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# Operating Rules and Parameters

\* Updates to this document, compared to the previous version, are highlighted in yellow

## 01. PURPOSE:

Banco BOCOM BBM and BOCOM BBM CCVM (“BOCOM BBM”), in the capacity of agents in the negotiation of securities in regulated markets, under the terms of CVM Resolution no. 35, of May 26, 2021, and in compliance with the other standards issued by the regulatory and self-regulatory bodies, establish, through this document, their operating rules and parameters.

## 02. COMPREHENSIVENESS/INVOLVED AREAS:

- Asset and Wealth Management Control;
- Wealth Management Services;
- Compliance;
- Treasury and Settlement;
- IT; and
- Internal Controls.

## 03. RESPONSIBILITIES:

### 03.01. Responsible for the performance of the assignments of this policy

It is responsibility of the involved areas the performance of the assignments of this policy.

### 03.02. Responsible for the monitoring of the performance of the assignments of this policy

It is responsibility of the Managers of the involved areas to monitor the performance of the assignments of this policy.

### 03.03. Responsible for the maintenance of this policy

The Compliance area is responsible for the maintenance and periodical update of this policy

#### 04. COMPETENCES:

The situations not forecast in this policy shall be timely assessed and taken to approval of the Executive Committee.

#### 05. GUIDELINES:

##### 05.01. Principles

BOCOM BBM will observe, in the conduct of its activities, the following principles and good practices:

- a) Probity in the conduct of its activities;
- b) Care for the integrity of the market, including regarding the selection of Clients and the requirement of deposit of guarantees;
- c) Qualification of the staff to perform their activities;
- d) Diligence in the compliance with orders and in the specification of principals;
- e) Diligence in the control of the Clients' position in custody, with the periodical conciliation between:
  - i. Executed orders;
  - ii. Positions in the statements and reports of operations provided by the entity providing the custody services; and
  - iii. Positions provided by the clearing and settlement houses;
- f) Obligation of presenting to its Clients information required to the compliance with orders;
- g) Adoption of measures in the sense of avoiding the performance of operations in situation of conflict of interest and assuring equal treatment to its Clients;
- h) Provide its Clients, on a timely basis, with the documentation or information related to the business carried out;
- i) Continuously monitor intermediated operations, identifying those that aim to provide undue advantage or profit, or to cause damage to third parties;
- j) Report to the regulator the occurrence or suspicious activities that may indicate violation of the legislation within the stipulated deadlines; and
- k) Implement information security policies and plans for business continuity.

## **05.02. Registry of clients**

### **05.02.1. Registry Data**

The Client, before starting his/her operations in the organized markets of securities, shall:

- i. Provide all register information requested, upon the filling out and signature of the register document and signature of the service provision contract, as well as deliver copies of the pertaining evidencing documents; and
- ii. Formally adhere to the rules set forth in the standards edited by the depositary centers where their applications are registered.
- iii. Formally adhere to the rules set forth by the issuers of bonds and securities the client may acquire.

The remuneration paid by the Client will be negotiated upon the contracting of the services.

BOCOM BBM will keep updated all documents related to the register of Clients, to the Orders, and to the Operations carried out for the term and under the terms set forth in the applicable legislation and regulation.

The Client shall also update his/her register data, having to inform BOCOM BBM about any changes that may occur in his/her register data within 10 (ten) calendar days, from the said change.

### **05.02.2. Identification of the Clients**

In the process of identification of the Client, BOCOM BBM will adopt the following procedures:

- Identification of the Client and keeping of the updated registers at the extent required by the regulation in effect, especially Resolution CVM no. 50, of August 31, 2021, and subsequent changes, and in the rules edited by the involved depositary centers;
- In the case of simplified register of Non-Resident Investor, it will meet the requirements provided in the rules edited by CVM, especially Resolution CVM no. 35, of May 26, 2021, and subsequent changes, and in the rules edited by the involved depositary centers.
- Update of the register data of the active Clients at intervals not over: 5 (five) years for clients classified as lower risk, and 2 (two) years for customers classified as higher risk;

