



# SUPPLIER POLICY

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## SUPPLIER POLICY

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## SUPPLIER POLICY

### 1. Presentation of the Supplier Policy

Pay Brokers, in addition to establishing integrity benchmarks, considers fundamental the adoption of values and principles contained in its Compliance Program in the entire scope of activity, including the relationship established with suppliers and business partners.

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

This Policy provides guidelines and guidelines for the proper establishment and conduct of Pay Brokers' relationships with suppliers and business partners.

It is recommended that all administrators, employees and suppliers of Pay Brokers are aware of the provisions of this Company's Supplier Policy, and read this document concomitantly with the Code of Ethics and Conduct of Pay Brokers.

### 2. Control of Supplier Policy updates

TOPIC	DATE	CHANGE
1. Presentation of the Supplier Policy	01/18/2023	Document emission
2. Control of Supplier Policy updates	01/18/2023	Document emission
3. Objectives of this Policy	01/18/2023	Document emission
4. Scope of application of this Policy	01/18/2023	Document emission
5. Provisions of the Supplier Policy	01/18/2023	Document emission
5.1. General provisions	01/18/2023	Document emission
5.2. Hiring risk classification	01/18/2023	Document emission
5.3. Term of Commitment	01/18/2023	Document emission

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5.4. Supplier evaluation procedure (integrity due diligence)	01/18/2023	Documment emission
5.5. Contract execution monitoring	01/18/2023	Documment emission
5.6. Requirements for hiring suppliers	01/18/2023	Documment emission
5.7. reporting channels	01/18/2023	Documment emission
5.8. Disciplinary measures in case of violation of the provisions of the Supplier Policy	01/18/2023	Documment emission
6. Persons responsible for managing this Policy	01/18/2023	Documment emission
7. normative references	01/18/2023	Documment emission
8. General provisions	01/18/2023	Documment emission

### 3. Objectives of this Policy

Pay Brokers, in addition to establishing integrity benchmarks, considers fundamental the adoption of values and principles contained in its Compliance Program in the entire scope of activity, including the relationship established with suppliers and business partners.

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

This Policy provides guidelines and guidelines for the proper establishment and conduct of Pay Brokers' relationships with suppliers and business partners.

Therefore, it is recommended that the entire reading of this document and the application of the provisions contained therein by Pay Brokers' suppliers and members be applied.

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### 4. Scope of application of this Policy

The Pay Brokers Supplier Policy is addressed to suppliers of materials, service providers and intermediary agents who are providing services to the Company.

Members of Pay Brokers who maintain dealings, within the scope of the Company, with suppliers, service providers and/or intermediary agents are also subject to the provisions of this Policy.

### 5. Provisions of the Supplier Policy

#### 5.1. General provisions

Pay Brokers believes that the implementation of part of the provisions of its Compliance Program substantially depends on the existence of a solid and trusting relationship with each of its suppliers, service providers and intermediary agents.

In this way, the Company encourages the establishment of commercial relationships with partners who have a permanent commitment to absolute respect for integrity.

In this sense, the existence of a duly implemented compliance program and mechanisms will be considered a differential when hiring a potential supplier, service provider or intermediary agent.

Whenever possible, Pay Brokers must make sure that there is a contract signed by the supplier, which contains provisions for acceptance of compliance and bribery prevention clauses.

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Likewise, the existence of ISO 37,001 and 37,301 certification will constitute a differential in decision-making on supply, prioritizing potential partners who are already certified.

There must be a commitment for the awareness and application of the terms of the Pay Brokers Integrity Program, by the supplier, service provider or intermediary agent, by means of a contractual clause and, if necessary, a specific term of commitment.

Furthermore, Pay Brokers may adopt integrity due diligence procedure, depending on the complexity or sensitivity of the contractual object.

