




INTELIGO
SAB

ANTI-MONEY
LAUNDERING AND
COUNTER
FINANCING OF
TERRORISM
POLICY

COMPLIANCE

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1. General

This Policy sets forth the following objectives and guidelines, which are aligned with the Anti-Money Laundering and Counter Financing of Terrorism Policy of Intercorp Financial Services Inc.:

- Describe and disseminate the guidelines set to manage Money Laundering and Financing of Terrorism (ML/FT) Risks.
- Transmit to the employees of Inteligo SAB the importance of early detection of transactions which may be associated with the ML/FT crime.
- Convey the importance and the need to know the clients, market, suppliers, counterparties, intermediaries and employees.

2. Update of the Anti-Money Laundering and Counter Financing of Terrorism Policy (AML/CFT)

Inteligo SAB shall be in charge of reviewing and updating, as and when applicable, the policies, manuals, processes and procedures of the ML/FT prevention and risk management program. Supervision of the aforementioned update is the responsibility of the Corporate Compliance Officer of Inteligo Perú Holdings S.A.C. ("CCO IPH") and of the AML/CFT Compliance Officer of Inteligo SAB ("AML-CO").

The Policy shall be published by electronic means and shall be available to the employees of Inteligo SAB. This document, and the policies, manuals, processes and procedures associated with the ML/FT prevention program are reviewed and updated, as and when applicable, at least once a year.


3. Duties and Responsibilities

3.1 Board of Directors of Inteligo SAB

- Approve and oversee compliance with the Risk Management Manual for the Prevention of Money Laundering and the Financing of Terrorism (hereinafter, the "Manual") and the Code of Conduct of Inteligo SAB.
- Set and review from time to time the operation of the prevention system based on the risk profile of Inteligo SAB.
- Designate the AML-CO in coordination with the General Manager and the CCO of IFS in accordance with the characteristics, responsibilities and authority required by applicable laws.
- Set the measures to ensure confidentiality of the AML-CO's identity.
- Provide the resources (human, technological, and others) and the infrastructure required to allow proper compliance with the duties and responsibilities of the CCO IPH and the AML-CO of Inteligo SAB.
- Approve the annual work plan of the AML-CO of Inteligo SAB, which includes the risk-based training plan for employees.
- Approve and review from time to time the new policies and procedures for ML/FT risk management.
- Supervise the activities of the AML-CO of Inteligo SAB.
- Oversee compliance with the ML/FT prevention system.

3.2 Chief Compliance Officer (CCO) of IFS

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- Designate the AML-CO, jointly with the General Manager and the Board of Directors, in accordance with the characteristics, responsibilities and authority required by applicable laws; and designate the CCO IPH jointly with the General Manager.
- Supervise the development and/or updates of the policies and manuals for ML/FT Risk Management and the Code of Conduct.
- Coordinate with the AML-CO the operation of the AML/CFT Program.
- Coordinate with the AML-CO the scenarios and/or methodologies for the generation of alerts.
- Assist the AML-CO in the analysis, evaluation and implementation of aspects associated with the AML/CFT Program as required.
- Assist the AML-CO, as and when required, in the risk assessment of new products and services, changes in the technological environment or the use of new technologies associated with the products and/or services which impact the AML/CFT Program.
- Coordinate with the AML-CO and the CCO IPH the preparation of the annual work plan, which includes the training plan for employees of the Money Laundering Prevention Office.

3.3 General Manager

- Designate, in coordination with the Board of Directors and the CCO of IFS, the AML-CO of Inteligo SAB in accordance with the characteristics, responsibilities and authority required by applicable laws; and, jointly with the CCO, designate the CCO IPH.
- Provide the resources required by the CCO IPH and the AML-CO to manage and implement the processes and controls of the AML/CFT Program.
- Assist the AML-CO in decision-making associated with ML/FT risk management, in line with set policies.
- Supervise the implementation and management, jointly with the Board of Directors and the AML-CO, of the ML/FT prevention system in accordance with applicable laws.
- Comply with the measures associated with the control of ML/FT risks in accordance with set policies, lending support to the AML-CO in the performance of its duties.


3.4 Corporate Compliance Officer of IPH (CCO IPH)

- Define the scope of the ML/FT prevention program in coordination with the CCO of IFS, based on corporate policies.
- Coordinate with the CCO of IFS the proper operation of the ML/FT Prevention System at Inteligo SAB.
- Supervise the implementation of actions to comply with the ML/FT Prevention System.
- Promote the strategy of Inteligo SAB to prevent money laundering, the financing of terrorism, collusion, bribery, corruption and traffic of influence.

