



This Policy establishes the internal rules and procedures applicable to Belcinto to combat money laundering and terrorist financing, in accordance with and in compliance with the provisions of Law No. 83/2017, of August 18 ("Law 83 / 2017 "), in Law No. 97/2017, of August 23 (" Law 97/2017 ") and in the applicable Regulations.

The provisions of the present Regulation apply to all Employees, Suppliers and Customers who have a affiliation with Belcinto.

All Stakeholders must fully respect the principles and rules provided for in this Regulation regardless of the territory in which they are located or where they operate.

All Employees must comply, in the exercise of their functions, with the national and international legal and regulatory rules applicable to the fight against corruption, money laundering.

The application of the present Regulation does not prevent or dispense with the application of any rules of legal source or of any applicable nature, regarding matters of prevention and fight against corruption and money laundering and, in case of contradiction with the provisions of the present Regulation, prevail applicable legal or regulatory provisions.

PROHIBITION OF CORRUPTION AND RELATED CRIMES

Belcinto Employees cannot request or accept, by themselves or through another person, any patrimonial or non-patrimonial advantages or their promise, for themselves or for another person, for the practice of any act or omission that relates to their employees. functional duties.

This guideline applies to the relationship with any element in the supply chain (customers, subcontractors, suppliers of materials or services) as well as with authority and public institutions.

Belcinto suppliers must not tolerate corruption and, as such, must ensure that their employees, subcontractors or representatives do not solicit or accept, by themselves or through another person, any equity or non-equity advantages or their promise, for themselves or for another person, for the practice of any act or omission that relates to their functional duties, in the relationship with customers, suppliers, public officials or others.

PROHIBITION OF MONEY LAUNDERING

- > It is forbidden to convert or transfer any Goods resulting from the practice of illicit acts or goods obtained with them in order to transform them into legally reusable capital, concealing their illegal origin or avoiding criminal identification and prosecution of the people involved in the illegal activity.
- > Aid or facilitation of any conversion or transfer operation referred to in the preceding paragraph is also prohibited.

- > The acquisition, possession or use of goods, knowingly, at the time of receipt, that come from a criminal activity or participation in an activity of that nature, whatever the type of crime in question, is prohibited.
- > It is also forbidden to participate in one of the acts defined in the previous numbers, an association to practice the said act, an attempt and complicity in its practice, as well as the fact of facilitating its execution or recommending someone to practice it.

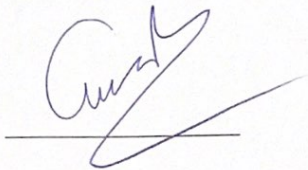
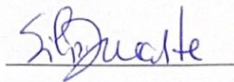
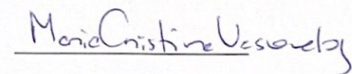
COMPETITION LAW

Any agreement with competitors, suppliers or customers that contravenes competition law, and that, as such, may jeopardize the freedom and competition law, is prohibited.

DUTY OF REFUSAL

The acceptance and maintenance of customers who have not made available or for which it is not possible to obtain, the identified elements and the respective means of proof necessary for the fulfillment of the duty of identification and diligence is prohibited.

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A handwritten signature in blue ink, appearing to be 'Cristina', written over a horizontal line.A handwritten signature in blue ink, appearing to be 'Silvia Duarte', written over a horizontal line.A handwritten signature in blue ink, appearing to be 'Márcia Cristina Vasconcelos', written over a horizontal line.