

CHAPTER	03 - ENROLLMENT
SECTION	MISCELLANEOUS

OBJECTIVE

Defining procedures for obtaining documentation, analysis and registration of customer registration information and those involved in LASTTRO TRADING product operations.

TARGET AUDIENCE

All LASTTRO TRADING employees involved in the customer registration process and operations.

CUSTOMER ENROLLMENT CONCEPT

Customer Enrollment is a generic term used to define the set of data and information, economic-financial, environmental and government licenses, of customers and service providers that allows monitoring the mineral origin, as well as creating parameters for the operations carried out on the day on a daily basis, based on these manuals.

The enrollment of mining companies and suppliers of precious metals also aims to guarantee the supply chain and the good origin of the metals acquired by LASTTRO TRADING, ensuring a transparent supply chain for the company, as well as its final customers.

The enrollment is intended for the detailed recording of information relating to these customers, entities, as well as their legal representatives.

In its normal course of business, LASTTRO TRADING does not do business with individuals, only with companies (entities), with which they have an affinity with its corporate purpose or provide services throughout the chain of its activities.

Customers are legal entities, domiciled or headquartered in Brazil or abroad, with whom LASTTRO TRADING carries out purchase and sale operations.

END BENEFICIARIES:

End Beneficiaries are natural persons who:

- Own, directly or indirectly, more than 25% of the share capital of an entity; or
- Exercise, predominantly, corporate resolutions and have the power to elect the majority of administrators authorized to represent the Corporate Customer as a chain of participation; or
- Represent legal entities constituted as a publicly held company or a non-profit entity; or
- In the case of Investment Funds, be their shareholders.

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CUSTOMER POLITICALLY EXPOSED PERSON (“PEP”)

Companies that maintain ties with individuals considered PEP - Politically Exposed Person, individuals who occupy or have occupied, in the last 05 (five) years, public positions, inside and outside the country, such as government officials, executives of government companies, political positions, such as: president, governors, mayors, deputies, senators and others, or related to PEP who are second-degree relatives or people considered to have a close relationship, under the terms of BACEN Circular 3.978, are subject to reinforced monitoring.

DOCUMENT SUPPORT

All documents requested by LASTTRO TRADING from its customers must meet the minimum requirements of current legislation, as well as the principles of a preventive nature and good market practices.

Once all the relevant documentation has been collected, it will be submitted for analysis and verification, and in case of discrepancy, the customer must be notified so that he can arrange for the adjustments.

The document analysis will cover queries to restrictive lists, as well as research of a reputational and criminal nature of the customer.

With a view to mitigating risks, LASTTRO TRADING may request additional documents and/or information depending on the specific case.

Without prejudice to the provisions of this section, as well as the duty to observe good practices, based on the economic basis and the responsibilities defined in the respective documentation, LASTTRO TRADING may, at its sole discretion, examine each case and focus on at risk, dispense with certain document(s) considered to be systemically non-relevant.

Registration forms and copies of supporting documents for customers must be kept on file for a period of five years, counting from the date of the last operation carried out with the customer.

The Enrollment Department must carry out verification tests, with a maximum frequency of 01 (one) year to ensure the adequacy of the registration data.

The PF (Individual) and PJ (Corporate) enrollment forms can be signed either physically or through a Digital Certificate.