



## POLICIES & INTERNAL STANDARDS

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MONEY LAUNDERING, FINANCING TERRORISM AND  
CORRUPTION (AML/CFT) PREVENTION POLICY

## **INTRODUCTION**

This Anti-Money Laundering, Terrorism Financing, and Corruption Combat Policy is applicable to associates, directors, employees, and outsourced professionals engaged in the provision of services and bestowed with access to sensitive or strategic, financial, technical, commercial, or business-related information within AGBI Real Assets ("Personnel"). ("Collaborators").

Everyone must have full understanding of the laws and regulations applicable to AGBI, as well as the complete content of this Policy and the other Integrity tools, such as the Code of Conduct & Ethics.

In case of questions or need for advice, it is essential to seek immediate assistance from the Compliance Officer and the Code of Conduct & Ethics.

### **I. OBJECTIVES**

The purpose of this Policy is to establish guidelines for AML/CFT prevention within the activities carried out by AGBI, in line with local legal and regulatory requirements on all jurisdictions AGBI operates, and was developed to prevent its employees from being used as a vehicle for illegal activities related to financial crimes, such as attempts to launder money for criminal activities or to fund terrorist actions.

AGBI created a policy that guides this policy with the aim of reinforcing to its Collaborators and outsourced professionals the importance of preventing, detecting early and mitigating risks of corruption, fraud, bribery, and other inappropriate conduct that may affect its image and reputation, as well as its business, and ensure that its activities continue to be conducted with the adoption of the highest standards of ethics, integrity, transparency and respect.

### **II. MONEY LAUNDERING**

Money laundering is the procedure used to disguise the origin of illegal funds, earned through criminal activity, but not restricted to drug trafficking, smuggling, kidnapping and corruption. Illicit funds can be laundered through financial institutions (commercial banks, investment banks and brokerages) and through a variety of other methods, such as transferring funds through legitimate business entities, and establishing relationships that make it difficult to identify true ownership or source of resources.

### **III. PREVENTION POLICY**

Any suspicion of financial and non-financial operations that may involve activities related to crimes of money laundering, concealment of goods and values and misappropriation, must be immediately communicated to the Compliance Officer or to one's immediate superior.

The analysis will be carried out on a case-by-case basis, with those responsible subject to the sanctions provided for in this Policy, including termination, exclusion, or dismissal for just cause, for partners and/or Collaborators, without prejudice to other applicable legal consequences, including those of a criminal nature.

The Compliance Officer, together with the Executive Committee, will be responsible for monitoring and supervising compliance with the AML/ACP. Fund administrators and distributors of AGBI's investment vehicles are responsible for verifying and applying the laws and rules that deal with the AML/ACP, as well as Know Your Client regulation.

AGBI will cooperate with the administrators and the distributors of its investment vehicles so that they: (i) adopt internal controls, in accordance with established procedures, to confirm the registration information of investors and keep them updated; (ii) identify politically exposed persons (PEP), as defined in each jurisdiction; (iii) more rigorously inspect the business relationship maintained with the PEPs; (iv) dedicate special attention to relationship initiation proposals and operations carried out with PEPs; (v) maintain rules, procedures and internal controls to identify investors who have become PEPs; and (vi) maintain rules, procedures and internal controls to identify the origin of the funds involved in the transactions of investors and users identified as PEPs.

AGBI must communicate to distributors all transactions, or transaction proposals, that may constitute evidence of serious crimes regarding "laundering" or concealment of assets, rights and values arising from the crimes included in article 1 ° of Law 9.613/1998, including terrorism or its financing, or relating to these.

### **IV. POLICY FOLLOW-UP**

In line with its commitment of cooperation, the Executive Committee will define the guidelines and supervise the implementation in AGBI of the Data Protection Policy, as well as supervise whether the administrator and distributors of investment funds adopt the necessary rules and internal controls.

