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Prevention of Money Laundering and Terrorist Financing Policy


Elaboration	Review	Approval
Compliance	Compliance and PLDFT Director	Executive Board
Date: 26/01/2022	Date: 02/02/2022	Date: 10/02/2022
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1. Goal


hEDGEpoint Global Markets Distribuidora de Títulos e Valores Mobiliários Ltda. ("DTVM"), in compliance with the laws and regulations in force on Prevention of Money Laundering and Terrorist Financing ("PLDFT"), produced and will maintain this PLDFT Policy with the purpose of disclosing the principles and guidelines that will guide the DTVM's activities on the subject, as well as to guide the behavior expected by the DTVM on the subject with its employees, clients, partners and outsourced service providers.

The DTVM has as Principles regarding the PLDFT issue: (i). respect to the laws and regulations on PLDFT, through the total recognition of its importance to the continuous and healthy development of the economy, society and the Country; and (ii). total support to the regulatory bodies in ensuring a solid and efficient financial system, through the fight against the use of resources from criminal activities in its environment.

DTVM's internal regulatory framework on PLDFT comprises this PLDFT Policy, a document of public and general access, as well as the following specific procedures ("Procedures") for the internal orientation of its staff, partners and outsourced service providers for the execution of operational and control activities on PLDFT:

- Procedure for collecting, verifying, validating and updating registration information, aiming at knowing the clients, employees, partners and outsourced service providers ("Procedure for Collecting and Handling Registration Information");
- Operations and Financial Services Registration Procedure;
- Procedure for monitoring, selection, and analysis of suspicious transactions and situations and for communication to the Council for Financial Activities Control (Coaf) ("Procedure for Suspicious Transactions and Situations and for Communication to Coaf");
- Know Your Customer procedure;
- Meet Your Employee, Partners and Third-Party Service Providers Procedure; and
- Procedure of evaluation and previous analysis of new products and services, as well as the use of new technologies, considering the risks of money laundering and financing of terrorism ("Procedure of New Products, Services and Technologies with Focus on PLDFT").

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Such procedures are of restricted access to employees who need to know them in order to perform their functions, to internal and external auditing, and to regulatory agencies.

In addition to the PLDFT policy and respective procedures, the DTVM will maintain the Guidelines for Internal Evaluation of PLDFT Risk, a document that defines the risk categories adopted by the institution for the classification of its operations, products and services, clients and activities performed by employees, partners and outsourced service providers. This document contains the methodology for risk classification regarding the mentioned aspects, based on risk for PLDFT.

We would like to mention the total commitment of the DTVM's senior management - corresponding, according to its Articles of Incorporation, to the Executive Board - to the effectiveness and continuous improvement of this Policy, of the Procedures and internal controls related to PLDFT.

This Policy, additionally to the definitions and guidelines for the maintenance of the DTVM's Procedures and internal controls regarding the PLDFT subject, and considering its disclosure beyond the DTVM's employees (business partners, outsourced service providers and suppliers), brings information about what is expected from all these people in the relationship with the DTVM and guidelines for when people come across, in the development of their activities, with suspect situations of money laundering and financing to terrorism.


We appreciate the attention of everyone who has access to this Policy and your special attention to the subject of PLDFT.

2. Money Laundering

Money laundering aims to introduce into the economy goods, rights and values derived from illicit and/or criminal activities, through mechanisms that conceal their origin, nature or property, in order to give them a licit appearance. The crime of money laundering is only characterized when the occurrence of one or more previous crimes is proven, through which the criminals obtained the availability of these goods, rights or values.

The literature on the subject usually presents three phases of the crime of money laundering (usually successive), namely:

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- *Placement*: phase in which the illegal money is placed in the financial system, in a disguised way.
- *Layering*: the moment when financial transactions are carried out to keep the money away from its illicit origin. The larger the number of transactions and the more people involved, the more difficult it will be to trace the money back to the illicit activity that originated it.
- *Integration*: phase in which the money, already considered "clean" because it has a legitimate appearance, is sent to the beneficiaries of the criminal scheme, who can use it to purchase goods, services, or make investments.

However, it is important to emphasize that these stages are distinct and independent, in such a way that the presence of only one of the stages is sufficient to characterize the materiality of the crime.

3. Terrorist Financing

After the terrorist attacks of September 11, 2001, the UN signed the International Convention for the Suppression of the Financing of Terrorism in November of the same year 2005,, which was ratified by Brazil.