3.5 AML/CFT Compliance Officer (AML-CO)

- Design, implement, review and update the AML/CFT Program, and supervise the risk score of clients, scenarios and/or methodologies for the generation of alerts.
- Update or create new policies and methodologies for ML/FT risk management and the Code of Conduct of Inteligo SAB, including the ML/FT Risk Management manuals.
- Review the methodology of the client risk matrix, rules for monitoring transactions and parameters / limits and review the procedures applied for the analysis and reporting of AML/CFT activity, and the

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weight placed on each variable and, if necessary, make the adjustments jointly with the Compliance Area of IFS.

- Manage the governance of high- and sensitive-risk client databases for purposes of assessing, controlling and mitigating the risk of clients on a consolidated basis. In the event that different risk scores for a single client are identified among subsidiaries, Inteligo SAB shall consider and update to the highest risk score.
- Safeguard the confidentiality and protection of personal data of clients in compliance with laws in force applicable to Inteligo SAB.
- Review from time to time compliance with the due diligence policies, processes and procedures of clients, suppliers, brokers, collaborators, intermediaries, and other stakeholders, recommending the application of controls required to prevent and manage the ML/FT risk, and the updates.
- Prepare the annual work program to be approved by the Board of Directors for December of the previous year, which should contain the strategies to prevent and manage ML/FT risks, and the methodology to implement each of the activities contained therein, including dates, roles and persons in charge of implementing each activity.
- Identify and report suspicious transactions to the Competent Authority.
- Prepare and submit the reports on ML/FT management required by the regulating entities and executive committees.

4. Know-Your-Client Due Diligence

Inteligo SAB has a manual of specific know-your-client procedures intended to mitigate the ML/FT risk. A client is defined as any individual or legal entity which has a contractual relationship with Inteligo SAB for brokerage services. Furthermore, the contracting party and the beneficiary or contractual counterparty, as applicable, are deemed clients, so these individuals or legal entities should be identified.


Inteligo SAB shall not onboard clients who request not to be identified, or who fail to provide sufficient information in accordance with local requirements. Furthermore, Inteligo SAB shall not onboard a client if it suspects that someone in an account is a front man or an impersonator.

Inteligo SAB is responsible for conducting the applicable client identification, verification and monitoring processes as provided in its internal procedures.

Every client has or is a final beneficiary. The final beneficiary is the individual on whose behalf a transaction is made and/or who has or exercises effective control over a client on whose behalf a transaction is made. A final beneficiary also includes persons who exercise effective control over an individual or a legal entity. All final beneficiaries must be identified by the Compliance Area of Inteligo SAB by checking the documents which evidence the identity thereof.

Acceptance of a client who fails to identify the final beneficiaries, provided the regulations allow it, shall require the formal approval of the CCO of IFS, for which purpose the relevant documents shall be submitted. The decision of the CCO of IFS (approval or rejection) shall be kept on the client's file. In the meantime, the client shall be blocked for a period of time until requirements are fulfilled.

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4.1. Identification Stage

Knowledge of the client is a fundamental aspect embedded in business relationships. Accomplishing such knowledge requires identifying the client to define activity profiles, the purpose and the nature of the business relationship and, thus, facilitate the detection and/or prevention of unusual and suspicious transactions, and also the identification of clients who may be prone to perform transactions associated with the alleged crime of ML/FT.

Conducting this identification of the client will require at least the data detailed in Annex 1.

The client may operate in Inteligo SAB only upon delivering all the documents requested within the time limit of 30 days.

4.2. Registration Updating Stage

Taking into account the risk level of the client, the client registration data shall be updated at least once a year using the applicable forms and also by collecting the documents required for the due diligence. The AML-CO shall make sure that client data is updated on an ongoing basis.

The documents shall be kept for a period of at least ten (10) years as from the transaction or payment date, in physical or electronic supports, by the area in charge defined in the ML/FT Risk Management Manual.

4.3. Screening with Restrictive Lists Stage

Prior to starting and during the business relationship with Inteligo SAB, all clients must undergo the stage of identification and verification in the restrictive lists. In all cases where matches are identified, the Compliance Area must be notified to conduct the ML/FT analysis prior to clearance (acceptance) of the client.

