



# ANTI-CORRUPTION, ANTI-BRIBERY AND RELATIONSHIP WITH PUBLIC AUTHORITIES POLICY

CURITIBA, NOVEMBER 2022.

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## *ANTI-CORRUPTION, ANTI-BRIBERY AND RELATIONSHIP WITH PUBLIC AUTHORITIES 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

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identified irregularity are published, 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 Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy, by providing for encouraged and prohibited conduct in the development of Pay Brokers' business activity, supports the adoption of the highest standard of integrity and transparency within the Company.

In this sense, it must be stated that this document, by integrating the Pay Brokers Integrity Program, complements and develops the provisions set forth in the Company's Code of Ethics and Conduct.

Thus, by instituting this Policy, Pay Brokers affirms its commitment to promoting a corporate environment that prevents any practices of corruption and/or bribery.

It is recommended that this Policy be known and its provisions be applied by the Company's managers, employees and suppliers, along with the other provisions established by the Pay Brokers Compliance Program.

### 2. Control of updates to the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy

Topic	Date	Change
1. Introduction	11/29/2022	Document emission
2. Control of updates to the Anti-Corruption Policy and Relationship with Public Authorities	11/29/2022	Document emission
3. Coverage	11/29/2022	Document emission
4. Objectives of this Policy	11/29/2022	Document emission
5. Precepts and foundations of this Policy	11/29/2022	Document emission
6. Responsible for this Policy	11/29/2022	Document emission

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6.1. board	11/29/2022	Documment emission
6.2. Compliance and Risk Prevention Committee	11/29/2022	Documment emission
7. Provisions of the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy - Parameters of conduct - General Guidelines - Prohibition of bribery	11/29/2022	Documment emission
7.1. free gifts policy	11/29/2022	Documment emission
7.2. Donations and sponsorships	11/29/2022	Documment emission
7.3. Activation of attention points (red flags)	11/29/2022	Documment emission
7.4. Relationship with public authorities	11/29/2022	Documment emission
7.5. Relationship with suppliers	11/29/2022	Documment emission
8. Complaints, investigations and sanctions for non-compliance with this policy	11/29/2022	Documment emission
9. Financial resources and maintenance of the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy	11/29/2022	Documment emission
10. Internal follow-up, review and retests	11/29/2022	Documment emission
11. Summary of the complaints procedure	11/29/2022	Documment emission
12. normative references	11/29/2022	Documment emission
13. General provisions	11/29/2022	Documment emission
14. Policy Documentation	11/29/2022	Documment 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 Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy.



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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.

### **4. Objectives of this Policy**

The institution of this Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy reveals the commitment of **Pay Brokers** to ensure the conduct of the business of the **Company** ethically and with respect for integrity.

Therefore, any acts that may constitute bribery or corruption are repudiated and absolutely discouraged by **Pay Brokers**. This commitment constitutes one of the fundamental pillars of the company's relations **Company** in the market, proving to be a relevant precept that is part of the Compliance Program of **Pay Brokers**.

It is therefore recommended to read the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy together with the Code of Ethics and Conduct of **Company**, supporting the knowledge and application of all provisions of the Pay Brokers Integrity Program.

This Policy aims to establish parameters and guidelines to be practiced by the Company's members in order to combat and prevent behavior that may characterize corruption or bribery, describing prohibited conduct recommended by Pay Brokers.

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To achieve this objective, the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy prescribes guidelines for the Company's employees, managers and suppliers, as well as provides for reporting mechanisms and sanctions provided for the purpose of preventing the practice of bribery or corruption in conducting the Company's business.

This Policy is based on the legal dictates related to the subject, namely, Law No. 12,846/2013 and Presidential Decree No. 11,129/2022. In addition, it is based on recommendations issued by national reference entities, such as ABNT NBR ISO 37001 and NBR ISO 37301.

Integrating, therefore, the Pay Brokers Compliance Program, this document institutes directive instructions to ensure that ethical and upright standards of conduct are adopted within the Company.

