

(b)(6), (b)(7)(c)

File name: GM Expenses Fuad

Telcon 3-28-02 [redacted] following general advice of situation to RFK about a month ago)

Gastos de Gerente (non FCPA expenses)

Check made out to G.M., 1016 for Gastos de Gerente account approved by Controller only (no CAO approval)

G.M. will use for Gastos de Representacion (check on tax implications) - will go to general overhead misc expenses.

G.M. keeps private ledger indicating recipient

Only these expenses will go through this account

Qtrly Controller will compile list of Gastos de Gerente transactions and provide to [redacted] (or his replacement) who will review entries in ledger kept by GM

I will review for reasonableness quarterly (no documentation specified at this time)

RFK to be aware of magnitude and advised of significant changes

[redacted] will inform audit committee and EY Cinn (not Colombia)

Can be monthly or biweekly

Can be a fixed amount that is varied occasionally to put moneys in vs moneys out in balance.

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