



POLICY FOR THE PREVENTION OF MONEY LAUNDERING, TERRORIST FINANCING AND THE
FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

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1 Objective

- 1.1 Domo Venture Capital Gestora De Ativos Financeiros e Valores Mobiliários Ltda. ("DOMO" or "Manager"), committed to the highest professional and ethical standards, has developed this Policy for the Prevention of Money Laundering, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction ("AML/Terrorism Policy" or "Policy") which aims to establish, in addition to the Code of Ethics and the other policies of the Manager, the principles to prevent and identify the use of DOMO as a means for the execution of any form of concealment of the origin of funds from criminal activities of money laundering, also known as "money laundering", and terrorist financing, especially observing the provisions of Law 9,613/98, as amended by Law 12,683/12 and CVM Resolution No. 50/21.
- 1.2 Law No. 9,613/1998 was amended in 2012 to institute measures that confer greater responsibility on economic and financial intermediaries, expressly including third-party asset managers as persons subject to said law.
- 1.3 This Policy observes, among others, the provisions of Law No. 9,613/1998, Law No. 13,260/2016, Law No. 6,385/1976, CVM Resolution No. 21/2021, CVM Resolution No. 50/2021, as well as the COAF rules and ANBIMA Codes applicable to DOMO's activities.

2 Characterization

- 2.1 The crime of money laundering is characterized by economic and financial practices that aim to conceal or hide the illicit origin of certain financial assets or patrimonial assets, so that such assets appear to have a lawful origin or, at least, that the illicit origin is difficult to demonstrate or prove. The process involves, theoretically, three phases or stages: Placement, Concealment and Integration.
- 2.2 The **placement**, the first phase of the process, is the introduction of money into the Financial System, this placement is done in a pulverized way, through deposits, purchase of negotiable instruments or purchase of goods, with the aim of making it difficult to identify the origin of the money.
- 2.3 In **concealment**, the second phase of the process, the amounts are moved electronically, transferred several times, with the aim of making it difficult to track the accounting of illicit funds. In integration, values are definitively introduced into the formal economy.
- 2.4 Considering DOMO's performance exclusively as a manager of Private Equity Investment Funds ("FIP" or "Fund"), the activities to be performed by its Employees in the prevention and monitoring of possible occurrences of money laundering and terrorist financing have a limited scope.
- 2.5 In this way, DOMO acts to prevent suspicious transactions based on the means and information it has at its disposal, including those available from third parties to which it has

access. Thus, within its scope and within the scope of its activities, DOMO monitors the information at its disposal and communicates suspicious transactions to government agencies, even if incomplete, whenever there is an atypical situation.

- 2.6 This Policy shall be interpreted in accordance with DOMO's other manuals and policies, and shall be reviewed annually and kept updated by the Compliance Area, in order to incorporate measures related to new or previously unaddressed activities and risks.
- 2.7 DOMO is committed to providing financial, material and human resources for the implementation of training and to act with transparency in the relationships, transactions and information provided to the market. The Manager fully cooperates with the efforts of government agencies to detect, prevent and combat the crime of money laundering, terrorist financing and other illicit practices.

3 Scope and Adherence

- 3.1 This Policy applies to any DOMO Employee (defined in the Code of Ethics and Conduct) who receives remuneration, whether full-time or part-time, whether through a corporate, labor, contractual or any other relationship with DOMO, including partners, employees, interns, apprentices, contractors, directors and members of corporate boards and committees ("Employees").
- 3.2 Employees must adhere to this Policy, through the electronic acceptance of the Term of Commitment (Annex I), when joining the company or whenever the changes are considered by the Compliance Area as relevant and/or require additional obligations from Employees, and adherence by all is mandatory.

4 Skills and Responsibilities

- 4.1 DOMO adopts the following governance structure for the duties and responsibilities:
- 4.2 Compliance, Risk and AML/CFT Committee ("Committee"):
- 4.3 (i) Approve periodic updates to this Policy;
- 4.4 (ii) Evaluate and deliberate on the effectiveness of internal risk assessment;
- 4.5 (iii) Deliberate in advance on new products, services or technologies from the perspective of AML/CFT;
- 4.6 (iv) Evaluate and deliberate on the Annual AML/CFT Report;
- 4.7 (v) Evaluate and deliberate on potential communication to the competent bodies of suspected or atypical cases submitted to the Compliance and Risk Committee, observing the governance mechanism set forth in item 4.1 below. The Committee will decide on an action plan that may involve the dismissal of an employee, dissolution of the contract with partners, suppliers, partners or investors, divestment of an investee company, and, if applicable, a report to the competent regulatory bodies for additional measures; e
- 4.8 (vi) Recommend sanctions applicable in the event of non-compliance with the rules set forth in the Policy.

