

# **RULES AND PARAMETERS OF ACTION**

**BANCO SUMITOMO MITSUI BRASILEIRO S.A.**



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Version 4.0

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# I. Introduction

## I.A. Purpose

BANCO SUMITOMO MITSUI BRASILEIRO S.A., with headquarters at Avenida Paulista, 37, 11º andar, Bela Vista, CEP 01311-902, São Paulo, SP, enrolled with CNPJ/ME under No. 60.518.222/0001-22 (“**SMBCB**”), in compliance with the provisions of the Resolution issued by Comissão de Valores Mobiliários (“**CVM**”) No. 35, as of May 26, 2021, as amended (“**CVM Resolution 35**”), and with the objective of acting as an Intermediary in the organized trading and / or registration markets for financial assets and securities (“**Mercados Organizados**” – “**Organized markets**”) administered by B3 S.A. Brasil, Bolsa, Balcão, enrolled with CNPJ/ME under No. 09.346.601/0001-25 (“**B3**”), hereby defines under the terms of the Securities Intermediate Standards Manual (“**Manual of Standards**”) the rules that guide its performance in said markets (“**Rules and Parameters**”).

SMBCB appointed the executive officers responsible for the intermediation of securities and their supervision, as established in article 5 of Resolution CVM 35. Up-to-date information on the appointed officers can be consult through the CVM website ([www.cvm.gov.br](http://www.cvm.gov.br)), by consulting the General Register of Regulates, in SMBCB’s register as “Multiple Bank with Investment Portfolio”.

Capitalized words used but not defined herein shall have the meaning assigned to them in Resolution CVM 35, or in B3 Standards Manual, unless they are defined in these Rules and Parameters differently.

The Rules and Parameters, when applicable, will be an integral part of the Registration Form and / or the contract signed with the Client.

## II. Client Register

Before starting its operations in the Organized Markets managed by B3, the client must provide to SMBCB and keep updated all requested information (registration and necessary for the appropriate diligence and knowledge process of the “Know Your Customer” or KYC), by completing and signing the registration form with SMBCB, in addition to delivering copies of supporting documents and other documents that are necessary for this purpose, in accordance with legislation in force and global policies of the Sumitomo Mitsui Banking Corporation (“**SMBC**”), SMBCB’s controller .

Any changes in the Customer's registration data must be reported to SMBCB within 10 (ten) consecutive days from the event. The Client may inform such changes through the electronic address: [cadastro@smbcgroup.com.br](mailto:cadastro@smbcgroup.com.br).

In the process of identifying customers, SMBCB will adopt the following procedures:

- Customer identification and maintenance of updated records to the extent required by the regulations in force, in particular CVM Resolution No. 50, as of August 31, 2021, as amended (“**CVM Resolution 50**”), by the global policies of SMBC Group and by rules edited by B3;

- In the case of simplified registration of Non-Resident Investors in the Organized Securities Markets, it will meet the requirements set forth in the rules issued by CVM, in particular Resolution CVM 35 and Resolution CVM 50, and in the rules edited by B3;
- Allowing new operations with inactive Customers only by updating their respective records;
- Continuous adoption of rules, procedures and internal controls aimed at validating and verifying registration information, maintaining updated records, identifying the final beneficiaries of operations, which are proportional to the risk of using their products and services and distribution channels, in accordance with legislation applicable to the product and the market in which it operates, in order to prevent, through it, the improper use of the B3 system by third parties, as well as curb crimes of money laundering, financing of terrorism and / or fraud;
- Identification of politically exposed people (PEP) and adoption of stricter supervision procedures for relationships and operations involving these people, with special attention to proposals for starting relationships, and the maintenance of rules, procedures and internal controls to identify Customers who made such people after the beginning of the relationship as SMBCB, always in compliance with the legislation applicable to the product and the market in which it operates; and
- Maintenance of the information contained in the Customers' records, with the respective documents, including those that are not mandatory to be included in the B3 system and, for eventual presentation to B3, the CVM, or the Judiciary.

### III. Orders for contracting and registering Derivative Operations

SMBCB is not a Trading Participant (PNP) or Trading Participant (PN).