Any person who offers or receives, obtains, keeps in deposit, solicits, invests or in any way contributes to the obtaining of assets, goods or financial resources with the aim of financing, in whole or in part, a person, group of people, association, entity or criminal organization that has as its main or secondary activity, even if on a contingent basis, the practice of terrorism, is guilty of the crime of financing terrorism.

4. What is Expected from Everyone about PLDFT?

All DTVM's employees (including of course its directors and people in management positions), business partners, outsourced service providers and suppliers must conduct their professional and economic activities with the DTVM always attentive to the subject of PLDFT.

It is estimated that crime moves something like 5.5% of global GDP, or US\$ 5 trillion, causing violence, emptying formal jobs, damaging property, reducing the ability of people to make ends meet, and reducing the ability of people to pay.

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public services and general damages of all kinds. Thus, DTVM and the people mentioned in the paragraph above have a duty to do their part in the efforts to combat the proceeds of these crimes. The same effort should be directed to combating the financing of terrorism. Such persons must then, should they encounter a transaction or situation in which money laundering or terrorist financing is suspected, act according to the instructions in the following 5 Section.

5. Suspected Money Laundering - What to do?

The DTVM's employees, its business partners and outsourced service providers, in case during the conduction of their professional or economic activities with the DTVM they come across suspicious transactions or situations of money laundering or financing to terrorism, must contact the compliance department of the DTVM, through the contacts below:

Flavio Fukumoto

Executive Director in charge of Compliance and PLDFT Phone:

(55 11) 98107-4472

Email: flavio.fukumoto@hedgepointglobal.com Or

alternatively:

Jonson Chung


Compliance Manager

Phone: (55 19) 981679593

Email: jonson.chung@hedgepointglobal.com

Specific guidelines and instructions will be passed on at the moment of contact. In case of DTVM's employees, any internal communication channels or face-to-face contact at DTVM's offices may also be used. Whistleblowers should not have an active investigation posture of the situation, nor contact any third parties about their suspicions - especially the people on whom their suspicions fall, and they should only contact the compliance department of the DTVM.

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6. General Guidelines

The DTVM should:

- Promote an ethical and diligent organizational culture with a focus on strengthening PLDFT practices;
- Continuously improve this Policy, Procedures and internal controls related to PLDFT;
- Use effective means to disclose this Policy to its employees, partners and outsourced service providers, using clear and accessible language, in a level of detail compatible with the functions performed and the sensitivity of the information;
- Ensuring wide access to the information needed by the internal units responsible for controlling the processes linked to PLDFT, in order to carry out their activities;
- Initiate business relationship only after observing the registration procedures and get to know your customer, partners and third-party service providers; and
- Conduct periodic evaluations on the effectiveness of the PLDFT Policy, Procedures and internal controls.


7. Responsibilities

7.1. Responsible for compliance with this Policy

All employees, from the strategic to the operational level, are responsible for complying with this Policy, in accordance with its terms, as well as with the training received on the subject of PLDFT. The employees with management positions must conduct their activities with attention to the maintenance, in their respective areas of operation, of a control environment that favors the identification of transactions and situations suspected of money laundering and financing of terrorism.

Business partners and outsourcing service providers will also be required to comply, as applicable, with the terms of this Policy, in the scope of the maintenance of their respective contracts with the DTVM.

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7.2. Responsible for monitoring the implementation of this Policy

Compliance with this Policy, the Procedures, and the respective internal controls must be verified on three (3) levels:

- I. By the Compliance Department itself;
- II. By the Internal Controls area;
- III. By Internal Audit.

At the first level, the identification and correction of the deficiencies verified by any employee, from the Compliance Department or not, will occur with the agreement or determination of the Compliance and PLDFT Director or the Compliance Manager, who cannot omit, deny, or not determine the correction without relevant justification.

At the other levels, the verification and correction must follow the rules contained in the respective procedures of the areas, and the pointing out of deficiencies must be included in the Internal Controls Report or the Internal Audit Report, respectively.


The Internal Controls area will verify the effectiveness of the existing controls in the Compliance Department for PLDFT, in an intermediary function between the Compliance Department itself and Internal Audit.

The Internal Audit will conduct the analysis and evaluation of the adequacy/effectiveness of the DTVM's organizational system of internal controls and, specifically regarding this Policy and the Procedures, of the PLDFT controls.

