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## **1. PURPOSE**

This policy establishes the principles and guidelines of LASTTRO TRADING for preventing money laundering and financing of terrorism and weapons of mass destruction ("AML/CFT"), in consonance with the legislation and regulations in force and good market practices, for identification of events that are atypical and may pose signs of Money Laundering and/or financing of Terrorism and weapons of mass destruction.

For the purposes of this policy, "Money Laundering" or Layering of Assets, Rights, and Property, means to layer or disguise the nature, source, location, disposition, movement or ownership of assets, rights or property originating, directly or indirectly, from a penal offense.

LASTTRO TRADING does not accept and will take the necessary actions against any form of transformation of resources originating from illegal activities into assets of apparently legal origin. Client knowledge, supported by training programs and the use of technological tools for monitoring financial transactions, aims to prevent the use of the company in transactions or situations that may be, directly or indirectly, linked to the crimes defined in Brazilian Law 9.613/98.

These actions, together with specific analyses, contribute with the full compliance of the institutional policy, allowing the protection of LASTTRO TRADING and its shareholders, officers, employees, clients, partners, and service providers.

## **2. REGULATORY ENVIRONMENT**

- Federal Law no. 9.613, of 3/3/1998, as amended;
- Federal Law no. 13.260, of 3/16/2016;
- Federal Law no. 12.846 of 8/1/2013;
- Federal Law no. 13.709 of 8/14/2018;
- COAF (UIF) Resolution no. 23/2012;
- COAF (UIF) Resolution no. 29/2017;
- RFB Normative Instruction no. 1571, of 7/2/2015;

## **3. COMBATTING MONEY LAUNDERING, TERRORISM FINANCING AND PROLIFERATION OF WEAPONS OF MASS DESTRUCTION ("AML/CFT").**

### **3.1 DEFINITION OF MONEY LAUNDERING**

Money laundering is an offense consisting of converting or transforming assets or money, obtained from illegal activities, into apparently lawful capital, or providing legal resources for use with illegal purposes, by placing such assets or money in the Financial System.

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### 3.2 DEFINITION OF TERRORISM FINANCING

Terrorism financing consists on raising awareness, layering or allocating resources for support or use in terrorist activities or organizations.

Terrorist financing differs slightly from money laundering because, in general, terrorists use money that has been legally obtained or laundered. Terrorists know that if they use money obtained illegally, there is a greater risk that they will be discovered before they can use it to finance their terrorist activities.

Money laundering and terrorism financing are two types of economic and financial crimes with devastating effects. In both cases, criminals or terrorists can explore the gaps and weaknesses in a lawful financial system, to launder any fund obtained illegally and support terrorist activities unless necessary protective measures are put in place.

Operations related to terrorism or its financing are those carried out by persons who carry out or plan to carry out terrorist acts, who participate in them or facilitate their practice, as well as by entities owned or controlled, directly or indirectly, by such persons and the persons or entities that act under their command.

### 3.3 DEFINITION OF FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

Financing of proliferation of weapons of mass destruction is the activity that provides funds, directly or indirectly, to support the dissemination of chemical, biological, and nuclear weapons and their launch. This is a relevant security issue, and the use of financial measures can be an effective way to fight this threat.

## 4. STAGES OF MONEY LAUNDERING

Money laundering aims to transform unlawful funds into alleged legal funds, and splits into three stages, as follows:

- **PLACEMENT** is the process that places unlawful funds into the Domestic Economic System, usually through cash deposits or payments, without calling the attention of financial institutions, legal authorities, or the government.

- **LAYERING** is the process whereby criminals try to make the accounting tracking of illicit funds as difficult as possible. Layering is typically characterized by carrying out a series of transactions involving different parties using wire transfers or other transfers of funds, often including “dummy” corporations or other fake organizations, non-existent financial products, and different financial institutions.

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- **INTEGRATION** is the last stage of money laundering and consists of controlling the illegal funds so that they can look legitimate. If successful, integration results in incorporating the illegal funds into the economy.

## **5. ROLES AND RESPONSIBILITIES**

### **5.1 EXECUTIVE BOARD IN CHARGE**

- Approve the LASTTRO TRADING AML/CFT guidelines and their respective revisions.