- Continuous adoption of rules, procedures, and internal controls aiming at the confirmation of the register information, the keeping of the updated registers, and the identification of the final beneficiaries of the operations, according to legislation applicable to the product and to the actuation market, in order to avoid, through its agent, the undue use of the communication means and execution of orders by third parties, or even, for money laundering, funding to terrorism and/or fraud;
- Disclosure of the legislation applicable to the product and to the actuation market to its Clients;
- Identification of the politically exposed people (PPE) and adoption of stricter supervision procedures of the relationships and operations involving such people, with special attention to the proposals of start of relationship, and the maintenance of rules, procedures, and internal controls to identify Clients that became such people after the start of the relationship with BOCOM BBM, always in compliance with the legislation applicable to the product and to the actuation market; and
- Maintenance of the information kept in the register of the Clients, with the respective documents, including those that are not of mandatory inclusion, for eventual presentation of the Regulatory Bodies or the Judiciary Branch.

### 05.02.3. Know Your Client

In the “Know your Client” (KYC) process, BOCOM BBM will take the necessary measures to:

- Carry out due diligences throughout the entire business relationship with the client, in order to: (i) reinforce the verification of the veracity of the information collected in the identification process described above (ii) collect supplementary information, where appropriate, as well as (iii) keep it up to date, in the event of the detection of a new fact that justifies bringing forward the deadline established by the institution for updating the registration and (iv) verify public and private sources about factors that qualify the client's history of conduct and relationships in order to classify it according to a risk-based approach methodology.
- In the conducting of those diligences, show that efforts were made to find additional information in order to properly classify and manage this client's LDFT risks.
- Show that the decision-making process was carried out in accordance with the limits in force for starting new relationships and maintaining existing ones.

### **05.03. Orders**

#### **05.03.1. Rules Regarding the Receipt of Orders**

For effect of this document, it is understood as “Order” the act through which the Client determines the performance of an operation or record of operation, in their name and in the conditions they specify, observing the transmission form indicated in the register document. The BOCOM BBM adopts procedures based on the principles of confidentiality, authenticity, integrity and availability of information to archive the data and voice records relevant to the transmitted orders.

#### **05.03.2. Types of Accepted Orders and Validity Term of Execution**

BOCOM BBM will accept, for execution in the organized markets, the following types of Order:

- a) Limited Order: it is the one that shall be performed only at equal price, or better, to that specified by the Client;
- b) Order to Market: it is the one through which the Client only specifies the quantity and the characteristics of the bonds, securities, assets, or rights to be evidenced or sold, having to be executed from the time it is received;
- c) Stop Order: it is the one that specifies the price of the bond, security, asset, or right from which the Order shall be performed;
- d) Start Order: the one where two prices are recorded, trigger price (threshold where the Order will be sent) and limit price (maximum value to be paid for the asset or right), scheduled to be issued only when the price of the asset or right to be bought reaches value equal to or over the trigger price; and
- e) Discretionary Order: it is that issued by administrator of portfolio of bonds and securities or by who represents more than one Client, being the issuer of the Order liable to establish the conditions the same shall be executed and, after its execution, the issuer of the Order will appoint the names of the principals to be specified, the quantity of assets or rights to be assigned to each of them, and the respective price.

The validity term of the Orders will be determined by the Client upon their issuance/transmission. Once such term is ended, the Orders not complied with will be automatically canceled, and the renewal thereof may only occur by initiative of the Client, who shall re-sent them and obtain the prior and express agreement of BOCOM BBM.

### 05.03.3. Time to Receive the Orders

The orders will be received during the regular working hours of the markets, considering the specificities defined by each marketing administrating entity.

By reason of the risks inherent to the communication systems, BOCOM BBM may not be responsible for any problems of transmission of orders through electronic media, including, but not limited to, failures of the network caused by Acts of God, force majeure, problems of compatibility or defects in products or services provided by third parties, problems related to the technology deployed that were not foreseeable, slowness of the system, difference of times between the transmission and reception of Orders, which delays or prevents the reference to negotiation session, according to validity term set forth by the Client.