### **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,

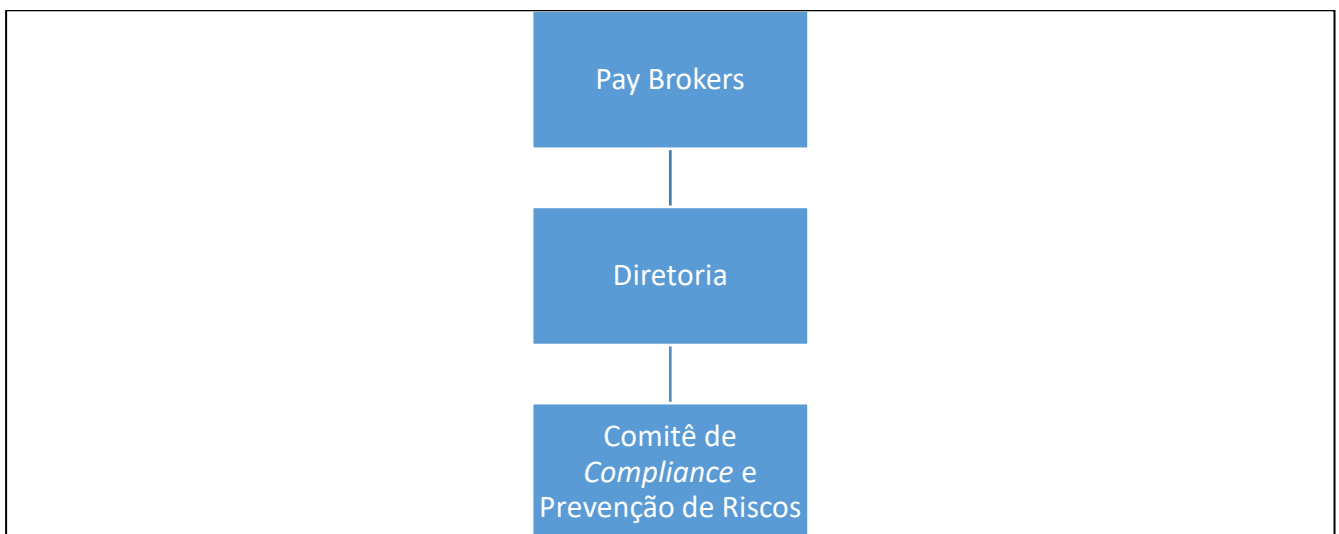


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- Implement internal procedures compatible with the size, volume of operations and risk –Pay Brokers is attentive to internal procedures to prevent corporate integrity risks.

### 6. Responsible for this Policy

The anti-corruption, anti-bribery and relationship system with public authorities will be coordinated and conducted by the Pay Brokers Board of Directors and the Compliance and Risk Management Committee, similarly to the leadership of the Integrity Program.



#### 6.1. board

It is incumbent upon Pay Brokers' Board of Directors to approve the institutional guidelines involving the prevention of money laundering, the financing of terrorism and the protection of corporate integrity, especially the anti-corruption rules.



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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 anti-corruption procedures by Pay Brokers, under the terms set out in this Policy.

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, terrorist financing and the establishment of anti-corruption provisions.

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.

The Board of Directors is directly responsible for implementing and monitoring the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy, exercising the following duties:

- 1)** Provide means to ensure that this Policy, together with the other mechanisms set out in the Compliance Program that complement it, is implemented and maintained in its entirety;
- 2)** Monitor and monitor compliance with the determinations, recommendations and prohibitions set forth in this document;
- 3)** Promote training to prevent the practice of corruption and bribery at defined intervals;

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4) Review this Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy, updating it according to the Company's specificities and needs over the years;

5) Ensure, together with the Board of Directors, that Pay Brokers will have the necessary resources to properly operate the anti-corruption and anti-bribery management system.

### 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;

It should also be noted that it is the responsibility of the Compliance and Risk Management Committee to discuss any issues or concerns related to full compliance with the measures set out in this Policy.



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The Committee will also manage the reporting channels, receiving information, verifying the need to initiate internal investigations related to corruption and bribery, and conducting them within the scope of the **Company**.

In this regard, the Committee will ensure that the members of the **Pay Brokers** do not suffer any type of retaliation, discrimination or disciplinary action when they provide reports in good faith or based on a reasonable conviction of violation or suspected violation of the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy.

In addition, the Committee has the task of being the spokesperson for this Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy, in order to communicate it throughout the entire field of action of the **Pay Brokers**, both internally and externally, in the relations of **Company** with the market.

The Committee must also keep this Policy up to date and available to all interested parties, communicating it in the appropriate languages within the **Organization**, and also clarifying any doubts arising from the interpretation of this document.

Finally, the Committee must promote acculturation actions, such as holding lectures and preparing booklets, in order to emphasize the importance of the anti-bribery and anti-corruption management system.

Such actions should encourage the use of reporting channels to contribute to the anti-bribery system and to investigate any practices that do not comply with this Policy in the development of the activities of the **Pay Brokers**.