The activity of SMBCB that currently fits as intermediation of securities is only the registration, in an organized over-the-counter market managed by B3, of derivative transactions previously agreed and bilaterally adjusted in an unorganized counter between SMBCB and its clients ("**Derivative Transactions**" or "**Derivative Transaction**").

In order to carry out OTC Derivative Transactions, adjusted with its Customers in the primary market, it is not necessary for SMBCB to observe the provisions of articles 20 and 21, CVM Instruction 505/11<sup>1</sup>, pursuant to CVM Administrative Procedure SP2012/0139, judged at the CVM's Collegiate Meeting held on January 29, 2013. Currently, such provisions correspond to the current articles 20 and 21 of the current CVM Resolution 35, and the understanding of the inapplicability of compliance with such requirements to the SMBCB is ratified in these terms.

The forms of contracting and other operational procedures related to OTC Derivative Operations are found in the derivative contract entered between the Client and SMBCB, prior to the adjustment of any Derivative Transaction in the OTC Market.

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<sup>1</sup> The CVM Instruction 505/11 was revoked by CVM Resolution 35.

Until this date, SMBCB does not carry out any other securities intermediation activity in organized markets managed by B3 and, therefore, will not at first accept orders that involve, for example, trading on behalf of the Client of securities in the secondary organized over-the-counter fixed income market managed by B3. If this scenario changes, SMBCB will change these Rules and Parameters.

## IV. Confirmations

For OTC Derivative Transactions, SMBCB, under the terms of the derivative contract signed with the Client, will keep the trading notes, confirmations and/or similar documents related to the business on file for the purpose of supplying the registration and filing of Orders provided for in article 13 of CVM Instruction 505/11<sup>2</sup>, correspondendo ao atual artigo 13 da vigente Resolução CVM 35, under the terms of CVM Administrative Procedure SP2012/0139, judged CVM Collegiate Meeting held on January 29, 2013, which will be made available to B3 and/or to the CVM, whenever requested. The documents must be kept by the SMBCB for a minimum period of 5 (five) years from the date of settlement of the operation, or for a longer period by express determination of CVM, Central Bank of Brazil (“BCB”) or B3.

## V. Persons Authorized to Contract Over-the-Counter Derivative Transactions

After the Client and SMBCB agree with the terms and conditions of OTC Derivative Transactions, in the form of the derivative contract, the Client will be responsible for signing the Confirmation presented by SMBCB, according to the contractual adjustment. Representatives duly authorized under the law, such as executive officers or grantees, must do the signing of the Confirmation. The Client undertakes to present the respective instruments that prove the powers of the signatories of the Confirmation to the SMBCB (eg: bylaws, articles of association, corporate acts, power of attorney, or equivalent document that officializes such powers, duly filed with the competent registry, as the case may be), which will be filed with the Client's registration dossier. The Client must also inform the SMBCB about the possible change in its staff of agents or directors, within 10 (ten) consecutive days from the event, and the SMBCB may consider such persons as legal representatives, until it is differently informed by the Client.

### V.A. Transactions on Behalf or Benefit or Third Parties

Because of the global policies of the SMBC Group, the conditions set out below will apply to any operation carried out by Customers with SMBCB, including OTC Derivative Transactions. When contracting an Operation with SMBCB, the counterparty of the OTC Derivative Operation understands, consents, and agrees to observe the terms and conditions below.

SMBCB may trade with its counterparty in transactions in its business segment called treasury businesses, including, but not limited to, OTC Derivative Operations and / or foreign exchange operations (jointly, “**Transactions**”). The terms and conditions below apply to all these Transactions between the counterparty and the SMBCB.

Bearing in mind that the SMBCB has contracted or may contract one or more Transactions with a counterparty, the counterparty undertakes and guarantees that it is negotiating, executing and

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<sup>2</sup> The CVM Instruction 505/11 was revoked by CVM Resolution 35.

transacting in its own name and in its own interest, unless the counterparty has expressly communicated to SMBCB, prior to any negotiation of a Transaction, which is acting on its own behalf, as a proxy, broker, asset manager of third parties, or otherwise on behalf of, or for the benefit of another person, as permitted by law and Brazilian standards.

