



INTERNAL CONTROLS MANUAL
POLICIES & INTERNAL STANDARDS

KNOW YOUR CLIENT POLICY

1) General Principles

Regarding the prevention and combating money laundering, financing of terrorism and corruption (AML/CFT), AGBI Real Assets, in accordance with external requirements and the internal control system, performs by itself, or through partners, a series of activities, as described in the Money Laundering, Financing Terrorism And Corruption (AML/CFT) Prevention Policy:

- a) use of the "know your client" ("KYC") policy;
- b) identification of areas and processes susceptible to risk in AGBI's Risk Prevention Policy;
- c) carrying out adequate training for employees;
- d) definition of rules and procedures for carrying out operations;
- e) maintenance of permanently updated customer records, considering quantitative and qualitative information (compatibility between your economic and financial situation and your transactions);
- f) appointment of *Compliance* Officer and adherence of the organization's practices to this policy.

In the administration and management of its investment funds, AGBI Real Assets counts on the support and partnership of the Fund Administrators to apply the KYC policy to all its clients, which includes prior analysis and acceptance of the client, and continuously after its entry, carrying out periodic analyzes of the registration documents, visits to evaluate the investment profile, economic activity, financial capacity and source of funds.

The KYC Policy of AGBI Real Assets must be followed by all its employees and partners and any activity that is actually or supposedly in disagreement with this policy must be immediately reported to the institution's *Compliance* Officer.

2) The KYC Policy of AGBI Real Assets involves:

- a) adopt the necessary precautions to fully identify customers, maintaining full knowledge of the transactions carried out, acting in a preventive manner;
- b) pay particular attention to situations involving:
 - transaction of dubious origin or incompatible with the customer's economic and financial capacity;
 - existence of dubious connections and links with other legal or physical entities;

- transactions carried out using cash;
- relationship involving Politically Exposed Persons, their family members and/or related persons, adopting specific procedures to authorize the start of business establishments, including client acceptance, as well as exercising reinforced monitoring of the transactions and movements of these clients;
- relationship involving a company (legal entity) that may be operating on behalf of "third parties";
- relationship involving an individual or legal entity that has an inconsistent or fictitious address;
- relationship with an individual or legal entity that operates in the "parallel market" or whose segment of activity registers notorious public exposure in situations of currency evasion, practices of adulteration, counterfeiting or fraud in its products or services;
- relationship with an individual or legal entity, notorious or publicly mentioned for alleged participation in cases of embezzlement, kickbacks, bribery or corruption, whether or not involving a public agent or entity;
- relationship with a legal entity incorporated in a low tax jurisdiction "off-shores", in which it is not possible to know and identify, ultimately, the individual or the final beneficiary who holds the origin of the funds transacted;
- relationship with a natural or legal person, entity or country suspected of involvement in terrorism activity, belonging to or financing criminal activity or organization, including all those identified in Restrictive Lists publicly issued by the National and International Organizations.

This document may be modified from time to time, in accordance with the conduct committee and the *AGBI Compliance Officer*.