

CHAPTER	REGISTRATION
SECTION	GENERAL

1. PURPOSE

Define procedures for obtaining documentation, analysis and registration of information pertaining to clients and those involved in the operations of LASTTRO TRADING products.

2. TARGET AUDIENCE

All LASTTRO TRADING employees involved in the registration of clients and operations.

3. CONCEPT OF CLIENT REGISTRATION

Client Registration is an umbrella term that encompasses sets of data regarding or pertaining to, economic and financial information, environmental and governmental licenses, client and service provider, allowing to monitor the source of minerals, as well as creating parameters for the operations carried out daily, based on these manuals.

Registration of mining companies and suppliers of precious metals also aims to guarantee the supply chain and the sourcing of the metals acquired by LASTTRO TRADING, ensuring a transparent supply chain within the company, as well as for its end clients.

Registration is intended to provide for the detailed registration of information concerning said clients, entities, and their legal representatives.

In its regular course of business, LASTTRO TRADING does not do business with natural persons, and does only with companies (entities) that have affinity with its corporate purpose or provide services throughout the chain of their activities.

Client means any legal person, domiciled or with head office in the Country or abroad, with which LASTTRO TRADING carries out purchase and sale operations.

Active client means any legal person, domiciled or with head office in the Country or abroad, with which LASTTRO TRADING has carried out purchase and sale operations in the last 12 months.

4. FINAL BENEFICIARIES:

Final Beneficiaries is any natural person who:

- Holds, directly or indirectly, more than 50% of the capital of an entity; or Predominantly exercises resolutions and has the power to elect the majority of administrators authorized to represent the Legal Person Client as a chain of shareholding interest; or
- Represent the legal persons constituted under a public company or a non-profit entity; or
- Is a member of an Investment Fund.

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5. POLITICALLY EXPOSED PERSON (“PEP”)

Companies that maintain ties with individuals considered PEP – Politically Exposed Person (definition on pages 17 and 18 of this ICM), individuals who serve or have served, in the last five (5) years, as public servants, inside and outside the country, such as government employee, executives of government companies, positions, such as: president, governors, mayors, deputies, senators and others, or those related to PEP who are second-degree relatives or people considered to be in a close relationship, under the terms of BACEN Circular 3.978.

6. DOCUMENTATION SUPPORT

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

Following the collection of all relevant documentation, it will be submitted for analysis and verification, and, in case of discrepancies, the client must be notified so that they can arrange for adjustments.

Documentation analysis will encompass inquiries to restrictive lists as well as research on the client's reputational and criminal nature.

In order to mitigate risks, LASTTRO TRADING may request additional documents and/or information according to the case.

Without prejudice to the provisions of this section, as well as the duty to observe good practices, based on the economic basis and responsibilities defined in the respective documentation, LASTTRO TRADING may, at its sole discretion, on a case-by-case examination and with a focus at risk, dispense with certain document(s) considered not systemically relevant.

Registration forms and copies of client documents must be kept on file for a period of five years, from the date of the last transaction carried out with the client.

The Registration Department must carry out verification tests, with a maximum frequency of one (1) year to ensure the adequacy of the registration data.

Registration forms for natural persons and legal persons may be signed both physically and digitally.