4.9 PLDFT Director:

- 4.10 (i) Periodically review this Policy in order to keep it always updated in accordance with the rules in force and in accordance with the activities developed by DOMO;
- 4.11 (ii) Prepare an Annual Report with the internal AML/CFL risk assessment, to report to the Compliance, Risk and AML/CFT Committee;
- 4.12 (iii) Monitor and supervise compliance with this Policy by Employees, as applicable, guiding the actions of the Compliance Area;
- 4.13 (iv) Report to the Compliance, Risk and AML/CFT Committee the complaints and/or suspicions of illicit activities involving AML/CFT;
- 4.14 (v) Report suspicious transactions to COAF, within twenty-four (24) hours of their detection or conclusion as an atypical situation, pursuant to article 22 of CVM Resolution No. 50, keeping a record of all positive communications and individual analyses; e
- 4.15 (vi) If in the calendar year in question no situation is identified that can be reported to COAF, carry out the annual negative report, keeping a record of negative communications, under the terms of item 11 below.
- 4.16 The AML/CFT Director must always count on the necessary technical support – legal advice and compliance consulting from experts – in compliance and periodic monitoring of adherence to current standards.

4.17 Compliance Area:

- 4.18 (i) Continuously assess the compliance of the rules, procedures and controls for the prevention of AML with the legislation and regulations in force;
- 4.19 (ii) Work on the preparation of the Annual Report with the internal risk assessment of JLFT, for reporting in the manner defined above;
- 4.20 (iii) Monitor and supervise compliance with this Policy, carrying out periodic adherence tests, which will be provided for in internal procedures or systems, subject to verification, and must keep the evidence of such tests recorded for a period of five (5) years;
- 4.21 (iv) Inform the AML/CFT Officer of suspicions that come to his attention to the AML/CFT Director and, if involving him or part of the Compliance Area, directly to the attention of the Executive Committee;
- 4.22 (v) Prepare analysis dossiers on suspicious LDFT transactions;
- 4.23 (vi) Ensure that, annually, training and recycling is carried out for Employees and Relevant Third Parties, on the AML/CFT theme, observing the provisions of item 12 below;
- 4.24 (vii) Analyze the legal and regulatory requirements of AML/CFT and their respective impacts on the Manager's business;
- 4.25 (viii) Assist managers in preparing action plans for the implementation of AML/CFT controls; e
- 4.26 (ix) Support the necessary measures to deal with occurrences of suspicious transactions or transactions, from a legal perspective.

4.27 All Employees:

- 4.28 (i) Know and follow the guidelines of this Policy, including participating in the training actions made available by the Compliance Area;

- 4.29 (ii) Timely report any situation, operation or proposal suspected of involvement in any unlawful act to the AML/CFT Officer, who will make a prior analysis of each situation and take the cases to the Compliance, Risk and AML/CFT Committee and/or the Executive Committee, depending on the severity and related matter. Alternatively, Employees may use DOMO's Whistleblowing Channel for such reports, as provided for in item 15 below; e
- 4.30 (iii) Refrain from suggesting, offering, demanding, promising or knowing, directly or indirectly, undue advantages of any nature to people and companies from different countries in exchange for performing or omitting acts that do not suit their attributions, operations or activities of DOMO.
- 4.31 DOMO is also responsible for adopting diligence in the selection and monitoring of relevant third parties for AML/CFT purposes, including fiduciary administrators, distributors, placement agents, consultants and partners, assessing their ability to comply with applicable standards and its own prevention programs.

5 Governance Mechanisms for Conflicts of Interest

- 5.1 The members of the Executive Committee and the Compliance, Risk and AML/CFT Committee are prevented from voting in the event of potential conflicts of interest, and whenever it involves potential situations of customers, counterparties, target or investee companies, or even Employees related to their respective area, or to themselves, in which case the deliberation of the matter will be the responsibility of the other members of the Executive Committee and the Compliance Committee. Risk and AML/CFT. Also, in the event of a tie in votes of the Executive Committee and/or the Compliance, Risk and AML/CFT Committee, regarding AML/CFT matters, the AML/CFT Director will have the tie-breaking vote.

6 Guidelines for Risk Treatment and Mitigation

- 6.1 The management of LDFT risks is based on internal risk assessment parameters, according to the following assumptions and guidelines:
- 6.2 (i) The AML/CFT Officer shall have unrestricted and timely access to all information related to the management of AML/CFT risk, and any restriction on the information is prohibited, even if under the allegation of confidentiality, data protection or *chinese wall*;
- 6.3 (ii) Those responsible for the risk management activities of the LDFT must base their analysis on all the information they deem relevant, including, where appropriate, that which is restricted or even confidential obtained through internal mechanisms, or from the Whistleblowing Channel;
- 6.4 (iii) In the event of vacancy of the position of AML/CFT Officer for a period of more than thirty (30) days, the CVM shall be notified of his/her replacement within seven (7) days; e
- 6.5 (iv) All suspicious LDFT transactions must give rise to an analysis dossier to be submitted to the Compliance, Risk and AML/CFT Committee, registered internally and maintained for a period of no less than five (5) years.

7 Risk Classification

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- 7.1 DOMO will classify investors, counterparties and partners according to their level of AML risk (low, medium, high), considering, among other factors, jurisdiction, corporate structure, final beneficiary, economic activity, exposure to Politically Exposed Persons ("PEPs"), reputational history and nature of the operations, and the controls and level of diligence must be proportional to the classification assigned.

