



PAYBROKERS

Code of Ethics and Conduct

Client: Pay Brokers Cobrança e Serviços em Tecnologia SA

Curitiba, October 11, 2022.

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Glossary of terms and definitions adopted in this Code

For a better understanding of this Code of Ethics and Conduct, below is a glossary of terms and definitions adopted in this document:

- **public agent**- anyone who exercises, even if temporarily or without remuneration, by election, appointment, designation, hiring or any other form of investiture or bond, mandate, position, job or function in entities of the national or foreign Public Administration;
- **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;
- **Personal data** -information relating to an identified or identifiable natural person;
- **sensitive personal data**: personal information about racial or ethnic origin, religious conviction, political opinion, union membership or organization of a religious, philosophical or political nature, data referring to health or sex life, genetic or biometric data, when linked to an individual;
- **Due diligence** - Internal procedure carried out by Pay Brokers or by duly contracted third parties, with the objective of knowing its clients (Know your client - KYC), for the end user of the Company's service, the Company's employees, suppliers and business partners, all with the specific objective of preventing money laundering and preventing the association of Pay Brokers' name to business partners that could harm the company's name.
- **Financing of terrorism**- Financial support, by whatever means, to terrorism or those who encourage, plan or commit acts of terrorism;

- **KYC - Know your client** - Internal procedures aimed at informing the customer, with the aim of preventing money laundering;
- **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;
- **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;
- **SFN** -National Financial System - Set of entities and institutions that promote financial intermediation, that is, the meeting between creditors and resource borrowers.
- **Bribery** -Any act intended to induce someone to perform a certain act in exchange for money, material goods or other private benefits, especially public agents;
- **Processing of personal data**- any operation carried out with personal data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction; It is,
- **Final user**: individual with whom Pay Brokers carries out operations on behalf of and at the request of the customer (merchant);

1. Message from the Board of Pay Brokers

Pay Brokers, since its foundation, has always conducted and directs its business in an ethical manner. As a payment facilitation company (eFx), trust is one of the fundamental elements for us to continue to operate in an increasingly competitive market.

To this end, we structured our Compliance Program, so that this Code of Ethics and Conduct should be the document capable of leading Pay Brokers to make the best decisions on a daily basis.

The main objective of our Compliance Program is to reinforce our commitment to integrity. We have structured a Compliance and Risk Prevention Committee, duly trained by specialized professionals, designed to respond to any situations of non-compliance with the precepts of this Code of Ethics and Conduct.

We have also designed a reporting channel, which can be used by anyone interested in contributing reports, either anonymously or identified, and any situation that potentially may be at odds with what we encourage: taking the attitude that best reflects shapes our values and principles.

Achieving the objectives of facilitating transactions, payments and promoting change in the business sphere of our customers and users depends on the proper functioning of our Compliance Program. We cannot deviate from the path of what is right. First of all, the rules in this document are nothing more than tools that help us make decisions in a more qualified way.

In addition, we encourage all our administrators, employees, suppliers, customers and end users to carefully read the provisions of this Code of Ethics and Conduct, at least once a year.

To facilitate everyone's understanding, we also designed a Compliance Booklet, which provides an overview of the functioning of our Program, the expected and prohibited conduct of all our administrators, employees, suppliers, customers and end users, which has a language accessible to all interested parties.

Certain of your constant collaboration,

Pay Brokers Billing and Services at Tecnologia SA

board

2. Scope of application of the Code

This Code of Ethics and Conduct applies to the entire Pay Brokers conglomerate, and its companies in Brazil and abroad, as well as to its Senior Management, employees, suppliers, business partners and everyone who has direct or indirect commercial relationships with Pay Brokers. It is Pay Brokers' fundamental duty to disseminate the provisions contained in this document to all interested parties.

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

Pay Brokers' administrators, together with the Compliance and Risk Prevention Committee, will make every effort to ensure the regular functioning of the Compliance Program and disseminate the policies, normative provisions and mechanisms contained therein.