### 05.03.4. Forms of Transmission of Orders

Only Orders transmitted to BOCOM BBM orally or in writing will be executed, according to the Client's option amongst the authorized channels informed in their registry documents. As required by CVM Resolution 35, it is important to warn that **order transmission through digital means is subject to interruptions or delays, which may prevent or hinder the sending of orders or the receipt of updated information.**

In the event that a connectivity session is used to transmit Orders through electronic media, the system's password is for the exclusive, personal and non-transferable use of the Client and the operations carried out through this system using the access password will be considered for all the effects as having been carried out by the Client. If there is suspicion of irregular use of the Client's password, BOCOM BBM will inform B3 and BSM and, if deemed necessary, block the use of that password until the reason for its irregular use is identified and corrected.

If the Client contacts us via unauthorized means, formalization via e-mail or recorded call is mandatory.

### 05.03.5. Receipt/Refusal Procedures of Orders

As a rule, BOCOM BBM will not make restrictions to the receipt/execution of Orders that are according to the operational parameters set forth in the standards of the settlement centers and issuers of the bonds and securities. However, it will observe the following:



- BOCOM BBM will establish mechanisms that aim at limiting risks to its Client(s), as a result of the variation of prices and exceptional market conditions, being able to fully or partially refuse to perform the information requested, upon the immediate communication, in writing, to the Client(s).
- BOCOM BBM may also refuse to receive any Order, at its sole discretion, whenever it checks the practice of illegal acts or the existence of irregularities, notably towards the creation of artificial conditions of prices, offers or demands in the market, the manipulation of prices, fraudulent operations, money laundering, use of non-equitable practices and/or financial incapacity of the Client.
- BOCOM BBM will not accept orders that removes the classification of the client's profile, mapped through a Suitability questionnaire, and the same does not update his/her register, adapting his/her risk profile to the application he/she is acquiring or does not sign an awareness document of the removal of classification of his/her portfolio in relation to his/her profile.

#### **05.03.6. People Authorized to Issue/Transmit Orders**

BOCOM BBM may only receive Orders transmitted by the Client or by third parties, provided that duly authorized and identified. In case of attorney, the Client will be liable to present the respective proxy to BOCOM BBM, which will be filed with the register sheet/service provision contract, also being the Client liable to inform BOCOM BBM on the eventual revocation of the proxy.

#### **05.03.7. Entry of the Orders**

BOCOM BBM will register the Orders received in computerized systems and will present the following information:

- Identification code or name of the Client with BOCOM BBM;
- Date, time and sequential number that identifies the chronological serialization of the record of the Order;
- Order expiration date;
- Description of the asset subject matter of the Order (negotiation code, quantity and price);
- Indication of vinculated persons operation or proprietary trading;
- Nature of the operation (purchase or sale; market type; transfer or PL operations);
- Type of Order;
- Identification of the issuer, operator and order status.

#### **05.03.8. Cancellation of Orders**

All and any Order, while not executed, may be canceled:

a) by initiative of the Client him/herself or by third party authorized to transmit Orders in his/her name;

b) by initiative of BOCOM BBM if:

- the operation, the circumstances, and the data available in BOCOM BBM point out risk of default of the Client;
- it contradicts the legal or regulatory standards of the organized markets;
- lack of resources made available by the originator;
- by unexpected loss of assets that ground the operation;
- the Order has validity term to the issuance day itself and is not fully or partially executed.

c) by initiative of parties

- by unexpected loss of assets that ground the operation

The Order, while not executed yet, will be canceled when the Client changes any of his/her conditions, being issued, if it is the case, a new Order.

The cancellations provided in this item shall be expressly identified in the control that formalizes the record of Orders. The canceled Order will be kept in a sequential file, together with the other issued and executed Orders.

#### **05.03.9. Execution of the Orders**

Execution of Order is the act through which BOCOM BBM complies with the Order transmitted by the Client upon the performance or record of operation in the markets administered by depositary centers.

For purposes of execution, the Orders in the administered markets of bonds and securities may be grouped by BOCOM BBM per type of asset subject matter, settlement date, and price.

The confirmation of the execution of the Order will also occur upon the issuance of confirmation document of the operations, including with the information of the operations performed to comply with the Order, which will be sent to the Client.

