REGISTRATION POLICY FOR CUSTOMERS, SUPPLIERS AND SERVICE PROVIDERS

Summary

1. OBJECTIVE

1.1 Define procedures for VIA BRASIL employees involved in the identification, qualification, risk classification, obtaining documentation, analysis, approval and registration of registration information of customers, suppliers, service providers and others involved in operations of VIA BRASIL products, with a focus on KYC, KYB, anti-money laundering and terrorist financing (AML/CFT), sanctions, integrity and verification of the lawful origin of precious metals and financial resources.

1.2 This Policy complements, but does not replace it, the POLICY TO PREVENT AND COMBAT MONEY LAUNDERING, TERRORIST FINANCING AND PROLIFERATION OF WEAPONS OF MASS DESTRUCTION, as well as the POLICY FOR VERIFYING THE ORIGIN OF PRECIOUS METALS, and shall be applied in an integrated manner.

1.3 All registrations must comply with the principle of risk-based approach, so that customers, suppliers, intermediaries and operations with higher risk (e.g., gold and other precious metals, PEP, high-risk countries, mining, cooperatives, financial intermediaries) are submitted to enhanced due diligence.

2. REGISTRATION OF NATIONAL AND INTERNATIONAL CUSTOMERS

2.1 In its normal course of business, VIA BRASIL does not do business with individuals, individuals, only with companies (entities), financial institutions and duly authorized intermediaries, with which they have an affinity with its corporate purpose, or provide services along the chain of its activities. Customers are understood to be legal entities, domiciled or headquartered in Brazil or abroad, with whom VIA BRASIL carries out transactions for the purchase and sale of gold or other precious metals, as well as related operations.

2.2. The registration aims to consolidate the set of corporate, final beneficiary, economic-financial, operational, reputational, sanctionsand AML/CFT data and information, as well asgovernment licenses, of customers, which allows monitoring their compliance with VIA BRASIL's Policies. Registration is mandatory before the beginning of the business relationship and must be updated periodically, according to risk classification.

2.3. The following are documents, information and minimum verifications for the registration of national and international customers (legal entities, financial institutions, intermediaries, trading companies, refineries, distributors, jewelry stores, cooperatives and similar entities):

2.3.1. Federal Revenue Service, to validate the tax domicile and registration information of the client (CNPJ or equivalent tax registration abroad).

2.3.2. Consult lists of sanctions, restrictions and PEPs, including but not limited to:

a) Council for the Control of Financial Activities – COAF (UIF) / SISCOAF, for the identification of politically exposed persons (PEP), according to item 2.4;
b) Office of Foreign Assets Control (OFAC): American Anti-Terrorism List (SDN List and other relevant lists);
c) UN, European Union, and other relevant sanctions lists, as per risk assessment;
d) National lists of disqualified, impeded or sanctioned by regulatory bodies, when applicable.

2.3.3. Business Registry Form or international equivalent.

2.3.4. Consolidated contract/bylaws and all the latest contractual amendments, or equivalent documents abroad, in order to allow the identification of the corporate chain up to the final beneficiary natural persons.

2.3.5. Updated list of partners and managers, including percentage of participation and administration/representation powers.

2.3.6. Document that grants powers to the current board of directors or POA (power of attorney), with a current expiration date and clearly described powers, including to sign contracts and represent the company in gold and precious metals operations.

2.3.7. Identification of the legal representatives and holders of the FINAL BENEFICIARIES (copy of proof of address, maximum of 3 months; copy of photo ID (passport for foreigners) with the four corners visible).

2.3.8. Identity or passport of the attorneys-in-fact.

2.3.9. Copy of the current power of attorney.

2.3.10. Formal declaration of final beneficiary, signed by the legal representative, informing the corporate chain to the individuals who meet the criteria of item 2.5 of this Policy, as well as a declaration that there is no participation of persons, entities or countries subject to relevant sanctions or restrictions.

2.3.11. Statement of turnover for the last 12 months signed by the accountant (in USD/Euro when a foreign client).

2.3.12. Copy of the Balance Sheet and Income Statement for the last 12 months (USD/Euro when foreign), or audited financial statements, when applicable.

2.3.13. Proof of financial and operational capacity compatible with the size and intended volume of operations with gold and other precious metals, and may be requested, at the discretion of VIA BRASIL, management reports, credit limit, bank and commercial references, personnel structure and facilities.

2.3.14. Declaration of origin of the funds to be used in transactions with VIA BRASIL, when applicable, as well as identification of the main financial institutions used by the customer (banks, credit unions, fintechs and intermediaries).

2.3.15. For foreign clients: equivalent corporate documentation duly legalized, apostilled (Hague Convention) or consularized, as the case may be; sworn translation when in a language other than Portuguese, English or Spanish; proof of registration and authorization to operate in the country of origin (licenses, regulatory registrations, etc.).

2.3.16. Proof of specific licenses and authorizations to operate with gold and other precious metals, issued by competent authorities (e.g., ANM, Central Bank, customs authority, mining authority or sectoral regulator of the country of origin/destination).

