

AUSTRAL



H O L D I N G

Quick Guide - Money Laundering Prevention

01 All of the Company's employees, clients and partners are responsible for adopting conduct aimed at preventing money laundering, as well as complying with and executing the procedures, guidelines and general controls described and established by the Company;

02 All counterparties, clients, suppliers, third-party applicants, brokers, service providers, suppliers, third parties, insured parties in the case of optional contracts and employees undergo an internal risk assessment in order to be categorized so as to maintain more assertive control over the parties that pose the greatest risk of money laundering;

03 The Company has established the following risk categories: prohibitive; high risk; and low risk, the classification of which depends on the positive or negative response to the risk factors determined in the documentation on the subject. These factors refer to the main characteristics of suspicious counterparties used in national and international literature, such as: (i) classification as a politically exposed person; (ii) FATF sanctions list; (iii) association with negative media, among others;

04 At the time of the initial analysis, the employee responsible for the relationship must be aware of the prohibitive risk factors established by the Company, which are: countries with business restrictions by the FATF; and counterparties sanctioned for money laundering and terrorist financing by international organizations;

05 All counterparty registrations are duly recorded, both those approved and those rejected, so that the Company has proper knowledge of all cases in an internal information system and can follow up and monitor what it considers pertinent;

06 When it is not possible to obtain the data used by the Company to identify and qualify the High Risk counterparty, using the tools available, the person responsible for the relationship must request the missing information directly from the counterparty, following the deadlines established by the Company;

07 To accept counterparties categorized as High Risk, the authorization of the Governance, Risks and Compliance Officer must be obtained prior to the start of the business relationship or for the continuation/renewal of existing relationships;

08 It is essential that counterparties have their due diligence up to date by less than 6 months at the time of any payment of indemnity or return of premium and in contract renewals, with due regard for the particularities of the Company's processes, which are described in a policy on the subject;

09 The areas are instructed to notify the responsible department in good time whenever any atypical transaction is identified, so that the appropriate analysis can be carried out;

10 All employees must observe the indicators related to monitoring suspicious transactions, listed in the documentation on the subject, in order to identify them and report them to COAF, where applicable, as well as ensuring consistent and transparent transactions;

11 The areas with the greatest visibility are responsible for observing the two cases in which the Company must report to COAF automatically, without any analysis or judgment of value being necessary: (i) transactions made in cash above R\$ 10,000; and payments made in foreign accounts above R\$ 100,000.000; and payments made into foreign accounts in excess of R\$ 100,000; and

12 In addition to the points listed above, risk underwriting, asset transactions, private negotiations and the hiring of third parties must be guided by ethics, in accordance with internal manuals and policies and current legislation, all of which are disclosed to the company's employees and counterparties.