

COMPLIANCE POLICY, PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

Document: **PLD/FT 2020 Policy**

Version: **1.1**

Date: **06/20/2020**

Introduction

- This policy aims to define risk management concepts, rules and guidelines, such as for FFS, customers and the general public.
- This policy applies to all managers, members, employees and persons involved with FFS as a company.

On Responsibilities

It is Compliance's responsibility together with the committee, when applicable, and with the support of the company's management:

- To identify operational, legal and regulatory risks;
- To spread the culture of combating money laundering, crime and terrorist financing;
- To train, supervise and apply internal rules and procedures;
- To comply with laws and regulations, to set best practice policies in the combat against terrorist financing and money laundering;
- To notify and combat suspicious activities and emphasize the importance of KYC and KYE procedures.
- To determine monitoring activities of operations and communication procedures to regulatory authorities;

Responsibilities of the Compliance Committee:

- To define on issues where conflicts of interest may exist;
- To define Compliance Policy procedures;
- To examine and make decisions regarding risk in operations;
- To examine evidence, conduct or complaints that are inconsistent with the Compliance Policy;

To verify KYC, KYE and AML Risk Analysis.

FFS carries out procedures for globally prevention, using powerful tools that assist in the verification of transactions that may offer risks regarding money laundering and terrorist financing, with the KYC, KYE and AML verification procedures detailed below.

FFS reserves the right to refuse the transaction of its customers when considered suspicious, as well as to inform the appropriate authorities.

Know Your Client Policy (KYC)

As one of its main policies for preventing and combating money laundering and the financing of terrorist activities, we make a detailed analysis to know our clients (Know Your Client).

The registration is done by sending the information and documentation below: For

individuals:

- 1- Full name;
- 2- CPF, ID and issuing body or passport data (and submission of documents); 3 - Full Address (and proof);

For Legal Entities:

- 1 - Company Name and Trade Name; 2 - CNPJ;
- 3- Full Address;
- 4- Identification of the members and others involved, as well as the framework of the conditions provided for in paragraphs I, II and III of art. 1 of COAF Resolution No. 15/2007; if the person is politically exposed, COAF Resolution No. 16/2017 5 - Identification of the final beneficiaries or the registration of the measures adopted with the aim of identifying them, pursuant to art. 7, as well as their framework in any of the conditions provided for in paragraphs I, II and III of art. 1 of COAF Resolution No. 15/2017; if the person is politically exposed, pursuant to COAF Resolution No. 16/2017.

We request a selfie both for Individuals and Legal Entities (responsible member) that are not attended in person, holding the document with photo.

Definition of operational limits:

- 1- Low limit (60 thousand/year):
 - CPF and CNPJ Validation Procedure
 - Date of birth in the IRS
 - Enrollment status of the CPF/CNPJ in the IRS
 - Registration of death in the IRS

2- Average limit (less than one million and two hundred thousands / year):
Requirements of item 1 and the following risk analysis:

- Protest
- People on the OFAC's SDN list
- Arrest warrants
- Proceedings before the courts of Justice
- Criminal record

3- High limit (above one million and two hundred thousands / year)

Requirements of item 2 and the following risk analysis:

- Politically Exposed Persons
- Income Reports
- Bank financial activities (last three months)

Know Your Employee Policy (KYE)

FFS adopts a rigid and transparent position in the hiring of its employees, as well as the complete analysis of suitability and culture of combating money laundering, crimes and terrorist financing. It also promotes periodic training on the concepts of its Code of Ethics and Conduct and the present Policy.

Storage of Transactions and Information

FFS stores in a differentiated manner the transaction information or any other records requested by the regulatory bodies prior to the discard deadline.

Term

The policy applies to all FFS's employees, users and managers, to become effective on the date of approval by the Board of Executive Officers, and remains in force for an indefinite period; any and all amendments are communicated to those involved.

Final Considerations

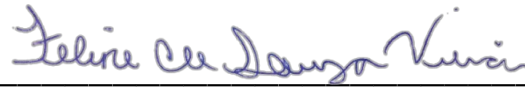
Our Compliance Policy may be amended and updated at any time by the Compliance area, upon approval of the FFS's Compliance Committee.

The lack of knowledge regarding any of the obligations and commitments arising here from does not justify deviations, and therefore, in case of doubts or additional clarification in relation to its content, please consult the Compliance area. Failure to comply with the provisions hereof or other related documents may result in disciplinary measures, administrative or judicial measures, and may lead to dismissal, reporting to the competent authorities or other penalties, including those arising from applicable legislation or regulations.

References

- Decree No. 5.640/2005
- PEP COAF 29/2017
- Decree No. 8.420/2015;
- CGU Integrity Manuals;
- Law 12.846/2013;
- Circular No. 3.461 (06/24/2009), Law 9.613/1998;
- Central Bank Circular Letter 3.542/2012
- Instruction CVM 301/1999 (ICVM 301)

06/20/2020

A handwritten signature in blue ink, reading "Felipe de Souza Vieira", written in a cursive style. The signature is positioned above a horizontal line.

Felipe de Souza Vieira
FF SOLUTIONS