



“AML/FT POLICY”

PREVENTION POLICY  
MONEY LAUNDERING AND  
FINANCING TO  
TERRORISM

## PRESENTATION

This Money Laundering and Terrorism Financing Policy (“PLD/FT”) consolidates the principles and guidelines on how CB TECNOLOGIA E INTERMEDIACAO LTDA manages the risks of money laundering and other financial crimes for the preventing and combating money laundering and the financing of terrorism, in line with current legislation and regulations and best practices in national and international markets.

This Policy applies to services offered by CB TECNOLOGIA E INTERMEDIACAO LTDA, a legal entity governed by private law, headquartered at Rua Dr Celestino, nº 122, Room 611, Centro, Niteroi, CEP 24020-091, registered with the CNPJ/MF under No. 31.432.059/0001-82, hereinafter referred to simply as "CB SERVICOS", which provides intermediation services in the purchase and sale of crypto-assets in the digital market through of performing “peer to peer” operations, made possible through of renowned brokerages, such as the BINANCE SERVICES HOLDINGS broker LIMITED, a company incorporated and existing under the laws of Ireland, having its registered office at 6th Floor, South Bank House, Barrow St., Dublin 4, Ireland, registered under No. 704568, registered with the CNPJ under No. 45.165.233/0001-82, and who are responsible not only for the carrying out KYC and compliance procedures that verify the integrity of their users, but also for the maintenance of the systems used.

This Money Laundering and Terrorism Financing Prevention Policy (“PLD/FT Policy”) of CB SERVICOS, is conducted through rules of conduct, norms, procedures and internal controls, establishing an integrated management of risks of money laundering, terrorist financing and financial illicit.

This Policy will identify the concept of money laundering, the steps that configure the offense and the characteristics of individuals and products susceptible to involvement with this crime. Money laundering operations will also be typified, identifying the controls used by CB SERVICOS and defined the rules for application of the forms “Know Your Customer” (KYC). Knowledge of any evidence of money laundering must be communicated to the Internal Controls and Compliance department (“Compliance”), which is responsible for verifying the information reported and, if applicable, communicating it to Organs regulatory bodies.

This Policy is part of the CB SERVICOS Compliance Program, which aims to guide and demonstrate the control of CB SERVICOS organizational behavior and compliance alignments, through a complex of internal controls and procedures, which enshrine the Corporate Governance narratives: transparency, equity, accountability and corporate responsibility.

## SUMMARY

|   |    |
|---|----|
| 1. PURPOSE.....   | 5  |
| 2.CONCEPTS.....   | 5  |
| 3.REFERENCE.STANDARDS.....  | 7  |
| 4.RESPONSIBILITIES.....   | 8  |
| 5. MONITORING AND TREATMENT OF INDICATIONS OF MONEY LAUNDERING.....                     | 9  |
| 6. PROCEDURES TO PREVENT UNLAWFUL ACTS OF MONEY LAUNDERING AND FINANCING.TERRORISM..... | 11 |
| 7. PROTECTION OF PERSONAL DATA.....   | 18 |
| 8.COMMUNICATION.....  | 19 |
| 9.ETHICS AND COMPLIANCE COMMITTEE.....  | 19 |
| 10.COMPLIANCE DEPARTMENT.....   | 20 |
| 11.SENIOR MANAGEMENT SUPPORT.....   | 20 |
| 12.REGISTRATION UPDATE.....   | 21 |
| 13. COMPLAINT CHANNEL.....  | 22 |
| 14. APPLICABLE LAW AND JURISDICTION.....  | 22 |
| 15. APPROVAL AND TERM.....  | 23 |

## 1. PURPOSE

1.1. This Policy aims to guide the performance of the CB SERVICOS in accordance with current legislation and regulations on preventing and combating money laundering and the financing of terrorism, establishing a structure of specific controls to make it difficult, preventing and reporting crimes of this nature, as well indicating parameters for applying the risk-based approach effectively.

1.2. CB SERVICOS establishes this policy with the aim of preventing its participation in illegal activities and to watch over and protect its name, reputation and image before employees, customers, service providers, regulators and inspectors and, society, through a governance structure oriented towards transparency, strict compliance with rules and regulations and cooperation with law enforcement and judiciary.

1.3. CB SERVICOS continually seeks to be aligned with the best market practices for preventing and combating illicit acts, including money laundering and terrorist financing, through investments and continuous training of its employees.