#### **05.03.10. Distribution of the Operations**

Distribution is the act through which BOCOM BBM will assign to its Clients, wholly or partially, if it is the case, the operations carried out or registered thereby.

BOCOM BBM will guide the distribution of the operations, observing the following criteria:

- a) only the Orders that are liable to execution upon the processing of an operation will compete in its distribution;
- b) the Orders of people not bound to BOCOM BBM will have priority in relation to the Orders of people bound thereto;
- c) observing the criteria aforementioned, the chronological numbering of receipt of the Order will determine the priority for the fulfillment of and issued order.

#### **05.04. Position of securities**

The securities property of the Client will be registered in an individual position. The financial transactions resulting of operations that have securities as subject matter, or events related to such securities, will be credited or debited in checking account of the Client, kept with Financial Institution indicated in his/her register documentation.

BOCOM BBM will make available to its Clients information related to the position of custody and transaction of assets.

BOCOM BBM shall keep control of the Clients' positions, with the periodical conciliation between:

- Executed orders;
- Positions on the database that generate statements and reports of transactions provided to its Clients; and
- Positions provided by the clearing and settlement entities, if it is the case.

#### **05.05. Custody Transfers**

The client may request the custody transfer of his fixed income or variable income assets, government bonds and investment fund shares from one brokerage house to another, or asset transfers from a custodian bank to a brokerage house.

For all items, the request forms are available on the BOCOM BBM website, as well as their respective manuals (in order to assist in filling them out and provide guidance), as follows:

- STVM - Securities Transfer Request, OTA - Stock Transfer Order, Public Security Custody Transfer Form and Manual for Completing Custody Transfer
- Investment Fund Quota Transfer Letter and Manual for Completing the Investment Fund Quota Transfer Letter

In case of questions or other requests, the client may contact the responsible investment advisor or by e-mail [transfativos@bocombbm.com.br](mailto:transfativos@bocombbm.com.br).

#### **05.06. Rules regarding the settlement of the operations**

BOCOM BBM will keep, in name of the Client, a checking account intended to the debts and credits carried out in his/her name.

The payment of values made by the Client to BOCOM BBM as a result of operations carried out on his/her account and order, as well as the expenses related to the operations, shall be made with own resources through bank transfer or check of the Client's title.

The payment of values made by BOCOM BBM to the Client shall be made through bank transfer.

The financial resources sent by the Client to BOCOM BBM will only be considered available after the confirmation, by BOCOM BBM, of their effective receipt.

The settlement times for transactions will be as follows:

	OTC Market		Bovespa		National Treasury		TPF SELIC	
	Buy	Sell	Buy	Sell	Buy	Sell	Buy	Sell
Time	Between 10h and 19h, D+0 from the operation	Between 10h and 19h, D+0 from the operation	11h, D+2 from the operation	15h, D+2 from the operation	11h, D+1 from the operation	16h, D+1, for operations after 13h 16h, D+0, for operations before 13h	18h, D+0 from the operation	18h, D+0 from the operation

If there are pending debts in name of the Client as a result of the operations carried out on his/her account and order, as well as expenses related to the operations, BOCOM BBM is authorized to settle the contracts, rights, and assets acquired on the Client's account and order, as well as execute assets and rights given in guarantee of his/her operations or that are in his/her power, applying the sale product in the payment of pending debts, regardless judicial or extrajudicial notification. Without prejudice to any provision of this document, the guarantees deposited by the Client may be executed (i) by BOCOM BBM, if it does not receive from the Client the resources for settlement of the operations carried out by the Client, (ii) by B3, if it does not receive from the BOCOM BBM the values for settlement of operations carried out by the Client.

In the event that we need to reverse transactions posted to an error account or operational error account, any transactions that fall into the error account will be reallocated until the end of the day to ensure that the transactions are cleared. Since we operate on account and order, the operational error account is not used.

The transfers made by BOCOM BBM to the non-resident investing Client may be made to the checking account of the Custody administrator of non-resident investor or of the Custody administrator of third parties contracted by the non-resident investor, which shall also be identified in the register of the Client with BOCOM BBM.

