



## COMPLIANCE, INTERNAL CONTROLS AND COMPLIANCE WITH CVM RESOLUTION 21/21 POLICY

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**SUMMARY**

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**COMPLIANCE POLICY, INTERNAL CONTROLS AND COMPLIANCE WITH CVM RESOLUTION 21/21****1. Objective**

- 1.1. DOMO's Compliance area is responsible for the preparation and maintenance of the Manager's Compliance Program, which includes the periodic review and updating of Internal Policies, as well as the implementation of internal controls and adherence tests to monitor their effectiveness, as well as training Employees.
- 1.2. The Manager's Compliance Program was developed with a view to complying with the obligations established in CVM Resolution No. 21/21 ("CVM Resolution 21"), in ANBIMA's Self-Regulation Codes to which DOMO adheres, as well as other standards, guidelines and Guidance Letters issued by said bodies, among other national and international best practices.
- 1.3. The Compliance area is primarily responsible for disseminating and supervising the Manager's internal rules, controls and procedures, aiming to mitigate the operational, regulatory, reputational and legal risks of its activity. To this end, the area has the human resources structure and systems defined in this Compliance Policy.
- 1.4. DOMO's Compliance Program is structured based on a risk-oriented approach, prioritizing the identification, assessment, monitoring and mitigation of regulatory, legal, operational, reputational and integrity risks that may affect the Manager's activities.
- 1.5. This Policy aims, therefore, to discipline the performance of the Manager's Compliance area, clarifying its responsibilities and the procedures to be observed when it operates. The other procedures and internal controls to be observed by the other areas of the Manager are outlined in DOMO's Internal Policies, which are available on its *website*.

**2. Director responsible for the Compliance area**

- 2.1. Henrique de Castro Gonçalves Cruz is the director responsible for DOMO's Compliance and AML/CFT area. Pursuant to item IV, of article 4 of CVM Resolution 21, it is the officer responsible for the implementation and compliance with rules, Internal Policies, procedures and internal controls established in said Resolution.
- 2.2. Reporting directly to the Executive Committee, he has full authority over the implementation of DOMO's Compliance Program and is familiar with capital market legislation, regulation and self-regulation. DOMO understands that such a function requires permanent legal advice, and for this it has legal advisors hired to ensure support to the Compliance Officer in his decision-making.
- 2.3. The Compliance and AML/CFT Officer is one of the legal representatives before regulatory bodies (CVM, ANBIMA...) of the Manager, in the form of its articles of association. In addition to not performing any other activity that would limit his independence as a Compliance and AML/CFT officer, he has autonomy in his work.

**2.4. Compliance Management**

- 2.5. In the execution of the activities under its responsibility, DOMO will use electronic systems – Compliasset and Kronoos, and the services of lawyers or compliance consulting firms

(Derraik Menezes; Dyskant Advogados, Cescon Barrieu) for support and assistance in their duties. i.e

- 2.6. Regarding the management of internal controls and regulatory agenda, DOMO uses the Compliasset software, which keeps the Manager informed about the regulatory and self-regulatory activities, internal controls and adherence tests that must be observed due to the activity carried out by DOMO. In addition, the system has a digital library for storing documents and event logs, as well as having *log logs* for auditing purposes and *automatic backups*.