### **5.2. Hiring risk classification**

The Pay Brokers Compliance Committee will assess possible risks to the image, integrity, legal, operational and financial risks and will classify the hiring according to its degree of risk:

- 1) High Risk:** Hiring service providers, suppliers, employees or third parties who may:
  - a) Interact, directly or indirectly, with Public Agents on behalf of and for the benefit of Pay Brokers;
  - b) Interact, directly or indirectly, with Pay Brokers clients or other Pay Brokers contractors;
  - c) Facilitate the obtaining of licenses or authorizations with the Government;
  - d) Possess accusation, ongoing investigation or conviction in criminal, impropriety or similar actions;
  - e) Represent a risk of corruption, bribery or conflict of interest.

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### 2) Low risk:

- a) Activities that do not involve Public Agents and the Public Power;
- b) Supply of materials and inputs in general;
- c) Internal services, such as cleaning, hygiene and security companies;
- d) Activities not classified as High Risk;

If there is any doubt on the part of the Compliance Committee as to the degree of risk involved in hiring, Pay Brokers' Board of Directors may be consulted.

### 5.3. Term of Commitment

For contracts classified as High Risk, suppliers, service providers and intermediary agents providing services to the Company will be required to sign a term of commitment, drawn up by Pay Brokers.

This document is necessary for suppliers, service providers and intermediary agents to be aware of and apply the provisions of the Pay Brokers Supplier Policy.

It is recommended, when drafting the Term of Commitment, that you also acknowledge the provisions contained in the Company's Code of Ethics and Conduct, a document that complements this Policy.

It is important to point out that the signature of the term does not exempt the need for provision, in the contractual instrument signed with the supplier, service provider or intermediary agent, of High or Low Risk, of a clause regarding respect for the Company's Compliance Program.

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For hiring classified as Low Risk, the signature of the Term of Commitment may be required if the Compliance Committee identifies any risk that justifies such a measure.

### **5.4. Supplier evaluation procedure (integrity due diligence)**

Suppliers whose contracts arise from: (i) provision of legal services; (ii) representation; (iii) sponsorship; and, finally, (iv) any activities that present some risk of bribery, including high-value contracts.

With regard to the last hypothesis mentioned above (iv) it will be up to the Compliance Committee to assess, prior to contracting, the need to carry out the integrity due diligence procedure for the supplier, service provider or intermediary agent.

In this sense, for the list of contracts mentioned, Pay Brokers will be able to carry out a prior investigation of compliance, since the Company confirms its commitment to honesty and transparency in its relations with the market.

Thus, Pay Brokers may forward, for proper completion, a questionnaire about the existing compliance mechanisms implemented by the supplier, service provider or intermediary agent within the scope of the development of its activities.

The Company may also request documents to attest the technical, legal and economic-financial compliance of the supplier, service provider or intermediary agent. The required documents can be:

- a) Certificate of labor regularity, issued by the Superior Labor Court;
- b) Certificate of tax regularity before the Union, the State and the Municipality of domicile of the supplier;



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- c) Certificate of civil claims distributed in the supplier's domicile (State and Federal Courts);

In addition, Pay Brokers may require the supplier, service provider or intermediary agent to prove that they:

- a) They do not have a final and unappealable conviction for violating the provisions of the Anti-Corruption Law, the Law of Administrative Improbability or the Law of Administrative Tenders and Contracts;
- b) They were not punished with the sanction of prohibition of contracting with the Public Power or suspension of the right to bid by any body or entity of the Public Administration of the Union, States, Municipalities and Federal District;
- c) They are not registered in the Register of Disreputable and Suspension Companies (CEIS) and in the National Register of Punished Companies (CNEP), maintained by the Comptroller General of the Union (CGU);
- d) They are not registered in the National Register of Civil Convictions for Acts of Administrative Improbability and Ineligibility of the National Council of Justice (CNJ); It is,
- e) They are not prevented from functioning or acting by administrative decision of any body or entity of the Public Administration.

Once the need to present any of the documents mentioned in this item has been verified, it will be evaluated by the Compliance Committee.

If the regularity of the company is understood, proceed with the contracting of the supplier, service provider or intermediary agent.

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In the event that there is any suspicion of irregular behavior, the matter must be taken to the legal department and to the Board of Pay Brokers, who will jointly decide on whether or not to hire the evaluated person.

In this case, new steps may be required to request documents from the potential supplier, service provider or intermediary agent.

