

Subject: Anti-Money Laundering (AML)/Combating the Financing Terrorism (CFT) Policy

1) Objective

This Policy aims to establish the strategy, principles, and concepts of the Daycoval Prudential Conglomerate's ("Conglomerate") AML/CFT Program.

2) Scope

The AML/CFT Policy applies to all companies within the Conglomerate — departments and branches of Banco Daycoval S/A, Daycoval Leasing, its controlled and affiliated companies, both in Brazil and abroad.

All employees of the Conglomerate, third parties, business partners, and service providers must act diligently within the AML/CFT Program, observing the rules and guidelines described in this Policy and related documents, to prevent the Institution from being used for illegal activities related to money laundering, terrorism financing, or the financing of the proliferation of weapons of mass destruction (AML/CFT).

All employees of the Conglomerate, third parties, business partners, and service providers must remain alert to any and all transactions carried out within the Institution and follow the prevention, monitoring, detection, and reporting procedures described in this Policy and in the AML/CFT Manual.

Failure to comply with the applicable legislation on the matter subjects' offenders to criminal and administrative penalties.

3) Implementation

Immediate, upon publication on the Corporate Intranet – Normative Instructions Portal.

4) Regulatory Rule(s)

Law No. 9,613, of March 3, 1998: Provides for the crimes of money laundering or concealment of assets, rights, and values; establishes measures to prevent the use of the financial system for the illicit acts set forth in this Law; creates the Financial Intelligence Unit (FIU, formerly COAF); and provides other measures.

Law No. 12,683, of July 9, 2012: Amends Law No. 9,613 of March 3, 1998, to make the prosecution of money laundering crimes more efficient.

Law No. 12,846, of August 1, 2013: Provides for the administrative and civil liability of legal entities for acts against the public administration, both domestic and foreign, and makes other provisions.

Law No. 13,260, of March 16, 2016: Regulates item XLIII of Article 5 of the Federal Constitution, governing terrorism, investigative and procedural provisions, and redefining the concept of a terrorist organization; also amends Laws No. 7,960 of December 21, 1989, and 12,850 of August 2, 2013.

Law No. 13,810, of March 8, 2019: Provides for compliance with sanctions imposed by United Nations Security Council resolutions, including the freezing of assets of natural and legal persons and entities, and the national designation of individuals investigated or accused of terrorism, its financing, or related acts; and revokes Law No. 13,170 of October 16, 2015.

BACEN Resolution No. 44, of November 24, 2020: Establishes procedures for implementation by institutions authorized to operate by the Central Bank of Brazil regarding the measures determined by Law No. 13,810 of March 8, 2019, concerning the enforcement of sanctions imposed by UN Security Council resolutions, including asset freezes and national designations related to terrorism and its financing.

BACEN Resolution No. 96, of May 19, 2021: Provides for the opening, maintenance, and closing of payment accounts.

BACEN Resolution No. 119, of July 27, 2021: Amends Circular No. 3,978, of January 23, 2020, regarding the policies, procedures, and internal controls to be adopted by institutions authorized to operate by the Central Bank of Brazil to prevent the use of the financial system for money laundering and terrorism financing, as set forth in Law No. 9,613 of March 3, 1998, and Law No. 13,260 of March 16, 2016.

BACEN Resolution No. 131, of August 20, 2021: Consolidates the rules governing the administrative sanctioning process, penalties, commitment terms, precautionary measures, daily fines, and administrative agreements under Law No. 13,506 of November 13, 2017, and defines parameters for administrative penalties under Law No. 9,613 of March 3, 1998.

BACEN Resolution No. 277, of December 31, 2022: Regulates Law No. 14,286 of December 29, 2021, concerning the foreign exchange market and the inflow and outflow of funds in domestic and foreign currency, and provides other measures.