1.4. This Policy must be observed by all customers, employees and service providers of CID 8, regardless of their respective position or area of activity.

## 2. CONCEPTS

2.1. The concepts and acronyms below refer to terms present throughout this Policy:

- a) **ANBIMA**: Brazilian Association of Financial and Capital Market Entities;
- b) **BACEN**: Central Bank of Brazil;
- c) **CEIS**: Register of Disreputable and Suspended Companies;
- d) **CEPIM**: Registry of Impeded Non-Profit Private Entities;
- e) **Financial Activities Control Council (“COAF”)**: body (Brazilian Financial Intelligence Unit) responsible for the application of administrative sanctions, from the receipt, examination and identification of suspicious occurrences of illicit money laundering and terrorist financing activities, in addition to proceeding with the communication to the competent authorities for the establishment of the appropriate procedures, when the conclusion of the existence of well-founded indications of money laundering crimes and terrorist financing;
- f) **CNEP**: National Register of Punished Companies;
- g) **Stages of the money laundering crime**: The money laundering process involves three stages, namely: placement, concealment and integration. Placement is the stage in which the criminal introduces the illicitly obtained money into the economic system through deposits, purchase of negotiable instruments or purchase of goods. It deals with the removal of the money from the place that was illegally acquired and its inclusion, for example, in the financial market. Concealment is when the agent performs suspicious transactions and characteristics of the crime of laundering. At this stage, several complex transactions are set up to disassociate the illegal source of money. In integration, the illegal resource definitively integrates the economic and financial system. From this moment on, the money takes on a lawful appearance;

- h) **FBI**: Federal Bureau of Investigation;
- i) **FEBRABAN**: Brazilian Federation of Banks;
- j) **GAFI/FATF**: Financial Action Task Force against Money Laundering and Terrorist Financing (intergovernmental organization);
- k) **INTERPOL**: International Criminal Police Organization;
- l) **Know Your Client (“KYC”)**: “Know Your Client” procedure that aims to identify, verify, validate and qualify clients, so that it is possible to appreciate, evaluate and classify the client in order to know their profile risk and its ability economic-financial;
- m) **Know Your Employee (“KYE”)**: Due diligence procedure in the admission and hiring of employees;
- n) **Know Your Partner (“KYP”)**: Due diligence procedure for partners;
- o) **Money Laundering**: consists of carrying out commercial or financial operations with the purpose of incorporating illicitly obtained resources, goods and services;
- p) **OFAC**: Office of Foreign Assets Control;
- q) **PEP**: Pursuant to Bacen Circular No. 3,978/20, PEPs are considered to be public agents who perform or have performed, in the last 5 (five) years, in Brazil or in foreign countries, territories and dependencies, positions, jobs or public functions relevant people, as well as their representatives, family members and other people in their close relationship;
- r) **UNSC**: United Nations Security Council.

### 3. REFERENCE STANDARDS

3.1. The rules below were used by CB SERVICOS in order to equate this AML/FT Policy:

- a) Circular 3,680/13 of the Central Bank of Brazil;
- b) Circular 3,461/09 of the Central Bank of Brazil;
- c) Circular 3,978/20 of the Central Bank of Brazil;
- d) Circular Letter 4001/20 of the Central Bank of Brazil;
- e) Resolution 4,753/19 of the Central Bank of Brazil;
- f) Resolution 4,474/16 of the Central Bank of Brazil;
- g) CVM Instruction 301/99;
- h) CVM Instruction 534/13;
- i) CVM Instruction 617/19;
- j) Law No. 12,846/2013 - Anti-Corruption Law (Brazilian law against practices, among others, active corporate corruption of public officials or related persons);
- k) Law No. 9,613/98;
- l) Law No. 12,850/13;
- m) Law No. 13,506/17;
- n) Law No. 13,810/19;
- o) MP 893/19;
- p) ANBIMA self-regulation;
- q) FEBRABAN self-regulation;
- r) ABCRIPTO self-regulation;
- s) FATF/FATF recommendations.

#### 4. RESPONSIBILITIES

4.1. It is the responsibility of CB SERVICOS to maintain appropriate policies, procedures and controls to mitigate and address compliance and legal risks, especially with regard to preventing money laundering (“PLD”) and combating the financing of terrorism (“CFT”).

4.2. CB SERVICOS emphasizes that it is responsible for combating the inflow of capital originating from illicit, spurious and criminal activities and adopts the necessary measures to prevent financial crimes and conduct contrary to the values of probity internalized in its business philosophy.