2.3.17. Negative news/adverse media research, covering at least the last ten (10) years, in public and private, national and international databases, focusing on corruption, fraud, money laundering, environmental crimes, slave labor, human rights violations, sanctions and other relevant crimes.

2.3.18. Verification of reputational and compliance history (relevant litigation, criminal, civil, administrative proceedings, environmental, tax, regulatory sanctions, among others).

2.3.19. Other documents and information at the discretion of VIA BRASIL, in line with the risk-based approach.

2.4 POLITICALLY EXPOSED PERSON ("PEP") CLIENT

2.4.1 The identification, classification, approval and monitoring of clients, final beneficiaries, legal representatives, attorneys and other parties involved who are PEP must strictly follow the provisions of the POLICY TO PREVENT AND COMBAT MONEY LAUNDERING, TERRORIST FINANCING AND PROLIFERATION OF WEAPONS OF MASS DESTRUCTION (ITEM 6.9), as well as the rules of COAF and other regulators.

2.4.2 Every business relationship with PEP requires reinforced due diligence, approval at a previously defined managerial/senior level, and more frequent continuous monitoring, including updating the registration in a reduced period.

www.viabrasil1.com
contato@viabrasil1.com
+55 11 99999-0934
Av. Paulista, 1636 - Conj 4 - Pavimento 15
Bela Vista, São Paulo - SP

2.5 FINAL BENEFICIARIES

Natural persons are the ones who:

2.5.1. Own, directly or indirectly, more than 25% of the capital stock of an entity; or

2.5.2. Exercise, preponderantly, the corporate resolutions and have the power to elect the majority of the managers authorized to represent the Legal Entity Client, regardless of formal corporate interest, as a chain of participation; or

2.5.3. Do exercise significant control or influence over the management, administration, decision-making, or conduct of business, even through voting agreements, trusts, private foundations, investment agreements, or other legal structures; or

2.5.4. Represent legal entities incorporated as a publicly-held company or non-profit entity; or

2.5.5. In the case of Investment Funds, whether they are their shareholders or controllers, according to applicable rules.

2.6 MINING CUSTOMERS, COOPERATIVES, MINERS, INTERMEDIARIES AND FINANCIAL INSTITUTIONS

2.6.1 Mining clients (holders of PLGs, Utilization Guides, Mines, Mining Permits, etc.), miners' cooperatives and associations, commercial intermediaries, and financial or payment institutions involved in the chain of purchase, sale, and export of gold and other precious metals will be subject to enhanced due diligence, including, but not limited to:

a) Certificates and proof of mining regularity with the ANM, according to item 3 of this Policy;
b) Current environmental licenses and proof of compliance with the conditions;
c) Verification of the history of assessments, embargoes and environmental, labor and mining sanctions;
d) Confirmation of the lawful origin of the metal, with traceability from the origin (mine/mine) to the point of purchase by VIA BRASIL, in line with the PRECIOUS METALS ORIGIN VERIFICATION POLICY;
e) Evaluation of the operational capacity (physical structure, equipment, technical team, declared production capacity) consistent with the volume of metal sold;
f) Verification of the compatibility between the declared production capacity, the regulatory authorizations and the intended sales volume to VIA BRASIL.

2.6.2 Foreign clients (trading companies, refineries, banks, dealers, international distributors, industrial companies using gold and other precious metals) will also be subject to enhanced due diligence, especially regarding: high-risk jurisdictions, sanctions lists, complex corporate structure, use of intermediaries, transactions with payment in cash or through non-traditional financial institutions.

3. SUPPLIER REGISTRATION

3.1. The registration aims to consolidate the set of data and economic-financial information, environmental, governmental, mining and integrity licenses, of suppliers, which allows monitoring their compliance with VIA BRASIL's Policies, in addition to the PRECIOUS METALS ORIGIN VERIFICATION POLICY and the MONEY LAUNDERING PREVENTION AND COMBAT POLICY, THE FINANCING OF TERRORISM AND THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION.

3.2. The same requirements of corporate identification, final beneficiary, PEP, sanctions, negative media and financial/operational capacity described in Section 2, adapted to the nature of the relationship, apply to suppliers (including miners, cooperatives, organized miners, intermediaries, logistics providers, custody, transportation of valuables and related services).

3.3 Additional minimum documents, information and checks for suppliers are:

3.3.1 Copy of the environmental licensing with the Ministry of the Environment and, if applicable, the State and Municipal Secretariats of the Environment, to verify the existence of environmental assessments and embargoes.

3.3.2. Board of Trade Form of Business Registration, when it is a Cooperative or PJ.

3.3.3. Statement of turnover for the last 12 months signed by the accountant, when Cooperative or PJ.

3.3.4. Copy of the Balance Sheet of the last 12 months when Cooperative or PJ.

3.3.5. Copy of the incorporation documents and last amendment, when Cooperative or PJ.

3.3.6. Document that confers powers to the current board of directors or POA (power of attorney), when Cooperative or PJ.

