



DUE DILIGENCE POLICY

CURITIBA, NOVEMBER 2022.

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DUE DILIGENCE POLICY

glossary and definitions

- **BCB** –Central Bank of Brazil, an autarchy of a special nature, responsible for regulating the National Financial System, with the objective of ensuring the stability and efficiency of the financial system, smoothing fluctuations in the level of economic activity and promoting full employment;
- **Customers/Merchants** –Legal entities domiciled abroad which contract Pay Brokers services such as e-FX;
- **Financial Activities Control Council - COAF** -Financial Intelligence Unit (UIF) of Brazil, the central authority of the system for preventing and combating money laundering, terrorist financing and the proliferation of weapons of mass destruction (PLD/FTP), especially in receiving, analyzing and disseminating financial intelligence information;
- **Financing of terrorism**– Financial support, by whatever means, to terrorism or those who encourage, plan or commit acts of terrorism;
- **Money laundry**– Any operation of concealment or dissimulation of the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense;
- **PLDFT**– Prevention of Money Laundering and Terrorism Financing;
- **Due diligence**–Internal procedure adopted by Pay Brokers, with the aim of getting to know its customers, end users, suppliers and business partners;
- **Final user**: individual with whom Pay Brokers carries out operations on behalf of and at the request of the customer (merchant);
- **list of restrictions**: lists in which companies that have some type of identified irregularity are published,

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such as COAF - Council for the Control of Financial Activities, CEIS - National Register of Disreputable and Suspended Companies, CEPIM - Register of Prevented Non-Profit Private Entities, SIAFI - Budget and Financial Administration System, TCU - Federal Court of Accounts, among others considered necessary for the analyzed case;

- **Operations registration:** existence of a centralized record of all operations carried out by Pay Brokers, with the description of all mandatory minimum information, especially from the

following activities: PIX transfers, deposits, withdrawals, contributions, payments, among other activities;

- **Integrity Risk Degree (GRI)**– Internal integrity due diligence evaluation procedure, consisting of 3 (three) steps: registration form, background check and GRI measurement;
- **SFN** –National Financial System - Set of entities and institutions that promote financial intermediation, that is, the meeting between creditors and resource borrowers.

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1. Introduction

This Pay Brokers Due Diligence Policy aims to protect the company in relation to compliance practices, establishing the principles and operating bases of the internal diligence adopted by the Company in the Know your Client (KYC) procedure, hiring personnel, choosing suppliers, verification of end users and other measures necessary for the due knowledge of third parties.

2. Control of updates to the Due Diligence Policy

TOPIC	DATE	CHANGE
1. Introduction	11/29/2022	Documment emission
2. Control of updates to the Pay Brokers Due Diligence Policy	11/29/2022	Documment emission
3. Coverage	11/29/2022	Documment emission
4. Objectives of this Policy	11/29/2022	Documment emission
5. Precepts and foundations of this Policy	11/29/2022	Documment emission
6. Responsible for this Policy	11/29/2022	Documment emission
6.1. board	11/29/2022	Documment emission
6.2. Compliance and Risk Prevention Committee	11/29/2022	Documment emission
7. Knowing your client	11/29/2022	Documment emission
7.1. Specific guidelines for due diligence	11/29/2022	Documment emission
7.1.1. questionnaire answer	11/29/2022	Documment emission
7.1.2. <i>background check</i>	11/29/2022	Documment emission
7.1.3. List of banned or banned clients	11/29/2022	Documment emission
7.1.4. Customer risk classification - Integrity Risk Degree (GRI)	11/29/2022	Documment emission
7.1.5. Analysis of results	11/29/2022	Documment emission



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7.1.6. Restrictive list with international organizations	11/29/2022	Document emission
7.1.7. negative media	11/29/2022	Document emission
7.1.8. Monitoring of transactions based on the risk of suspicious operations	11/29/2022	Document emission
7.1.9. Summary of the KYC procedure	11/29/2022	Document emission
7.2. Know your employee – Selection of employees and service providers according to Pay Brokers integrity risk	11/29/2022	Document emission
7.3. Getting to know the end user of the Pay Brokers service	11/29/2022	Document emission
8. General provisions	11/29/2022	Document emission
9. Policy Documentation	11/29/2022	Document emission
10. Referenced standards and documents	11/29/2022	Document emission

3. Coverage

This Policy applies to the entire Pay Brokers conglomerate, and its companies in Brazil and abroad. It is Pay Brokers' fundamental duty to comply with this Due Diligence Policy.

