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Management Commitment

Dear colleague and collaborator of the Dartmouth International Group,

We are pleased to share this Ethics and Compliance Program with you. This program was based on our Code of Conduct, Values and Beliefs and aims to:

- Direct our efforts , ensuring compliance with the laws and regulations of the various countries in which we operate and compliance with internal company regulations and commitments made in signed contracts and agreements.
- Ensure the quality and veracity of all reports, records and information about the company's business and its customers, and
- To represent our commitment to the best practices to prevent fraud, corruption and money laundering.

This program is part of our continued effort to be the best provider of corporate services, international accounting and compliance support to our customers.

Our Compliance team will continuously improve our processes, policies, training and monitoring of these issues.

These concepts are fully extended to the companies that represent us.

We hope to have all your support and full commitment to ensure that our organization compliance guidelines are faithfully observed and that this program becomes part of our daily way of acting, working and continue to serve our clients.

Dartmouth International Group Senior Management

1. DEFINITIONS

For the purposes of this Manual, the following definitions shall apply

- “Anti Money Laundering (AML)”, refers to a set of procedures, laws or regulations designed to stop the practice of generating income through illegal actions.
- “Beneficial Owner”, according to the FATF recommendations the term refers to the natural person who ultimately owns or controls a company and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person.
- “Code of Conduct”, The Dartmouth Group Code of Conduct is an integral part of the Dartmouth Group Compliance Program.
- “Combating of Financing Terrorism (CFT)”, refers to a set of procedures, laws or regulations designed to prevent the financing of terrorism. Terrorist financing involves the solicitation, collection or provision of funds with the intention that they may be used to support terrorist acts or organizations. Funds may stem from both legal and illicit sources.
- “Compliance Committee”, committee formed by the COO, Senior Partners, CEO and CFO.
- “Dartmouth Client”, refers to all persons (physical or legal) that have contracted a service with Dartmouth through the signature of an agreement.
- “Dartmouth Group”, all the companies that make up the Dartmouth Group
- “Financial Action Task Force (FATF)”, is an inter-governmental body which sets standards, and develops and promotes policies to combat money laundering and terrorist financing.
- “FATF Recommendations”, are the internationally endorsed global standards against money laundering and terrorist financing: they increase transparency and enable countries to successfully take action against illicit use of their financial system.
- “Know Your Client (KYC)”, or “Client Due Diligence (CDD)” refers to the process of verifying a clients identity, as wells as checking that the client’s activities are in line with the identity which they have claimed.
- “Money Laundering”, is hereby defined as the process by which proceeds from a criminal activity are disguised to conceal their illicit origin. There are three main types of money laundering: i) the conversion of transfer of assets, knowing that such assets is the proceeds of crime, ii) the concealment of the true nature, source, location, disposition or ownership rights with the respect the property, knowing that such property proceeds of crime, iii) the acquisition, possession, or use of property knowing that such property is the proceeds of crime.
- “Money Laundering Offence”, is defined as whosoever directly or indirectly attempts to indulge or knowingly assists or knowingly is a party or is actually involved in any process or activity connected with the proceeds of crime and projecting it as untainted property shall be guilty of offence of money-laundering.
- “Politically Exposed Person (PEP)”, are individuals who are or have been entrusted with

prominent public functions both in foreign countries as well as in their country of residence. Due to their position and influence, it is recognized that many PEPs are in positions that potentially can be abused for the purpose of committing money laundering (ML) offences and related predicate offences, including corruption and bribery, as well as conducting activity related to terrorist financing (TF) Example of PEP include, but are not limited to:

Head of state or government
Governors
Ministers
Senior Members of the Legislature
Senior Politicians
Senior Government Officials
Military Officials
Judicial Officials

The definition of PEP is not intended to cover middle ranking or more junior positions .

- "Proceeds of crime" means any property derived or obtained, directly or indirectly, by any person as a result of criminal activity relating to a scheduled offence or the value of any such property.
- "Representatives": the companies that represent and / or source customers for the Dartmouth Group.
- "Reputational Risk" is defined as the potential that adverse publicity regarding Dartmouth's practices and associations, whether accurate or not, will cause a loss of confidence in the integrity of the company. Dartmouth is vulnerable to reputational risk because can easily become a vehicle for the concealment of illegal activities perpetrated by their customers.
- "Settlor" refers to the natural person or legal person who transfers the ownership of their assets to trustees by means of a trust deed or similar arrangement.

2. INTRODUCTION

The Dartmouth group has developed this Manual in order to maintain the obligation to fully comply with the regulations applicable to it and to reduce the risks inherent to the nature of its business. As consequence of this, the Dartmouth Group must follow the legislation in force in the countries where it operates or with which it does business, as well as the administrative rules stipulated by the organizations or authorities responsible for regulating the activities to which the Dartmouth Group is subject to and by all the internal rules of the company. In this sense, even though some countries may have less rigorous AML regulations than others, the Dartmouth Group will always adhere to the regulations of the most rigorous ones.

The Dartmouth Group has three main business areas:

- (i) Corporate Services (corporate secretarial services and certain fiduciary services);
- (ii) International Accounting;
- (iii) Compliance Support Services.

This Manual aims to establish the main ethical, operational and regulatory guidelines and will not aim to be an exhaustive treatment of all laws, regulations and standards applicable to its three main business areas. Further, this Manual is intended to discipline procedures and internal controls consistent with the nature, complexity, and risk of the Dartmouth Group Businesses, as well as to provide the Dartmouth Group with the necessary tools to build an AML/CFT program and KYC requirements that meet the minimum requirements of the FATF recommendations.

The policies set forth in this Handbook will be reviewed, updated and/or supplemented periodically and are always available to all employees and representatives on the Dartmouth Group website (www.dartmouthinternational.com). For the purposes of this Manual, any and all requests that depend on the authorization, guidance or clarification of the Compliance area should be sent through the e-mail: compliance@dartmouthinternational.com

This Manual should be observed by all employees of Dartmouth as well as by employees of all of its representative companies, who should read, understand and fully comply with the provisions set forth herein. Employees must also adhere to this Manual in writing by signing the Dartmouth Group Compliance Manual signature book.

In the event that the Dartmouth Group maintains a commercial, contractual or temporary relationship with third parties due to the nature of the contract and the information to be exchanged under this relationship or contract, this manual applies. The third party may be required to adhere to certain policies established in this Manual. Companies representing the Dartmouth group are subject to strict adherence to this manual.

This manual is provided for information purposes only, and is therefore, is not intended to be constructed as legal advice. Furthermore, under no circumstance shall this manual be relied on as evidence of complying with the requirements of the AML/CFT. Non-compliance with this Manual must be reported to the Compliance area and evaluated by the Risk and Compliance Committee.

