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3.1. Know Your Client Policy (KYC)	July/22	V1.0	1 / 5

The Know Your Client (KYC) Policy is one of the pillars that make up the PML-CFT program of Marsam and its purpose is to inhibit the beginning or maintenance of business relationships with clients whose activities are linked to the crime of money laundering and/or terrorism financing, or any other unlawful, illegal, or unethical activity.

The achievement or maintenance of business relationships with clients should always be based on the transparency and honesty of their activities within the 'Know Your Client' concept, and not only by the commercial interest and/or financial profitability that clients can provide to Marsam.

The concept of "Know Your Client" is based on the perfect identification of the client in accordance with the procedures described in chapter 2 - *Client on Boarding Procedures* of this manual.

Identification is the act of confirming who a client claims to be by providing its registration information, which should be verified through a thorough examination of the documents provided, that is, the documentary evidence should be satisfactory and reliable for the perfect identification and registration of the client.

In the case of legal entity clients, it will also be essential to know who are the ultimate beneficiaries' owners until reaching individuals whose direct or indirect equity interest is greater than 5% (five per cent) of total ownership stake.

In addition to the information and registration documents provided by the clients, several verifications will be carried out about the client prior to the beginning of the business relationship and upon its registration renewal, such as:

- Federal Revenue Service (SRF) to validate the tax domicile and registration status of the Individual Taxpayer Identification Number (CPF) and/or Corporate Taxpayer Identification Number (CNPJ) of the client.

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- Office of Foreign Assets Control (OFAC): restrictive list of names linked to international terrorist activity and terrorism financing activities.
- Ministry of the Environment: List of Environmental Embargoes and Notices of Violation.
- Federal Court System: Court Procedures Electronic Certificate (TRF).
- Financial Intelligence Unit (COAF): List of Politically Exposed People (PEP-SISCOAF);
- Office of the Federal Controller General: National Registry of Disreputable and Suspended Companies (CEIS).
- Google: Adverse Media research ("Client Name" + Crimes).
- National Mining Agency (ANM): PLG Validation and Mining Permits.
- Central Bank of Brazil (BACEN): Confirmation of Authorization for the Operation of Financial Institutions.

If it is found that the client appears on a restrictive list, or negative news has been identified in the media, mainly related to financial, environmental, and human rights crimes or crimes related to slave or child labor, involving the client, its partners or management, the CIC must be notified immediately.

The client on boarding documentation required by Marsam may be stored electronically or physically, including evidence of restrictive lists checks and any other verifications and research carried out during the on boarding process.

The compatibility between the activity of the client and the purpose of the business relationship with Marsam should be evaluated, in addition to the adequacy of its presumed financial capacity with the client intend declared volumes of precious metals to be the object of provision of several services by Marsam.

In order to comply with this Policy, Marsam may determine that Compliance visits are carried out to the client, before or after the beginning of the business relationship, whenever it deems it is necessary to validate the information or to analyze, in loco, the effective performance of the business activities

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declared by the clients, or even as a way to know the internal processes developed by clients with a focus on preventing money laundering, combating the financing of international terrorism, preventing bribery and verifying the supply chain and the origin of precious metals, mainly to identify possible precious metals that have originated from conflict-affected or high-risk areas as defined by OECD ('CAHRA's').

In the case of Mining Companies clients (LSM – Large Scale Mines), Marsam should visit the extraction sites prior to initiate business relationship or at last 180 (one hundred and eighty) days after it had start, and keep a periodic plan of visits, to assess presence and severity of abuses associated with the extraction, transport or trade of precious metal, including among others, any forms of torture, cruel, inhuman and degrading treatment, any forms of forced or compulsory labor, any form of child labor, other human rights violations, sexual or gender violations, war crimes, international humanitarian laws violations, crimes-against humanity, genocide, support or presence of non-state armed groups or public or private security forces.

For the LSM visits, the Onsite Risk Assessment Template as defined on section 3.9 of this manual must be fulfilled and signed by the staff member responsible for the visit.

For the purposes of this Policy, Politically Exposed People ('PEP') will be considered as public agents who perform or have performed, in the last five years, in Brazil or in foreign countries, territories and dependencies, relevant positions, jobs or public functions, as well as their representatives, family members and others in their close relationship.

In the case of Brazilian clients, the following should be covered: elected representatives of the Executive and Legislative Powers of the Union; holders of positions in the Executive Power of the Union; Minister of State or equivalent; of a special nature or equivalent; President, Vice-President, and Director, or equivalent, of Indirect Public Administration Entities; and Senior Management and Advisory (DAS) group, level 6, or equivalent.

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Members of the National Council of Justice, Federal Supreme Court, Superior Courts, Regional Federal Courts, Regional Labor Courts, Regional Electoral Courts, Superior Council of Labor Justice and Federal Court System Council.

Members of the National Council of the Prosecution Office, the Federal Attorney General, the Federal Vice-Attorney General, the Labor Prosecutor, the Military Prosecutor, the Deputy Attorneys General and the Attorneys General of the States and Federal District, members of the Federal Accounting Court, Prosecution Office Attorney General and Sub-Attorneys General at the Federal Accounting Court.

Presidents and National Treasurers or equivalent of political parties, Governors and Secretaries of States and Federal District, State and District Deputies, Presidents or equivalent of State and District Indirect Public Administration Entities and Presidents of Courts of Appeals, Military Courts, Accounting Courts or equivalent of States and Federal District.

Mayors, City Councilors, Local Secretaries, Presidents or equivalent of Local Indirect Public Administration Entities and Presidents of Accounting Courts or equivalent of municipalities.

People who abroad are Heads of State or Government are also considered to be PEP as well as: Senior Politicians; Senior Government Officials, General Officials and Members of Higher Levels of the Judiciary; Senior Executives of Public Companies, or Political Party Leaders.

Senior Managers of Public or Private International Law Entities will also be considered PEP.

In the case of clients residing abroad, Marsam will adopt at least two of the following measures:

- Request an express statement of the client regarding its PEP qualification.

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- Use publicly available information, or
- Consult international databases, public or private, on Politically Exposed People.

The PEP condition should still be applied for five years following the date on which the person ceased to perform the duties or ended the relationship.

Relatives, in the straight line, up to the second degree, the spouse, partner, stepson and stepdaughter, and the close collaborator will also be considered family members.

Clients identified as PEP or that have in their corporate boards, management or attorneys, individuals identified as PEP, will be subject to reinforced monitoring and classified as high-risk clients.

Those who have in their supply chains suppliers that operate in conflict-affected or high-risk areas as defined by the OECD ('CAHRA's'), in border areas or for which the perfect origin of the precious metals is not definitively identifiable will be classified as high-risk clients and should be subject to reinforced monitoring of their transactions by the CIC.

This Policy should be reviewed at least every 3 (three) years from the date of its last review, or at any time, in the event of a relevant fact or changes in applicable legislation.

This Policy should be disclosed to all employees, clients and suppliers and be made available and updated on the website of Marsam.