5. General Procedures for ML/FT Risk Management

Inteligo SAB has procedures in place to identify and assess the risks to which it is exposed, formalized in manuals that should be applied after gathering client data in the AML/CFT systems. This client risk scoring is an input to analyze client acceptance and monitoring, which should be obtained during client onboarding and updated during the business relationship at least once a year.


In the event that different risk scores for a single client are identified among subsidiaries, Inteligo SAB shall update the score to the highest identified risk.

In this connection, standards for scoring client ML/FT risk have been set. As a result, a score based on four ML/FT risk factors was obtained: client, products, geographic area and distribution channels, each of them with variables that allow scoring clients into sensitive, high, medium and low risk. To identify risk factors, Inteligo SAB must take into account, at least, the restrictive lists outlined in Annex 2 and the risk variables described in the Client ML/FT Risk Methodology.

5.1. Review of the Methodology Applied for ML/FT Risk Assessment and Management

Inteligo SAB shall conduct at least one annual review of the risk methodology to evaluate whether the variables considered in client risk scoring are aligned with the products and services available. This review

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shall include the evaluation of changes in products, services and distribution channels, and the analysis of ML/FT risk mitigation controls.

The Compliance Area of IFS shall oversee the final report and the CCO of IFS shall approve the ML/FT risk management methodology prior to implementing it.

5.2. Client Acceptance

Inteligo SAB shall obtain the minimum information on the client set forth in Annex 1 prior to starting its operations.

Clients with sensitive- or high-risk scores shall undergo the enhanced due diligence process and require the commercial and AML-CO endorsements, making sure that the business advisor has gathered any additional information required in the Compliance guidelines. Otherwise, the client shall not be accepted or will be blocked, until the requirements are met.

Exceptions must be documented and approved by the CCO of IFS.

5.3. General Due Diligence and Enhanced Due Diligence

For high- or sensitive-risk clients, Inteligo SAB shall apply the enhanced due diligence and such clients should be endorsed by the AML-CO within a period of 90 days, unless they are allowed a formal exception in writing by the CCO of IFS. The purpose of this enhanced due diligence review is to gather further information on the clients and conduct additional interviews prior to approving a client. Review of the enhanced due diligence processes shall be conducted on an annual basis.

For all clients scoring as medium risk, the general due diligence shall be conducted in the know-your-client process. In some exceptions, the enhanced due diligence may be applied for special cases identified by the ML/FT Prevention Committee of IFS.

Low-risk clients may be accepted with the simplified due diligence, if allowed by local regulations.

All of the information gathered, including the visit to the client, must be formalized and filed with the client documents. The documents shall be kept for a period of at least ten (10) years as from the transaction or payment date, in physical or electronic supports, by the area in charge defined in the Manual.

6. Monitoring Stage


Monitoring is the activity of reviewing the client and its operations to identify risks by the generation of alerts. An alert is an indicator of a behavior or characteristic of an unusual transaction or a series of unusual transactions by clients.

The alert generation process allows identifying unusual transactions that may result in suspicious transactions, which are reported to the Financial Intelligence Unit (UIF) by the ROSEL system. This report is submitted solely by the AML-CO.

6.1. Application of Monitoring of Typologies

All clients and their transactions shall be monitored by typologies defined and parameterized by the AML-CO. Such alerts are designed based on risk factors.

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6.2. Formalization of Analyses

The AML-CO is in charge of analyzing the alerts and reporting suspicious transactions to the UIF. This analysis must be formalized and contain all relevant information for the alert, evidence (if applicable) and conclusion thereof. The AML-CO may request additional information to the financial advisory and/or commercial and/or administrative areas to analyze the transactional behavior and profile of the client analyzed.

The time limit to analyze the alert from the identification thereof to the reporting of the suspicious transaction to the competent authorities is not to exceed 90 days. Exceptions must be approved by the ML/FT Prevention Committee of IFS.

6.3. Procedures to Report Suspicious Transactions to UIF-Perú

The AML-CO must communicate to the Financial Intelligence Unit of Peru (UIF-Perú) the transactions which, in the sound judgment of the AML-CO, are deemed suspicious, regardless of the amounts involved. The AML-CO is responsible for the control and documentation of the analyses and evaluations conducted to classify a transaction as unusual or suspicious, and for the reason for which an unusual transaction failed to be classified as suspicious and to be reported to the UIF, if applicable.

The Compliance Officer shall share the rationale for the cases reported to the UIF with the ML/FT Prevention Committee of IFS, with the purpose to promote good practices and improve the prevention models. Personal data of clients reported to the competent authorities shall be kept under strict confidential reserve and shall not be shared with members of the Committee.

