

POLICY FOR AML/CFT/FPADM RISK MANAGEMENT

1. Objective

Establish the guidelines for Q-Vision Technologies S.A.S to prevent and mitigate the risks associated with Money Laundering (ML), Terrorism Financing (TF), and Financing of the Proliferation of Weapons of Mass Destruction (FP), in accordance with the applicable regulatory framework, to protect the interests of the company, its employees, and business partners.

2. Scope

This policy applies to all employees, executives, and third parties with a commercial or contractual relationship with Q-Vision Technologies S.A.S, covering its operations both nationally and internationally.

3. Commitment to Compliance

Q-Vision Technologies S.A.S is committed to complying with national and international laws and regulations on AML/CFT/FP prevention. The company promotes a culture of compliance that fosters awareness and adherence to applicable regulations, in line with the values of transparency and corporate integrity.

4. Due Diligence Principles

To ensure appropriate identification, assessment, and mitigation of AML/CFT/FP risks, Q-Vision Technologies S.A.S. implements the following due diligence principles:

- Know Your Customer (KYC): The company maintains procedures for the identification and verification of its clients, third parties, and business partners, ensuring they meet the required verification standards. Key risk factors evaluated for third parties include:

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- High-risk jurisdictions
 - High-risk economic sectors
 - Politically Exposed Persons (PEPs)
 - Source of assets and funds
 - Sanction lists
 - Legal proceedings
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- **Monitoring and Surveillance:** Q-Vision Technologies S.A.S conducts ongoing monitoring of transactions and business activities, identifying those that may present a potential AML/CFT/FP risk.

 - **Risk Analysis and Classification:** A risk analysis is conducted for each client and transaction to classify them according to their risk level (minimal, minor, moderate, and major). This enables the establishment of stricter controls on cases considered high-risk.

 - **Reporting of Suspicious Transactions:** All personnel are responsible for reporting any suspicious transaction or behavior through designated company channels, following internal procedures and applicable regulations. Criteria that may indicate suspicious activities include:
 - The client refuses to provide basic identification information or submits documents that appear falsified or altered.
 - Discrepancies exist between the information provided by the client and their financial behavior, or between their income and transactions.
 - The client performs transactions in amounts close to the limits requiring reports or additional verifications, suggesting an intentional division of transactions.
 - Funds are transferred between accounts in different countries or jurisdictions known to be high-risk for AML/CFT/FP without a clear commercial reason.
 - Sudden and unjustified changes in the client's transaction patterns, such as significant increases in transaction volume or frequency.
 - Clients insist on using unconventional payment methods, such as cryptocurrencies, without a valid commercial justification.
 - Transactions involve newly created suppliers or clients in the system, especially from countries with high corruption rates or considered high-risk.

Any information related to possible suspicious operations must be communicated to the Compliance Officer at eticamente@qvision.us.

5. Training and Awareness

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Q-Vision Technologies S.A.S implements ongoing training programs for its employees and executives on AML/CFT/FP risks and best due diligence practices, fostering a culture of prevention and compliance within the organization.

6. Continuous Assessment and Improvement

The company conducts periodic evaluations of its AML/CFT/FP Risk Management System to adjust and improve its procedures and controls according to risk evolution, industry best practices, and current regulations. The company follows the criteria established in Chapter X of the Basic Legal Circular from The Superintendence of Companies (Colombia) as a good business practice, along with the 40 recommendations of the FATF (Financial Action Task Force).

7. Responsibilities

Compliance with this policy is the responsibility of all members of the organization. The Compliance Department is responsible for coordinating efforts to prevent AML/CFT/FP risks, as well as for updating and disseminating this policy throughout the organization.

8. Sanctions for Non-Compliance

Failure to comply with this policy may result in disciplinary sanctions in accordance with the company's internal regulations, and in serious cases, relevant information may be forwarded to the appropriate authorities.

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