



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Introduction

FacilitaPay has as a principle the respect for national and international anti-bribery and anti-corruption laws, as well as the belief in the commitment to integrity in the conduct of its business and it is the responsibility of all employees to ensure that actions on behalf of FacilitaPay comply with such principles.

Thus, it is the duty of all employees and partners to comply with the guidelines set forth in the anti-bribery and anti-corruption laws and should always be vigilant and not ignore the warning signs when circumstances indicate a potential violation of this Policy. FacilitaPay encourages the communication and reporting of any violations to the company's Compliance Department.

Any non-compliance with this Policy, as well as any other FacilitaPay policy will be subject to internal disciplinary procedures, according to the Norm of Guidelines for the Application of Consequences, without prejudice to any applicable legal measures.

2. Terms and Definitions Corruption and bribery:

Corruption is the phenomenon by which public or private agents abuse the power entrusted to them so that, in exchange for illegitimate benefits, they give preference to the private interests of the corruptors.

It increases the costs of doing business, creates uncertainty in negotiations, hinders economic growth and international trade, and weakens democratic values. While relationships with public officials are seen as especially sensitive to corruption, it can also be relevant in the context of the private sector.

Bribery is a kind of corruption, characterized by the intentional offer, suggestion, payment, or authorization of payment to someone for personal gain, with the intention of



motivating active or passive deviation from functional duty in order to ensure or accelerate the performance of a function.

2.1. Gifts (as in trinkets or souvenirs)

They are promotional and institutional items, which contain commercial message, distributed by any type of organization as a courtesy, disclosure or on the occasion of events or commemorative dates. They should not be personal, meaning they should be offered to a group of people.

2.2. Gifts

They are items of commercial value, offered to specific recipients by any type of organization, as an expression of appreciation or goodwill. They can be customized with the recipient's name.

2.3. Hospitality

They are trips, cruises, tickets, lodging, meals, transportation services and other services related or not to entertainment whose purpose is to promote and / or demonstrate products and services. If the purpose of the services offered is only tourism, they should be considered as gifts.

2.4. Conflict of Interest

These are situations generated by the conflict between a personal interest and the corporate interest, in which there is damage to FacilitaPay.

3. Compliance Department

The structure of the Compliance Department was defined by senior management and based on the risk analysis carried out. The Compliance Department has decision-making autonomy and is not subordinate to other departments.

The duties of the Compliance Department are:

- Supervise the design and implementation of the Integrity System, taking into account anti-corruption and anti-bribery aspects;
- To guide the Executive Board, Board of Directors, Fiscal Council, advisory committees and other departments of the Company in matters related to compliance with anti-corruption and anti-bribery legislation, rules, regulations;
- Transparency Manual and internal compliance policies;
- Report periodically or when requested the performance of the Integrity System to the Executive Board, Board of Directors, Fiscal Council and advisory committees;
- Ensure that the Integrity System complies with the relevant legislation, the requirements of the best market practices, as well as the needs and expectations of all stakeholders.

4. Guidelines

4.1. What should be done

4.1.1. Gifts, Gifts and Hospitality

Only offer or receive gifts, gifts, hospitality or undue favors when such act does not influence or does not seem to influence the decisions of the company or the people with whom we have any type of business relationship.

Such items can only be offered or accepted, as long as it is proportional to the established business relationship, and there must always be transparency, documentation and due accounting records.

4.1.2. Conflict of Interest

It is important that the existence of an appropriate process for the creation and review of the functional structure, the definition and distribution of responsibilities is always certified, contemplating the adequate segregation of activities and mitigating potential conflicts of interest, as well as the implementation of a system that allows restricted and controlled access to sensitive information, establishing an approval flow capable of

verifying access requests that must be compatible with the functions of employees, in order to ensure the confidentiality of confidential information and the absence of conflict of interest.

4.1.3. Registration of Financial Operations

It is essential that all financial operations are recorded and documented in accordance with the applicable legal, accounting and tax provisions, keeping the records and supporting documents filed by the legal deadline for submission to the supervisory bodies whenever necessary.

4.1.4. Relations with Third Parties

Execution of KYC (Know Your Customer), KYP (Know Your Partner) and KYE (Know Your Employee) processes in order to ensure that Customers, Merchants, End Users, suppliers, partners and employees act in accordance with this Policy and other Company Policies.

4.1.5. Donations and Sponsorships

Donations and sponsorships should be primarily philanthropic, based on social, cultural and educational interests. Nevertheless, any donation or sponsorship must obtain a Legal and Compliance opinion validating its effectiveness, and the receiving institution must always offer proof of the operation, so that it can be registered in accordance with the law.

4.2. Disciplinary Measures

Any employee who violates this Policy will be subject to disciplinary action. All violations will be duly investigated, in accordance with the procedures of the Conduct Committee, ensuring anonymity to those involved, and all have an obligation to cooperate with the ongoing investigations.