

1. PURPOSE

1.1 Preventing CAIXA from being used for money laundering, terrorism financing and financing of the proliferation of mass destruction weapons, in order to mitigate image, legal and reputational risks.

2. LEGAL MOTIVATION

2.1 Compliance with Federal Law nr. 9.613/1998 (Mar 3rd, 1998), BCB¹ Circular nr. 3.978/2020 (Feb 23rd, 2020), CVM² Resolution nr. 50/2021 (Aug 31st, 2021), regarding the establishment and implementation of the Policy for Anti-Money Laundering, Counter-Terrorist Financing, and Countering the Financing of the Proliferation of Weapons of Mass Destruction.

2.2 Accordance with the strategic objectives outlined in CAIXA Institutional Strategic Plan.

3. TERM AND TERMINATION

3.1 This Policy remains in force for five (5) years from its publication date and its content may be updated in case of CAIXA management board identifies any need for improvements, always taking into account the regulatory environment, macroeconomic context, strategic requirements and/or specific requests from the board responsible for approving the matter, as well as any determination made by regulatory and inspection bodies.

4. GUIDELINES

4.1 AML/CTF Strategy

4.1.1 CAIXA adopts the Risk-Based Approach (RBA) to enable reinforced management and mitigation controls for higher risk situations and basic procedures for lower risk situations.

4.1.1.1 The enforcement of Risk-Based Approach is based on CAIXA Internal Risk Assessment, which considers the risk profile of customers, company, operations, transactions, products, and services, covering all distribution channels and the adoption of new technologies, in addition to the activities carried out by employees, partners and outsourced service providers.

4.1.1.1.1 The Internal Risk Assessment covers a methodology for measuring the probability of occurrence, as well as the scale of financial, legal, and reputational impacts for the company.

¹ Central Bank of Brazil (Banco Central do Brasil) – Brazilian banking regulator: <https://www.bcb.gov.br/>

² Federal Securities Commission (Comissão de Valores Mobiliários): <https://www.gov.br/cvm/pt-br>

4.1.1.1.2 The Internal Risk Assessment considers the largest possible number of variables, and is ought to be reviewed every two years, or whenever any eventual improvement is identified.

4.1.2 The procedures for assessment and prior analysis of new products, as well as the use of new technologies, consider the potential risks and weaknesses from an AML/CTF perspective and provide for adoption of mitigating measures compatible with mapped risks.

4.1.3 CAIXA promotes the AML/CTF acculturation program for employees, partners, and outsourced service providers, which is developed and applied according to the target audience.

4.1.4 CAIXA promotes and develops AML/CTF training programs according to the target public, which includes CAIXA employees, as well as Lottery Units and CAIXA Banking Correspondents (CAIXA Aqui).

4.1.5 CAIXA adopts procedures for recording transactions, operations, and financial services, in accordance with external regulatory requirements, which include the identification of the origin and destination of funds to enable the monitoring of AML/CTF.

4.1.6 The monitoring and screening of suspicious operations are made through predictive models, based upon artificial intelligence and/or statistical techniques, aiming at accuracy and strict compliance with legal deadlines.

4.1.7 Procedures for assessment and report of suspicious transactions, as well as operations and proposals are guided by, but not limited to, current legislation, in order to provide assertive reporting to Brazilian Financial Intelligence Unit (Coaf³) and strict compliance with legal deadlines.

4.1.8 CAIXA ensures the quality of information provided through reports of suspicious activities, assuring its authenticity before sending it to the regulatory body (Coaf).

4.1.9 Information on the parameters and other data used for monitoring, selecting, assessing, and reporting suspicious ML/FT operations and proposals to Coaf is confidential and only shared in accordance with internal regulations.

4.1.10 CAIXA conducts AML/CTF monitoring, screening, assessing, and reporting of suspicious operations, proposals and situations in a confidential manner, with the aim of identifying and paying special attention to suspicions of ML/FT, without disclosing the parts involved, such as partners, outsourced service providers, clients, users, or areas that do not work directly with AML/CTF management, unless expressly required by internal regulations.

4.1.11 CAIXA protects the identity of whistleblowers of suspicious money laundering and terrorism financing operations, proposals, and situations, as well as the identity of employees/managers who carry out AML/CTF procedures.

³ Council of Financial Activities Control (Conselho de Controle de Atividades Financeiras – Coaf): <https://www.gov.br/coaf/pt-br>

4.1.12 CAIXA does not conduct business with Shell Banks.

4.1.13 CAIXA does not allow transfers of funds through anonymous current accounts or accounts linked to fictitious holder(s).

