

Travelex

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Grupo
Confidence

Code of Ethics and Conduct

Executive summary

The Code of Ethics and Conduct aims to establish and disseminate the principles, values, guidelines, standards of conduct and commitments that guide the internal and external relations of the Travelex Confidence Group.



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Code of Ethics and Conduct

1. GOAL

The Code of Ethics and Conduct aims to establish and disseminate the principles, values, guidelines, standards of conduct and commitments that guide the internal and external relations of the Travelex Confidence Group, to be followed by Senior Management, employees, interns, minor apprentices, temporary workers, business partners, and may be transmitted to customers and any interested party, aiming to obtain ethical and conduct standards, defining responsibilities and the due maintenance of the preservation of the image of the Travelex Confidence Group.

2. SCOPE AND APPLICABILITY

This Code applies to Senior Management, employees, interns, apprentices, temporary workers, business partners of the Travelex Confidence Group (or "Group"), formed by Travelex Banco de Câmbio SA and Confidence Corretora de Câmbio SA

3. CONCEPTS

Senior Management, employees, interns, underage apprentices, temporary workers, business partners: Target audience of this Code, herein referred to as "employees";

Conduct: Act in accordance with current legislation and regulations (domestic and foreign, applicable to the businesses and relationships established by the Travelex Confidence Group), within the highest ethical and conduct standards.

Ethics and legality: Misconduct or lack of professional ethics is any act or action that goes against the set of values, norms and conduct that guide and raise awareness of the attitudes and behavior of a professional in the organization. Ethical misconduct impacts the progress of internal processes, productivity and achievement of goals;

Integrity and Compliance Program: Working with integrity means adhering to values, principles, norms and ethical conduct, respecting the interests of the Travelex Confidence Group above personal desires, in order to implement a culture of awareness, prevention, detection and remedy of atypical situations. For more information, access GGIR-POC16 – Corporate Compliance Policy;

4. RESPONSIBILITY

Updating and maintaining this Code is the responsibility of the Compliance area. However, every employee of the Travelex Confidence Group has the duty to know and comply with the guidelines set forth herein.

5. PRINCIPLES

- a) Compliance with and adequate treatment of legislation and internal and external regulations (domestic or foreign laws, regulations, recommendations and guidelines from regulatory and self-regulatory entities);
- b) Fostering an ethical and compliance culture with employees and service providers, by reading internal regulations, training and/or specific communications;
- c) Impartiality in professional relationships, whether aimed at the client or other institutions in the financial market, partners or not, fair and respectful treatment must be given, where competitiveness is based only on the quality of care, services and product prices;

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- d) Customers must be given dignified, attentive and respectful treatment, seeking to serve them efficiently and in a clear and unequivocal manner;
- e) Transparency and fidelity of information are essential for maintaining the image of the Travelex Confidence Group, so that we maintain the excellence built over the years.

6. CORPORATE GUIDELINES

6.1 Travelex Confidence Group Commitment

Awareness of social responsibility and adoption of moral values, valuing interpersonal and commercial relationships, acting in a fair and impartial manner, through awareness of an ethical environment.

6.2 Discrimination

We repudiate and reject any discrimination based on race, religion, age, gender, sexual orientation, social class, training or physical limitation, both in the internal environment and in the external relations of the Travelex Confidence Group and, in the face of any such incident, these may be reported on the Reporting Channel, as provided for in item 7.2.

6.3 Prevention of Money Laundering and Financing of Terrorism

Firm performance in the disclosure, training and dissemination of a set of principles, guidelines and responsibilities with the objective of preventing the risks of money laundering and terrorist financing, in line with the best market practices, considering the nature and complexity of the products, services, activities, processes, systems and compliance with regulatory requirements, reinforcing the Travelex Confidence Group's commitment to the effectiveness and continuous improvement of its internal controls. More information can be obtained in GGIR-POC01 – Corporate Policy for the Prevention of Money Laundering and Terrorism Financing.

6.4 Fraud Prevention

We act strongly in the fight against internal/external fraud, including accounting fraud, being any cunning, misleading, bad faith act, with the intention of harming or deceiving others, or of not fulfilling a certain duty, either internally or by a client, partner of business or supplier subject - not only to disciplinary action, but may also result in criminal prosecution and/or civil action. More information can be found in GGIR-NOR20 – Fraud Prevention Rule and GGIR-NOR03 – Reporting Channel Rule.

6.5 Conflict of interest

Acting without a conflict of interest means refraining from using undue influence through the Travelex Confidence Group's resources or reputation for its own benefit or that of clients, and avoiding activities or external influences that conflict with the performance of its responsibilities, interfering with the legal performance, transparent, reliable and honest. In addition, there is a risk of exposure, in whole or in part, to the Group's reputation and image.

