



ANTI-MONEY LAUNDERING AND COUNTER TERRORISM FINANCING POLICY

Banco Sumitomo Mitsui Brasileiro SA (“SMBCB” or “Bank”) recognizes the importance of Anti-Money Laundering and CounterTerrorism Financing (“AML / CTF”) and, therefore, undertakes every effort to prevent the Bank, its Cayman Islands branch and its employees from being involved and / or assisting clients, third parties, partners and / or other collaborators in activities and transactions that may constitute crimes of money laundering, terrorism financing and other financial crimes, including corruption and bribery.

The AML / CTF Program at SMBCB uses a Risk-Based Approach, and is implemented in line with the policies of the Sumitomo Mitsui Banking Corporation (“SMBC”) and Americas Division (“SMBC AD”), as well as Brazilian regulations of the Central Bank of Brazil and the Securities and Exchange Commission of Brazil and Cayman Islands Monetary Authority (CIMA) regulation, as applicable to the Bank's activities and businesses.

The principles that guide SMBCB's internal policies and procedures were established for internal compliance by employees, as well as acknowledgement and commitment to adherence, as applicable, by its customers, suppliers, outsourced workers and contractors, partners and others throughout the relationship with SMBCB.

The AML / CTF measures implemented at SMBCB include, but are not limited to:

- Robust governance through oversight exercised by the Executive Board and Senior Management at Corporate Governance Committees, including Financial Crime Compliance and Regulatory Compliance.
- Know Your Employee, to promote an adequate knowledge of its employees that starts in the hiring process and continues with the training programs for AML / CTF also reinforced by the SMBCB Ethical Conduct policy.
- Know Your Supplier and Partner, composed of prior and continuous due diligence when hiring services rendered by third parties and / or establishing relationships with third parties, financial institutions and other participants in the financial and capital markets.
- Know Your Client, composed of processes and internal controls for the identification, qualification, continuous due diligence and risk classification of its clients, as well as the individuals and entities related to them, including beneficial owners.
- Enhanced due diligence when dealing with customers identified as Politically Exposed Persons (“PEP”), customers with relevant adverse media, customers located in high-risk foreign countries, Non-Profit Entities, Trusts, correspondent banks, as well as other customers classified as High Risk.
- Controls and procedures for checking names against lists of persons and entities designated to be involved in acts of terrorism or other crimes, in accordance with resolutions and economic sanctions imposed by the United Nations Security Council (“UNSC”), Office of Foreign Assets Control (“OFAC”) Foreign Assets, Japanese Ministry of Foreign Affairs (“MOFA”), United Kingdom, European Union, and other laws and regulations applicable in jurisdictions where SMBC conducts transactions.
- Procedures for monitoring, selecting and analyzing transactions and situations in order to identify and pay special attention to suspicions of money laundering and terrorist financing.
- Internal risk assessment with the purpose of determining the nature and level of the inherent risk, quality and effectiveness of controls that will result in a residual risk of money laundering, terrorism financing and economic sanctions that SMBCB is willing to accept in pursuit of strategic objectives, while maintaining safe and sound business practices, consistent with applicable laws and regulations.



- Periodic review of the AML / CTF program to ensure effectiveness and adherence to the AML / CTF controls and procedures.
- Continuous training to ensure that all employees and outsourced workers are familiar with the obligations and requirements of the AML / CTF Program.
- Procedures aimed at ensuring the registration, analysis and communication to the competent authorities of financial transactions with indications of money laundering, or terrorism financing, as well as of related financial crimes.
- Maintenance of relevant files and records related to the AML / CTF Program, in accordance with applicable laws and regulations.
- Data Governance Framework and Model Risk Management for Financial Crime Compliance Controls and Systems
- Independent internal audit to ensure proper compliance with the AML / CTF Program, in accordance with the laws and regulations in force.

This external version of AML/CTF policy was approved by SMBCB's Board as of February 2026.