4.3. Thus, in order for the guidelines of this policy to be applied, the CB SERVICOS Compliance Program includes:

a) System of internal controls to verify and establish the compliance of each area of CB SERVICOS;

b) Training of Management and its employees to align with an integral culture of compliance with rules, good practices, ethical values and compliance procedures;

c) Structuring the Compliance Department;

d) Existence of clear policies and procedures;

e) Client Due Diligence Procedures, carried out under the Know Your Customer (KYC) program;

f) Third Party Due Diligence to understand the risks inherent to the relationship (image, bribery and corruption risks) through Know Your Partner (KYP) and Know Your Employee (KYE) programs.

4.4. CB SERVICOS operates with monitoring tools (operations and registration), risk classification, alerts, analysis and communication to COAF, for the detection of operations and suspicious situations of PLD/FT and the tool for performing Due Diligence Analysis using reputational bases such as lists of national sanctions, politically exposed person (PEP), international restrictive lists, among others.

4.5. CB SERVICOS does not carry out partnerships and does not have relationships with countries that are on the list of national sanctions, or with clients that are on the national and international sanctions list.

## 5. MONITORING AND TREATMENT OF INDICATIONS OF MONEY LAUNDERING

5.1. The CB SERVICOS employs monitoring tools capable of generating alerts based on the following factors:

- a) the financial services used;
- b) the client's risk profile ("Risk Based Approach");
- c) category of crypto asset;
- d) movement of resources incompatible with the patrimony, economic activity or professional occupation (economic-financial capacity);
- e) concealment of the final beneficiaries or third parties involved;
- f) significant fluctuation in the volume or frequency of transactions;
- g) splitting of payments;
- h) compatibility of the movement with the market situation;
- i) indications of the use of obfuscation methods (mixing);
- j) suspicious wallets.

5.2. As a preventive measure, CB SERVICOS does not provide or provide services to Politically Exposed Persons (PEPs).

5.3. The CB SERVICOS monitoring routines are structured as follows:

- a) Use of artificial intelligence technology, data analytics and algorithms to monitor the flow of payments, transactions, identify behavioral fluctuations in relation to volume, frequency and modality, analysis of various factors;
- b) Alert of financial transactions that indicate strong suspicion of money laundering;
- c) More diligent and special checking of clients who qualify as PEPs (Politically Exposed Persons) and other high-risk profiles, with regular checks and research through databases that confirm the validity of the data presented, in addition to the application of surveys that identify circumstances that demonstrate different levels risk associated initially;
- d) Research of negative notes in the media and periodic checking of the restrictive lists available, in order to determine whether the relationship with the customer can lead to possible image risks for the company and its strategic partners, in addition to identify the existence of customer involvement in cases of money laundering or terrorist financing;
- e) Compliance analysis of the information and documents provided by the CB SERVICOS client by searching the different types of records available.

5.4. In order to assist in the monitoring of CB SERVICOS customers, CB SERVICOS points out the indicative list presented by Circular Letter BCB No. 4001, of January 29, 2020, including, but not limited to, the examples below:

a) Situations related to cash operations in local currency, such as making contributions that are unusual in relation to the client's economic activity or incompatibility with its financial capacity;

b) Situations related to the identification and qualification of customers, such as resistance to the provision of information necessary for the beginning of a relationship or for the registration update, offering false information or providing information that is difficult or costly to verify, presentation of irregularities related to procedures identification and registration of operations required by current regulations, whether or not followed by the termination of the business relationship;

c) Situations related to Employees, Partners and outsourced service providers, such as an unusual change in the standards of living and behavior of the employee or representative, without apparent cause.

5.5. In accordance with the provisions of applicable regulations, the selection of operations and situations that may constitute evidence of money laundering or terrorist financing crimes is carried out by the CB SERVICOS within a maximum period of 45 (forty-five) days from the date of the operation or situation, where the decision to report to the COAF must be taken by the last day of this period.