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## 7. Provisions of the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy - Parameters of conduct - General Guidelines - Prohibition of bribery

Based on the best corporate governance practices, Pay Brokers asserts its commitment to combating any practices that may characterize corruption or bribery.

It is for this reason that the Company values strict observance of the rules of conduct and integrity at all its hierarchical levels and in all types of relationships that it establishes in the performance of its activities, which includes relationships with public and private agents and in the fields of national and international action.

In view of this, the following prohibitions are established for Pay Brokers administrators and employees:

- a. Promising, offering or giving, directly or indirectly, an undue advantage to a public official or any undue benefit, or a third party related to him;
- b. Proven to finance, fund, sponsor or in any way subsidize the practice of any unlawful acts;
- c. Provenly, to use an intermediary individual or legal entity to hide or disguise its real interests or the identity of the beneficiaries of the acts performed;
- d. Frustrating or defrauding, through adjustment, combination or any other expedient, the competitive nature of any public bidding procedure;
- e. Prevent, disturb or defraud the performance of any act of any public bidding procedure;
- f. Remove or seek to remove bidders, through fraud or offering of advantage of any kind;
- g. Fraud public bidding or contract arising therefrom;



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- h. Create, fraudulently or irregularly, a legal entity to participate in a public bidding process or enter into an administrative or private contract;
- i. Obtaining undue advantage or benefit, fraudulently, from modifications or extensions

*For the purposes of this Policy, a public agent is understood to be: i) any person who holds a legislative, executive, administrative or judicial position, already designated or sworn in, permanent or temporary, remunerated or honorary, whatever the time of that person in charge; ii) any person who performs a public function, including in a public body or a state-owned company, or who provides a public service, as defined in the domestic legislation of each country; or, iii) any person defined as a "public official" in domestic law.*

of contracts entered into with the public administration, without authorization by law, in the public bidding act or in the respective contractual instruments;

- j. Manipulate or defraud the economic-financial balance of contracts entered into with the public administration;
- k. Hindering the investigation or inspection activity of public bodies, entities or agents, or intervening in their performance, including within the scope of regulatory agencies and supervisory bodies of the national financial system.

The aforementioned prohibitions of behavior extend beyond Pay Brokers' relations with the Government, reaching all fields of interaction of the Company in the development of its activities, including in the private sector, in the relationship with individuals and other market players.



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In this regard, the Company asserts that no administrator or employee of Pay Brokers will suffer any type of discrimination, retaliation or disciplinary action for refusing to take part in any practice that may be characterized as bribery or that may result in an undue advantage, even if such attitude results in delays or loss of business opportunities for the Company.

In this way, Pay Brokers intends, through this Policy, to guarantee transparency and fairness in its relations, reinforcing the importance of observing the provisions present in this document.

### **7.1. free gifts policy**

The offering and receiving of gifts and presents, common in the commercial sphere, contribute to the establishment of good corporate relations, and must be carried out in a spirit of business courtesy.

Gifts and gifts are understood to be sporadic souvenirs, offered in an institutional order and in a generalized way, in periods of festivities or commemorative events, such as pens, diaries, calendars, books and other gifts usually used in the market.

In this sense, such practice is allowed as long as it does not aim to generate in the person who receives them any actions that could constitute an undue advantage or reward for the practice of action or omission of conduct.

In this way, and in accordance with the provisions of item 3.1.1. of the Pay Brokers Code of Ethics and Conduct, on occasions both when offering and receiving gifts and gifts, employees, partners and suppliers of Pay Brokers **Company** must analyze the following aspects:



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- 1) Make sure that gifts and gifts are received by institutional or publicity order, since they are only allowed in these two cases;
- 2) Check whether the gift or giveaway has an exorbitant value or capable of causing a situation of conflict of interests, using reasonableness and proportionality as a situational assessment criterion; It is
- 3) Observe whether the gift exceeds the maximum value of R\$ 500.00 (five hundred reais), US\$ 300.00 (three hundred US dollars) and/or € 300 (three hundred Euros)

The Compliance and Risk Prevention Committee must be consulted when offering any gifts or gifts, which must be contacted by email [compliance@paybrokers.com.br](mailto:compliance@paybrokers.com.br), who will evaluate the case, guiding the best way to act in the context.

### **7.2. Donations and Sponsorships**

Donations and sponsorships must be made in a transparent manner, being previously documented, approved and made only for legitimate reasons for the purpose of the donation and sponsorship, such as serving humanitarian interests in support of cultural and educational institutions and seeking appreciation and knowledge of the Company.