8 Know Your Client – KYC Procedures

- 8.1 Considering that DOMO does not distribute shares of investment funds managed by it, the activity of "Know Your Client" or "Know Your Client – KYC" is mostly the responsibility of the FIP Distributor and the institutions hired to distribute the Funds' shares;
- 8.2 For Funds traded in an organized market, it is the intermediary institution that carries out the trading on behalf of the client; for Funds distributed on behalf of the Distributor, it is the Distributor who identifies the customer, however, the Distributor must be approved by the FIP Administrator.
- 8.3 However, whenever there is a new registration and, for cases of low-risk renewal every 5 years, DOMO's Compliance Area will carry out *due diligence* procedures with the Distributors and Fiduciary Administrators of these Funds to verify the adequacy of their processes. In this case, the Compliance area will use the due diligence questionnaire that constitutes Annex II to this Policy.
- 8.4 If any relationship with politically exposed persons (PEPs) is identified, as well as their representatives, family members and close relationships, it will imply the adoption of reinforced diligence, approval by Managers, continuous monitoring and periodic updating of registration information.

9 Exclusive Backgrounds

- 9.1 DOMO does not currently operate with Exclusive Funds, but may offer exclusive, non-discretionary fund management services in the future.
- 9.2 In this case, in accordance with Circular Letter No. 4/2020-CVM/SMI-SIN, DOMO will adopt its own initial *due diligence* procedure for KYC purposes before its acceptance, according to the procedure described below, as well as its operations will be continuously monitored by the Compliance Area.
- 9.3 The Compliance Area must carry out a search, at least, on the websites indicated below, in order to identify any impediments to receiving applications from the clients in question:
- 9.4 Google (www.google.com.br);
- 9.5 OFAC List (<http://www.instantofac.com/>); and
- 9.6 Federal Revenue Service (www.receita.fazenda.gov.br).

- 9.7 The information collected in this process must cover the natural persons authorized to represent the clients, all their direct and indirect controllers, and the natural persons who have significant influence over them, until reaching the respective final beneficiaries.
- 9.8 For the purposes of defining control and significant influence of the final beneficiary, a minimum participation of 25% (twenty-five percent) in the company's capital stock is considered.
- 9.9 The AML/CFT Director must be consulted in advance and carry out his checks on the potential customer under analysis.
- 9.10 In the case of clients considered to be at high risk, DOMO will seek information on the origin of funds that will be invested in the Manager and their compatibility with the assets declared by the client in its registration, and may resort to the exchange of information with other service providers of the respective exclusive fund. To do so, you may request the last income tax return, requesting an alternative or additionally any other documents you deem necessary.
- 9.11 In addition, the Compliance Area may determine that, in the event of investments by High-Risk customers as indicated by any Distributor or defined by DOMO after internal analyses (such as PEPs and non-resident investors, especially those constituted in the form of *a trust* or with bearer shares), the procedures below may be observed and further information may be requested from the customer or the Distributor. and DOMO is guaranteed the right of refusal of such customer.
- 9.12 However, DOMO has the following rules:
- 9.13 - Not accept the management of portfolios or funds exclusive to PEPs, or any investment vehicle in the form of bearer shares; e
- 9.14 - Not accepting the management of portfolios or exclusive funds of people or groups whose source of capital is not explained, and compatible with the group's formal records (Audited Balance Sheets; IRPJ; IRPF; others).
- 9.15 The registration update of active customers must occur in periods not exceeding sixty (60) months from their registration or the last registration update, according to their risk classification shown in the following table, under penalty of not being admitted

CONTROL ACTIVITY	CRITERIA		
	Low Risk	Medium Risk	High Risk
Periodicity of Restrictive Consultations (<i>Background check</i>)	24 months	12 months	12 months
Authority of Approval of customers	AML/CFT Director	Compliance, Risk and AML Committee	Compliance, Risk and AML Committee

Cadastral Update and Document Collection *	60 months	36 months	24 months
KYC Interview and Assessment Environments	Remote (Electronic Channels)	Remote (Personal Online)	On-site face-to-face
Transaction monitoring	Periodical	Periodical	Ongoing

9.16 *When the control of registration update involves another participant/distributor, if there is a divergence, the shortest defined update period must be accepted.

9.17 The evidence of verification of the KYC provided for in this item, as well as the analysis for the customer's risk classification, will be recorded in the KYC Report, under the responsibility of the AML/CFT Officer.

10 Know Your Counterparty Procedures

10.1 In the assets of FIPs, DOMO's Compliance area is responsible for conducting due diligence on the target companies and, as the case may be, on the controlling shareholders of the target companies ("Counterparties") before submitting for approval by the Internal Investment Committees.

10.2 To this end, DOMO has established a Counterparty identification process appropriate to the characteristics and specificities of the FIPs' investments, and the main focus of attention of DOMO's anti-money laundering and anti-money laundering activities will be the monitoring of (i) investment and divestment transactions by the Funds and by the Funds' investees and (ii) the counterparties of these operations.

10.3 Legal due diligence must be carried out by specialized teams, which can be outsourced to specialized law firms and must include, in addition to the legal audit, an anti-corruption audit and *background check* of partners and directors. In addition, the Compliance Area must be involved to analyze the results obtained by third parties and, if necessary, carry out complementary procedures.

