

Policy to Prevent Money Laundering



Policy to **Prevent Money Laundering**

1. Purpose:

This Policy establishes the principles, procedures, and rules to protect the **Company** and its **Associates** against risks due to the use of resources of illicit origin, also known as **Money Laundering**.

2. Scope:

This Policy is **General**, that is, it is applicable to all the **Associates** of the various **Subsidiaries** business units in all the countries and regions where Arca Continental operates.

3. Definitions:

Associate means every person who is employed by Arca Continental or any of its **Subsidiary** businesses or who is part of any of its boards or other management bodies.

Company means Arca Continental, S.A.B. de C.V. or its **Subsidiaries** or business units in all the countries and regions where Arca Continental operates.

Compliance Officer means the Arca Continental official in charge of the **Ethics and Compliance System**. You can contact the Compliance Officer through the following means: for Coca-Cola Southwest Beverages: COBC@cocacolaswb.com; for Wise and other operations: integridad.etica@arcacontal.com

Due Diligence means the investigation of relevant background and information (such as litigations, sanctions, public profile, positions and jobs, and commercial and political activities) of a company or person, in the context of their hiring or the maintenance of a commercial relationship, or of any other nature, to identify potential risks of **Money Laundering** or of another nature.

Ethics and Compliance System means the coordinated set of policies, controls, procedures, and corporate bodies, designed to comply with our Code of Ethics and Corporate Policies, administered by the **Compliance Officer**.

Exposed Areas means the functional areas or business units that participate in **Vulnerable Activities** or that are otherwise exposed to high risks of **Money Laundering**.

Money Laundering means the process through which the origin of funds or assets obtained through illegal activities is concealed, so that they appear as the result of legitimate activities

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and circulate without problem or suspicion in the financial system. If successful, it allows criminals to maintain control over such money and use the money in the regular economy.

In practice, **Money Laundering** operations usually involve bank accounts in countries with little supervision, the use of name foremen or shell companies, multiple intermediate layers, among other mechanisms.

Money Laundering is a serious crime that can result in serious legal, economic, and reputational damages—including imprisonment—both for the **Company** and its **Associates**.

Responsible Areas means the entities within the Company that are responsible for developing or applying controls, procedures, protocols, criteria, and other measures to implement the provisions of this Policy, viz., the Fiscal, Internal Control, Audit, and Legal areas.

Risk Criterion means the identification and analysis that is carried out to determine the relative risk that a third party and/or a specific activity could use Arca Continental or any of its Subsidiaries for Money Laundering purposes.

Subsidiaries means business units or companies belonging to Arca Continental, in which Arca Continental, S.A.B. de C.V. is the direct or indirect holder of over 50% of the share that comprise its capital stock.

Transparency Mailbox means the channel managed by an expert, independent third party, to receive and channel complaints and queries related to our Code of Ethics and General Policies, referred to in Section 7 of this policy "Doubts and Complaints".

Vulnerable Activities means the operations or activities of the **Company or its Associates** that represent a high risk of supporting or providing an opportunity for **Money Laundering**, as determined by criteria as established by applicable law or due to their intrinsic risk as evaluated by the **Responsible Areas**.

4. Policy Guidelines:

4.1 General Principles.

The Company is committed to conducting business only with reputable customers and third parties engaged in legitimate business activities with funds derived from legitimate sources. The Company has established policies, procedures and standards to protect itself from being used for money laundering, terrorism financing, or other illicit activities. All employees are expected to conduct themselves in accordance with the highest ethical standards and in full compliance with relevant laws, regulations and policy requirements.

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All Arca Continental **Associates** must avoid situations that may give rise to, encourage, conceal, or may be used for the purpose of **Money Laundering**. Associates must duly report any suspicious activities or circumstances through the **Transparency Mailbox** or by contacting the **Compliance Officer**.

In order to protect the **Company** and its **Associates** against **Money Laundering** risks, Associates must conduct themselves pursuant to the following guidelines:

- a. **Legality and Integrity**. Arca Continental operates with business integrity and in accordance with applicable law by, among other things, adopting measures to safeguard the legitimacy of resources that it receives from its customers and other counterparts.
- b. **Associates**, depending on their responsibilities and functions, must know and make use of these resources as appropriate.
- c. Risk Criterion. **Responsible Areas** must utilize risk criteria that are supported by legitimate and established methodologies consistent with risk management as identified by the Ethics and Compliance System and applicable regulations.
- d. Transparency. All Associates who participate in operations that could be exposed to Money Laundering risks or who have any questions about the application or interpretation of this Policy must consult with the local legal department or with Arca Continental's Compliance Officer about any potential concerns.
- e. Identification. **Responsible Areas** must maintain an updated record of **Vulnerable Activities** for their management and must identify **Exposed Areas** from time to time as they learn of them, as required by Law.