### **5.2 COMPLIANCE**

- Manage the AML/CFT program (comply with and enforce);
- Monitor client operations and the conduct of business channels;
- Coordinate AML/CFT training with employees and partners;
- Report to Risk and Compliance Committee all cases considered atypical or suspicious, found within the business environment at LASTTRO TRADING;
- Report to the COAF (UIF) any operations or situations suspected of being engaged in the crimes provided for in Law 9.613/98 upon resolution by the Risk and Compliance Committee;
- Adequately store in physical and/or digital media all documentation relating to AML/CFT activities for a minimum period of five years;
- Preparation of an annual report describing the effectiveness of the AML/CFT policy.

### **5.3 RISK AND COMPLIANCE COMMITTEE**

- Ensure with the Compliance Department that business channels are operating in accordance with LASTTRO TRADING AML/CFT policy;
- Previous evaluation of new products and/or services within the AML/CFT to identify any inherent risks and establish any preventive measures;
- Make decisions regarding communications to COAF (UIF) of any operations considered atypical and/or suspicious;
- Take decisions concerning the either temporary or permanent disqualification of clients to carry out operations.

### **5.4 REGISTRATION**

- Validate client information and keep it updated, in accordance with regulations, or at any time, if new relevant information arises, paying special attention to information related to Politically Exposed Persons;
- Apply and enforce verification procedures for registration information proportional to the risk of using products, services and distribution channels for money laundering and the financing of terrorism and weapons of mass destruction.

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- Classify active clients by level of risk, as provided for in the regulation.

## **5.5 INTERNAL AUDIT**

- Evaluate and test the effectiveness of internal controls related to AML/CFT.
- Issue analytical reports to Management and the Executive Board, highlighting points of vulnerability and/or opportunities for improvement.

## **5.6 ALL EMPLOYEES**

- Know and comply with the guidelines of this policy;
- Respond in a timely manner to requests for documents and clarifications made by the LASTTRO TRADING Compliance Department;
- Report to the Compliance Department any operations, proposed operations or unusual situations, as well as those that due to their form, value or course of dealing, constitute an artifice that aims to circumvent identification mechanisms, controls, and records at LASTTRO TRADING.

## **6. AML/CFT PROGRAM**

### **6.1 CLIENT CLASSIFICATION**

In view of the operational characteristics of LASTTRO TRADING, any client that trades in the precious metals market, in particular gold COMMODITIES, or FINANCIAL ASSETS and that is a legal entity, jewelry store, mining company, financial institution, or a foreign client, will be considered as Clients.

### **6.2 INFORMATION REQUIRED FROM CLIENTS**

Average monthly revenue values for the previous twelve months, and/or previous Balance Sheet, for legal entities, the signed statement on the purposes and nature of the business relationship with LASTTRO TRADING.

### **6.3 POLITICALLY EXPOSED PERSON (PEP)**

PEPs are any public officials who serve or have served, in the last five years, in Brazil or in foreign countries and their territories and dependencies, in public office, as well as their representatives, family members and other close people.

For Brazilian clients, PEP encompass holders of elective office from the executive and legislative branches of the government; those serving in the executive branch of the government; ministers of state or equivalent; of a special or equivalent nature; president, vice-president and director, or equivalent, of publicly-owned corporations; and the senior management and advisory group, level 6, or equivalent.

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Members of the national councils of justice, federal supreme court, superior courts, federal regional courts, regional labor courts, regional electoral courts, superior labor justice council, and federal justice council.

Members of the national council of the Public Prosecutor's Office, the Chief Prosecutor of Brazil, the Vice Chief-Prosecutor of Brazil, the General Counsel of Labor, the General Counsel of military justice, the deputy Chief Prosecutors of Brazil, the General Counsels for the State and the Federal District, members of the Federal Accounting Court, the Chief Prosecutor and Deputy Prosecutor with the Federal Accounting Court.

National presidents and treasurers, or equivalent, of political parties, governors and secretaries for the state and the federal district, state and district deputies, presidents, or equivalent, of state and district government-owned entities and presidents of courts of justice, military courts, courts of accounting, or equivalent for the states and the federal district.

Mayors, city councilors, presidents, or equivalent, of municipal government corporations, and presidents of accounting courts, or equivalent, of those municipalities.

Politically exposed people also refer to people who are abroad:

- Heads of state or government; higher-level politicians; holders of higher-level government positions, general officers and members of higher levels of the judiciary; senior executives of government companies, or leaders of political parties.

Politically exposed persons also encompass top management managers at public or private international entities.

In the event of foreign clients, the organization must adopt at least two of the following provisions:

- Request a written statement from client regarding its qualification;
- Refer to publicly available information; or
- Refer to public or private databases on politically exposed persons.