BOCOM BBM does not offer Client Facilitation and Retail Liquidity Provider (RLP) services. These services are intended to provide liquidity for trading. "Client Facilitation" refers to the activities of an institution, with defined criteria for acceptance, in the acquisition and/or sale of securities from

clients, and “Retail Liquidity Provider” refers to the activities of an institution as a counterparty in purchase and sale orders for securities from retail clients, bringing greater liquidity to trading on the markets operated by B3.

#### 05.06.1. Procedures in the event of failure in the delivery of assets

In case of failure to deliver assets for any reason, the Control and Settlement departments will notify the Wealth Management Services sections, which will be responsible for communicating with the Investment Advisors and the latter with their respective clients. This communication should only be carried out through authorized communication channels, such as e-mail and recorded extensions, and should cover at least:

- i. Daily and, if necessary, immediate notification to the client of the occurrence of an asset delivery failure and the status of the failure treatment procedure until its completion;
- ii. Provision of service channels capable of adequately informing customers of the phases of the asset delivery failure treatment procedure until its conclusion; and
- iii. Notification of the need or possibility of action by the customer, establishing deadlines for said action.

The notifications mentioned must contain, as applicable:

- (i) The procedure for attempting to deal with the failure, by means of compulsory lending and repurchase of the asset;
- (ii) The time at which the repurchase process may begin;
- (iii) Information on the possibility of regularizing the settlement before opening the repurchase process;
- (iv) Informing the buyer of the consequences of opening a larger position than desired if the client buys back assets that are in the process of being treated for failure;
- (v) Questioning the creditor client's interest in receiving the asset after the failure, setting a deadline for a response;
- (vi) Indicating the client's creditor and/or debtor position;
- (vii) Amounts that will be credited and/or debited and/or reversed, indicating when the entries will be made and whether the client should keep an amount available in the account to avoid margin calls, fines for balance due and/or compulsory liquidation;
- (viii) Impact on the margin amount, so that the debtor client knows that its failure position will be taken into account in the risk calculation for the purposes of updating the required margin, in accordance with the criteria established in the Clearing House Operating Procedures Manual;
- (ix) Implementation of the delivery of the asset and receipt of the asset in

custody at the end of the failure treatment process; and (x) Submission of the calculation memory of the amounts credited and debited as a result of the delivery failure procedure, including fines.

All notifications sent and records of the service provided must be filed in a shared directory and kept for at least 5 years.

#### **05.07. Risk control**

BOCOM BBM has the continuous concern to be in compliance with the applicable standards and reduce the risks incurred upon the nature of its business.

Thus, BOCOM BBM has policies and procedures related to the management of the market, liquidity, and operational risks.

In relation to the intraday risk management, involving the control of the open positions of the clients and of the deposited guarantees, BOCOM BBM only acts as agent of the clients in the spot market, with the resources required to the performance of the operation deposited with the bank, not granting operational and exposure limits.

##### **05.07.1. Management and Limit Monitoring (post-trading)**

In the current model, BOCOM BBM sets forth a null operational limit to its clients. BOCOM BBM acts with individuals of the high income segment and only operates in the spot markets of B3, products that do not generate leverage to the clients and, thus, do not demand additional resources (that is, margin or adjustments), with impact to BOCOM BBM. Under the terms of the operational contracts entered into between BOCOM BBM and its clients, according to models provided to BSM, the clients' orders are only settled upon existence of resources available with the institution, to honor acquisition of such assets in cash.

Although it is competence of the Risk Area of the prudential group to establish limits to the clients, since the same are null, it is the competence of the Operational Control to assure the compliance with what was established (area in charge of the policies and internal manuals of settlement of the operations in Exchange Market).

### 05.07.2. Management and Limit Monitoring (pre-trading)

Not applicable since BOCOM BBM does not make available a tool of direct access to the market (DMA) to its clients.