The time limit to report the transaction as from being classified as suspicious shall be set in accordance with local regulations applicable to Inteligo SAB.

7. Assessment and Prior Analysis of New Products and Services

New products and services require ML/FT analysis and formal approval by the AML-CO prior to being launched.


Approval is also required when Inteligo SAB decides to acquire new technological tools associated with the products and/or service offered or when a change to an existing product, which changes its ML/FT risk profile, is made.

Transactions associated with a new product or service may be made only after such assessment. The assessment shall cover at least, but without limitation, the following criteria:

- Client type.
- Client identification, including the identification of final beneficiaries.
- Distribution channels.
- ML/FT risks of the new product and/or service.
- Third parties or legal representatives appointed to manage the new product.

The AML-CO shall issue a formal opinion containing the assessment of the ML/FT risk exposure level resulting from the launching of the new product and/or the change in the existing product, commercial

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practice or use of the new technology, which shall be submitted to the General Manager for approval. In the event of any disputes, the formal opinion must be submitted for approval by the CCO of IFS.

8. Selection and Hiring of Employees and Suppliers

As provided in applicable laws and regulations, the corporate policy of know your directors, managers and employees is adopted. Procedures are in place to know the directors, managers and employees, which entail gathering documents required by applicable regulations and which will be kept in personal files (in physical or electronic supports). The Human Resources Department of IPH shall be in charge of such procedures, which are detailed below:

Obtain at least the following information:

- Full names and surnames.
- Copy of the identity document.
- Marital status, including names, surnames and identity document number of the spouse or common-law spouse.
- Home address and telephone number of the usual residence.
- Certificate or other documents providing information on police and criminal records. Inteligo SAB may not onboard employees who have a police or criminal record or investigation proceedings pending in connection with the crimes of money laundering or the financing of terrorism. Exceptions require to be approved by the CCO and the General Manager of Inteligo SAB.
- Affidavit of net worth and other income, other than earnings from the employment relationship.
- Position to be held at Inteligo SAB.
- Indebtedness level as set forth in a Risk Rating Agency report.

During the selection process, and while the employment relationship lasts, employees shall be evaluated taking into account at least the restrictive lists detailed in Annex 2.

The AML-CO checks on a biannual basis whether any employee is included in a restrictive list. Matches must be reported immediately to the CCO IPH and the CCO of IFS for termination of the contract.

Inteligo SAB shall not engage or have an employment relationship with employees found to be included in any of the restrictive lists referred to in Annex 2.


The sworn statement of assets and liabilities of employees shall be updated at least every two years, using the applicable forms of Inteligo SAB.

8.1. Suppliers and Business Partners

For purposes of application of this policy, only suppliers and business partners under a contractual relationship with Inteligo SAB shall be considered as such.

Due diligence procedures have been put in place for the selection of all suppliers and business partners, for purposes of controlling ML/FT risk exposure at Inteligo SAB. To comply with knowledge of such suppliers and business partners, the following information must be obtained, without limitation:

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- Full names and surnames or corporate name if the supplier or business partner is a legal entity.
- Taxpayer Registration (RUC) number, or equivalent registration for non-residents.
- For individuals, identity document type and number.
- Address of the office or principal place of business.
- Years of experience in the market.
- Business lines in which the supplier provides its products or services.
- For legal entities, the identification of all shareholders, members or partners holding an interest in the capital stock, contribution, or in the legal entity, and the name of the legal representative, considering the information required for individuals.
- Affidavit from the supplier of not having a criminal record, if the supplier is an individual.
- Review of the supplier, business partners, their shareholders and legal representatives in the minimum restrictive lists set forth in Annex 2, but without limitation.

Inteligo SAB shall not engage with suppliers or business partners found to be included in any of the aforementioned restrictive lists. Based on a risk methodology, all information pertaining to the supplier shall be updated on an annual basis by the area in charge of the contractual relationship. Henceforth, all contracts shall contain a ML/FT prevention clause. See Annex 3 for reference.

The Compliance Area checks if a supplier or business partner is included in any restrictive list. Matches shall be reported immediately to the CCO IPH and CCO of IFS for termination of the contract.