The condition of politically exposed person must be applied for five years following the date when the person ceased to be a PEP.

PEP also encompasses relatives, in a straight line, up to the second degree, spouses, partners, stepchildren, and close employees.

To begin the relationship, the Registration Area will characterize the client as a PEP through a query carried out on the list made available by the financial intelligence

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unit (FIU) of the Brazilian Anti-money Laundering Authority (COAF), as well as through a statement signed by the client.

Operations performed with a PEP will be subject to "reinforced and high-risk monitoring".

## **6.4 KNOW YOUR CLIENT (KYC)**

This is a set of procedures and rules adopted to ensure client's proper identification and main line of business, as well as the source and traceability of the mineral. Therefore, LASTTRO TRADING will protect its reputation and reduce the risks of its products and services from being used to legitimize funds from unlawful activities.

## **6.5 PURPOSE (KYC)**

The Know Your Client (KYC) policy is one of the pillars of the AML/CFT program, and its purpose is to inhibit the entry or retention of clients whose activities relate to money laundering and/or financing of terrorism or weapons of mass destruction.

### **6.6 GENERAL PROVISIONS (KYC)**

The concept of "Know your Client" is linked to client identification, which must be established before completing the deal. If he refuses or makes it difficult to provide the required information, LASTTRO TRADING will not accept it as a client.

All LASTTRO TRADING employees must be diligent in preventing money laundering and combating the financing of terrorism and weapons of mass destruction, thus preventing the occurrence of this wrongful practice. They must also promptly report any atypical or suspicious operations (or proposed operations) to the Compliance Department.

The achievement or maintenance of a relationship with a client must always be guided by the perspective of transparency and fairness of its activities, within the "Know Your Client" concept, and not just by the commercial interest and/or profitability that the client can provide in your relationship with LASTTRO TRADING.

### **6.7 GENERAL GUIDELINES (KYC)**

#### **6.7.1 CLIENT IDENTIFICATION AND VERIFICATION (KYC)**

Identification process usually applies at the beginning of the relationship. Identification is the action of confirming who a person alleges to be through the provision of information. Verification is the process of proving that a person is really who it alleges to be, through a thorough examination of documentation provided, i.e., the documentary evidence must be satisfactory and reliable in identifying and

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registering the client.

In the case of a legal person, it is essential to know the owner of the company and its shareholding composition until reaching the natural persons authorized to represent it, as well as its shareholding structure until reaching the natural person characterized as the final beneficiary, i.e. the one who has the controlling interest or significant influence in the management

#### **6.7.2 RESTRICTED LISTS (KYC)**

Restricted lists must always be checked when doing business with clients and when they update information. If the client is on an restrictive list or is mentioned in an illegal event broadcast by the media, the Compliance Department must be notified to evaluate the beginning or maintenance of the relationship.

Checking the following sources is mandatory:

- Brazilian Anti-money Laundering Authority (COAF): List of PEP – SISCOAF;
- Brazilian Revenue Service: Validation of CNPJ;
- Office of Foreign Assets Control (OFAC): United States Counterterrorism List;

#### **6.7.3 PURPOSE OF BUSINESS RELATIONSHIP (KYC)**

It is extremely important that a relationship is established with clients, proactively, with the aim of understanding the real interest that led them to seek out LASTTRO TRADING to carry out their operations.

#### **6.7.4 PREPARATION OF THE DIGITAL OR PHYSICAL REPORT (KYC)**

The registration documentation required by LASTTRO TRADING must be stored electronically or physically, including evidence of queries and research carried out during the registration process.

#### **6.7.5 MEET THE TRACEABILITY OF THE “GOLD” SUPPLY CHAIN (KYC)**

The compatibility between the company's activity, its assets, its presumed financial capacity, as well as the origin of the resources used and the traceability of the mineral origin, must be assessed.

For mining companies, assess if the monitor volumes produced, size and scale of their production activities, and other indicators are in accordance with the origin of the metal and transactional volumes.

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### 6.7.6 VISIT TO COMPANIES' FACILITIES (KYC)

The purpose of the visit is to understand the company's business and observe whether the mineral origin and volume traded are consistent with the type, scale, and size of the operation conducted by the company.

This is a practice of complementary analysis of company information, to measure and mitigate actual and potential risks, which are the responsibility of the manager, employee, representative or agent who is prospecting the new client, or negotiating with a current client.