### 05.08. Linked parties and proprietary transactions

BOCOM BBM allows linked parties to make investments in bonds and securities, as long as in compliance with the Personal Investments Policy, which establishes the procedures to be followed for asset trading. Additionally, BOCOM BBM will observe the following conditions, regarding transactions involving linked parties:

- In case of concurrent orders simultaneously given by Clients that are not linked parties and by linked parties, Clients' Orders that are not linked parties shall take priority.
- BOCOM BBM is forbidden to privilege its own interests or interests of linked parties thereby in detriment of the Clients' interests.
- The linked parties to BOCOM BBM may only negotiate securities on their own account, directly or indirectly, through BOCOM BBM, not applying, however:

I. To the financial institutions and to the entities equivalent thereto; and

II. To linked parties, in relation to the operations in organized market where BOCOM BBM is not a person authorized to operate.

III. To negotiations mediated by an institution contractually obliged to provide information to BOCOM BBM about transactions carried out by linked parties, and which have the express authorization of the persons bound for such provision of information.

- The linked parties with link to more than one broker shall choose only one broker with whom they keep a link to negotiate, with exclusivity, securities in their name.

Transactions carried out for own portfolio are equivalent to those of linked parties.

The following are considered linked parties, for the purposes of such document:

- a) Administrators, employees, operators, and other agents of BOCOM BBM that perform brokerage or operational support activities;



- b) Autonomous agents that provide services to BOCOM BBM;
- c) Other professionals that keep, with BOCOM BBM, a service provision contract directly related to the brokerage or operational support activity;
- d) Individuals that are, directly or indirectly, controllers or participate in the shareholding control of BOCOM BBM;
- e) Controlled companies, directly or indirectly, by BOCOM BB or by persons bound thereby;
- f) Spouse or companion and children underage of the people mentioned in the previous items “a” to “d”; and
- g) Clubs and investment funds which majority of the shares belongs to linked parties, unless if discretionarily managed by third parties not bound.

#### **05.09. Monitoring of the investments in relation to the principals**

In the process of register of the Client, the assessment and the identification of his/her financial profile are performed, of his/her experience in matter of investments and the purposes aimed. Thus, the Client will provide information for assessment of:

- a) Risk tolerance;
- b) Awareness of specific products and previous experience in investing in the financial market;
- c) Purposes of the investment; and
- d) Client's economical-financial situation.

Three profiles of category of Clients were defined, which took into account objective and subjective criteria, with the purpose of classifying them regarding their susceptibility to risk, taking into account their financial situation, experience in relation to investments, the purposes aimed, their tolerance to risk, and the time frame of the investment.

Through the combined analysis of such variables, BOCOM BBM defined the classification of the profiles, as below:

Conservative: declares to have low risk tolerance and prioritizes investments in Investment Products with liquidity.

Moderate: declares average risk tolerance and seeks the preservation of its capital in the long term, willing to allocate a portion of its resources to higher risk investments.

Aggressive: declares high risk tolerance and accepts potential losses in order to obtain of higher returns.

#### **05.10. About the information recording and recovery system**

BOCOM BBM carries out recording, in an intelligible manner, of all oral Orders received by telephone or similar device.

The recording system kept by BOCOM BBM shall enable the reproduction, with clarity, of the dialog kept with its Client, also containing all information required to the full identification of the Order, the Client that has issued it, including with start date and time of each recording. The contents of such records may be used as proof in the clarification of questions related to the Client's account and his/her respective operations, also having to be kept by BOCOM BBM for the term of 5 (five) years from the date of the respective recording.

The respective recording system works on a daily basis, since the start until the closing of the operation of the organized markets of bonds and securities, and keeps control of the lines and branches.

#### **05.11. Money laundering prevention and fighting**

BOCOM BBM informs that it has internal controls of prevention and fighting to money laundering and to the funding to terrorism over its operations and the operations of its Clients, at least including the implementation of the following controls:

- Recording and Monitoring of Operations involving securities, regardless their value – the monitoring of the operations established based on own criteria, for verification of the compatibility with the equity and financial situation of the Client, informed in his/her register, analysis of the operations together with other related operations and that make be part of a same group of operations or keep any type of relationship among themselves, for effect of identification of

operations that may configure crime of money laundering and funding to terrorism, establishing special rules of monitoring to the categories of investing Clients classified as high risk and maintenance of rules, procedures, and internal controls to identify the origin of the resources involved in the transactions of the Clients and of the beneficiaries identified as politically exposed people, according to legislation applicable to the product and to the actuation market, in order to avoid the undue use of the systems of execution of orders by third parties for the practice of illegal acts.