If the counterparty is trading, executing, or transacting any Transaction as a legal representative or, on behalf of or for the benefit of another person, or investment fund, then, in doing so, such counterparty:

- (i) Communicate this clearly to the SMBCB before any negotiation of an Operation is carried out;
- (ii) As requested by SMBCB, it will provide the respective documents, authorizations granted by a third party, or agreements between the counterparty and the third party, at the discretion of SMBCB, as evidence and / or proof of being duly empowered to act on behalf of the third party before SMBCB, as necessary for SMBCB to comply with the internal rules and policies to which it is subject; and
- (iii) Indicate whether it is expressly authorized by the third party or is acting within the limits and in accordance with the powers granted to the counterparty by the third party, or by law, contract or standard, in accordance with the Brazilian Civil Code and the regulations issued by BCB and CVM, as applicable.

In any deal, or other situation in which the counterparty is a representative, or acts on behalf or for the benefit of any other person, or investment fund, if the counterparty does not disclose that fact and / or identifies that person or investment fund, the SMBCB will treat you as the End Customer of the contract with SMBCB and, for all purposes related to such negotiation or matter (subject to applicable laws and regulations), SMBCB shall not have assumed no contractual, regulatory or other obligations with the third party or fund investment that the counterparty represents. SMBCB may accept as a SMBCB Client the third party that the counterparty represents, in its sole discretion, in accordance with SMBCB's internal policies and applicable regulations.

The provisions contained herein will remain valid, even if the counterparty has disclosed, or may, in the future, disclose to SMBCB that it is acting as a legal representative of a third party, or on behalf of another person or investment fund. SMBCB is not obliged to act in accordance with the instructions of any person who is not a Customer (but will have the right to act in accordance with all instructions given by the Customer). SMBCB's obligations in an Operation will be considered fulfilled when fulfilled, delivered or given to the Client, unless SMBCB is otherwise instructed directly by its grantor, or if any other notification is received by SMBCB stating that its powers to act on behalf of its grantor have been revoked, or have been altered, always within the limits permitted by the rules of regulators and self-regulators and of Brazilian laws.

## **VI. Custody of Securities**

SMBCB holds the requisite authorization to act as a custodian, however, it is currently not engaged in the provision of custodian services to its Customers.

## VII. Rules on Settlement of Operations

The Client undertakes to settle the Transactions and make payments to the SMBCB, with its own resources, by the means that are placed at its disposal, related to the amounts of debts arising from the execution of OTC Derivative Operations, as well as related expenses Operations, under the terms of the agreement between the Client and SMBCB.

Payment of amounts made by SMBCB to the Client must be made by bank transfer, of the same title, under the terms of the agreement between the Client and SMBCB. Transfers made by SMBCB to a non-resident investing Client can be made to the checking account of the non-resident investor's custodian.

## VIII. Related People

Pursuant to CVM Process SP2012/0139, judged at the CVM Collegiate meeting held on January 29, 2013, the concept of related persons, and therefore, Article 25 of CVM Instruction 505/11<sup>3</sup>, corresponding to the current article 25 of the current CVM Resolution 35, does not apply to OTC Derivatives.

## IX. Rules on Conduct and Conflict of Interest

SMBCB is committed to conducting its OTC Derivative Operations with the highest ethical principles and standards, among which they stand out, but are not limited to:

- probity, good faith, diligence and loyalty to its customers, in line with its Code of Conduct;
- zeal for the integrity and regular functioning of the market, including regarding the selection of customers and the requirement for guarantees;
- diligence in controlling Clients' positions, with periodic reconciliation between: a) Trading notes and / or documents that supply the registration of Orders; b) positions in the database that generates statements and statements of transactions provided to Customers; and c) positions provided by B3;
- adoption of measures to avoid carrying out operations in a situation of conflict of interest and ensuring equal treatment to its Clients;
- supply its Customers, in a timely manner, with the documentation of the deals made;
- communication to the CVM, whenever it verifies the occurrence or evidence of violation of the legislation that is incumbent upon the CVM to inspect, within a maximum period of 5 (five) working days of the occurrence or identification of the event, without prejudice to the communication to the managing entities of the markets organized in that is authorized to operate, or to the self-regulatory entity, keeping a record of the identified evidence;
- to supply its Customers with information about the products offered and their risk profiles, as well as documents related to the deals carried out, in the form and terms established in its internal rules;
- continuously monitor over-the-counter derivative transactions traded by the SMBCB, to identify those that aim to provide an undue advantage to one of the parties, or to cause damage to third parties, or to the securities market, according to specific regulation; and
- when applicable, keep track of the identification of people who have access to your digital communication channels.

