

**CORPORATE COMPLIANCE AND
ANTICORRUPTION POLICY**

BEETELLER GROUP

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SUMMARY

1. DEFINITIONS.....	3
2. APPLICABLE STANDARDS.....	4
3. POLICY OBJECTIVES	5
4. SCOPE OF THIS POLICY	6
5. ATTRIBUTIONS OF THE COMPLIANCE AREA.....	6
6. STANDARDS OF CONDUCT AND ANTI-CORRUPTION RISK MANAGEMENT ..	7
a. RELATIONSHIP WITH THE PUBLIC SECTOR.....	8
b. GIFTS, ENTERTAINMENT AND HOSPITALITY	9
c. ACCOUNTING RECORDS AND CONTROLS.....	9
d. CONTRACTING OF THIRD PARTIES.....	9
e. CONTRIBUTIONS, SPONSORSHIPS AND DONATIONS	10
7. REPORTING CHANNEL	10
8. COMMUNICATION AND TRAINING	10
9. GENERAL PROVISIONS	11
APPENDIX 1	12
APPENDIX 2.....	13

1. DEFINITIONS:

Words and expressions indicated by the first or all capital letters shall have the definitions below, without prejudice to other definitions indicated in this Policy:

- **ADMINISTRATORS:** Formed by the directors of the "BEETELLER GROUP"
- **PUBLIC ADMINISTRATION:** Set of agencies, services, and entities that directly or indirectly (foundations, autarchies, public companies, mixed economy companies, concessionaires, or permissionaries) are linked to the Powers of the Union, the States, the Federal district, or the Municipalities.
- **PUBLIC AGENT:** Everyone who exercises, even if temporarily or without remuneration, by election, appointment, designation, contracting or any other form of investiture or bond, a mandate, post, employment, or public function.
- **COMPLIANCE AREA:** Specific area at BEETELLER, responsible for ensuring that all internal procedures and applicable legislation are followed in this Policy, establishing a compliance program compatible with BEETELLER's nature, structure, risk profile and business model, as well as creating and managing the control mechanisms that can ensure the management of risks related to anti-corruption, ensuring ethics in BEETELLER's conduct
- **REPORTING CHANNEL:** Tool through which Employees and Managers of BEETELLER, as well as Suppliers, may make their reports and open incidents whenever they identify any non-compliance, signs of corruption or deviation of conduct or ethical standard they deem attributable to BEETELLER.
- **CUSTOMERS:** are the users, natural or legal persons, who, by becoming eligible to adhere to the terms for opening Payment Accounts, to use BEETELLER's products and/or services, are enabled to make Transactions through the Payment System, as well as those who hire BEETELLER's services to initiate the payment transaction before the institution holding their account.
- **EMPLOYEES,** non-employee service providers, trainees and interns of BEETELLER.
- **COMPLIANCE:** Set of rules and procedures aimed at making BEETELLER compliant with the laws and regulations applicable to it, as well as with its internal rules and aimed at promoting an organizational culture that encourages ethical conduct and a commitment to compliance with the law, always observing the principles of ethics, transparency and corporate integrity.
- **CORRUPTION:** Harmful act against the public administration, national or foreign, which attacks the national or foreign public patrimony, against principles of public administration or against international commitments assumed by Brazil, as better defined in the applicable legislation.
- **DUE DILIGENCE:** Investigation process of responsibility of the *Compliance* Area, which involves the study, analysis and detailed evaluation of information by BEETELLER, before starting relationships, projects and partnerships with Customers and Suppliers, which seek to identify and evaluate the business opportunity that does not compromise the strategy, reputation and performance of BEETELLER in the market.
- **SUPPLIERS:** every individual or legal entity, public or private, national or foreign, as well as the unidentified entities, which develop activities of commercialization of products or rendering of services to BEETELLER.
- **SUBORN:** According to ISO 37001, bribery is characterized as: "the offering, promising, giving, accepting, or soliciting of an improper advantage of any value (which may be

financial or non-financial), directly or indirectly, and regardless of location(s), in violation of applicable laws, as an inducement or reward to a person who is acting or failing to act properly in connection with the performance of his or her duties."

