



Confidence
câmbio

Corporate Integrity and Anti-Corruption Policy

Executive Summary

The Travelex Confidence Group is committed to preserving and constantly improving its high standards of ethics and conduct in its relationships with employees, customers, business partners and third-party service providers through a set of guidelines, internal procedures and management structure. risks dedicated to preventing, detecting and combating corruption and fraud.

The Corporate Integrity and Anti-Corruption Policy establishes the principles to be followed when conducting all activities of the Travelex Confidence Group, in accordance with applicable regulations and best market practices.

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Corporate Integrity and Anti-Corruption Policy

1. GOAL

This Corporate Integrity and Anti-Corruption Policy ("Policy") reinforces the Travelex Confidence Group's commitment to combating corruption and preserving its high standards of integrity, ethics and conduct, establishing the guidelines and practices that must be followed to ensure compliance with current anti-corruption laws and consequently to mitigate potential external and internal risks of corruption practiced by individuals acting at the behest or representing the Group's companies, in addition to best practices in this context, taking into account the legal and regulatory environment.

2. SCOPE AND APPLICABILITY

The provisions of this Policy apply to all direct and indirect employees of the companies Travelex Banco de Câmbio SA and Confidence Corretora de Câmbio SA, which make up the Travelex Confidence Group, including Senior Management, business partners, outsourced service providers and customers, in addition, requires compliance with the Corporate Policy of the Code of Ethics and Conduct and the National Law to Combat Corruption (Law 12,846/13), as well as Decree No. 11,129/22, which provides for the administrative liability of legal entities for the practice of acts against the public administration, national or foreign. Additionally, by operating with currencies from around the world and maintaining international commercial relations, the Travelex Confidence Group is subject to the provisions of foreign laws Foreign Corrupt Practices Act - FCPA (North American law against corrupt practices abroad) and United Kingdom Bribery Act - UKBA (United Kingdom Bribery Act).

3. CONCEPTS

- a. Client:** Any natural or legal person whose relationship with the Travelex Confidence Group has been approved so that they can carry out commercial and/or financial operations, on an eventual or permanent basis, in accordance with the parameters established by current regulations and by the Travelex Confidence Group, intended for the provision of financial service or carrying out foreign exchange operations.
- b. Service provider:** Type of contracting that includes the execution of work provided by a third party (legal entity or individual) that can be extended to consultancy and advisory services.
- c. Outsourced:** Hiring a competent and qualified professional to perform a specific task or function; holds certain knowledge (expertise) that the requesting area needs. The specialized third-party professional works under a service provision contract.
- d. Business Partners:** Individual or legal entity that acts under the guidelines and on behalf of the Travelex Confidence Group contractor, assuming full responsibility for the service provided to customers and users. They are: Intermediary, foreign exchange correspondent, indicators, remittance, remittance, facilitator and exchange brokers;

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- e. Acts harmful to public administration, national or foreign:** Acts that violate national or foreign public assets, against principles of public administration, national or international, or against international commitments assumed by Brazil, defined as follows:
- i. Promising, offering or giving, directly or indirectly, an undue advantage to a government official or third party related to him or her;
 - ii. Proven to finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for in this Law;
 - iii. Provenly, using an interposed natural or legal person to hide or disguise their real interests or the identity of the beneficiaries of the acts carried out;
 - iv. Frustrate or defraud, through adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
 - v. Prevent, disrupt or defraud the performance of any public bidding procedure;
 - vi. Repel or seek to remove a bidder, through fraud or offering an advantage of any type;
 - vii. Fraudulent a public tender or contract arising therefrom;
 - viii. Create, fraudulently or irregularly, a legal entity to participate in public bidding or enter into an administrative contract;
 - ix. Obtaining an undue advantage or benefit, fraudulently, from modifications or extensions of contracts signed with the public administration, without authorization by law, in the act calling for public bidding or in the respective contractual instruments;
 - x. Manipulate or defraud the economic-financial balance of contracts signed with the public administration;
 - xi. Hinder the investigation or inspection activities of public bodies, entities or agents, or intervene in their activities, including within the scope of regulatory agencies and supervisory bodies of the national financial system.
- f. Corruption:** (a) Active: Offering or promising an undue advantage to a public official, to encourage him to perform, omit or delay an official act; and (b) Passive: Requesting or receiving, for oneself or another, directly or indirectly, even outside the role or before assuming it, but because of it, an undue advantage, or accepting a promise of such an advantage.
- g. Public servants:** For the purposes of this Policy, the following are considered public employees:
- i. Anyone who, although temporarily or without remuneration, holds a position, job or public function. A public employee is equivalent to anyone who holds a position, job or function in a government agency, department or organization, and who works for a service provider company contracted or contracted to carry out typical Public Administration activities;
 - ii. Employees or representatives of international public organizations, such as the World Bank, the United Nations and the International Monetary Fund;
 - iii. Private sector individuals acting on behalf of government entities.
- h. Foreign Public Administration:** state bodies and entities or diplomatic representations of a foreign country, at any level or sphere of government, as well as legal entities controlled, directly or indirectly, by the public authorities of a foreign country.

