

ANTI-CORRUPTION AND ANTI-FRAUD POLICY

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1 PURPOSE

The purpose of this Policy is to guide employees of B3 S.A. – Brasil, Bolsa, Balcão and its subsidiaries in Brazil and abroad (Company) on the principles and guidelines that govern their relationship with members and representatives of the Public Administration and Company stakeholders to prevent, identify and combat corruption and fraud practices.

2 APPLICABILITY

This Policy applies to the Company's managers, employees, interns, and service providers.

3 REFERENCES

- United Nations Global Compact;
- United Nations Convention against Corruption;
- Foreign Corrupt Practices Act;
- UK Bribery Act;
- Inter-American Convention against Corruption of the Organization of American States (OAS);
- Federal Law 12,846/2013;
- Decree 8,420/2015;
- CGU Ordinance 909/2015;
- Decree Law 2,848/40 (Penal Code);
- Integrity Program - Guidelines for Private Companies of the Federal Government Disciplinary Board (Corregedoria Geral da União - CGU);

- International Organization for Standardization (ISO) 37001:2016 - Anti-Bribery Management Systems – Requirements with Guidance for Use;
- CMN (Conselho Monetário Nacional) Resolution 3,198/94;
- CVM (Comissão de Valores Mobiliários) Instruction 308/99;
- Code of Conduct;
- Compliance and Internal Controls Policy;
- Whistleblower and Fraud Processing Rule; and
- Anti-Corruption Rule.

4 CONCEPTS

4.1 Fraud

For the purposes of this Policy, fraud is understood as any conduct engaged through the use of artifice, ruse or any other fraudulent means with the intent of concealing facts or gaining undue advantage, such as:

- Falsifying documents, trademarks and products;
- Adulterating results to meet goals, either to obtain positive results or mask negative results;
- Using procedures that directly violate tax laws, with the intent of suppressing or reducing tax or social contribution or any accessory thereof;
- Theft or misuse of financial or non-financial resources for one's own benefit or for the benefit of third parties; and
- Misusing or unduly disseminating financial or non-financial confidential information.

4.2 Corruption

For the purposes of this Policy, corruption is understood as the act of promising, offering or providing, directly or indirectly, an undue advantage to any person or entity, whether public or private. The following also constitute acts of corruption:

- Hampering investigation or inspection required by government bodies, entities or agents, or interfere in their activities, also within the scope of regulatory agencies and oversight bodies of the Brazilian financial system; and
- Practicing any act against the Public Administration that violates the national or foreign public property, any act against the principles of the Public Administration or against the international commitments assumed by Brazil.

4.3 Integrity Program

For the purposes of this Policy, Integrity Program is understood as the set of internal mechanisms and procedures for integrity, for auditing, for encouraging the reporting of irregularities, and for applicability of the Code of Conduct, Policies and Rules with the aim of detecting and correcting deviations, fraud, irregularities, and unlawful acts practiced against the national or foreign Public Administration.

5 GUIDELINES

This Policy encompasses the following guidelines:

- Ensuring the commitment and support from the members of the Board of Directors and its Advisory Committees, the Executive Board, and the Company's Officers (Senior Management) to the fight against corruption and fraud in its various forms;

- Regularly evaluating corporate risks related to the occurrence of acts of corruption and fraud and their respective controls, through its risk management structure, internal controls and compliance;
- Continuously communicating the Company's values and commitments in its fight against corruption and fraud, as well as disseminating its whistleblower channels through communication campaigns and training;
- Ensuring the autonomy and independence of the Internal Control, Compliance and Corporate Risk Department (DCR), which is responsible for the Integrity Program; and
- Continuously overseeing procedures related to the Integrity Program in order to identify possible improvement opportunities.

6 GENERAL GUIDANCE

6.1 Prohibition

Managers, employees, interns, or service providers are prohibited of practicing or allowing any form of corruption or fraud.