Likewise, this Code of Ethics and Conduct establishes the form of relationship between Pay Brokers and society, focusing on the Company's relationship with public agents, suppliers, service providers, and our customers, end users and the competition.

Pay Brokers must ensure that this Code of Ethics and Conduct is also applied in the equity interests which it has the power of corporate control in Brazil or abroad.

3. Prohibited and encouraged behaviors

The Code of Ethics and Conduct is intended, fundamentally, to discipline the behaviors considered prohibited and encouraged within the scope of 4 (four) basic relationship environments of Pay Brokers:

- (1) Our internal and interpersonal relationships, those present in the daily life of Senior Management and our employees;
 - (2) Relationships with our customers;
 - (3) External relations, which include public authorities and competition in general;
- It is,

- (4) Relationship with Pay Brokers end users.

Next, we demonstrate the behaviors encouraged and prohibited in relation to our internal work environment.

3.1. internal relations

The existence of a healthy work environment is essential for the people who are part of Pay Brokers to grow personally and professionally. For this reason, the following arrangements for the workspace are presented.

3.1.1. gifts and giveaways

The exchange of gifts and premiums is a common way of showing esteem and appreciation in business relationships. However, this practice may be detrimental to Pay Brokers' interests.

Thus, when accepting or offering gifts and gifts, the following provisions must be observed:

- The offer and receipt of gifts and premiums must comply with the law or regulation;
- The value of the gift or giveaway must not exceed the amount of R\$ 500.00 (five hundred reais), in the case of Brazil, and in other places where Pay Brokers operates, it must not exceed the amount of US\$ 300.00 (three hundred dollars North Americans) and/or €300 (three hundred Euros);
- It is forbidden to request any kind of gift or freebies, such as hospitality, or trips to anyone interested in doing business with Pay Brokers;
- Gifts should be understood as sporadic souvenirs and simple courtesy, distributed institutionally and in a generalized way, at specific times or at commemorative events, and may have the Pay Brokers logo;

- Payments or bribes cannot be considered;
- It is prohibited to offer or receive any gift that may be considered an undue advantage or that may influence the decision-making process of a public or private agent; It is,
- It is prohibited to accept or offer gifts or presents of any nature from any public agent.

Whenever gifts or gifts are offered, the Compliance and Risk Prevention Committee must be consulted through the channel compliance@paybrokers.com.br, which will assess the situation on a case-by-case basis and advise on the best attitudes to adopt.

3.1.2. Interpersonal relationship

Pay Brokers aims to conduct its business in compliance with environmental and safety laws and regulations, in order to promote the best working environment for its managers and employees.

Thus, in accordance with our principles and values, interactions between employees must be based on respect, transparency and team spirit, with any form of discrimination or harassment being prohibited.

If you witness any situation that potentially violates the rules of good coexistence in the work environment, it is recommended that you file a complaint with the Pay Brokers Reporting Channel, with the aim of guaranteeing a healthy work environment, so that you can carry out an internal verification of the best measure to be taken, according to the values that are encouraged below.

3.1.2.1. Diversity

Pay Brokers values respect for diversity and equality in the development of its activities. This includes the relationship between administrators and employees, and between them and external third parties, such as customers, commercial partners and government inspectors.

In addition to creating a space of balance and respect related to different genders, cultures, ethnicities, sexual orientations, social classes, among others, we seek to promote diversity and respect, positively impacting not only the company's culture, but above all in the relationship between employees .

Therefore, on Pay Brokers premises or outside activities, discrimination or harassment of any individual due to racial, ethnic, cultural, religious, ideological, age, ability, political, economic, social origin, marital status, or sexual orientation or gender.

