

## **Summary of the Policies and Procedures concerning Prevention of Money Laundering and Financing of Terrorism and Corruption**

Intesa Sanpaolo Brasil S.A – Banco Múltiplo (“ISPBR”) has implemented specific policies and procedures for the Prevention of Money Laundering , for Combating the Financing of Terrorism and Corruption (“AML / CFT”), which are applicable to all ISPBR Directors, Employees and eventual third parties.

Such policies are considered as adherent with the Brazilian and International laws, rules, regulations and best practices, particularly those applied by the European Union and United States.

The AML-related activities and controls at ISPBR are regulated by the “Guidelines for Prevention of Money Laundering and Combating the Financing of Terrorism”, established and approved by the ISPBR Senior Management and supported by other manuals, procedures and internal regulations, which determines the principles and responsibilities listed below:

- Compliance of ISPBR and all its activities to the laws, rules and regulations applicable to AML / CFT in domestic and foreign context, when not conflict with Brazilian regulations, as well as constant search for the application of best practices related to AML / CFT;
- Existence of a specific and independent structure (Compliance & AML Department) for the management and supervision of the ISPBR AML program, with autonomy for immediately reporting to the Senior Management of ISPBR and Intesa Sanpaolo Group Head Office in the event of suspicious or atypical activities;
- Implementation of a Compliance Program focused on the analysis and measurement of the risk of money laundering, violation of international sanctions, other illicit, situations of reputational risk and noncompliance with laws and regulations, being the result of such program reported regularly to the Senior Management of ISPBR and Intesa Sanpaolo Group Head Office, as well as for the Internal Audit;
- Duty of diligence of all Directors and Employees of ISPBR, with the requirement to report immediately to the Compliance & AML Department of any kind of activities considered as atypical or suspicious for the practice of criminal offences;
- Existence and implementation of “Know Your Customer”, “Know Your Supplier / Partner” and “Know Your Employees” processes, which are subject to periodic audit;
- Identification of customers and their Beneficial Owners, with electronic records of their respective data, as well as the carry out of a Quality Assurance process of Customer data as required by Brazilian regulations, and periodic refresh of customer information;
- Distinction of money laundering risk for each customer, with additional measures of diligence and prior approval of relationship for customers classified with an increased risk;
- Specific Due Diligence process for correspondent counterparties and banks, with the evaluation of its policies, procedures and controls related to AML / CFT;
- Existence of automated processes for detection of atypical and suspicious activities of AML / CFT involving customers and counterparties of ISPBR, with subsequent reporting via Suspicious Activity Report (“SAR”) for the “Conselho de Atividades Financeiras – COAF”, the Brazilian Financial Intelligence Unit;
- Maintenance of bank secrecy and confidentiality concerning the SARs reported to COAF;



- Evaluation of ISPBR products and services in order to identify risks of money laundering and other illegal conduct that they may cause, and mitigation of such risks;
- Training and annual refresh to all ISPBR Directors Employees about AML and corruption issues, as well as specific training for departments whose activities pose a higher risk of exposure for money laundering and other illegal conduct;
- Annual review of policies, procedures and controls related to AML / CFT;
- Specific process of prior analysis of third parties, suppliers, and partners related with ISPBR into situations that may incur reputational and regulatory risks for ISPBR, as well as the existence of specific clauses at the agreements between ISPBR and such parties about the possibility of breach of contract by ISPBR, at any time of the contractual relationship, in the event of third parties, suppliers and partners direct or indirect involvement in offenses such as Corruption and Bribery.

ISPBR will not start relationships with:

- Shell Banks / Companies: Financial institution or companies that has no physical presence in the country where it is established and / or for which it is not possible to identify the Beneficial Owners and / or master controllers;
- Entities found to be suspicious of involvement and / or convicted of offenses related to money laundering and terrorist financing;
- Entities present at UN, EU, OFAC (EUA) and others sanctions lists;
- Companies whose constitution and activities are considered obscure and atypical.

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