

CHAPTER	ANTI-CORRUPTION
SECTION	INSTITUTIONAL POLICY

1. INTRODUCTION

This policy aims to guide the activities of managers, employees, interns and regular service providers at LASTTRO TRADING regarding anti-corruption guidelines, in addition to ensuring that they are able to assist in identifying situations of risk of non-compliance and unacceptable behavior, defined by the applicable Legislation and the LASTTRO TRADING Code of Ethics and Conduct.

In a broad sense, corruption generates uncertainty, leading to a reduction in investments and slowing growth, as well as increasing the cost of transactions. Corruption may be present in relationships either with the public or private sector.

LASTTRO TRADING repudiates any forms of corruption, whether direct or indirect, public or private, and always seeks transparency in matters that affect its business, establishing corporate governance mechanisms to avoid being involved in bribe-paying and bribe-taking.

LASTTRO TRADING does not condone any practices that may be linked to actions that favor people and characterize situations of corruption, especially including bribery, so that all its managers, employees, interns and regular service providers must ensure that situations of this nature are not practiced under any circumstances.

2. PURPOSE

This policy applies to all officers, employees, interns, and regular service providers at LASTTRO TRADING and covers donations and other payments made or received between LASTTRO TRADING and external agents. This policy does not apply to rewards, incentives, prizes, special bonuses or other recognition that may be granted by the company to employees, interns or service providers, nor does it apply to remuneration paid to LASTTRO TRADING's business partners in accordance with contractual obligations assumed.

3. GUIDELINES

LASTTRO TRADING has the principle to comply with anti-corruption laws and regulations in its business environment. Employees, interns, and regular service providers must understand that their obligation is to act ethically and responsibly in order to meet the best interests of the company.

In this context, officers, employees, interns, and regular service providers must note that the following are prohibited:

a) Bribes, payments, or offers of any item of value to any government official in any country, at any level of government, in order to corruptly influence a decision or act by that official in his or her duty, induce that official to improperly exercise or fails to perform their duties, obtain or contract business or otherwise obtain an undue advantage. The term "government representative" is interpreted broadly by law enforcement agencies, and includes employees of state-owned entities at the

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municipal, state and federal levels, or controlled by the government (including, among others, postal organizations and state-owned banks), representatives of political parties and political candidates.

b) Bribes, payments or offers of any item of value to any individual with whom LASTTRO TRADING maintains a business relationship, in order to unduly influence a decision or induce that person to improperly exercise their duties to obtain a commercial advantage.

c) Bribes, payments or offers of any item of value to any government official or legal person by third parties on behalf of LASTTRO TRADING in order to corruptly influence a government decision or to induce improper conduct to obtain a commercial advantage.

d) Facilitating payments to any person: Facilitating payments (or “key money”) are small payments made to low-level employees as a personal benefit to obtain performance of a routine, non-discretionary act to which the payer is entitled.

e) Any gifts, travels, or other entertainment offered to government representatives, without the previous approval of the Executive Board. Gifts or entertainment must be reasonable, given the circumstances of the commercial relationship, and consistent with usual commercial practice in the sector, as well as consistent with the principles of LASTTRO TRADING.

f) Receiving or giving gifts or entertainment that would cause embarrassment to LASTTRO TRADING if publicly disclosed.

g) Giving or receiving any gift that is, or appears to be, offered for the purpose of corruptly obtaining favorable business or personal treatment.

h) Solicit, accept or attempt to accept any bribe, gift or kickback from any person. A kickback is a specific form of bribery made in exchange for awarding a payment or contract to a supplier, contractor or other business.

When hiring third parties, especially those who may be dealing with domestic or foreign government authorities, officers, employees, interns and regular service providers will exercise due diligence to evaluate the experience, competence and integrity of such parties prior to hiring and should consider including anti-corruption provisions in formal contracting instruments.

Charitable donations by LASTTRO TRADING must be reviewed in advance to ensure that they are not made to obtain or contract business, advance a commercial purpose or provide personal benefit to a person associated with the recipient, especially if that person is a representative of a domestic or foreign government.

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4. REPORTING

Breaches of anti-corruption laws, especially the Federal Law No. 12.846 of 8/1/2013, are serious offenses that can result in significant criminal and/or civil penalties for LASTTRO TRADING, as well as for the people involved.

Complaints related to failing to comply with this policy must be submitted to the Executive Board.

Whenever an employee becomes aware of non-compliance with this policy, attempted bribery or any involvement in corruption, the reporting obligations apply as established in the Code of Ethics and Conduct and other relevant internal policies.

All complaints for suspicious breach of this Policy will be investigated accordingly. LASTTRO TRADING will take actions according to the circumstances and the applicable law.

5. PENALTIES

Failure to comply with this policy subjects the manager, employee, intern, and regular service provider to disciplinary and administrative actions, including the possibility of termination of the employment contract and termination of the service provider relationship, without prejudice to penal measures and penalties provided for in law.

6. FINAL REMARKS

Any doubts on the content of this policy or any situations that might involve corruption or bribery must be submitted to the Executive Board.

Failure to comply with this policy subjects the employee to disciplinary actions, including termination of the employment contract and/or administrative or penal measures, in addition to the penalties provided for by law.

7. REVISION TIME

This policy must be subject to review at least every two years, counting from the date of last review, or at any time, upon the occurrence of a relevant fact or changes to applicable legislation.