



Anti-Corruption and Bribery Policy

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1. PURPOSE

This Anti-Corruption and Bribery Policy ("Policy") establishes guidelines related to BR Partners' anti-corruption and bribery practices.

2. APPLICABILITY

The provisions of this Policy apply to all companies within BR Partners Group, as well as all stakeholders (clients, representatives, correspondents, employees, etc.) with whom BR Partners Group interacts.

3. GUIDELINES

- 3.1. Safeguard the image and reputation of BR Partners Group, ensuring it is not exploited by any stakeholders for unlawful activities.
- 3.2. Ensure compliance with laws and regulations aimed at preventing illicit activities, with a particular focus on those targeting corruption and bribery.
- 3.3. Establish know our employees, clients, suppliers, and partners processes and procedures, up to the identification of final beneficiaries, according to best market practices, clearly defining the responsibilities of those involved.
- 3.4. Pay attention to recommendations from Regulatory Bodies, as well as other international organizations regarding measures to prevent corruption and bribery (e.g., FCPA; UK Bribery).
- 3.5. Monitor transactions with clients and keep client documentation and operation records, in accordance with internal standards and applicable regulations.
- 3.6. Establish special procedures for transactions conducted with Politically Exposed Persons (PEPs) and persons related to PEPs.
- 3.7. Deliberate on matters related to illicit practices in a specific Committee.
- 3.8. Establish a whistleblowing channel for employees, clients, suppliers, and partners to report any illicit acts related to BR Partners Group.
- 3.9. Maintain confidentiality of information accessed due to the position or function, and not provide, transfer, or pass on, by any means or form, information protected by banking secrecy or confidentiality agreements.
- 3.10. Promote training and awareness programs for employees, directly or indirectly related to combating corruption and bribery.