The rule DOES NOT APPLY to clients having low and medium risk, and foreign clients.

### 6.7.8 MONITORING (KYC)

Monitoring process is extremely important within the AML/CFT program. Operations or situations that deviate from the expected standards must be reported to the Compliance Department for appropriate treatment. This action is essential to subsidize the report to the COAF (FIU).

Unflattering news and, mainly, those related to financial crimes must be continuously monitored in order to mitigate risks to image.

### 6.7.9 RISK-BASED APPROACH (KYC)

Risk factors, drivers, or indicators (*risk drivers*), must be observed under the conditions or characteristics that make a client susceptible to be used for money laundering; therefore, *compliance analyses* will take into account, among other aspects:

- The client's business segment and tradition;
- Nature of the activity and how long the customer has been in the market;
- The client's geographic location (high-risk jurisdictions and frontier regions);
- A client who is a PEP; and
- Source of funds (billing and equity).

In this context, LASTTRO TRADING will adopt reinforced measures to mitigate such risks and where the risks are lower, it may adopt simplified measures, without prejudice to due diligence regarding clients.

Active clients at the Company will be classified by degree of risk:

#### **LOW RISK:**

Legal Person Clients – (Banks and Metal Refining Plants).



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**MEDIUM RISK:**

Legal Person Clients – (Jewelry Stores, Mining Companies, and Foreign clients with over 12 months of activity).

**HIGH RISK:**

Legal Person Clients – (Jewelry Stores, Mining Companies, and Foreign clients with less than 12 months of activity).

Clients classified as HIGH RISK must prove bank reference and banking qualification.

All new products and services will be previously analyzed by the Compliance Committee in order to identify vulnerabilities from the perspective of preventing money laundering.

Any changes to registration information that are considered as aspects for classifying the Risk-Based Approach may change the client's risk level.

**6.7.10 PREPARATION AND UPDATE OF REGISTRATION (KYC)**

The registration documentation of clients considered permanently active must be renewed at intervals not exceeding 24 months, whereas permanent clients who present a high risk will be renewed at intervals not exceeding 12 months.

**6.8 KNOW YOUR EMPLOYEE (KYE)**

This is a set of procedures and rules adopted for recruiting and monitoring employees under the AML/CFT.

**6.8.1 PURPOSE (KYE)**

The Know Your Employee (KYE) policy is established based on ethical and behavioral values and aims to establish guidelines that aim to mitigate the risk of engaging LASTTRO TRADING in unlawful practices of any nature, including, without limitation, money laundering and the financing of terrorism and weapons of mass destruction.

**6.8.2 CRITERIA FOR RECRUITMENT (KYE)****6.8.2.1 SELECTION (KYE)**

Any hiring need will be carefully analyzed, in order to verify that there is no possibility of internal use of resources.

Once this possibility has been exhausted, the requesting area will define the

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technical requirements and desired profile of the professional to be hired.

Recruitment and selection at LASTTRO TRADING will include checking the candidate's professional background, as well as the existence of discrediting facts.

The approved candidate will be sent to the administrative department, for the following actions: (i) medical examination; (ii) documentation required for hiring under the Brazilian Consolidation of Labor Laws (CLT).

#### **6.8.2.2 HIRING (KYE)**

In possession of the medical examination and all documentation requested by LASTTRO TRADING, the administrative department will properly formalize the agreement with the respective professional.

If the person hired is a legal person, LASTTRO TRADING will request a copy of the Articles of Organization.

The professional hired will receive the "ICM – AML/CFT" and sign an "Acknowledgment of Receipt" with LASTTRO TRADING in two (2) copies, the original document will be kept in the employee's record and the copy will be kept with the employee. All process will be formalized via Minutes.

#### **6.8.2.3 FOLLOW-UP (KYE)**

If LASTTRO TRADING detects a sudden change in the economic pattern of its employees, it will take reasonable actions to identify possible unlawful activities.

### **6.9KNOW YOUR PARTNER (KYP)**

This is a set of procedures and rules adopted to ensure the proper identification and good reputation of the future service provider to carry out operations or services provided on behalf of LASTTRO TRADING, as well as control and surveillance mechanisms.

#### **6.9.1 PURPOSE (KYP)**

LASTTRO TRADING understands that business partnerships are important for its business model; however, it recognizes that it can pose a potential risk if not properly assessed and managed.

Based on good market practices, LASTTRO TRADING requires all its employees to properly identify the new Partner prior to starting a relationship and concluding an agreement.