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<sup>3</sup> The CVM Instruction 505/11 was revoked by CVM Resolution 35.

SMBCB has rules, procedures, and internal controls to prevent the interests of Clients from being harmed as a result of conflicts of interest, ensuring equal treatment to Clients.

SMBCB's internal guidelines include but are not limited to: a) identification and assessment of conflicts of interest that may arise between SMBCB and Clients, or between Clients; b) independence in conducting business on behalf of the Client in situations of conflict of interest; and c) communication to the Client when acting in conflict of interest, as well as the sources of that conflict, before confirming an operation.

## **X. Recording system and Retrieval of Information**

For Over-the-Counter Derivative Transactions, SMBCB makes an intelligible recording of all dialogues held with the counterparty, by telephone or similar device, and all exchanges of written messages received by instant messaging system, under the terms of the contract derivative agreement signed with the Client. The content of these recordings can be used as evidence to clarify issues related to the Derivative Transactions adjusted with the Client and must also be kept by the SMBCB for a minimum period of 5 (five) years from the date of settlement of the operation, or for a term higher by express determination of CVM, BCB or B3.

## **XI. Preventing and Combating Money Laundering and Financing of Terrorism**

SMBCB informs that it has internal controls to prevent and combat Money Laundering and Terrorism Financing over its operations and that of its Clients, conducted within the scope of B3, including at least the implementation of the following controls.

### **XI.A. Registration and Monitoring of Operations Involving Securities, independently of its value**

The monitoring of operations established based on specific criteria, to verify compatibility with the Client's financial and equity situation, informed in the Client's register, analysis of the operations together with other related operations and which may be part of the same group of operations or keep any type of relationship with each other, for the purpose of identifying operations that may constitute a crime of money laundering and financing of terrorism, establishing special monitoring rules for Clients on a risk-based approach, according to legislation applicable to the product and the market in which they operate, in order to avoid the misuse of the information system. B3 by third parties not registered, or identified, or for the practice of illicit acts.

### **XI.B. Conservation of Customer registrations and operations records performed by them, holding them at disposal of B3 and CVM**

SMBCB keeps the records of Clients and the records of the operations carried out by them, keeping them at the disposal of B3 and CVM, as well as maintaining the documentation that proves the adoption of the procedures for monitoring the operations and checking compatibility between the capacity economic-financial relationship with the operations carried out by him, and also of the records

of the conclusions of his analyzes about the operations or proposals, for a minimum period of 10 (ten) years, counting from the first day of the year following the end of the closing of the Client's relationship with SMBCB, or the first day of the year following the conclusion of the last transaction carried out on behalf of the respective Client (whichever is the last), this term may be extended indefinitely, in the event of the existence of a formally communicated investigation by CVM to SMBCB.

### **XI.C. Notice to COAF**

Communication, to COAF, of OTC Derivative Operations that may constitute evidence of money laundering and terrorist financing, as determined by Law 9,613, as of March 3, 1998, as amended, as well as regulations of the CVM and other supervisory bodies, self-regulation as well as B3, including, but not limited to, the rules of CVM Resolution 50.

### **XI.D. Internal Control Procedures Manuals**

SMBCB keeps its Internal Control Procedures Manuals duly updated to ensure compliance with the obligations related to the registration of Clients, records of operations, payments and receipt of amounts, rules of conduct, maintenance of files, monitoring and preventive identification of risks of practice of money laundering crimes, selection of suitable employees, partners and service providers, as well as reporting suspicious transactions to the authorities, in accordance with legislation applicable to the product and the market in which it operates, aiming at preventing money laundering and financing crimes. to terrorism.

### **XI.E. Continuous Training**

SMBCB promotes a continuous training program aimed at publicizing the procedures of internal controls to prevent money laundering and terrorist financing.

