



## **Prevention and Combat Against Money Laundering, Terrorism Financing and Corruption Policy**

1. Responsible area for the subject: Institutional Security Department - USI.
2. Scope: This policy guides the conduct of the Banco do Brasil. It is expected that all Banco do Brasil Entities formulate their individual policies in accordance with these guidelines, considering any specific requirements, including legal and regulatory aspects to which they may be subject.
3. Regulation: Resolution CMN 4.557/2017
4. Review periodicity: at least annually or extraordinarily, at any time.
5. Introduction: This policy guides Banco do Brasil's actions in relation to preventing and combating money laundering, terrorist financing and corruption, and comprises the list of policies associated with the management of operational risk at Banco do Brasil.
6. For the purposes of this policy, we consider the following definitions:
  - 6.1. Money laundering: consists of concealing or disguising the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense.
  - 6.2. Financing of terrorism: consists of allocating funds to terrorists, terrorist organizations or terrorist acts. Resources can be originated legally or illegally.
  - 6.3. Corruption: acts that qualify as corruption are considered to be those harmful to the public administration, national or foreign, practiced by legal entities; that violate national or foreign public property; against principles of public administration; or against the international commitments assumed by Brazil, defined as follows: to promise, offer or give, directly or indirectly, an undue advantage to a public agent, or a person related to him; demonstrably finance, fund, sponsor or, in any way, subsidize the practice of illegal acts provided for in Law 12,846/2013; demonstrably, to use an intermediary individual or legal entity (known as a shell company or fictitious company) to hide or disguise their real interests or the identity of the beneficiaries of the acts performed. With regard to bids and contracts: The competitive nature of a public bidding procedure implies in frustration or fraud, through adjustment, combination or any other expedient; prevent, disturb or defraud the performance of any act of public bidding procedure; remove or seek to remove a bidder, through fraud or offering an advantage of any kind; defraud public bidding or the contract resulting therefrom; fraudulently or irregularly create a legal entity to participate in public bidding or enter into an administrative contract; fraudulently obtaining an undue advantage or benefit from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the public bidding notice or in the respective contractual instruments; or manipulate or defraud the economic-financial balance of contracts entered into with the public administration. Corruption also consists of hindering the investigation or inspection activity of public bodies, entities or agents, or intervening in their performance, including within the scope of regulatory agencies and supervisory bodies of the national financial system.



- 6.4. Bribery: illicit act that consists of inducing someone to perform a certain act in exchange for money, material goods or other private benefits.
- 6.5. Facilitation payment: refers to the payment of small amounts of money or promises of other advantages for the personal benefit of a public agent, most of the times of low hierarchical level, with the objective of accelerating a certain process. It differs from bribery, as the process in question would be done anyway, but in a longer time than desired.
7. We repudiate and do not tolerate acts of corruption, bribery, extortion, kickbacks, fraud, money laundering, terrorist financing and any other illicit acts.
8. We do not authorize any type of facilitation payment.
9. We prevent money laundering, terrorist financing and corruption practices in conducting business in the country and abroad, in accordance with national laws, with that in force in each country where we operate and with legislation of transnational scope.
10. We act in accordance with the international commitments assumed by the Federal Government with regard to preventing and combating money laundering, terrorist financing and corruption, in compliance with current legislation.
11. We encourage and participate in joint actions, within the scope of the National Financial System, to prevent and combat money laundering, terrorist financing and corruption.
12. We adopt procedures, in the relationship with public entities, to inhibit the practice of acts of corruption.
13. We adopt practices and controls to prevent and combat money laundering and terrorist financing in line with the Wolfsberg Group's principles for correspondent banks.
14. We use parameters established by law, to record transactions and identify those considered evidence of money laundering or terrorist financing, in the development of automated systems for monitoring transactions.
15. We use specific parameters to monitor financial transactions that may constitute evidence of corruption.
16. We keep records of procedures adopted to prevent and combat money laundering, terrorist financing and corruption in accordance with current legislation.
17. We adopt procedures in the development of products and services to prevent their use for illicit practices related to money laundering, terrorist financing and corruption.
18. We carry out an internal risk assessment in order to identify and measure the risk of using our products and services for illicit practices of money laundering, terrorist financing and corruption, considering the risk profile of: customers; of the institution, including the business model and geographic area; operations, transactions, products and services, covering all distribution channels and the use of new technologies; and activities performed by employees, partners and outsourced service providers.



19. We do not allow the movement of funds through anonymous current accounts or linked to fictitious holders.
20. We evaluate, in the analysis of operations, the instruments used, the form of execution, the frequency, the parties and amounts involved, the financial capacity and the economic activity of the customer as well as any indication of irregularity or illegality involving the customer or its operations, in order to detect evidence of money laundering, terrorist financing or corruption.
21. We condition the initiation and maintenance of business relationships with customers that are Politically Exposed Persons to the authorization of senior management.
22. We adopt due diligence procedures to mitigate the risks of money laundering, terrorist financing and corruption, according to the activity, jurisdiction and agents involved.
23. We adopt restrictive measures in terms of conducting business and maintaining business relationships with customers, suppliers and partners when circumstances reveal evidence of involvement in acts related to money laundering, terrorist financing or corruption, in compliance with current legislation.
24. We condition the maintenance of a correspondence relationship with other banks to the existence, within those banks, of mechanisms to prevent money laundering and the financing of terrorism, as well as to the inexistence of administrative or judicial conviction in the sanctions provided for Law 12.846, of 01/08/2013.
25. We consider, in maintaining a business relationship with partners and suppliers, the existence, within the scope of those third parties, of mechanisms to prevent corruption.
26. We adopt procedures for monitoring the process of preventing and combating money laundering and the financing of terrorism by senior management, ensuring its commitment to the effectiveness and continuous improvement of the policy, procedures, and the required internal controls.
27. We maintain specific channels for receiving complaints, including anonymous ones.
28. We investigate evidence and denunciations of acts of corruption practiced by direct agents or third parties, for the benefit or interest of the Bank, against the public administration, in accordance with current legislation.
29. We investigate evidence and denunciations of acts of corruption practiced by direct agents or third parties, against the equity, principles and commitments assumed by the Bank, in accordance with current legislation.
30. We conduct, in a confidential manner, the processes of registration, analysis and communication of financial operations with indications of money laundering or terrorist financing to the competent authorities, including in relation to customers, as well as the processes related to the investigation of suspicious acts of corruption.
31. We keep the identity of whistleblowers anonymous.
32. We reject any acts of reprisal or retaliation against good faith whistleblowers who choose to identify themselves.



33. We adopt measures to protect employees who report in good faith in relation to facts arising from the report.
34. We communicate to the competent authorities the operations or proposals of operations that, in the form of the current legislation, characterize evidence of money laundering, financing of terrorism and corruption.
35. We collaborate with public authorities in investigations related to harmful acts to the public administration that result from our activities, in compliance with current legislation.
36. We adopt criteria for hiring and conducting employees, focusing on preventing and combating money laundering, terrorist financing and corruption.
37. We request that our suppliers adopt criteria for hiring and monitoring the conduct of employees, with a focus on preventing and combating money laundering and the financing of terrorism.
38. We maintain a specific employee training program on preventing and combating money laundering, terrorist financing and corruption.
39. We request that the banking correspondents who provide services to the Bank carry out training in preventing and combating money laundering and the financing of terrorism.
40. We submit, annually, the program to prevent and combat money laundering and the financing of terrorism and corruption, to the evaluation of an independent audit firm.
41. Date of the latest review: 12/16/2021