6.2 Reporting suspect situations

Under the terms of the Code of Conduct and the Whistleblowing and Fraud Processing Rule everyone must report suspect situations of fraud, corruption, or any situations that require special attention from the Company, to the whistleblower channels, assuring the confidentiality of the information provided.

6.3 Additional measures to prevent and combat corruption

When dealing with services and activities more sensitive to acts of corruption, the procedures and responsibilities described in the Anti-Corruption Norm must also be observed.

The Audit Committee (COAUD) should be notified of acts of corruption and fraud, regardless of their relevance.

6.4 Additional measures to prevent and combat fraud

The Integrity Program must comprise monitoring the procedures for the Company's critical processes, through indicators, identifying and mitigating fraud risks.

The Integrity Program should also comprise internal auditing procedures in accordance with the Annual Internal Auditing Plan and annual independent audit of the Company's individual and consolidated financial statements.

In the course of these procedures, cases of fraud, corruption or other unlawful acts must be reported to the Code of Conduct Committee, such as:

- Changes or omissions of documents, data and financial information and accounting records;
- Grant of undue advantages, benefits or privileges to any person or entity, whether public or private;
- Misuse or theft of financial or non-financial resources;
- Misuse or undue disclosure of financial or non-financial information confidential; and
- Practice of any act contrary to Brazilian applicable laws or to the provisions of the Code of Conduct as well as internal policies and rules of the Company.

All the cases of fraud and corruption, regardless of their relevance, that are reported to the Code of Conduct Committee and that are related, according to the applicable regulation, to the matters listed below, shall be reported to the Audit Committee:

- Non-compliance with legal and regulatory rules, which may jeopardize the Company's continuity;

- Activities undertaken by the Company's management, regardless the amount;
- Activities undertaken by Company's employees or interns, as well as service providers; and
- Mistakes that result in inaccuracies in the Company's financial statements.

7 RESPONSIBILITIES

7.1 Senior Management

- Demonstrates its commitment and support to the Integrity Program, adhering to and supervising procedures to combat corruption and fraud, disseminating the Company's values and commitments.

7.2 Internal Controls, Compliance and Corporate Risk Department

- Oversees and ensures compliance with the guidelines and standards contained in this Policy;
- Regularly evaluates the risks related to the occurrence of acts of corruption and fraud and their respective controls, reporting them, whenever necessary, to the Senior Management;
- Implements, monitors and reviews the Integrity Program, in conjunction with the Legal Department, improving it according to existing risks or new risks that may be identified; and
- Notifies the Audit Committee of the occurrence of acts of corruption and fraud, pursuant to items 6.3 and 6.4. of this Policy.

7.3 Legal Department

- Assists in the implementation, monitoring and review of the Integrity Program, improving it according to existing risks or new risks that may be identified.

7.4 Auditing Department

- Audits the Company's areas, following the Annual Auditing Plan;
- Regularly evaluates the effectiveness of the Company's Integrity Program, including recommendations to improve the procedures to fight corruption; and
- Notifies the Audit Committee of any occurrence of acts of corruption and fraud, pursuant to items 6.3 and 6.4. of this Policy.

7.5 Finance Department

- Ensures that the internal control environment mitigates the risk of accounting fraud in compliance with the applicable regulation.

7.6 Code of Conduct Committee

- Evaluates cases of corruption and fraud involving managers, employees, interns, and service providers, under the terms of its bylaws and the Whistleblower and Fraud Processing Rule, reporting them to the Audit Committee through the Auditing Department, when applicable.

7.7 Audit Committee

- Evaluates cases of corruption and fraud, reporting them to the Board of Directors and government bodies, when applicable, in accordance with its bylaws and pursuant to the applicable regulations.

8 FINAL PROVISIONS

The above provisions apply immediately upon the publication of this Policy.

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Areas responsible for the document:

Responsible for:	Area
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	Reporting all fraud and corruption cases to COAUD included	COAUD Recommendation	