4.1.14 CAIXA complies with the measures imposed by United Nations Security Council (UNSC) sanctions or by the designation of its committees, which determine the unavailability of assets of natural and legal persons or entities.

4.1.15 CAIXA does not conduct business with persons listed on international restrictive ML/FT lists.

4.1.15.1 CAIXA monitors international sanction lists, including those of natural and legal persons and entities with a record of sanctions imposed by the UNSC, as well as other lists defined in internal rules.

4.1.16 CAIXA yearly conducts an Effectiveness Assessment in accordance with mandatory legal requirements, to verify its compliance with AML/CTF policy, procedures, and internal controls.

4.1.16.1 Any deficiencies identified in the Effectiveness Assessment are addressed through action plans, which are monitored by Senior Management.

4.1.17 CAIXA AML/CTF Policy may be extended to companies in the CAIXA Conglomerate, upon formal accession.

4.1.18 Responsible unit: Internal Controls and Integrity Executive Board.

4.2 AML/CTF in Customer Relationship

4.2.1 CAIXA adopts Know Your Customer (KYC) procedures since onboarding and throughout the customer life cycle, in order to mitigate the risk of starting or maintaining connections with people suspected to be involved in money laundering and terrorism financing practices.

4.2.2 The KYC procedures include identifying, qualifying, and classifying customers.

4.2.3 Information related to customer registration data is updated periodically, with intervals based on current legislation analysis and risk criteria established by the Internal Risk Assessment.

4.2.4 CAIXA classifies its customers in risk levels considering AML/CTF aspects, as well as adopts differentiated treatment when conducting business, in accordance with the Internal Risk Assessment.

4.2.5 Registration data is qualified by collecting, verifying, and validating information that is compatible with the customer's risk profile and the nature of the business relationship.

4.2.6 Restrictive measures are adopted for the initiation and maintenance of customers relationships in situations of possible involvement in ML/FT practices.

4.2.7 CAIXA adopts compatible procedures and internal controls for customers qualified as Politically Exposed Person—(PEP), taking this condition into account when classifying risks and evaluating the interest in starting or maintaining a relationship.

4.2.7.1 Such PEP-related procedures and internal controls are also extended to representatives, family members, and close collaborators of these individuals.

4.2.8 CAIXA adopts procedures and internal controls that are compatible with situations in which it is not possible to verify the Ultimate Beneficial Owner.

4.2.9 Responsible unit: Internal Controls and Integrity Executive Board.

4.3 AML/CTF applied to Relationship with Employee / Manager, Partner and Supplier / Outsourced Service Provider

4.3.1 CAIXA adopts procedures to Know Your Employee/Manager (KYE), Know Your Partner (KYP), Know Your Supplier and Outsourced Service Providers (KYS/OSP), including identification, qualification, and risk classification, compatible with its AML/CTF Policy and Internal Risk Assessment.

4.3.2 The procedures aimed at establishing and maintaining relationships with employees/managers, partners, suppliers, and outsourced service providers also consider any updates that may result in a change of risk classification, in order to avoid links with individuals who may be involved in ML/TF suspicious practices.

4.3.3 CAIXA adopts procedures to confirm the information provided by employees/managers, partners, and suppliers/outsourced service providers in financial and non-financial transactions, both domestically and internationally, as well as to verify that these documents have been properly recorded and to evaluate the AML/CTF practices and procedures adopted by partners.

4.3.4 Prior to admission, CAIXA adopts procedures to verify that employees and managers commit themselves to the best practices of integrity for public service and that their names are not associated with any illegal practices.

4.3.5 CAIXA requires its employees and managers to maintain accurate records of their assets and income, including those derived from activities unrelated to their professional responsibilities at the company.

4.3.6 CAIXA requires its employees and managers to inform their immediate superior manager about any other professional activity or employment relationship with another company.

4.3.7 CAIXA adopts appropriate procedures and internal controls to monitor the financial transactions of its staff, employees, and managers, with the aim of identifying ML/TF suspicious transactions and situations, as well as reporting them to the regulatory bodies.

4.3.8 CAIXA relationship with an employee/manager, partner or supplier/outsourced service provider may be interrupted when a possible association to ML/TF practices is identified or non-compliance with regulations or contractual clauses that encourage M/TF by third parties.