## 6. PROCEDURES TO PREVENT UNLAWFUL ACTS OF MONEY LAUNDERING AND TERRORISM FINANCING

6.1. Because CB SERVICOS is responsible for maintaining appropriate policies, procedures and controls to mitigate and address compliance and legal risks, especially with regard to preventing money laundering ("PLD") and combating the financing of terrorism ("CFT"), ICD 8 established procedures to prevent and combat illegal acts, including for PLD/CFT, using best market practices, as detailed below:

### 6.2. KNOW YOUR CUSTOMER (KYC)

6.2.1. The primary purpose of the KYC procedure is to protect CB SERVICOS<sup>8</sup> from engaging in illicit activities, as well as sanctioned individuals, jurisdictions or entities, and to ensure that CB SERVICOS fully complies with all relevant laws, regulations or standards pertaining to the scope of PLD/ CFT, since CB SERVICOS carries out "peer to peer" operations, made possible through digital platforms of renowned brokerages, such as the brokerage BINANCE SERVICES HOLDINGS LIMITED, a company incorporated and existing under the laws of Ireland, having its registered office at 6th Floor, South Bank House, Barrow St., Dublin 4, Ireland, registered under No. 704568, registered with the CNPJ under No. 45.165.233/0001-82.



6.2.2. Although the digital platforms provided by the brokers used by CB SERVICOS so that you can provide your services already have their own KYC and compliance, CB SERVICOS sought to implement its own KYC and compliance plan, in order to protect against any risks, even potential ones.

6.2.2.1. The choice of carrying out the operation by the platform of the brokers used by CB SERVICOS, as the broker BINANCE SERVICES HOLDINGS LIMITED, a company incorporated and existing under the laws of Ireland, with registered office at 6th Floor, South Bank House, Barrow St., Dublin 4, Ireland, registered under No. 704568, registered in the CNPJ under nº 45.165.233/0001-82, has the objective of protecting the client by promoting the performance of two KYC procedures.

6.2.3. The KYC procedure aims to identify the real owners of the assets and resources that circulate in CB SERVICOS, being the most important element in the process of preventing money laundering and terrorist financing, aiming to provide guidance and standardization for the initiation, maintenance and monitoring the relationship with those who use or intend to use CB SERVICOS products and services.

6.2.4. The procedure includes the prior verification strategy, in which all customers wishing to transact with CB SERVICOS have their information meticulously analyzed, as a way of avoiding doing business with suspicious agents or potentially criminals. Therefore, CB SERVICOS reserves the right to refuse to carry out transactions with customers whose criminal records and records contain markings or notes of negative and discrediting occurrences or facts.

6.2.5. The CB SERVICOS KYC program starts with the first contact of the client with the CB SERVICOS, when he/she expresses his/her interest in transacting crypto-assets through "peer-to-peer" transactions. peer" through the virtual platforms of the brokerage firms where CB SERVICOS has its operations, such as the brokerage BINANCE SERVICES HOLDINGS LIMITED, an established and existing company under the laws of Ireland, with registered office at 6th Floor, South Bank House, Barrow St., Dublin 4, Ireland, registered under No. 704568, registered with the CNPJ under No. 45.165.233/0001-82.

6.2.6. If the client carries out transactions with CB SERVICOS outside the virtual platforms of the brokers where CB SERVICOS has its operations, a more thorough and robust analysis of the client will be carried out by CB SERVICOS.

6.2.7. When being contemplated with an offer to buy or sell, CB SERVICOS first collects basic information about its customers, such as their full name, CPF/CNPJ, Federative Unit of origin and name of parents (if possible), if deal with an individual.

6.2.8. Once such information is acquired, its content is sent to the external law firm, responsible for processing it for the purpose of carrying out the opinion procedure on the Know Your Client of CB SERVICOS.

6.2.9. Armed with such information, the person responsible for compliance will enter it in specialized anti-fraud software, provided by the following approved supplier contracted by CB SERVICOS:

• SUPPLIER: IDWALL TECNOLOGIA LTDA. - CNPJ: 24.934.106/0001-20. Avenida Paulista, no 2537, 12o andar, bairro Bela Vista, CEP 01311-300, São Paulo, São Paulo.

6.2.10. The software used by CB SERVICOS carries out an in-depth search for the customers whose information was consulted, whether individuals or legal entities.

6.2.11. If the client who wants to take advantage of the services provided by CB SERVICOS is a legal entity, the surveys carried out will be directed towards ascertaining whether i) there are Politically Exposed Persons (PEP) in its corporate structure; ii) if there was a change in the corporate structure in the last 12 (twelve) months; iii) if the company's partners have a criminal history related to illicit practices of Law No. 9,613/98, Law No. 12,846 and related; iv) whether there are specific regulations or rules in the company on Anti-Corruption, Money Laundering and Terrorist Financing practices; vii) if the company has a Compliance Program and how it is done; viii) How is the Know Your Customer Process (KYC)", "Know Your Customer Partner (KYP)" and "Know Your Supplier (KYS)" and other pertinent information.

