



PREVENTION OF MONEY LAUNDERING

We have a Money Laundering and Consumer Fraud Prevention program, which strictly adheres to all applicable legislation and global policies. In addition, there is a global and a local policy relating to the same, and a manual describing the operating details of this program.

As part of the controls in operation, there is a training and communication program on areas of potential risk, which must be completed each year or when required for other needs.



We have established follow-up metrics for the program so as to meet the globally-established objective, as well as systematic locks that do not permit certain positions to render a high-risk service without prior training.

At the global level, we have a monitoring system to oversee and mitigate the risk of unusual activities regarding certain products and services. Moreover, there are established procedures to identify, monitor, and mitigate potential risks of in-store fraud against our consumers.

Several channels are available so our associates and third parties may report any unusual activities, in addition to the mechanisms needed to conduct the corresponding investigations.

Likewise, we carry out the risk assessment in new financial products and services in order to implement preventive controls before their implementation.

In Mexico, the Committee for the Prevention of Money Laundering -comprising representatives from different areas of the company- has the purpose of providing visibility on potential risks and making decisions to mitigate these risks. The Committee meets bimonthly and shares trends, new projects, training percentages achieved, among other matters. In Central America, subjects related to money laundering are discussed during Corporate Governance meetings and, if necessary, are cascaded up to the Executive Committee for the market.



Global tools are used to conduct our risk-based due diligence with commercial partners, suppliers, buyers, and real estate projects