Donations and sponsorships will be carried out with the highest standards of transparency, integrity and legality. Donations and sponsorships are prohibited from being offered, promised or granted with the purpose of obtaining an improper advantage or influencing the action of a public agent.



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Any donation and sponsorship promoted on behalf of Pay Brokers must be approved by the Company's Compliance and Risk Prevention Committee, which will issue the agreement or refusal to offer the intended contribution.

In addition, depending on the specific case, there may be a need to carry out the due diligence procedure in relation to the recipient of the donation and/or sponsorship, in order to verify its integrity and suitability to receive the intended contribution, under the terms of the Policy of Due diligence.

### **7.3. Activation of attention points (red flags)**

When verifying a possible problematic situation within the scope of Pay Brokers' activities, it is necessary to activate points of attention. Such posture includes the communication, through the reporting channels, of potential non-compliance with the Company's anti-corruption and anti-bribery provisions.

In this sense, for a better understanding and identification of possible occurrences that violate the Pay Brokers anti-bribery system, below is a set of merely illustrative situations for demonstrations of potential suspicious operations or, even, that involve actions that are not in compliance with the Company Integrity Program:

- Payments offered or made exclusively in cash;
- Request for the structuring of a structured transaction with the aim of disguising relevant facts or evading compliance with legal provisions;
- Absence, on the part of the contracted party, of experience, know-how or adequate technique for the execution of the contract;

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- The contractor was recently constituted and does not have technical or professional qualification information compatible with the contractual object;
- Requirement of third-party participation to mediate the execution of a contract or closing of a deal;
- Refusal, by the client, supplier or potential contractor, to comply with the Pay Brokers Integrity Policy, in accordance with the provisions of this Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy, and in accordance with the provisions of the Pay Brokers Code of Ethics and Conduct Pay Brokers, or even within the scope of the service provision agreement; It is,
- Refusal of submission, by the supplier, of documentation requested to carry out due diligence procedures.

In the event of a situation similar to those described above, or in the event of a circumstance that is capable of constituting a violation of the provisions of the Integrity Program - even if not included in the aforementioned exemplary list -, the Company's reporting mechanisms must be activated.

Through this measure, the aim is to guarantee fairness and transparency in the conduct of Pay Brokers' business and activities, values intrinsic to the Company's Compliance Program.



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### 7.4. Relationship with public authorities

Pay Brokers' relationships with public agents must be guided by good faith, integrity and absolute respect, with the offer of any type of undue advantage to any public agent being absolutely prohibited, under the terms of item 3.3.1. of the Company's Code of Ethics and Conduct.

Therefore, all administrators, employees, service providers and suppliers of Pay Brokers must observe that, in the event of demanding any undue advantage or business proposal that does not prove to be compatible with the provisions of the Code of Ethics and Conduct of Pay Brokers, must express their position of not agreeing with the offer of any kind of illicit advantage.

In addition, if an act or omission is verified that violates or has the potential to violate the values of Pay Brokers set forth in its Compliance Program, it is recommended that the event be immediately communicated through the Company's reporting channel and, if applicable, in the competent public body or entity.

In addition, it should be noted that, in meetings, inspections, or any interactions between Pay Brokers and public authorities, it is imperative that at least 2 (two) members of the Company are present, so that it is possible to report the facts in greater detail and precision. in dealings with public officials.

Finally, it is asserted that it is mandatory to adopt the measures contained in this and other documents that are part of the Pay Brokers Compliance Program, as well as the need to comply with the guidelines issued by the Compliance Committee, in order to promote a full, transparent and ethical dealings with public agents and, consequently, with the Public Power in general.

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### 7.5. Relationship with suppliers

More than establishing integrity benchmarks in the organization structure of the **Pay Brokers**, **The Company** considers fundamental the adoption of the values and principles contained in its Compliance Program in its entire scope of action, including the relationship established with suppliers.

In this sense, in order to provide more detail on the dealings of the members of the **Pay Brokers** with suppliers, a Supplier Policy was drawn up, a document that also forms part of the Company's Integrity Program.

The Policy provides for guidelines and guidelines for the proper establishment and conduct of the company's relations **Pay Brokers** with suppliers and business partners. It is recommended, therefore, to read the Pay Brokers Supplier Policy concomitantly with this document.

### 8. Complaints, investigations and sanctions for non-compliance with this Policy

In order to make the anti-bribery system and the Integrity Program as a whole effective, the **Pay Brokers** provides reporting channels for employees and third parties to report irregularities or possible non-compliance within the scope of the activities of the **Company**.