6.2.12. During the analysis, information from CB SERVICOS customers will be used for consultation in a range of registries and public records, such as:

- i) National Council for the Control of Financial Activities – COAF;
- ii) Center for Studies and Functional Improvement – CEAF;
- iii) National Register of Punished Companies – CNEP;
- iv) Ministry of Labor – MTE;
- v) National Council of Justice – CNJ;
- vi) Electronic Process Door – PPE.

6.2.13. Additionally, the database records of various authorities government agencies are also consulted, such as:

- i) List of European Union – EU Sanctions;
- ii) American Federal Intelligence Center – FBI;
- iii) UK Sanctions List – GOV UK;
- iv) International Criminal Police Organization – INTERPOL;
- v) US Foreign Assets Control Agency – OFAC;
- vi) United Nations Security Council – UNSC.

6.2.14. Additionally, information regarding:

- i) Legal proceedings linked to the customer's name;
- ii) Financial information;
- iii) Existence of protests;
- iv) National and international restrictive lists;
- v) Deny list;
- vi) Criminal record.

6.2.15. After the searches, the resulting file of the searches is sent by the external office of advocacy to the sole partner and director of CB SERVICOS, Mr. YAGO CARVALHO SALATHIEL, together with of a recommendation of approval or disapproval of the client, formulated by the person in charge by compliance based on the notes made by the software itself.

6.2.16. Only after full verification of customer information in the combating fraud, CB SERVICOS will decide whether or not to negotiate any types of crypto assets.

6.2.17. CB SERVICOS reserves the right not to serve or accept Politically Exposed Persons.

### 6.3. RISK APPROACH

6.3.1. In line with the GAFI/FATF recommendations and other reference standards, the Policy is made in particular through the Risk Approach procedure (identification of risk determination factors), in order to detect suspicions in operations and report them. The risks are subdivided into:

- a) **High Risk:** The risks are significant, but not necessarily prohibited. CB SERVICOS should apply more stringent controls to reduce risk, such as enhanced due diligence and stricter monitoring.
- b) **Medium Risk:** Risks need further analysis.
- c) **Low Risk or Standard:** Represents the Base Risk for which normal business rules apply.

6.3.2. Each CB SERVICOS customer and partner receives a risk designation according to their profile, which largely guides the steps to be appropriately applied.

6.3.3. Treatment based on balancing risks ensures that those risks with the greatest negative impact will be treated differently.

6.3.4. The risk assessment mechanisms and metrics were developed in line with the specifics of the CB SERVICOS business model and its size.

6.3.5. This measurement occurs through the creation of matrices that present weightings on the risk factors, given below:

#### i) Criminal prosecution

- a) terrorism, including terrorist financing;
- b) trafficking in human beings and smuggling of migrants;
- c) sexual exploitation, including of children;
- d) money laundering;
- e) participation in organized criminal groups and organized crime;
- f) trafficking in narcotics and psychotropic substances;
- g) arms trafficking;
- h) corruption and bribery;
- i) fraud;
- j) administrative impropriety;
- k) crimes against the SFN (Law 7492/86);
- l) counterfeiting of currency;
- m) counterfeiting and piracy of products;
- n) environmental crimes;
- o) lobbying (acts of pressure on people or public authorities);

- p) homicide, serious bodily harm;
- q) kidnapping, illegal deprivation of liberty and hostage taking;
- r) robbery or theft;
- s) contraband;
- t) tax crimes (related to direct and indirect taxes);
- u) extortion;
- v) forgery;
- w) piracy; and
- x) use of privileged information and market manipulation;

**ii) PEP or PPE (Politically Exposed Person)**

a) Special attention is paid to operations carried out by people who fall into this category and to those who have a close relationship with PEPs, since they are agents who are more exposed to the practice of illicit acts and offer greater risk to the National Financial System.

**iii) Domicile in a non-cooperating country (Specially Designated Nations)**

- iv) Sanctions on restrictive lists
- v) Geographic Location
- vi) Negative media

**6.4. KNOW YOUR EMPLOYEE (KYE)**

6.4.1. The CB SERVICOS KYE procedure encompasses a set of rules, procedures and controls for selection, hiring and monitoring of situations that may characterize any type of risk or diversion, for the purpose of preventing money laundering, financing terrorism and other illicit acts.