3.1.2.2. Equality

Everyone deserves equal treatment in our company. As a result, everyone, regardless of position, submits to this Code of Ethics and Conduct in the same way. Therefore, the following conducts are prohibited:

- Embarrass, humiliate, offend, threaten or violate administrators, employees, customers, suppliers, partners and any other individual for the issues listed in the paragraph above; It is,
- Unequal treatment or favoritism, which does not equally treat subjects who are in the same situation, such as, for example, failing to follow some protocol defined in this Code for an administrator due to his/her hierarchy or the position he/she holds.

In addition, equality must be observed in the hiring, recruitment, promotions, punishments and conduct assessments of our employees. In the event of any of the conducts described above, it is imperative to send a communication to the Pay Brokers Reporting Channel, so that the appropriate measures can be taken, if applicable.

3.1.2.3. Employee privacy, safety and health

Pay Brokers values the privacy, safety and health of our administrators and employees. The company provides the necessary resources and guidelines for everyone to carry out their activities in the safest possible way. Preventing the occurrence of accidents in the workplace is essential for maintaining the well-being of the company.

Because of this, we also protect the personal data provided by our customers against misuse and sharing to external sources, in strict compliance with Law nº 13.709/2018, the General Data Protection Law (LGPD).

The processing of data considered sensitive, strictly personal information, such as racial or ethnic origin, religious conviction, political opinion, membership of a union or organization of a religious, philosophical or political nature, data referring to health or sexual life, data genetic or biometric, when linked, will always depend on the consent of the data subject for the handling of information by Pay Brokers.

Pay Brokers complies with the LGPD, handling data in accordance with the purposes provided for by law, maintaining the custody and storage of said data under a high level of security, throughout its treatment cycle, until the moment of its exclusion .

For more details, consult our Privacy Policy, available on the website <<https://paybrokers.com.br/politica-de-privacidade/>> and any information in this regard can also be requested from the Data Protection Officer (Data Protection Officer - DPO) from Pay Brokers, via email: privacy@paybrokers.com.br .

3.1.2.4. confidentiality of information

The information collected during the exercise of Pay Brokers functions is strictly confidential, and its disclosure for any purpose is prohibited, except when authorized by the Company. The concept of confidential information can be removed by exclusion: it is all that

information that is known by sources other than social networks and other external means of disclosure of the company.

This information cannot be passed on to third parties, nor be used to obtain personal advantage or favors by administrators and/or employees.

Therefore, caution is recommended with recordings and photographs taken on Pay Brokers premises, as, even if unintentionally, administrators and employees may make confidential information public, especially in strictly private environments.

The protection of confidentiality also remains valid and mandatory even after the termination of the employment relationship. This is because all employees, upon joining the company's staff, sign a Confidentiality Agreement on the information mentioned above.

3.1.2.5. Social media

Upon joining the company's staff, the employee starts to represent it in all his public appearances, and must ensure the values and principles of Pay Brokers also in his publications on social networks, in order to protect the reputation, image and interests of the Company .

For this, administrators and employees must follow the following recommendations:

- Never disclose confidential information about Pay Brokers and its business to customers, suppliers, end users or anyone possibly interested in this information;
- Bear in mind that Pay Brokers' commitment to equality, diversity and respect applies to the use of social networks;
- Immediately report any social media content that is inaccurate or inappropriate to the Compliance and Risk Management Committee;
- Never respond to company-related information, even if inappropriate or inaccurate;

- Not to post documents, images or video or audio recordings that contain property, products, services or people related to Pay Brokers without prior approval.

3.2. Relationship with our customers

The existence and maintenance of strictly professional relationships with our clients is of fundamental importance for Pay Brokers' activities.

Satisfaction and good customer service are fundamental and a priority in Pay Brokers' commercial activities. We value proactivity in meeting customer needs. The customer must trust the result and the quality of the service provided.

Managers and employees must maintain a high level of respect and professionalism, providing efficient customer service and maintaining a good relationship with customers, seeking to meet agreed targets and deadlines.