- **UNDUE ADVANTAGE:** It is any type of profit, gain, privilege or illicit benefit, contrary to legal rules and that may characterize the crime of passive corruption.

2. APPLICABLE STANDARDS

- **LAW No. 12,846/2013:** Anticorruption Law, which instituted in Brazil the objective administrative and civil accountability of legal entities for the practice of harmful acts that are committed in their interest or benefit, against the public administration, domestic or foreign.
- **LAW No. 12,865/2013:** provides for the Payment Arrangements and Payment Institutions integrating the Brazilian Payment System (SPB).
- **DEC. No. 11,129/2022:** Regulates the Anticorruption Law of 2013.
- **BCB RESOLUTION N° 65/2021:** Provides for the compliance policy of Payment Institutions.
- **BCB RESOLUTION No. 150/2021:** Provides for payment arrangements, approves the regulation that governs the provision of payment services in the scope of the payment arrangements that are part of the Brazilian Payment System (SPB).
- **BCB RESOLUTION No. 01/2020:** Establishes the PIX payment arrangement and approves its Regulation.
- **BCB RESOLUTION N° 80/2021:** establishes the requirements and procedures for the constitution and operation, and for the application for authorization to operate of Payment Institutions and provides for the rendering of payment services by other institutions authorized to operate by the Bacen.
- **CGU ORDINANCE No. 909/2015:** Provides for the evaluation of integrity programs of legal entities.
- **UNCAC:** Adopted by the United Nations General Assembly in 2003, the United Nations Convention against Corruption is the only universal legally binding anti-corruption instrument.
- **U. S. FOREIGN CORRUPT PRACTICES ACT - FCPA:** A United States law passed in 1977 that prohibits and holds individuals and corporations accountable for corruption of foreign public officials.
- **UNITED KINGDOM BRIBERY ACT - UKBA:** A 2010 UK law that makes companies liable for acts of corruption committed by people acting on their behalf.

The above laws and norms are mentioned as examples and do not exhaust all the Applicable Legislation to BEETELLER's activities regarding *Compliance* and anti-corruption.

The rules are cited for the knowledge of Employees, and the *Compliance* Area is responsible for checking any updates, revocations or publication of new standards. In case new rules require changes to this Policy, BEETELLER will promote its review.

3. POLICY GOALS

The purpose of this Policy is to define the guidelines on which BEETELLER bases its Corporate Compliance and Anti-Corruption program applicable to its Managers, Employees, Customers

and Suppliers. This Policy was designed to be compatible with the nature, size, complexity, structure, risk profile and business model of BEETELLER and to ensure the effective management of its risk before the Bacen, other public authorities and best practices.

This Policy seeks to define some procedures, rules and internal controls related to Compliance, in order not to allow BEETELLER to suffer legal or administrative sanctions, financial losses, damage to reputation and other damages, resulting from non-compliance or failure to comply with the legal framework, the infra-legal regulation, the recommendations of regulatory agencies and applicable self-regulation codes, which may eventually be better detailed in internal manuals.

In addition to provisions of Resolution BCB No. 65/2021 (Compliance of Payment Institutions), contained in this Policy, BEETELLER also observes the guidelines of law 12,846/2013 (Anti-corruption Law), and the requirements of the *Compliance* Regulatory Integrity Program and Guidelines for Private Companies published by the Office of the Comptroller General - CGU, Ordinance No. 909/2015, to prevent and combat situations prone to acts of corruption, bribery and fraud, both in relation to public institutions and private companies.

