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1. PURPOSE

Money laundering and terrorist financing are risks to which the Company is exposed in the course of business. Inkia Energy is committed to combating and preventing this crime in all its operations.

Money laundering refers to the process through which the proceeds of a criminal activity are disguised to hide their illicit sources, and terrorist financing is the concealed support -financial or other, directly or indirectly- to terrorist organizations or those who promote or are involved in these activities.

Money laundering and terrorist financing have similar characteristics, mainly because they involve a cover-up, both of the illicit origin (money laundering) and of the source and final destination of the funds (terrorist financing), and affect the Company's integrity and image.

2. SCOPE AND APPLICATION

Inkia Energy Group companies are required to implement and comply with all policies and guidelines in force.

Likewise, contractors of the group companies are required to maintain the same spirit and intent of such policies and guidelines, by approving the provisions that apply to them according to the nature of their contract.

3. DEFINITIONS

WORD	DEFINITION
Money Laundering	<p>In general, it is the process of hiding or disguising the origin, procurement, existence, movement, destination, use and acquisition of capital or real or personal property, resulting from an illicit activity, to make them appear legitimate.</p> <p>The stages that define the activity are:</p> <p>a) Money Collection: Physical reception of cash from illicit activities.</p> <p>b) Placement: Introduction of cash in financial or non-financial institutions from criminal activities.</p>

	<p>c) Mixing with funds of legal origin: Carrying out successive financial transactions with the illicit money, mixing it with legal money, to eliminate or make it difficult to be tracked.</p> <p>d) Investment: Conversion of illicit money into different assets: real estates or properties, securities and other financial assets or façade businesses, by transferring the laundered funds to legal organizations and/or companies with no apparent links to organized crime.</p> <p>The degree of complexity in a money laundering scheme is almost unlimited.</p>
<p>Terrorist Financing</p>	<p>An offense consisting of, directly or indirectly, unlawfully and willfully, providing and collecting funds with the intention that they should be used, or knowing that they are to be used, totally or partially, for the purpose of causing death or serious bodily injury to citizens, or any other person not taking an active part in hostilities in a situation of armed conflict, when the purpose of such act is to intimidate a population, or to compel a good government or international organization to do or refrain from doing any act.</p>
<p>Interaction with Public Officials</p>	<p>Interaction is understood as:</p> <ul style="list-style-type: none"> • A management that seeks as a result some action, decision or granting of rights (licenses, permits, authorizations or similar) by the Public Official. • An action where the Public Official requires or requests from the company the management or delivery of goods and services through the establishment of agreements or contracts. • An action where the company requires or requests from a Public Official the management or delivery of goods and services through the establishment of agreements or contracts. • An action in which matters of interest to both parties are addressed, negotiated or discussed. <p>Ex: Negotiation of tariffs, participation in activities, negotiation or working tables, participation in drafting laws or regulations.</p>
<p>Positions Exposed to Risks of Compliance (PERC)</p>	<p>A position in which an Employee meets at least one of the following criteria:</p> <ul style="list-style-type: none"> • Represents the company externally acting on its behalf, with authority to take commitments and make decisions. • Has the authority to make commitments on behalf of the company.

	<p><i>To take a commitments means entering into contracts, taking obligations, social commitments, commitments in kind, contributions).</i></p> <ul style="list-style-type: none"> • Authorizes contracting, supervises or administers activities with Business Partners. <p><i>To administer means authorizing, approving, negotiating or requesting services, payments or information relevant to the relationship with the Business Partner.</i></p> <ul style="list-style-type: none"> • Has decision-making power in the disposition, use and destination of resources, services, assets or money of the company. • Interacts with Public Officials. • Handles or has access to sensitive and/or confidential information of the Level 3 company as stipulated in the T - 05 Information Storage Policy. • Makes business trips to foreign countries on behalf of the company. <p>Note: Internal personnel who have a <u>Technical and/or Ordinary Relationship with Public Officials</u>, perform routine payments, procedures or formalities in public agencies and who do not have negotiating or decision-making power or the capacity to commit the company to agreements are not considered positions with High Exposure to Compliance Risks.</p>
<p>Technical and/or Ordinary Relationship with Public Officials</p>	<p>Relationship will mean:</p> <ul style="list-style-type: none"> • Routine relations such as technical coordination, maintenance, outages, etc., or in compliance with legal or regulatory provisions, such as delivery of reports, information, documentation, follow-up of files. • Routine coordination derived from the execution of contracts and agreements previously signed between the company and the Public Official. • Protocol participation such as attendance to public events as guests, inaugurations, meetings for the presentation of new officers, leaders or directors, etc. <p>Other relations or meetings that do not qualify as interaction.</p>
<p>Immediate Supervisor</p>	<p>A person of a higher hierarchical level in the organization to whom the employee reports and directly coordinates his/her activities.</p>
<p>Employee</p>	<p>It includes directors, managers, officers or employees who are part of Inkia Energy or any of its subsidiaries.</p>

Inkia Energy	Energy holding made up by Inkia Energy and its subsidiaries.
Company	Subsidiary of Inkia Energy.
Beneficiary	A person, organization or institution that participates in a program, project or donation of goods and/or services.
Supplier	A qualified and experienced legal entity or individual that provides goods and/or services to the company.
Agent	Any third party acting on behalf of, in the interest of or in the name of Inkia Energy or any of its Subsidiaries.

4. POLICY STATEMENT

The Corporate Policy for the Prevention of Money Laundering and Terrorist Financing seeks to prevent the commission of these crimes through the following actions:

KNOWLEDGE OF THIRD PARTIES - DUE DILIGENCE

The main objective of the process of Knowledge of Third Parties/Due Diligence is to be able to reliably identify and know those third parties with whom it has a relationship either on a regular or occasional basis, by obtaining and verifying information and data, as well as analyzing their risk profile.