Therefore, Senior Management, Pay Brokers employees and their family members up to the second degree are prohibited from the following conduct:

- Carry out operations of any kind with active customers (merchants) of Pay Brokers, regardless of the amount wagered;
- Using privileged information as a result of exercising functions with the company to carry out operations of any nature with Pay Brokers customers, with a view to obtaining undue advantages, or not;

This ban is also imposed on Pay Brokers' suppliers, individuals or companies, who have access to relevant information on the company's customers (merchants).

Any of our clients carrying out any approach that may violate the aforementioned prohibition must be immediately reported to the Pay Brokers Compliance and Risk Management Committee, so that the best guidance can be provided on how address the issue.

If the customer (merchant) leaves Pay Brokers' active customer base, the prohibition contained herein will remain active for a period of 36 (thirty-six) months. Once this period has passed, the contracting of services is permitted, provided that the Compliance and Risk Management Committee is informed in advance about this situation.

In order to comply with the prohibition set out above, Pay Brokers' Board of Directors will provide managers and employees with a list of active/inactive clients over the last 36 (thirty-six months), subject to confidentiality obligations, as set out in item 3.1. 2.3 of this Code.

3.2.1. Conflict of interests

Conflicts of interest arise from situations in which there is considerable doubt between the personal interests of administrators, senior management and employees in relation to what is best for Pay Brokers. There will be a conflict of interest whenever:

- 1) Personal interests conflict with the obligations of directors, senior management and employees towards Pay Brokers;
- 2) Personal interests cause any damage to the reputation of Pay Brokers;
- 3) Involve the use of Pay Brokers resources and the use of resources belonging to the company. Any situation that raises doubts about potential conflicts of interest must be consulted with the Compliance Committee.

In addition, there is the case of hiring people with a degree of kinship or affective relationship with another employee. These cases are allowed as long as they are not in situations of direct or indirect subordination, acting on the same team or in activities that generate or characterize a conflict of interest.

If their affective relationship may affect the necessary exemption, the employee may not, under any circumstances, intervene in the hiring process or evaluation of someone with a potential conflict of interest.

Thus, it is not allowed to omit the existence of an affective bond or kinship relationship with another employee in the same hierarchical chain (who reports to the same manager, even if indirectly).

If any member of Pay Brokers has family relationships and works for any of our competitors, this information must be brought to the attention of their immediate leadership, to ensure that they will not be involved in tasks that may create a conflict of interest.

Under no circumstances is it permitted to disclose confidential information of Pay Brokers to family members, as well as request information about the respective competitor.

Eventually, if a family member owns a company that provides services in segments other than those performed by Pay Brokers, he may offer them to the Company and, in this case, all necessary procedures for the intended contract must be observed, provided that the values of the contract are average in the market. Hiring for these cases will also depend on authorization from our Executive Board, upon consultation with the Compliance and Risk Management Committee.

3.2.2. Environment and sustainability

The protection of the environment, health and safety of our managers and employees is one of our priorities, with the guarantee of the conscious use of scarce environmental resources. Thus, it makes up the core of actions aimed at this end:

- 1) The compliance of our activities with all environmental provisions;
- 2) Reduction in the consumption of natural resources; It is,
- 3) Application of the most appropriate techniques from an environmental point of view, aiming to reduce energy consumption and the impact caused to nature.

3.2.3. Intellectual property

At Pay Brokers, our employees develop their work through means that involve creativity and inventiveness, in search of greater efficiency. Thus, the result of this process may include innovations in the work environment that may be subject to intellectual property rights.

Results of innovation work shall be understood as all inventions, improvements, systems, software developments, technical information, methods, procedures, designs, analyses, drawings, reports, databases, domains, registered and/or solicited trademarks, trademarks product or service names, trademarks, logos and all similar or related information, whether registered or unregistered, relating to current or expected development or business, or existing or future products or services, of Pay Brokers that are conceived, developed or made by the employee while employed by Pay Brokers, together with all requests and registrations of patents, trademarks of products or services, trade names, copyrights and reprints that may be granted for or by any of the items above.