The pillars of BEETELLER's Compliance program are

Compliance:

- the support of top management;
- BEETELLER's *Risk Assessment*;
- the alignment of this Policy with BEETELLER's internal procedures and controls;
- the realization of communication and training aimed at disseminating the culture of *Compliance* within BEETELLER;
- the complaint and ombudsman channels;
- the internal investigations and reporting;
- performing internal and third-party *due diligence*, Customers and Suppliers; and
- auditing and monitoring the Corporate *Compliance* and Anticorruption programs.

Furthermore, this Policy defines:

- the purpose and scope of the *Compliance* function;
- the clear division of responsibilities of the people involved in the compliance function, in order to avoid possible conflicts of interest, especially with BEETELLER's business areas;
- the allocation of sufficient personnel, adequately trained and with the necessary experience for the performance of the activities related to the *Compliance* function;
- the position, in BEETELLER's organizational structure, of the *Compliance* Area;
- the necessary measures to ensure independence and adequate authority for those responsible for activities related to the compliance and anti-corruption function of the *Compliance* Department at BEETELLER;
- the free access of those responsible for the Compliance Area to the information necessary for the performance of their activities;
- the direct communication channels with BEETELLER's Directors, for reporting the results arising from the activities related to the compliance and anti-corruption function, possible irregularities or failures identified; and
- the procedures for coordinating the activities related to the *compliance* function with risk management functions and internal audit.

Specifically with regard to anti-corruption, this Policy aims to expressly prohibit and, if

necessary, repress any conduct of any recipient, whether a Manager, Employee, Customer or Supplier who, when interacting with a Public Official or others on behalf of BEETELLER, promises, authorizes, offers or grants, directly or indirectly, payment of any article of any nature to a Public Official or to any individual or legal entity with the aim of obtaining any undue advantage, even if non-monetary, for BEETELLER, for himself or for a third party.

4. SCOPE OF THIS POLICY

This Policy covers all departments of BEETELLER, and its Directors and Employees, who shall agree, adhere and be bound to comply with what is established herein.

It will be through the *Compliance* Area the monitoring and coordination of the performance of those responsible for the execution of daily activities, and the adherence of BEETELLER to this Policy, the legal framework, the infralegal regulation, and the strategies of BEETELLER.

The *Compliance* Area periodically performs a risk assessment that takes into account the characteristics of the businesses, markets, Customers and Partners where BEETELLER operates (local culture, level of state regulation, history of corruption).

The *Compliance* Area has autonomy, with regard to the communication channels with the Administrators, to report the results arising from the activities related to possible irregularities or failures identified, and the audit procedures referred to in this Policy.

5. ATTRIBUTIONS OF THE COMPLIANCE AREA

The *Compliance* Department will be responsible for ensuring that all internal and external regulations to which BEETELLER is bound are complied with.

This is BEETELLER's *Compliance* Area, which shall, under the supervision of the Directors, promote the organizational culture of compliance and anti-corruption, including all Employees.

The *Compliance* Area must adopt specific rules that regulate situations that commonly involve risks, including those related to corruption or ethical deviations by its Clients, Collaborators, and Suppliers, such as: accounting control registration procedures, contracting third parties, sponsorships and donations, moral harassment, bribery practices, undue advantages, and racial, social, physical, sexual, and religious prejudice practices.

It is the *Compliance* Area's responsibility, under the Directors' supervision, to create and manage the control mechanisms for Corporate Compliance and Anti-Corruption, ensuring ethics in BEETELLER's conduct, as well as to create and coordinate the training programs, the pillars of the *Compliance* program, provide support to BEETELLER's senior management regarding the observance and correct application of this Policy and its periodic reviews.

It will also be up to the *Compliance* Area to create the corporate communication and the performance mechanisms for the Reporting Channel, whose objectives are the compliance of internal processes and the fight against corruption and adherence to this Policy.