10.4 The notes identified in the due diligence report are reported to the FIP's Internal Investment Committee, which takes into account the results to execute or not the investment, and/or structure an action plan to address issues arising from the due diligence.

10.5 Among the Manager's *background check* procedures , the Compliance Area must verify, before and periodically after the investment, according to the periodicity described above applicable to each risk scenario, whether (i) the investee company, final beneficiaries or directors are included in trading restriction lists such as the *World Bank Group Listing of Ineligible Firms and Individuals*, *The Financial Conduct Authority* (FCA UK) and other internationally recognized sanctions lists such as the UN and OFAC; (ii) any of these individuals is a politically exposed person (PPE), under the terms of Annex A of Resolution No. 50/21; and (iii) there is public information that casts suspicion on the suitability of these individuals, and that, consequently, requires the deepening of the analysis of a certain person.

- 10.6 If the target company, its final beneficiaries or directors are on the sanctions list, the Manager is obliged, if and only decides to proceed with the investment, to condition the investment to removal from the list and to action plans to mitigate the future listing.
- 10.7 This is because DOMO prohibits the execution of any transaction, within the scope of the Manager and its investee companies, involving countries mentioned in the OFAC list, cited as high risk or non-cooperative. It is also forbidden to practice such actions with individuals or legal entities mentioned in the list prepared by OFAC, which includes sanctions imposed by countries such as Switzerland, the United Kingdom and the United States, as well as multinational organizations such as the European Union and the UN.
- 10.8 Whenever applicable, among other verifications, the lists from the UNSC and the Judiciary must be verified for investment in an asset or in its periodic evaluations, in order to support the decision on the execution of the investment or its maintenance.
- 10.9 In companies already invested, if illegal practices are identified or the company becomes part of any sanction list, the Manager will require immediate actions that may include, without limitation, the accountability of the directors of the invested company, with suspension of the executive and communication to the competent bodies; application of the provisions of the shareholders' agreement; recommendation for the FIP to sell the interest or acquire the interest of the other party in the invested company.
- 10.10 All asset identification procedures and *background checks* of the final beneficiaries described in this item will also be conducted in the event of co-investment, corporate reorganization, merger, spin-off and/or incorporation of the investee companies of the FIPs under DOMO management, as well as at the time of divestment. In this case, all Counterparties involved in the respective operations will be subject to the diligence of the Compliance Area and/or a report produced by contracted third parties.
- 10.11 Transactions in which the Counterparties are persons falling into the categories of politically exposed person (PEP), non-profit organization and parties related to DOMO will be monitored with special attention and classified as high risk. For these cases, the fundamentals and motivations of the business must be evaluated in more depth, observing, among other aspects, the form of payment and the duration of the negotiations.
- 10.12 Particular attention should also be paid to transactions where it is not possible to identify the final beneficiaries. In this case, they can only be carried out after approval by the Executive Committee and/or the Risk, Compliance and AML/CFT Committee.
- 10.13 The results of the diligences, whether carried out by the Compliance Area or by third parties, must be forwarded to the AML/CFT Officer and the DOMO Management Area for a risk-based analysis of the respective Counterparty, according to the criteria below:

LDFT RISK LEVEL	COUNTERPARTY
HIGH	* PEP, NGO, related parties

LDFT RISK LEVEL	COUNTERPARTY
	* Evidence of concealment of the final beneficiary
MEDIUM	* <i>Red flags</i> pointed out in <i>Counterparties' due diligence</i> processes related to LDFT.
LOW	* Full identification of final beneficiaries
	* No notes in the <i>due diligence processes</i> of the Counterparties

10.14 Transactions classified as medium and high risk must have the prior approval of the Compliance, Risk and AML/CFT Committee.

10.15 Cases classified as high risk must be reported to the Executive Committee and the Compliance, Risk and AML/CFT Committee. In such cases, the Manager should ensure that further investigation is carried out, requesting additional information from those involved that may not be publicly available. The decision to carry out such deepening may come from any instances of the Manager or the FIP's Internal Investment Committee.

10.16 Within the scope of the governance of investee companies, whenever DOMO effectively holds an equity interest, and from the moment that regulations may require, the Management Area is responsible for ensuring that investee companies implement minimum procedures required by DOMO in the prevention of money laundering and combating the financing of terrorism and corruption. Among the required standards, we can mention: (i) the appointment of a compliance officer; (ii) the adoption of a Code of Conduct, Anti-Corruption and Anti-Money Laundering Policy; (iii) establishment of a whistleblowing channel; (iv) *background check* procedure for hiring service providers and suppliers; (v) employee training; (vi) standard clauses in contracts with third parties providing for the non-tolerance of unlawful practices and the possibility of termination of the contract in case of unlawfulness by the other party; (vii) procedures for identifying assets and final beneficiaries in M&A transactions; and (viii) *background check* procedures for hiring employees.