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In this context, LASTTRO TRADING has implemented this procedure called Know Your Partner (KYP), which applies to all service providers who conclude Service Agreement ("Agreement") to carry out operations in the gold market and services provided to LASTTRO TRADING.

#### **6.9.2 GENERAL GUIDELINES (KYP)**

Start relationships only with Partners that meet the applicable legal requirements;  
Have open and honest dialog with Partners under good commercial practices;  
Protect any confidential information pertaining to LASTTRO TRADING, whether by its own nature or as a result of the agreement signed with the Partner.

#### **6.9.3 DUE DILIGENCE (KYP)**

At LASTTRO TRADING, the approval process for new Partners will be based on "due diligence" and rely on coordinated action from the departments involved, as described below.

#### **6.9.4 DOCUMENTATION (KYP)**

The process is coordinated by the compliance department, which prepares a report containing the Partner's information and documents. All information and documents must meet LASTTRO TRADING's prerogatives, in addition, they must be obtained within the criteria of reasonableness and materiality.

#### **6.9.5 APPROVAL (KYP)**

LASTTRO TRADING's Risk and Compliance Committee will evaluate all aspects, especially the "reputational" one, using all control mechanisms and publicly available information.

Depending on the specific case, the Risk and Compliance Committee may request additional documents and/or information from the company for additional assessment (with a focus on risk).

Approval or refusal will be formalized in the Meeting Minutes and must be duly filed by the Compliance department.

#### **6.9.6 IMPEDITIVE FACTS (KYP)**

LASTTRO TRADING will not accept as a partner:

- Companies potentially involved with negative images and possible criminal practices;
- Companies whose documentation and/or conduct do not allow identifying the lawfulness of their activities;

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- Existence of facts, which, at the discretion of LASTTRO TRADING, bring the company and its owners into disrepute.

## **7. CRITERIA FOR PAYMENT AND RECEIPTS**

### **7.1 PURCHASING OPERATIONS**

Purchasing operations (*gold or other precious metals*) must be paid by LASTTRO TRADING through:

- a) Wire Transfer or any other bank transfer order for funds, including international SWIFT, issued to the seller and for the funds to be credited to the deposit account held by them;

### **7.2 SALES OPERATIONS**

*Sales and exports* can be received by LASTTRO TRADING through:

- a) Wire Transfer or any other bank transfer order for funds, including international SWIFT, international shipments, issued to the buyer and for the funds to be debited to the deposit account held by them;

## **8. TRAINING**

AML/CFT training is mandatory for "all" LASTTRO TRADING employees, as well as everyone directly involved in the operation.

Training can take place in person or online, and in partnership with specialized companies or professional entities, with recognized technical capacity and approved by LASTTRO TRADING.

All training must contain the topic concerning the "PREVENTION OF MONEY LAUNDERING AND THE FINANCING OF TERRORISM AND WEAPONS OF MASS DESTRUCTION" and verification of good mineral origin, with a minimum workload of 2 hours, with renewal being mandatory within a period of no more than 18 months.

At the end of the training, all employees must take a final evaluation to receive the certificate, the minimum passing score must be 70%.

## **9. MONITORING**

Continuous monitoring activities of operations aim to ensure that LASTTRO TRADING's business is being carried out in "compliance" with established

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standards, continuously monitoring all operations and situations that may, after detection and respective analysis, constitute signs of AML/CFT.

#### **9.1 SITUATIONS DERIVED FROM CLIENT IDENTIFICATION, SUCH AS:**

- Resistance to providing information necessary to start a relationship or update registration;
- Provision of false information;
- Provision of information that is difficult or costly to verify;
- Opening, transaction of accounts or carrying out operations by a power of attorney or any other type of mandate;
- Occurrence of irregularities related to the procedures for identifying and recording operations required by current regulations;
- Registration of several accounts on the same date, or in a short period, with deposits of identical or approximate amounts, or with other elements in common, such as origin of funds, holders, attorneys-in-fact, partners, address, telephone number, etc.;
- Operations in which it is not possible to identify the final beneficiary, subject to the procedures defined in current regulations;
- Representation of different legal entities or organizations by the same counsel or legal representatives, without reasonable justification for this occurrence;
- Information on the same residential or commercial address by individuals, without demonstrating the existence of a family or commercial relationship;
- Incompatibility of reported economic activity or revenue with the pattern presented by clients with the same profile;
- Registration of the same email or internet protocol (IP) address by different legal persons or organizations, without reasonable justification for this occurrence;
- Registration of the same email or internet protocol (IP) address by natural persons, without reasonable justification for this occurrence;
- Information and documents presented by the client conflicting with available public information;
- Partners of companies without apparent financial capacity to carry out the declared business activity;

