

Subject	Issue Date	Edition	Page
3.2 Know Your Employee and Your Regular Service Provider Policy (KYE)	July/22	V1.0	1 / 2

The Know Your Employee and Your Regular Service Provider Policy (KYE) Policy is another of the pillars that make up the compliance program of Marsam and its purpose is to inhibit the hiring of employees or service providers that do not have a good reputational record or that have indications of present or past activities related to criminal activities.

The recruitment and selection process of employees for Marsam will include the verification of previous professional references of the candidate, as well as the existence of disreputable facts, including, when possible, the verification of the police record of the candidate, preserving his/her confidentiality and dignity, including media research.

Each new employee hired by Marsam will receive a copy of this Manual of Internal Controls, as well as specific training on the topic of combating money laundering and international terrorism financing.

Marsam will monitor the external signs of wealth and the evolution of the assets of its employees with the objective of detecting sudden and/or incompatible changes in the economic standards of its employees, which may indicate involvement in illegal or fraudulent activities.

Service providers to be contracted by Marsam should comply with the legal requirements necessary for the activities object of the contract and should maintain confidentiality about any confidential information of Marsam and its clients that they may have access throughout the provision of services, either due to the nature of the service or because of the service agreement signed with Marsam.

Whenever possible, Service Agreements will be signed with service providers, which should contain statements by the service provider regarding compliance with procedures to prevent money laundering and international terrorism financing, anti-corruption prevention procedures, absence of slave labor and child labor and sustainable socio-environmental practices.

Subject	Issue Date	Edition	Page
3.2 Know Your Employee and Your Regular Service Provider Policy (KYE)	July/22	V1.0	2 / 2

All services provided to Marsam should be subject to the issuance of the respective Service Invoice and will be paid by bank issued invoice or bank transfer to an account held by the service provider; payments to third parties or cash payments are not allowed.

Negative media research will be carried out prior to hiring any new service provider, as well as its registration status will be checked with the Federal Revenue Service and certificates evidencing regular compliance with its labor and/or tax obligations may be requested.

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.