs: These are the facts, situations, events, amounts, quantitative and qualitative indicators, financial reasons and characteristics of Shareholders and Shareholders themselves that the company determines to be relevant and which allow the detection of unusual or suspicious operations.

Easement: Property Easement or Simple Easement, a tax or levy over a property used as a utility of a different property owner. It can also be construed as the right of way that must be granted to use a given real estate for the execution of a given work as a public utility.

FSC: Acronym for Financial Superintendence of Colombia.

CSCAL: Acronym for "Comprehensive System for the Prevention and Control of Asset Laundering and Terrorist Financing". The **CSCAL** is made up by the group of the minimum policies, procedures, mechanisms and instruments designed and implemented for the prevention and control of Asset Laundering and Terrorist Financing -**AL/FT**- in the placement and negotiation of stock issued by **TGI** in its capacity of stock issuer.

Financial Information and Analysis Unit – FIAU: Special Administrative Unit with legal character, administrative autonomy, independent assets and special regimes regarding staff administration, nomenclature, classification, salaries and social benefits, with a technical character, attached to the Ministry of Finance and Public Credit of Colombia. The functions of this Unit shall be to allow State intervention to detect practices associated with Asset Laundering, and it was created via Law 526 of 1999, modified by Law 1621 of 2013, which aims to prevent and detect operations that may be used for Asset Laundering or Terrorist Financing. Additionally, the Unit imposes obligations to report operations to certain economic sectors, and is the State entity charged with centralizing, systematizing and analyzing data related with Asset Laundering operations; this means that the Unit is an information filter that uses technology to consolidate and add value to all collected data, allowing it to detect operations that may be related with the crime of Asset Laundering.



2. General Considerations

1. The Board of Directors of **Transportadora de Gas Internacional S.A. E.S.P.**, in its session held on August 15, 2013, approved the “Comprehensive System for the Prevention and Control of Asset Laundering and Terrorist Financing” (**CSCAL**), which is reflected in Minutes No. 1507 of 2013.
2. The Board of Directors of **Transportadora de Gas Internacional S.A. E.S.P.**, in its session held on December 14, 2016, approved the modifications made to the “Comprehensive System for the Prevention and Control of Asset Laundering and Terrorist Financing” (**CSCAL**), which is reflected in Minutes No. 1567 of 2016.
3. In compliance with Article 102 of the Organic Statute of the Financial System (EOSF, acronym in Spanish), modified by Article 1 of Law 1121 of 2006, all entities subject to the control of the Financial Superintendence of Colombia (FSC) or whichever body acting on its behalf, shall be obligated to adopt the appropriate and sufficient control measures oriented to prevent the operations of the aforementioned entities from being used as a means to hide, handle, invest in or take advantage of money of any kind or any other goods resulting from or destined to finance criminal activity or to make appear legal criminal activities or the transactions or funds linked with such criminal activities.
4. According to Part III, Title I of Chapter VII of the Basic Legal Circular (External Circular Letter 029 of 2014), stock issuers not subjected to permanent inspection and vigilance by the FSC, except from the Nation, must apply the instructions on prevention and control of Asset Laundering and de la Terrorist Financing to all stock issuers not under the surveillance of the FSC.
5. It is a function of the Board of Directors to enforce the policies for the prevention and control of **AL/FT** as well as to approve the **CSCAL** manual and its updates, in compliance with paragraphs 2.2.1.1 and 2.2.1.2, Part III, Title I of Chapter VII of the Basic Legal Circular.



3. Introduction

Transportadora de Gas Internacional S.A E.S.P. is a public services Company constituted as a joint- stock Company assimilated to public limited companies with administrative, patrimonial and budgetary autonomy in compliance with the contents of Law 142 of 1994, subject in all its acts to private law, and domiciled in the city of Bogotá. Transportadora de Gas Internacional ,has as its main object to Transport gas and midstream, which generates value for its Shareholders and Groups of Interest via its sustainable and profitable management of its business, which contemplate the stock participation in companies within the energy chain, including generation, transmission, distribution and commercialization of electrical energy, as well as the transportation and distribution of natural gas.

The GEB contributes to the development of the countries where it operates and leads projects that have an impact on the productivity and competitiveness in all the territories it operates in in order to efficiently and responsibly support the growth of demand of electrical energy and natural gas.

In this sense, and via this Manual, **TGI** aims to put to practice the methodologies and procedures inherent to the **CSCAL**, complying with the design and implementation of the system for the prevention and control of Asset Laundering and Terrorist Financing, in compliance with the requirements established in Part III, Title I of Chapter VII of the Basic Legal Circular, thus creating a culture oriented towards the fulfillment of the norms set on the matter within the organization.

Due to the foregoing, the present Manual assigns institutional responsibilities and establishes the duties that **TGI's** managers must comply with, as well as its Collaborators, via the adoption of specific procedures of mandatory compliance.

This Manual shall be periodically updated and remain at the disposal of the FSC.



4. Scope of Application of the System

The dispositions set forth in the present Manual shall be applicable to the following persons and/or events:

4.1 Placement of Stocks

4.1.1 Placement of Stocks in the Primary Market

4.1.1.1 Direct Placement of Stocks:

When TGI carries out a Placement of Stocks in the Primary Market directly, the Financial Vice-presidency shall comply with the procedures set forth below:

4.1.1.2 Knowledge by the Shareholder:

Knowledge by the Shareholder starts the moment an individual or legal entity intends to acquire stock issued by TGI. For the linkage of shareholder, the incumbent of the Financial Vice-presidency must comply with the following requirements:

A. Obtain from all the persons wishing to purchase stock in TGI in order to be accepted as Shareholders this linkage form properly filled out, which contains the following information:

NP: Linkage of a Natural Person
LP: Linkage of a Legal entity

DESCRIPTION	NP	LP
Complete names and last names or Business Name of the Investor	X	X
Identification of the security title the person wishes to acquire	X	X
Colombian Nationals: Identification number (NIT), citizenship card of the investor.	X	X
Foreign Investors: Identification number (foreigner's identification card), valid passport for holders of tourist, visitor or any other kind of visa with a validity of under three (3) months, or carnet issued by the Protocol Division of the Ministry of Foreign Affairs for holders of Preferential Visas (diplomatic, consular, service, international organisms or administrative officials, as the case may be, and in compliance with valid migratory regulation).	X	X
Tourist nationals from member countries of the Andean Community of Nations: Identification number, valid identity document in the issuing country with which they enter Colombia.	X	
Complete names and last names of the representative, proxy and identification number of the investor.	X	X
Address and telephone number of the legal representative.		X
Place and date of birth of the investor.	X	
Address and telephone number of the investor's residence.	X	
Occupation, trade or profession of the investor.	X	
Description of the Investor's Activity: - Independent, dependent, charge they occupy. - Main Economic Activity: commercial, industrial, transportation, construction, agribusiness, financial services, etc., as established in the ISIC international code.	X	X
Name, address, fax and telephone number of the office, company or business where the investor works, if applicable. Name, address, fax and city of the main office and the branch or agency acting as investor.	X	X
Identification of the shareholders or associates who directly or indirectly own over 5% of the share capital, contribution or participation.		X
Type of company of the investor: private, public or mixed.		X
Statement of origin of the goods and/or funds of the investor, as applicable (may be joint as annex).	X	X
If the investor depends on a third party, relevant information on such third party.	X	X



If the potential shareholder's activity involves transactions in foreign currency, the form must contain spaces to collect the following information:

DESCRIPTION	NP	LP
Kind of operations in foreign currency usually performed by the investor	X	X
Financial products the investor possesses in foreign currency, specifying at least: type of product, product identification, entity, amount, city, country and currency.	X	X

In cases of Shareholders with economic dependence on a third party, the information of the person(s) from whom the resources used for the investment originate shall be requested.

Public Law legal entities shall also deliver the linkage form, with signature and the required fingerprint of their Legal Representative in the present Manual.

