



Social, Environmental and Climate Responsibility Policy (PRSAC)

Executive Summary

The Travelex Confidence Group is committed to acting with social, environmental and climate responsibility as a way of collaborating with the economic and social development of the Brazilian market in a sustainable manner, considering in its strategic objectives, actions proportional to its business model, the nature of its operations and the complexity of its products, services, activities, processes and regulatory environment.

In line with this premise, it makes its best efforts to comply with laws, regulations and best market practices related to the topic, especially CMN Resolution No. 4,945/21 and others related in this Policy.



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1. INTRODUCTION

The Travelex Confidence Group understands that acting with social, environmental and climate responsibility means acting diligently in its activities and relationships, offering products and services consistent with its values, dedicating its efforts to contribute to the sustainable development of the Group and society as a whole, respecting, protecting and promoting fundamental rights and guarantees of common interest.

Travelex Confidence Group is aware that the operation of its business impacts in many ways the workplace, the community and the environment in which its operations take place. The way we manage our business can and should make a positive difference in these areas, and the Group aims to ensure that continuous efforts are made to achieve these objectives, aiming in our strategic actions to preserve and repair the environment, including its restoration where possible, as well as our contributions to the transition to a low-carbon economy and the reduction of physical climate impacts.

2. OBJECTIVE

Present principles and guidelines that guide and direct the actions of the Travelex Confidence Group with regard to social, environmental and climate responsibility, as well as their respective risks.

This Policy establishes the necessary and required conditions for identifying social, environmental and climate risks related to the activities, products and services carried out by the Group.

3. APPLICABILITY

This Policy applies to employees, customers, business partners, suppliers and third-party service providers of the companies Travelex Banco de Câmbio SA and Confidence Corretora de Câmbio SA that make up the Travelex Confidence Group ("Group"), always considering the principles of Relevance (degree of exposure to social, environmental and climate risk). of the Group's activities and operations) and Proportionality (compatibility of the PRSAC with the nature of the Group and the complexity of its activities and its financial services and products).

4. CONCEPTS

Stakeholders: are customers, employees, service providers, business partners, suppliers, shareholders and society, impacted by your activities.

Social risk : is the possibility of losses occurring to the Travelex Confidence Group caused by events associated with the violation of fundamental rights and guarantees or harmful acts. in common

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interest.

Environmental risk : is the possibility of losses occurring to the Travelex Confidence Group caused by events associated with environmental degradation, including the excessive use of natural resources.

Climate risk: the possibility of losses occurring for the Travelex Confidence Group caused by events associated with the increase in greenhouse gas emissions; and physical climate risk: the possibility of losses occurring for the Travelex Confidence Group caused by events associated with frequent and severe weather events or long-term environmental changes, which may be related to changes in climate patterns.

5. GOVERNANCE

The Social, Environmental and Climate Responsibility Policy (PRSAC) establishes the necessary and required conditions for identifying social, environmental and climate risks related to the activities, products and services carried out by the Group.

The Travelex Confidence Group understands that acting with social, environmental and climate responsibility means acting diligently in its activities and relationships, offering products and services consistent with its values, strategic governance guidelines and actions to mitigate and reduce the impact of RSAC throughout its value chain, in order to contribute to the sustainable development of its business and society.

To this end, the attributions and responsibilities of the Group's bodies involved in managing these risks are defined, which is part of the culture and responsibility of all employees. However, their management is conducted by the following structure, where the key areas have the following attributions and responsibilities:

6. RESPONSIBILITIES

6.1 Board of Directors

- a) Approve and review the PRSAC, with the assistance of its responsible director.
- b) Receive input and participate in the decision-making process related to the establishment and review of the PRSAC
- c) Receive recommendations on the establishment and review of the PRSAC

6. 2. Risk Committee

The Travelex Confidence Group, in order to make the best efforts and effectiveness in managing the issue, established the ESG Subcommittee, which supports the competencies listed below assigned to the Monthly Risk Management Committee.

- a) Promote the adequate and reliable dissemination of the PRSAC and its implementation actions;

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- b) Evaluate and approve risk management reports and other relevant regulatory reports, if necessary;
- c) Participate and contribute to the decision-making process related to the establishment and review of the PRSAC, assisting the Board of Directors;
- d) Support the implementation of actions aimed at the effectiveness of the PRSAC, assessing the degree of adherence of the implemented actions;
- e) Monitor and evaluate the actions implemented;
- f) Request improvements to implemented actions when any deficiencies are identified;
- g) Ensure the Group's adherence to the PRSAC and actions aimed at its effectiveness;
- h) Ensure the compatibility and integration of the PRSAC with other policies established by the Group, including credit, human resources management, risk management, capital management and compliance policies;
- i) Ensure timely correction of PRSAC-related deficiencies;
- j) Ensure that the remuneration structure adopted by the Group does not encourage behavior that is incompatible with the PRSAC;
- k) Propose recommendations to the Board of Directors on the establishment and review of the PRSAC and maintain records of the recommendations.