note: International public organizations are equivalent to foreign public administration.

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- i. Foreign Public Agents:** whoever, even if temporarily or without remuneration, holds a position, employment or public function in bodies, state entities or in diplomatic representations of a foreign country, as well as in legal entities controlled, directly or indirectly, by the public authorities of a foreign country or in public organizations international.
- j. Private Agents:** Private Agents are considered to be all those who hold a position or function in private companies, that is, legal entities governed by private law.
- k. Anti-Corruption Legislation:** Law No. 12,846/2013 and DECREE No. 11,129/22 are Brazilian anti-corruption legislation, providing for the objective administrative and civil liability of legal entities for committing acts against public administration, national or foreign.
- l. FCPA (Foreign Corrupt Practices Act):** This is the North American federal law to combat foreign corruption, which aims to prevent the payment, offer or promise to pay monetary amounts or valuable goods to public officials, foreign political parties or candidates for government positions in order to obtain a undue advantage.
- m. UKBA (UK Bribery Act):** This is the UK's anti-corruption law. Unlike the FCPA and the national Anti-Corruption Law, the UKBA provides for corruption in both the private and public spheres. It is considered an act of corruption to offer, promise, pay, request, agree, receive or accept an undue advantage to a private/public agent. The UKBA applies to natural or legal persons. Companies that do not have measures to prevent corruption are also subject to the application of the UKBA.
- n. Undue Advantage:** Undue advantage consists of any benefit, even if non-economic, such as bribes, gifts, gifts, trips, meals, accommodation, entertainment and work opportunities. It is worth mentioning that even benefits of low value, or with no apparent value, may constitute an undue advantage if in return they consist of obtaining a personal or business advantage;
- o. Facilitation of Payment:** It consists of payment or promise of payment to a public agent with the intention of accelerating, facilitating or guaranteeing the performance of routine public actions, such as permits, licenses, police protection, inspections and authorizations;
- p. Bribery:** It is a form of corruption that is characterized by the offering or acceptance of any type of gifts, loans, fees or any other advantage, with the intention of inducing a certain person to perform an action or omit illegally;
- q. Influence Trafficking:** Crime provided for in the Penal Code which consists of requesting, demanding, charging or obtaining, for oneself or for others, an advantage or promise of an advantage, under the pretext of influencing an act carried out by a public official in the exercise of his/her role;

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- r. Internal/external fraud, including accounting fraud** :any cunning, deceitful act, in bad faith, with the intention of harming or deceiving others, or of failing to fulfill a certain duty, whether internally or by a client, business partner or supplier.

4. PRINCIPLES

The principles that guide the Corporate Integrity and Anti-Corruption Policy are:

4.1. Integrity and Conduct

It personifies the community as a moral agent, means being in accordance with current legislation and regulations (national and international, applicable to business and relationships established by the Travelex Confidence Group) and is also the foundation of ethics, which is based on social morality. In practice, it means the quality of someone who is integrity, honest and upright in character, complete in terms of good practices, as well as incorruptible. It is the pillar of other principles.