B. Request of documents joint to the linkage form

Besides the delivery of the linkage form, the Shareholders linkage process also includes the recollection of documental information that allows **TGI** to possess additional information on potential shareholders and to facilitate the verification and confirmation of the received information.

To such an end, all potential Shareholders are requested the following documents during their linkage process with **TGI**:

Annexes to the linkage forms for Natural Persons:

- Copy of the identification document.
- Income and deduction certificate.
- Work certificate.
- Rent declaration for the last two available taxable periods, or letter of non-tax-declaring individual.
- Certificate of the origin and source of the funds to be used to purchase the stock.
- Certified or audited financial statements of the last available period at the time of the shareholder's linkage, when applicable.
- Annexes to the linkage forms of legal entities.
- Certificate of existence and legal representation with a validity of no more than three months issued by the Chamber of Commerce • Copy of the NIT • Copy of the RUT • Copy of the identification document of the Legal Representative • Certified or audited Financial statements • List of partners with ownership of 5% or more of the share capital, if such information is not present in the Certificate of existence and legal representation. In cases of entities that are not partnerships, a list of the members of the Board of Directors or the organ acting in such capacity shall be attached in case they do not appear in the Certificate of existence and legal representation.
- Rent declaration for the last two available taxable periods.

When acting via proxy to make the investment, the duly signed and authenticated written accreditation of the power of attorney with recognition of the signature, fingerprint and content must be demanded. In case of various beneficiaries, they must all be registered in the power of attorney and one of them must sign the present document.

If a potential shareholder fails to timely deliver the duly completed linkage form and all the required annexes, they may not participate in the stock allocation.



C. Verify the adequate and complete filling out and delivery of the linkage form, as well as the delivery of all required information annexes.

Once the person intending to acquire the Company's stocks has delivered the properly completed linkage form to **TGI**, as well as all required documental support, the adequacy of the delivered form, supports and all other supplied information are verified, as well as their correspondence with the information supplied in the form.

D. Confirmation of the information supplied in the linkage form.

Before the shareholder's linkage, the Financial Vice-presidency confirms the information they provide within the terms given in the following table, counting from the date of reception of the documents:

AMOUNT OF ACQUIRERS	TERM
Up to 100 acquirers	5 days
From 101 to 200 acquirers	10 days
From 201 to 300 acquirers	20 days
From 301 to 500 acquirers	30 days
From 501 to 1000 acquirers	40 days
From 1001 to 2000 acquirers	50 days
From 2001 to 5000 acquirers	60 days
Over 5000 acquirers	120 days

Paragraph: in the event that the supplied information by a shareholder cannot be confirmed or is inaccurate, the fact shall be immediately reported to the Compliance Officer as provided for herein.

If the information supplied by the shareholder is inconsistent, the Compliance Officers shall proceed to send a Report of Suspicious Operation (RSO) to the FIAU in compliance with what is set forth in this Manual.

E. List Verification

Before the linkage, the shareholder must be verified in the corresponding lists. In the case of legal entities, the shareholders, members of the Board of Directors and the Legal Representative must also be verified. There must be evidence of all of the aforementioned verifications.

In case of any exact coincidence, the linkage process shall stop at once and the fact reported to the Compliance Officer in order to determine the next steps.

Should the coincidence arise in the UN List, the Compliance Officer shall inform the fact to the FIAU or to the entity acting in its capacity.

F. Exceptions to the obligation to deliver the shareholders linkage form

The information requirements set forth in this Manual will not apply to the following:

- Security issuers or entities enrolled in the National Registry of Securities and Issuers of Colombia.

- Entities subject to inspection and surveillance by the Financial Superintendence.
- Multilateral Organisms.
- National, departmental and municipal entities, unless in cases of State industrial and commercial companies, public capital companies or mixed commercial companies not subject to inspection and surveillance by the FSC.

G. Update of the Shareholders' Information:

The information contained in the linkage form and in its annexes must remain updated regarding Shareholders who own 1% or more of TGI's circulating stock.

To this end, the shareholder will be annually requested to update their information via a written communication. Once the **Company** receives the information, its thoroughness and correspondence with the linkage form are verified. In addition, it is also checked that the information is complete and to verify once more than the shareholder is not included in national or international lists, binding or non-binding for Colombia. In case of coincidences, the procedure shall be as described in section E. Finally, the information is kept in the shareholder's file.

H. Periodic Verification of the Shareholders in the OFAC's SDN Lists and in the UN List

Before their linkage with the **Company**, shareholder is checked in the OFAC's SDN List (You can check the OFAC List in: <http://www.ustreas.gov/offices/enforcement/ofac/sdn/>) and in the terrorist list issued by the United Nations' Security Council (Consolidated List of physical persons and entities members of the Taliban from the AL-QAEDA organization or associated with them issued by the United Nations' Security Council: Binding Lists for Colombia by virtue of treaties signed within the framework of international law: <http://www.un.org/spanish/docs/comitesanciones/1267/1267ListSpa.htm>). In the case of legal entities, Shareholders, members of the Board of Directors and Legal Representatives of the company with a participation equal or superior to 5% of the share capital must be verified.

In case of any exact coincidence, the Financial Vice-presidency can carry out the report process and inform the Compliance Officer to determine the next steps to take.

Every year, the Compliance Officer verifies all the Shareholders in national or international lists, binding or non-binding for Colombia. In case of any exact coincidence, all movements by the shareholder in the last year to detect any possible unusual operations. In addition, a Report of Suspicious Operation (RSO) is sent to the FIAU in compliance with the present Manual.

If the coincidence is with the UN List, the official shall report the fact to the FIAU or to the entity acting in its capacity. If the coincidence is with any other list, the legally adequate treatment shall be given.

4.1.1.3 Knowledge band Shareholders Catalogued as Publicly Exposed Persons

As a complement of what is set forth in decree 1674 of 2016, all PEP's shall be identified via the asking of the following questions in the linkage form:

- Do you handle public resources? Do you hold any degree of public power? Are you publicly recognizable?

- Any time that a shareholder catalogued as a PEP is to be linked, once the requirements for the linkage are complied with all supports of the operation shall be sent to the Legal Representative for the approval of the linkage.

4.1.1.4 Electronic Consolidation of Cash Transactions Made by the Shareholder

TGI consolidates all cash operations made by shareholders monthly, in order to detect possible unusual operations and to send the corresponding Reports to the FIAU.

4.1.2 Criteria for Choosing the Placement of Stocks via Entities Surveilled by the Financial Superintendence of Colombia

As long as TGI places stock via entities under surveillance of the Financial Superintendence, such entities must apply their respective System for the Management of Risk of Asset Laundering and Terrorist Financing (**SARLAFT**, acronym in Spanish) over such operations.

4.1.2.1 Criteria for Choosing the Intermediary

Before placing the stock, TGI, via its Financial Vice-presidency, shall bear in mind the following criteria to choose the intermediary or intermediaries that will carry out the operation:

- Submit it to the consideration of the corresponding committees depending on the amount of the contract and in compliance with the **Company's** Recruitment Manual.
- Gather enough information on the intermediary, including if they have been object of sanctions or interventions by the controlling authority due to Asset Laundering or Terrorist Financing particularly regarding the placement of interest securities for TGI, as well as any information that allows to establish a transparent relationship for both parties.
- Determine that the entity has enough controls to prevent and control Asset Laundering and Terrorist Financing, particularly regarding the placement of interest securities for TGI.
- Documenting the respective responsibilities of each institution regarding **AL/FT**.
- Apply stricter procedures to follow up on the aforementioned relationship.
- Ensure that the intermediary complies with the client's knowledge measures, particularly regarding the placement of interest securities for TGI.
- Contemplate these duties and the required procedures, controls and responsibilities for their proper execution, in the corresponding contract.

4.1.3 Delivery of Information to the Shareholders

Any time that a Placement of Stocks is carried out via different entities under surveillance of the **FSC**, TGI shall consolidate the Shareholders' information. To such an end, TGI shall designate one of the intermediaries participating in the placement to carry out the Delivery of Information to the Shareholders. In such case, each of the surveilled entities participating in the process must apply their respective **SARLAFT** over such operations and individually prepare the Reports as established in External Circular No. 029 of 2014 (Basic Legal Circular) of the **FSC**.