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According to item 5.1.1. of the Code of Ethics and Conduct, the Pay Brokers has an e-mail address for submitting complaints, and it is also possible to report irregularities or settle debts related to Compliance.

Complaints received will be dealt with and investigated impartially by the Compliance Committee, pursuant to the Internal Rules of the Pay Brokers Compliance and Risk Management Committee.

The Compliance and Risk Management Committee may carry out inquiries to determine the facts, take steps to analyze the specific case, verify possible irregularities or non-compliance situations, collect relevant documents, obtain testimonial evidence and request written and signed reports on the case. Such acts must respect the laws in force and legal obligations before the authorities.

In addition, investigations may also be initiated at the request of the Board of Pay Brokers, by means of an official letter.

During the course of the investigations, Pay Brokers administrators, employees and third parties may collaborate with searches for information and evidence, under the supervision of the Compliance and Risk Management Committee, always conducting them in a confidential and confidential manner.

To ensure that investigations are efficient and useful, the Board of Directors will provide all necessary support and assistance to the Compliance and Risk Management Committee.

According to the Internal Rules of the Pay Brokers Compliance Committee, complaints of medium complexity will be discussed and analyzed in a joint effort between the



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Compliance and Risk Management Committee and the respective Directors. Highly complex cases will be forwarded to the Board of Directors for discussion, analysis and resolution.

Under no circumstances will persons involved in the complaint conduct investigations, even if they perform activities in the Company's Management or in the Compliance and Risk Management Committee. In view of this, certain precepts such as discretion, secrecy, professionalism, impartiality and integrity must be observed during investigations, so that the facts are duly investigated and the results effective, maintaining confidentiality.

If the results indicate a violation of this policy, the Compliance and Risk Management Committee will forward the results to the Executive Board, which will analyze and take the measures it deems appropriate. The measures that may be applied by Pay Brokers will be analyzed on a case-by-case basis, depending on who carried out the conduct and its severity, in accordance with item 5.4 of the Code of Ethics and Conduct.

Simultaneously, Pay Brokers will carry out a careful study of its anti-corruption and anti-bribery procedures, to verify whether the case was due to any failure or irregularity.

In addition, the Anti-Corruption and Anti-Bribery Policy must be fully complied with by all, under penalty of disciplinary actions provided for in current laws.

The Compliance and Risk Management Committee has the obligation to document all data collected, referring to complaints, investigations carried out, results and sanctions applied, and periodically send them to the Board of Directors.

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### 9. Financial resources and maintenance of the Anti-Corruption, Anti-Bribery and Relationship with Public Authorities Policy

The provision of human, physical and financial resources necessary to implement, maintain and improve the anti-bribery management system is the responsibility of the Pay Brokers Board of Directors.

The resources that the Board has the duty to coordinate are understood as follows:

- (i) Human Resources: This Policy will have sufficient and qualified personnel for its implementation and maintenance, with members of Pay Brokers highlighted to exercise Compliance functions, regarding anti-bribery and anti-corruption;
- (ii) Physical Resources: Spaces, furniture and equipment will be allocated in order to guarantee the execution of this Policy, in particular for the exercise of the functions of monitoring, investigation and consideration of complaints by the Compliance and Risk Management Committee;
- (iii) Financial Resources: The Board will allocate sufficient budget for the operation of the anti-bribery and anti-corruption management system.

### 10. Internal follow-up, review and retests

The Executive Board is responsible for implementing, maintaining and improving the Anti-Bribery Management System within the scope of the Pay Brokers.