11 Counterparty Registration Procedure

11.1 The registration of Counterparties with whom the Manager does business shall be standardized by the completion by the respective Counterparty of the form that constitutes Annex II to this Policy. The Compliance Area, at its sole discretion, may waive the completion of certain items of the referred form. The documents related to the Counterparty's registration must be filed for a minimum period of five (5) years.

- 11.2 The assets and securities listed below, depending on their Counterparty and the market in which they are traded, have already gone through the Money Laundering prevention process, thus exempting DOMO from additional diligence in relation to the control of the Counterparty, namely:
- 11.3 Initial and secondary public offerings of securities, registered in accordance with the rules issued by the CVM;
- 11.4 Public offerings of restricted efforts, exempt from registration in accordance with the rules issued by the CVM;
- 11.5 Assets and securities admitted to trading on stock, commodity and futures exchanges, or registered in a registration, custody or financial settlement system, duly authorized in their countries of origin and supervised by a recognized local authority;
- 11.6 Assets and securities whose Counterparty is a financial institution or similar; e
- 11.7 Assets and securities of the same economic nature as those listed above, when traded abroad, provided that (a) they are admitted to trading on stock, commodity and futures exchanges, or registered in a registration, custody or financial settlement system, duly authorized in their countries of origin and supervised by a local authority recognized by the CVM, or (b) whose existence has been ensured by third parties duly authorized to carry out custody activity in countries that are signatories to the Treaty of Asunción or in other jurisdictions, or supervised by a local authority recognized by the CVM.

12 Private Credit, Over-the-Counter Operations and Private Distribution

- 12.1 Discretionary Funds do not have a policy of investing in over-the-counter derivatives, nor do they invest substantially in financial assets considered to be Private Credit, which is why the risk for Money Laundering prevention purposes is considered low. Likewise, DOMO does not have a policy of acquiring assets through private distribution (fixed income or stocks), nor credit rights and real estate developments.
- 12.2 In exclusive funds, if they are accepted, DOMO will establish the following basic criteria to obtain comfort in relation to the investment in Private Credit: (i) Known and proven source of funds; and (ii) use of capital and credit analysis compatible with the investor's profile and the Fund's regulations. Even so, any suspicion of inappropriate use of the Fund is subject to further diligence, and veto to the intended operation.
- 12.3 Some Funds may acquire, as part of their strategy, debentures and *bonds* in the organized over-the-counter market. In addition, the Funds may apply, within the scope of their cash management policy, in third-party funds with automatic zeroing.
- 12.4 In this case, and whenever possible to determine the counterparty of a transaction, DOMO shall adopt a counterparty identification process as per item 6, as well as monitor any direction of gains or losses, or the existence of other indications of Money Laundering, including verifying, when applicable, whether the counterparty has minimum mechanisms for such analysis.

13 Know Your Supplier (KYS) Process

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- 13.1 It is a set of rules, procedures, and controls that must be adopted to identify and accept suppliers and service providers, preventing the hiring of disreputable companies or companies suspected of involvement in illegal activities.
 - 13.2 DOMO adopts procedures proportional to the risks of each partner, which includes:
 - 13.3 Background *check* and use of Risk-Based Supervision (SBR), as detailed in the Policy for Selection, Hiring and Supervision of Service Providers for Investment Funds under Management of DOMO.
 - 13.4 Inclusion, when applicable, of a corruption prevention clause in contracts with third parties.
 - 13.5 Rules and criteria for accepting and offering courtesies, gifts and hospitality in accordance with DOMO's Code of Ethics and Conduct.
 - 13.6 DOMO classifies as Relevant New Third Parties, that is, the new strategic partners, suppliers and service providers that participate in a relevant way in the operational processes, such as Fiduciary Administrators of the Funds, Distributors of Fund quotas, specialized law firms, among others defined by the Compliance, Risk and AML/CFT Committee.
 - 13.7 DOMO classifies as Relevant Third Parties the strategic partners, suppliers and service providers that already participate in a relevant manner in the operational processes, such as Fiduciary Administrators of the Funds, Distributors of Fund quotas, specialized law firms, among others defined by the Compliance, Risk and AML/CFT Committee.
 - 13.8 The contracting with Relevant New Third Parties will take place after a *due diligence process*, through which the adoption by the third party of the customer identification and monitoring steps required by the regulations in force is certified, in which the following are considered, for example:
 - 13.9 Registration documentation, obtaining all the data required by the regulations and kept by the third party for the minimum regulatory period;
 - 13.10 Consultations of the respective final beneficiaries on the restrictive lists, in particular, but not limited to the following: negative media, PEP, OFAC - *Office of Foreign Assets Control*, UN Security Council;
 - 13.11 Blocking process and timely communication to the competent bodies regarding assets and rights of clients that are unavailable by orders of the UN Security Council or by court orders;
 - 13.12 Contracts with Relevant Third Parties must provide for the prompt exchange of information inherent to their transactions, periodically and whenever necessary, as well as the verification of compliance with regulatory demands, on an occasional or periodic basis.