4.1.4 Placement of Stocks Abroad

When **TGI** places stock abroad it shall, via its Compliance Officer or Finance and Investor Relations Division, request the intermediary entity carrying out the placement a certificate issued by the Legal Representative or the person acting in a similar capacity stating that all norms on the topic of prevention and control of Asset Laundering and Terrorist Financing demanding in the respective countries.

4.1.5 Negotiation of Stocks in the Secondary Market

4.1.5.1 Negotiation of Stocks via Entities Surveilled by the FSC

As long as negotiations for values issued by **TGI** are made via entities under the surveillance of the **FSC**, these entities are charged with applying its respective System for the Prevention of Asset Laundering and Terrorist Financing (**SARLAFT**) over such operations.

4.1.6 Direct Negotiation of Stocks by TGI

In the event that **TGI** disposes of nominal securities directly, before registering the disposal in the corresponding registry book, the Shareholders shall deliver the linkage form and **TGI** shall confirm the supplied data in such report in compliance with what is set forth in the present Manual.

4.1.7 Placement of Stocks Abroad

Before placing securities abroad, **TGI**, via its Financial Vice-presidency shall bear in mind the following criteria for the choosing of the intermediary or intermediaries that will carry out the operation:

- Submit it to the consideration of the corresponding committees depending on the amount of the contract and in compliance with the **Company's** Recruitment Manual.
- Gather enough information on the intermediary, including if they have been object of sanctions or interventions by the controlling authority due to Asset Laundering or Terrorist Financing particularly regarding the placement of interest securities for **TGI**, as well as any information that allows to establish a transparent relationship for both parties.
- Determine that the entity has enough controls to prevent and control Asset Laundering and Terrorist Financing, particularly regarding the placement of interest securities for **TGI**.
- Documenting the respective responsibilities of each institution regarding **AL/FT**.
- Apply stricter procedures to follow up on the aforementioned relationship.
- Ensure that the intermediary complies with the client's knowledge measures, particularly regarding the placement of interest securities for **TGI**.
- Contemplate these duties and the required procedures, controls and responsibilities for their proper execution, in the corresponding contract.

Regarding contracts that are valid at the time of approving the present modification, the Strategic Supply Division shall carry out the necessary procedures in order to gather, in the following three (3) months, all the relevant information so as to diminish the risk of **AL/FT** in compliance with the aforementioned criteria. Once this term expires, the same collaborators shall present an evaluation report before the Board of Directors and propose an action plan in order to mitigate the eventual risks.



4.1.8 Detection of Unusual Operations, Determination and Reporting of Suspicious Operations

4.1.8.1 Detection of Unusual Operations for Shareholders in Direct Placement

Each month, the Compliance Officer shall follow up on all the operations made by the Shareholders in cases of Direct Placement of Stocks in order to determine the existence of possible unusual operations.

During the review of the operations made during the preceding month, as long as one of the following cases arises, an unusual transaction alert shall arise in cases of:

- Shareholders with information requirements before the competent authorities.
- Investments that surpass the shareholder's declared income.
- Investments for amounts over 15 current legal minimum wage (SMLV, acronym in Spanish).
- Investments paid in cash for over 7 SMLV.
- Three or more investments in the same calendar month by the same shareholder.
- Internal report by any Company official in compliance with what is set forth in the present Manual.

The result of the revisions as well as of the generated Alert Signs is delivered in a monthly report filed to the division of the Compliance Officer chronologically.

Once the alerts are generated, the Compliance Officer shall open a folder for each opened case and subsequently analyze each of them to determine the existence of suspicious operations.

To perform the analysis, the steps below must be followed:

- Compare the amount of the operation with the client's income (According with the information supplied in the linkage form and its annexes).
- Compare the amount of the operation with the client's equity (According with the information supplied in the linkage form and its annexes).
- Verify the shareholder's previous operations with **TGI**, if any (amount, periodicity).

Once the steps mentioned above are completed, the Compliance Officer or the person he or she designates shall prepare a report with the conclusions and results of the analysis and include it in the folder that corresponds to each case. This report shall contain, at least, the following information:

- Date
- Official responsible for the analysis
- Duly identified alert sign in the operation
- Conclusions of the analysis

Considering the responsibilities that have been assigned to the Compliance Officer, the Official may hire via third parties some of the previously described tasks in compliance with what is set forth in the Recruitment Manual.

In cases when such tasks are effectively hired, the Compliance Officer receives the report described above and continues with the process as follows:

The results' analysis is brought before the Compliance Officer who, depending on the circumstances, information and results of the analysis determines whether or not the operation is suspicious.

If the Compliance Officer determines that the operation is not suspicious, the supports and results of the analysis are filed to the division of the Compliance Officer chronologically.

If the Compliance Officer determines that the operation is suspicious, he or she shall proceed to issue a Report of Suspicious Operation (RSO) before the Financial Information and Analysis Unit - FIAU. This report is made via the FIAU's RSOEL system, the information of which can be found in this link: <http://www.FIAU.gov.co/index.php?idcategoria=2626>.

Once the report is issued, the case's documents are filed under a folder called "Reports of Suspicious Operations" that is kept under lock in the area of the Compliance Officer.

In addition to the monthly follow up to operations, as long as a Collaborator of **TGI** in the development of its functions detects an Unusual Operation, they shall immediately report such fact in writing to their superior, indicating the operation's characteristics and all features they qualify as unusual and report them to the Compliance Officer in compliance with what is set forth in the present Manual.

4.1.8.2 Design of Alerts for Detecting Unusual Operations.

When new relevant circumstances to bear in mind regarding the detection of unusual operations arise, new Alert Signs to detect unusual operations must be designed, which contemplate the new circumstances.

Once the aforementioned alerts are designed, they are included within the activities established in this paragraph.

4.1.8.3 Objective Causes of Reporting on Transactions with Shareholders:

The objective causes for reporting direct and indirect placement are the following:

- The inability to clearly identify the motive of the presented unusual operation.
- Individuals or legal entities that are in the OFAC run Lists, if mentioned before the prosecution it shall be a cause as long as the situation at hand mentions crimes of asset laundering, financing of terrorist activities or proliferation of weapons of mass destruction, or a source crime for asset laundering.
- If by news information known to the Compliance Officer an individual or legal entity linked with **TGI** is involved with Crimes Leading to Asset Laundering, Terrorist Financing and/or proliferation of weapons of mass destruction.
- False or misleading information to cover Asset Laundering, Terrorist Financing and/or proliferation of weapons of mass destruction during linkage processes as a party in **TGI**.

4.1.8.4 Determination and Reporting of Suspicious Operations

As long as an Unusual Operation cannot be duly justified it shall be catalogued as suspicious. This evaluation is performed by the Compliance Officer and is made based on strictly objective criteria. All Suspicious Operations shall be immediately reported to the FIAU by the Compliance Officer.

4.1.9 Control and Reporting Procedure

4.1.9.1 Control and Registry of Cash Transactions

In compliance with what is set forth in Article 103 of the Organic Statute of the Financial System, **TGI** must provide proof of the information relative to cash transactions made by the Shareholders in cases of Direct Placement of Stocks the value of which is equal or superior to ten million Colombian pesos (COP 10.000.000) if the transaction is in national currency, or to five thousand American dollars (USD \$5.000) or its equivalent in other currency in compliance with the representative market rate of the day when the operation is made. The form to collect the cash transactions' information must contain the following fields, at minimum:

- The identity, signature and address of the person physically performing the operation.
- The identity and address of the person on behalf of whom the transaction is made.
- The identity of the beneficiary or recipient of the transaction, if any.
- The identity of the affected account, if any.
- The type of transaction.
- Identification of the entity where the transaction is made.
- The date, place, hour and amount of the transaction.