## **XII. Information Security and Business Continuity**

SMBCB clarifies that it has sufficient internal controls for adequate information security and continuity of operations, including the following controls:

- Control of logical access to information and support systems, in order to prevent unauthorized access, distortion, theft, undue alteration, or leakage of information;
- Formal mechanisms to manage access and passwords (networks, systems and databases, including the electronic customer relationship channel);
- Technology security solution to control external access to the internal environment (firewall), which protects information against malicious code (antivirus);
- Periodic testing of information systems for security, and timely correction of identified vulnerabilities;
- Measures that maintain information with the same level of protection at all times of its use with reference to external activities, including remote work;
- Audit trails for critical systems, which allow the identification of source, date, time, responsible user and classification of all queries and maintenance carried out on critical information;

- Preventive measures against the interruption or unscheduled unavailability of information systems, identifying processes and people that may negatively affect the most critical processes and establishing adequate alternative and compensatory controls;
- Record of unavailability of systems, networks, communication channels (including voice recording and instant messaging); and
- Application of workarounds and implementation of a definitive solution, for the purpose of adequate management of incidents and problems.

### **XIII. General Provisions**

Any exception to these Rules and Parameters that is admitted by SMBCB, as long as this exception does not represent a violation of the market standards and rules established by B3 and CVM, should be considered as a mere liberality of SMBCB, not implying in alteration of these Rules and Parameters, nor in obligation or binding by SMBCB.

SMBCB has a structure and policy of internal controls that aim to ensure compliance with the legislation applicable to its activities.

All documents and information related to operations carried out in the markets managed by B3, as well as all correspondence, internal and external, all working papers, reports and opinions related to the exercise of SMBCB functions, whether physical or electronic, as well as the full recordings referred to in this document, will be filed for a minimum period of 5 (five) years, or for a longer period as expressly determined by CVM, BCB or B3.

SMBCB's Rules and Parameters of Operation may be modified or updated at any time by SMBCB, with its Customers being automatically linked to the provisions, terms and conditions of operations that may be established by SMBCB.

### **XIV. Communications Channels**

Below are our main communication channels, available and accessible through our site:

- SAC – Customer Service  
Telephone: 0800-722-0248  
E-mail: [sac@smbcgroup.com.br](mailto:sac@smbcgroup.com.br)
- Ombudsman  
Telephone: 0800-722-2762 (from 10AM to 4PM)  
E-mail: [ouvidoria@smbcgroup.com.br](mailto:ouvidoria@smbcgroup.com.br)
- Speak Up (Whistleblower)  
Telephone: 0800-591-1634  
Online Portal: [EthicsPoint - Sumitomo Mitsui Banking Corporation](#)
- Privacy  
Email: [privacidade@smbcgroup.com.br](mailto:privacidade@smbcgroup.com.br)

## XV. Administration of the Manual

This Manual has been prepared by the Treasury area and approved by the Treasury Department Head, in accordance with the Policy and Related Documents Governance Structure of the SMBC Group.

Creation Date: August 2021

### XV.A. Procedures Metadata

<b>Version:</b>	4.0
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<b>Primary Approver:</b>	SMBCB Directors
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<b>Document Owner:</b>	Head of Treasury Dept. – Pedro Dorlhiac
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### XV.B. Revision History

#### *Revisions*

<b>Version</b>	<b>Date</b>	<b>Description</b>
1.0	August, 2021	<ul style="list-style-type: none"><li>• Document initial Version</li></ul>
2.0	October, 2023	<ul style="list-style-type: none"><li>• Annual review: inclusion of topics on manual administration and communication channels. Update of the applicable regulation.</li></ul>
3.0	February 2025	<ul style="list-style-type: none"><li>• Annual review: inclusion of the Revision History.</li></ul>

4.0	February 2026	<ul style="list-style-type: none"><li>• Annual review.</li><li>• Adjustment to the wording of Section VI – Custody of Securities, to state that the Bank holds the requisite authorization to act as a custodian; however, it is currently not engaged in the provision of custodial services.</li><li>• Inclusion of the Privacy channel. XIV – Communication Channels</li></ul>
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