### **3. Compliance, Risk and AML Committee**

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- 3.1. Under the terms established in the Code of Ethics and Conduct, the Manager has a Compliance, Risk and AML Committee, with autonomy over the Manager's Compliance, Risk and AML/CFL issues. It is composed of the Compliance and AML/CFT Officer, Risk Officer and other Employees who are invited to participate on a timely basis as listeners or contributors.
- 3.2. The Compliance, Risk and AML/CFT Committee meets at least every four months, or whenever necessary, upon call by any of its members.
- 3.3. The resolutions shall be taken by the vote of the majority of those present, and minutes of the meetings shall be drawn up, which may be in summary form.
- 3.4. It is the responsibility of the Compliance, Risk and AML Committee:
  - Define, disclose and review the procedures of this Compliance Policy, DOMO's Code of Ethics and Conduct and other Internal Policies of the Manager;
  - Provide guidance to Employees in case of doubts regarding the application of DOMO's Internal Policies, which cannot be clarified directly by the Compliance area;
  - To ascertain and make certain decisions and approvals of Risk, Compliance, Prevention of Money Laundering and Non-Financing of Terrorism, Anti-Corruption and Contingency;
  - Investigate complaints or indications of conduct potentially contrary to Internal Policies and legal and regulatory standards, assessing the need for communication to regulatory, self-regulatory bodies or COAF. Also, evaluate and discuss internal sanctions, and may submit them to the Executive Committee, when deemed necessary; and self-regulatory
  - Define the ethical principles to be observed by all Employees, contained in the Manager's Internal Policies, and must previously approve any changes to these documents;
  - Promote the wide dissemination and application of the ethical precepts of Compliance in the development of the Manager's activities;
  - To treat all matters that come to its attention within the strictest confidentiality and preserving the interests and institutional and corporate image of the Manager, also ensuring the confidentiality of any whistleblowers of infractions or indications of infractions, even when they do not request it, except in cases where there is a legal/judicial need to disclose information;
  - Request, whenever necessary, for the analysis of its issues, the support of the external audit or other external consultants; and/or advisors

- Deliberate on situations that may be characterized as "conflicts of interest", both personal and professional. These conflicts may occur, including, but not limited to, the following situations addressed in Internal Policies: personal investments, external activities, gifts and entertainment, political contributions, transactions with related parties, allocations of opportunities and expenses between managed vehicles, among other examples; e
- Recommend possible sanctions to Employees for evaluation by the Executive Committee, in the event of total or partial violation of the rules and/or procedures contained in this Compliance Policy, legislation, regulation or self-regulation.

#### 4. Compliance role and responsibilities

4.1. The following activities are the primary responsibility of the Compliance area:

- Advice and advisory support to the business areas, internal committees, and the Board of Directors regarding rules and standards issued by regulatory and self-regulatory bodies;
- Management of the Code of Ethics and Conduct, ensuring the maintenance of the fiduciary duty to Investors, providing and implementing procedures to mitigate any conflicts of interest, as well as ensuring compliance with the normative prohibitions provided for in article 20 of CVM Resolution 21.
- Implement Employee Training Programs;
- Identify, document and assess the risks associated with the compliance of the Manager's activities with the normative precepts, analyzing the impact of the offer of new products and services or the relationship with certain Investors that involve a degree of risk;
- Maintenance of the regulatory forms, in particular, the Reference Form, being responsible for the periodic updating and review of those documents, including keeping the information updated on the Manager's website and with the CVM, also ensuring its completeness, veracity and adequacy of its language;
- Monitoring of the main standards, guidelines and alerts issued by regulatory and self-regulatory bodies;
- Maintenance and updating of the regulatory agenda containing all deadlines emanating from regulatory and self-regulatory standards, and must use electronic systems;
- Conducting periodic tests in order to monitor and evaluate the effectiveness of DOMO's Internal Policies and the Manager's systems and controls, suggesting and monitoring the improvement actions resulting from such tests, and may use its own electronic system for this purpose;
- Conducting access control tests on computer resources (internal directories and systems), as well as other tests to verify the functionalities of the electronic systems used by the Manager and effective availability of *backups* of documents and systems;
- Develop and make available to the Manager's Executive Board an internal control report as established in article 25 of CVM Resolution 21, which must be prepared annually and made

available by the last business day of April (based on the adherence tests referred to in the item above);

