

PLD-CFT Policy

Preventing Money Laundering and Combating the Financing of Terrorism

1. INTRODUCTION

This PLD-CFT Policy aims to promote the 4TBank guidelines by preventing money laundering and combating the financing of terrorism.

It is the responsibility of all employees, partners and directors of 4TBank, the knowledge, understanding and interest in the guidelines of this document.

2. REGULATORY STANDARDS

- Law 9613/1998 and amendments - Provides for crimes of "laundering" or concealment of assets, rights and values; preventing the use of the financial system for the respective offenses and creating the COAF - Council for the Control of Financial Activities;
- COAF Resolution 25/2013 - Deals with the intermediation and sale of high-value goods, that is, the movable asset whose unit value is equal to or greater than R \$ 10,000.00 (ten thousand reais) or equivalent in another currency.
- COAF Resolution 15/2007 - Provides for operations or proposals for operations related to terrorism or its financing.
- COAF Resolution 16/2007 - Provides for operations or proposals for operations related to terrorism or its financing.

3. GUIDELINES

The guidelines used for 4TBank's PLD-CFT are listed below in order to highlight the applied practices and provide transparency in the relationship with its customers and partners, as well as governments and regulatory authorities.

3.1 Internal controls

The internal procedures mapped, described and formalized are part of the fraud and crime prevention practices, as well as PLF-CFT, as they aim to establish operational criteria, employee activity controls and monitor customer operations.

3.2 Know Your Customer (KYC)

The 4TBank Know Your Customer (KYC) Policy was developed based on the best international customer control and monitoring practices, using the risk-based approach for internal classification of its customers and tools such as:

- Automated registration system for fraud control - Internal classification of customers by risk level

- Predefined systemic operational limits
- Alerts for registration update
- National and international restrictive lists - Negative media monitoring

3.3 Record of Operations

All operations carried out through the 4TBank platform will be recorded systematically and the histories will be kept through logs containing:

- I – client ID;
- II – description of operations;
- III – operation value;
- IV – date and time of the operation; and
- V – form of payment.

3.4 Monitoring of Operations

The monitoring of operations is fundamental for the identification of atypicalities that may characterize money laundering and committing fraud.

The Compliance area of 4TBank monitors and evaluates the operations of its customers according to the profile defined for that customer. In this way, the operational limits are established internally and systematically monitored, through a specific tool, the movements of customers, allowing the request for information and / or additional documentation to customers who operate outside their pre-defined profile at the beginning of the agreement relationship. with the Know Your Customer (KYC) Policy.

3.5 Communication to Regulatory Bodies

The operations or proposed operations that show any evidence of money laundering or terrorist financing, will be communicated to the Financial Activities Control Council - COAF, in compliance with the legal and regulatory provisions in force.

4TBank refrains from providing its respective customers or third parties with information on any communications made as a result of evidence of money laundering or the financing of terrorism.

3.6 Training

The Compliance area of 4TBank is responsible for conducting periodic PLD-CFT training with company employees, as well as requesting certifications.

Training can be carried out in person or remotely, in partnership with specialized companies, as long as the content is adequate and includes regulatory criteria and best market practices.

4. FINAL CONSIDERATIONS

Any doubts regarding the precepts of this document can be clarified by the Compliance area.

Non-compliance with the precepts contained in this policy is subject to analysis by the Executive Board, under the effect of the application of disciplinary measures.