7.3. Responsible for the maintenance of this Policy and for compliance with the obligations of Circular 3,978:

In general, the strategic roles and responsibilities for implementing and supervising compliance with the obligations of Central Bank Circular 978 will fall to the Chief Compliance and PLDFT Officer and the Compliance Manager, as established in this Policy. The operational roles and responsibilities will fall to the Compliance Analysts, under the supervision and control of the Compliance Manager.

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In addition, the Chief Compliance and PLDFT Officer will be responsible for maintaining and constantly updating this Policy, and the Compliance Manager will be responsible for maintaining and updating the Procedures listed in Section 1.

8. Governance Structure and Specific Responsibilities


8.1. Executive Board:

- To approve the DTVM's PLDFT Policy, as well as its proposed changes and updates.
- Evaluate the final money laundering and terrorist financing risk report for new products / services / technologies.
- Deciding on disciplinary actions for employees who fail to comply with internal, legal or regulatory standards on PLDFT, as well as the decision on hiring and continuing contracts with partners, third-party service providers and suppliers in consideration of PLDFT issues.

8.2. Compliance and PLDFT Director:

- Responsible for the strategic direction of the actions and infrastructure related to PLDFT;
- Making the final decision regarding the communication of operations or situations suspected of money laundering or financing of terrorism to COAF. For decision-making purposes, the Chief Compliance and PLDFT Officer may consult and/or discuss the matter with his/her team, members of the Executive Board, managers and employees from other areas, all under the duty of secrecy and confidentiality as to the matters discussed, and his/her decision must be grounded and formalized in a signed internal report, which will be part of the file mentioned in art. 3rd43, § of the Central Bank of Brazil's Circular;
- Submit any changes and updates to this Policy to the Executive Board for approval;
- To approve the Internal Risk Assessment, as well as forward it to the Executive Board for acknowledgement;
- Promote, together with the Compliance Manager, the dissemination of this Policy and the culture of PLDFT to the DTVM's employees, including through the preparation and execution of periodic training programs, announcements and communication actions awareness;

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- Approve clients classified as 'high risk', with due justification in writing in a duly signed internal report;
- Ensure that sufficient human and financial resources have been allocated for compliance with PLDFT rules and controls; and
- Coordinate the interaction with regulatory and self-regulatory bodies and entities on the subject of PLDFT.

8.3 Compliance Manager:

- Coordination of the preparation and review of the actions and infrastructure related to the PLDFT, aiming at the constant improvement of the monitoring tools and systems to identify suspicious operations or situations of money laundering or terrorism financing;
- Follow-up of legislation, regulation, and market standards regarding the PLDFT theme.
- Assist in keeping this Policy duly updated, suggesting changes to the Director of Compliance and PLDFT when necessary;
- Keeping PLDFT Procedures and internal controls effectively up-to-date;
- Make sure that the operational flows described in the Procedures are working properly and are properly formalized;
- Manage and guide the work of the Compliance Department analyst team.
- Track the performance of the analyst team as to their adherence to compliance with PLDFT procedures;
- Promote, together with the Compliance and PLDFT Director, the dissemination of this Policy and the PLDFT culture among the DTVM's employees, including through the preparation/execution of periodic training programs, communications and awareness actions;
- Maintain the technical certifications and training of the Compliance Department staff, so that they are always qualified to perform their functions in relation to the PLDFT theme;
- Supervise the compliance with this Policy, the Procedures and internal controls about PLDFT by the DTVM's areas and employees, as well as partners and outsourced service providers;
- Prepare the evaluation report for new products, services and technologies, according to the Section 9 of this Policy;

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- Prepare the internal risk assessment report and the annual effectiveness report in relation to the PLDFT, forwarding it to the Chief Compliance and PLDFT Officer and to the Executive Board; and
- Prepare the reports with the action plans to solve the deficiencies identified in the effectiveness evaluation, as well as the respective follow-up reports, and forward them to the Compliance and PLDFT Director by 30June of each year.

8.4 Compliance Analyst Team:

- Comply with the Procedures referred to in the Section of this1 Policy;
- Maintain controls related to Procedures;
- Prepare the PLDFT control reports requested by the Director of Compliance and PLDFT or the Compliance Manager for PLDFT control purposes; and
- To consult the Compliance Manager about any exceptional situations that cannot fit directly into the situations foreseen in the Procedures.