6.4.2. CB SERVICOS values behavioral investigation, reprimands for unethical conduct and management of conflicts of interest that are capable of compromising the organizational culture CB SERVICOS in its entirety.

6.4.3. In this sense, our Compliance Department:

- a) Apply periodic due diligence;
- b) Conducts questionnaires;
- c) Performs background checks;
- d) Conducts training and establishes an open dialogue;
- e) Evaluates relationships with public bodies;
- f) Uses anti-corruption clauses in all instruments that regulate relationships between the parts.

## **6.5. POLITICALLY EXPOSED PERSONS (PEP)**

6.5.1. CB SERVICOS pays special attention during registration, contracting, updating information, providing services and monitoring customer operations and employees, since it is careful not to operate, serve or hire people politically exposed.

## **6.6. REGISTRATION AND MONITORING OF TRANSACTIONS**

6.6.1. Financial operations carried out by CB SERVICOS clients must be registered and constantly monitored to determine situations that may indicate signs of occurrence of money laundering or terrorist financing, taking into account the situations determined in the sector's norms and, especially, the condition of people politically exposed.

## **6.7. TRAINING**

6.7.1. CB SERVICOS PLD/CFT training is ongoing and must be applied to all eligible employees, so that risks are mitigated and deviations from the Policy are avoided.

6.7.2. The trainings aim to:

- a) Clarify the legal responsibilities of each of those involved;
- b) Provide support and knowledge about the applicable procedures and regulations;
- c) Deepen the knowledge that employees have of the requirements and responsibilities legal and regulatory, as well as the CB SERVICOS guidelines regarding the AML/CFT topic;
- d) Empower employees to identify, prevent, treat and communicate risk situations or with evidence of money laundering or terrorist financing in the performed activities.

6.7.3. CB SERVICOS understands that the training of its employees is crucial for this Policy is effective and meets its objectives.

## **7. PROTECTION OF PERSONAL DATA**

7.1. The collection, access and processing of personal data of customers, employees and individual suppliers of CB SERVICOS is necessary for the fulfillment of the obligations of this Policy, in compliance with the General Data Protection Law (Law No. 13,709, of August 14, 2018).

7.2. However, it is the duty of CB SERVICOS, its employees and suppliers, to cherish the security and privacy of the personal data processed, as well as its use within the limits necessary for the purpose proposed here, always with transparency and in compliance with current legislation, as well as the CB SERVICOS Privacy Policy .

## 8. COMMUNICATION

8.1. Situations with indications or evidence of illicit acts, identified during the relationship, must be reported immediately to the Ethics and Compliance Committee.

8.2. The Ethics and Compliance Committee will decide on the communication to the Financial Intelligence (“COAF”) of suspicious and atypical activities, based on a report of identification of the activities mentioned in the “MONITORING AND TREATMENT OF INDICATIONS OF MONEY LAUNDERING”. The communication period is up to 45 (forty-five) days from the identification of the activity. Regardless of communication, CB SERVICOS will keep documentation related to activities.

8.3. Disciplinary sanctions will be applied to individuals who attempt or retaliation against anyone who, in good faith, reports or expresses a complaint, suspicion, doubt or concern regarding possible violations of the guidelines of this Policy; and provide information or assistance in investigations relating to such possible violations.

8.4. Sanctions should also be applied to individuals who demonstrably use in bad faith when reporting possible violations of the guidelines of this Policy or communicate facts that are known to be false.

8.5. Suppliers who withhold information or act contrary to this Policy, in addition to legal sanctions, their service provision contract may be terminated, subject to a fine, subject to contractual provisions.

## 9. ETHICS AND COMPLIANCE COMMITTEE

9.1. The CB SERVICOS Ethics and Compliance Committee is composed of Executive Directors from each CB SERVICOS area, and chaired by the person in charge of the Compliance Department. It's on the Committee that decision-making that may involve regulatory and prevention of money laundering. It is his responsibility to identify potential risks, defining metrics and handling any incidents identified.

## 10. COMPLIANCE DEPARTMENT

10.1. The CB SERVICOS Compliance Department is exercised through a direct channel in the CB SERVICOS company that hires a law firm to prepare OPINIONS on approval and disapproval, using the supplier COMBATEAFRAUDE S.A. CNPJ: 34,102,645/0001-57. R. Tiradentes, 1077 - 5th floor – Centro- Venâncio Aires - RS, 95800-000.