- Keep the *policies provided for in article 16 of CVM Resolution 21 updated and available on the Manager's website, as well as those whose disclosure is required by ANBIMA*;
- Monitoring of the risk management policy, fully observing the guidelines of article 26 of CVM Resolution 21 and article 39 of the ANBIMA Code and the best practices determined by ANBIMA, the implementation of periodic tests; through
- Interaction with regulatory and self-regulatory bodies on behalf of the Manager;
- Attendance to inspections and supervisions of regulatory and self-regulatory bodies, outsourced audits and *due diligences*, making the interface between their requests and DOMO's internal areas;
- Participate the process of selecting, contracting and supervising relevant service providers, partners and third parties, performing due diligence on integrity, reputation, technical capacity and regulatory adherence, as well as your monitoramento periódico enquanto durar o relacionamento.
- Management of Money Laundering and Terrorist Financing Prevention Activities, implementing the AML/CFT Policy and its procedures in order to prevent the occurrence of atypical situations and allowing their immediate identification in the occurrence, as well as any need to report to COAF;
- Establish the standard and approve communication and marketing materials, based on the provisions of regulation and self-regulation on the subject;
- *Cross border issues*: evaluate regulatory issues applicable in the foreign jurisdictions with which DOMO carries out operations or, perhaps, may obtain registration;
- Management of External Activities and Personal Investments Policies of Employees, including the granting of approvals when applicable, and periodic monitoring;
- To inform the CVM whenever it verifies, in the exercise of its duties, the occurrence or indications of violation of the legislation that the CVM is responsible for supervising, within a maximum period of ten (10) business days of the occurrence or identification;
- Monitor corporate emails of Employees;
- Annually verify whether Employees, especially controllers and other partners or Directors of the Manager, are involved in administrative proceedings of the CVM, Central Bank of Brazil, Superintendence of Private Insurance, Superintendence of Complementary Pension or ANBIMA, or criminal proceedings of any nature; National
- Monitor the completion carried out by the areas responsible for the requested information, and send the information, updated quarterly, to ANBIMA's database, under the terms of the self-regulation in force; e
- Confirm, through CVMWEB, by March 31 of each year, that the information contained in the Manager's registration form, provided for in CVM Instruction No. 51/21, remains valid, as

well as update said registration form whenever any of the data contained therein is changed, within seven (7) business days from the fact that caused the change.

- Analysis of new DOMO services, structures or businesses, assessing regulatory risks, conflicts of interest and the need for adjustments in policies, controls and procedures.

4.2. Whenever he deems it necessary or convenient, the Compliance Officer may take any matter within his competence for consideration or deliberation by the Compliance, Risk and AML/CFT Committee.

## **5. Maintenance – Reference Form and other Forms**

5.1. In order to comply with CVM Resolution 21, the Compliance area must submit the Reference Form, through the CVM's electronic system, by March 31 of each year.

5.2. In the preparation and review of the Reference Form, the Compliance area must ensure that the information contained therein is true, complete and does not mislead the investor, as well as is in simple, clear, objective and concise language.

5.3. It is the responsibility of the Compliance area to always keep the Reference Form on the Manager's website up to date and to make the most up-to-date version available to the CVM, reviewing it in its entirety at least annually and whenever significant changes occur in the Manager, in its structure and/or activities.

5.4. The Compliance area will also be responsible for preparing, maintaining and updating other regulatory forms, including, but not limited to, those requested by ANBIMA, according to the internal system maintained by the Compliance area, and under the terms of the Brazilian regulations applicable to DOMO's operations.

## **6. Annual Review of Compliance and Report of Internal Controls**

6.1. At least once a year, the Compliance area must conduct a complete review of the entire Compliance Program, which includes this and other Internal Policies of the Manager, the regulatory agenda, the training program, the revisions of forms and testes de aderência estabelecidos internamente.

6.2. DOMO's Compliance Program will be continuously evaluated and improved based on the results of adherence tests, risk indicators, audits, inspections, complaints, regulatory changes and best market practices.

6.3. As a result of the annual review, the Compliance area must prepare a report on the conclusions of internal controls referred to in article 25 of CVM Resolution 21, which must follow the terms of DOMO's own model containing, at least:

- The conclusions of the examinations carried out;
- Recommendations regarding possible deficiencies, with the establishment of sanitation schedules, when applicable; e
- If necessary, the statement of the Chief Management Officer or, when applicable, the Risk Officer regarding the deficiencies found in previous verifications and the measures planned, according to a specific schedule, or effectively adopted to remedy them.

- 6.4. The Chief Compliance Officer shall submit the report, for the calendar year immediately preceding the date of submission, to the Executive Committee by the last business day of April of each year.
- 6.5. The report will be available to the CVM at DOMO's headquarters.

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