



# code of **ethics and conduct**

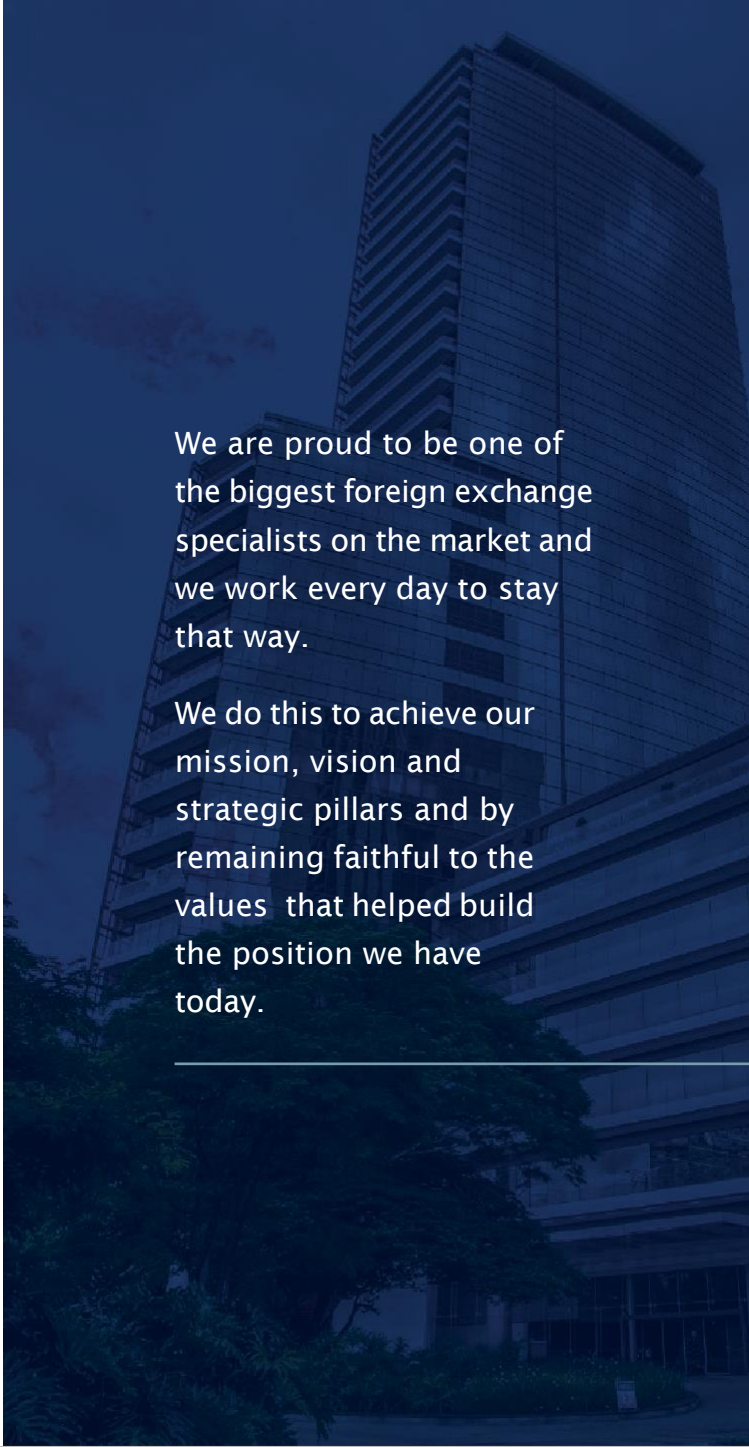
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# Identity corporate and our values

## Declaration of Values, Mission and Vision



We are proud to be one of the biggest foreign exchange specialists on the market and we work every day to stay that way.

We do this to achieve our mission, vision and strategic pillars and by remaining faithful to the values that helped build the position we have today.

**Our Vision:**

To be the most well-known, respected and trusted brand in international currency for our customers and partners.

**Our Mission:**

Simplify our customers' access to international money as and when they need it.

**Our values:**

- **Versatile**, we meet all our clients' needs.
  
- **In love**, we deliver our best every day.
  
- **Leaders**, we are experts and exchange rates are in our DNA.
  
- **Bold**, we always create new business opportunities.
  
- **Responsible**, we are reliable and ethical.

Providing a experience in all our relationships and activities is our great purpose and its realization only becomes possible through our organizational culture and conduct, guidelines and values set out in this Code, which must be followed and observed by all Group employees Travelex Confidence Group.

