

# AUSTRAL



H O L D I N G

Short Guide – Anti Money Laundering

- 01 The responsibility for adopting conduct to preventing money laundering lies with all employees, customers and partners of the Company, as well as compliance with the procedures, guidelines and controls described and established by the Company;
- 02 All customers, suppliers, third parties, service providers and employees are submitted to the internal risk assessment, in order to be categorized and adopt more assertive control over the parties that represents higher risk of money laundering;
- 03 The Company has established the following risk categories: prohibitive; high risk; and low risk, whose classification depends on the positive or negative response of the risk factors determined in the documentation related to this topic. These factors refer to the main features of a suspicious party used in national and international framework, such as: (i) classification as a politically exposed person; (ii) FATF sanctions listc; (iii) association with negative media, among others;
- 04 At the time of the first evaluation, the employee responsible for the relationship must be aware of the prohibitive risk factors established by the Company, which are: countries with business restrictions by FATF; and parties sanctioned by money laundering and terrorist financing by international organizations;
- 05 All parties diligences are duly registered, both approved and rejected, so that the Company has the appropriate knowledge of all cases, in a private information system, and can monitor what it deems pertinent;
- 06 When it is not possible to obtain the data for identification and qualification of the High-Risk parties through the available tools, the person responsible for the relationship must request directly from the party the missing information considered minimum, following the deadlines established by the Company;
- 07 For the approval of parties categorized as High Risk, the authorization of the Chief Risk Officer must be obtained, prior to the beginning of the business relationship or for the renewal of existing relationships;
- 08 It is essential that the due diligence of the parties have been updated for less than 6 months at the time of any payment - claims or premium refund -or in contractual renewals, following the specific steps and feature of the Company's processes, described in a policy dedicated to the subject;
- 09 The departments are instructed to communicate, in a timely manner, to the Governance, Risk and Compliance department whenever there is identification of any atypical operation in order to carry out the due analysis;

10 All employees must observe the performance indicators related of suspicious operations, listed in the specific documentation regarding this matter, in order to identify them and communicate them to COAF (*Conselho de Controle de Atividades Financeiras*), when needed, as well as ensure solid and transparent transactions;

11 The departments that have more visibility and knowledge are responsible for observing the two cases in which the Company must communicate to COAF automatically, and no analysis or judgment is required: (i) transactions carried out in cash above R\$10,000; and payments made in accounts abroad above R\$100,000; and

12 In addition to the terms listed above, the underwriting risks, operations with assets, private negotiations and hiring of third parties must be lied on ethics, complying with internal manuals and policies and the current legislation, all disclosed to the Company's employees and third parties.