It is also the duty of the Compliance Area:

- testing and assessing BEETELLER's adherence to the legal framework, infra-legal regulations, recommendations of supervisory bodies and, where applicable, other

regulations with which BEETELLER is required to comply;

- provide support to the Managers regarding the compliance and correct application of the rules, guidelines and legal precepts of this Policy;
- assist in informing and training all Clients and Employees on *Compliance and* anti-corruption issues;
- reviewing and following up the solution of the points raised in the report of non-compliance with legal and regulatory provisions prepared by the independent auditor, according to specific regulations;
- elaborate a report, at least annually, containing a summary of the results of the activities related to the *Compliance* function, its main conclusions, recommendations, and actions taken by the Administrators;
- systematically and timely report the results of activities related to the *Compliance* and Anticorruption function to the Administrators, and keep at the disposal of the Central Bank of Brazil the annual reports prepared, for a minimum period of 5 (five) years.

6. STANDARDS OF CONDUCT AND ANTI-CORRUPTION RISK MANAGEMENT

BEETELLER, in addition to adopting the procedures and compliance standards set forth in Resolution BCB No. 65/2021, which relate to the regulation of the *compliance* policy applicable to Payment Institutions, also adopts standards of ethics and conduct that represent the expected behavior of all its Customers and Employees with respect to anti-corruption.

Thus, BEETELLER, through this Policy, also aims to meet the requirements of the Regulatory Compliance of the Integrity Program and Guidelines for Private Companies published by the Office of the Comptroller General - CGU, 2015 (Ordinance No. 909/2015), created after the Anti-Corruption Law of 2013 - Law No. 12,846/2013, where BEETELLER, is expected to have:

- the commitment of the Top Management, evidenced by visible and unequivocal support for the program.
- standards of conduct, integrity policies and procedures, applicable to all Employees and Customers;
- periodic training on the integrity program;
- periodic risk analysis to make the necessary adaptations to the integrity program;
- accounting records that completely and accurately reflect BEETELLER's transactions;
- the internal controls that ensure the prompt preparation and reliability of BEETELLER's reports and financial statements;
- independence, structure, and authority of the Compliance Area, which is responsible for applying the integrity program and overseeing its compliance;
- channels for whistleblowing, open and widely disseminated to employees and third parties, and mechanisms to protect whistleblowers in good faith;
- disciplinary measures in case of violation of the integrity program, and procedures that ensure the prompt interruption of detected irregularities or infractions and the timely remediation of the damage generated;
- appropriate due diligence for contracting and supervision of Suppliers, and intermediary agents; and
- continuous monitoring of the integrity program aiming at its improvement in preventing, detecting and combating the occurrence of acts harmful to the national or foreign public administration.

The rules and procedures to prevent and detect the occurrence of irregularities must be coordinated and applied in BEETELLER's work routine, through the *Compliance Area* and other business areas of the institution, where specific obligations and actions will be assigned, such as procedures, target audience, periodicity, responsible units and forms of monitoring.

The following are some examples of standards of conduct and risk management, taking into consideration the nature, size, complexity, structure, risk profile and business model of BEETELLER.

a. RELATIONSHIP WITH THE PUBLIC SECTOR

BEETELLER does not allow anyone on its behalf to seek advantage in contracting with the Government. Those responsible for activities associated with such contracting at BEETELLER must ensure that no improper or pecuniary advantage is offered or received.

In addition, always, the evaluation of public contracting must go through BEETELLER's Directors and will be subject to resolution, which shall be formalized in writing and stored at BEETELLER's headquarters.

BEETELLER does not authorize anyone to offer, on its behalf, any undue advantage to public officials in order to hasten or facilitate the obtaining of certificates, licenses, authorizations or permits.

Any inspections by the government that BEETELLER may undergo must be accompanied directly by the Administrators and by the *Compliance Area*. Under no circumstances should one hinder the actions of the inspectors, as well as under no circumstances offer bribes, undue or pecuniary advantages, or give in to requests with the aim of influencing the results of the inspections.

b. GIFTS, PRESENTS, ENTERTAINMENT AND HOSPITALITIES

The Policy and the rules covering the receipt or delivery of gifts, presents, the offering or receiving of entertainment and hospitality, both with private agents and Public Agents are described in BEETELLER's Code of Ethics and Conduct, which establishes the prohibitions, maximum values and the procedure for documentation, scopes and approval of any exceptions.