In the event of any conflict between this Policy and the local provisions where Pay Brokers' representations abroad are located, the most rigorous standard will prevail, provided there is no violation of local policies.

This Policy also applies to Senior Management, employees, business partners, suppliers and everyone who has direct or indirect business relationships with Pay Brokers.

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4. Objectives of this Policy

The Pay Brokers Due Diligence Policy aims to establish guidelines and guidelines for due diligence during the provision of services, contracting, third party management, monitoring of Pay Brokers clients and end users, in order to prevent and detect the practice of any act that, eventually, may be interpreted as non-compliance with the principles established in its Compliance Program, in the Company's Code of Ethical Conduct and Conduct, in Law n° 12.846/2013 (Anti-Corruption Law), in Presidential Decree n° 11.129/2022 and in other standards relating to corporate integrity.

5. Precepts and foundations of this Policy

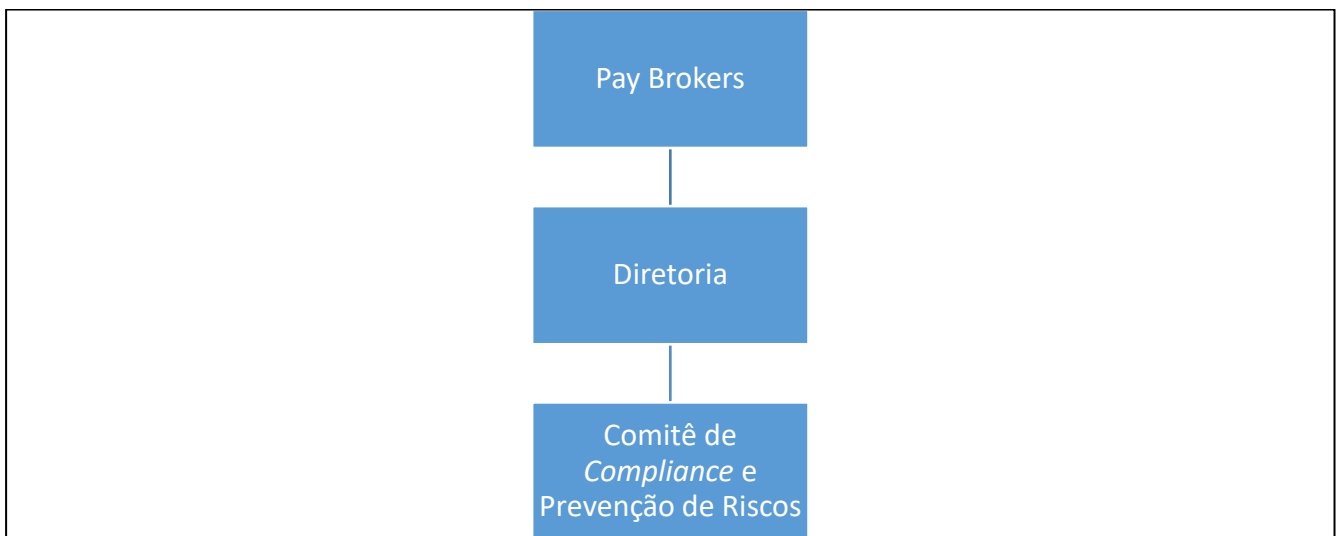
The founding precepts and foundations of this Policy are the following values:

- **Prevention of financial crimes**– Pay Brokers is based on the constant precaution to the occurrence of financial crimes;
- **Approach based on risks** -Pay Brokers will make all its decisions based on a consolidated corporate risk policy;
- **Protection of Pay Brokers' image before the market as a whole**– The policy aims to avoid undue exposure of the organization to undesirable risks, tainting corporate integrity; It is,
- **Implement internal procedures compatible with the size, volume of operations and risk** –Pay Brokers is attentive to internal procedures to prevent corporate integrity risks. In any case, the operation of compliance and due diligence efforts must be compatible with the volume of operations carried out by the Company.