CVM Resolution No. 50, of August 31, 2021: Provides for the prevention of money laundering, terrorism financing, and the financing of the proliferation of weapons of mass destruction (AML/CFT) within the securities market and repeals CVM Instruction No. 617 of December 5, 2019, and its Explanatory Note.

CVM Resolution No. 62, of January 19, 2022: Prohibits the creation of artificial conditions of demand, supply, or price of securities, price manipulation, fraudulent operations, and unfair practices, repealing CVM Instruction No. 8 of October 8, 1979, and CVM Deliberation No. 14 of December 23, 1983.

BACEN Circular No. 3,978, of January 23, 2020: Establishes the policies, procedures, and internal controls to be adopted by institutions authorized to operate by the Central Bank of Brazil to prevent the use of the financial system for money laundering and terrorism financing.

BACEN Circular Letter No. 4,001, of January 29, 2020: Lists operations and situations that may indicate the occurrence of money laundering or terrorism financing crimes, which must be reported to the Financial Intelligence Unit (FIU).

BCB Normative Instruction No. 262, of March 31, 2022: Specifies and clarifies operational aspects of the procedures established in BCB Resolution No. 44, of November 24, 2020, for implementing measures under Law No. 13,810, of March 8, 2019, regarding compliance with UN Security Council sanctions and national designations related to terrorism or its financing.

SUSEP Circular No. 612, of August 18, 2020: Provides for the policies, procedures, and internal controls specifically aimed at preventing and combating money laundering or related crimes, as well as preventing and suppressing terrorism financing.

5) Business Execution Rules

The business execution rules shall be carried out in accordance with the applicable legislation listed in item 4, as well as internal process manuals.

6) Involved Areas and Responsibilities

Board of Directors	Review and approve the Institutional AML/CFT
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	<p>Policy;</p> <p>Ensure adherence to the policies, strategies, and established risk management limits, as well as the timely correction of deficiencies in the risk management structure;</p> <p>Designate the Executive Officer responsible for compliance with BACEN Circular No. 3,978/2020 and CVM Resolution No. 50/2021 and notify the Regulatory Authorities within seven (7) business days of appointment.</p>
Executive Board	<p>Implement the AML/CFT structure;</p> <p>Adjust the Policy, approve the AML/CFT Procedures Manual and the Know Your Customer (KYC) Manual, as well as related rules, procedures, and internal controls;</p> <p>Evaluate compliance with the terms of the Standards, Policies, and Strategies for AML/CFT management;</p> <p>Direct the actions necessary to ensure the effectiveness of the Policy, AML/CFT Manual, and related internal controls;</p>
Executive Officer responsible for BACEN Circular No. 3,978/2020 and CVM Resolution No. 50/2021	<p>Approve the report on the Internal AML/CFT Risk Assessment, within the timeframes defined by current legislation.</p> <p>Implement and maintain the AML/CFT Policy consistent with the institution's nature, size, complexity, structure, risk profile, and business model, ensuring effective risk management for AML/CFT;</p> <p>Respond to requests from Regulatory Authorities.</p>
Other Daycoval Bank and Daycoval Leasing Executive Officers	<p>Approve the AML/CFT Procedures Manual and the Know Your Customer (KYC) Manual, as well as related rules, procedures, and internal controls;</p> <p>Comply with the terms of the AML/CFT Policy and Manual, as well as other internal and external requirements applicable to the subject;</p> <p>Support the AML/CFT Executive Committee in consultations on clients, transactions, and matters related to AML/CFT from a business perspective, when invited;</p> <p>Monitor and support the employees of their Business Units, ensuring adherence to internal and external standards.</p>
AML/CFT Executive Committee	<p>Ensure the Institution's compliance with current legislation, as well as adherence to its guidelines and strategies, to mitigate the likelihood of reputational, legal, and operational risks related to AML/CFT;</p> <p>Analyze clients and/or transactions submitted for approval.</p>
AML/CFT Department	<p>Ensure institutional compliance with current legislation, the Policy, and the AML/CFT Manual;</p> <p>Prepare the Internal Risk Assessment (IRA) report within the timeframes defined by current legislation;</p> <p>Define rules and controls for client acceptance, transaction analysis, and monitoring of suspicious</p>