14 Risk-Based Monitoring of Service Providers

Minimum periodicities for reviews by the Relevant Third Parties:			
Control Activities	Low risk (36	Medium risk (24	High risk (12 months)

	months)	months)	
Due diligence questionnaires	x	x	x
Contract review (minimum clauses)	x	x	x
<i>Background search</i>		x	x
Compliance Assessment	x	x	x
Interviews		x	x

- 14.1 Notwithstanding the periodicity defined above, if there are new facts related to the business or person of the third party, such as changes in the scope of the initial contract, at the discretion of the Compliance Area, a reassessment of the third party must be conducted, due to such facts, even before the periodicity mentioned herein.
- 14.2 If there are significant changes in the conditions provided for in the *due diligence* process, they may have their contract terminated, as decided by the Compliance, Risk and AML/CFT Committees. The Compliance Area must formalize it in its own report, for subsequent forwarding to DOMO's management bodies or, in the event of identification of any non-compliance, to take the necessary measures.
- 14.3 The identification of atypical or suspicious situations must be recorded, analyzed by the AML/CFT area and, when relevant, escalated to the AML/CFT Director and the Risk and Compliance Committee for deliberation on the appropriate measures, including communication to the competent bodies.

15 Know Your Employee (KYE) Process

- 15.1 It is a set of rules, procedures and controls that must be adopted for selection (*background checks*) in order to avoid links with people involved in illegal acts.
- 15.2 Before any hiring is effective, the Compliance Area must carry out a *background check*, and after hiring carry out monitoring through an external system, following the procedures detailed in the Employee Hiring and Certification Policy, always respecting all existing labor and corporate rules and laws.
- 15.3 DOMO has the prerogative to request from any of its Employees, upon their admission or periodically, proof of income and assets, for the purposes of monitoring and preventing AML/CFT, within the scope of the Know Your Employee – KYE process.
- 15.4 If behavior apparently incompatible with the Employee's economic and financial situation is identified, through complaints or media monitoring, the Employee may be asked to provide clarifications and present respective evidence, at the discretion of the Compliance Officer, who also performs the function of AML/CFT Officer.
- 15.5 It is expressly forbidden for an Employee to negotiate the products offered by DOMO.

16 Risk-Based Approach to Products

- 16.1 DOMO operates exclusively in the management of resources from portfolios of private equity investment funds (FIPs), whose distribution is carried out by Relevant Third Parties (Fund Distributors), with the quotaholders of the FIPs managed by DOMO having the necessary qualification, as required by regulation.
- 16.2 The LDFT risk level of the product that the Manager has (FIPs) is classified as low, given that: (i) the *timing* of the Investment Transaction enables us to carry out the *Due Diligence* process in all first investments in *startups*; (ii) there is no Investment Transaction without contracts with strong Representations and Warranties, and Indemnification clauses; (iii) the Venture Capital market demands a relevant level of training and reputation, so the Startups that arrive at DOMO usually already have the risk of Placement partially mitigated; (iv) DOMO, as Manager, does not directly make, or directly request, any payments or transfers, which are checked and executed only by the Fund Administrators.

17 Evaluation of New Products, Services and Technologies

- 17.1 New products, services and technologies contracted or developed internally must be previously evaluated from the perspective of AML/CFT in the Compliance, Risk and AML/CFT Committee. There is governance focused on risk management for the evaluation and approval of new businesses, observing the applicable rules and regulations and the best market practices.

18 Reporting Suspicious Transactions

- 18.1 Transactions or proposals that contain indications of money laundering or terrorist financing must be reported to the competent regulatory bodies in the jurisdiction of the occurrence. In the case of Brazil, DOMO has up to twenty-four (24) hours from the conclusion of the analysis by the Compliance, Risk and AML/CFT Committee to report the suspicion to COAF, in compliance with legal and regulatory determinations. That communication shall contain at least the following information:
- 18.2 the date of the beginning of DOMO's relationship with the plaintiff or person involved in the operation or situation;
- 18.3 the reasoned explanation of the warning signs identified;
- 18.4 the description and detailing of the characteristics of the operations carried out;
- 18.5 the presentation of information obtained through the diligences that qualify those involved, including informing whether or not they are politically exposed persons, and that detail the behavior of the person communicated; e
- 18.6 the conclusion of the analysis, including the reasoned report that characterizes the warning signs identified as a suspicious situation to be communicated to COAF.
- 18.7 The Financial Activities Control Council ("COAF") is the government body responsible for monitoring, disciplining, applying administrative penalties, receiving, examining and identifying suspicious occurrences of illicit activities related to money laundering.

18.8 The situations listed below may constitute evidence of the occurrence of the crimes provided for in Law No. 9,613/98, or may be related to them, and must be analyzed with special attention and, upon detection and explicit justification, under the terms of articles 20, 21 and 22 of CVM Resolution No. 50/21, communicated to COAF, indicating classification with the following groups of atypicalities:

GROUPS	ATYPICAL SITUATIONS
Customer or Counterparty Identification Process	Impossibility or inconsistencies in the identification of the final beneficiary.
Transactions carried out in the securities market	Continuous gain or loss on transactions involving the same parties.
	Significant fluctuation in the business pattern.
	Artifice to circumvent the identification of the personnel involved and beneficiaries.
	Evidence of acting, in a contumacious manner, on behalf of third parties.
	Sudden and unjustified change in operational modalities.
	Purpose of loss or gain in operations without economic or legal basis.
	Operations carried out outside the market price.
People suspected of involvement in terrorist acts	Assets reached by unavailability sanctions.
	Assets reached by unavailability sanctions from a foreign central authority.
	Business with people with any involvement in terrorist acts.
	Transactions that can be associated with terrorist financing.
Other hypotheses that constitute indications of AML/TF	Unusual events identified in diligences and monitoring that involve high risk of LD/FTP.
	Corporate transactions or transactions of any nature, identified by Independent Auditors.