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6. Responsible for this Policy

The Due Diligence Policy has the following responsible for its observance, monitoring and improvement, in the following terms:



6.1. board

Pay Brokers' Executive Board is responsible for approving the institutional guidelines involving the prevention of money laundering, the financing of terrorism and the protection of corporate integrity, especially the rules of due diligence.

The Executive Board also has a key role in constantly monitoring the functioning of mechanisms to prevent money laundering, terrorist financing and protection of corporate integrity. To this end, the Executive Board is directly responsible for supervising strict compliance with the rules and due diligence procedures by Pay Brokers, under the terms set out in this Policy.

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Furthermore, the Board of Pay Brokers is responsible for providing material and human resources for the proper functioning of this policy and the organization's entire effort to prevent money laundering and terrorist financing.

The Executive Board is also responsible for the constant monitoring of situations of non-compliance with this policy and will provide guarantees that the Compliance and Risk Prevention Committee takes appropriate measures for the correct treatment of situations that come to its attention.

6.2. Compliance and Risk Prevention Committee

The Compliance and Risk Prevention Committee is the body responsible for the direct application of policies to prevent money laundering, financing terrorism and protecting corporate integrity.

The Committee has the following functions:

- a) Supervision and monitoring of situations that require direct action by the agency;
- b) Support and advise the Board of Directors and the Executive Board in the definitions and evaluation of the Policy established herein; It is,
- c) Receiving and dealing with reports of potential non-compliance with this Policy;

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7. Knowing the customer *client - KYC*

The main due diligence procedure adopted by Pay Brokers, when carrying out any negotiation for the intermediation of payments with any potential interested party as a client, must verify the regularity of the operations carried out by him.

Before carrying out any business, it is essential to validate the customer's data, by consulting the following mechanisms:

1. Completion of the customer registration form (in Portuguese or English), providing the following information:
 - a. Identification of the location of the headquarters or branch of the interested legal entity;
 - b. Assessment of the client's financial capacity, including income, or billing, if necessary;
 - c. Identification of the partners or final beneficiaries of the legal entity in question, with identification of their personal information such as name, place of residence, personal document, Registration of Individuals;
 - d. Questioning whether any of the partners and/or final beneficiaries are Politically Exposed Persons;
2. Make sure that the customer has a valid, regular and certified license by the Licensing Government Authority, only when the activity carried out by the customer requires authorization to operate;
3. Verification whether the client adopts compliance or corporate integrity mechanisms;

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4. Make sure that the service contract contains the requirements regarding the need to comply with the PLDFT Policies.
5. Conduct consultation with the registration bodies available to Pay Brokers.

7.1. Specific guidelines for due diligence

7.1.1. questionnaire answer

The due diligence process comprises three stages, namely: (a) application of the questionnaire; (b) background check; and, (c) measurement of the Integrity Risk Degree (GRI).

The first item to be answered by the potential customer (merchant) is the form/questionnaire with your basic information.

Potential clients must complete a questionnaire and forward any evidence that may be requested by Pay Brokers, after analyzing the answers that will allow the Company to identify possible risks related to the contract, as well as assist in the management of contracted parties.

The questionnaire must be applied to potential suppliers, service providers and other partners before hiring.

For current contractors, the questionnaire must be applied every 1 (one) year, or on demand, to be carried out at any time, renewing, in this case, the validity of the diligence.

Upon receipt of the questionnaire and the supporting evidence presented, Pay Brokers will carry out research using open sources and/or using internal systems, with a view to complementing and/or attesting to the veracity of the information provided.

7.1.2. background check

Pay Brokers will carry out a detailed background check analysis of the Company's potential partners.

