THE COLUMBUS SCHOOL POLICY FOR THE PREVENTION OF MONEY LAUNDERING, FINANCING OF TERRORISM, FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

Previous Definitions:
Counterpart: Allies, employees, suppliers, contractors.
Guardians: Relatives in the first degree of consanguinity or affinity, who hold parental authority and/or legal guardianship of the student.
List Control: Restrictive and binding lists
TF/FPWMD: /Laundering, Financing of Terrorism, Financing and Proliferation of Weapons of Mass Destruction
Sagrilaft: System of Self-control and Comprehensive Risk Management of Money Laundering and Financing of Terrorism.
Binding Lists: Are those lists of persons and entities associated with terrorist organizations that are binding for Colombia under Colombian law (article 20 of Law 1121 of 2006).
Restrictive lists: These are the public lists that relate to people, organizations or countries that, according to the body that publishes them, may be linked to money laundering activities, financing of terrorism or other crimes, administrative offenses or fiscal responsibility.

Objective: To present the guidelines for the prevention of /TF/FPADM and to establish the controls, activities to be followed with the counterparts of THE COLUMBUS SCHOOL that are likely to have operations in which there is a risk of ML/TF/FPADM.

Scope of the TF/FPWMD policies: This document is applicable to all processes in which risk factors of TF/FPWMD are present in the operations carried out by THE COLUMBUS SCHOOL.

Guidelines for the TF/FPWMD: No commercial, labor, contractual, educational or any kind of relationship will be established with national or foreign parties when evidence is presented that leads to doubts about the legality or legality of their resources.

Cash handling policy and payments to third parties: The receipt and/or payment of cash is not allowed. All payments will be made through bank transfers, payments to third parties (suppliers and contractors) will be made in the bank accounts that are solely created and authorized by THE COLUMBUS SCHOOL.

Control Lists : Binding lists for Colombia and other restrictive lists in accordance with international law (United Nations Lists), OFAC list or those other lists that demonstrate activities that by their nature generate a high risk of TF/FPWMD for THE COLUMBUS SCHOOL and that cannot be mitigated by the adoption of internal controls.

Sanctions for non-compliance: In observance of the present policy for TF/FPWMD, it will be sanctioned in accordance with what is institutionally established, in the Internal Work Regulations, contracts, conventions and agreements signed by THE COLUMBUS SCHOOL and in the applicable regulations, without prejudice to criminal, administrative or civil sanctions provided for by law.

Currency of the risk prevention policy for TF/FPWMD: The policy will be in effect as of 09/06/2022 but may be modified at any time by THE COLUMBUS SCHOOL authorized by the board of directors, in which case the pertinent will be communicated through the publication of said modifications in the means that are suitable and accepted by current Colombian Laws.

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Rector
THE COLUMBUS SCHOOL