



**Specific Policy of Prevention and Combat Against Money Laundering, Terrorism Financing and Corruption**

1. Responsible area for the subject: Safety Institutional Board – Disin
2. Scope: This policy guides the behavior of the Banco do Brasil. It is expected that the Controlled, Affiliated and Participating companies, define their directions from these guidelines, taking into account the special needs and the legal aspects to which they are subjected to.
3. Regulation: Resolution 4.557/2017, of the National Monetary Council.
4. Periodicity of revision: at least annually or extraordinarily, at any time.
5. Introduction: This policy guides the actions of Banco do Brasil in relation to the prevention and combat against money laundering, terrorism financing and corruption and the relation of policies associated with the management of the operational risk of Banco do Brasil.
6. We reject acts of corruption, money laundering, financing of terrorism or any other illegal acts.
7. We prevent the practice of money laundering, terrorism financing and corruption in conducting business in the country and abroad, in line with the national legislation, with the prevailing in each country where we operate and with legislation of transnational reach.
8. We operate in line with the commitments made by the Federal Government with regard to the prevention and control against money laundering, terrorism financing and corruption, observed the current legislation.
9. We encourage and participate in joint actions within the scope of the National Financial System, in the prevention and combat against money laundering, terrorism financing and corruption.
10. We adopt procedures, in the relationship with public entities, to inhibit the practice of corruption acts.
11. We use parameters established by law for registration of transactions and identification of those considered evidence of money laundering or terrorism financing, in the development of automated systems for monitoring the performed transactions.
12. We use specific parameters for the monitoring of financial transactions that might set up evidence of corruption.
13. We adopt procedures in the development of products and services, to inhibit its use for illegal practices linked to money laundering, terrorism financing and corruption.
14. We do not accept the movement of resources through anonymous checking accounts or linked to fictitious holders.



15. We evaluated, in operations analysis, the tools used, the form of realization, the frequency, the parties and amounts involved, the financial capacity and the economic activity of the client and any indication of irregularity or illegality involving the client or its operations, with a view to detecting signs of money laundering, terrorism financing or corruption.
16. We adopt procedures of due diligence for mitigating the risks of money laundering, terrorism financing and corruption, according to the activity, jurisdiction and the agents involved.
17. We adopt restrictive character measures as for the achievement of business and the maintenance of negotiating relationships with clients, suppliers and partners when the circumstances reveal evidence of engagement in acts linked to money laundering, terrorism financing or corruption, observed the current legislation.
18. We condition the maintenance of correspondence relationship with other banks to the existence, in the context of those banks, of mechanisms for prevention of money laundering and terrorism financing and hiring to the lack of administrative or judicial conviction the penalties of the Law 12.846, of Aug./1/2013.
19. We consider, in maintaining business relationship with partners and suppliers, the existence, within the context of those third parties, of mechanisms to prevent corruption.
20. We maintain specific channels for receiving denunciation, including anonymous.
21. We analyze indications and denunciation of acts of corruption committed by direct or third parties agents, for the benefit or interest of the Bank, against the public administration, in accordance with the current legislation.
22. We analyze indications and denunciation of acts of corruption committed by direct or third parties agents, against the equity, principles and commitments assumed by the Bank, in accordance with the current legislation.
23. We conduct in a classified manner, the registration processes, analysis and communication of financial transactions with evidence of money laundering or terrorism financing to the competent authorities, including in relation to clients, as well as the procedures for the investigation of suspected acts of corruption.
24. We preserve the identity of anonymous complainant.
25. We repudiate any acts of reprisal or retaliation taken against complainant in good faith that opt to identify themselves.
26. We adopt protective measures to employees who denounced in good faith in relation to facts arising from the denunciation.
27. We communicate to the competent authorities the transactions or proposed transactions which, in accordance with the current legislation, characterize evidence of money laundering, terrorism financing and corruption.
28. We collaborate with the public authorities in investigation related to acts detrimental to the Government arising from our activities, observed the current legislation.



29. We adopt criteria for hiring and conduct of employees, focused on prevention and combat against money laundering, terrorism financing and corruption.
30. We maintain specific employee training program on the prevention and combat against money laundering, terrorism financing and corruption.

Date of the latest review: Dec/18/2017