- **company profile**: aspects of number of employees will be evaluated; the complexity of the organizational structure, the market sector in which it operates, the countries in which it operates, directly or indirectly, the number and location of legal entities that make up the same economic group; the framing of the size of the company;
- **Relationship with the Government**: the degree of interaction between the company, members of its senior management, partners and other legal entities that form part of the same economic group with the public sector will also be analysed; the number of authorizations, licenses, government permissions for the company's operations, participation in bidding procedures and the execution of administrative contracts. For this purpose, specific national or international registers can be consulted that demonstrate possible restrictions for the execution of public contracts and/or with governmental entities, such as, for example, the National Register of Punished Companies (CNEP) and the Register of Disreputable and Suspended Companies. (CEIS);
- **History and Reputation**: the following aspects will also be considered: the history of involvement of the company, members of its senior management, its partners and other legal entities that form the same economic group in

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cases of ethical deviations, fraud, corruption and money laundering money. Research will also be carried out that include, but are not restricted to, open sources, specialized database, company website, Transparency Portal, Lists of Sanctions, Impediments and other search engines available to Pay Brokers;

- **Adoption of integrity/compliance mechanisms:** (1) commitment from the corporate top management, including the boards, evidenced by visible and unequivocal support for the program, as well as the allocation of adequate resources; (2) standards of conduct, code of ethics, integrity policies and procedures, applicable to all employees and managers, regardless of position or function performed; (3) standards of conduct, code of ethics and integrity policies extended, when necessary, to third parties, such as suppliers, service providers, intermediary agents and associates; (4) periodic training and communication actions about the integrity program; (5) adequate risk management, including its periodic analysis and reassessment, to carry out necessary adaptations to the integrity program and the efficient allocation of resources; (6) accounting records that fully and accurately reflect the entity's transactions; (7) internal controls that ensure the prompt preparation and reliability of reports and financial statements of the legal entity; (8) specific procedures to prevent fraud and illicit acts within the scope of bidding processes, in the execution of administrative contracts or in any interaction with the public sector, even if intermediated by third parties, such as payment of taxes, subjection to inspections or obtaining authorizations, licenses , permits and certificates; (9) independence, structure and authority of the internal body responsible for implementing the integrity program and overseeing its compliance; (10)

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channels for reporting irregularities, open and widely publicized to employees and third parties, and mechanisms for handling complaints and protecting bona fide whistleblowers; (11) disciplinary action for integrity program violations; (12) procedures that ensure the prompt interruption of detected irregularities or infractions and the timely remediation of the damage caused; (13) appropriate, risk-based steps to: (a) contract and, as the case may be, supervise third parties, such as suppliers, service providers, intermediary agents, forwarders, consultants, sales representatives and associates; (b) hiring and, as the case may be, supervision of politically exposed persons, as well as their families, close collaborators and legal entities in which they participate; and, (c) carrying out and supervising sponsorships and donations; (14) verification, during mergers, acquisitions and corporate restructuring processes, of the commission of irregularities or illicit acts or the existence of vulnerabilities in the legal entities involved; and, (15) continuous monitoring of the integrity program with a view to its improvement in preventing, detecting and combating the occurrence of harmful acts provided for in art. 5 of Law No. 12,846 of 2013. acquisitions and corporate restructurings, the commission of irregularities or illicit acts or the existence of vulnerabilities in the legal entities involved; and, (15) continuous monitoring of the integrity program with a view to its improvement in preventing, detecting and combating the occurrence of harmful acts provided for in art. 5 of Law No. 12,846 of 2013. acquisitions and corporate restructurings, the commission of irregularities or illicit acts or the existence of vulnerabilities in the legal entities involved; and, (15) continuous monitoring of the integrity program with a view to its

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improvement in preventing, detecting and combating the occurrence of harmful acts provided for in art. 5 of Law No. 12,846 of 2013.

When necessary to clarify or supplement any information obtained at any stage of the procedure, the company may be required to provide other documents and information that prove the existence of mechanisms for preventing, detecting and correcting irregularities and acts of corruption, in line with anti-corruption legislation. applicable.