4.3.8 In the event that a potential link to LD/FTP practices or non-compliance with regulations or contractual clauses encouraging LD/FTP by third parties is identified, the relationship with the employee/manager, partner, or supplier/outsourced service provider may be terminated.

4.3.9 Responsible unit: Internal Controls and Integrity Executive Board.

5. RESPONSIBILITIES

5.1 CAIXA executives and directors should commit to the effectiveness and continuous improvement of the AML/CTF policy, procedures, and internal controls, as well as to put a governance structure in place to ensure compliance.

5.2 The director responsible for fulfilling the obligations set forth in the AML/CTF rules is in charge with approving the Internal Risk Assessment.

5.3 CAIXA General Secretariat is responsible for formally appointing the director responsible for fulfilling AML/CTF obligations before the Central Bank of Brazil (BCB).

5.3.1 CAIXA Senior Management is responsible for assessing AML/CTF matters.

5.3.1.1 For the purposes of assessing AML/CTF matters, CAIXA Senior Management should be defined as those collegiate bodies appointed by external regulations as the responsible board for the matter to be assessed.

5.3.1.1.1 In the absence of specification by external regulation, the collegiate body responsible for approving the matter will be defined based on the competencies provided for in the CAIXA Bylaws and the Internal Rules of the collegiate bodies.

5.4 All employees, managers and board members should acknowledge CAIXA AML/CTF Policy and should guide their actions in accordance with its guidelines.

5.5 Each CAIXA management unit is responsible to work along with security units in order to prevent, identify, mitigate, or control the inherent risks of its products, services, information protection, processes and/or channels under its management.

5.5 All employees and managers are required to sign the Term of Acknowledgement of AML/CTF Policy (PO006) and to attend AML/CTF training.

5.6 All employees, managers and board members are responsible to promptly report to the AML/CTF management division all situations of which they become aware of, in the course of their duties, that may indicate suspicions of ML/FT activity, whether carried out by customers, employees, managers and board members, partners, suppliers or service providers.

5.7 As the first line of defense, CAIXA units are responsible for mapping ML/FT risks and weaknesses related to products, services, and distribution channels under their management, as well as to take measures to mitigate those risks before making them available to the relationship network.

5.8 CAIXA branches and Service Points are responsible for keeping customer records updated in CAIXA proper system, as well as to provide the information obtained through the effective exercise of the procedures of Know Your Customer, to enable AML/CTF management division to process suspicious ML/FT proposals, operations, and situations.

5.9 CAIXA Branches and Service Points are responsible for performing as the first line of defense in AML/CTF processes, ensuring the proper handling of proposals, operations, and suspicious ML/FT situations, reporting them to the AML/CTF management division in accordance with current regulations.

5.10 CAIXA AML/CTF management division is responsible for performing Internal Risk Assessment to identify and measure the risk of CAIXA products, services and channels being used for the practice of ML/TF.

5.11 AML/CTF management division is responsible to monitor, screen, assess and report suspicious ML/TF operations and situations to the regulatory bodies.

5.12 AML/CTF management division is responsible for ensuring that all staff have access to communication channels for recording suspicious ML/FT proposals, operations, and situations identified during their activities.

5.13 AML/CTF management division is responsible for promoting AML/CTF organizational culture along with Marketing & Communication unit and Training & Development unit, addressed those activities to CTF, all employees/managers, partners, and suppliers/outsourced service providers.

5.14 AML/CTF management division is responsible for acting as the second line of defense for AML/CTF processes through the monitoring of products, services, and distribution channels, especially those that are more susceptible to being used for ML/TF practices, as well as defining procedures for the evaluation and prior analysis of new products, services, and technologies, in view of the risk of ML/TF.

5.15 As the AML/TF third line of defense, CAIXA Internal Audit division is responsible for reporting any risks or weaknesses identified in the AML/CTF process to the AML/CTF management division. the third line of defense.

5.16 The Ombudsman's Office is responsible for receiving and forwarding any complaints related to ML/TF that are submitted via the designated channels, to be processed by the AML/CTF management division.

5.17 Internal Comptroller division is responsible for promoting internal Disciplinary and Civil Liability Investigation, addressing irregular facts and the identification of responsibilities related to the involvement of employees/leaders in suspicious ML/FT situations, reported by the AML/CTF management division, in accordance with current regulations.

5.18 CAIXA Vice-Presidency of the Operating Agent is responsible for adopting the guidelines set forth in this herein policy, as well as in the current regulations applicable to CAIXA Lotteries, with the aim of preventing the use of its products and processes for the practice of ML/TF.