# TVX Principles

Our principles are complementary to our Mission, Vision and Values and serve as timeless guides for conducting our activities, business and relationships. It is through them that we guide our attitudes and conduct our business:

**1**  
**Ethics**  
We are ethical and value our reputational identity. We create, and maintain trustworthy relationships, respect our employees, business partners, service providers and the human person individuality, needs and expectations.

**2**  
**Good Faith**  
We always act with good faith in all our contractual relations, observing and respecting the legal, ethical and moral dictates.

**3**  
**Transparency**  
We are transparent and provide access to all the necessary information to our clients, service providers, business partners, investors, regulators, self-regulators, public authorities and counterparties, never omitting or concealing relevant and/or adjacent to the business.

**4**  
**Legality**  
Our actions, decisions and conduct are guided legally, and we never act in violation of the legal determinations and applicable regulations to the Group.

# Governance for Decision Making

The Travelex Confidence Group values the highest standards of Corporate Governance and it is in its DNA and structure to comply with the precepts, values and determinations set out in this Code for its decision making processes of the Institution.



Operational, tactical and strategic decisions must always be aligned with our values and principles, considering society, the common good and institutional interests, with ethics, transparency and legality in mind.

It is strictly prohibited, in any existing forum, instance, collegial body or individual authority, to make a decision that contradicts or fails to comply, in whole or in part, with legal and/or regulatory determinations applicable to the Travelex Confidence Group, being null and void as of its manifestation and binding, exclusively, the related natural persons, holding them responsible for the extent of their acts.

# No to Discrimination and Intolerances

We, at the Travelex Confidence Group, are experts in expanding horizons and challenging current scenarios. We value differences, singularities and all identities and ways of being, expressing and living. At the Travelex Confidence Group, any form of prejudice, discrimination, coercion or violation of Individual Human Rights and Guarantees is unacceptable.

We do not tolerate any act of racism, LGBT-phobic, machismo, religious intolerance, ableism, xenophobia or other manifestations of discrimination, oppression or coercion of the free expression of identity.

Committed to the premises of respect, aligned with legal obligations and responsibilities, the Institution seeks to adopt policies and programs that promote Diversity and Inclusion, as promulgated by the American Convention on Human Rights (Pact of Saint Joseph of Costa Rica).

We move away from guidelines that relativize unhealthy working conditions, encouraging slavery-like, child and/or forced work and seek, in an effective and concrete way, to remunerate, promote and guarantee individual and collective rights.

We value diversity with our clients, employees, correspondents and third parties to the Group, as because of this, different ideas and minds will be seen, enhancing the Institution's creative and organizational processes.

If you identify attitudes that are contrary to what is described in this code, activate our "Report Channel" so that such acts are prevented and, if formally verified, they will be subject to Consequence Management as provided for in the Group's internal Policies.



# Relations

## Interpersonal

Interpersonal relationships within the Travelex Group are guided and must be conducted with maximum cordiality, mutual respect and professionalism. We believe and value that all individuals are respected and treated with dignity.



Any act of offense, verbal aggression, moral or psychological harassment is expressly prohibited and will be sanctioned as provided for in the Internal Policies. Any type of aggression or physical harassment, invasion or disrespect for the intimacy, sexuality and integrity of others is strictly prohibited, which will be treated as harassment and will have the appropriate administrative and judicial measures whenever applicable, also communicated, when found, to the competent police authorities.

The private life of each employee, service provider, business partner, customers and counterparties of the Group must be respected, and the moral order and good treatment is non- negotiable in our relationships.

We collaborate with everyone's work and understand that we are part of a single Group, driven by the same purpose.



# Clothing

In line with our values and respect for the individuality of each member of the Organization, the Travelex Confidence Group respects the way each personality manifests itself and, in this sense, it is free for each employee to adopt clothing, as long as corporate standards and use of uniforms for the positions and positions thus defined.

In this sense, the use of pieces that make analogies or support for sports teams, political parties or neo- Nazi, racist, LGBT-phobic ideologies or that represent any type of violation of Human Rights will not be permitted.



# Relationships with Suppliers, Service Providers and Business Partners

Our relationships with Third Parties, defined as suppliers, service providers and business partners, are based on legality, the exchange of experiences, values and deliveries to the Group, counterparties, customers and society.

We believe that together we are powerful and guarantee processes that enable these partnerships in a healthy, permanent and mature way. To this end, any exchange, promise, granting of advantages and/or unreasonable benefits.

All Third Parties must have their registration data duly collected and filed at the institution's headquarters, in addition to going through a Due Diligence process that guarantees legal and regulatory compliance.