7.1.3. List of banned or banned clients

Secondly, Pay Brokers must make sure that the client, its partners and/or final beneficiaries do not have any type of business restriction or appear as sanctioned before any entity at national or international level.

For this, the following Brazilian databases must be consulted, in case any legal entity and/or partner has:

Documentation to be searched	access link
1) Regular consultation with the National Register of Legal Entities before the Federal Revenue of Brazil	https://bit.ly/2XDvIam
Consultation of federal, state and municipal tax regularity (at the company's domicile)	
2) Federal	https://bit.ly/3c5I53O
3) State (at the company's domicile)	https://bit.ly/3gsy8AS
4) Municipal (in the case of Curitiba)	https://bit.ly/36wCd2B
5) National Register of Civil Convictions for Acts of Administrative Improbability and Ineligibility of the National Council of Justice	https://bit.ly/2ZzUV86
6) Certificate of Labor Regularity	https://bit.ly/3eIKyJ1

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7) National Register of Disreputable and Suspended Companies - CEIS	https://bit.ly/2TGxoyF
8) National Register of Punished Companies - CNEP	https://bit.ly/2XuHQKI
9) Negative Certificate of Proceedings at the Federal Court of Accounts	https://bit.ly/2ZE9Yxv
<p>10) Internet reputation research through search engines, with the following words:</p> <ul style="list-style-type: none"> • “company name+corruption”; • “company name+bribe”; • “company name+fraud”; • “company name+investigation”; • “company name+crime;” • “company name+public civil action”; • “company name+administrative misconduct”; It is, • “company name+money laundering”. 	
<p>11) Reputation survey of partners and/or final beneficiaries on the internet through search engines, with the following words:</p> <ul style="list-style-type: none"> • “partner name+corruption”; • “partner name + bribe”; • “member name +fraud”; • “partner name +investigation”; • “partner name +crime;” • “partner name + public civil action”; • “partner name + administrative misconduct”; It is, • “partner name + money laundering”. 	

Pay Brokers will be able to contract external tools to consult any restrictions at an international level, such as the World Bank, the Financial Action Group (GAFI/FATF), among others.

7.1.4. Customer risk classification - Integrity Risk Degree (GRI)

The assessment of the due diligence questionnaire, together with the evidence presented and the background check analysis, will result in the classification of the company

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into four risk levels, called Integrity Risk Degree (GRI), which are subdivided into: low, medium no risk factor, medium with risk factor and high.

Level 1 customer –**low risk**- Has a high level of governance

If risk factors are not identified in the documentation analysis and background check, an Integrity Risk Degree (GRI) will be assigned, according to the criteria set out below.

Low: the company will have the GRI classified as low if it presents sufficient documentary evidence to prove the existence and application of mechanisms for the prevention, detection and correction of irregularities and acts of corruption.

Level 2 customer –**medium risk**– It has an average level of governance, subdivided into: medium without risk factor and medium with risk factor

Average: the company will have the GRI classified as medium, depending on its profile, if it does not present sufficient documentary evidence to prove the existence of mechanisms for the prevention, detection and correction of irregularities and acts of corruption or if it presents sufficient documentary evidence to prove the existence , however, not the application of such mechanisms.

If risk factors are identified in the documentation analysis and background check, an Integrity Risk Degree (GRI) will be assigned.

Level 3 customer –**high risk**– It has a low level of governance.

High:the risk will be classified as high depending on the quantity and nature of the risk factors identified and if the company does not present sufficient documentary evidence to

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prove the existence and application of mechanisms for the prevention, detection and correction of irregularities and acts of corruption.

For the purpose of parameterizing the risks of merchants that operate with sports betting and/or games of chance, the operation of the following authorization licenses is considered as indicative of the customer risk benchmark:

- **low risk**– License operation in Malta and United Kingdom;
- **medium risk**– Operating a license in Curaçao or operating a sub-license (White-label license); It is,
- **high risk**– Operation license in Costa Rica.