All multiple cash transaction made in national or foreign currency that together surpass fifty million Colombian pesos (COP 50.000.000) must be considered a single transaction as long as they are made by or in benefit of the same person on the same day.

4.1.9.2 Reporting of Cash Transactions

This activity applies in events where the **Company** issues securities and places them in the primary market directly, meaning without the intervention of an entity under surveillance of the FSC, for which it does the following:

- Once the placement period ends, the Compliance Officer sends the form to designated person as per subparagraph 2.8.1., via the delivery of the form foreseen in annex 3 of External Circular Externa 029 of the FSC of Part III, Title I, Chapter III, with all cash transactions of a value equal or superior to ten million Colombian pesos (COP 10.000.000) if done in local currency or to five thousand American dollars (USD \$ 5.000) or its equivalent in other currency in compliance with the representative market rate of the day when the operation is made.
- Once the placement period of the issued securities ends, the Compliance Officer sends to FIAU the report on the transactions presented at Carrera 7 # 31-10 Piso 6, Bogotá, D.C., or to the e-mail address: efectivo@FIAU.gov.co.
- Once the report is sent, all the reported operations are verified in order to determine the existence of unusual operations.
- In the event any Unusual Operation is detected, the activities described in the present Manual begin to be carried out.



4.2 Linkage with Suppliers:

For Linkage with Suppliers, the Strategic Supply Division or the third party designated to such effect shall perform the following controls for suppliers' registration:

- a) Delivery of a linkage form containing fields to collect, at least, the following information:
 - Full names and last names or business name
 - Identification number
 - Description of the economic activity (in compliance with the ISIC)
 - Certificate of Existence and Legal Representation with a validity of no more than three months
 - Identification of the Shareholders who possess 5% or more of the share capital
- b) For full supplier registration, the following additional information will also be requested:
 - Share capital
 - Equity
 - Monthly income and expenditures
 - Annual turnover
 - Last official balance
 - At minimum, a commercial reference and bank certificate
- c) Request the Compliance Officer to verify the Restrictive Lists on Suppliers. In cases of legal entities, the members of the Board of Directors, Legal Representatives and Shareholders possessing 5% or more participation in the share capital are verified.
- d) Every time a creditor (individual or legal entities) is going to be registered or created in the SAP system for their subsequent payment must request a consult of Restrictive Lists to the Compliance Officer, leaving sufficient evidence of the process.
- e) In addition to what is established in decree 1674 of 2016, all PEPs will be identified via the following questions made in the linkage form:
 - Do you handle public resources?
 - Do you hold any degree of public power?
 - Are you publically recognizable?
 - Every time a supplier that must be catalogued as a PEP is going to be linked, the validations made to them to assign them such status shall be present in the joint documents.
 - Request of the authorization of the information supplied in the linkage form and in the corresponding supports every year, as long as the supplier keeps the contractual relationship.
 - Verification that the supplier and its shareholders possessing 5% or more participation in the share capital in the corresponding Restrictive Lists before its linkage to **TGI**, leaving the necessary evidence of the process.
 - Verification of the data supplied in the linkage form vs the support documents delivered by the supplier.



- f) For a proper monitoring of the suppliers, and considering that the verifications in Restrictive Lists have no surveillance whatsoever, the aforementioned controls' application is recommended in the following cases:
- When contract modifications arise
 - When there are changes of Legal Representatives, Board members, shareholders or business name.
 - When recruitments surpass a year of execution
 - Every time the governing authorities deem it necessary
- g) For the inclusion of any supplier, they must be properly assessed by the Company delivering the supplier registry service or the entity acting in such a capacity, which will have to guarantee compliance with the minimum supplier knowledge requisites referring, mainly, to the topics of documentation and existence of the supplier in question.

4.3 Linkage with Collaborators:

For Linkage with Collaborators, the Human Resources and Services Vice-presidency via the Human Management Division shall keep the following controls, as long as the charge to be occupied by the candidate is considered high risk in the area of **AL/FT**, considering that they may easily and in the highest degree compromise the entity due to their functions. Among these people are: the Chairman, Vice-presidents, Directors and Managers.

- A security study of all possible collaborators is performed by which the information on studies, work references, personal references, legal background and home visit is validated.
- The Compliance Officer is requested to verify the Restrictive Lists for information on collaborators before their linkage with **TGI** with evidence of the process.
- The collaborator is asked to deliver the form to state the origin of their goods and funds, as well as a certificate the states they have no relation to any criminal process of Asset Laundering and Terrorist Financing.

The Human Resources and Services Vice-presidency shall prepare a list of high risk charges in the matter of **AL/FT**, which is to be officially adopted within the month following the approval of this Manual by the Board of Directors. The recommended criteria to determine if a charge should be considered high risk in the matter of **AL/FT** are:

- Their ability to influence processes.
- The charges can compromise the company in a higher degree from a reputation and contagion standpoint.
- They handle a large number of subordinates.
- They act as risk managers within the entity.
- Due to their hierarchical level, they are responsible for counterparty management.
- They have easier Access to the entity's insider information.
- They handle financial resources and are charged with handling bank accounts.

4.4 Constitution of Easement, Purchase, Sale and Leasing of Real Estate:

For the Constitution of Easement, Purchase, Sale and Leasing of Real Estate related with the operations of the **Company, TGI** via the Sustainable Development Division and with support from the Land Management Division shall keep the following controls:

4.4.1 Constitution of Easements:

All persons who have the ownership, possession or any other real right over real estate over which **TGI** must constitute rights of way as easements shall be validates in Restrictive Lists and, in case of matches, a report shall be prepared on the possible legal, reputation, operational or contagion risk that may arise from the encountered situation, regardless of whether or not it is reported to the FIAU, should it be required at all.

Additionally, the Land Management Division shall keep the following controls before carrying out the Constitution of Easement process:

- The following documents on the real estate are requested: Certificate of Property History and property deeds.
- A study of the property deeds to evidence possible Alert Signs related with Asset Laundering and Terrorist Financing.
- Request the Compliance Officer to verify Restrictive Lists for presence of the owner or person holding rights over the real estate that is to be a contractual party with **TGI**, leaving the appropriate evidence of the process. In case of legal entities, there must be a verification of the natural and legal entities included in the Certificate of Existence and Legal Representation. If any negative information unrelated with source crimes of AL/FT is found on the real estate or the owner, holder of rights, holder or occupier with which **TGI** is to enter a given contractual relation for the constitution of an easement or damages recognition, a reinforced due diligence process shall be initiated. If no matches are found but there are doubts, indications or suspicion regarding the good's legality or history, the reinforced due diligence process shall also have to be initiated.

In the event of matches of the consulted persons in the Restrictive Lists of the OFAC and UN and the lists of source crimes for **AL/FT**, the Compliance Officer shall inform this fact to the FIAU and the Ethics and Compliance Committee shall be called upon to determine the subsequent steps.

4.4.2 Purchase of Real Estate:

For the Purchase of Real Estate, the following documents related with the real estate object of the contract shall be requested and evidence of the process shall be documented:

- Certificate of property history
- Property deeds.
- A visit to the vendor of the real state.
- A study of the property deeds to evidence possible Alert Signs related with Asset Laundering and Terrorist Financing.
- The current owner and all previous owners as per the Certificate of property history are verified in the Restrictive Lists. In cases of legal entities, the Legal Representative, members of the Board of Directors and Shareholders with ownership of 5% or more of the share capital are also verified.
- An appraisal is made to verify that the good's intended price corresponds to the market price.

- The contract clauses on compliance with norms on control of **AL/FT** shall include a text that allows to know the origin of the resources of the individual and/or legal entity.
- If any negative information unrelated with source crimes of AL/FT is found on the real estate or the owner, holder of rights, holder or occupier with which TGI is to enter a given contractual relation for the constitution of an easement or damages recognition, a reinforced due diligence process shall be initiated. If no matches are found but there are doubts, indications or suspicion regarding the good's legality or history, the reinforced due diligence process shall also have to be initiated.