18.9 All records that supported the communication or the decision not to report a certain suspicious transaction will be digitally archived in DOMO's Google Workspace by the AML/CFT Director and properly maintained, for a minimum period of five (5) years.

18.10 DOMO does not provide its customers or third parties with information about any suspicions and/or communications made as a result of indications of money laundering or terrorist financing to the competent bodies.

18.11 In addition, the Compliance Area must annually declare to COAF, on the last business day of April of each year, the non-occurrence (if this is the case) of suspicious money laundering transactions in the previous year.

18.12 Communications in good faith do not entail civil or administrative liability to the Manager, nor to its managers, employees and partners.

19 Training

19.1 The AML/TF training program is continuous and applied to all of the Manager's Employees, using clear language and addressing the specificities of each function performed.

19.2 The training aims to deepen the knowledge of legal and regulatory requirements and responsibilities, as well as corporate AML/CFT guidelines, such as: to enable to identify, prevent, treat and communicate situations of risk or with indications of the occurrence of money laundering or terrorist financing in the business carried out, exemplify different forms of money laundering involving DOMO's products and services.

19.3 Training is always applied at the entry of every new Employee and periodically a new training for updating and recycling must be required. Employees who have greater contact with potential illegal situations receive continuous training updates, at the discretion of the Compliance Area.

19.4 The training of Relevant Third Parties, as determined by the AML/CFT Director, must: (i) Consider the minimum content to be applied, upon prior evaluation of the Third Parties' own programs, in order to attest to their compliance with the standards adopted by DOMO and requirements of regulators; (ii) Provide for the annual proof of the training applied by the Relevant Third Parties themselves, with evidence of the success rate; (iii) Be applied by DOMO, when any inadequacy or absence of training by the Relevant Third Parties is verified.

20 Effectiveness Indicators

20.1 To ensure the effectiveness of the rules, procedures and controls for the prevention and management of AML/CFT risks, the effectiveness indicators of each relevant process will be evaluated, whenever determined by the AML/CFT Director, as shown in the table below:

ITEM	INDICATORS	MINIMAL GRIP	RESPONSIBLE	CORRECTIVE ACTION
Registration (applicable in cases of Direct Distribution)	Registrations completed within 90 days of the beginning of the Offer, with the completion of	90%	AML/CFT Director	Systemic blocking of the registration of operations with incomplete registration

	diligences			
Registration (applicable in cases of Direct Distribution)	Registrations updated within the expiration date	90%	AML/CFT Director	Automation and anticipation of registration expiration alerts
Asset Monitoring	Atypicalities identified and addressed in a timely manner	N/A	AML/CFT Director	Correction and action plan for atypicalities
Communication to COAF	Number of atypical transactions recorded Vs Number of transactions reported	N/A	AML/CFT Director	Review of the parameterized criteria for the elimination of false positives
Communication to COAF	Average time between the date of registration of the transaction and the date of communication	N/A	AML/CFT Director	Automation of processes and/or review of analysis deadlines
Communication to COAF	Cases reported and analyzed by the Compliance and Risk Committee within ninety (90) days.	N/A	AML/CFT Director	Automation of processes and/or review of analysis deadlines
Communication to COAF	Communications made within 24 hours of the decision to communicate.	N/A	AML/CFT Director	Review of the application process and formalization of cases to be reported
Relevant Third-Party Monitoring	Weaknesses identified and addressed within 12 months	N/A	AML/CFT Director	Action Plan for Weaknesses / Amendment of the Relevant Third Party AML/CFT Policy
Training	Number of participants X number of Employees	100%	AML/CFT Director	Availability of material and test application for absent Employees and registration of the appropriate justifications for absence
Training	Average Score Vs Minimum Grade Required	70%	AML/CFT Director	Punctual training for employees with lower performance

20.2 The AML/CFT Program may be submitted to effectiveness tests by an independent internal or external audit, when applicable, with a view to assessing adherence to standards, the effectiveness of controls and the need for improvements.

- 21.1 Annually, by the last business day of April, the AML/CFT Officer must submit to the Compliance, Risk and AML/CFT Committee the Annual AML/CFT Internal Risk Assessment Report, containing the management of events related to the previous year. Such Report must be available to the CVM and ANBIMA, kept at DOMO for a minimum period of five (5) years, or for a longer period, by express determination of the regulatory and self-regulatory bodies.
- 21.2 Likewise, all other documents and information required under this Policy will be kept for the period provided for in the current regulations, at least five (5) years, or for a longer period, as expressly determined by the regulatory and self-regulatory bodies.
- 21.3 The processing of personal data within the scope of the AML/CFT will comply with Law No. 13,709/2018 (LGPD), ensuring purpose, necessity, information security and confidentiality of the information of Employees, investors and third parties.