#### **9.2 SITUATIONS DERIVED FROM SITUATIONS RELATED TO NATURAL PERSONS OR LEGAL PERSONS SUSPECTED OF INVOLVEMENT IN THE FINANCING OF TERRORISM AND THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION:**

- Financial transactions involving people or entities related to terrorist activities listed by the United Nations Security Council (UNSC);
- Operations or provision of services, of any value, to people or entities that are known to have committed or intended to commit terrorist acts, or participated in them or facilitated their commission;

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- Existence of any funds owned or controlled, directly or indirectly, by people or entities that are known to have committed or attempted to commit terrorist acts, or participated in them or facilitated their commission;
- Transactions with signs of financing of terrorism and weapons of mass destruction;
- Financial transactions involving people or entities related to the proliferation of weapons of mass destruction listed by the UNCS;
- Operations or provision of services, of any value, to people or entities that are known to have committed or intended to commit proliferation of weapons of mass destruction, or participated in them or facilitated their commission;
- Existence of any funds owned or controlled, directly or indirectly, by people or entities that are known to have committed or attempted to commit proliferation of weapons of mass destruction, or participated in them or facilitated their commission;
- Transactions with signs of financing of proliferation of weapons of mass destruction;

### **9.3 SITUATIONS RELATED TO EMPLOYEES, PARTNERS, AND SERVICE PROVIDERS:**

- Unusual changes in the life and behavior patterns of the employee, partner or service provider, without apparent cause;
- Unusual modification of the operating result of the partner's legal entity, including correspondent in the country, without apparent cause;
- Any business carried out differently from the company's formal procedure by an employee, partner, correspondent in the country, or service provider;
- Providing assistance or information, paid or unpaid, to a client to the detriment of the company's program to prevent money laundering and the financing of terrorism and weapons of mass destruction, or assistance in structuring or splitting operations, circumventing regulatory or operational limits;

### **9.4 SITUATIONS RELATED TO OPERATIONS CARRIED OUT IN MUNICIPALITIES LOCATED IN RISK REGIONS:**

- Atypical operations in municipalities located in border regions;
- Atypical operations in municipalities located in other risk regions;

Monitoring must include operations and situations that seem to relate to other related operations and situations or that are part of the same group of operations.

### **9.5 PURCHASE OF SALE OF GOLD OR OTHER PRECIOUS METALS:**

Operations carried out with legal persons whose representative is a PEP, accounts opened through the attorney-in-fact, alien residents and border regions will be

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identified for a specific analysis, focusing on risk and from the perspective of preventing money laundering and financing of terrorism and weapons of mass destruction, as well as verifying the origin of resources, presumed financial capacity and the client's tradition in the market.

## **10. REPORTING, ANALYSIS, AND MONITORING OF SUSPICIOUS ACTIVITIES**

If LASTTRO TRADING suspects that the resources are products of criminal activity or relate to the financing of terrorism and weapons of mass destruction, the suspected operation or proposed operation will be promptly reported to the Brazilian Anti-money Laundering Authority (COAF-FIU) within one (1) business day following the decision of the Risk and Compliance Committee.

The period for carrying out monitoring and selection procedures for suspicious operations and situations cannot exceed forty-five days, counting from the date of occurrence of the operation or situation.

If LASTTRO TRADING suspects that the origin of the metal is different from that declared by the client, or that the volume traded is higher than that considered by LASTTRO TRADING to be feasible, the company will report it to COAF (FIU) in the same terms.

LASTTRO TRADING refrains from providing its clients or third parties with information about any communications made as a result of signs of money laundering or financing of terrorism and weapons of mass destruction.

LASTTRO TRADING, through the Risk and Compliance Committee, will deliberate on communications to COAF (FIU) in accordance with Resolution No. 23 of 12/20/2012.

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## **ORGANOGRAMA DE PLD/FTP**

### **1.1 VISÃO GERAL**

Apresentamos a representação gráfica da estrutura organizacional e das responsabilidades da LASTTRO TRADING em relação à prevenção e ao combate à lavagem de dinheiro, ao financiamento do terrorismo e ao financiamento da proliferação de armas de destruição em massa.