	<p>activities;</p> <p>Analyze new clients identified through account-opening tools;</p> <p>Support the commercial area with pre-analysis of transactions;</p> <p>Analyze occurrences flagged by the AML/CFT monitoring tool;</p> <p>Report clients and/or transactions identified with indications of money laundering, terrorism financing, or proliferation financing to the FIU, as required by Circular No. 3,978/2020, CVM Resolution No. 50/2021, and Circular Letter No. 4,001/2020;</p> <p>Promote AML/CFT awareness among employees, third parties, business partners, and service providers;</p> <p>Prepare metric and effectiveness indicator reports related to atypical operations, analyses performed, and the number of suspicious transaction reports, for review by the Statutory AML/CFT Officer;</p> <p>Respond to requests from Regulatory Authorities.</p>
Independent Audit	Evaluate compliance with AML/CFT standards applicable to independent auditors.
Internal Audit	<p>Periodically review AML/CFT procedures executed by the responsible department and assess the effectiveness of the AML/CFT Program, proposing improvements as needed;</p> <p>Evaluate records in the institution's monitoring system according to applicable legal deadlines;</p> <p>Prepare an Audit Report to be reviewed by the Executive Board and made available to Regulatory Authorities upon request;</p>
Governance, Risk and Compliance	<p>Apply methodology to identify, assess, monitor, measure, control, and continuously mitigate the causes of operational risk events, coordinating and ensuring preventive and/or corrective action plans regarding AML/CFT;</p> <p>Conduct control tests to evaluate the internal control and compliance systems;</p> <p>Prepare reports, at least annually, to identify and promptly correct deficiencies in AML/CFT controls, submitting them to the appropriate governance bodies.</p>
Business Units	<p>Comply with the AML/CFT Policy and Manual, as well as other internal and external requirements applicable to the subject;</p> <p>Support the AML/CFT Executive Committee in consultations on clients, transactions, and matters related to AML/CFT from a business perspective, when invited;</p> <p>Maintain updated client registration information;</p> <p>Ensure that all employees are trained and inform the Human Resources Department of any additional training needs.</p>
Corporate Account Opening Department (Legal Entities)	Comply with the AML/CFT Policy and Manual, as well as other internal and external requirements;

	Responsible for the checklist and validation of information provided in the corporate account opening process; Identify and register the beneficial owners of corporate clients; Identify and validate administrators and representatives authorized to sign client registration forms; Assess the quality of client and supplier registration information to ensure compliance with internal and regulatory requirements; Ensure client records are kept up to date.
Personal Account Opening Department	Comply with the AML/CFT Policy and Manual, as well as other internal and external requirements; Responsible for the checklist and validation of information provided in the personal account opening process.
Cash Management	Comply with the AML/CFT Policy and Manual, as well as other internal and external requirements; Report cash transactions exceeding BRL 50,000.00 to the FIU, as required by Circular No. 3,978/2020.
Human Resources	Coordinate AML/CFT training programs for employees, third parties, business partners, and service providers, ensuring proper understanding of duties and responsibilities; Provide AML/CFT training materials; Apply Know Your Employee (KYE) procedures for recruitment in accordance with current AML/CFT legislation.
Employees, Service Providers, and Business Partners	Comply with applicable legislation, the AML/CFT Policy, and the AML/CFT Manual, identifying atypical situations and notifying the AML/CFT department for appropriate action.