4.2 Individual Responsibility.

Associates must assure that their activities comply with applicable law, and must be vigilant about detecting potential Money Laundering, including by knowing the clients and counterparts with whom they interact in the performance of their duties.

Associates are strictly prohibited from participating or contributing to any type of illegal activity. Associates must promptly report any act that violates this Policy or threaten the legality and integrity of our operations, through the **Transparency Mailbox** or other available channels.

4.3 Red Flags

The following characteristics of the transacting counterparties are selected examples of "red flags" for potential anti-money laundering or other illicit activity's compliance concerns:

- A customer or transaction having connections to countries identified as non-cooperative with international efforts against money laundering;

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- Providing false or misleading information;
- Refusing to disclose the nature and source of funds/assets;
- A legal entity customer who refuses to identify a beneficial owner;
- A company that acts as the agent for an undisclosed principal;
- Providing an address that is not a physical site but rather is a P.O. Box;
- The apparent use of a shell company;
- An unusual or unexplained lack of concern regarding risks, transaction costs or penalties regarding a Company product or service;
- The apparent structuring of transactions to avoid government reporting requirements;
- A customer's request to engage in transactions with no or little business justification;
- A customer's request that funds be transferred to an undisclosed third party or a third party in another jurisdiction;
- Any transaction designed to evade taxes; or
- A transaction with no apparent economic, business, or lawful purpose.

4.4 Controls and Procedures.

- a. Identification and Classification of Operations. **Responsible Areas** must develop controls, procedures, criteria, and resources to identify, classify, and communicate to Associates the types of Company operations at risk of Money Laundering, with special emphasis on **Vulnerable Activities** and the **Exposed Areas**.
- b. Implementation and Notification of Operations. **Associates**, according to their responsibilities and functions, must know, incorporate into their areas, and use the processes and other controls, procedures, criteria, and resources developed by the **Responsible Areas** to identify, classify, and timely report the operations of the **Company** in accordance with this Policy.
- c. Due Diligence and Authorization Processes. The Commercial and Supply areas, in coordination with the Compliance Officer, must manage and administer the **Due Diligence** and other necessary processes to review and authorize, where appropriate, customers and other counterparts from whom resources are received and who may present risks related to **Money Laundering**.
- d. Revision and Updating. The **Responsible Areas** must develop and implement periodic reiteration processes to identify operations or situations (such as changes in laws, incursions into new markets or business areas, increase in crime rates, among others) related to **Money Laundering**, so as to incorporate them into the other controls and procedures under this Policy.
- e. Laws and Local Requirements. The **Responsible Areas** must establish communication channels and coordination mechanisms to assure that this Policy complies with applicable

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laws, regulations, practices, and other requirements of the regions and countries in which the **Company** operates.

- f. Investigations and Audits. The **Responsible Areas**, in coordination with external counsel as may be appropriate, must design and implement processes to conduct professional and objective investigations and audits of possible violations of this Policy. Said processes must be developed in the context of the general policies for handling complaints and investigating violations of our *Code of Ethics and Policies of Conduct* that are part of the **Ethics and Compliance System**.
- g. Traceability. To the maximum extent possible, depending on their responsibility and duties, **Associates** must avoid receiving or using cash (bills or coins) or other assets whose origin is difficult to trace or audit, in the exercise of their activities within the Company.

5. Vigilance and Compliance with the Policy:

The **Fiscal, Internal Control, Audit, and Legal** departments in all countries in which the Company operates, will be the main Areas Responsible for the administration and adoption of measures stipulated in this Policy and will be responsible for assuring compliance with and enforcement of this policy.

Said departments may consult with the **Compliance Officer**, who will have the support them for this purpose, about the scope of their responsibilities and shall consult with the Compliance Officer regarding any protocol, report, or other relevant document or information in relation to the foregoing.

6. Consequences or Sanctions for Lack of Compliance with the Policy:

Any breach of this policy must be reported to the Ethics and Compliance and Human Capital Directors. Failure to comply with the provisions of this policy by any of the responsible parties may result in discipline, up to and including termination of employment in accordance with the Code of Ethics of Arca Continental and any other applicable Law.

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Director responsible for the issue or update:	Ethics and Compliance Director

Any associate who reasonably suspects or becomes aware of conduct that deviates from this policy is encouraged to make a complaint to any manager or by any other means, including the Transparency Mailbox, through the following options:

1. The “Transparency Mailbox” on the corporate intranet or on the Arca Continental web page <https://www.buzondetransparenciaac.com/>
2. The toll-free phone lines:
 - In Argentina: 0800-345-2036
 - In Ecuador: 1-800-001-684
 - In the USA: 1-833-761-8291
 - In Mexico: 800-880-0754
 - In Peru: 0800-74684