Thus, the employee voluntarily declares and by his own decision that he assigns totally, exclusively and irrevocably in favor of Pay Brokers all rights arising from any innovation mentioned in the previous paragraph, being in agreement with the unrestricted use of the work by the Company, which may to modify and use according to your own interests. Jointly, the employee certifies that he will hold Pay Brokers harmless from any claim made by a third party regarding the originality of the innovation.

3.3. External Relations

Pay Brokers, as a payment facilitator (eFX), is subject to the regulation of several rules and regulations, mainly the provisions of the Central Bank of Brazil - BCB. As such, we are committed to complying with the laws and regulatory requirements that govern our business.

3.3.1. Relationship with public and regulatory authorities

It is absolutely forbidden to offer any type of undue advantage to any public agent or regulator. Therefore, all administrators, employees, service providers and suppliers of Pay Brokers must observe the following provisions:

- (1) In the case of demanding any undue advantage or proposal incompatible with the values of Pay Brokers or with the provisions of this Code of Ethics and Conduct,

our employee must make clear his position of not agreeing with offering any type of advantage illicit;

- In the event of any interaction with public agents, such as meetings, inspections, among others, it is essential, whenever possible, the presence of at least 2 (two) members of Pay Brokers, preferably at least one of them in leadership level (Head, Coordinator, Supervisor), who can report in greater detail and precision the facts that occurred; It is,
- In the event of any act or omission that goes against the content of this Code of Ethics and Conduct, our employee must immediately notify the company's Complaints Channel and, when applicable, the competent public entity or body.

In addition, Pay Brokers has an Anti-Corruption and Anti-Bribery Policy, which includes specific principles and procedures for interactions with public agents.

3.3.2. Relationship with suppliers, service providers and competitors

Pay Brokers believes that, in order to carry out most of the provisions of its Compliance Program, it depends on the existence of a solid and trusting relationship with each of its suppliers and service providers.

For this reason, Pay Brokers has drawn up the Suppliers Policy, which governs, in detail, the main issues involving its suppliers. Pay Brokers encourages the development of business relationships with suppliers and business partners who observe the following points:

- (1) Have a permanent commitment to integrity, preferably with the operation and development of compliance activities;
- (2) Pay Brokers may adopt, for certain suppliers, due diligence or integrity, depending on the complexity or sensitivity of the contractual object, under the terms of the Suppliers Policy; It is,

- (3) Acceptance by the supplier of the terms of the Pay Brokers Anti-Corruption and Anti-Bribery Policy, as well as the provision in the contractual instrument of a clause regarding the company's Compliance Program.

Further details on how Pay Brokers conducts negotiations and executes contracts can be consulted in the Anti-Corruption and Anti-Bribery Policy and in the Suppliers Policy.

3.3.3. Relationship with Pay Brokers end users

The correct treatment of end users of Pay Brokers services is of fundamental importance for the continuity of the Company's business.

Thus, the same treatment provided for in items 3.1.2 (Interpersonal relationship) and 3.2 (Relationship with our clients) should be applied to end users of Pay Brokers services, especially regarding the need to maintain respectful relationships between Pay Brokers and the end users of our services.

4. Policies that are part of our Compliance Program

As a way of adding to the guidelines presented in this Code of Ethics and Conduct and contributing to the proper functioning of the Compliance Program, Pay Brokers has created the following policies:



POLÍTICAS INTEGRANTES DO PROGRAMA DE *COMPLIANCE*

- 1. Política de privacidade e proteção de dados
- 2. Política anticorrupção, antissuborno e de relacionamento com autoridades públicas
- 3. Política de due diligence
- 4. Política de produtos da Pay Brokers
- 5. Política de fornecedores
- 6. Política de prevenção à lavagem de dinheiro e ao financiamento do terrorismo

For a better understanding and detailing of situations that may be the subject of questions to the Compliance Committee and the company's management, it is recommended to read each aforementioned integral Policy.