## **V. ANTI-CORRUPTION POLICY**

All AGBI Collaborators must observe, comply with, and enforce the terms and conditions of this Policy, without prejudice to related legislation. For the purposes of this Policy, any form of Corruption will not be tolerated. Collaborators are prohibited from practicing the following conducts:

- a. promise, offer or give, directly or indirectly, an undue advantage to a Public Agent, or a third person related to him;
- b. finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for in the Brazilian Anti-Corruption Law or similar legislation in other jurisdictions;
- c. use an intermediary natural or legal person to hide or disguise their real interests or the identity of the beneficiaries of the acts performed;
- d. hinder the investigation or inspection activity of bodies, entities or Public Agents, or intervene in their performance, including within the scope of regulatory agencies and inspection bodies of the national financial system;

Also, in relation to participation in tenders and execution of administrative contracts, it is prohibited for Collaborators to:

- a. defraud, through adjustment, combination or any other method, the competitive nature of a public bidding procedure;
- b. prevent, disturb or defraud the performance of any act of public bidding procedure;
- c. remove or seek to remove bidders, through fraud or offering of advantage of any kind;
- d. defraud public bidding or contract resulting therefrom;
- e. create, fraudulently or irregularly, a legal entity to participate in a public bidding process or sign an administrative contract;
- f. fraudulently obtain an undue advantage or benefit from modifications or extensions of contracts entered into with a governmental body, without authorization by law, in the public bidding act or in the respective contractual instruments;
- g. manipulate or defraud the economic-financial balance of contracts entered into with Government agencies.

## **VI. FACILITATION PAYMENTS**

AGBI prohibits any type of Facilitation Payments (money or promises of other advantages for the personal benefit of a public agent), with the aim of accelerating a certain process.

## **VII. RELATIONSHIP WITH PARTNERS AND THIRD PARTIES**

In its relationship with Partners and Third Parties, AGBI determines that the following guidelines are observed, without prejudice to what determines the applicable legislation:

- a. The hiring of any Partner or Third Party is subject to the "Due-Diligence" process, to assess the background, reputation, technical qualifications, financial situation, credibility and history of compliance with Brazilian Anti-Corruption Laws;
- b. As of the date of disclosure of this Policy, AGBI will include an anti-corruption clause in its relevant contracts entered into with Partners and Third Parties, as recommended by the Compliance Officer;
- c. All Partners and Third Parties currently contracted, and those with whom AGBI enters into a contract, must adhere to the terms and conditions of the Code of Conduct & Ethics, this Policy and other AGBI policies, through the specific clause expressed in all contracts;
- d. The suspicion or knowledge, by any Collaborator, of the practice of an act in violation of this Policy or other AGBI policies, or of any other inappropriate conduct, must be reported to the Compliance Officer or to the Collaborators the immediate superior.

## **VIII. MERGERS AND ACQUISITIONS OPERATIONS**

Any and all merger or acquisition of a company or asset that AGBI may carry out will be preceded by a corruption risk analysis process and/or "Due diligence".

The assessment and review of risks must take into account the compliance of the invested or acquired company with the Anti-Corruption Law and the legislation applicable to the sector in which the mentioned company operates, paying special attention to the regularity of licenses, authorizations, certificates, permits and other points of contact with government agencies.

In any case, after the completion of the merger or acquisition, AGBI will carry out a compliance analysis between its integrity program and that adopted by the investee or acquired company, considering the applicable legislation, in order to implement the measures of required compliance.

## **IX. SANCTIONS**

This Policy, together with the Code of Conduct & Ethics, is an integral part of the rules governing the corporate or employment relationship. Collaborators who sign the term committing to

comply with this Policy are expressly accepting the principles established therein.

Violation of any of the rules and guidelines described herein will be considered a breach of contract, subjecting its author to the applicable penalties. If AGBI becomes liable or suffers damage of any nature for acts of its Collaborators, it may exercise the right of recourse against those responsible.

The sanctions resulting from non-compliance with the principles established in this Policy will be defined by the Code of Conduct & Ethics and other AGBI policy documents. The Executive Committee has the right, at its sole discretion, to execute such policies, so long as, the suspected Collaborator is guaranteed the right of defense and appeal established in AGBI's policy documents.

Among others, penalties of warning, suspension, termination, or dismissal for just cause may be applied, in the latter case, pursuant to article 482 of the Consolidation of Labor Laws - CLT, without prejudice to AGBI's right to claim compensation for any damages borne, losses and damages and/or loss of profits, through the appropriate legal measures.