BEETELLER shall, through the *Compliance Area*, create the rules on the values of gifts that public and private agents may receive, as well as the offering of gifts or travel expenses that may be used to conceal the payment of undue advantages, and the company's integrity policy and procedures must be adequate to prevent this type of situation. Obviously, this is not to condemn the usual and legitimate practices that are part of the business.

c. ACCOUNTING RECORDS AND CONTROLS

The *Compliance Area*, under the guidance and production assistance of the Finance Department, must establish strict procedures for the accounting registration and identification of acts of corruption. Preventing the practice of bribery, or other illicit practices, from being disguised in the accounts as legitimate payments such as commissions, consultancies, travel

expenses, scholarships, entertainment, etc.

BEETELLER will adopt processes for the accounting records to be more detailed, analytical, and with a history prepared for situations of justifications related to the need to contract services, information about the contracted price and market price, justification for eventual payment of amounts above market value, information about the delivery of the product or service, and comments about the quality of the service provided compared to the amount paid.

The *Compliance* Area will keep records in such a way as to allow the monitoring of expenses and revenues, facilitating the detection of illicit acts, the identification of atypical features of transactions or changes in revenue patterns (accentuated and unforeseen increase in public procurement in a region, for example) or in expense patterns (contracting services at above market value or accentuated reduction in the amount paid for a certain tax, for example).

d. CONTRACTING OF OTHERS

The *Compliance* Area will adopt appropriate procedures for verification of hiring and supervision of Suppliers, in order to reduce the chances of BEETELLER becoming involved in cases of corruption or fraud in bids and contracts, even if the hiring of these Suppliers does not have the immediate objective of intermediating the relationship with the public administration.

The *Compliance* Area will perform *due diligence* for the contracting of these Suppliers, in order to check if they have a history of involvement in harmful acts against the public administration, as well as if their companies have an Integrity Program that reduces the risk of irregularities and is in accordance with BEETELLER's ethical principles.

BEETELLER, through its *Compliance* Area, may, at its discretion, adopt ways to periodically verify whether its Suppliers are acting in a manner consistent with what was agreed in contract and that they do not adopt behaviors contrary to this Policy and its values, or the laws.

c. CONTRIBUTIONS, SPONSORSHIPS AND DONATIONS

Any contribution, sponsorship or donation, as well as other offers of similar nature, can only be made to beneficiaries and sponsored parties, on behalf of BEETELLER, after prior evaluation by the *Compliance* Area, and approval by the Directors.

Even if it is eventually considered a legal procedure, BEETELLER will under no circumstances make any donation or contribution that has political connotation, such as donations or contributions to political parties, unions, politicians or foundations linked to political parties.

If an Employee eventually makes a contribution or donation of a political nature, he/she must make it clear in all documents formalizing the contribution or donation that such act has no connection with BEETELLER, but that it is a personal/independent act. While this Policy has no power to prohibit such acts, it strongly discourages them.

7. REPORTING CHANNEL

BEETELLER shall create the Whistleblower Channel, which shall be the responsibility of the *Compliance* Area, and which shall hear, report, conduct, conclude and report the results of possible irregularities or failures identified in BEETELLER's day-to-day activities. The

Compliance Area will investigate the reports received and forward the case, along with its evaluation, for decision by BEETELLER's Directors to apply any disciplinary measures and remedial actions. Confidentiality will be observed in the treatment and conduct of the investigations of the complaints, aiming at the protection of the whistleblower.