In the event of matches of the consulted persons in the Restrictive Lists of the OFAC and UN and the lists of source crimes for AL/FT, the Compliance Officer shall inform this fact to the FIAU and the Ethics and Compliance Committee shall be called upon to determine the subsequent steps.

4.4.3 Sale of Real Estate:

For the Sale of Real Estate, the following activities shall be carried out and all evidence of the process shall be documented:

- The buyer of the good verified in the Restrictive Lists. In cases of legal entities, the Legal Representative, members of the Board of Directors and Shareholders with ownership of 5% or more of the share capital are also verified.
- The contract clauses on compliance with norms on control of **AL/FT** shall include a text that allows to know the origin of the resources of the natural and/or legal entity.

In the event of matches of the consulted persons in the Restrictive Lists of the OFAC and UN and the lists of source crimes for AL/FT, the Compliance Officer shall inform this fact to the FIAU and the Ethics and Compliance Committee shall be called upon to determine the subsequent steps.

4.4.4 When TGI is the Landlord:

In the event that **TGI** requests the lease of a given real estate, office or other property for its operational use, the Human Resources and Services Vice-presidency with the support of the Physical Resources Management and/or whichever division or person that may be relevant, will perform the following activities and document the evidence of the process:

- The Compliance Officer verifies the landlord in the Restrictive Lists. In cases of legal entities, the Legal Representative, members of the Board of Directors and Shareholders are also verified.
- The contract clauses on compliance with norms on control of **AL/FT** shall include a text that allows to know the origin of the resources of the natural and/or legal entity.
- The lease contract must be signed by the respective natural person or by the Legal Representative or proxy of the corresponding legal entity, as the case may be.

In the event of matches of the consulted persons in the Restrictive Lists of the OFAC and UN and the lists of source crimes for AL/FT, the Compliance Officer shall inform this fact to the FIAU and the Ethics and Compliance Committee shall be called upon to determine the subsequent steps.



4.4.5 When TGI is the Landlord:

In the event **TGI** leases any real estate of its property, the Sustainable Development Division and with support from the Land Management Division shall perform the following activities and leave documented evidence of the process:

- The Compliance Officer verifies the tenant in the Restrictive Lists. In cases of legal entities, the Legal Representative, members of the Board of Directors and Shareholders with ownership of 5% or more of the share capital are also verified.
- The contract clauses on compliance with norms on control of **AL/FT** shall include a text that allows to know the origin of the resources of the natural and/or legal entity.
- The lease contract must be signed by the respective natural person or by the Legal Representative or proxy of the corresponding legal entity, as the case may be.

In the event of matches of the consulted persons in the Restrictive Lists of the OFAC and UN and the lists of source crimes for AL/FT, the Compliance Officer shall inform this fact to the FIAU and the Ethics and Compliance Committee shall be called upon to determine the subsequent steps.

In all contracts signed by virtue of the previous paragraphs, there shall be clauses where the Supplier, Tenant, Landlord and Easement certify that they are not related with any criminal process of Asset Laundering or Terrorist Financing, and that they are not included in any restrictive list on these topics, and that **TGI** will timely be informed if such an event ever arose. This document must be signed by the respective natural person or by the legal representative or proxy of the corresponding **Company**, if applicable.

In cases of delivery of real estate belonging to **TGI** to third parties within the framework of lease, bailment or any other legal figure, the contract shall include a clause authorizing TGI to visit the real estate every three (3) months so as to confirm its use in compliance with the terms set forth in the contract, the functionality of the public services and the due execution of major repairs or other obligations on behalf of the other party.

4.5 Applicable Controls for Handling and Supporting Communities

For the process of support to communities, the area charged with such end shall carry out the following controls to minimize the risks of Asset Laundering and Terrorist Financing:

- a) The Compliance Officer shall verify all natural and legal entities with which contracts, agreements and other documents are signed in the Restrictive Lists. In cases of legal entities, the Legal Representative, members of the Board of Directors and Shareholders with ownership of 5% or more of the share capital are also verified.
- b) The counterparty's acknowledgement form shall be delivered in order to document the information on the individual or legal entity with whom the contract is going to be signed with, so as to allow a better knowledge of them.

In the case of natural persons, it must at minimum contain the following information:

- Full names and last names
- Identification type and number
- Place and date of birth

- Address, telephone number and residence
- Occupation, trade or profession
- Main economic activity and its description

For legal entities, it must include at minimum the following information:

- Name or business name
- Tax identification number of the company
- Full name and last name of the legal representative
- Identification type and number of the legal representative
- Domicile of the company
- Address and telephone of the company

- c) The contractual minutes shall include clauses related with prevention of **AL/FT** in order to minimize legal or reputation risks derived from these crimes.

Paragraph: In the event of matches of the consulted persons in the Restrictive Lists of the OFAC and UN and the lists of source crimes for AL/FT, the Compliance Officer shall inform this fact to the FIAU and the Ethics and Compliance Committee shall be called upon to determine the subsequent steps.

4.6 Applicable Controls for Client Linkage:

For clients that are not households (large clients and others) a linkage form is delivered, containing fields to collect at minimum the following information:

- Full name and last name or business name
- Identification number.
- Group and subsidiaries.
- Share capital.
- Equity.
- Monthly income and expenditures.
- Annual turnover.
- Percentage of turnover in the gas and energy sector as well as in other sectors.
- Description of the economic activity (in compliance with the ISIC).
- Identification of shareholders holding 5% or more in the share capital.
- Request of the following supporting documents:
 - Last available official financial statements.
 - Organizational chart.
 - Certificate of Existence and Legal Representation with a validity of no more than three months.
 - Three commercial and financial entity-issued references.
 - Registry of a visit to the facilities.
- Delivery of the form of origin of goods and funds by the client. In this document, the supplier must also certify that they are not linked with any criminal processes of Asset Laundering or Terrorist Financing nor are they included in any restrictive list on the subject. The present document must be signed by the Legal Representative.
- Request of update of the information supplied in the linkage form and its respective annual supports.

- Verification of the client (Legal Representative, members of the Board of Directors and Shareholders with ownership of 5% or more of the share capital) in the OFAC's SDN List before the linkage, with evidence of the process.
- Verification of the client (Legal Representative, members of the Board of Directors and Shareholders with ownership of 5% or more of the share capital) in the List of Terrorists issued by the United Nations' Security Council before the linkage, with evidence of the process.
- Verification of the data supplied in the linkage form with the support documents supplied by the client.
- Confirmation of the data supplied by the client in the linkage form and leaving evidence of the process.
- Verification of the client (Legal Representative, members of the Board of Directors and Shareholders with ownership of 5% or more of the share capital) in search engines and press before the linkage in order to determine if there is negative or unfavorable information on the supplier, leaving evidence of the process.

5. Integration of the CSPAL with the Code of Good Corporate Governance and the Code of Ethics:

The System implemented to prevent and control the risk of Asset Laundering and Terrorist Financing by **TGI** is integrated with the Code of Good Governance of **TGI**. This way, the implemented controls must be applied by all Company collaborators. Likewise, the adopted system is in line with the corporate values contained in the Code of Ethics of **TGI**.

6. Handling of Conflicts of Interest:

TGI's administrators and collaborators are faced with a conflict of interest when they need to make a decision or perform or omit an action due to their functions, and have the possibility to choose between **TGI's** interest and their own or that of a third party.

At **TGI** there shall be a conflict of interest related to Asset Laundering and Terrorist Financing, among others, in the following situations:

- a) **Detection and Analysis of unusual operations and study report on suspicious operations:** When the operations have been used by spouses or permanent companions, familiars within the second degree of consanguinity, second degree of affinity or first degree of civil relation, or in operations where the person charged with performing the analysis holds any personal interest in or intends to take advantage of another person.
- b) **Reports:** When conflicts of interest arise during decision-making for the preparation of a report on behalf of the person preparing the report, or in cases of operations made by spouses or permanent companions, familiars within the second degree of consanguinity, second degree of affinity or first degree of civil relation

In case of conflict of interest, the same must be communicated to the immediate superior or to the Compliance Officer or via the Ethical Channel.