- Preservation of the registers of the Clients and of the records of the operations performed thereby, keeping them at disposal of CVM, as well as preservation of the documentation that evidences the adoption of procedures of monitoring of the operations and verification of compatibility between the economical-financial capacity of the Client with the operations performed thereby, and also of the records of the conclusions of their analysis about the operations or proposals, for the minimum term of 5 (five) years, counted from the closing date of the Client's account with BOCOM BBM or of the completion of the last transaction carried out in name of the respective Client (whichever occurs later), being such term able to be indefinitely extended in the event of existence of investigation formally informed by CVM to BOCOM BBM.
- Communication, to the competent authorities, after analysis and resolution of the Compliance Committee, of suspicious operations according to determination and orientation of term and form of the applicable legislation;
- Development and implementation of procedures of internal controls that assure the observance of the obligations related to the register, monitoring, preventive identification of the risks of practice of the money laundering crimes including analysis of new technologies, services, and products, identification of Clients that became after the start of the relationship with BOCOM BBM or that was checked that they were politically exposed people at the start of the relationship, identification of the origin of the resources involved in the transactions of the Clients and of the beneficiaries identified as politically exposed people, selection of reputable employees and of high ethical standards to its staff, and the communication of suspicious operations to the authorities, according to legislation applied to the product and to the actuation market, aiming at the prevention to the crimes of money laundering and funding to terrorism.
- Maintenance of continuous training program for employees, intended to disclose the procedures of internal controls of prevention to money laundering and funding to terrorism.

#### 05.12. Information safety and continuity of business

BOBOM BBM informs that it has internal controls sufficient to the proper safety of the information and continuity of the operations, including the following controls:

- Control of logic access to the information and support systems, in order to prevent the non-authorized access, theft, undue change, or information leakage;
- Formal mechanisms to manage accesses and passwords (networks, systems, and databases, including the channel of electronic relationship with Clients);
- Implementation of solution of technology safety for control of the external access to the internal environment (firewall), which protects the information against malicious codes (antivirus);
- Periodical tests of the information systems regarding their safety, and timely correction of identified vulnerabilities;
- Measures that keep the information with the same protection level at all times of its use in relation to the external activities, including remote work;
- Audit trails to the critical systems, which allow to identify origin, date, time, user in charge, and definition of all maintenances carried out over critical information;
- Preventive measures against the unscheduled interruption or unavailability of the information systems, identifying processes and people that may negatively affect the most critical processes and establishing proper alternative and compensatory controls;
- Periodical tests of the preventive measures defined and implemented, in order to guarantee the efficiency and efficacy thereof;
- Record of the situations of unavailability of the systems, networks, communication channels (including voice recording);
- Maintenance of backup copies in an environment other than that intended for archiving data relevant to the transmission of orders;
- Record and follow-up of all interruptions or failures that generate unscheduled interruption of the systems since their occurrence; and
- Application of outline solutions and implementation of final solution, for effect of the proper management of incidents and problems.

#### 05.13. Occurrence of a Special Situation in relation to the Participant

BOCOM BBM informs that in the event of the occurrence of any Special Situation, as defined in the B3 Glossary, it is fully authorized and without the need for prior or specific additional

authorization from the Client, to carry out the transfer of positions and guarantees owned by the Client, in the form of B3 regulations, for the target participant defined by B3 or by the Client and to share data and/or information maintained by B3's clearing and/or variable income central depository with the target participant, in compliance with B3 regulations.

#### **05.14. Form of communication to the Clients of the changes in the Operating Rules and Parameters**

The terms of this document may be unilaterally changed by BOCOM BBM at any time, being certain that the Client will always be bound by operating rules and parameters that are in effect.

The new versions may be disclosed by mail, e-mail, observation in the Brokerage note or through the site of BOCOM BBM, with use of different formats of communication, such as banners and notices in general. Previous versions may be requested at any given moment via Investment Assessor or via the e-mail [wms@bocombbm.com.br](mailto:wms@bocombbm.com.br).