The Reporting Channel will be available through the e-mail address denuncia@beeteller.com and will be responsible, together with the *Compliance* Area, for monitoring the Corporate *Compliance* and Anti-Corruption program, as well as for assisting in the prevention and detection of misconduct, and may be accessed by BEETELLER's Employees and Customers, who may make their reports and open incidents whenever they identify any deviation in conduct or ethical standard of operations involving BEETELLER.

8. COMMUNICATION AND TRAINING

The responsibility for communicating and training all areas of BEETELLER lies with the *Compliance* Department. It shall prepare all appropriate documentation to guide and manage this Policy.

The training and capacity building on the topics of this Policy will cover BEETELLER's Employees. Training will be held periodically for all BEETELLER, and for new employees who join BEETELLER

Communication of this Policy aims to disseminate standards of integrity and ethical conduct as part of BEETELLER's culture, as well as to ensure that corrective action is taken when compliance failures or acts of corruption are identified.

This Policy, rules and procedures will be available electronically to all interested parties.

4. GENERAL PROVISIONS

The *Compliance* Area is responsible for reviewing, amending and updating this Corporate *Compliance* and Anti-Corruption Policy, whenever necessary for the good functioning of BEETELLER's good governance practices.

The *Compliance* Policy shall be approved by the Directors, and recorded in minutes, and shall ensure: (a) the proper management of this Corporate Compliance and Anti-Corruption Policy at BEETELLER; (b) the effectiveness and continuity of the application of this Policy; (c) the communication of this Policy to all Employees, Suppliers and Customers; (d) the dissemination of standards of integrity and ethical conduct as part of BEETELLER's culture; (e) ensure that corrective measures are taken when compliance failures or acts of corruption are identified; and, (f) provide the means necessary for the activities related to the *Compliance* and Anti-Corruption function of this Policy to be exercised properly.

This Policy, as well as the report to be prepared containing the summary of the results of the activities related to the compliance function, its main conclusions, recommendations and actions taken by BEETELLER and its Directors, shall be reviewed every 12 months by the Compliance Area, and approved by BEETELLER's Directors.

Whenever there is a relevant alteration to this Policy, there will be new Communication and Training cycles, to be coordinated by the *Compliance* Area.

All the Collaborators shall sign, at the beginning of the relationship with BEETELLER or whenever there is a relevant change, the adhesion agreement or the term of knowledge of the changes in this Policy, as applicable.

It is the duty of the *Compliance* Area to keep at the disposal of the Central Bank of Brazil documents, minutes, reports, risk assessments and manuals that this Policy deals with.

APPENDIX 1

ADHESION FORM OF THE CORPORATE COMPLIANCE AND
ANTI-CORRUPTION POLICY

I, _____ enrolled in the CPF under
no. _____ I am aware of this
Corporate *Compliance* and Anti-Corruption Policy, as well as of the guidelines contained
in the other policies, rules and internal procedures of BEETELLER.

I also declare that I am aware of BEETELLER's activities, its compliance and integrity
standards, and the extent to which it may try to be used to practice acts of non- compliance
or corruption. Therefore, within my duties and obligations, I must, whenever necessary,
use the Reporting Channel to report any type of suspicious activity and/or treated as
criminal by this Policy and by BEETELLER.

_____/_____/_____
Date

Signature

APPENDIX 2

**TERM OF ADHERENCE TO THE AMENDMENTS TO THIS CORPORATE COMPLIANCE
AND ANTI-CORRUPTION POLICY**

I, _____ enrolled in the CPF under no. _____ I am aware of the changes made in this Corporate *Compliance* and Anti-Corruption Policy, as well as of the guidelines contained in the other policies, rules and internal procedures of BEETELLER.

I also declare that I am aware of BEETELLER's activities, its compliance and integrity standards, and the extent to which it may try to be used to practice acts of non-compliance or corruption. Therefore, within my duties and obligations, I must, whenever necessary, use the Reporting Channel to report any type of suspicious activity and/or treated as criminal by this Policy and by BEETELLER.

_____/_____/_____
Date

Signature

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