6.6 Activities Outside the Organization

Employees of the Travelex Confidence Group are not allowed to maintain external professional activities in regular or temporary work at another Financial Institution; use resources belonging to the Travelex Confidence Group, such as technological support, telephone and other materials for activities that do not concern it; use the name of the Travelex Confidence Group to start

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and/or perform external work and/or in lectures, courses and other presentations given by employees, without prior authorization from the competent area; provide services to customers of the Travellex Confidence Group.

6.7 Hiring Relatives

It is expressly prohibited to hire blood relatives for a position directly or indirectly subordinated to an immediate family member (mother, father, child, spouse, father-in-law, brother, brother-in-law, uncle, first cousin), and must be communicated to the Human Resources area, through the GRH-NOR21-A1 - Declaration of Impartiality, for exclusive use of the area

Any activity related to the indication/contracting of services provided by suppliers in which direct family members have some connection (society, employment contract or service provision) must be communicated to the Human Resources and Compliance area.

6.8 Diversity

Diversity represents the union of pluralities, varieties, differences living in harmony, with respect and, above all, aiming at a fairer and more inclusive society.

6.9 Gifts, Gratuities, Gifts and Entertainment

The Travellex Confidence Group allows the receipt and/or offering of any gift, gratuity, benefit, gift, meal, promotional item, entertainment, or other item of up to USD100, provided that they are not intended to influence, contract or obtain undue personal advantage and/or on behalf of the Travellex Confidence Group.

Before offering any type of hospitality, gratuities, gifts and entertainment, check whether the local rules are being respected, as well as the laws that deal with transnational bribery (eg FCPA, UK Bribery Act) and, also, whether the internal policies and rules of the institution of the one who will receive said hospitality are being obeyed.

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

If the value of hospitality exceeds USD 100, it is the responsibility of the employee to refuse it or, failing that, request recommendations from the Human Resources and Compliance area, under penalty of administrative measures. Said item must be read concurrently with GGIR-POC15 – Corporate Integrity and Anti-Corruption Policy.

6.10 Confidentiality of Information

Collaborators must maintain confidentiality about data, products being implemented, customers, employees, other interested parties, projects, budgets, strategic planning, sales volume, financial data, marketing strategies, among others. Furthermore, it is forbidden to make available confidential information or data, which can only be released with authorization. Even though we have access to certain data, this is for use by the Travellex Confidence Group, and its disclosure or use for its own benefit or that of others is prohibited.

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Confidential information should not be kept in meeting rooms or on desks, especially during break hours and after hours. Also, confidential information should not be the subject of conversation in elevators, reception, cafes, restrooms, corridors, means of transport, social networks and others.

6.11 Commitment to the Environment

The Travelex Confidence Group is concerned with preserving the environment and, far beyond complying with administrative norms and regulations or voluntary socio-environmental responsibility policies, seeks to disseminate among its employees the need to change the organizational culture, bringing reflections on the impact and better results when properly implemented principles of socio-environmental preservation and sustainability. In addition, it contributes to a significant reduction in the risk of disasters and environmental scandals with image protection, to the improvement of processes focusing on rationalizing the use of natural resources and lowering production costs.

6.12 dress

In the exercise of their activities, employees must be dressed appropriately for the workplace, in accordance with a corporate environment and the identity of the Travelex Confidence Group. If in doubt, contact the Human Resources area.

6.13 Moral and Sexual Harassment

It is inadmissible to intimidate or attempt moral and/or sexual harassment of any person, through a declaratory act, images, text, insinuations and others.

6.14 Use of Goods and Assets

Assets and assets of the Travelex Confidence Group are all facilities, as well as products and services, systems, office supplies, equipment, telephone systems, processes and tools used to carry out activities. The personal use of these goods and assets shall be the responsibility of each employee and shall not infringe any Group policy.

6.15 Electronic Media

The use of electronic media (pen drive, DVD and others) for personal files and/or forwarding confidential information to third parties is prohibited, as well as the use of corporate e-mail, telephones, cell phones and other devices for improper use (hazing, rumors, pornography, offensive/aggressive messages).

6.16 Intellectual Property and Copyright

The transmission, reproduction or dissemination of copies without proper authorization or illegally obtained of any material produced or owned by the Travelex Confidence Group is prohibited.

6.17 Use of Password and Clear Table

Passwords are for individual use, non-transferable and must not be disclosed, and must be changed whenever requested (via internal communication) or whenever there is suspicion of violation or discovery. In addition, all physical or electronic documents, unlocked notebooks and cell phones, keys, confidential documents and others must be kept in a safe place

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6.18 External Relations

6.18.1 Government

No political activity should be related to the Travelex Confidence Group by its employees. The facilities and internal resources of the Travelex Confidence Group must not be used in support of political activities, also being prohibited the use of corporate funds for political contributions (except those permitted by law and approved by the Presidency) and other contributions aimed at political benefit.

It is strictly prohibited to offer or condition any contributions to public agents, under the terms of item 5.9 above. Such practices constitute forms of corruption, harm general interests, constitute criminal offenses and jeopardize the image and reputation of the Travelex Confidence Group.