4.1. Privacy and data protection policy

The Privacy and Data Security Policy governs the internal procedures to be adopted in relation to the protection of personal data and information processed by Pay Brokers. It reinforces the Company's duty to promote measures to protect the information entrusted to it, especially regarding the processing of personal data.

4.2. Anti-corruption, anti-bribery and relationship policy with public authorities

The anti-corruption, anti-bribery and relationship with public authorities Policy aims to ensure that Pay Brokers can relate in a transparent manner with the Public Administration, aiming to reduce the risk of acts of corruption or bribery to public authorities.

As previously stated, the possibility of offering any type of undue advantage to public agents is prohibited. For this, the details regarding the form of relationship with public agents or regulatory authorities must be consulted in the aforementioned Policy.

4.3. due diligence policy

Pay Brokers must carry out the due diligence procedure, with the objective of knowing its clients (Know your client - KYC), in order to know the end user of the Company's service, the Company's employees, suppliers and business partners, all this with the specific objective of preventing money laundering and preventing the association of Pay Brokers' name to business partners that could harm the company's name.

Before entering into strategic partnerships or even entering into high-value or high-risk contracts (especially in the case of sensitive suppliers), Pay Brokers may carry out a due diligence procedure (or internal verification) of integrity of the potential contractor or partner, in order to to check the following items:

- (1) Reputation of the potential hire or partner;
- (2) Legal, technical, environmental, economic or financial compliance in a manner compatible with the object of performance of the contract; It is,
- Compatibility of the contractor's expertise with the contractual object to be performed.

The due diligence procedure may also be applied during the contractual execution phase, as a way of monitoring the activities of the supplier or contractor, especially in the event of any non-compliance with the provisions set forth in this Code of Ethics and Conduct.

4.4. Pay Brokers Product Policy

The Pay Brokers Product Policy governs the functioning of the products and services offered by the Company to its customers, aiming to standardize the treatment of language with potential interested parties in its services.

4.5. supplier policy

The following actions with service providers, suppliers and business partners are also recommended:

- (1) Ensure that there are anti-corruption clauses in the contracts signed by Pay Brokers;
- (2) Demand full compliance with contractual provisions; It is,
- (3) Knowledge by all employees of the laws and regulations in the places of their activities.

Finally, it should be noted that all procedures for the acquisition of goods, services and materials must follow the Company's real needs.

4.6. Money laundering and terrorist financing prevention policy

This Policy has as its main objective the prevention of any act of money laundering, consisting of acts of concealing or disguising the nature, origin, location, disposition, movement or ownership of assets, rights or amounts arising, directly or indirectly, from a criminal offense .

The purpose of the document is also to define the roles and duties of the internal bodies of Pay Brokers responsible for the observance and continuous monitoring of the functioning of the mechanisms for the Prevention of Money Laundering and Financing of Terrorism - PLDFT, with the establishment of the essential requirements of governance .

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

- **Preventing the occurrence 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;
- **Implement internal procedures compatible with the size, volume of operations and risk** -Pay Brokers is attentive to internal procedures to prevent money laundering and terrorist financing. In any case, the functioning of PLDFT efforts must be compatible with the volume of operations.

Details regarding the operation of the PLDFT Policy must be consulted in the specific document prepared by the Company. The prevention of money laundering and financing of terrorism constitutes one of the main pillars of Pay Brokers' activity, being imperative the immediate communication of any indication or suspicion of the concealment of the origin of values.

5. Program media

The fundamental premise of our Compliance Program is to provide a safe and accessible means for all interested parties to bring contributions, queries or even report situations of non-compliance.

5.1.1. Pay Brokers Ethics and Reporting Channel

Pay Brokers makes the e-mail compliance@paybrokers.com.br available for contact with the Compliance area as a reporting channel in the event that any administrator, employee, supplier, customer or third party becomes aware of any situation that constitutes a violation of the rules of Compliance.

The same e-mail address can also be used to ask questions, make suggestions or recommend improvements to Compliance policies.

