

## Ombudsman Policy

### I. Introduction

Conselho Monetário Nacional, by Resolution 4.860 of 23 October 2020 ('Resolution CMN 4.860/2020'), and Banco Central do Brasil ('BACEN'), by means of Instrução Normativa BCB No 265 of 31.3.2003 22, as well as the Comissão de Valores Mobiliários (CVM), by Resolution No 43 of 17 August 2021 ('Resolution CVM No 43/2021'), determined and regulated the establishment and functioning of the organizational component of the Ombudsman by institutions authorized to operate by BACEN and acting within the regulated securities market by the CVM, which, respectively, (i) have as customers natural persons, including individual entrepreneurs, or legal persons classified as micro and small enterprises, in accordance with Supplementary Law No 123 of 14 December 2006, and/or (ii) are members of the Brazilian Distribution System and/or act as custodian of securities.

#### I.A. Objective

This policy of ombudsman ("Politics") is intended to provide wide publicity as to the existence of the organizational component of the ombudsman's office of Sumitomo Mitsui Brasileiro S.A. ("SMBCB"), of the activities carried out by the SMBCB, and to formalize the guidelines for its composition in order to ensure strict compliance with the laws and regulations in force by all SMBCB employees.

### II. Purpose of the Ombudsman

The Ombudsman represents the link between SMBCB and its customers, with the aim of ultimately meeting the demands of customers or users (or any other legally equivalent to them) of products and/or services offered by SMBCB ("Applicants"), which have not been solved in SMBCB's primary service channels and acting as a communication channel between SMBCB and the Applicants, including conflict mediation ("Purpose"). For the purposes of regulation and of this policy, "primary" is the usual service carried out at any points or service channels, including the correspondents in the country and the Consumer Service (SAC), in which Decree No 6,523, of 31 July 2008, deals.

In addition to acting as a conflict mediator and communication channel between SMBCB and users of its products and services, the Ombudsman's commitment is also to contribute to the continuous improvement of (i) products, (ii) service delivery, and (iii) customer and user support for SMBCB products and services.

### III. Principles and rules of conduct and action

The activities of the SMBCB Ombudsman are guided by the following principles: (i) transparency; (ii) independence; (iii) impartiality; and (iv) exemption. In addition, the Ombudsman should respond fully and precisely to all the demands made, and in accordance with the following rules of conduct and conduct:

- (a) carrying on their activities in good faith and professional ethics;

- (b) the elimination of disproportionate formalities and requirements for the submission of demands, the existence of minimum information for the identification of the demand and of the Applicant;
- (c) use of simple and accessible language, avoiding the use of expressions that are not understandable or that are inappropriate to the applicant's profile and degree of understanding; and
- (d) standardization of procedures for access to the Ombudsman, including the availability of standardized, easily understandable forms for the most common demands.

If the subject matter of the claim submitted by the Applicant falls within the competence of another institution, the SMBCB Ombudsman shall inform the Applicant accordingly and, where possible, instruct the Applicant on which competent institution to provide the relevant clarification.

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## IV. Demands

The Ombudsman shall verify that the Applicant's report is within its competence, following the purpose of the Ombudsman mentioned in item I (Introduction) above, as provided for in Article 3, paragraphs I and II and the sole paragraph of Resolution CMN No 4.860/2020:

### IV. A.1. Claims of Incompetence of the Ombudsman (Dismissible Claims)

Dismissible Claims shall be:

- I. Information, Advertising, Curriculum, or spam: the receipt of e-mails or letters addressed to the ombudsman which relate to information, advertisements, curricula or spam are not covered by the ombudsman and should not be registered in the area's internal control given the content of these contacts;
- II. Request for eminently operational procedures: where these are not necessarily requests for connection transfer or contact;
- III. Demand within the SMBCB primary channel servicing deadline: demands that are still being dealt with by the Consumer Service - SAC, for example, within the legal deadline;
- IV. Demands from non-customers and/or non-users of SMBCB products and services: demands dealing with customers and/or users of products and services from other institutions;
- V. Misleading: this is not intended for SMBCB;
- VI. Request for Information: provided that it does not deal with SMBCB products and/or services or that it is not done by customer and/or user of SMBCB products and/or services, or that it does not constitute potential or existing conflict for SMBCB or its economic group entity, Unfounded Claims shall be considered.

### IV. A.2. Onbudsman Competence Demands (Demands Resulting)

- I. In principle, they are those that do not fall within the competence of the Ombudsman and serve the purpose of the Ombudsman, i.e. last-resort and

acting as a communication channel between SMBCB and its customers and/or users of products and services;

- II. Requests for Information may be considered as a demand for the Ombudsman's expertise when dealing with SMBCB products and/or services or when they are ultimately requested by customers and/or users of SMBCB products and/or services, or, if not ultimately requested, constitute potential or existing conflict for SMBCB; and
- III. The Ombudsman may also conduct the processing of demands even when the Applicant has not previously contacted primary SMBCB service channels, such as the Consumer Service - SAC, where it identifies that SMBCB or its economic group entity is, or may be, directly exposed to risk of loss and/or damage to its reputation or image.