Additionally, BOCOM BBM keeps at its site a digital version of the document always updated. The physical version of the document may be directly obtained at the head office of BOCOM BBM.

#### **05.15. Customer Service and Ombudsperson**

BOCOM BBM keeps a Customer Service ("SAC") through the phone number 0800 725 2228 (work days, from 08h to 17h) and via the e-mail [sac@bocombbm.com.br](mailto:sac@bocombbm.com.br) (any day, 24h a day), with the purpose of improving our products and services.

Additionally, the Ombudsman's Office of BOCOM BBM was created with the purpose of receiving, analyzing, and giving feedback to the requests, complaints, questions, and suggestions of clients. Through the several communication channels described as follows, we look for meeting in a clear, ethical, organized, and efficient manner the questions of clients.

PHONE: 0800 724 8448

MAIL: Av. Barão de Tefé, 34 – 20º andar – CEP:20220-460 – Rio de Janeiro – RJ A/C: Ombudsman

E-MAIL: [ouvidoria@bocombbm.com.br](mailto:ouvidoria@bocombbm.com.br)

## 06. RELATED LEGISLATION/REGULATION:

- Resolution CVM no. 35 and subsequent changes;
- Basic Guide of the Operational Qualification Program of B3;
- Official Circular Letter 131/2022 PRE (BM&FBOVESPA 053/2012-DP);
- Official Circular Letter B3 130/2022-PRE; and
- Manual of Standards of Broker of Securities CETIP.

## 07. INTERNAL REFERENCE:

- Policy of Prevention to the Money Laundering and Funding of Terrorism;
- Policy of Information Safety and Cybersecurity;
- Policy of Operational Continuity Management;
- Policy of Registry of Clients;
- Policy of Personal Investments; and
- Policy of Telephone Recording.

## 08. VERSION CONTROL:

This document comes into force on 01/08/2025.

Version	Operation	History	Authors
1.	01/28/2013	Preparation of Operating Rules and Parameters	Compliance
2.	02/14/2017	Review	Private Banking
3.	05/11/2018	Review	Compliance
4.	08/31/2020	Review	Compliance
5.	12/04/2020	Review	Compliance/Corporate Legal
6.	11/10/2023	Review	Compliance
7.	25/09/2024	Review	Compliance
8.	22/07/2025	Review	Compliance

## 09. APPROVALS:

Giuliana Marconi – Compliance Manager

Luiz Augusto Guimarães – Compliance Officer

## 10. ANNEXES:

In relation to non-resident Clients in Brazil, as defined by the Federal Revenue of Brazil, the Securities Brokerage Agreement entered by the Client and BOCOM BBM will be effective as of the present date with the following statements:

“The CLIENT, which is a non-resident in Brazil, as defined by the Federal Revenue of Brazil (“ Non-Resident ”), and deposits guarantees with B3, declares before the BROKER that : (a) it is aware and complies with the eligibility criteria established in the B3 Clearinghouse's Risk Management Manual regarding the deposit of guarantees abroad; (b) it is aware of and complies with the B3 Non-Resident Investor Module (c) it meets the eligibility criteria set out in the B3 Clearinghouse Regulation and in the B3 Clearinghouse Risk Management Manual; (d) falls into one of the categories of investors with permission to deposit guarantees abroad and resides in an authorized jurisdiction, as defined in the B3 Clearinghouse Regulations and in the B3 Clearinghouse Risk Management Manual;

The Non-Resident CLIENT undertakes to notify the BROKER regarding (i) the occurrence of any event or change in circumstances that may adversely affect its ability to meet the eligibility criteria for the deposit of guarantee abroad defined in the applicable B3 regulations; and (ii) cessation of compliance with the eligibility criteria, in any case, on the date on which the relevant event occurs or on the date reasonably expected to occur;

The Non-Resident CLIENT expressly acknowledges and declares to know and comply with its obligations under the B3 Clearinghouse Regulation, the B3 Clearinghouse Risk Management Manual and the B3 Non-Resident Investor Module”.