We will not have relationships, nor will we maintain ties with natural or legal entities that have in their history discreditable facts related to work similar to slavery, child labor, money laundering, terrorist financing, crimes against the Financial System, corruption or any act against direct or indirect public administration, under the terms of Law 12,846/13.



# Confidentiality of information

Employees must maintain confidentiality regarding data, products being implemented, customers, employees, other interested parties, projects, budgets, strategic planning, sales volume, financial data, marketing strategies, among others.



Furthermore, the availability of information or data received on a confidential basis is prohibited, which can only be released upon authorization.

Even if you have access to certain data, these are for the use of the Travelex Confidence Group, and their disclosure or use for their own benefit or that of others is prohibited. Confidential information should not be kept in meeting rooms or on work desks, especially during break times and after work hours. Furthermore, confidential information should not be the subject of conversation in elevators, reception, cafes, bathrooms, corridors, means of transport, social networks and others.

# Physical Assets and Property Intellectual

The assets and assets of the Travelex Confidence Group comprise all facilities, as well as products and services, systems, office supplies, electronic equipment of any nature, processes and tools used to carry out activities.

The personal use of these goods and assets must be intended exclusively for the performance of the position, functions and institutional responsibilities, being under the strict responsibility of each employee.

In the same sense, all information, data and intellectual products are the exclusive property of the Group, and their collection, disclosure, circulation or sharing is strictly prohibited.

Deviations in the use of physical or intellectual assets will be subject to administrative and/or judicial sanctions, when applicable, as provided for in the Consequence Management Policy.



# Conflict of interest

It is unacceptable in any form of relationship that binds the Travelex Confidence Group to the granting of unreasonable benefits or advantages, meaning concessions, contractual provisions, economic privileges or any other nature between the counterparties in disagreement with what is commonly applied to other similar or customary profiles. on the market.

In the same sense, any conflict of interest is prohibited, meaning the interference of various personal motivations (professional, financial, family, political or personal) in the judgment and exercise of institutional actions, among them:

- I. Prioritize a private or private interest, to the detriment of the institution's interests or exposure to legal, regulatory and/or reputational risks;**
- II. Acting excited for various reasons, of any nature (not necessarily**

- economic), related to oneself or third parties with whom one has a bond of affinity, kinship or close friendship;**
- III. Consolidate professional relationships on a regular basis, with prior private interest, distorting them later;**
- IV. Be aware of the fact that there is a potential reputational, economic and/or financial risk for the Institution and refrain from omitting this relevant and harmful fact.**

The process for monitoring and managing conflicts of interest is set out in internal Corporate Policy and must be observed in addition to this Code. Situations identified that do not comply with the precepts established above will be subject to Consequence Management.

# Activities External

The Travelex Confidence Group values free initiative and does not impose any impediment to the performance of external work activities by its employees, if they are not related to the Business currently being carried out and do not conflict with the individualized contractual working hours and other terms set out in the Employment Contract.

In this sense, employees of the Travelex Confidence Group are not permitted to:

- Perform temporary or permanent activity, of any nature, for another Financial Institution or member of the National Financial System;
- Provide private services to clients of the Travelex Confidence Group;
- Use information, technologies and other resources made available by the Travelex Confidence Group for the performance of external activities.
- Use the Group's brand for self-promotion, whether commercial, academic or of any other nature.

## Relatives and Family members

Hierarchical relationships, direct or indirect, between employees who are relatives/family members, blood or similar, up to the second degree, are prohibited.

Contractual relationships with family ties between employees may exist, as long as the previous provisions are observed and that cumulatively, there is no conflict of interest in compliance with the Corporate Policy for Monitoring and Management of Conflict of Interest.



# Acts Against Public Administration

The Travelex Confidence Group places great importance on complying with and observing the provisions set out in Law 12,846/13 (Anti-Corruption Law). In this sense, it is strictly vetoed and will be administratively sanctioned, in addition to being communicated to the police authorities competent authorities, any act provided for and typified in art. 5th of the aforementioned letter.

In this sense, it is strictly prohibited by any natural or legal person acting on behalf or in the interest of the Travelex Confidence Group:

- I. Promising, offering or giving, directly or indirectly, an undue advantage to a public agent, or a third person related to him or her;**
- II. Finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for by Law;**

**III. 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. 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.**

Without prejudice, changes or legislative innovations that may arise after the publication of this Code, will be tacitly incorporated into this Chapter, to which the provisions on harmful acts against public administration in relation to bidding and contracts also apply.