In addition, it is prohibited (i) any donation, sponsorship, contribution or social action that violates current regulations and internal regulations and (ii) donations or contributions to finance election campaigns or political parties, under the terms of Direct Action of Unconstitutionality 4,650 , of 09/17/2015.

6.18.1.1 Employee Application for Public Office

Any employee who holds or intends to hold a public office, as described on the website of the Superior Electoral Court, must formally notify the Human Resources and Compliance area, where a possible unpaid leave of absence will be evaluated. Furthermore, electoral campaigns linked to the Travelex Confidence Group or on its premises are prohibited.

6.18.2 Press

Only the Presidency and Executive Committee of the Travelex Confidence Group may issue official opinions to third parties, including the press and other media channels, on Group information, such as financial data, opinions, comments or any other communication of an internal nature.

Likewise, external requests regarding official information from the Travelex Confidence Group must be forwarded to Marketing and the Compliance area, for risk assessment. If the matter is of a legal nature, it must also be passed on to the Legal Department, and no employee is authorized to provide clarifications without the aforementioned referral and due authorization.

Requests for new representatives for interviews and press relations (Spokespersons) must be evaluated and approved by the Executive Committee, and undergo communication training.

6.18.3 Clients

The Travelex Confidence Group's customers are its greatest asset and motivators for the excellence of the service provided, so we are careful and respectful in developing innovative, safe products and services that satisfy their needs. Thus, we provide clear and accurate information, even if they need to be negative at some point, because we are permanently careful with your interests. In addition, we maintain secrecy and confidentiality of information received and sent, avoiding interpersonal interests and opinions.

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6.18.4 Business Partners, Service Providers and other stakeholders

The Group must serve its business partners, service providers and other audiences with professionalism, courtesy, promptness and efficiency, providing, when applicable and as long as they are authorized, the information requested in an appropriate manner, even if its content is favorable or not to any of the parties, within the period expected by him. In addition, it should not act preferentially.

6.18.5 Regulators and Self-regulators

The Travelex Confidence Group operates in full collaboration and transparency with regulatory and self-regulatory bodies. In addition, it does not allow any form of granting advantages and/or privileges to public officials, even if it is for them to fulfill their obligations.

6.18.6 Media

The impact of any and all information disclosed in the media affects the business as a whole and is reflected in the public's perception of the Group. Thus, only persons appointed and authorized by Senior Management and Marketing should speak on behalf of the Travelex Confidence Group.

6.18.7 Competition

Fair competition is healthy and stimulating. It helps to pursue excellence in offering innovative products and services. However, it is forbidden to discuss matters related to strategies, products and services, such as pricing policies, costs, marketing, among other topics that are considered confidential.

7 SERVICE CHANNELS

7.18 Ethics Committee

Grupo Travelex Confidence is committed to ensuring ethical and sustainable conduct in the corporate environment, bringing together principles, values, guidelines and commitments that guide internal and external relations. The Ethics Committee, made up of employees of unblemished reputation, acts with transparency in the conduct of decisions that adhere to the Group's expectations regarding its business, employees, customers, business partners and others, seeking honest and efficient solutions.

7.19 Reporting Channel

Grupo Travelex Confidence requires the 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.

The Travelex Confidence Group will not tolerate retaliation against anyone who reports in good faith about an alleged violation of this Code, other applicable policies or laws and regulations. False denunciations 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.

For more information, consult GGIR-NOR03 – Standard for the Reporting Channel.

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7.20 Talk to the CEO

Talk to the CEO is a channel for employees to share ideas, compliments and suggestions for improvements directly with the President on topics that may be relevant to our business in Brazil, available at [Intranet](#).

8. MANAGEMENT PROCESS

Indications of irregularities in complying with the determinations of this Code will be audited and, if the actual irregularity is verified, the employee will be subject to the penalties applicable by the Travelex Confidence Group (verbal warning, written warning, suspension and dismissal for just cause).

9. ADHERENCE TO THE MATRIX CODE

The Travelex Bank Group in Brazil operates in perfect harmony with the provisions of the Code of Ethics of the parent company, located in the United Kingdom, which may be more restrictive or comprehensive, ensuring its commitment to the highest levels of governance, in addition to the applicable regulations and best market practices for proper mitigation of risks and implementation of safeguards to prevent and detect improper conduct and non-adherence to the principles of the Travelex Confidence Group.

10. RELATED DOCUMENTS

- GRH-NOR21 - A1 - Declaration of Impartiality

11. EXCEPTIONS TO THE CODE

All exceptions to the Code must be submitted to the analysis and approval of the Compliance 10rea and Board and, when necessary, of the Executive Committee.

12. AUTOMATIC RENOVATION

The renewal of this code will occur automatically each year or in accordance with process revisions, or adaptations to legal or regulatory compliance.

We declare that this is the updated version approved by the Executive Committee and Board of Directors on 02/07/2023