## **V. Activities and obligations**

### **V.A. Activities of the Onbudsman**

As regards the services provided by SMBCB in the financial market, the following activities are considered to be the tasks of the Ombudsman and, consequently, of the Ombudsman:

- meet, register, instruct, analyze, treat formally and appropriately the demands of the Applicants;
- to provide clarification to the applicants on the progress of the demands by informing them of the deadline for reply;
- to send the Applicant a conclusive response to the demand within the legally foreseen deadline;

Already as part of the services provided by SMBCB in the capital market, the Ombudsman's responsibility is to receive, register, analyze, instruct and respond to consultations, suggestions, complaints, criticisms, praise and complaints from clients who have not been satisfactorily addressed by the institution's usual channels of care, and the Ombudsman should take steps to:

- Communicate with SMBCB's internal organizational components to obtain the clarifications and steps required for demand instruction and resolution, while maintaining follow-up to ensure that the customer is answered within the set deadlines;
- To provide clarification to the Applicants on the progress of the demands by informing them of the deadline for reply; and
- To act as a broker for conflicts between the institution and customers.

### **V.B. Ombudsman Service**

The service provided by the Ombudsman shall be maintained in a system of information and control of the demands received and shall:

- be identified by protocol number and informed to the Applicant;
- be recorded by telephone and, where carried out by other means of written or electronic document, the relevant documents shall be stored;

- be recorded internally in the attendance register, together with the information used in the analysis and the steps to be taken.

#### **V. B.1. Deadlines for Replying to the Applicant**

The final deadline for replying to requests shall not exceed the legal limit of 10 (10) working days and may be extended, exceptionally and justifiably, once only for an equal period, limited to 10 % of the total demand in the month and the Applicant shall be informed of the reasons for the extension and the expected time to remedy the event.

When it is specifically a case of a demand received through the CVM / SAC-CVM Citizen Service (SAC), or having as its object the complaint or information about SMBCB products or services resulting from its action in the securities market, the deadline for submitting a conclusive reply to the Applicant, as provided for in Article 7(2)(I) of Resolution CVM No 43/2 15 (fifteen) calendar days from the demand protocol date and may be justifiably extended, provided that the Applicant is informed of the reasons for the extension and the expected time for the resolution of the event, and the final response does not exceed 60 (sixty) days. In addition, the assistance provided by the Ombudsman and the arrangements and solutions adopted shall be reported to the Office for Guidance and Protection of the Investors of the CSD - SOI within a maximum of 15 (fifteen) days.

The ombudsman will terminate the procedure when forwarding the Final Response to the Applicant.

#### **V. B.2. Quality Assessment of Service**

The Ombudsman has a telephone tool for directly assessing the quality of service to customers and users of SMBCB products and services, structured so as to obtain notes between 1 and 5, with 1 the lowest satisfaction level and 5 the highest satisfaction level.

The assessment shall be made available by 1 (one) business day after the submission of the final response to the Applicant and shall be completed by 5 (five) working days after the end of the aforementioned availability period in accordance with the CMN Resolution No 4 860/2020

#### **V. B.3. Service Log**

In compliance with the provisions of Resolution CMN No 4.860/2020, the information on the demands received by the ombudsman should remain recorded in the information and control system for a minimum period of five (05) years from the date of protocolization of the occurrence by the Applicant.

#### **V. B.4. Maintenance of service documents, reports, and recordings**

In the same vein, the ombudsman shall keep the reports and documents relating to the services provided, as well as the telephone records of the service, available to BACEN and the CVM and any other competent authority at the headquarters of the institution for at least five (5) years from the date of the protocol by the Applicant, together with the documentation and arrangements adopted in the particular case.

The quality of service assessment data provided will also remain available to BACEN and the CSD, and any other competent authority for at least five (5) years from the date of the assessment carried out by the Applicant, in which case the quality of service assessment data will be sent to BACEN in the form defined by the applicant in Circular Letter No 3.880/20 18.

## VI. Tasks of the members of the Ombudsman

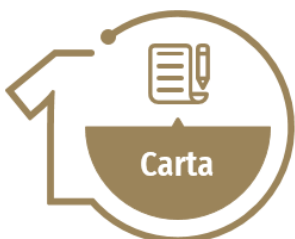
### VI.A. Assignments by the Holder and other ombudsman

The duties of ombudsman towards the Applicants are:

- a. meet, register, instruct, analyze, treat formally and appropriately the demands of the Applicants;
- b. to provide clarification to the applicants on the progress of the demands by informing them of the deadline for reply; and
- c. to send the Applicant a conclusive response to the demand within the legally foreseen deadline;

## VII. Service Channels

In order to ultimately meet the demands of customers and/or users (and/or any other legally equivalent to them) of SMBCB products and/or services ("Applicants") that have not been solved in SMBCB primary communication channels and, exceptionally, to meet first-instance demands, the SMBCB Ombudsman offers 3 (three) forms of official service:



Endereçada ao Banco  
Sumitomo Mitsui  
Brasileiro S.A.  
Av. Paulista 37, 11º e  
12º andares  
Bela Vista – São Paulo  
– SP  
CEP 01311-902



[ouvidoria@smbcgroup.com.br](mailto:ouvidoria@smbcgroup.com.br)  
Canal de comunicação com a  
Ouvidoria do SMBCB através de  
endereço de e-mail eletrônico  
controlado e observado  
durante dias úteis das 10:00 às  
16:00hs



0800 722 2762  
Serviço de discagem  
direta gratuita (DDG)  
com atendimento aos  
clientes e usuários de  
produtos e serviços  
durante dias úteis das  
10:00 às 16:00hs