9. Guidelines for Defining Procedures for New Products, Services and Technologies

Aiming at preventing money laundering and the financing of terrorism in the offering of new products and services, as well as in the use of new technologies, the DTVM structured a procedure of assessment and previous analysis of risks. In this sense, the Compliance Manager should

- I. Prepare report considering the reflection of such products/services/technologies on the risk of money laundering and terrorist financing;
- II. In the case of evaluation and analysis of new technologies, consultations and discussions with the Technology Manager responsible for evaluating the new system or technological device - or, if necessary, with the provider of the technological solution - should precede the Compliance Manager's report; and
- III. Submit the final report for approval by the DTVM's Executive Board, without which the new products/services/technologies cannot be implemented.

10. Internal Risk Assessment and Effectiveness Evaluation Guidelines

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The DTVM must implement Internal Risk Analysis that takes into consideration the risk profiles of clients, the institution itself - as a result of its business model and its geographical area of operation - operations, transactions, products and services, covering all distribution channels and use of new technologies, and activities performed by employees, partners and outsourced service providers.

The identified risk, included in the Internal Risk Analysis (which should be reviewed every two years or when significant changes occur in the risk profiles that impact the DTVM), must be assessed as to its probability of occurrence and the magnitude of the financial, legal, reputational and socio-environmental impacts for the DTVM.


Risk categories must be defined that allow the adoption of enhanced management and mitigation controls for the higher risk situations and the adoption of simplified controls in lower risk situations.

Must be used as a subsidy to the internal risk assessment, when available, assessments conducted by public entities in the country relating to the risk of money laundering and financing of terrorism.

The Effectiveness Evaluation, documented in a specific report, and sent to the DTVM's Executive Board until 31March of the year following the base date of 31December, must contain information that describes: a) the methodology adopted in the effectiveness evaluation; b) the tests applied; c) the qualification of the evaluators; and d) the deficiencies identified. The Effectiveness Evaluation exercise must evaluate, at least a) the Know Your Customer Procedure, including the verification and validation of customer information and the adequacy of registration data; b) the Procedure for Suspicious Transactions and Situations and Reporting to Coaf, including the effectiveness evaluation of the parameters for the selection of transactions and suspicious situations; c) the governance regarding this Policy; d) the organizational culture development measures aimed at PLDFT; e) the periodic staff training programs; f) the Meet Your Employee, Partners and Third-Party Service Providers Procedure; and g) the actions for regularization of the notes arising from the internal audit and supervision by the Central Bank of Brazil.

The action plan aimed at solving the deficiencies identified in the Activity Evaluation and the respective follow-up report must be submitted to the DTVM's Executive Board by 30June of each year.

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11. Guidelines for Implementation of the Procedure for Collection and Handling of Registration Information

In order to establish risk classifications for PLDFT, the DTVM defined the standards for the collection, verification, validation and updating of registration information aiming at knowing its clients, collaborators, partners and outsourced service providers.

In general, all relevant information requested from / provided by / obtained in relation to customers, employees, partners and outsourced service providers will be verified by the Compliance Analyst responsible for the process. After this verification, such information must be, if possible, validated, based on the best technique, with public and private information systems, in order to be considered in the respective analyses and monitoring of PLDFT risk, and then archived. This information shall be periodically updated, as set forth in the Procedure for Periodic Collection and Treatment of Registration Information, for purposes of maintaining the continuous effectiveness of the monitoring of PLDFT risk.


12. Guidelines for the Selection and Hiring of Employees and Outsourced Service Providers

The DTVM shall carry out the selection and hiring of employees and outsourced service providers taking into consideration the best market techniques aiming at PLDFT, and which shall be reflected in the Know Your Employees, Partners and Outsourced Service Providers Procedure and its updates.

13. Guidelines for Training Employees on PLDFT

All DTVM's employees (including interns and outsourced service providers), as well as its future employees, shall go through internal training programs (training given by Compliance Department staff members) and external training programs (consultants or suppliers of educational content via platforms), and at least the internal training programs shall be updated annually. Everyone must also be made aware of the content of the Compliance Department's communications about PLDFT.

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The Compliance Department should plan to execute a more robust PLDFT training program for those employees who, by their function or activities, are classified at a higher risk level or whose functions demand a greater responsibility for PLDFT control.

If the DTVM hires business partners in the future, it should apply a training program based on the money laundering and terrorist financing risk brought by the respective business relationship.