10.2. The Compliance Department, together with the external law firm, works with the following responsibilities:

- a) Identify and assess the Compliance risks of risk owner managements;
- b) Direct and train stakeholders, directors, managers and all employees in Compliance matters;
- c) Continuously monitor and report new Compliance risks identified in the Business;

- d) To prepare, together with the managements responsible for each business area, the policies and procedures which must be aligned with the CB SERVICOS Code of Conduct and Ethics, mitigating the risks already mapped;
- e) Advise the Administration and the business areas in decision-making involving scratches.

## **11. SENIOR MANAGEMENT SUPPORT**

11.1. CB SERVICOS understands that Compliance within the company must be independent and that its functions correspond to:

- a) Enable adherence to and compliance with laws, rules and regulations applicable to the business;
- b) Assess compliance with ethical Principles and Rules of Conduct;
- c) Implement and update internal regulations and standards;
- d) Establish Procedures and Internal Controls;
- e) Apply periodic tests and prepare contingency plans;
- f) Assess the segregation of duties in order to avoid conflicts of interest;
- g) Evaluate Risks and Internal Controls, through a report (Compliance Management);
- h) Develop Internal Policies that prevent non-compliance problems;
- i) Foster the development of the Culture of: (a) prevention of money laundering through specific training; (b) control, together with the other pillars of the system internal controls, in the pursuit of compliance; (c) interlocution with Bodies Regulators and Supervisors, Class Associations and important participants in the Marketplace; (d) promotion of the professionalization of the function and assistance in the creation of mechanisms for reviewing relevant market rules, legislation and regulations.

## **12. REGISTRATION UPDATE**

12.1. CB SERVICOS must identify substantial and relevant changes in the information that have about their customers in order to properly feed their systems and measure the risks involved in their relationships. The information must be updated annually.

12.2. The accuracy of the registration data is the substrate for carrying out the monitoring operations, enabling the analytical identification of situations that constitute evidence of money laundering and terrorist financing.

## **13. COMPLAINT CHANNEL**

13.1. CB SERVICOS has a communication channel that allows the receipt of complaints with regard to irregularities, even admitting anonymous denunciations, being prohibited retaliation from whistleblowers. The channel is intended for both the internal audience and the public external: [quero@comprarbitcoin.com.br](mailto:quero@comprarbitcoin.com.br).

13.2. CB SERVICOS guarantees confidentiality and protection for the whistleblower in good faith, using a transparent procedure regarding the follow-up of the whistleblower.

13.3. The report will be handled by the Compliance Department, which is responsible for take the depositions of the parties involved, examine existing documentation, if any, and carry out whatever is necessary to take measures and penalties applicable to depending on the final decision of the IADC Board of Directors 8.

13.4. The direct channel of the Executive Board will be in charge of the responsible Director through the e-mail: [otc@comprarbitcoin.com.br](mailto:otc@comprarbitcoin.com.br).

13.5. The direct channel of the Ombudsman will be in charge of the responsible Director via email: [suporte@comprarbitcoin.com.br](mailto:suporte@comprarbitcoin.com.br).

13.6. The direct channel in case of an emergency, a whistleblower channel or cases in which all areas must be contacted by e-mail [suporte@comprarbitcoin.com.br](mailto:suporte@comprarbitcoin.com.br) or through the messaging application through the number +55 (22) 99828-8789, working during business hours on weekdays.

#### **14. APPLICABLE LAW AND JURISDICTION**

14.1. This Policy is governed by Brazilian law. Doubts and situations provided for in this Policy will first be resolved by CB SERVICOS and, if they persist, must be resolved by the bodies of the Brazilian consumer protection system.

14.2. Any disputes or controversies arising from any acts performed within the scope of of the use of the Applications by customers and users of CB SERVICOS, including in relation to the non-compliance with this Policy or the violation of the rights of CB SERVICOS, its enterprises, of other users and/or third parties, intellectual property rights, confidentiality and personality, will be processed in the court of the Judicial District of the City of Niteroi, State of Rio de Janeiro, as being the only one competent to settle any dispute arising of this instrument, expressly waiving any other, however privileged whatever.

#### **15. APPROVAL AND TERM**

15.1. This document is approved by the Executive Board and is in force indefinite and must be reviewed annually or whenever necessary.