Finally, our Code and Manual of Conduct and Compliance, which has the approval and full support of our Board of Directors, provides guidance for every employee on how to make legal and ethical decisions. Furthermore, it shows everyone with whom we interact, such as customers and suppliers, how seriously we take ethics and compliance and how fundamental it is to the Dartmouth Group that we have an engrained philosophy and culture of compliance and ethical business dealings.

3. CODE OF CONDUCT

3.1 Standard of Business Conduct

The Dartmouth International Group is committed to fostering a work environment in which all individuals are treated with respect and dignity. Each employee should be permitted to work in a business-like atmosphere that promotes equal employment opportunities. Additionally, Dartmouth promotes a work environment where diversity and inclusion are embraced and where our differences are valued and respected. We strictly prohibit all forms of discrimination, harassment or intimidation that are unlawful or otherwise violate our policies, whether committed by or against a manager, co-worker, client, supplier or visitor.

Dartmouth seeks to protect the personal and confidential information it collects, uses and maintains about its employees, prospects and clients, including, but not limited to, personal information, medical information, government-related information (such as national or government identification and tax data) and background check information. All Employees must comply with all Dartmouth policies and procedures relating to security and privacy of personal and confidential information, including using or sharing information only for the purpose for which it was collected, and only with authorized persons. Finally, to serve our clients and to meet our legal and compliance obligations, we are each expected to possess and maintain the skills and knowledge relevant to, and understand the policies that apply to, the performance of our workplace responsibilities. Dartmouth International is compliant to international data privacy regulation specific regarding to LGPD (Data Privacy Legislation) - Brazil.

Prohibited Conduct: The following conduct will not be tolerated and could result in disciplinary action, including termination:

- Any act which causes doubt about an Employee's integrity, such as the falsifying of Company records and documents, competing in business with the Company, unauthorized use or disclosure of the Company's Confidential Information, or engaging in any criminal conduct.
- Any act which may create a dangerous situation, such as carrying weapons, firearms or explosives on Company premises or surrounding areas, assaulting another individual, or disregarding property and safety standards.
- The use, sale or purchase or attempted use, sale or purchase of alcohol or illegal drugs while at work, or reporting to work in a condition not fit for work, such as reporting to work under the influence of alcohol or illegal drugs.
- Insubordination, including refusal to perform a job assignment or to follow a reasonable request from a Employee's manager or supervisor, or discourteous conduct toward customers, associates, or supervisors.
- Harassment of any form including threats, intimidation, abusive behavior and/or coercion of any other person in the course of doing business.
- Falsification or destruction of any timekeeping record, intentionally clocking in on another employee's attendance or timekeeping record, assisting another Employee's tampering with their attendance record or tampering with one's own attendance record.
- Failure to perform work, which meets the standards/expectations of the Employee's position.
- Excessive unauthorized absenteeism, chronic tardiness, or consecutive absence of three or more days without notification or authorization.
- Any act of dishonesty or falsification of any Company records or documents, including obtaining employment based on false, misleading, or omitted information.

Disciplinary Action: Dartmouth may terminate the employment or service relationship at will, at any time, without cause or advance notice. Thus, the Company does not strictly adhere to a progressive disciplinary system since each incident of misconduct may have a different set of circumstances or differ in its severity. The Company will take such disciplinary action as it deems appropriate and commensurate with any misconduct of the Employee.

3.2 Our Culture

Our culture has always been based on ethics and our values and beliefs reflect the commitment for all to act in accordance with the laws of all countries where we operate or serve clients and our internal rules.

Our Culture can be synthesized in the three following aspects:

- *Dartmouth Values*
- *Dartmouth Beliefs*
- *Dartmouth Code of conduct*

Dartmouth Values

Service

To be the best corporate service provider, international accounting and compliance support services to our customers

Solidity

To feed our sustainable growth by generating value for customers

Ethic

To act in a responsible and transparent manner

Respect

Respect people, employees, customers, always looking to be the best professional service provider and create the best working environment

Entrepreneurship

Encourage the initiative to do, innovate and take charge.

Dartmouth Beliefs

Talent Cultivation

We believe and trust in people and we invest time and resources cultivating our talent internally.

Meritocracy

We believe that people should be valued individually according to their contribution to the success of the company.

Excellence

We believe we can always do better

Pragmatism

We believe in being objective and relevant in everything we do, we value those who DO, who find solutions to client as well as company problems or opportunities.

Sense of Ownership

We value those who assumes responsibilities, works with passion and leads by example celebrating their achievements.

3.3 What is expected of everyone?

It is expected that all Dartmouth Employees ensure compliance with all obligations related to your activity, as well as obey the internal regulations of the Dartmouth Group. It is also expected that all employees be an example of conduct and take steps to ensure that everyone else conducts their activities ethically and in accordance with legal and regulatory requirements.

Finally, it is also expected that all employees know the Code of Conduct in full and participate in the education and training activities offered by the company.

3.4 Disclosure in Reports and Documents

Dartmouth's policy is to comply with all disclosure, financial reporting and accounting regulations applicable each particular client or company. In this sense, Dartmouth maintains the highest commitment to its disclosure and reporting requirements, and expects all Employees to record information accurately and truthfully in the books and records of the particular client.

3.5. Training and Educational Requirements.

New Employees will receive a copy of the Code during the orientation process conducted by representatives of the Compliance area and shall acknowledge that they have received, read and understand the Code and will comply with the requirements of the Code. In addition, continuing education requirements regarding the Code and matters related to the Code as the Company shall from time to time be established.

3.6 Anti-Bribery and Corruption

All of the Dartmouth Group companies are subject to the anti bribery laws of the countries in which they operate or do business with. With this purpose, Dartmouth has developed policies, procedures and internal controls for complying with anti-bribery and corruption laws, and prohibits any improper promise, offer, or the provision of anything of value to government officials, or to any other person for the purpose of obtaining or retaining business or influencing official action.

Additionally, the Dartmouth Group is required to adopt policies stating its commitment to comply with its AML/CFT obligations under the applicable laws and regulatory directives and to actively prevent any transaction that otherwise facilitates criminal activity or terrorism. The Dartmouth Group is committed to combating money laundering, terrorist financing and other crimes to the fullest extent permitted by law.

The Compliance area is responsible for monitoring all conducts and conflict of interests reported by the employees. In the cases in which it is understood that there is a suspected conduct in disagreement with the provisions settled on this manual, employees must immediately report them to the Compliance Officer (CCO), who may submit it to the appreciation of the Risk and Compliance Committee, so that appropriate measures may be taken. The compliance area is managed by the CCO. The duties of the CCO, among others, include:

- i) Developing an AML/CFT Compliance Manual;
- ii) Receiving and vetting suspicious transaction reports from employees;
- iii) Filing suspicious transaction reports with the applicable authority;
- iv) Ensuring that the Dartmouth Group compliance manual is implemented;

- v) Coordinating the training of all employees in AML/CFT awareness, detection methods and reporting requirements; and
- vi) Serving both as a liaison officer with the authorities and a point-of contact for all employees on issues relating to money laundering and terrorist financing

As consequence of this, all Dartmouth Employees must prevent entering into relationships or activities that may be against any of the guidelines established on this manual. Additionally, as a general rule, the Dartmouth Group expects that all employees dedicate their working hours solely to the interests of the Dartmouth Group and its Clients. Thus, employees' personal businesses/investments must follow the work philosophy outlined in this manual. Failure to comply with the guidelines provided herein will result in disciplinary action, which may include: dismissal and, where appropriate, forwarding of the information to competent regulatory bodies.

4. ANTI MONEY LAUNDERING AND COUNTER TERRORISM POLICY

4.1 *What is Money Laundering*

Money Laundering refers to the process by which proceeds from a criminal activity are disguised to conceal their illicit origin. There are three main types of money laundering: i) the conversion of transfer of assets, knowing that such assets are the proceeds of crime, ii) the concealment of the true nature, source, location, disposition or ownership rights with the respect the property, knowing that such property proceeds of crime, iii) the acquisition, possession, or use of property knowing that such property the proceeds of crime. These criminal activities refer to the following categories of offences:

- participation in an organized criminal group and racketeering;
- terrorism, including terrorist financing;
- trafficking in human beings and migrant smuggling;
- sexual exploitation, including sexual exploitation of children;
- illicit trafficking in narcotic drugs and psychotropic substances;
- illicit arms trafficking;
- counterfeiting currency;
- counterfeiting and piracy of products;
- environmental crime;
- murder, grievous bodily injury;
- kidnapping, illegal restraint and hostage-taking;
- robbery or theft;
- smuggling; (including in relation to customs and excise duties and taxes);
- tax crimes (related to direct taxes and indirect taxes);
- extortion;
- forgery;
- piracy; and
- insider trading and market manipulation.

4.2 *What is Financing of Terrorism?*

Terrorism financing involves the solicitation, collection or provision of funds with the intention that they may be used to support terrorist acts or organizations. Funds may stem from both legal and illicit sources. More precisely, a person commits the crime of financing of terrorism if that person by any means, directly or indirectly, unlawfully and willfully, provides or collects funds with the intention that they should be used within the knowledge that they are to be used, in full or part, in order to carry out an offense. It is important to remark that, unlike money laundering, the primary goal of persons (natural or legal) involved in the financing of terrorism is not necessary to conceal the sources of the money but to conceal the both the financing and the nature of the financed activity. Thus, the objective is to conceal the destiny of the funds and not the source.

4.3 *How are AML and CFT linked?*

In the case of Money Laundering (ML) the origin of the funds is always illicit, while the origin of the funds for Financing of Terrorism (FT) might also be from licit sources. In this sense, the primary objective of the first is to conceal the origin of the funds , while the primary objective of the second is to conceal the destiny. However, similar methods are used for both types of activities. In both cases, the person makes an illegitimate use of the financial sector. Therefore, an effective AML/CFT program must address for both risk issues: it must prevent and detect clients from entering into an agreement with Dartmouth with the purpose of ML and FT.

5. CUSTOMER DUE DILIGENCE (CDD)

5.1 What is CDD

CDD or KYC information comprises the facts about a customer that should enable the Dartmouth Group to assess the extent to which the customer exposes Dartmouth to a range of risks. These risks include money laundering and terrorist financing and above all risks, reputational risk. In this sense, Dartmouth needs to know its customers for a number of reasons:

- to comply with the requirements of relevant legislation and regulation
- to help Dartmouth, at the time the due diligence is carried out, to be reasonably certain that the customers are who they say they are, and that it is appropriate to provide them with the products or services requested to guard against fraud, including impersonation and identity fraud
- to help identify, during the course of a continuing relationship, what is unusual and to enable the unusual to be examined;
- to enable to assist law enforcement, by providing available information on customers being investigated following the making of a suspicion report to the applicable jurisdictions.

An inadequately implementation of the CDD procedure could lead to reputation risk. **Hence, a prohibition on setting up anonymous relationships is the baseline for the Dartmouth Group Compliance Guidelines.**

5.2 CDD Requirements

All clients of a company administered by Dartmouth are required to meet the CDD requirements established on this manual. A business relationship is defined as being formed when the client enters into an agreement with any of the Dartmouth Group companies , in order to hire a service from one of the main three business areas described on the introduction.

In accordance with the client identification requirements established by the FATF recommendations, all Dartmouth employees are required to collect certain information about Dartmouth clients. This includes collecting proof of identity, proof of address, photograph and such other documents in respect of the nature of the business and financial status of the client. Additional documents to determine the source of income of the client may be required as supporting identification documents, as determined by the compliance area. Furthermore, a risk-based approach should be applied. Consequently, the measures should be applied on a risk-sensitive basis depending on the type of customer, business relationship or nature of the transactions or activity.

When the shareholder of a company administered by Dartmouth is another company, documents that establish the incorporation status, mandate of governing body, director, and beneficial owner are required. In this sense, Dartmouth prohibits keeping anonymous clients or companies in obviously fictitious names. Also, it will need to be verified any person purporting to have been authorized to act on behalf of such company by obtaining evidence of his/her identity and verifying the identity of such a person. In this sense. Dartmouth must take all the reasonable steps for clients that are legal persons in order to clearly identify the natural person that ultimately controls the client.

The term natural persons include those persons who exercise ultimate and effective control over the legal person. For companies, the natural persons are those who own the controlling interests and those who comprise the mind and management of the company. For trusts, a natural person is the settlor, the trustee and any person exercising effective control over the trust and the beneficiaries. For Foundations this term refers to the Founder and the Protector.

We must determine whether or not a client is acting on behalf of another person. Where the client is acting on behalf of another person, all reasonable steps must be taken in order to obtain sufficient identification-data and to verify the identity of that other person.

Finally, all employees are required to carry out the full range of the CDD measures in this Manual. However, in reasonable circumstances, the Compliance Officer may apply the CDD measures on a risk-sensitive basis. Clients categorized as high risk clients and PEPs should always be analyzed through an enhanced due diligence CDD procedure.

5.3 When do CDD requirements apply?

CDD should be carried out by the Relationship Manager of the company on all of the following cases:

- Prior to the incorporation a new company
- Prior to the transfer of an existing company
- Opening another company for an existing client (update existing file).
- When there are changes of directors, shareholders, or attorneys in fact.
- There is a suspicion of money laundering or terrorist financing.
- There are doubts about the veracity or adequacy of previously obtained customer identification data (update existing file).

5.4 Dartmouth KYC/CDD Procedure

The KYC/CDD procedure consists of a series of steps that need to be undertaken on each case. Under no circumstance a step may be avoided without the previous written approval of the Compliance Officer. The steps are the followings:

1. Identify the client and verifying that client's identity using reliable, independent source documents, data or information.
2. Identifying the beneficial owner, and taking reasonable measures to verify the identity of the beneficial owner, such that the compliance area is satisfied that it knows who the beneficial owner is. For legal persons, copies of all of the necessary documents so that ownership and control structure of the customer is fully understood, should be required.
3. Understanding and, as appropriate, obtaining information on the purpose and intended nature of the business relationship.
4. Conducting ongoing due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with Dartmouth's knowledge of the client, their business and risk profile, including, where necessary, the source of funds.

Before accepting a client, each relationship manager should have already identified the beneficial owner of each company structure, and received all KYC Mandatory documents described in Annex IV. This identification should always be done by the implementation of face to face meetings and request of documents that help verify the identity of the person (passport, proof of address, driver license, reference letters) and any other type of documents as required by the compliance officer. It is also mandatory that all companies submit the Business Activity Form or the Company Confirmation Form, and that all beneficial owners, settlors, and directors submit the KYC form attached in Annexes I, II and III respectively.

If an employee is unable to comply with the above requirements Dartmouth should prevent from accepting the client or proceed to terminate the business relationship, and should consider making a suspicious transactions report in relation to the client to the CCO.

Once the above is met the CCO will establish a risk classification. The possible risk classifications are the followings: Low, Medium and High Risk.

Low Risk: If the compliance qualifies the client as low risk, the regulator may exempt the client from some requirements or impose reduced customer due diligence (CDD) requirements.

Medium Risk: the compliance officer imposes regular CDD requirements.

High Risk: the compliance officer imposes enhanced CDD requirements.

Higher-risk customers and their transactions should be reviewed more closely and more frequently throughout the term of their relationship with Dartmouth. Dartmouth may determine that a client poses a higher risk because of the client's business activity, ownership structure, anticipated or actual volume and types of transactions, including those transactions involving higher-risk jurisdictions. As a general rule, all PEPs and clients that are suppliers of governments (at any level) are considered high risk. If so, Dartmouth should consider obtaining, both at when opening a new company (or transferring an existing one) and throughout the relationship, the following information on the client:

- Purpose of the company.
- Source of funds and wealth.
- Individuals with ownership or control over the account, such as beneficial owners, signatories, or guarantors.
- Occupation or type of business (of clients or other individuals with ownership or control over the company)
- Financial statements.
- Banking references.
- Copies of the tax declarations of the beneficial owners
- Domicile
- Description of the client's primary trade area and whether international transactions are expected to be routine.
- Description of the business operations, the anticipated volume of currency and total sales, and a list of major customers and suppliers.
- Explanations for changes in the activity of the company

As the CDD process is an ongoing process, measures should be taken to ensure the profiles are current and monitoring should be risk-based. Dartmouth should also consider whether risk profiles should be adjusted or suspicious activity reported when the activity is inconsistent with the profile.

As a general rule, Dartmouth should prevent from entering into business with clients classified as high risk or that may increase Dartmouth's reputational risk significantly. Clients classified as high risk should have the written approval of the Committee. In this sense, reputational risk represents a major threat to the Dartmouth Group and therefore, needs to protect itself s by means of continuous vigilance through an effective KYC program. Furthermore, when there is sufficient evidence of any illegal activities, the CCO, with the prior written approval of the Committee, should make a report to the applicable authority.

5.5 Treatment of PEPs

The potential risks associated with PEPs justify the application of additional AML/CFT preventive measures with respect to business relationships with PEPs. To mitigate these risks, Dartmouth will require additional measures in order to prevent the potential abuses by such persons. These additional requirements are preventive (not criminal) in nature, and should not be interpreted as stigmatizing PEPs as such being involved in criminal activity. Refusing a business relationship with a PEP simply based on the determination that the client is a PEP is contrary to Dartmouth policies. Family members (e.g., parents, siblings, spouses/partners, and children), and closed associates (partners outside the family unit, prominent members of the same political party, business partners or associates) of PEPs will have the same treatments as PEPs. Once an employee establishes that the potential client is a PEP, a family member of a PEP or a closed associate, Dartmouth will apply the enhanced risk mitigation measures.

When considering whether to establish or continue a business relationship with a PEP, the focus should be on the level of ML/TF risk associated with the particular PEP, and whether if Dartmouth has adequate controls in place to mitigate that ML/TF risk so as to avoid the Dartmouth Group from being abused for illicit purposes should the PEP be involved in criminal activity. This decision will be taken on the basis of the customer due diligence process and with an understanding of the particular characteristics of the public functions that the PEP has been entrusted with. The decision to establish or continue a customer relationship with a PEP will be guided primarily by an assessment of ML/TF risks, even if other considerations, such as regulatory risk, reputational risk or commercial interests, should be taken into account.

5.6 Record keeping

Dartmouth will keep records for at least five years after the business relationship with the client is terminated from all records, communications and transactions effected with it. While record keeping is required for even lower risk accounts, it is important to note that no specific form of record keeping is required for CDD compliance. Moreover, different types of record keeping are allowed, from storing electronic scans of ID documents and registration forms to handwritten reference details on identity or transaction documents.

5.7 Examples of suspicious activities

The followings are some examples of suspicious activities that should be reported immediately to the compliance officer:

- A client uses unusual or suspicious identification documents that cannot be readily verified;
- A client uses different taxpayer identification numbers with variations of his or her name;
- A client is reluctant, when establishing a new company, to provide complete information about the nature and purpose of its business, anticipated account activity, prior banking relationships, the names of its officers and directors, or information on its business location;
- Client's home or business telephone is disconnected;
- The client is a trust, or Private Investment Company that is reluctant to provide information on the actual controlling parties and underlying beneficiaries;
- A customer is reluctant to provide information needed to file a mandatory report, to have the report filed, or to proceed with a transaction after being informed that the report must be filed;
- The currency or fund transaction patterns of a business show a sudden change inconsistent with normal activities;

- Reluctance to give the financial statements or bank statements if Dartmouth is Director or trustee;
- Client does business with any government (i.e. client is a supplier of the government).

The above list is intended for guidelines purposes only, and does not intend to be an exhaustive list of all type of suspicious activities. Each employee shall use his own judgment and report to the compliance area if any suspicion arises.

6. TRAINING POLICY

An annual compliance and conduct training is mandatory for all employees. The training of employees may take different forms: internal workshops or seminars provided by the entity or professional, a domestic industry-organized training, overseas training, etc., and shall be first approved by the Compliance Committee. The compliance training program must be fully implemented and reasonably designed to meet the program established by the Committee.

The frequency, delivery mechanism and focus of training in AML/CFT must be tailored in a way that provides employees with updates on current and emerging AML/CFT issues and appropriately tests their continued awareness and understanding of established AML/CFT measures within the laws and the Dartmouth Group internal control systems. In this sense, the training for employees is not restricted to any particular class or rank of employees, although key training requirements will relate to key employees who are critical to Dartmouth's anti-money laundering and terrorist financing program. For employees who are not considered key to Dartmouth's anti-money laundering and terrorist financing program, such training may be limited to basic anti-money laundering and terrorist financing issues. In addition, the training rendered must be appropriate and proportional with respect to money laundering and terrorist financing. It must be so designed as to enable key employees to detect and avert acts of money laundering and terrorist financing. The training objective aims to provide a good understanding and appreciation of the established laws, regulations, policies, processes and procedures on AML/CFT. It is not sufficient to simply train key staff; other staff must be considered as whole to the organization and if not made aware, they could be used by unscrupulous persons to engage in money laundering or terrorist activities with respect to the entity or professional that employs them. At the bare minimum, so-called non-essential staff must be trained in the basic aspects of AML/CFT.

All training will be scheduled in advance and the employees will be informed through an electronic invitation to be sent by the Compliance area. It is the duty of every Collaborator to participate in the training, and must justify his absence to the Compliance area. The employees who have participated of the training must sign the "Training Policy Compliance Term", Annex VI of this Manual. A copy of the attendance list and any certificates must be kept by the Compliance department for a period of not less than five (5) years, and may be made available.

7. COMPLIANCE GOVERNANCE

All Employees of the Dartmouth Group must sign the Term of Adhesion to the Personal Posture Policy of this Manual, being obliged to know the entire contents of this Policy and to comply fully with it. The purpose is to establish procedures and rules for the personal business of Employees in order to avoid situations that may characterize a conflict of interests or the misuse of confidential information of the company or its clients.

Employees are prohibited from conducting business on the basis of any confidential information of which he /she is aware or encouraging any person to do so, regardless of how the information was acquired, and whether or not the Information is Privileged. Employees are also prohibited from buying or selling financial assets based on the knowledge of the negotiations proposed by Clients or even by the Dartmouth Group, nor they should request nor accept any preferential term or condition in connection with any negotiation or personal business somehow related to the Dartmouth Group. They must limit the risks of their personal business, negotiation or activities that represent a high degree of financial risk to the Employee's situation can be a source of distraction, affecting their ability to perform their professional responsibilities effectively. Finally, they must follow these Policies and Procedures applicable to them.

Additionally, all employees must make sure that they are not infringing any rules on the use of Insider Information, or duty of confidentiality, and that the Rules of Conduct of the Dartmouth Group must be observed in full.

Compliance area is responsible for designing and maintaining the Compliance Program of the Dartmouth Group companies, which includes the review and periodic updating of the Policies contained in this Manual and the Rules of Conduct, as well as the implementation of internal controls and adhesion tests to monitor their effectiveness and, also, the accomplishment of training to Employees.

7.1 Role and Responsibilities of the Compliance Area

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

- Develops, initiates, maintains, and revises policies and procedures for the general operation of the Compliance Program and its related activities to prevent illegal, unethical, or improper conduct.
- Manages day-to-day operation of the Program.
- Provides advice and consultative support to business areas, internal committees and the Board of Directors regarding rules and standards issued by regulatory and self- regulatory bodies;
- Manages the Dartmouth Group's Rules of Conduct, ensuring the maintenance of fiduciary duty to Clients and implementing procedures to mitigate potential conflicts of interest;
- Implements employee training Programs;
- Monitor the main norms, guidelines and alerts issued by regulatory and self- regulatory bodies and keep updated the regulatory agenda containing all deadlines emanating from such bodies, and may use electronic systems or spreadsheets to do so;
- Performs a risk assessment and determine the level of risk for each client;
- Collaborates with other departments to direct compliance issues to appropriate existing channels for investigation and resolution. Consults with the Relationship Managers as needed

to resolve difficult compliance issues;

- Conducts periodic tests in order to monitor and evaluate the effectiveness of the Policies established in this Manual and of the company's systems and controls, suggesting and monitoring the actions of improvements resulting from such tests, and may use an electronic system to do so;
- Acts as an independent review and evaluation body to ensure that compliance Issues/concerns within the Dartmouth Group are being appropriately evaluated, investigated and resolved;
- Identifies potential areas of compliance vulnerability and risk; develops/implements corrective action plans for resolution of problematic issues, and provides general guidance on how to avoid or deal with similar situations in the future;
- Maintains minutes and decisions of the Compliance Committee;
- Testing of access controls in computer resources (internal directories and systems), as well as other tests to verify the functionalities of the electronic systems used by the Managers and to make effective backups of documents and systems.

Whenever it deems necessary or appropriate, the CCO may take any matter within its competence for consideration or deliberation by the Risk and Compliance Committee. It is the responsibility of the compliance area to keep the website up to date and to make available the most up-to-date version of the compliance program to all.

7.2. Compliance Officer and Risk and Compliance Committee

The Compliance area is primarily responsible for the dissemination and supervision of the internal rules, controls and procedures of the Managers, in order to mitigate the operational, regulatory, reputational and legal risks of its activities.

The CCO is the responsible person for the compliance area, and is therefore responsible for the implementation of the compliance program. As a Compliance Officer, he reports directly to the Executive Compliance Committee, and has full authority over the implementation of the Dartmouth Group Compliance Program.

Under the terms of the Rules of Conduct, the Dartmouth Group has a Risk and Compliance Committee with autonomy on the risk and compliance issues of their operations. The Risk and Compliance Committee meets quarterly, or whenever necessary, upon convocation by any of its members. Decisions shall be taken by a majority vote of the attendees, and minutes of the meetings shall be drawn up, which may be summarized.

The Risk and Compliance Committee is formed by the Senior Partners, the CEO, CFO, and the CO of the company. It is the responsibility of the Risk and Compliance Committee:

- To review the written progress reports detailing the form and manner of all actions taken to secure compliance with the compliance program and applicable regulations;
- To ensure that Dartmouth has sufficient financial and managerial resources, processes, personnel and control systems to implement and adhere to the provisions of the compliance program

- To approve and review the procedures in this Manual, the Rules of Conduct and other Policies of the Dartmouth Group;
- To provide guidance to employees in case of doubts about the application of the Dartmouth Group Policies, which cannot be directly clarified by the Compliance Officer;
- To determine and make certain decisions and approvals of Risk, Compliance, Prevention of Money Laundering and Non-Financing of Terrorism, Anti-Corruption and Contingency;
- To establish complaints or indications of conduct potentially contrary to internal Policies and legal or regulatory norms, assessing the need for communication to regulatory bodies and evaluate and discuss internal sanctions, and may submit to the Executive Committee, when deemed necessary;
- To define the ethical principles to be observed by all Employees, contained in the internal Policies of the Company, and must approve previously any changes in these documents;
- To oversee, through management reports to the Committee, the continuing maintenance and enhancement of a strong and sustainable compliance culture;
- To address all matters that come to its attention within the strictest secrecy and preserve the interests and corporate image of the Managers, and also guarantee the secrecy of any complainants of infractions or indications of infractions, even when they do not request, except in Cases where there is a legal / judicial need for disclosure of information;
- Request, when necessary, for the analysis of their issues, the support of the internal or external audit or other external consultants;
- Deliberate on situations that can be characterized as "conflicts of interest" both personal and professional. These conflicts may occur, including but not limited to the following situations addressed in our own policies: personal investments, external activities, gifts and entertainment, political contributions, transactions with related parties, allocation of opportunities and expenses among managed vehicles, among other examples ; and
- Deliberate and impose possible sanctions on Employees, and may submit to the Executive Committee proposals for the application of penalties, for evaluation of the latter, when deemed necessary.

The Committee is responsible for overseeing Dartmouth's ethics and compliance programs, including its Code of Conduct and legal and regulatory compliance matters, and receive periodic reports on such programs from appropriate members of management, including information on any significant compliance issues. It shall also monitor the effectiveness of the process used by management to identify, investigate and address allegations of potential misconduct and violations of risk and compliance policies, including the Code and Manual of Conduct and Compliance or possible legal and regulatory violations.

In order to ensure that the above tasks are properly accomplished the Risk and Compliance Committee shall have full autonomy to perform the duties detailed in this Policy, and shall act under the direct coordination of the Compliance Officer. The matters dealt with by this Committee are strictly confidential. In addition, the Committee shall have the authority to delegate any of its responsibilities to subcommittees of one or more persons, including persons who are not directors, as permitted by law and applicable stock exchange regulations, as the Committee may deem appropriate.

8. ANNUAL COMPLIANCE REVIEW

At least once a year, the Compliance area shall conduct a complete review of any Compliance Program, which includes this Manual, the regulatory agenda, the training program, the form reviews and adherence tests. As a result of the annual review, the Compliance area must prepare a report of its conclusions. The CCO should conduct or supervise the review.

Notwithstanding the above, the first annual review must be completed within 18 months of the date when the Compliance program was adopted. Matters such as if there have there been any issues with interpretations or confusion about the application of specific policies and procedures, or if there have been any problems in enforcing the compliance program, will need to be attended.

Annex I: COMPANY CONFIRMATION FORM

CONFIRMATION OF COMPANY INCORPORATION

Company Limited by Shares

British Virgin Islands - BVI

1. Name preference for the company / Nome de preferência				
1				
2				
3				
2. Capital				
AUTHORIZED CAPITAL (Capital autorizado)			SHARES (Ações)	
50,000 shares			No par value (Sem valor nominal)	
			Single Class	
Shares Amount (quantidade de ações):			Par value (com valor nominal) USD 1.00	
			Multiple Classes	
SPECIAL M&A (Estatuto Especial)			INITIAL SUBSCRIBED CAPITAL CONTRIBUTION IN USD (Montante inicial ser integralizado em USD)	
Name of Shareholder (Nome do Acionista)		Initial subscribed amount Montante subscrito inicial	Initial subscribed shares (Ações subscritas iniciais)	Joint Tenancy (co-titulares)
3. Purpose of the company / Tipo de empresa				
3.1 Will the company hold shares in closely held companies? / A empresa terá participação societária em empresas de capital fechado?				
If yes, please state details of each / Indique detalhes de cada:				
In which countries / Indique onde:				
3.2 Will the company invest over 50% of its assets in marketable securities and financial investments? / A empresa investirá mais de 50% dos seus ativos em títulos e valores mobiliários e aplicações financeiras?				
3.3 Will the company invest 50% of its assets in real estate or other "fixed assets"? / A empresa investirá mais de 50% de seus ativos em imóveis ou outros "ativos fixos"?				

3.4 Will the company operate an active business? Please state details / A empresa vai operar um negócio ativo? Indique detalhes.	
3.5 Is there any investment manager or advisor with discretionary investment decisions or order execution authority? / Existe um gestor de investimentos ou consultor com decisões discricionárias de investimento ou autorização para executar ordens de investimento?	
3.6 Other/Outro - Please insert details if all the above questions were answered "No". / Indique detalhes caso que todas as perguntas acima foram respondidas "Não".:	
3.7 Will the company have a bank account? Please indicate where/ A empresa terá uma conta bancaria? Indique onde.	
4. Expected Annual Income of the Company / Volume de receita annual esperado da empresa	
5. Source of funds used to capitalized the company / Origem dos fundos usados para capitalizar a empresa	
6. Legal representatives / Representantes legais da empresa	
	Other Director (Outro Diretor) - Please insert names below / Por favor indique os nomes abaixo.
	1.Name / Nome:
	2.Name / Nome:
7. Attorney-in-fact (specific powers to be granted) / Procurador (poderes específicos de representação)	
	Representation in Brazil for foreign investor / Poderes para investimento estrangeiro no Brasil.
	Name / Nome:
	General, all purpose / Geral, todas as finalidades
	Name / Nome:
8. Mandatory - Name and Address for correspondence and invoices / Obrigatório - Dados para encaminhamento de correspondências e faturas	
Name (Nome):	
Address (Endereço):	
City (Cidade):	State (Estado):
Country (País):	Postal Code (CEP):
E-mail:	
Skype:	

9. Please confirm the address to deliver physical documents / Por favor, confirme o endereço para entregar documentos físicos		
	Above / Endereço acima	
	Address / Endereço:	
10. Please confirm how invoices and other communications may be made / Favor confirmar como faturas e outras comunicações devem ser feitas		
	E-mail	
	Only physical documents / Somente documentos físicos	
11. Additional document needs / Documentos adicionais (Optional, charged separately / Opcional, cobrado separadamente)		
Document (Documento)	Nr. of copies (Nº de cópias)	Notarized / Notarizado (N) , Consularized / Consularizado (C) , Apostilled / Apostilhado (A)
Certificate of good standing		
Certificate of incumbency		
12. Accounting Services and Financial Record Keeping/Serviços de Contabilidade e Arquivos Financeiros (One of the options must be chosen below / Uma das opções abaixo deve ser escolhida)		
Dartmouth Accounting Services and Financial Record Keeping / Serviços de Contabilidade e Arquivo Financeiro pela Dartmouth		
Third Party Accounting Services and Financial Record Keeping / Serviços de Contabilidade e Arquivo Financeiro por terceiros, outros prestadores		
Financial Records will be the responsibility of / Arquivos Financeiros serão a responsabilidade de:		
Name/Nome: <input type="text"/>		
Address where the financial records will be maintained/Endereço do arquivo dos registros financeiros e transações:		
<input type="text"/>		
13. Mandatory documents / Documentos obrigatórios		
	Copy of the Passport and ID of each shareholder, beneficial owner, director and attorney in fact. (Cópia do passaporte e identidade de cada acionista, beneficiário, diretor e procurador)	
	Copy of the Proof of residence of each shareholder, beneficial owner, director and attorney in fact (Cópia do comprovante de residência de cada acionista, beneficiário, diretor e procurador)	
	Reference letter from a Bank or a Professional Intermediary for each shareholder and beneficial owner (Carta de referência bancária ou de um profissional intermediário para cada acionista e beneficiário)	
	KYC Form for each shareholder, beneficial owner, director and attorney in fact Formulário KYC preenchido e assinado por cada acionista, beneficiário, diretor, e procurador	
IMPORTANT		
<div>÷ I declare that, to the best of my knowledge and belief, the information given in this form is true, complete and valid. / Declaro que, tanto quanto é do meu conhecimento e crença, as informações contidas no presente formulário são verdadeiras, completas e válidas.</div> <div>÷ I confirm that, to the best of my knowledge and belief, the original source of the funds used to capitalize the company is derived from legitimate activities. / Confirmando que, tanto quanto é do meu conhecimento e crença, a fonte original dos fundos utilizados para capitalizar a empresa é derivado de atividades legítimas.</div> <div>÷ Where legally obliged to do so, I hereby consent to the recipient sharing this information with the relevant tax information authorities. / Onde obrigado legalmente a fazê-lo, eu consento compartilhar essas informações com as autoridades relevantes de informação fiscal.</div> <div>÷ I agree to the terms and conditions contained in the "Know Your Client - KYC" Form which I had already filled and signed / Eu concordo com os termos e condições contidos no formulário "Conheça Seu Cliente - KYC" o qual eu já preenchi e assinei.</div>		

Signature of principal shareholder

Date/Data

Annex II: BUSINESS ACITIVITY FORM



Business Activity Confirmation Form / Formulário de Confirmação de Atividades de Negócios

1 Name of the Company / Nome da Empresa

2 Country of Incorporation / País de Incorporação

3 Type of ownership / Tipo de estrutura

Please indicate the type of ownership / Indique o tipo de estrutura:

☐ Trust or Foundation / Trust o Fundação (Please provide details / indique detalhes).

☐ Another company / Outra Empresa (Please provide details / indique detalhes).

☐ Individuals / Pessoas Físicas.

4 Purpose of the company / Tipo de empresa

4.1 Does the company have a bank account? If yes, please state in which countries. / A empresa possui conta bancária? Se sim, por favor indique em quais países.

4.2 Does the company hold shares in closely held companies? / A empresa mantém participação societária em empresas de capital fechado?

If yes, please state details of each / Indique detalhes de cada:

In which countries / Indique onde:

4.3 Does the company invest over 50% of its assets in marketable securities and financial investments? / A empresa investe mais de 50% dos seus ativos em títulos e valores mobiliários e aplicações financeiras?

4.4 Does the company invest over 50% of its assets in real estate or other "fixed assets"? / A empresa investe mais de 50% de seus ativos em imóveis ou outros "ativos fixos"?

4.5 Does the company operate an active business? Please state details / A empresa opera um negócio ativo? Indique detalhes.

4.6 Is there any investment manager or advisor with discretionary investment decisions or order execution authority? / Existe um gestor de investimentos ou consultor com decisões discricionárias de investimento ou autorização para executar ordens de investimento?

4.7 Other/Outro - Please detail / Indique detalhes de cada:

5	Source of the Funds used to capitalize the company / Origem dos fundos usados para capitalizar a empresa
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Please explain the source of funds that were used to capitalize the company / Por favor, indique origem dos fundos que foram usados para capitalizar a empresa:

☐ Employment or Business income / Rendimentos do trabalho ou negócios – *If yes, please specify employer and position / Indique detalhes*

☐ Gift or inheritance from a third party / Doação ou herança de um terceiro – *If yes, please give details / Indique detalhes*

☐ The disposal of a business or other assets / A alienação de uma empresa ou de outros ativos - *If yes, please give details / Indique detalhes*

☐ Other / Outro - *If Other, please give details / Indique detalhes .*

6	Expected anual income of the company / Volume de receita anual esperado da empresa
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7 Declaration / Declaração

- I declare that, to the best of my knowledge and belief, the information given in this form is true, complete and valid. // *Declaro que, tanto quanto é do meu conhecimento e crença, as informações contidas no presente formulário são verdadeiras, completas e válidas.*
- I confirm that, to the best of my knowledge and belief, the original source of the funds used to capitalize the company is derived from legitimate activities and will not come from, constitute or represent the proceeds of drugs trafficking, arms dealing, terrorism, bribery or fraud of any type. // *Confirmo que, tanto quanto é do meu conhecimento e crença, a origem dos fundos utilizados para capitalizar a empresa é derivada de atividades legítimas, e não virá, constituirá ou representará qualquer produto de tráfico de drogas, tráfico de armas, terrorismo, corrupção ou fraude de qualquer tipo.*
- I undertake to advise the recipient promptly and provide a new "Business Activity Confirmation" form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete. // *Comprometo-me a informar ao destinatário prontamente e fornecer uma nova "Business Activity Form" dentro de 30 dias em que qualquer alteração nas circunstâncias ocorra que faz com que qualquer uma das informações contidas no formulário a ser imprecisas ou incompletas.*
- Where legally obliged to do so, I hereby consent to the recipient sharing this information with the relevant tax information authorities. // *Onde obrigado legalmente a fazê-lo, eu consento compartilhar essas informações com as autoridades relevantes de informação fiscal.*

Signature: _____

Print Name: _____

Date: _____

Annex III: KYC FORM

KNOW YOUR CUSTOMER (KYC) DECLARATION (FOR INDIVIDUALS ONLY)

Form necessary for all shareholders, beneficial owners, attorneys in fact and directors.

Formulário necessário para todos os acionistas, usufrutuários, procuradores e diretores.