7) General Guidelines

The Daycoval Prudential Conglomerate ("Conglomerate"):

a. Adopts an AML/CFT Program structured on the following pillars:

- AML/CFT Policy: Defines the strategy and principles that guide this matter within the Institution.
- AML/CFT Procedures Manual: Defines the concepts, procedures, and internal controls established in the AML/CFT Policy, including procedures for: Know Your Employee (KYE), Know Your Supplier (KYS), Know Your Partner (KYP), International Correspondent Banks, and Monitoring, Selection, Analysis, and Communication (MSAC) methodology for identifying atypical situations and operations.
- Know Your Customer (KYC) Procedures Manual: Defines the concepts, procedures, and internal controls established in the AML/CFT Policy, including procedures for Know Your Customer (KYC).
- Internal AML/CFT Risk Assessment (IRA): Aims to identify, analyze, understand, and mitigate money laundering, terrorism financing, and proliferation financing risks inherent to the Institution's activities, ensuring that preventive and mitigating measures are proportionate to the risks identified.

b. Has an Operational Structure that:

Is designed to comply with obligations to prevent money laundering, terrorism financing, and proliferation

financing, as provided by Law No. 9,613/1998 and regulatory body requirements, with employees under the direct management of the General Manager of AML/CFT, AML/CFT Superintendence, and the Executive Officer responsible for BACEN Circular No. 3,978/2020 and CVM Resolution No. 50/2021.

c. Has an AML/CFT Executive Committee that:

Ensures compliance with this Policy's guidelines and obligations established by Law No. 9,613/1998 and the regulations of Supervisory Authorities, and deliberates on matters related to money laundering, terrorism financing, and proliferation financing.

The composition, roles, and responsibilities of the Committee are detailed in the document AML/CFT Executive Committee.

d. Conducts New Products and Services Evaluation that:

Are assessed beforehand under AML/CFT criteria according to internal normative guidelines, establishing rules and procedures for offering new products and services, as well as for adopting new technologies, in order to prevent and evaluate the risk of their use in activities linked to money laundering, terrorism financing, or proliferation financing.

e. Conducts Internal AML/CFT Risk Assessment that:

Identifies and measures money laundering, terrorism financing, and proliferation financing risks associated with clients, products, and services, defining risk categories that allow the implementation of appropriate management and mitigation controls for both higher and lower risk situations, as set forth in the Internal Risk Assessment (IRA) document.

f. Applies Know Your Customer (KYC):

Implements procedures to know its clients, ensuring due diligence in their identification, qualification, and classification, with enhanced diligence for higher-risk clients based on internal risk assessment.

i. Client Registration

Implements identification, qualification, and classification procedures for clients through the collection, verification, and validation of registration and financial information. These procedures are defined according to the Institution's Internal Risk Assessment.

ii. Identifies Politically Exposed Persons (PEPs)

Implements procedures to identify and approve the maintenance of business relationships with clients who may appear on lists of Politically Exposed Persons (PEPs), directly or indirectly.

iii. Identifies the Ultimate Beneficial Owner

Implements procedures for analyzing ownership chains to identify, qualify, and classify the natural person characterized as the ultimate beneficial owner.

iv. Reputational

Implements procedures to screen clients at the beginning of the relationship in national restrictive lists (Transparency Portal, IBAMA, etc.) and international ones (OFAC, UN, EU, HMT, etc.) as well as negative media databases (World-Check, Clip Laundering, etc.) to identify potential links to money laundering, terrorism financing, or proliferation financing, and to take appropriate actions.

v. Customer Information Update

The Institution adopts deadlines for customer record updates based on the AML/CFT risk level established for each client, following current legislation.

g. Applies Know Your Employee (KYE):

The Institution sets guidelines for hiring and selection processes, applying identification, qualification, and classification procedures and controls. Continuous monitoring is also conducted to detect and address suspicious situations post-hiring.

h. Applies Know Your Supplier (KYS):

The Institution establishes guidelines for the selection and contracting of suppliers, applying identification, qualification, and classification procedures and controls to avoid engaging companies that are unfit or suspected of involvement in illicit activities.

i. Applies Know Your Partner (KYP):

The Institution sets guidelines for the selection and contracting of business partners, applying identification, qualification, and classification procedures and controls to ensure compliance with AML/CFT standards and avoid relationships with individuals or entities suspected of involvement in illicit activities.

j. Evaluates International Correspondent Banks:

Evaluated beforehand under AML/CFT criteria when establishing relationships, according to internal regulations.