Collaborators who infringe the policies and procedures contained herein shall be subject to sanctions in accordance with the rules set forth in the Company's internal working regulation and other related dispositions.



7. Payments to Third Parties and Purchase of Foreign Currency

Payments are exclusively made via check or bank wire addressed solely to the payment's beneficiary. TGI shall only purchase foreign currency via the regulated market.

8. Organizational Structure and Control Organs

TGI's organizational structure for managing, preventing and controlling the Risk of Asset Laundering and Terrorist Financing is as follows:

- Board of Directors.
- Legal Representative
- Compliance Officer
- Tax Inspector or Acting Tax Authority
- Collaborators

The collaborators, control organs and third parties have as their main role the responsibility to protect the **Company** from exposure to **AL/FT**, always complying with the implemented control policies, procedures and measures, to avoid **TGI** from being used as a tool to hide, handle, invest in or take advantage of money or any other goods derived from criminal activities, or to give legal appearance to such criminal activities or to the transactions and funds linked with them.

9. Functions for the Prevention of AL/FT

9.1 Board of Directors

In the development of the function established in paragraph 37 of the Articles of Association of the Company, the Board of Directors shall have the following faculties regarding AL/FT:

- Set forth the policies for the prevention and control of Asset Laundering and Terrorist Financing.
- Approve the **CSCAL** Manual and its updates.
- Approve the mechanisms and instruments that make up the Company's **CSCAL**.
- Designate the Compliance Officer.
- Have knowledge of each of the points contained in the reports prepared by the Compliance Officer, leaving express evidence in the respective minutes.
- Have knowledge of the reports presented by the fiscal auditor and follow up on the adopted observations and recommendations, leaving express evidence in the respective minutes.
- Create the necessary technical and human resources to implement and maintain the **CSCAL** Manual functional.

9.2 Legal Representative

The legal representative shall have the following functions:

- Verify that the procedures established for the Prevention of Asset Laundering and Terrorist Financing develop the policies approved by the Board of Directors.

- Create the necessary technical and human resources to implement and maintain the **CSCAL** Manual functional.
- Submit the **CSCAL** Manual and its updates before the Board of Directors or the organacting in its capacity.
- Provide effective, efficient and timely support to the Compliance Officer.

9.3 Compliance Officer

The Compliance Officer shall be designated by the Board of Directors and the FIAU informed of its designation within the next 15 calendar days, providing the Official's name, identification number, position and hierarchical level. The El Compliance Officer will have decision powers, the necessary time to develop their functions and the support of a human and technical work team that allows them to properly fulfill their operations. The El Compliance Officer shall have the following functions:

- Ensure the effective, efficient and timely functioning of the **CSCAL**.
- Present, twice a year, reports to the Board of Directors where they must address the following topics, at minimum:
 - The results of the management.
 - Compliance in relation with the delivery of reports before the different authorities.
 - The effectiveness of the established mechanisms and instruments, as well as of adopted measures to correct the flaws in the self-control system to prevent **AL/FT**.
 - The results of the corrective measures ordered by the Board of Directors.
 - The results of the placement each time the validity of the respective public offerends.
 - A report regarding the control of **AL/FT** on wires made in the secondary market, if applicable.
- Present to the legal representative the requirements of computing, technological, physical and human resources necessary for the fulfillment of their functions.
- Inform about all documents and statements from the control entities within the FIAU.
- Promote the adoption of corrective measures to the system.
- Evaluate the reports presented by the fiscal auditor and adopt the necessary measures regarding the informed deficiencies.
- Meet and coordinate the performance and delivery of all requirements, requests or procedures that need to be made before the competent legal or administrative authority on this subject.
- Coordinate and program alongside the Human Management Division the training plans on the **AL/FT** Prevention System addressed to all of the **Company's** collaborators, including the Board of Directors and the fiscal audit.

The appointment of a Compliance Officer does not release the **Company** or the other collaborators from their obligation to detect and internally report unusual operations and to determine suspicious operations and report them before the FIAU.

9.4 Tax Inspector or Acting Tax Authority

The Tax Auditing must implement the controls allowing it to detect infringements of the instructions issued by the competent authorities on the subject. Said



management includes the assessment of the functions of the entity's Compliance Officer regarding the **CSCAL**.

The report by the Fiscal Auditor to be presented to the highest organ of the Company and to the Compliance Officer must include the conclusions of the evaluation process of the norms on the prevention and control of **AL/FT**.

9.5 Collaborators

All Collaborators of **TGI** shall be obligated to follow internal policies and to adopt behaviors that show compliance with the law, including those referring to Asset Laundering and Terrorist Financing. Any collaborators that infringe the policies and procedures contained in this Manual shall be subject to sanctions as established in the Internal Working Regulation and other related dispositions.

All collaborators must place the compliance with ethical norms and norms on the Prevention of the Risk of Asset Laundering and Terrorist Financing before the achievement of the strategic objectives.

Have an ethical and diligent behavior in their compliance with norms on the Prevention of the Risk of Asset Laundering and Terrorist Financing that the law, the control entities and the **Company** have set forth.

Comply with norms on the Prevention of Asset Laundering and Terrorist Financing as part of the achievement of the **Company's** objectives.

Inform about any operation that may be catalogued as unusual to their immediate superior or to the Compliance Officer.

10. Control Areas:

10.1 Internal Audit

The Internal Audit Division is responsible for:

- Verifying the adequate execution of projects, procedures and controls regarding the AL/FT risk management system, determining its deficiencies and their possible solutions.
- Inform the results of the assessment to the Board of Directors, the Legal Representative and the Compliance Officer so that the corresponding analysis are carried out and that the necessary corrections by the involved areas are adopted, so that during the subsequent follow up the treatment plans to eliminate or correct flaws are properly corrected or prepared.

10.2 Financial Vice-presidency

The Financial Vice-presidency is responsible for:

- Have knowledge on the shareholders in compliance with what is set forth in the AL/FT prevention manual, in those cases where **TGI** carries out Direct Placement of Stocks.



- When negotiations for the securities issued by **TGI** are made via a stock- broking Company and/or other intermediary from the stock market, which are entities under surveillance of the Financial Superintendence of Colombia, the Financial Vice-presidency is charged with the application of the **SARLAFT** system on this kind of operations and/or shareholders.
- That the manager of the shareholders' books and keeper of the securities sends the Compliance Officer the **AL/FT** prevention certificate on the Shareholders.

10.3 Strategic Supply Division

The Strategic Supply Division is responsible for:

- Establishing contract clauses in all contracts signed by **TGI** for the Prevention of **AL/FT**.
- Carry out the assessment of the suppliers considering, among other aspects, what is included in the present Manual.

10.4 Human Management Division

The Human Management Division is responsible for:

- Carry out the assessment of **TGI's** collaborators before their recruitment and during their permanence in the **Company**, in compliance with what is set forth in the present Manual.
- In the specific case of loans and benefits to employees, this Division shall know the beneficiary third party.

10.5 Land Management Division

The Land Management Division is responsible of:

Knowing all easements as established by the present manual as well as by other procedures established within the **Company**.

10.6 Additional Controls (Other Processes)

Each time a new business is closed, a new product is released or transactions including payments are made, the responsible area shall request the Compliance Officer to verify the Restrictive Lists of natural and legal entities in compliance with what is set forth in the present Manual.

11. Attention to Information Requests on Behalf of the Competent Authorities on Asset Laundering and Terrorist Financing:

Collaborators who receive information requests from the competent authorities on the topic of Asset Laundering and Terrorist Financing shall deliver such requests to the Compliance Officer, who shall check if the person or persons consulted in the document have or had any relation with Compañía de Energía de Bogotá.

The Compliance Officer may request support from the Legal and Regulatory Vice- presidency for the review of the respective answer in order to prepare and deliver the answer to the requirement within the term set forth in the request.