The due diligence processes established by Inkia Energy are as follows:

Employee Due Diligence

It is performed by the Human Resources Area of each OpCo on all employees of the Company in the selection process and from time to time while they keep an active employment relationship.

In the selection process, it is performed on the applicants by gathering general information about them and on the selected candidate by performing a financial and reputation screening, including their immediate family members.

During the employment relationship, this process is performed periodically and when an employee changes position within the organization.

For details of the Employee Due Diligence process, see Corporate Guideline P-02-01 Human Resources Due Diligence.

Customer Due Diligence.

It is performed by the Commercial Area of each OpCo on all the Company's Clients before signing the commercial agreement or contract and from time to time while they keep an active commercial relationship with the Company.

For details of the Customer Due Diligence process, see Corporate Guideline P-02-02 - Commercial Due Diligence.

Supplier Due Diligence.

It is performed by the Purchasing Area of each OpCo on all Suppliers at the time of their registration in the Supplier Matrix and from time to time as long as they maintain a commercial or contractual relationship with the Company.

For details of the Supplier Due Diligence process, see Corporate Guideline P-02-04 - Supply Chain Due Diligence.

Beneficiary Due Diligence.

It is performed by the Community Relations Area on all Beneficiaries of the Company's donation and social responsibility programs.

For details of the Partner Due Diligence process, see Corporate Guideline P-02-03 - Community Relations Due Diligence.

IDENTIFICATION OF UNUSUAL AND SUSPICIOUS OPERATIONS

All employees must be alert in order to identify unusual or suspicious transactions, especially those who are directly related to third parties or hold Critical Positions in the Company:

Unusual Operations: Operations whose amount, particular characteristics and frequency are not related to the economic activity of a company, are outside the regular parameters in force in the market or do not have an obvious legal basis.

Suspicious Operations: Civil, commercial or financial unusual operations carried out or intended to be carried out that have an unusual size or speed of turnover, or unusual or unjustified complexity, which based on the information gathered, in accordance with the Due Diligence, are presumed to come from some illicit activity, or that, for any reason, have no apparent economic or lawful basis; and that could be linked to Money Laundering or Financing of Terrorism.

When a transaction is identified that could have the characteristics indicated above, the Employee must report it immediately.

WHISTLEBLOWING AND REPORTING

When an Associate identifies facts or circumstances related to Money Laundering and/or Financing of Terrorism, he/she must report it through any of the following channels

- Immediate Supervisor
- Financial Area
- Legal Area
- Ethics or Compliance Area
- Inkia Energy Ethics Hotline

Regardless of who receives the report, the report must be brought to the attention of the Corporate Ethics and Compliance Department at the same time.

COMPLIANCE WITH LAWS AND REGULATIONS

Inkia Energy respects and complies with the wording and spirit of the laws and regulations in force in the jurisdictions where it operates.

The Legal Area or person responsible of the OpCo's will report on the additional obligations that each company must implement to comply with the Money Laundering and Terrorist Financing regulations in each of the jurisdictions where we operate.

RESPONSE TO REQUESTS FOR INFORMATION

Inkia Energy is committed to providing complete, accurate and true information when answering to requests for information related to our business when requested by the appropriate authorities or regulatory and supervisory bodies.

Requests for information must be reviewed together with the Legal Department. The Employee must have a thorough understanding of the information request and immediately involve appropriate Inkia Energy professionals as necessary to comply with the law, ensure that Inkia Energy's rights and the rights of its employees are protected, and provide accurate and consistent responses to such requests.

5. RESPONSIBILITIES

Employees

- Know and comply with the provisions of this Policy.
- Seek for orientation from the Legal and Compliance and Ethics Areas when required.
- Report any concern regarding this Policy.
- Participate in events or training organized locally in accordance with the applicable laws.
- Report any irregularity, suspected irregularity, unusual or suspected operation.

Managers and Supervisors

- Raise Employees awareness on the content and compliance with this Policy.
- Coordinate with and seek guidance from the Legal and Ethics and Compliance Areas to establish processes, practices and controls that ensure compliance with the requirements of this Policy.

Legal Area

- Answer to the requests of information.
- Inform about the legal requirements to comply with the legal framework in each of the jurisdiction we operate.

Ethics and Compliance Area

Area responsible for the administration of this policy and in charge of:

- Updating its content when required.
- Reporting any irregular or suspected situations identified during its operations.
- Communicating and disseminating updates, changes, exceptions and any other matter related to it.
- Referring and clarifying any doubt or comment on the Policy.
- Providing specific guidance on each situation or case that arises in application of the Policy.

6. CONTROL AND COMPLIANCE

Compliance with this Policy is mandatory. All Inkia Energy personnel must understand their role and responsibility in relation to this Policy.

The cases that arise shall be documented by the Employee and duly reviewed and approved, all information shall be kept on file as support when required by the Ethics and Compliance Area or any control body.

7. CONSEQUENCES OF NON-COMPLIANCE

Deviations and non-compliance with this policy may result in disciplinary measures, which, if applied, will serve as an educational component of our organizational culture.

Disciplinary measures must be fair, reasonable and proportional to the offense committed, respecting the corresponding legal framework.

8. EXCEPTIONS

Any exceptions to this policy must be dealt with on a case-by-case basis and must be duly supported by the CEO of the OpCo, and approved by the Corporate Director of Ethics and Compliance.

CHANGE CONTROL			
Edition	Date	Description	Updated by
1	04/28/2020	Initial document	Maria Vera
2	05/27/2020	English adaptations	External translator
3	07/15/2021	Updating of definitions	Ximena Corbetto and Evangelina Vidal
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