Banco Daycoval S/A does not engage in relationships with Shell Banks—banks established in jurisdictions without any physical presence and not integrated into a regulated financial group.

k. Conducts Client Analysis where:

A set of rules, procedures, and controls is adopted to identify and approve new clients, preventing business with individuals or entities suspected of involvement in illicit activities.

To protect the National Financial System (SFN) and society, the Conglomerate adopts the following rules for the categories of clients listed below:

Situation	Rules
Non-account holders (Tourism Exchange)	Prior Evaluation (EDD)
Offshore Clients	Prior Evaluation (EDD)
Shell Banks	Prohibited
MVTS / MSB (Remittance Companies)	Prior Evaluation (EDD)
Politically Exposed Persons PEPs (Direct and Indirect)	Prior Evaluation (EDD)
Correspondent Banks	Prior Evaluation (EDD)
Arms, Defense, Military (*)	Prior Evaluation (EDD)
Nuclear Material (*)	Prohibited
Extractive Industries	Prior Evaluation (EDD)
Precious Metals and Stones (*)	Prior Evaluation (EDD)
Unregulated Charities	Prohibited
Regulated Charities	Prior Evaluation (EDD)
Adult Entertainment	Prohibited
Non-Governmental Organizations	Prior Evaluation (EDD)
Virtual Currencies (*)	Prior Evaluation (EDD)
Illegal Drugs	Prohibited
Embassies / Consulates	Prior Evaluation (EDD)

Online Gambling (*)	Prior Evaluation (EDD)
Games of Chance	Prohibited
Payment Service Provider (PSP)	Prior Evaluation (EDD)
Travel and Tourism Companies	Prior Evaluation (EDD)
Virtual Asset Service Providers (VASPs)	Prior Evaluation (EDD)
Payment Institutions (PI)	Prior Evaluation (EDD)

(*) Clients may be submitted for approval to the AML/CFT Executive Committee.
Other clients listed above are subject to Enhanced Due Diligence (EDD).

I. Performs Monitoring, Selection, and Analysis of Suspicious Operations and Situations where:

Clients, products, and services are monitored to detect and assess atypical or suspicious activities, in accordance with legal deadlines and responsibilities.

i. AML/CFT Tool

Uses an automated monitoring tool for clients and transactions, which identifies cases with potential indications of money laundering, terrorism financing, or proliferation financing through predefined rules and parameters.

ii. Tax Haven

Implements monitoring and analysis procedures related to operations or negotiations involving clients located in tax havens, which may present favorable taxation or corporate ownership secrecy under local laws.

iii. Reputational

Screens clients during their relationship using national and international restrictive lists and negative media databases to identify links to money laundering, terrorism financing, or proliferation financing, and to take appropriate actions.

m. Reports Suspicious Operations where:

Reports to competent authorities any operation or proposal characterized as having indications of money laundering, terrorism financing, or proliferation financing, as per current legislation.

Reports must be centralized and made by the lead institution of the Conglomerate, on behalf of the entity where the operation occurred, as set forth in BACEN Circular No. 3,978/2020 and CVM Resolution No. 50/2021.

n. Conducts Training for its Executives, Employees, Third Parties, and Business Partners where:

Establishes processes and procedures aimed at developing and promoting training and awareness programs for executives, employees, third parties, and business partners regarding the prevention of money laundering, terrorism financing, and the financing of the proliferation of weapons of mass destruction.

o. Performs Evaluation of the Effectiveness of the AML/CFT Program where:

The Governance, Risk, and Compliance Department must annually evaluate compliance with and the effectiveness of the policy, procedures, and internal controls related to the prevention of money laundering, terrorism financing, and proliferation financing (AML/CFT).