If any of the required persons has any relation with Transportadora de Gas Internacional, the activities stated in this manual shall be put in motion. The requirement, the sent answer and the required supports are then filed in the area of the Compliance Officer.

The answer shall be signed by the legal representative.

12. Detection of Unusual or Suspicious Operations:

The Detection of Unusual or Suspicious Operations for the different Groups of Interest shall be carried out as follows:

Each process owner shall analyze their process and any infringement that may be directly or indirectly related with Asset Laundering or Terrorist Financing must be immediately reported to the Compliance Officer, who will then determine whether or not the event can be catalogued as suspicious.

The Compliance Officer or whoever he appoints shall carry out the validations in Restrictive Lists requested by each area before their linkage with TGI and in case any information related with **AL/FT** and/or their source crimes, this shall be reported to the FIAU in accordance with the defined objective causes applicable to the different Groups of Interest other than shareholders that enter into commercial relations with the **Company**.

13. Reports

These reports aim to guarantee the functioning of the risk control procedures included in the present Manual, as well as the compliance with the legal duty to collaborate with the competent authorities on the fight against criminal activity.

13.1 Internal Reports

13.1.1 Internal Reports on Unusual or Suspicious Operations

As long as a collaborator of **TGI** in the development of their functions detects an Unusual and/or Suspicious Operation, they shall report it immediately to the Compliance Officer via the delivery of the internal report on suspicious operations form (RIOS in Spanish) to their immediate superior who, in turn, shall inform the fact to the Compliance Officer so the respective analysis can begin.

The document by which an unusual transaction is reported shall contain:

- The date of the report.
- The collaborator that prepared it.
- The name and identification number of the counterparty in question.
- A clear description of the unusual and/or suspicious operation.

- Additional observations.

13.2 External Reports

13.2.1 External Reporting of Suspicious Operations

Regarding all Suspicious Operations, including those that were not completed but were attempted, their immediate and direct report before the FIAU shall proceed. For the effects of the RSO, all that is necessary is for the entity to consider an operation suspicious. As the RSO does not constitute a criminal complaint, it does not need to be signed.

13.3 Objectives Causes for Reporting before the FIAU and Interest Groups Other than Shareholders

The following operations shall be causes of Report of Suspicious Operations:

- The inability to clearly identify through public information the motive of the presented unusual situation.
- Individuals or legal entities found in the OFAC or UN Lists; if they are mentioned in a list by the General Prosecutor's Office this shall be an objective cause as long as the situation relates to crimes of Asset Laundering, Terrorist Financing, proliferation of weapons of mass destruction or a source crime of Asset Laundering.
- If by news known to the Compliance Officer an individual or legal entity linked or about to be linked with **TGI** is involved with Crimes Leading to Asset Laundering, Terrorist Financing and/or proliferation of weapons of mass destruction.
- False or misleading information that when compared with public information it is determined that it was intended to hide Asset Laundering, Terrorist Financing and/or proliferation of weapons of mass destruction during the process of linkage as a counterparty of **TGI**.

13.4 Reporting of Cash Transactions

When there is an issuing and placement of stocks by **TGI** in the primary market, once the corresponding placement period ends a report shall be sent to the FIAU reflecting the cash transactions when the value of which is equal or superior to ten million Colombian pesos (COP 10.000.000) if the transaction is in national currency, or to five thousand American dollars (USD \$ 5.000) or its equivalent in other currency in compliance with the representative market rate of the day when the operation is made.

The aforementioned report shall be sent in the form designed for such an effect by the Financial Superintendence of Colombia.

All information requirements on behalf of the competent authorities on prevention and control of Asset Laundering and Terrorist Financing shall be covered by the Compliance Officer who shall gather all the necessary information and answer the requirement within the set period.

14. Retention of Documents Related with the Comprehensive System for the Prevention and Control of Asset Laundering and Terrorist Financing:

All registries and documents generated in the development of the policies and procedures contained in the present Manual shall comply with the criteria of integrity, reliability, availability,



compliance, effectiveness, efficiency and confidentiality of the information contained therein and shall be kept in compliance with the norms governing the keeping of trade books and documents.

In order to guarantee the greatest degree of collaboration with the authorities, **TGI** shall keep the documents and registries relative to the compliance with the norms on prevention and control of Asset Laundering and Terrorist Financing for a five-year period upon its creation date. The documents supporting the decision to determine an operation as suspicious, as well as its respective support, are kept by the Compliance Officer in a centralized and chronological way with the due security measures.

The Compliance Officer shall keep all documents digitally to support the associated information in the subject of prevention **AL/FT** in the web folder designated for such an end. That folder shall be available to the different control entities when required.

15. Reserve of Information

In compliance with what is set forth in Arts. 102 through 105 of the EOSF, all information received, handled or reported by virtue of what is established in such articles and in this Chapter is subject to and may only be used for the ends foreseen in the legal norms, especially the information related with section d. of paragraph 2. of art. 102 of the EOSF.

16. Disciplinary Regime:

It establishes the disciplinary sanctions for infringement of the norms related with the system for **AL/FT** risk management, as well as the processes for its imposition. The

processes to which sanctions are applied to are:

- Controls and procedures which are not complied with.
- Inadequate execution of control procedures.
- Mistakes in information gathering and verification.

For all effects, **TGI** shall apply the current Internal Working Regulation.

17. Updating of the Manual for the Prevention of AL/FT:

- Each time the need to modify or update the Manual is determined, the responsible person proceeds to write the text that needs to be modified or added.
- Once the new text is ready, it is brought before the Compliance Officer for review.
- After modifying or adding the Manual update proposal for the prevention of **AL/FT**, the Compliance Officer proceeds to present the proposal before the Board of Directors for its approval.
- In case the Updating of the Manual for the Prevention of AL/FT approved by the Board of Directors merits an update of the present procedure, the Compliance Officer shall appoint the staff charged with the required update.

18. Training:

In order to promote a culture of Self-control and Management of the prevention of Asset Laundering and Terrorist Financing, so that collaborators may analyze and detect attempted, unusual or



suspicious operations in order to avoid TGI be used as an instrument to perform activities outside the law.

18.1 Training Objectives:

- Generating awareness and participation from all collaborators of **TGI** for the prevention of risk of Asset Laundering and Terrorist Financing.
- Developing and strengthening the organizational culture regarding the Risk of Asset Laundering and Terrorist Financing among all collaborators of **TGI's** administrative and technical areas.
- Coordinate with the Human Resources and Services Vice-presidency the necessary training for the collaborators, in accordance with the entity's established induction and training program.
- Define a training plan that guarantees the correct execution of the System for the Prevention of Asset Laundering and Terrorist Financing – **SARLAFT** by the collaborators of **TGI's** administrative, technical and managerial areas of the **Company**, in compliance with the induction and training program.
- Guaranteeing that during the induction process there is training on the Risk of Asset Laundering and Terrorist Financing by the Compliance Officer to the new employees and collaborators of **TGI's** administrative and technical areas in compliance with the induction and training program.
- Perform periodic training to keep the staff of **TGI's** administrative and technical areas up to date on the **AL/FT** self-control and risk policy as per the induction and training program.

18.2 Scope of the Training

Training is intended for **TGI's** collaborators and will be performed annually.

The Compliance Officer may invite to the training sessions the different Groups of Interest they consider pertinent.

Preparation and execution of the annual training plan: Annually, the Compliance Officer alongside the Human Resources and Services Vice-presidency design the training plan on prevention of Asset Laundering and Terrorist Financing for the collaborators of the **Company**. The plan contains the following points, at minimum:

- Collaborators who will receive training during the year.
- Content of the talk to be given to each collaborator group bearing in mind their functions in the subject of the system for **AL/FT** risk and charges.
- Means to execute each session: on-site, via the intranet or via web.
- Way to evaluate the attending audience's reception.
- Number of sessions, attendance to each of them and months of the year when they will be held.

Once the plan is designed it is discussed with each of the implicated areas to reach an agreement on the dates depending of the available time.