5.1.2. Guarantee of anonymity and confidentiality

Pay Brokers provides the possibility for everyone to bring reports or contributions to the Compliance Program without the need to identify themselves. Ensuring anonymity and confidentiality throughout the contribution process is essential for maintaining security and trust in Compliance activities.

5.1.3. Prohibition of retaliation

Under no circumstances will retaliation be allowed against any administrator, employee, supplier or third party who may bring any type of contribution, report or complaint through the means of communication of the company's Compliance Program.

5.2. Compliance Program Management

The Pay Brokers Board is responsible for approving the institutional guidelines involving the full operation of the Compliance Program.

The Board of Directors also has a primary role in constantly monitoring the functioning of the Compliance Program mechanisms. To this end, the Executive Board is directly responsible for supervising strict compliance with internal integrity rules and procedures by Pay Brokers.

Furthermore, the Board of Pay Brokers is responsible for providing material and human resources for the proper functioning of the Compliance Program and for all the Company's efforts to reinforce its commitment to ethics and integrity.

The Executive Board is also responsible for constantly monitoring situations of non-compliance with this Code of Ethics and Conduct and will provide guarantees that the

Compliance and Risk Prevention Committee takes appropriate measures for the correct handling of situations that come to its attention. knowledge.

5.3. Pay Brokers Compliance and Risk Prevention Committee

The Compliance and Risk Prevention Committee is the body responsible for directly applying the money laundering and terrorist financing prevention policies. The Committee has the following functions:

- Supervision and monitoring of situations that require direct action by the agency;
- Support and advise the Board of Directors in defining and evaluating the foundation of the Compliance Program; It is,
- Receiving and dealing with complaints of potential non-compliance with this Code and the Program's integral policies.

The body is composed of members appointed by the Board of Pay Brokers, and may be formed by employees and contracted specialists, depending on the case, composed of 3 (three) to 7 (seven) members.

The Pay Brokers Compliance and Risk Prevention Committee has as its main objective the promotion and dissemination of internal compliance regulations, with the following attributions:

- 1)** The clarification and resolution of doubts or conflicts in the interpretation of the Code;
- 2)** The decision on the complaints received by the complaints mechanisms;
- 3)** The preservation of the identity of people who contribute with information and reports of situations of non-compliance with the provisions of this Code of Ethics and Conduct;

- 4) Inspection of the prohibitions, guidelines and instructions of the Code;
- 5) Conducting internal investigations that may be designated by Pay Brokers administrators;
- 6) Periodic reporting to Pay Brokers administrators on the development of activities within its competence; It is,
- 7) The proposal to update the documents that are part of the Compliance Program.

5.4. Disciplinary measures in case of violation of the provisions of the integrity mechanisms

In the event of violation of the provisions of the Compliance Program, Pay Brokers may adopt disciplinary measures against administrators, employees and suppliers that may cause any type of damage to the company, as a result of non-compliance with Compliance rules.

The appropriate measures will be analyzed on a case-by-case basis, with an impartial and skeptical assessment by Pay Brokers' management.

If the violation is committed by employees, measures may include warnings, suspensions and/or dismissals.

In case of violation of the precepts of this Code by suppliers, service providers and business partners of Pay Brokers, the measures may include warnings, fines provided for in the respective contracts and/or justified unilateral suspension or termination of the contractual relationship, without right to compensation or prior notice.

5.5. Handling of communications addressed to the Compliance Program

All communications addressed to the Pay Brokers Compliance Program are considered absolutely confidential and the members of the Committee are responsible for observing the need to maintain secrecy (cf. Pay Brokers Anti-Corruption and Anti-Bribery Policy).

6. Final dispositions

This Code of Ethics and Conduct was unanimously approved on October 11, 2022 by the Board of Pay Brokers.

This Code of Ethics and Conduct is effective as of October 11, 2022.

Curitiba, October 11, 2022.

Clovis Alberto Bertolini de Pinho
OAB/PR No. 79.626
digitally signed

Ricardo de Paula Feijó
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