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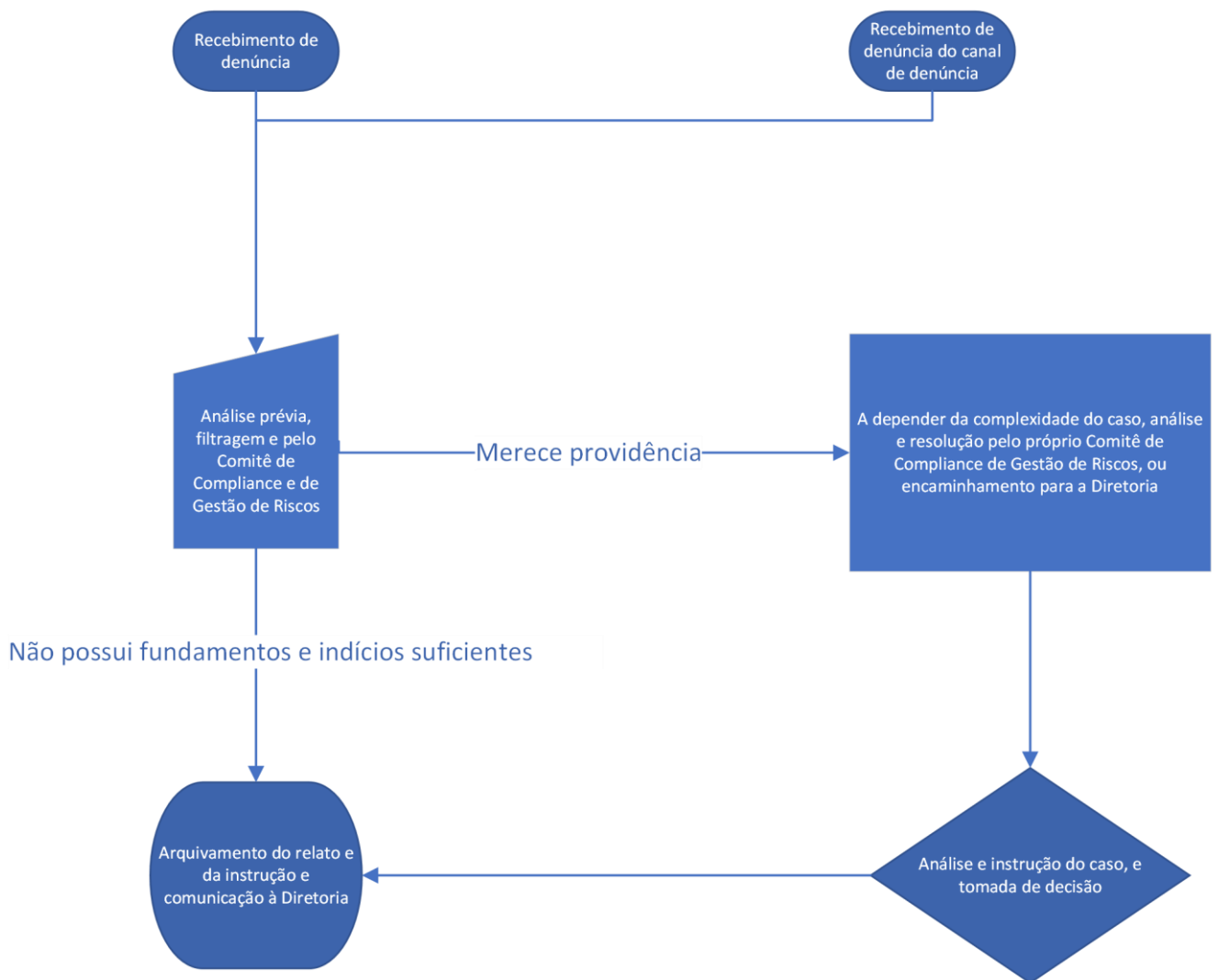
Every six months, the Committee will report to the Board of Pay Brokers the data and results obtained in internal audit. In addition, the reports will include the number of denouncements and cases of non-compliance reported, also presenting a summary of the activities carried out by the Committee during the entire semester.

All steps will be documented by the Risk Management Compliance Committee.



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### 11. Summary of the complaints procedure



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### 12. normative references

The references used in the elaboration process of this Supplier Policy are listed below:

- Law No. 12,846/2013 (Anti-Corruption Law);
- Presidential Decree No. 11,129/2022;
- Ordinance No. 909/2019, of the Federal Comptroller General's Office;
- Good Practices Manual of the Brazilian Institute of Corporate Governance (IBGC);
- ABNT NBR ISO 37.001:2017 – Anti-bribery Management Systems (ISO 37001:2016 – Anti-bribery management systems – Requirements with guidance for use); It is
- ABNT NBR ISO 37.301:2021 – Compliance Management Systems (ISO 37.301:2021 – Compliance management systems – Requirements with guidance for use).

### 13. General provisions

This Anti-Corruption and Relationship with Public Authorities Policy was unanimously approved on October 11, 2022 by the Board of Directors of Pay Brokers.

This version of the Pay Brokers Anti-Corruption and Relationship with Public Authorities Policy will be effective as of October 11, 2022.



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### 14. 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	verified and approved	Version 01 -11/29/2022
Clovis Alberto Bertolini de Pinho Ricardo de Paula Feijó	Edson Antonio Lenzi Filho	Policy issued on 11/29/2022