



Contingency and Liquidity Mitigation Policy

Responsible Area: Legal & Compliance

Director in Charge: Ricardo Reis

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Signature of Responsible Director:

Ricardo Reis

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	1.0	First publish	Legal & Compliance

This document is valid for a limited period and may be updated at any time at the sole discretion of FacilitaPay.

1. GOAL

This Policy aims to establish robust guidelines for the liquidity management of Facilitapay, which operates exclusively in the postpaid modality, not granting credit to customers. The objective is to ensure that Facilitapay maintains adequate levels of liquidity to meet all its financial obligations, even in stressful situations, ensuring the continuity of operations and the confidence of customers and stakeholders.

2. SCOPE

This Policy is applicable to all Facilitapay Employees who manage Facilitapay's Liquidity Risks and/or manage Facilitapay Accounts.

3. DEFINITION

Liquidity risk is the possibility of the Payment Institution not being able to efficiently honor its current and future obligations, both expected and unexpected, impairing its daily operations and incurring significant losses, in addition to not being able to convert electronic money into physical or book-entry currency at the time of the user's request.

4. LIQUIDITY RISK MANAGEMENT FRAMEWORK

In order to control and mitigate liquidity risk, processes were defined and developed in order to monitor activities, dealing with occurrences, mitigating liquidity risk and suggesting improvements.

To identify these risks, information on the daily movement of investments and control are evaluated by signaling changes that may connote the insufficiency of financial resources to honor the obligations, such as identification of all cash inflows and outflows, categorized by term, evaluation of different stress scenarios, including market crises, loss of large customers and operational failures and continuous monitoring of key indicators such as quick ratio, liquidity coverage and liquidity gap.

5. CONTINGENCY PLAN FOR LIQUIDITY RISK

The contingency plan consists of a set of measures that should be activated in times of liquidity crisis to meet Facilitapay's needs. In situations of specific liquidity stress or systemic

liquidity crisis that result in a significant reduction in reserve levels, the contingency plan must be activated upon approval by the Executive Board, formalized by e-mail, and will include:

- Partners' capital: through contributions; and
- Financing acquired in Banks (Public and/or Private): in the form of credit lines.

6. DUTIES AND RESPONSIBILITIES

FacilitaPay adopts the liquidity risk management structure and processes compatible with the nature of its activities and the complexity of the products and services.

The liquidity risk management structure is composed of the Board of Directors, the Risk Management Committee and the Liquidity Manager, who perform the following functions:

- Board of Directors: Responsible for approving the liquidity policy and general supervision;
- Risk Management Committee: Oversees the implementation of the policy and periodically reviews the liquidity strategy;
- Liquidity Manager: Responsible for the execution of liquidity policies and strategies on a day-to-day basis.

7. Conclusion

FacilitaPay is committed to the continuous improvement of its risk management structure. Feedback, learning from events and changes in the environment will be used to evolve and improve policies, internal controls and processes associated with liquidity risk management

Because FacilitaPay may face unique risks compared to traditional financial institutions, the institution is committed to staying up to date on industry best practices and regulatory developments pertinent to its business model. This documentation has a minimum annual review or whenever necessary.