9. Anti-Money Laundering Culture


9.1. Training Programs for Employees

Regardless of the position that they hold, employees must participate in training courses pertaining to AML/CFT at least once a year. The AML-CO shall define the topics to be incorporated in the training courses, which shall include at least the following:

- Concepts and policies set for prevention of Money Laundering and the Financing of Terrorism.
- ML/FT risks to which the institution is exposed.
- AML/CFT applicable external and internal laws and regulations.
- ML/FT typologies.
- Signs of alert to detect unusual and suspicious transactions.
- Procedure to communicate unusual transactions and/or reporting channels.
- Responsibility of all employees for ML/FT prevention.

AML/CFT training programs are mandatory and the employee must complete each training within the required time limit. Training programs must be updated on an ongoing basis by the AML-CO, to evaluate the development and effectiveness thereof, and to take the improvement measures deemed relevant and propose their implementation.

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Training is based on applicable laws and regulations, and evidence of participation must be kept with the personal files of each employee or in electronic supports. The AML-CO shall be in charge of organizing the annual training schedule, and of providing induction to all new personnel joining Inteligo SAB. The annual training program shall be approved by the ML/FT Prevention Committee of IFS prior to being submitted to the Board of Directors.

New directors, managers and employees shall be trained on the scope of the ML/FT risk management program, in accordance with their respective duties, within 30 days as from their entry date. The AML-CO and employees in its team are required to take at least two specialized training courses every year, other than those imparted to employees of Inteligo SAB, on ML/FT risk management.

An examination of the topics discussed, with individual grades for each employee, shall be conducted to measure the degree of comprehension of the annual training. Employees graded below 75% shall receive new training in the topic discussed. Training participants will receive a certificate of attendance (when applicable) in compliance with local regulations and good international practices.

9.2. Communication and Dissemination of AML/CFT Contents

Actions must be taken to sensitize directors, managers and employees on the relevance of this matter and to foster the ML/FT prevention culture. Taking into account that failure to comply with AML/CFT laws exposes IFS and Inteligo SAB to a reputational and image risk, and to administrative sanctions by regulators and criminal penalties, everyone is under the obligation to comply with the AML/CFT Policy and the associated external and internal laws and regulations.

Failure to comply with the provisions in this Policy shall be deemed gross misconduct or a very serious offense, as determined by internal investigations, and will entail from disciplinary measures to dismissal of the employee.


10. Governance

The AML-CO reviews and approves, on an annual basis, the procedures adopted to prevent and mitigate ML/FT risks, to ensure the consistency of internal controls and their adequacy in new environments, and to correct any failures and vulnerabilities detected. The scope of this annual review must include, without limitation:

- Verification of the completeness of the registration data entered in the systems, including client selection data which are the basis for risk assessment.
- Quality control of alert analyses and client due diligence.
- Performance and risk indicators for treatment of alerts and unusual cases. Verification of the timing of the alert analysis (time used in the analysis).
- Review of the proper analysis and documentation of ML/FT alerts.

The AML-CO submits to the CCO IPH and the members of the Prevention Committee of IFS periodic reports on the performance of the Compliance Area of Inteligo SAB, showing the number of alerts issued during the period, the situations identified and unsuccessful, reporting weaknesses identified in the process, among other performance indicators in the area.

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The AML-CO of Inteligo SAB submits, periodically and in a timely manner, the list of high- and sensitive-risk clients for the general knowledge of the Compliance Area of IFS and the CCO of IFS.

Contracts with clients, suppliers, employees and business partners must contain a money laundering and financing of terrorism prevention clause as part of the due diligence.

All of the registration information gathered from clients, suppliers and employees of Inteligo SAB must be kept up to date and available to the Compliance Area of IFS, which will conduct periodic reviews to ensure the application and implementation of the due diligence internal controls.

The AML-CO shall meet the applicable requirements of the Peruvian Securities Market Superintendence (*Superintendencia de Mercado de Valores del Perú*) set forth in the regulations for the submission of periodic reports and make them available to the Board of Directors.


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11. Change Control

Version	Approval Date	Author of the Change	Change Summary	Revised by	Approved by
1	01/29/2020	AML/CFT Compliance Officer of Inteligo SAB	First Version	Corporate Compliance Officer of IPH	Board of Directors
2	02/28/2022	AML/CFT Compliance Officer of Inteligo SAB	Main amendments in sections 4 and 5.	Corporate Compliance Officer of IPH	Board of Directors

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12. Annex 1: List of Minimum Information to be Requested

List of the minimum information to be acquired in the process of client onboarding. Additional information requests shall be admitted during the onboarding process as required by the evaluation process or based on regulatory requirements.