14. Guidelines for Implementing a Registration Procedure for Transactions and Financial Services


The DTVM's Operations and Financial Services Registration Procedure establishes the criteria on how the operations and financial services offered by the DTVM are to be registered.

From these records, which must contain information that enables the individualization and identification of the client/counterparty, the Compliance Analysts who are performing the control of PLDFT can monitor, select and analyze the suspicious operations and situations, in the terms of the Procedure for Suspicious Operations and Situations and Communication to Coaf.

15. Guidelines for the Promotion of an Organizational Culture of PLDFT, including Employees, Partners and Third-Party Service Providers, and Employee Training

DTVM will promote an organizational culture focused on the prevention of money laundering and financing of terrorism, through measures such as: 1) internal and external trainings and communications to employees and outsourced service providers on the PLDFT theme; 2) engagement of partners, suppliers and outsourced service providers about DTVM's PLDFT standards, including through contractual clauses for partners, suppliers and outsourced service providers that, by the nature of the contractual link may effectively or potentially assist DTVM in the control of PLDFT; and 3) maintenance and promotion of a free reporting environment, by any employee or third party, about suspected situations of money laundering or financing to terrorism.

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16. Guidelines for Implementation of the Procedure for Suspicious Operations and Situations and for Reporting to Coaf

The DTVM must have a Procedure for Suspicious Operations and Situations and for Communication to Coaf guided by total transparency in the relationship with the government financial intelligence unit and the communication of suspicious operations and situations in a timely manner and with the most complete description possible of the facts, situations and supporting documentation, after the due internal analysis conducted by the DTVM under the terms of the respective Procedure.

17. Sights

The approval levels of the Corporate Policies are:

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18. Deadline / Scope / Areas Involved

The Policy goes into effect on the date of its approval by the DTVM Executive Board, and will remain in effect for a period of years².

The Policy applies to all DTVM's Collaborators, partners and outsourced service providers - which, together with suppliers, will be selected and contracted always taking into consideration the verification of the PLDFT risk and the best techniques in the market in which they operate, regarding the PLDFT theme.

All DTVM employees must have a perfect understanding of the internal rules about PLDFT. In case of doubt, the employees shall seek assistance from their managers and/or the Compliance Department. The allegation of ignorance of the rules will not be accepted as justification in the case of any non-compliance with the Policy or obligations informed to them by any means.

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The infraction of this Policy and other applicable and duly informed norms will give grounds to disciplinary actions, and the penalty to be applied will observe the seriousness of the infraction, and may even result in the termination of the labor or services contract.

We will consider an Operational Incident Event as any situation that has occurred and that may cause problems in the execution of the processes related to this Policy. Examples of Operational Incident Events are: unavailability of systems, problems in the integrity of information, typing errors, and others. Every event must be reported, regardless of its correlation with financial loss, to the Manager responsible for the process and the Compliance and Risk Areas for proper treatment, classification and eventual reporting at higher levels.


19. Related Legislation / Regulation

- Law 9.613/98;
- Law 13.260/16;
- Law 13.810/19;
- BACEN Circular 3.978/20;
- BACEN Circular Letter no. 4,001/20;
- BACEN Resolution 44/2020;
- CVM Resolution 50/21.

20. Internal Reference

- Internal Risk Assessment (PRO-CPL/BR-001);
- Procedure for Collecting and Handling Registration Information (PRO-CPL/BR-004);
- Know Your Customer Procedure (PRO-CPL/BR-003);
- Meet Your Employee, Partners and Third-Party Service Providers Procedure (PRO-CPL/BR-002);
- Procedure for New Products, Services and Technologies with Focus on PLDFT (PRO-CPL/BR-005);
- Procedure for Operations and Suspicious Situations and Communication to Coaf (PRO-CPL/BR-007);
- Operations and Financial Services Registration Procedure (PRO-CPL/BR-006).

Elaboration	Review	Approval
Compliance	Compliance and PLDFT Director	Executive Board
Date: 26/01/2022	Date: 02/02/2022	Date: 10/02/2022
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21. Bibliography

Not Applicable.

22. Version Control

Version	Date	History	Author	Validity
1	10/02/2022	Document Creation	Compliance	2 years

23. Approvals

Executive Board

Sérgio Ramos Lenharo - Executive Director

Flávio Fukumoto - Executive Director (Compliance and PLDFT Director)

24.

Attachments

Not Applicable

Elaboration	Review	Approval
Compliance	Compliance and PLDFT Director	Executive Board
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