7.1.5. Analysis of results

The verification of the results obtained through the previous steps will be carried out by the unit responsible for the Compliance and Risk Prevention Committee, which will provide an opinion on the recommendation on contracting or maintaining the contract.

The opinion issued must present justifications for the approval of the third parties submitted to the verifications, sending recommendations to the requesting unit on possible measures to be adopted to mitigate the risks related to the performance of the third party.

7.1.6. Restrictive lists with international organizations

Pay Brokers will carry out a detailed check with international databases to certify the regularity of the operations of both the potential company interested in having services provided by Pay Brokers, as well as the respective partners and final beneficiaries.

As previously highlighted, it is recommended to carry out research in a database system that brings together an international database.

7.1.7. negative media

Pay Brokers will undertake research into the existence of negative media on behalf of the company or its respective partners, which may blemish the continuity of the relationship with the Conglomerate as a whole.

7.1.8. Monitoring of transactions based on risks and suspicious operations

After the due classification of the client based on the risks of the projects, Pay Brokers will promote the respective monitoring of transactions, prioritizing the inspection of clients considered to be at risk **high, average** It is **low**.

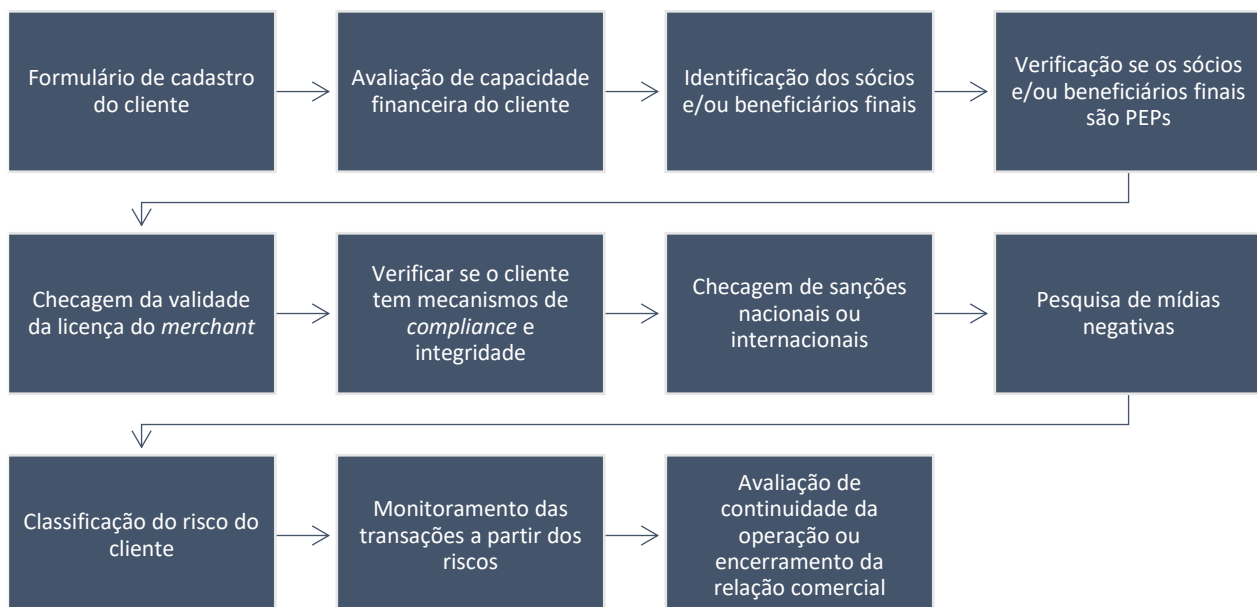
Every 3 (three) months, reports will be prepared regarding the movements of customers from risk **high**, with the results forwarded to the Board of Directors for assessment of the continuity of the operation or termination of the commercial relationship.

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Every 6 (six) months, reports will be prepared regarding the movements of customers from risk **average**, with the results forwarded to the Board of Directors for assessment of the continuity of the operation or termination of the commercial relationship.