I. For individuals:

- a) Full name.
- b) Identity document type and number.
- c) Place and date of birth.
- d) Taxpayer Registration (RUC) and Holder Registration (RUT) number, if applicable.
- e) Nationality.
- f) Country of residence.
- g) Full address.
- h) If it is a politically exposed persons (PEP) set forth the name of the institution, public entity or international organization and position, and complete the PEP Annex.
- i) Telephone number and/or electronic mail.
- j) Occupation.
- k) Name of the workplace, position held and time of services.
- l) Purpose of the relationship to be established.
- m) Identification of the legal representatives, if applicable.

II. For legal entities:


- a) Full name of the entity (corporate name).
- b) Taxpayer Registration (RUC) number, or equivalent registration for non-residents.
- c) Holder Registration (RUT) number, if applicable.
- d) Address and telephone number of the office, principal place of business and/or parent company where the activities of the line of business are conducted.
- e) Corporate purpose, core business or purpose for the forming of the legal person or entity, as applicable.
- f) Identification of the shareholders, members or partners; the final beneficiary must be identified and obtain, for each of the individuals to which this criterion applies, the same information defined for individuals, identifying those who are politically exposed persons (PEPs) when appropriate.

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- g) Identification of the legal representatives. For each of them, the same information as for individuals must be requested, as well as the document evidencing the granting of the pertaining powers of attorney.
- h) Legal entities related to the client.
- i) Purpose of the business relationship.
- j) Financial position and profit and loss statements.

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13. Annex 2: Restrictive Lists

The minimum and mandatory restrictive lists are:


- I. OFAC List
- II. List of terrorists of the United Nations Security Council
- III. Lista on persons involve in terrorist activities
- IV. List of terrorists of the European Union
- V. Lists relative to Financing of the Proliferation of Weapons of Mass Destruction
- VI. List of FATF Non-Cooperative Countries and Territories
- VII. Listings of Resolutions of the United Nations Security Council

<https://www.treasury.gov/resource-center/sanctions/programs/pages/programs.aspx>

<http://www.fatf-gafi.org/countries/d-i/iran/documents/call-for-action-february-2020.html>

Restrictive lists must be updated from time to time, at least every month.

Furthermore, each subsidiary may define information sources and additional criteria to perform weightings in connection with the geographic area.

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14. Annex 3: AML/CFT Sample Clause for Suppliers

ADDITIONAL CLAUSE: PREVENTION OF MONEY LAUNDERING AND THE FINANCING OF TERRORISM

INTELIGO SAB is a “reporting entity”, as defined in the laws and regulations applicable to the prevention of money laundering and the financing of terrorism, and is under the obligation to provide information to the Financial Intelligence Unit (UIF-Perú) and to set mechanisms for the prevention and supervision of the crimes of money laundering and/or the financing of terrorism. Accordingly, INTELIGO SAB has implemented an “Anti-Money Laundering and Countering the Financing of Terrorism System” to ensure proper compliance with such laws and regulations.

In compliance with the above, THE SUPPLIER represents and warrants that:

- It has implemented the internal controls required to prevent its transactions from being used to commit crimes of money laundering and/or the financing of terrorism.
- It has taken the measures required to ensure that its employees and/or suppliers do not incur in any behavior associated with the crimes of money laundering and/or the financing of terrorism.
- It shall report to INTELIGO SAB of any situation of THE SUPPLIER or any situation related thereto which may be associated with an alleged crime of money laundering and/or the financing of terrorism.
- It shall allow INTELIGO SAB, at the request thereof, to conduct audits to verify the existence and/or operation of the controls intended to prevent money laundering and/or the financing of terrorism.

Should INTELIGO SAB know of or have any indications of any activity in which THE SUPPLIER may be associated with money laundering and/or the financing of terrorism, it shall deliver any such information as it may be required.

In the event of failure to perform any of the aforementioned obligations, and/or if the information requested fails to be delivered within the time limits set by INTELIGO SAB; or if the information delivered is incomplete, or having been delivered in a timely manner, INTELIGO SAB deems that if fails to justify the transactions of THE SUPPLIER, INTELIGO SAB may terminate the Contract automatically, which termination shall not involve payment of any compensation.

Should INTELIGO SAB incur costs and/or fines imposed by an administrative resolution or a binding judgment due to failure to comply with the provisions in this clause, THE SUPPLIER shall be liable for such penalties, compensation and/or fines, and for payment thereof, without reserve or limitation.

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