The ESG Subcommittee ("Subcommittee") is a non-statutory, technical-advisory and permanent body, linked to and coordinated by the Risk Management Committee, which has the purpose of evaluating and proposing recommendations to the Board of Directors on the establishment and review of the PRSAC.

6.3 Human Resources

- a) Disseminate the values and principles that guide business and the relationship between employees and customers, suppliers, the internal community and other counterparts;
- b) Provide an environment of equality, diversity and inclusion for the Group's employees, through effective actions to comply with the definitions and strategic goals for the theme;

6.4 Legal

Ensure that the Group's contractual instruments and other official documents comply with legal and regulatory requirements and best practices in all its interactions with all its counterparties.

6.5 Products

Ensure that prior assessments of potential social, environmental and climate impacts are carried out of new types of products and services, as well as encouraging and guaranteeing, through these, opportunities that encourage and stimulate adherence to the Institution's strategic guidelines.

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Also responsible for observing this policy in the prior analysis of risks in the development and modification of products and services.

6.6 Regulatory Compliance

- a) Support the dissemination and strengthening of the culture of social, environmental and climate responsibility and ways of preventing associated risks;
- b) Recommend preventive actions or process review, as applicable, when non-compliance with this PRSA and applicable regulations is identified.

6.7 Financial Crimes Compliance

Consider the possible identification and assessment of social and environmental risk in the PLDFT analyses (prevention of money laundering and terrorist financing) carried out for customers, partners, suppliers and employees (KYC - Know Your Customer, KYP - Know Your Partner, KYS - Know Your Supplier, KYE - Know Your Employee) in the know your customer and monitoring processes, aligned with the strategy and appetite for these risks established by senior management.

6.8 Operational Risks and Internal Controls

- a) Monitor and report actual losses related to RSAC events on a loss basis, according to accounting accounts established in the Group's chart of accounts to account for losses arising from social, environmental and climate events;
- b) Monitor and evaluate mitigation plans for corrective actions resulting from the materialization of operational losses.
- c) Support the mapping of risks and controls with the highest degree of exposure and carry out timely tests to verify the degree of adherence to PRSAC, as well as its real and potential impacts, when considered relevant;
- d) Propose process improvement actions if any relevant risk is identified without due mitigation.

6.9 Financial Risk

- a) Assess the real and potential impacts, when considered relevant, of RSAC on the strategies adopted by the Group in its business;
- b) Perform, as defined by regulations, the execution of stress tests related to RSAC.
- c) Develop the policy and the correct adherence to the precepts described therein;
- d) Consolidate the SAC Risk Management Report, with support from all areas involved in this process.

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6.10 Credit Risk

- a) Assess the social, environmental and climate impacts of companies or projects susceptible to taking out credit;
- b) Measure sustainability and responsible social practices when granting credit, favoring companies and/or clients that demonstrate commitment to the precepts and certifications described in the PRSAC policies.
- c) Issue, in a format and frequency regulated by the Central Bank of Brazil, the document relevant to the DRSAC that will be sent by the Financial Risk area to the regulatory body.

6.11 Facilities

- a) Measure energy and water consumption. Propose measures to improve efficiency, if applicable;
- b) Promote awareness campaigns on the rational use of energy and water resources;
- c) Ensure that waste management complies with PRSAC;
- d) Promote that the maintenance and/or adaptation of the internal and external environments of offices/stores are carried out through the contracting of services that use clean technologies and preserve the environment.

6.12 Other Areas of the Group

Act in accordance with current internal and external regulations related to social, environmental and climate responsibility in its activities and relationships with stakeholders.

7. MANAGEMENT OF SOCIAL, ENVIRONMENTAL AND CLIMATE RISKS

Activities related to the management of social, environmental and climate risk comply with the principles of relevance (degree of exposure to socio-environmental risk of the Group's activities and operations) and proportionality (compatibility of the PRSAC with the nature of the Group and the complexity of its activities and its financial services and products).

The real and potential impacts of socio-environmental risk on the strategies adopted by the Group in its business are assessed, when considered relevant, and the following stand out among the actions related to the management and control processes of such risks, subordinate to the Risks area:

- a) The development and monitoring of systems, routines and procedures that enable the identification, classification, evaluation, mitigation and control of RSAC present in the

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institution's activities and operations;

- b) The recording and maintenance of data relating to actual losses due to social, environmental and/or climate damage for a minimum period of five years, including values, type, location and economic sector subject to the operation;
- c) Prior assessment of potential negative RSAC impacts of new types of products and services, including in relation to image risk;
- d) Procedures for adapting RSAC management to legal, regulatory and market changes.