4.1.1. Ethics

It indicates moral values that guide human actions in society and serves as a guide for correct attitudes and within the law, customs and conduct, without interfering with the rights of others, based on honesty, solidarity and equality.

4.2. Data Privacy

Processing in a respectful manner that diligently protects personal data, including in digital media, by a natural person or legal entity governed by public or private law, national or foreign, with the aim of protecting the fundamental rights of freedom and privacy and the free development of the personality of the natural person.

4.3. Collaboration with Public Authorities

As one of the institutions responsible for the regularity of the financial system, we adopt strict governance and compliance policies. The Travelex Confidence Group, through its Board of Directors, reinforces its commitment to combating illicit practices.

4.4. Continuous Improvement

Improve standards of conduct, increase product quality, safety levels and service efficiency.

4.5. Advertising and communication channels

The Compliance area is responsible for ensuring that all directors, administrators and employees are aware of this Policy and its guidelines, through mandatory reading in the hiring process and making it available to all employees, at any time, through dissemination of the document on the intranet.

5. CORPORATE GUIDELINES

- a) The Travelex Confidence Group supports the Brazilian government in its anti-corruption actions, which is why it defined the guidelines of this Policy, which must be followed by the Group's

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Management and employees, direct and indirect, business partners and outsourced service providers and customers.

- b) The interactions of the Travelex Confidence Group between agents of the public administration, national or foreign / agents of the private sector, its employees and third parties, must be guided by ethics and integrity. Therefore, any and all forms of offering or requesting rewards are prohibited, as well as their receipt and/or acceptance, material or financial, in exchange for advantages or benefits, of direct or indirect interest.
- c) In situations where a public or private agent, national or foreign, makes a proposal that contradicts the guidelines of this Policy, it will be up to the people eligible for this Policy to refuse the proposal and, subsequently, alert the Compliance area of the Travelex Confidence Group about what happened, through the available channels, to take the appropriate measures.
- d) To ensure the correct progress of bids in which the Travelex Confidence Group may be a participant, employees, commercial partners and service providers involved in the bidding process must follow the provisions of item 8, iii, "b" of this policy. After winning the bidding process, or being legally bound to any contract with the Public Administration, national or foreign, it will be up to the Travelex Confidence Group to maintain an attitude of integrity in its relationship, ensuring that requests made are promptly met, only within the scope contracted, and that any situations that contradict the guidelines of this policy will be reported to the Legal, Compliance and Internal Audit Department, as well as to the Management of the Travelex Confidence Group.
- e) The Travelex Confidence Group must also guarantee that all payments made to public or private agents, national or foreign, have the appropriate tax receipt, restricting the existence of these transfers only to the legally contracted scope.
- f) Collaborators and third parties are expressly prohibited from giving, offering or promising, directly or indirectly, undue advantage to any public or private agent, national or foreign, or person related to them, especially for the purpose of:
 - i. Influence any act or decision of the agent to perform, omit, delay or speed up any act in violation of his legitimate or official duty;
 - ii. Obtain information regarding a fact or circumstance that the agent is aware of due to their duties and that must remain confidential;
 - iii. Carrying out an illegal act of any nature or an improper act against the Public or private Administration.

6. MANAGEMENT STRUCTURE

The structure for managing and mitigating the risks associated with corruption events, whether active or passive, is made up of the various areas that participate in the "know your client, partner, supplier, employee" process, with their respective roles and responsibilities, as provided for in the internal regulations, as well as specific registration, control and monitoring systems, aiming to ensure the efficiency, effectiveness and effectiveness of this management, in line with the Travelex Confidence Group strategy. This structure uses the governance established in the Group, through committees and authority levels established by management, which assist in the decision-making process.

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6.1. Management Process

6.1.1. Accounting Records

Records of all expenses incurred by the Travelex Confidence Group and its Employees, as well as all payments made, are duly recorded and entered in the accounting books in an accurate and clear manner. You must not hide the making of any payment by placing it in inappropriate accounts or covering up its making through adulterated or fictitious documents. Furthermore, the authority of each employee must be respected, and transactions can only be carried out with the appropriate approvals, as provided for in the Bylaws of the Travelex Confidence Group and other internal regulations.

6.1.2. Management of Compliance Risks and Exposure to Corruption

The Travelex Confidence Group has a structured process for identifying and mitigating compliance risks, which includes in its assessments, among other aspects, anti-corruption, conflict of interests and relationships with third parties. This process includes the classification of risks, considering aspects related to impact and probability, accompanied by a proposal for an action plan and a way to monitor the implementation of such measures.

6.1.3. Gifts, Gratuities, Giveaways and Entertainment

The Travelex Confidence Group prohibits the receipt and/or offering of any gift, gratuity, benefit, giveaway, meal, promotional item, entertainment, money or other item of value to public or private agents, national or foreign, as well as their families, clients or suppliers with the aim of influencing, hiring or obtaining undue personal advantage on behalf of the Travelex Confidence Group.

Before offering any type of hospitality, gratuities, gifts and entertainment, you must check whether local rules are being respected, as well as legislation dealing with transnational bribery (e.g.: FCPA, UK Bribery Act) and also whether the internal policies and rules of the institution of the person who will receive said hospitality are being obeyed.

When receiving and/or offering such hospitality, observing the prohibitions above, this must occur in a public manner, establishing a relationship in a clear and transparent manner, without any objective or favoritism or privileged treatment, complying with market values and in a manner and periodicity. moderate and can be analyzed on a case-by-case basis.

Said item must be read simultaneously with GRH-POC04 – Corporate Policy on the Code of Ethics and Conduct, available on the Intranet.

6.1.3.1. Donations, Contributions, Sponsorships and Social Actions

The Travelex Confidence Group is committed to supporting social causes, sometimes carried out through any donations, contributions and sponsorships with a focus on social development projects (sports, cultural, philanthropic), environmental, educational and those focused on health (humanitarian), whose values are compatible with the principles contained herein.

All donations, contributions, sponsorships and social projects must undergo prior due diligence by the beneficiary(ies) of any donation and/or sponsorship from the perspective

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of Money Laundering and Terrorist Financing Prevention ("PLDFT") and Compliance, Applicable legislation and tax collection must also be observed, when due.

Regarding sponsorships, they must have a counterpart, structured clearly and objectively in a contract determining benefits to their supporters.

6.1.4. Seals

- a) Any donation, sponsorship, contribution and social action that violates current regulations and internal regulations is prohibited;
- b) donations or contributions with the aim of financing electoral campaigns or political parties are prohibited, under the terms of Direct Action of Unconstitutionality 4,650, of 17/09/2015;

6.1.5. Visual Identity

The use of the Travelex Confidence Group's visual identity by the beneficiary of a donation, sponsorship, contribution or social action unconditionally and previously requires the analysis and approval of the Marketing area, for any beneficiary, including, but not limited to customers, business partners and the 3rd.

6.2. Monitoring Suspicious Operations

The monitoring of operations and suspected situations of Money Laundering and Terrorism Financing takes into account the analysis of operations and situations that may involve signs of active or passive corruption, and involvement with public or private, national or international agents. The PLDFT area is responsible for post-facto monitoring of operations, without compromising the performance of the Defense Lines in their other functions.

7. RESPONSIBILITIES

The areas and collegiate bodies that form the anti-corruption management structure of the Travelex Confidence Group act in accordance with the following responsibilities:

- a) Administrative Council:** Responsible for defining guidance for managing risks related to corruption in the Travelex Confidence Group, with approval of the Corporate Policy for preventing these risks being part of its duties.
- b) Board:** Responsible for ensuring the adequate and effective functioning of the corruption-related risk management structure. To this end, its main duties are to evaluate and monitor the structure, functioning and results of risk management related to corruption of companies in the Travelex Confidence Group.
- c) Employees, customers, business partners, service providers:** In relationships with or on behalf of the Travelex Confidence Group, it is the responsibility of direct and indirect employees, customers, business partners, outsourced service providers:
 - i. Do not make or accept any type of material or financial offer aiming to obtain advantages or benefits for yourself, third parties and/or the Travelex Confidence Group;
 - ii. Do not make prior contact with the bidding body in order to obtain advantages or benefits for yourself, third parties and/or the Travelex Confidence Group;

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- iii. Do not make any type of contact with competitors during the bidding process and/or use an intermediary to align rules and conditions in the bidding process in any way;
- iv. Inform the Compliance area about situations where advantages or benefits were offered in exchange for material or financial rewards;
- v. Inform the Compliance area in cases where bonuses, gifts and entertainment were offered to/from customers (or potential customers), business partners, service providers and customers that may suggest an intention to influence the person to take a certain action, observing the criteria and limits provided for in the Corporate Policy of the Code of Ethics and Conduct;
- vi. Maintain control over payments made to public bodies to avoid suspicious transfers.

8. IRREGULARITIES IN COMPLIANCE WITH POLICY AND PENALTIES

Indications of irregularities in compliance with the provisions of this Policy will be subject to audit and, upon ascertaining the actual irregularity, the employee, partner and/or outsourced service provider will be subject to the penalties applicable by the Travelex Confidence Group (including application of Just Cause or termination contractual), without prejudice to the adoption of other criminal measures applicable to the case.

It is worth mentioning that Travelex Confidence Group and its employees may be investigated by regulatory bodies, as well as by public justice, including in international jurisdictions and, depending on the circumstances, prosecuted administratively, civilly or criminally.

This may result in serious fines and penalties, exclusions and/or imprisonment if the Company and/or its Employees are found to be in violation of applicable anti-corruption and anti-bribery laws and/or regulations. For violating legal entities, the Anti-Corruption Law includes administrative and judicial sanctions.

9. REPORTING CHANNEL

Travelex Confidence Group requires individuals mentioned in the Corporate Integrity and Anti-Corruption Policy to report any act or indication of an act of corruption, payment or receipt of bribes, ensuring the protection of the ethical standards adopted by the Institution. To do this, consult the internal rules of the reporting channel, published on the intranet.

The Travelex Confidence Group will not tolerate retaliation against anyone who provides information in good faith about an alleged violation of the Code of Ethics, this Policy, other applicable policies or laws and regulations. False reports or acts of bad faith are considered crimes and, if cases of this nature are proven, the Travelex Confidence Group will take the appropriate applicable actions.

The reporting channel is available 24 hours a day and 7 days a week at the following accesses: [Reporting Channel](#) (Intranet), [Travelex Bank Reporting Channel](#) (Travelex Bank website) and [Confidence Corretora Reporting Channel](#) (Confidence Corretora website).

9.1. Other média

The Compliance area also has a communication channel with employees, to clarify doubts and provide guidance if necessary, via email address regulatoryio@travelexbank.com.br.

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The Travelex Bank Group in Brazil operates in perfect harmony with the provisions of the Anti-Bribery and Anti-Corruption Policy of the headquarters, located in the United Kingdom, which may be more restrictive and ensures its commitment to the highest levels of governance, in addition to applicable regulations and best practices of the market to properly mitigate risks and implement safeguards to prevent and detect inappropriate conduct that does not adhere to the principles of the Travelex Confidence Group.

11. EXCEPTIONS TO THE POLICY

All exceptions to the Policy must be submitted for analysis and approval by the Compliance area and Directorate and, when necessary, by the Executive Committee.

12. LINKED DOCUMENTS

- a) Law No. 12,846 August 1, 2013
- b) Febraban Self-Regulation - SARB Normative 021/2019 -Integrity program to prevent corruption and other acts harmful to national or foreign public administration
- c) FCPA - Foreign Corrupt Practices Act;
- d) UKBA - UK Bribery Act;
- e) GGIR-COD01- Code of Ethics and Conduct
- f) GGIR-POC01 - Corporate Financial Crimes Compliance Policy
- g) Anti-Bribery and Corruption Policy.

13. REVISION

This policy was reviewed, updated and approved by the executive committee on June 3, 2023. Subsequent reviews and updates should occur annually or in accordance with process reviews or adjustments to comply with legal or regulatory requirements.