

Prevention and Combating Money Laundering, Terrorism Financing and Corruption

This policy establishes the directives for the companies from the Votorantim Financial Conglomerate (hereinafter referred to as “The Conglomerate”) related to the practices for the prevention of money laundering, combating terrorism financing and anti-corruption.

Directives

1. General Aspects

- 1.1. We condemn acts of corruption, money laundering, terrorism financing or whichever other illicit acts.
- 1.2. We adopt procedures, in dealing with public agents, in order to inhibit the practice of corruption acts.
- 1.3. We prevent the money laundering practice, the terrorism financing, and corruption while doing business throughout the country and abroad, in consonance with the national legislation and current legislation in each country where we operate.
- 1.4. We operate in consonance with the international commitments undertaken by the Federal Government concerning the prevention and combat to the money laundering crime, to terrorism financing and corruption, observing the current legislation in force in the country.
- 1.5. The Conglomerate adopts procedures for the development of products and services to inhibit the utilization for illicit practices connected to money laundering, terrorism financing and to corruption.
- 1.6. We stimulate and participate from joint actions, within the scope of the National Financial System, for the prevention and combating of money laundering, terrorism financing, and corruption.
- 1.7. We make use of the parameters established by law in order to register transactions and identification of those considered as indication for money laundering or terrorism financing. For such, we invested in the development or in the acquisition of automated monitoring systems for performed transactions.
- 1.8. We make use of specific parameters in order to monitor financial transactions that may configure as a corruption indication.
- 1.9. We adopt due diligence procedures to mitigate the risks for money laundering, terrorism financing, and corruption, according to the activity, the jurisdiction, and agents involved.
- 1.10. We adopt restrictive measures regarding the performance of business and maintenance of business relationships with clients, suppliers, and partners when circumstances reveal evidence of involvement in acts connected to money laundering, terrorism financing, or corruption, observing the current legislation.
- 1.11. We condition the banking correspondent and non-banking correspondent hiring, to provide support services to our clients and users, to the inexistence of

administrative or judicial conviction as provided by the sanctions from Law Number 12.846.

- 1.12. We condition the maintenance of the correspondence relationship with other banks to the existence, within the scope of such banks, of mechanisms for the prevention of money laundering, terrorism financing, and corruption.
- 1.13. We consider, for the maintenance of business relationships with partners and suppliers, the existence, within the scope of such third-parties, of mechanisms to prevent corruption.
- 1.14. The Conglomerate possesses a specific branch to deal and deliberate about subjects related to the prevention of money laundering and combating terrorism financing and corruption. This branch reports to the Risks and Controls Committee.
- 1.15. The Conglomerate maintains training programs and the dissemination of the prevention culture towards money laundering, combating terrorism financing and corruption, in accordance to the legal requirements and best market practices.
- 1.16. The Conglomerate maintains a specialized structure responsible for the monitoring of all transactions from clients, focusing on the prevention of money laundering, on terrorism financing and corruption. Additionally, the Conglomerate maintains a communication channel intended to receive information or complaints, inclusively anonymous, from any employee or third party, about operations or suspicious proposals, identified during business negotiations.
- 1.17. We ascertain such indications and complaints of corruption acts practiced by direct or third party agents in benefit or interest of the Bank, against the public administration, in accordance to the current legislation.
- 1.18. We ascertain such indications and complaints of corruption acts practiced by direct or third party agents, against the Bank's patrimony, in accordance to the current legislation.
- 1.19. We preserve the identity of anonymous complainants.
- 1.20. We condemn whichever retaliation acts or retaliation intended against complainants in good faith, which opt to identify themselves.
- 1.21. We adopt protective measures for complainant employees in good faith, concerning facts caused by the complaint.
- 1.22. We evaluate, in the operations analysis, the instruments used, the performance manner, the frequency, the parties and amounts involved, the client's financial capacity and economic activity and whichever indication of irregularity or illegality involving the client or respective operations, with a view to detect indications of money laundering, terrorism financing or corruption.
- 1.23. The Conglomerate maintains copies of the client's documentations stored, as well as, registration of the operations and prevention analysis to money laundering performed, to terrorism financing and corruption, maintained in accordance to internal regulations, legislations and regulations from the countries in which operates.
- 1.24. The Conglomerate rigorously observes the recommendations from the Financial Action Group – GAFI (*Grupo de Ação Financeira*) that specifies a list of the countries with insufficient controls for the prevention of money laundering and

terrorism financing as well as restrictive lists issued by other international organizations for crime prevention, such as financial sanctions lists from the United Nations (UN), the US Office of Foreign Assets Controls (OFAC), UK HMT and European Union.

- 1.25. The Conglomerate does not admit, in the performance of business, transferring resources through anonymous bank accounts or connected to fictitious account holders.
- 1.26. We collaborate with public entities for the ascertainment related to damaging acts towards public administration, in consequence of our activities, observed the current legislation.
- 1.27. The Conglomerate adopts the best practices in combating corruption in the relationship with its parties, clients, suppliers, employees and government, and does not admit whichever sort or type of activities practiced by such against the public administration, national or foreign.

2. Know Your Customer – KYC

- 2.1. The Conglomerate establishes mechanisms for the identification and knowing its customers.
- 2.2. The Conglomerate adopts restrictive measures regarding the performance of business and the maintenance of business relationships with the client when the circumstances reveal evidences of money laundering, terrorism financing, and corruption.
- 2.3. The Conglomerate does not engage in relationship with legal entities that are Financial Institutions constituted in locations where there is not any physical presence and that is not integrated to any financial group subject to the effective local supervision.
- 2.4. The Conglomerate maintains specific norms to authorize the commencement and maintenance of business relationships with Politically Exposed People (PEP), in accordance to legal requirements.

3. Know Your Partner – KYP

- 3.1. The Conglomerate defines and maintains norms and mechanisms for the proper identification and actionable insight of its partners and respective activities, conditioning the existence of mechanisms related to the prevention of the money laundering crime, to terrorism financing and corruption, in the environment of control of such partners, when applicable.

4. Know Your Employee – KYE

- 4.1. The Conglomerate defines and maintains norms related to knowing your employee, with focus on the prevention and combating of money laundering, terrorism financing and corruption, which include criteria for hiring and conduct verification of such employees.

5. Know Your Supplier – KYS

- 5.1. The Conglomerate defines and maintains norms and mechanisms for the proper identification and actionable insight of its suppliers and service providers in accordance to the purpose of such relationship.

6. Know Your Correspondent

- 6.1. The Conglomerate defines and maintains norms and procedures for the identification and acceptance of correspondent banks, national and international, with the intent of preventing business performance with disreputable or suspicious of illicit activities.

7. Communication to Legal Authorities

- 7.1. The Conglomerate conducts, in secretively, inclusively regarding its clients, the processes of registration, analysis and communication to competent authorities of financial operations with indications of money laundering, or terrorism financing, as well as processes related to the ascertainment of suspected corruption acts.
- 7.2. We communicate, to competent authorities, the operations, or proposals of operations that, in sight of the current legislation, characterize indication of money laundering, terrorism financing, and corruption.

8. Validity

- 8.1. This policy is valid for one (1) year from the amendment date.

The directives contained within this policy are regulated and operated by means of norms and procedures that define the rules and processes for the correct fulfillment of these policies.

Validators

- Risks and Controls Committee
- Executive Committee (ComEx)
- Auditing Committee (COAUD)

Approvers

- Administration Council (CA)

Approvers in the System

- Controls and Corporate Governance Board
- Executive Management for Corporate and Shareholding Governance