22 Whistleblowing Channel

- 22.1 DOMO provides an external Whistleblowing Channel that preserves the anonymity of the whistleblower so that Employees, if they wish, can send complaints related to this Policy. The electronic address of the Whistleblowing Channel is <https://app.compliasset.com/domo-invest-denuncia>
- 22.2 In addition to the AML/CFT topic, suspicions or evidence of corruption must also be reported through this Whistleblowing Channel or directly to the AML/CFT Director, who will report to the Compliance, Risk and AML/CFT Committee.

23 Final Thoughts

- 23.1 All Employees must preserve the confidentiality of information related to violations of the guidelines of this Policy. Anonymous complaints are accepted through the Whistleblowing Channel listed in item 15 above.
- 23.2 Failure to comply with the precepts of this Policy or other related ones may result in appropriate disciplinary or judicial measures, which may lead to dismissal, dismissal or other sanctions, including those arising from applicable law, self-regulation or regulation.
- 23.3 This Policy will be reviewed periodically, at least annually, or whenever there are relevant regulatory or operational changes, and must be approved by the Committee, with a record of acknowledgement by the Employees.

ANNEX I

TERM OF COMMITMENT

By means of this Term, I, _____, registered with the CPF under No. _____, declare for the due purposes that:

1. I have received an updated version of the Policy for the Prevention of Money Laundering, Terrorist Financing and the Financing of the Proliferation of Weapons of Mass Destruction ("Policy") from **DOMO INVEST GESTORA DE ATIVOS FINANCEIROS E VALORES MOBILIÁRIOS LTDA. ("DOMO")**, whose rules were previously explained to me and in relation to which I had the opportunity to clear all existing doubts, having also read and understood all the guidelines established therein, committing myself to fully observe all the provisions contained therein in the performance of my duties.
2. I am absolutely aware of the content of the Policy. I also declare that I am aware that the rules contained in the Policy become part of my duties as a DOMO Employee, incorporating the other rules of conduct adopted by DOMO.
3. As of this date, non-compliance with the Policy may result in the characterization of serious misconduct, a fact that may be subject to the application of the applicable penalties, including dismissal or dismissal for cause.

São Paulo, de de .

**DOMO VENTURE CAPITAL GESTORA DE ATIVOS
FINANCEIROS E VALORES MOBILIÁRIOS LTDA**

COLLABORATOR

ANNEX II

DUE DILIGENCE QUESTIONNAIRE - DOMO PLD.

[NAME OF DIRECTOR/DISTRIBUTOR/COUNTERPARTY/ISSUER]

On behalf of Domo Invest Gestora de Ativos Financeiros e Valores Mobiliários Ltda. ("DOMO"), I hereby forward this document in order to register the information about the internal controls for the prevention of money laundering adopted by the Institution.

We count on the collaboration of Your S.Sas. and we request that the information be true, reliable and complete.

DOMO ensures that all information provided herein will be kept internally and will not be made available to third parties, unless requested by competent public authorities or judicial measures.

From time to time, DOMO may request a review of this questionnaire.

At the end of the questionnaire, please indicate the person responsible for filling it out and, if there is more than one, both must be identified.

Sincerely,

DOMO

1. Registration Information

1.1. - Corporate Name:

1.2. - CNPJ/MF:

1.3. - Address:

1.4. - Main contacts:

Emails:

Telephones:

Cell phones:

1.5. – Registrations with regulatory, self-regulatory bodies and class associations:

1.6. – Do you belong to any financial group? Which one(s)?

2. Information on the controls of the Money Laundering and Terrorist Financing Policy:

2.1. Does the Institution have a Money Laundering and Terrorist Financing Prevention Policy?

☐ Yes. Please attach.

☐ No.

2.2. Does the Institution have a procedure for identifying and registering investors ("Know Your Customer")?

☐ Yes. Please attach.

☐ No.

2.3. Are the controls and procedures for the Prevention of Money Laundering and Terrorist Financing subject to external audit? What is the periodicity?

☐ Yes. Periodicity? _____

☐ No.

2.4. What rules for the Prevention of Money Laundering and Terrorist Financing (legal, regulatory and self-regulatory) are the Institution subject to?

2.5. How many people are allocated to the Prevention of Money Laundering and Terrorist Financing area? Are there control systems?

2.6. Does the Institution, its partners, directors or any other employee have any relationship with people considered politically exposed*?

☐ Yes. Detail:

☐ No.

*Politically exposed persons are considered to be public officials who hold or have performed, in the last five years, in Brazil or in foreign countries, territories and dependencies, positions, jobs or relevant public functions, as well as their representatives, family members and other people in their close relationship.

2.7. Have the Institution, partners or directors ever been accused in the administrative or criminal sphere or convicted of crimes of (i) money laundering, (ii) against assets, or (iii) against the national financial system or for any other crime?

2.7. Please inform the name of the Director responsible for the Anti-Money Laundering and Terrorist Financing Policy.

Date:

Name:

Signature of the person in charge: