



### 3.2.(1) - Procedure for Using the Complaint Channel

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## Procedure for Using the Complaint Channel

### Banco KDB do Brasil S.A.

#### 1. General Provisions

1.1. This Procedure for Using the Complaint Channel of Banco KDB do Brasil S.A. (“**Procedure**”) provides the guidelines for the correct and appropriate use of the complaint channel (“**Complaint Channel**”) of Banco KDB do Brasil S.A. (“**Banco KDB Brasil**”), in compliance with Resolution CMN No. 4.859, of October 23, 2020. The purpose of this Procedure is to ensure compliance with the laws, rules and regulations on the availability of a channel for communicating signs and suspicions of illegality, abuse, irregularities and fraud related to the financial institution’s activities.

#### 2. What is a Complaint Channel?

It is a communication channel through which the Complainant (as defined below) can communicate, without the need to identify himself/herself, situations with signs of illegality of any nature, related to the financial institution's activities. Banco KDB Brasil is committed to the use of adequate, confidential and free means of communication for such purpose.

##### 2.1. The Complaint Channel:

The Complainant may report any suspicious irregularities by using one of the following means:

Website:

[www.bancokdb.com.br](http://www.bancokdb.com.br) > Contact us > Reporting Channel

E-mail: [compliance@bancokdb.com.br](mailto:compliance@bancokdb.com.br)

#### 3. Who can file complaints?

This Procedure applies to the following individuals (“**Complainants**”):

- ✓ Employees, collaborators and management, at all hierarchical levels;

- ✓ Customers;
- ✓ Users;
- ✓ Partners; or
- ✓ Suppliers and Service Providers of Banco KDB Brasil.

Complainants do not need to identify themselves, but may do so if they wish. Their identity will be safeguarded anyway.

The use of the Complaint Channel must always be based on the principle of good faith and the Complainant shall not suffer any retaliation.

Banco KDB Brasil follows all the guidelines of the General Data Protection Law (LGPD) and any other laws that guarantee the privacy of information.

#### **4. What can be reported?**

**4.1.** Complainant may report, either anonymously or not, any imminent violation or suspicious conduct involving Banco KDB Brasil that has already occurred, is ongoing or may be consummated in the near future, with respect to:

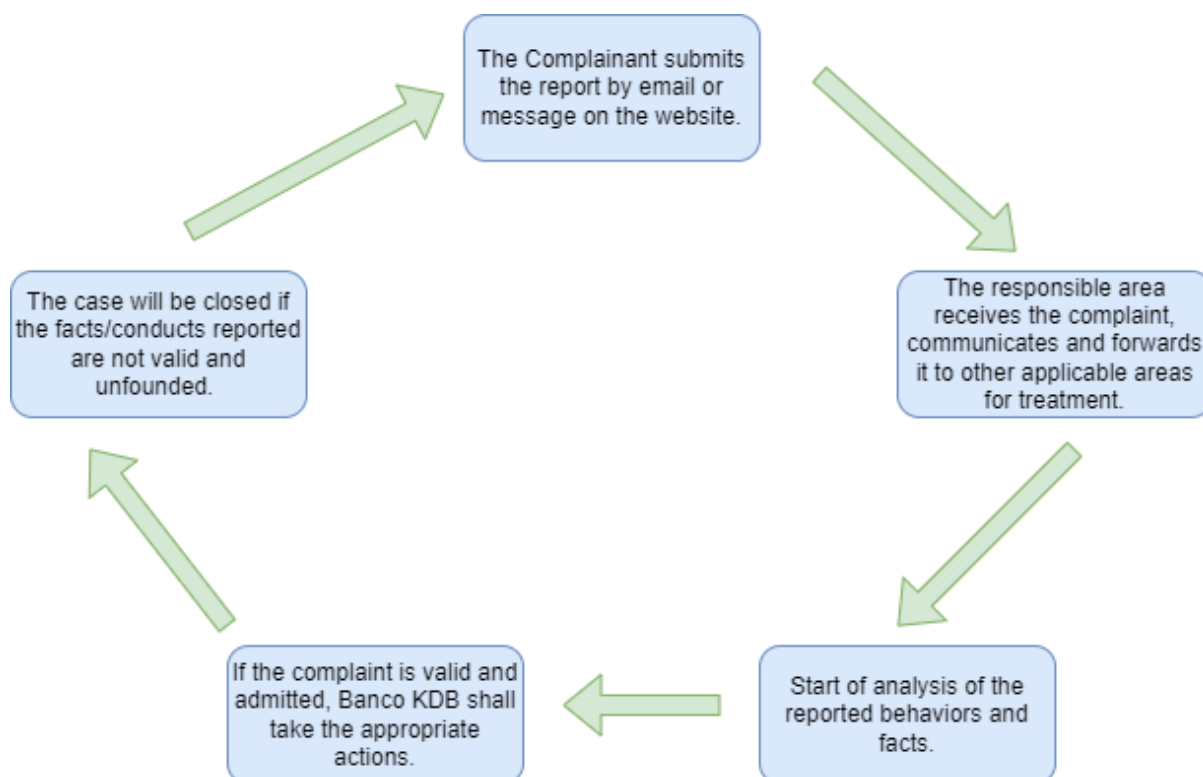
- ✓ Situations of irregular practices and contrary to the interests of Banco KDB Brasil;
- ✓ Fraud, scams and/or illicit acts including, but not limited to, money laundering, terrorist financing, market abuse, breach of client confidentiality or non-disclosure agreements, theft, stealing, corruption or bribery;
- ✓ Misuse of confidential information and data, as well as privileged information;
- ✓ Violation of current legislation, regulations or rules of supervisory bodies applicable to Banco KDB Brasil;
- ✓ Non-compliance with rules, policies and/or internal procedures of Banco KDB Brasil;
- ✓ Frequent or customary violation, intentionally, of any rules, policies and/or internal procedures of Banco KDB Brasil;
- ✓ Security failures in the facilities, information security, misuse of the image, name, brand or any form of identification of Banco KDB Brasil;
- ✓ Damage to the environment;
- ✓ Use and/or sale of drugs and narcotics;
- ✓ Bad and/or unethical behaviour including, but not limited to, any form of harassment, aggression, racism, any type of violence or any form of discrimination;
- ✓ Misconduct or bad professional conduct;

- ✓ Lack of decorum;
- ✓ Any practices considered abusive.

**4.2.** The Complaint Channel is secret, confidential, free and impartial, so that reports can be made anonymously and all information provided will be treated with the utmost confidentiality by Banco KDB Brasil and those responsible for analysing the reported conduct.

**4.3.** Employees and collaborators of Banco KDB Brasil who make any communications about alleged irregularities must also keep the fact that they made the complaint, as well as the details of the communication and any feedback given to them about the case by the person responsible for the Channel, in absolutely secrecy.

## 5. Dealing with the Complaint - Work Flow



### 5.1. Filling the Complaint

The Complainant accesses the Complaint Channel, as previously indicated, and reports the facts in a clear, objective and in the most detailed manner as possible, and is encouraged to send documents that are important for the investigation process. This will facilitate the reception, analysis and investigation of the facts.

The complaint can be sent by message by accessing the website page of Banco KDB Brasil and by clicking on “CONTACT US” and then on “REPORTING CHANNEL”:

> Contact us > Reporting Channel

If the Complainant prefers, the message may be forwarded to the following email address:

[compliance@bancokdb.com.br](mailto:compliance@bancokdb.com.br)

### 5.2. Receipt of the Complaint

The complaint will be received by the attendant, who will register it, screen it and forward it to the applicable internal areas. Upon receipt of the complaint, the treatment and investigation of the reported facts will begin and the appropriate investigations will be conducted.

The performance in the investigation of the facts will be based on impartiality, discretion and confidentiality, guaranteeing the anonymity of the complaint.

### 5.3. The Analysis of the Facts

The facts will be analysed and investigated and other internal areas may be involved in the process, if necessary. All steps will be recorded in internal reports and kept confidentially.

### 5.4. Valid Complaint

If the investigation concludes that the complaint is valid, Banco KDB Brasil will take the appropriate measures.

If the appropriate complaint involves information that could affect the reputation of:

- (i) controllers and holders of qualifying shareholdings; and

(ii) members of statutory and contractual bodies, then

Banco KDB Brasil shall notify the Central Bank of Brazil within 10 (ten) business days from the date of knowledge of the facts, in accordance with to the conditions set forth under Article 1<sup>st</sup>, sole paragraph and items, of Resolution CMN no. 4.859/2020.

### **5.5. Termination of the Complaint Filling**

If, after the verification and investigation, it is concluded that the reported facts are unfounded and that the complaint is not admitted, Banco KDB Brasil will conclude the investigations and consider the case as terminated.

### **6. Storage of Documents Related to the Complaint Channel**

All documents that are part of the Complaint Channel, as well as internal investigations involving the reported conduct, will be stored for a period of 5 (five) years by the responsible departments, in a way that allows the complete reconstruction of the process to meet the requests of authorities, regulatory bodies and internal and external auditing.

### **7. Associated Legislation / Regulation**

- **Law No. 13.709, of August 14, 2018** - General Personal Data Protection Law (“LGPD”);
- **Resolution CMN No. 4.859, of October 23, 2020**, which establishes procedures for sending information related to the control group members and the management of financial institutions and other institutions authorized to operate by the Central Bank of Brazil and provision about availability of channel for communicating signs of illegality related to the institution's activities.

### **8. Responsible Area and Approval**

The Compliance Department is responsible for drafting, reviewing and updating this Procedure.

The Compliance Department is responsible for coordinating the review process and the Bank's Directors are responsible for its final approval.

## **9. Review Period**

This Procedure shall be reviewed, at least, annually, and may be changed and/or updated in a shorter period, whenever the Bank deems it necessary.

## **10. Final Dispositions**

This Procedure may be amended or modified at any time, independently and without need of prior and express communication.