# Gifts, Giveaways and Hospitality

The offering, granting or delivery of gifts to public agents is strictly prohibited, including goods, services or benefits of any kind that do not constitute gifts or hospitality.

Grants of gifts and/or hospitality will be permitted, as long as the limits set out in the Conflict-of-Interest Law - LCI (Law No. 12,813/2013) and Decree No. 10,889/2021 are observed, which defines:

**Freebies:** Items of low economic value, distributed in a widespread manner, as a courtesy, advertising or regular publicity. Low economic value is understood as being less than one percent of the remuneration ceiling provided for in item XI of the caput of art. 37 of the Federal Constitution.

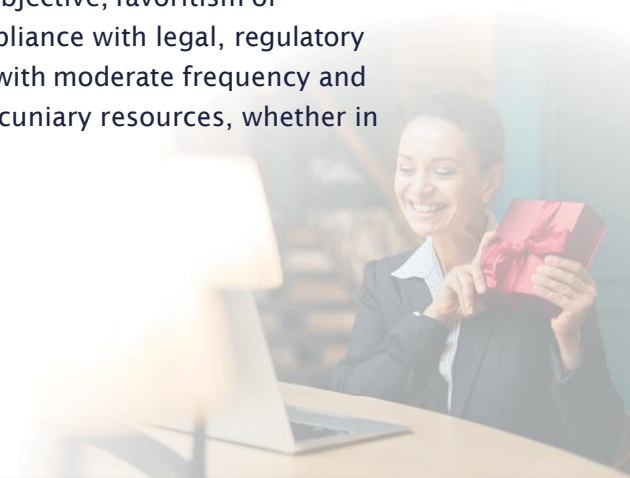
**Hospitalities:** Offer of service or expenses with transportation, food, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted

by a private agent to a public agent in the institutional interest of the body or entity in which it operates;

Before offering any gift or hospitality, you must assess whether local rules are being respected, as well as legislation that deals with transnational bribery (e.g.: FCPA, UK Bribery Act) and, also, whether the company's internal policies and rules recipient's institution are being observed.

In case of receipt by a Group Employee, regardless of the nature, it is mandatory to refuse or if it is impossible, it must be immediately communicated to the Compliance area, under penalty of administrative measures.

Finally, any and all offerings or receipts must occur publicly, without any linked objective, favoritism or privileged treatment, in compliance with legal, regulatory and best practice provisions, with moderate frequency and no granting or transfer of pecuniary resources, whether in kind or in any other way.



# Prevention of Money Laundering and Terrorism Financing

We understand our relevance in the global market and as the first Foreign Exchange Bank in Brazil and the largest Foreign Exchange group in the world, we have an unwavering commitment to national and international procedures and policies for Combating Money Laundering and Terrorist Financing, especially the Law 9,613/89, Circular nº 3,978/2020 and Circular Letter nº 4,001/2020, both issued by the Central Bank of Brazil.

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We make every effort to mitigate the use of the financial system and our structures in such criminal practices and will prevent any suspected or identified act, with due notifications to the competent authorities and appropriate internal actions.

In the same sense, it is strictly prohibited to grant exceptions, flexibility, concealment or alteration of registration, operational or transaction information that does not comply with the current Internal Rules and Policies, so that any occurrences will be treated with maximum rigor and backed by the sanctions provided for. in the Consequence Management Policy, without prejudice to police communications and legal actions that are appropriate and necessary.

# Fraud

We continually work to improve our technologies, controls and methodologies aimed at preventing internal and/or external fraud, whether regarding the signing of contracts, accounting records, rendering of accounts and/or information to civil society, counterparties or public agents.

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The manipulation, alteration, concealment or simulation of any data, information or fact regarding the governance, processes and business of the Travelex Confidence Group, by anyone, regardless of mood or intention, is strictly prohibited.

Deviations of this nature are unacceptable and will be subject to appropriate administrative measures, not ruling out possible legal actions and communications to the competent police, regulatory and supervisory authorities, as provided for in the Travelex Confidence Group Consequences Policy.



# Reporting Channel and management of Consequences

The Travelex Confidence Group has robust, impartial and dedicated Governance to address and deliberate on issues related to Ethics, Integrity and Conduct.



Any situation that does not comply with the precepts defined in this Code or that deviates from ethical standards and our institutional values must be reported on the Reporting Channel, on the Institution's website and will be subject to the application of the Management Policy of Consequences.

This channel has complete autonomy, impartiality and confidentiality regarding the records made and the identity of the users, with each report being investigated in accordance with internal standards and taken to the Integrity and Ethical Conduct Committee for deliberation.



**Confidence**  
*Câmbio*