A Single Effectiveness Evaluation Report must be prepared for all institutions within the Prudential

Conglomerate and submitted for acknowledgment by the Audit Committee and the Board of Directors by March 31 of the year following the reporting date.

Additionally, an action plan must be prepared to address deficiencies identified through the effectiveness evaluation, and the implementation of this plan must be documented in a follow-up report. The action plan and follow-up report must be submitted for review by the Audit Committee, the Directorate responsible for BACEN Circular No. 3,978/2020, and the Board of Directors by June 30 of the following year.

The Directorate responsible for CVM Resolution No. 50/2021 must prepare an annual management report for the institutions of the Prudential Conglomerate regarding the effectiveness of the Internal AML/CFT Risk Assessment, including recommendations for improvements and monitoring of action plans (if applicable), to be submitted to Senior Management by April 30 of the following year.

The Internal Audit, within its role and responsibilities, conducts audits of business processes, including the AML/CFT Department, contributing to the improvement of risk management effectiveness and corporate governance.

p. Maintains Recordkeeping, Registration, and Analysis of Operations that:

Information and records of transactions and services provided are maintained in their original form or in electronic files, in accordance with the deadlines established by current legislation.

Preventive and detective analyses conducted on clients, employees, service providers, business partners, correspondent banks, and transactions are stored in compliance with the legal retention periods.

q. Update

The responsibility for updating this Policy lies with the Coordinator of the AML/CFT Executive Committee. The Policy is reviewed at least annually or whenever there are changes in current legislation and/or structural changes in the Institution.

r. Approval

The Board of Directors is responsible for approving this Policy.

Whenever there is a modification to the Policy, the document undergoes new approval, and the new rules take effect on the date of approval.

s. Disclosure and Formalization

The AML/CFT Policy is classified as public-use information and is made available to everyone to ensure awareness of its content and any updates.

All Conglomerate employees must read and understand the contents of this Policy, confirmed through a signed physical or electronic acknowledgment form.

t. Execution of the Institution's Adopted Guidelines

The measures adopted by the Institution based on this Policy and its AML/CFT Program aim to prevent products and services from being used in situations or operations of an illicit nature.

To ensure compliance with the guidelines of its AML/CFT Program, the Institution has established a series of procedures related to prevention, monitoring, handling of occurrences, and reporting, which must be followed by all employees, service providers, and business partners, as detailed in internal normative documents.

u. Legislation

Understanding Brazilian legislation governing the prevention of money laundering, terrorism financing, and proliferation financing (AML/CFT) is crucial to ensuring compliance.

The Coordinator of the AML/CFT Executive Committee is responsible for clarifying rules established by current AML/CFT legislation to employees, service providers, and business partners.

v. Compliance

The Institution is committed to ensuring full compliance with legal, regulatory, and internal AML/CFT requirements across all its business activities.

i. Social and Environmental Responsibility

Aware of its responsibilities to society and in compliance with CMN Resolution No. 4,945/2021, the Conglomerate has implemented the Social, Environmental, and Climate Responsibility Policy, which applies to all employees, clients, partners, and other stakeholders, and must be observed in accordance with the principles of relevance and proportionality.

ii. Anti-Corruption Law

The Conglomerate conducts its activities with integrity and honesty in its management practices and business operations, combating corruption and bribery in all its forms—especially by administrators, employees, third parties, business partners, and service providers.

It is vital that all these individuals are aware of and comply with national and international anti-corruption and anti-bribery laws, particularly Law No. 12,846/2013 (the “Anti-Corruption Law”).

To uphold its reputation and ensure compliance with the Anti-Corruption Law, the Institution has established the Code of Conduct as a normative instrument.

w. Final Provisions

In case of any doubt regarding compliance with this Policy and related documents, the Coordinator of the Institution’s AML/CFT Executive Committee must be consulted for proper clarification.