After defining the dates and the training plan for the year is complete, it is presented for its approval before the Board of Directors in the Compliance Officer's work program.

Once the plan is approved by the Board of Directors, it is executed in accordance with what is established. In case of changes to the dates, they are done before the execution of the sessions.

19. Monitoring and Follow-up on Operations:

Twice a year the report on **AL/FT** prevention activities is presented before the Board of Directors. This report contains the following topics, among others:

- Resultados de la gestión desarrollada.
- Compliance of reports before regulatory authorities and entities.
- Effectiveness of the mechanisms and instruments established in the **CSCAL**, Results of the corrective measures ordered by the Board of Directors or the body acting in its capacity, when applicable.
- The results of the placement each time the validity of the respective public offer when applicable.
- A report relating with the control of the wires made within the secondary market, if applicable.
- Documents and statements issued by the controlling entities and of the FIAU.

20. Support Systems for the System for the Prevention of AL/FT: TGI has the

following tools supporting the work of the Compliance Officer:

- Tool for the validation of restrictive lists to consult natural and legal entities individually, via the internet.
- Enterprise Risk Assessor (ERA): This software is a tool that provides all technical support for the design and implementation of the AL/FT Risk Management model, with the compliance of international standards.
- Tools such as Excel or tools available in the market to complement their analysis.

21. Consulting Committee on Topics Regarding AL/FT

The **Company** possesses a Committee of Ethics and Compliance the main objective of which is to contribute with the strengthening of ethical behavior within **Company**, as well as to implement coordinated actions in face of event of behaviors that go against what is established in the Code of Ethics and verify the implementation and follow up on the **Company's** established compliance program.

The Committee is made up by the following members:

- Internal Audit Manager
- Vice-president of Human Resources and Services
- Corporate Issues and Subsidiaries Manager

When the subjects to be discussed are exclusively on **AL/FT**, invitations are extended to:

- The Legal and Regulatory Vice-presidency Litigation Management.

- The Vice-presidents, Directors and/or Managers of the areas involved in the process.
- Other collaborators and/or third parties that are considered pertinent.

22. Responsibilities of the Committee regarding the Prevention of AL/FT

- Gather every time it is convened to analyze and review any kind of information related with **AL/FT** when it is considered that the **Company** could incur in any kind of risk.
- Study the different suspicious or unusual operation reports from any area within **TGI** and/or third party that it may detect.
- Duly document the analysis and conclusions derived from each meeting of the committee. To such effect, each meeting shall be properly documented in minutes that shall comply with all the requirements established by the Code of Commerce and will be signed by the attendees. The copies of each minutes shall be delivered to the Chairman of the **Company**.
- Resolve any conflict of interest that may arise on the subject of Asset Laundering and Terrorist Financing in the **Company**.

23. Alert Signs

Now follows a list of alert signs the collaborators must bear in mind in order to detect suspicious operations:

23.1 Alert Signs for Shareholders:

- Performing operations that do not correlate with their economic capacity according to the information available at **TGI**.
- Supplying false, difficult to verify or insufficient information.
- Simultaneous operations in different accounts and in the same offices related with the purchase and sale of **TGI** securities.
- Refusing to reveal information on their social object or other data supplied in the Knowledge by the Shareholder form.
- Presenting a disproportionate growth in the shareholder's operations.
- Presenting frequent changes in the shareholder's economic activity, address, telephone number or social object.
- Developing activities different from those of the social object for which the **Company** was created.
- Registering the same citizenship card or NIT number as a different shareholder of **TGI**.
- Registering the same address and/or telephone as other shareholders with whom they haveno apparent relation.
- Having a disconnected phone or number when doing the verification call, information doesnot match the one initially provided.
- Delivering the forms with illegible handwriting.
- Showing reserve regarding updating relevant information.
- Showing reserve regarding the delivery of information on the origins of their funds or equity.

23.2 Alert Signs for Individuals or legal entities:

- Acting on behalf of third parties trying to hide the identity of the real client or user.
- Having a disconnected phone or number when doing the verification call, information does not match the one initially provided.
- Fractioning transaction to avoid replying to requirements of documentation and/or presentation of a statement of operations in cash.
- Persons who pressure any collaborator of **TGI** not to deliver forms that imply duly registering or reporting the operation.
- Possessing great economic solvency while simultaneously having great difficulty to acquire references or co-signers.
- Carrying out operations in amounts or values that do not align with their economic activities.
- Registering the same address and/or telephone as other persons with whom they do not have any apparent relation.
- Frequently changing their information, such as their address, telephone number, occupation, etc.
- Suddenly and inconsistently changing their transactions and ways to handle their money.
- Defining their economic activity as “independent” and handling large amounts of money.
- Refusing to back an operation or to update basic information.
- Attempting to carry out operations with counterfeit money.
- Delivering forms with illegible handwriting.
- Demanding to be seen by or showing a pronounced preference for a specific commercial consultant within the Company.
- Supplying false, difficult to verify or insufficient information.
- Acting with reserve or irritation when requested to provide the due identification or the delivery of mandatory forms to carry out certain kinds of operations.
- Acting nervously when asking them for the required operation, doubting their answers and/or bring the requested information already written down.
- Offering products or services for prices below normal market costs, or at purchase prices higher than the usual market prices.

24. Economic Activities with the Highest Risk regarding Asset Laundering and Terrorist Financing

- Stock brokers
- NGOs
- Religious communities
- Foundations and Corporations (Non-profit)
- Residential Units and Malls
- Sea and Shipping Lines
- Construction and architecture
- Car dealerships
- Auto part vendors
- PEPs
- Exchange Houses
- Exchange professionals
- Check cashing facilities
- Jewelry and precious stones vendors
- Casinos and gambling establishments
- Manufacture, trade and distribution of chemical products
- Hotels and motels
- Marketers of works of art
- Pharmaceutical labs

- Transportation companies
- Travel agencies
- Used vehicles dealers
- Pawnshops
- Agricultural and livestock activities
- Special exporters and importers
- Aerial shipping services
- Money desks
- Trade and distribution of computer equipment
- Social clubs
- Football clubs and other sporting activities
- Non-financial cooperatives
- Fuel trade and distribution
- Scrap metal trade and distribution
- Security and surveillance companies
- Butcher shops
- Legal / accounting activities
- Fishing activities
- Political parties and organizations
- Shelters
- Temporal Exchange professional

25. Crimes Conducive to Asset Laundering:

- Migrant trafficking.
- Trafficking in persons.
- Extortion.
- Illicit enrichment.
- Extortive kidnapping.
- Rebellion.
- Trafficking in weapons.
- Trafficking in minors.
- Terrorist Financing and administration of resources related with terrorist activities.
- Trafficking of toxic, narcotic or psychotropic drugs.

Crimes against the Financial System, such as:

- Undue use of resources obtained from the public.
- Unauthorized operations with shareholders or associates.
- Massive and usual money capture.
- Fraudulent manipulation in kind entered into the national securities and issuers registry.

Crimes against the Public Administration, such as:

- Graft.
- Omission of the withholding or collecting agent.
- Destination of treasury resources for the undue stimulation or benefit of exporters or dealers of precious metals.
- Illegal exaction.
- Bribery.

- Undue signing of contracts.
- Illicit enrichment of a public official.
- Crimes executed under Association to commit a crime.

26. Crimes Conducive to Terrorist Financing

- Migrant trafficking.
- Trafficking in persons.
- Extortion.
- Extortive kidnapping.
- Rebellion.
- Trafficking in humans.
- Terrorist Financing and administration of resources related with terrorist activities.
- Trafficking of toxic, narcotic or psychotropic drugs.

Crimes against the Financial System, such as:

- Undue use of resources obtained from the public.
- Unauthorized operations with shareholders or associates.
- Massive and usual money capture.
- Fraudulent manipulation in kind entered into the national securities and issuers registry.

Crimes against the Public Administration, such as:

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- Undue signing of contracts.
- Illicit enrichment of a public official.
- Crimes executed under Association to commit a crime.