Every 12 (twelve) months, reports will be prepared regarding the movements of customers from risk **low**, with the results forwarded to the Board of Directors for assessment of the continuity of the operation or termination of the commercial relationship.

7.1.9. Summary of the KYC procedure



7.2. Know your employee – Selection of employees and service providers according to Pay Brokers integrity risk

Pay Brokers will take steps to hire employees and service providers that are compatible with the respective risk of money laundering or even with the nature of the services provided by Pay Brokers.

When carrying out internal diligences, the rights and guarantees of the holders of personal data must be respected, such as consent and the determined purpose, under the terms of art. 5, XII, of the General Data Protection Law (LGPD).

Consultation of criminal records and credit protection services is not recommended, being restricted to activities in which the employee justifies caution. Furthermore, the procedure will be evaluated on a case-by-case basis, depending on the nature of the activities performed by the employee.

7.3. Getting to know the end user of the Pay Brokers service

Pay Brokers, whenever possible, will take steps to obtain basic information about the final beneficiary of its services, beneficiary of the values, at the request of the customer (merchant).

It is certainly impossible to obtain detailed information about all end users of Pay Brokers services, however, it is essential to carry out the following activities:

1. Make sure that the end user's registration is duly updated and compatible with the information obtained from the Federal Data Processing Service;
2. Registration information of the end user of the Pay Brokers service; It is,

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3. Check the use of the PIX key through the CPF modality.

Pay Brokers will not be able to transfer funds in favor of final beneficiaries whose CPF Registration with the Federal Revenue Service of Brazil appears as suspended, canceled or written off.

8. General provisions

This Policy was approved by the Executive Board of Pay Brokers on November 11, 2022, and its disclosure must be promoted internally, without external disclosure, in view of the existence of information of a restricted nature in this document.

9. Policy documentation

Pay Brokers will document together with the company's files, making the respective Policy available to all interested parties on its website and internal network, without prejudice to the non-disclosure of documents considered confidential.

Elaboration/Revision Clovis Alberto Bertolini de Pinho Ricardo de Paula Feijó	verified and approved Edson Antonio Lenzi Filho	Version 02 - 11/29/2022 Policy issued on 11/29/2022
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10. Referenced standards and documents

- 1) Law nº 9.613/1998 - Provides for the crimes of "laundering" or concealment of assets, rights and values; the prevention of the use of the financial system for the illicit activities foreseen in this Law; creates the Financial Activities Control Council - COAF, and takes other measures;
- 2) Presidential Decree No. 11.129/2022 - Regulates Law No. 12,846, of August 1, 2013, which provides for the administrative and civil liability of legal entities for the practice of acts against the public administration, national or foreign, especially art. 57, XIII et seq.
- 3) Circular No. 3,978/2020, of the Central Bank of Brazil - Provides for the policy, procedures and internal controls to be adopted by institutions authorized to operate by the Central Bank of Brazil in order to prevent the use of the financial system to commit crimes of "laundering" or concealment of assets, rights and values, dealt with in Law No. 9,613, of March 3, 1998, and the financing of terrorism, provided for in Law No. 13,260, of March 16, 2016;
- 4) BCB Resolution No. 65, of 01/26/2021 – Provides for the compliance policy of consortium administrators and payment institutions;
- 5) Pay Brokers Code of Ethics and Conduct;
- 6) Pay Brokers Money Laundering and Terrorism Financing Prevention Policy;
- 7) Pay Brokers Anti-Corruption Policy;
- 8) Pay Brokers Due Diligence Policy;
- 9) COAF Resolution No. 40, of November 22, 2021 - Provides for procedures to be observed, in relation to politically exposed persons, by those who are subject to the supervision of the Financial Activities Control Council (Coaf) pursuant to § 1 of art. . 14 of Law No. 9.613, of March 3, 1998.



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10) Law No. 13,260, of March 16, 2016 - Regulates the provisions of item XLIII of art. 5 of the Federal Constitution, regulating terrorism, dealing with investigative and procedural provisions and reformulating the concept of terrorist organization; and amends Laws No. 7,960, of December 21, 1989, and 12,850, of August 2, 2013.