3.3.7. Certificate from the Ministry of Labor: list of companies related to slave labor, when Cooperative or PJ.

3.3.8. Federal Court (electronic certificate).

3.3.9. CGU – National Registry of Disreputable and Suspended Companies (CEIS).

3.3.10. ANM – certificate of regularity of mining processes (PLGs, Utilization Guides and Mining).

3.3.11. Articles of association and last contractual amendment, as well as equivalent documents of the partners (including individuals).

3.3.12. Proof of the lawful origin of the metal supplied, including, when applicable: mining title number, mining area, authorized volume, production reports, invoices, transport permits, first commercialization records, as well as any other documentation provided for in the mining and tax legislation in force.

3.3.13. Supplier's statement on non-involvement with child labor, slave labor, environmental crimes, financing of armed conflicts, and other serious human rights violations.

3.3.14. Negative media research and reputational history, according to item 2.3.17, including mentions of illegal mining, deforestation, invasion of indigenous lands or conservation units, corruption, money laundering and other illicit activities.

3.3.15. Other documents and information at the discretion of VIA BRASIL.

4. REGISTRATION OF SERVICE PROVIDERS

4.1. If the contractor is a legal entity, VIA BRASIL will request a copy of the Articles of Association and the CNPJ and state or municipal registration (if applicable), as well as verify its situation with the Federal Revenue of Brazil and/or state and/or municipal farms (if applicable).

4.2. Service providers considered critical to the gold and precious metals chain (e.g., transportation of valuables or high-value cargo, warehousing/custody, customs clearance, consultancies, intermediaries, correspondents, commercial advisors, representatives) will be subject to integrity due diligence and AML/CFT similar to that applied to customers and suppliers, including:

a) Identification of final beneficiary and PEP;
b) consultation of sanctions lists;
c) Negative media research;
d) Verification of licenses, authorizations and certifications necessary for the exercise of the activity;
e) Evaluation of the compatibility between the size, structure, operational capacity and scope of the contracted services.

4.3. In addition, third-party due diligence questionnaires, declarations of compliance, signed codes of conduct, as well as evidence of compliance, AML/CFT and integrity programs may be required, according to the criticality of the provider.

5. DOCUMENT SUPPORT, ANALYSIS AND MONITORING

5.1 All documents requested by VIA BRASIL from its customers, suppliers and service providers must meet the minimum requirements of current legislation, as well as the principles of preventive nature and good market practices. Once all the relevant documentation has been collected, it will be submitted to analysis and verification, and in case of discrepancy, the client must be notified so that it can arrange for regularizations.

5.2. The document analysis will cover consultations with restrictive lists, as well as searches of a reputational and criminal nature of the client, and additional documents and/or information may be requested depending on the specific case, including, when applicable, additional proof of the origin of the financial resources, origin of the metal, economic justification of the operation and structure used (financial institutions, intermediaries, accounts abroad, etc.).

5.3. Without prejudice to the provisions of this Policy, VIA BRASIL may, at its sole discretion, in a case-by-case examination and with a focus on risk, waive certain document(s) considered not systemically relevant, provided that such waiver is duly justified.

5.4. The registration forms and copies of the supporting documents of customers, suppliers and service providers must be kept on file for a period of **five years,** counted from the date of the last transaction carried out with the customer, or for a longer period, if so required by applicable legislation or regulation.

5.5. The VIA BRASIL Registry must carry out verification tests, **with a maximum periodicity of 01 (one) year** to ensure the adequacy of the registration data. The PF and PJ registration forms can be signed both physically and through a Digital Certificate. For customers, suppliers and third parties classified as higher risk, the registration update must occur at a reduced interval (for example, annual or less), according to the approved risk matrix.

5.6. VIA BRASIL will not initiate or maintain a relationship with customers, suppliers, service providers or any third party that: (i) does not provide the minimum information and documents required by this Policy; (ii) appears on relevant sanctions lists, except as expressly permitted by law and subject to specific legal review; or (iii) presents relevant and unremedied evidence of involvement in illicit activities, including illegal mining, illegal deforestation, slave labor, corruption, money laundering or terrorist financing.

5.7. Atypical situations, suspicious operations or incompatible with the financial, operational capacity or registration profile of the customer or supplier must be immediately reported to the compliance/AML/CFT area, which will assess the need to report to COAF, according to current legislation.

Version and validity
Version: 06/15/2026.

VIA BRASIL COMERCIO
ATACADISTA DE
PRODUTOS DE
EXT:39439136000138

Assinado digitalmente por VIA BRASIL COMERCIO ATACADISTA DE PRODUTOS DE EXT:39439136000138
ND: C=BR, CN=VIA BRASIL COMERCIO ATACADISTA DE PRODUTOS DE EXT:39439136000138, L=SAO PAULO, O=ICP-Brasil, OU=videoconferencia, ST=SP
Razão:
Localização:
Data: 2026.06.19 11:12:25-04'00'
Foxit PDF Reader Versão: 2025.3.0