Section I: General Information (Informações Gerais)	
1- Full Name (as per passport or equivalent): <i>Nome completo (como por passaporte ou equivalente):</i>	
2- Date of birth: <i>Data de nascimento:</i>	
3- Place of birth: <i>Naturalidade:</i>	
4- Address: <i>Endereço:</i>	
5- Telephone: <i>Telefone:</i>	
6- E-mail:	
7- Passport Number: <i>Número do passaporte:</i>	
8- Country of Issue: <i>País de emissão:</i>	
9- Issue Date: <i>Data de emissão:</i>	
10- Expiration Date: <i>Data de validade:</i>	
11. Tax ID number: <i>Numero de CPF:</i>	
<p>12. Do you have any pending criminal indictments or have you ever been convicted of any crime/fraud in a court or under any investigation of any nature? If yes, please provide details.</p> <p><i>Você tem acusações criminais pendentes ou você já foi condenado por qualquer crime / fraude em um tribunal ou em qualquer investigação de qualquer natureza? Se sim, por favor, fornecer detalhes</i></p> <p style="text-align: center;"> <input type="checkbox"/> Yes <input type="checkbox"/> No </p>	

Section II: Other Information	
Marital Status	
Occupation Type:	If other, please explain:

Section III: Source of Wealth	
<p>1- Please specify: <i>Por favor, especifique</i></p>	<p>a- Employment / Salaried (<i>please complete 1.a</i>) <i>Emprego (por favor, preencha 1.a)</i></p> <p>b- Business Owner (<i>please complete 1.b</i>) <i>Dono da empresa (por favor, preencha 1.b)</i></p> <p>c- Retired or Investor (<i>please complete 1.c</i>) <i>Aposentado ou Investidor (por favor, preencha 1.c)</i></p>
<p>1.a: If employed (<i>Se empregado</i>):</p> <p>Name of Employer (<i>Nome do empregador</i>):</p> <p>Position / Title (<i>Cargo / Título</i>)</p>	
<p>1.b: If Business Owner (<i>Se dono da empresa</i>):</p> <p>Name of Company (<i>Nome da empresa</i>)</p> <p>Business Address (<i>Endereço comercial</i>)</p> <p>Description of Business (<i>Descrição do negócio</i>):</p> <p>Percentage held (<i>percentagem de participação detida</i>):</p> <p>Geographic areas covered by your company (<i>Áreas geográficas abrangidas pela sua empresa</i>):</p> <p>Website</p>	
<p>1.c: If retired or investor (<i>Se aposentado ou investidor</i>)*</p> <p>List your major holdings and locations (<i>Liste suas participações importantes e locais</i>)</p> <p>How were these investments funded? (<i>Liste suas participações importantes e locais</i>)</p>	<p>Business owner (<i>please complete 1.b</i>)</p> <p>Employment (<i>please complete 1.a</i>)</p> <p>Inheritance (<i>please provide information below</i>)</p>

** Please provide supporting documentation (e.g. tax returns, financial statements, bank statements or other details).
Por favor, forneça a documentação de apoio (por exemplo, os retornos fiscais, demonstrações financeiras, extratos bancários ou outros detalhes).*

Section IV: Declaration and Undertakings

1. I declare that the information provided in this form is, to the best of my knowledge and belief, accurate and complete.

Declaro que as informações fornecidas no presente formulário são, para o melhor de meu conhecimento e crença, precisas e completa.

2. I undertake to advise the recipient promptly and provide a new "Declaration of Status" form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete.

Comprometo-me a informar o destinatário prontamente e fornecer uma nova "Declaração de Tax Status" forma dentro de 30 dias em que qualquer alteração nas circunstâncias ocorre que faz com que qualquer uma das informações contidas no formulário a ser imprecisas ou incompletas.

3. I understand that tax implications are complex and that I am responsible for obtaining all relevant tax information and advice as appropriate.

Eu entendo que implicações fiscais são complexas e que eu sou responsável por obter todas as informações relevantes e conselho fiscal, conforme apropriado.

4. I hereby confirm that I have read and fully understand the Dartmouth General Terms and Conditions attached to this form.

Confirmo que li e entender os termos Dartmouth e Condições Gerais anexas ao presente formulário.

5. I confirm that none of the assets I propose to transfer to the structure has been derived from or relate to any of the offenses listed on the Dartmouth General Terms and Conditions attached.

Confirmo que nenhum dos ativos que me proponho a transferir para a estrutura foi derivado de ou relacionadas com qualquer das infrações previstas nos Termos e Condições Gerais Dartmouth anexados.

6. Where legally obliged to do so, I hereby consent to the recipient sharing this information with the relevant tax information authorities.

Onde obrigado legalmente a fazê-lo, eu consente com a compartilhar essas informações com as autoridades de informação fiscal relevante destinatário.

Signature:

Print Name:

Date: (dd/mm/yyyy):

Annex IV: KYC MANDATORY DOCUMENTS

For an individual, the following information:

- (a) Certified copy of a passport, certified by a notary or lawyer;
- (b) Utility Bill or other evidence of address, certified by a notary or a lawyer;
- (c) Bank reference evidencing a relationship of greater than three (3) years;
- (d) Character reference evidencing a relationship of greater than three (3) years;
- (e) Individual Self-certification form;
- (f) Know your Client Form.

For companies, trusts and other entities, the following information:

- a) Constituting documents, be it Memorandum and Articles of Association, Trust Deed, or other document, certified by a notary or a lawyer;
- (b) Register of Directors or other persons controlling the entity, certified by a notary or a lawyer;
- (c) Register of Members, shareholders or beneficiaries, certified by a notary or a lawyer;
- (d) For each director/controller and each shareholder/beneficiary owning more than 10% of the entity, the particulars as described above for each individual;
- (e) Self-certification form;
- (f) Business Activity Form.



Annex V: CONTRACT OF ADHESION

I hereby certify that I have received, read and understood the Dartmouth Group Compliance Manual and confirm that I have full knowledge of all of the Policies and Procedures set forth herein.

I undertake to comply with it fully , confirming my knowledge of the sanctions applicable to each of the cases of violation of the Policies contained in this Manual.

I am aware that the use of information and information systems of the company is monitored, and that the records thus obtained may be used to detect violations of the Policy and, as the case may be, serve as evidence in administrative and judicial proceedings;

I am in agreement with the whole content of the Policy and I am responsible for the noncompliance with any obligation therein, by action or omission;

I declare that I have read and fully accept the terms and rules of the Policy, expressing total agreement and unrestricted adherence to the aforementioned terms and rules, on which I declare that I have no doubt.

Date:

Signature:



Annex VI: DECLARATION OF ATTENDANCE TO COMPLIANCE TRAINING

I attest to have participated in the Dartmouth Group Compliance training during the dates
....., under the terms of the Dartmouth Group Training Policy.

Date

Signature



Annex VII: REPRESENTATIVE CONTRACT OF ADHESION

_____, a company
incorporated under the laws of _____, that under contract represent
the Dartmouth Group in the country of _____, hereby adhere
to the Dartmouth Group Compliance Policies and accept full responsibility to adapt
these procedures to local regulations as well as train all staff in the Dartmouth group
Compliance Program.

Date

Signature