

Ombudsman Policy

I. Introduction

The Securities Commission (CVM), by Resolution No 43 of 17 August 2021 ('Resolution CVM 43'), determined and regulated the establishment and functioning of the organizational component of the Ombudsman that act within the regulated securities market by the CVM, which, respectively, are members of the Brazilian Distribution System and/or act as custodian of securities.

I.A. Objective

This Ombudsman Policy ("Policy") 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 usual 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, "usual" 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 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 must verify whether the Applicant’s report falls within its scope, observing the purpose of the Ombudsman Office, as set forth in Item I (Introduction) above, in accordance with Article 1, Sole Paragraph, items I, II, and III of CVM Resolution 43.

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

Dismissible Claims shall be:

- I. Information, Advertising, Curriculum, or spam: 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: which may be exemplified, in a non-exhaustive manner, by means of call transfers or initiating 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. Requests originating from individuals who do not qualify as clients or users, or potential clients or users, of the products and services offered by SMBCB: that is, requests concerning clients and/or users of products and services from other institutions.
- V. Misleading: understood as the occurrence of a request not intended for the 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;
- VII. Test Record: meaning the performance of tests by Internal Audit, the Compliance Department, and the Information Security Department.

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

- I. In principle, these are all requests received that fall within the scope of the Ombudsman’s role, except for those classified as outside the Ombudsman’s jurisdiction;
- II. Requests for Information may eventually be considered within the Ombudsman’s scope when, as a last-instance response by the Ombudsman: (i) they concern products and/or services offered by SMBCB; or (ii) they are submitted by clients and/or users of the SMBCB’s products and/or services; or even, although not formally submitted as a last-instance request to the bank’s Ombudsman, (iii) they represent a potential or existing conflict for SMBCB.
- III. The Ombudsman may also conduct the processing of demands even when the Applicant has not previously contacted usual 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 Onbudsmen

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 develop statistics and reports on the requests received, in order to support the adoption of measures that mitigate the occurrence of operational and service failures, with the aim of contributing to the improvement of internal controls and the quality of services provided in the securities market; 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

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 43, 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.

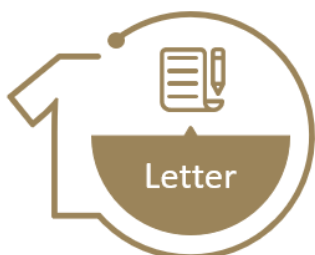
V. B.2. Maintenance of service documents, reports, and recordings

The ombudsman shall keep the reports and documents relating to the services provided, as well as the telephone records of the service, available to 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 CVM, and any other competent authority for at least five (5) years from the date of the assessment carried out by the Applicant.

VI. 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 usual communication channels and, exceptionally, to meet first-instance demands, the SMBCB Ombudsman offers 3 (three) forms of official service:



Addressed to Banco Sumitomo Mitsui Brasileiro S.A.
Av. Paulista 37, 11th and 12th floors
Bela Vista – São Paulo – SP
CEP 01311-902



ouvidoria@smbcgroup.com.br
Communication channel with the SMBCB Ombudsman through a controlled and monitored electronic email address on business days from 10 am to 4 pm



0800 722 2762
Toll-free direct dial service (DDG) with customer service and product and service users on business days from 10am to 4pm