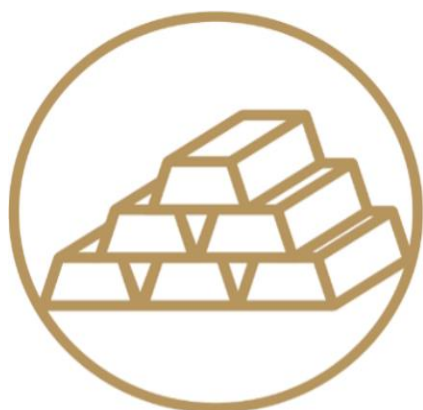




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## SAGRILIFT / FPADM POLICY

|                                                                                     |                                                                                            |                         |                                                                                       |
|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-------------------------|---------------------------------------------------------------------------------------|
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BYB GOLD SILVER S.A.S.

## **POLICY AGAINST MONEY LAUNDERING, TERRORISM FINANCING AND FPADM**

### **BYB GOLD SILVER S.A.S**

#### **Presentation**

In its deep commitment to the legality and prevention of money laundering practices, terrorist financing and financing of the proliferation of weapons of mass destruction, BYB GOLD SILVER S.A.S. will adopt the following guidelines in accordance with the Code of Ethics, having as a guide the rigorous adjustment to the legal system of our activities:

- An efficient Self-control and Integral Risk Management System for Money Laundering and Terrorism Financing will be designed, approved and implemented, with high national and international standards.
- Within the company, normative compliance will be promoted and strengthened, guided by respect for the legal system as a primary step to prevent the commission of crimes within it, especially ML / TF.
- It advocates the exercise of due diligence with the objective of obtaining a better knowledge of all our counterparties or stakeholders, in order to maintain commercial relationships in accordance with the law.
- The SAGRILIFT compliance system will be implemented, adopting both a Code of Ethics and a Manual adjusted to these policies, which will be mandatory for the members of the organization.
- The SAGRILIFT manual will be updated at most annually, where the procedures, assessment scales, methodology, identification criteria and risks measuring will be reviewed. The above, to maintain proper risk management that the organization faces on a daily basis.
- All risk management activity will be appropriately documented, which will allow to keep traceability of the activities carried out. Therefore, documentation procedures will be implemented to ensure the authenticity, integrity and availability of the information.

- The administration body and senior management manifest zero tolerance towards counterparties that are linked to restrictive lists, in order to protect the organization from contagion and / or reputational risks.
- In the event of an incursion into new market niches, a variation in products offer or a change in the business scheme, these must be adjusted to the procedures that the SAGRILAFT Manual stipulates.
- BYB GOLD SILVER S.A.S. will make the immediate report of suspicious or attempted operations to the UIAF, as well as negative reports.
- It advocates the divulgation and training of all members of the organization and certain external stakeholders regarding SAGRILAFT.
- The organization is free to make decisions to exclude clients, suppliers, employees or partners that involve ML / TF risks.
- Internal functions and responsibilities within the organization will be assigned to optimize the management and control of risks associated with ML / TF.
- All members of the organization must adopt an ethical behavior, adjusted to the law regarding the prevention of ML / TF risks.
- BYB GOLD SILVER S.A.S. will maintain permanent collaboration with control bodies to help and strengthen the fight against ML / TF.
- To strengthen trust and denunciation channels within the organization and with respect to external stakeholders, in order to report irregularities that threaten the Code of Ethics or legality.
- BYB GOLD SILVER S.A.S undertakes not to pay extortion or monetary sums for security in the region of operation, in this sense, it undertakes to report any conduct of this nature.
- In the framework of the development of activities, any person who has had a history and / or links to crimes underlying ML / TF will be excluded.

## **Obligatory nature of the Policy and sanction regime for noncompliance**

In accordance with the procedure regulated in the SAGRILAFT / FPADM Manual annexed to this Policy for infraction of its general provisions or the Code of Ethics, BYB GOLD SILVER S.A.S. anticipates that any infraction or noncompliance with the provisions of a partner, manager or employee will be considered a serious offense in accordance with the legal, statutory or regulatory provisions associated with the corresponding position, giving rise to the opening and instruction of the disciplinary procedure that may arise.



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| Responsible businesses and committed to legality!                                   |                                                                                            |                         |                                                                                       |
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