8. POSITIONING OF THE TRAVELEX CONFIDENCE GROUP

8.1 Customers, Partners and Suppliers

The acceptance criteria for the beginning and maintenance of relationships with customers, employees, service providers, business partners and suppliers adopted by the Travelex Confidence Group include, but are not limited to, checking for the existence of breaches related to environmental damage, slave labor, child labor, sexual exploitation, corruption and any practice that violates human rights, through consultations with national sanctions lists, such as IBAMA, the Ministry of Labor and Employment, Justice and Government Agencies and the main international sanctions lists (publicly accessible and contracted by third parties), which include OFAC, FATF, UN, European Union Sanctions and the United Nations Security Council. There are restrictions on operations with companies that use slave labor and child labor.

Interested parties that appear to have restrictions with these bodies will be duly analyzed and taken to the competent authority for deliberation on the beginning or maintenance of the relationship and other actions deemed necessary.

Activities related to the management of Social, Environmental and Climate Risk comply with the principles of relevance (degree of exposure to socio-environmental risk of the Group's activities and operations) and proportionality (compatibility of the PRSAC with the nature of the Group and the complexity of its activities and its financial services and products).

ESG Risk assessments will be carried out for Credit counterparties, following the eligibility criteria established in internal policy, as part of the risk assessment process. As a Group strategy, ESG risk assessments are not applicable to clients that do not have credit exposure .

8.2 Diversity and Inclusion

Our employees are our greatest asset, which is why we seek to build a talented, committed and loyal team to retain and maintain these people.

For this reason, we are committed to providing an environment of equality, diversity and inclusion for all colleagues and encouraging a supportive and inclusive culture, free from discrimination. We value people as individuals with diverse views, cultures, lifestyles and

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circumstances. We do not tolerate direct or indirect discrimination, harassment, bullying or any behaviour that may lead to colleagues, customers, stakeholders and anyone else we may impact.

Such provisions are set out in our Code of Ethics and there is an Institutional Policy and Governance that provides for management of consequences for non-compliance with the guidelines set out therein.

8.3 Social Actions

The Travelex Confidence Group, attentive to social issues, seeks to promote actions aimed at accelerating the adoption of good practices, as well as contributing to the reduction of social impacts through its business.

Among the related actions, the following stand out:

- a) Support for accelerating gender representation and strengthening the culture of inclusion and racial diversity;
- b) Encouragement of projects in the areas of culture, education and sports;
- c) Encouragement of ethical and transparent behavior by providing accessible and appropriate reporting channels (telephone and/or form);

8.4 Environmental Actions

Following good practices in Environmental Management and combating climate change, the Travelex Confidence Group has the following guidelines:

- a) Measurement and management of the consumption of natural resources with the aim of improving energy and water efficiency;
- b) Measurement and management of waste generation.

8.5 Climate Actions

In order to ensure that our business is prepared for climate challenges, the Travelex Confidence Group has the following practices in place:

- a) Offer financial solutions that encourage the transition to a low-carbon economy;
- b) Adoption of practices that are aligned with environmental protection and rational use of natural resources;
- c) Inclusion of climate variables in risk management.

9. DISSEMINATION AND ADVERTISING

The guidelines related to SAC responsibility adopted by the Travelex Confidence Group are disseminated through this Policy, whose internal publication (intranet) guarantees access to all employees and outsourced service providers, and external publication (on the institutional websites of Travelex Banco and Confidence Corretora) allows access to customers, business partners, suppliers and other interested parties.

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However, in compliance with regulatory requirements, the Travelex Confidence Group will publish, according to the frequency defined by the Central Bank of Brazil, the actions taken to comply with and ensure the effectiveness of this Policy on its website.

The Compliance Area is responsible for ensuring that the Travelex Confidence Group is in compliance with regulatory requirements for preparing and making these reports available to the public and the Central Bank, within the deadlines required by this agency.

10. RELATED INTERNAL DOCUMENTS

- GGIR-POC08 - Corporate Policy for Integrated Risk Management
- GGIR-NOR39 - Financial Crimes Compliance Standard

Document	Description	Validity
Resolution No. 4,945, of 09/15/2021	Provides for the Social, Environmental and Climate Responsibility Policy (PRSAC) and actions aimed at its effectiveness.	From 01/07/2022
Resolution No. 4,943, of 09/14/2021	Amends Resolution No. 4,557 of February 23, 2017, which provides for the risk management structure, the capital management structure and the information disclosure policy.	From 01/07/2022
Resolution No. 4,557, of 23/02/2017	Provides for the risk management structure, the capital management structure and policy disclosure of information.	From 01/03/2017

11. REVISION

This policy was reviewed, updated and approved by the board of directors on October 21st. 2024. Subsequent reviews and updates should occur annually or as process reviews or adjustments to comply with legal or regulatory requirements.