



Financial crime risk policies

ExtractoDAO (all companies owned or controlled by ExtractoDAO Group) is committed to implementing minimum standards of control in all jurisdictions in which it operates.

ExtractoDAO has established a Global Anti-Money Laundering Policy (“AML Policy”) for this purpose. The purpose of the AML Policy is to identify and properly manage the money laundering risks identified by ExtractoDAO. This is achieved by establishing and implementing appropriate processes, systems and controls to protect ExtractoDAO, its customers, shareholders, employees and the communities it serves from money laundering. The AML Policy sets out the minimum standards of control for all entities and employees of the ExtractoDAO group, requiring them to conduct business in accordance with applicable AML laws, rules and regulations.

The AML Policy is informed by applicable laws, regulations, regulatory guidance and best practices from various authorities and countries. In cases where there are material differences between the rules and regulations of these authorities or countries, the AML Policy adopts the highest standard, recognizing the primacy of local law.

ExtractoDAO is committed to fighting financial crime and complying with all applicable sanctions laws and regulations in the jurisdictions in which we operate. One of the ways we achieve this goal is through ExtractoDAO's Global Financial Crime Policy (the "Policy"). Subject to the primacy of local law and considering the broader risk of financial crime, the Policy seeks to establish a globally consistent standard for effectively managing sanctions compliance risk across all legal entities wholly or majority owned or controlled by ExtractoDAO, helping us to protect the global financial system, our reputation and to better serve our customers. The Policy generally prohibits relationships or transactions



involving sanctioned individuals and entities or sanctioned countries, territories and their governments broadly.

In accordance with our regulatory requirements and our Policy, we may be asked from time to time to reject transactions, freeze assets or refuse to provide services. It also means that, at times, our policy and risk appetite for sanctions may be stricter than our legal obligations, and we may choose not to support certain customer relationships or business activities, even if these are legally permissible. ExtractoDAO may, in its sole discretion, agree to process certain transactions prohibited or restricted by the Policy that are authorized by a license from an appropriate authority or are permitted by applicable laws and regulations, such as those relating to humanitarian aid. These transactions will be considered by ExtractoDAO on a case-by-case basis.

ExtractoDAO operates with a strong commitment to ethical practices and has zero tolerance for bribery and corruption. We consider such activities to be against good corporate governance and in violation of our principles. ExtractoDAO, its staff, and associated persons are strictly prohibited from engaging in any form of bribery or corruption.

Our Anti-Bribery and Corruption (AB&C) Policy outlines the key principles and minimum control requirements that enable ExtractoDAO to mitigate the risks associated with bribery and corruption, ensuring compliance with all relevant laws and regulations, including the The UK, the Brazil Bribery Act, US Foreign Corrupt Practices Act, HK Prevention of Bribery Ordinance, France Loi Sapin II, and similar legislations in the countries of our operations.

Minimum Standards



The AB&C Policy establishes the minimum standards that all entities within the ExtractoDAO Group must adhere to. These standards include the following key principles:

Conducting business without the intent to bribe or corrupt.

Acting reasonably and transparently in all activities.

Avoiding lavish or disproportionate actions in professional relationships.

Documenting all activities with a clear business rationale.

Requiring appropriate authorization at a senior level.

The AB&C Policy further supports these key principles by setting minimum standards across four pillars:

Staff: All staff members, including permanent and fixed-term employees, contractors, and consultants, must ensure that their interactions and relationships do not involve or appear to involve improper actions to gain or retain a business advantage. This includes guidelines for gifts, entertainment, charitable donations, sponsorships, training, speaker fees, and hiring, along with clear requirements for recording, approval, and escalation of any additional benefits.

Associated Persons: The AB&C Policy mandates the identification, recording, and completion of appropriate due diligence for all associated persons within ExtractoDAO.

Customer: Customers are prohibited from using ExtractoDAO products and services to facilitate bribery or the receipt of funds from corrupt activities. Risk-based controls, including customer due diligence, transaction monitoring, and customer exit requirements, are implemented to prevent such misuse.



Strategic: All strategic activities undertaken by ExtractoDAO must identify and mitigate any bribery or corruption risks. The AB&C Policy sets out minimum standards for due diligence, integration of AB&C controls, and risk management in strategic and proprietary investments and disposals, new product and service design, and corporate real estate transactions.

Oversight

The AB&C compliance program and policy of ExtractoDAO are overseen by the Board of Directors of the company. It is mandatory for all staff members, directors, and associated persons to comply with the principles outlined in the AB&C Policy. We provide annual mandatory AB&C training to all staff, with additional targeted training tailored to specific roles.

We regularly conduct risk assessments, monitoring, and testing of our AB&C program, and any relevant findings are incorporated into the AB&C Policy. Additionally, we maintain clear whistleblowing policies and processes to ensure that individuals can confidentially report any concerns they may have.

ExtractoDAO is committed to maintaining strong Know Your Customer (KYC) practices and implementing effective measures to identify and manage financial crime risks. We prioritize intelligence-based approaches to enhance our capabilities in this area.

For third-party banks or vendors seeking AML or KYC due diligence information, including the detailed Wolfsberg Correspondent Banking Due Diligence Questionnaire (CBDDQ), we encourage the use of the SWIFT KYC Registry, a comprehensive data exchange platform. This platform enables the collection of relevant data and documents to facilitate the due diligence process. Therefore,



we recommend utilizing this service as the primary means to access the required information.

In the event that the desired information is not available through the SWIFT KYC Registry, please feel free to send an email request directly to ExtractoDAO using the following email address: Our team will promptly review your request and provide the necessary assistance.

To provide additional insight into ExtractoDAO's financial crime risk management, we offer the Wolfsberg Financial Crime Compliance Questionnaire (FCCQ) and the ISSA (International Securities Services Association) Questionnaire. These documents provide an overview of our policies and processes related to financial crime risk management.

If you have any further inquiries or require clarification, please do not hesitate to contact us. We are dedicated to maintaining a high standard of compliance and transparency.

Sincerely,

Curitiba, 07/04/2023

Mr. Joel Almeida Santos, Chief Executive Officer

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EXTRACTO DAO LTD