

Confidential



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## **Anti-Money Laundering and Terrorism Financing Policies and Procedures**

To whom it may concern.

Banco Santander (Brasil) S/A is a Financial Institution that recognizes the threats and issues involving money laundering and terrorism financing, as well as the effects these practices have on our society and financial market. Due to that fact, the Institution maintains a legal and regulatory compliance program, which seeks the prevention and combat of these illegal activities.

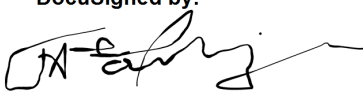
Our institution relies on a series of internal policies, carefully elaborated in conformity with national and international money laundering and terrorism financing legislations, to establish the most effective procedures regarding the prevention and combat of these practices. We have specific set of policies regarding KYC (Know your customer), PEP (Politically Exposed Persons), Private Banking Client, Trade Finance, Correspondent Banking, Sanctions and others.

To effectively apply all policies, procedures and regulations regarding the subject in question, Banco Santander (Brasil) S.A. has established a training program which aims the education and preparation of its employees, so that they should be able to monitor all transactions that are carried out by customers, identify suspicious clients and activities, who should, therefore, report to the authorities. In conclusion, our principles regarding this matter are:

- Always know your clients;
- Always be aware and verify Local and International restricted lists;
- Never do business with "Shell Banks" or Institutions that have any kind of relationship with "Shell Banks";
- Comply with national and international regulations on the matter.
- Monitor financial transactions with the purpose of identifying suspicions activities; and
- Always update internal policies and procedures, as well as provide employees with training to efficiently prevent and combat money laundering and terrorism financing.

Yours Faithfully.

Vanessa Alessi Manzi  
Chief Compliance Officer Brazil

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