Once the new diligences have been taken care of, the Compliance Committee, the legal department and the Board of Pay Brokers will decide definitively on whether or not to hire the evaluated person.

### **5.5. Contract execution monitoring**

Once contractual execution begins, Pay Brokers will make continuous efforts to assess its relationship with suppliers, service providers or intermediary agents. These efforts will be directed by administrators, employees and the Compliance Committee, but especially by the areas of the company that most directly monitor the status of the contract.

Thus, the quality of the products offered and the services provided, the legitimacy and compatibility of the contracted price and the permanent monitoring of compliance with the commitments assumed in the contract and in the Term of Commitment are guaranteed.

### **5.6. Requirements for hiring suppliers**

Suppliers, service providers or intermediary agents hired by Pay Brokers must, in addition to being recognized for the quality of their services and products, undertake to:

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- a) Comply with Brazilian and foreign legislation and regulations applicable to your business, as well as with the contract signed, with the Term of Commitment signed, and with the Pay Brokers Compliance Program;
- b) Maintain confidentiality of confidential information;
- c) Adoption of measures to prevent money laundering and terrorist financing;
- d) Not to engage in acts of bribery, corruption or anti-competitive activities;
- e) Not to condone any type of discrimination, violence, harassment or promote any type of content with an extremist ideological tendency;
- f) Promote safety and health at work;
- g) Respect the cordial relationship with Pay Brokers, including in an online environment, refraining from disclosing textual or audiovisual content that detract from Pay Brokers' image and only using Pay Brokers' name and image with prior authorization from the Company.

These requirements consolidate the main provisions of the Pay Brokers Compliance Program which suppliers are required to comply with. The requirement, however, is not one-sided. These are commitments also assumed by Pay Brokers towards its suppliers, in favor of healthy, ethical and fair commercial relationships.

### **5.7. reporting channels**

In the event that any suspicion of irregularities and/or non-compliance with this Supplier Policy is found, a complaint must be made through the channels made available by Pay Brokers, namely:

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- Via email: [compliance@paybrokers.com.br](mailto:compliance@paybrokers.com.br)
- Via the website, through a specific tab for complaints.

Through e-mail, it is also possible to ask questions, send suggestions or recommendations for the continuous improvement of the Pay Brokers Compliance Program.

### **5.8. Disciplinary measures in case of violation of the provisions of the Supplier Policy**

In case of violation of provisions of the Supplier Policy, the measures to be taken by Pay Brokers will be defined on a case-by-case basis by the Compliance Committee.

Depending on the severity of the specific situation, Pay Brokers may decide to terminate the contractual relationship between the parties.

## **6. Persons responsible for managing this Policy**

The Supplier Policy will be coordinated by the Pay Brokers Board of Directors and the Compliance Committee, similarly to the leadership of the Integrity Program.

The Board of Pay Brokers will be responsible for:

- a) The provision of the necessary resources for the implementation of this Policy, whether human, physical and/or financial resources.

The Compliance Committee will:

- a) Evaluate the contracting risks and classify them as high or low risk, pursuant to item 5.2;

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- b) Carry out the evaluation procedures - integrity due diligence - of suppliers listed in item 5.4;
- c) Manage the reporting channel, as well as handle the information received impartially and confidentially, initiating, if necessary, internal investigations within the Company;
- d) Monitor the effectiveness and full compliance with the provisions set forth in this Policy;
- e) Keep this Policy up to date and available to Pay Brokers members and suppliers and partners;
- f) Be the spokesperson for the Supplier Policy throughout Pay Brokers' field of activity.

Other issues not covered by this Policy must be taken by the Compliance Committee to the Board of Pay Brokers.

### **7. normative references**

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

- Law 12.846/2013 (Anti-Corruption Law);
- Art. 42, XIII, of Presidential Decree No. 8,420/2015;
- ABNT NBR ISO 37.001 – Anti-bribery management system (ISO 37001: 2016 – Anti-bribery management systems – Requirements with guidance for use).



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### 8. General provisions

This Policy was approved by the Board of Pay Brokers on 01/18/2023.

This version of the Pay Brokers Supplier Policy will come into effect from 01/18/2023.