



Manual for the Identification, Qualification and Classification of Employees, Partners and Third-Party Service Providers

Responsible Area: Legal & Compliance

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1. OBJECTIVE

This Manual aims to establish the procedures intended to identify, qualify, and classify Employees, Partners, and Third-Party Service Providers of FacilitaPay.

The procedures set forth herein must be followed both when initiating new relationships with Employees, Partners, and/or Third-Party Service Providers, as well as when maintaining existing relationships, with the purpose of updating the information and documents already collected by FacilitaPay.

This Manual has been prepared in accordance with FacilitaPay's AML Policy, and in compliance with the applicable legislation and regulations, notably Circular No. 3,978/20.

2. DEFINITIONS

All capitalized terms in this Manual shall have the meanings listed below:

AML/CFT means Anti-Money Laundering and Countering the Financing of Terrorism;

AML/CFT Policy means the current version of FacilitaPay's Policy for the Prevention of Money Laundering and Terrorism Financing Crimes;

Anti-Terrorism Law means Law No. 13,260 of March 16, 2016;

BCB means the Central Bank of Brazil;

Beneficial Owners means (i) individuals who directly or indirectly hold 25% (twenty-five percent) or more of the equity interest in the Partner or Third-Party Service Provider; or (ii) individuals who, in fact, exercise direct or indirect control over the activities of the Partner or Third-Party Service Provider on whose behalf a transaction is being conducted or who benefit from it, including their respective attorneys-in-fact or representatives;

Circular nº 3.978/20 means Circular No. 3,978, dated January 23, 2020, issued by the BCB, as amended, which sets forth the policy, procedures, and internal controls to be adopted by institutions authorized to operate by the BCB, aiming to prevent the use of the national financial system for money laundering and terrorist financing;

Close Associate means (i) an individual known to have any kind of close relationship with a PEP, including: (a) joint ownership in a private legal entity; (b) acting as proxy, even under a private power of attorney, for the person mentioned in item (a); or (c) joint participation in non-legal arrangements; and (ii) an individual who controls legal entities or non-legal arrangements known to have been created for the benefit of a PEP;

CNPJ/MF means the National Registry of Legal Entities of the Ministry of Finance;

CPF/MF means the Individual Taxpayer Registry of the Ministry of Finance;

COAF means the Financial Activities Control Council, a body created by the Ministry of the Economy to regulate, apply administrative penalties, receive, examine, and identify suspected occurrences of illicit activities as set forth in Law No. 9,613/98, without prejudice to the jurisdiction of other bodies and entities;

Employee(s) means any individual or legal entity who holds or is in the process of assuming a position, role, corporate relationship, employment, professional, contractual, or fiduciary relationship with FacilitaPay, including but not limited to individuals hired under the Consolidation of Labor Laws (CLT). **UNSC** means the United Nations Security Council;

FacilitaPay means Facilita Instituição de Pagamento S.A, FacilitaPay US LLC, FPay Internacional SA de CV., FPay Colombia SAS, o FacilitaPay Chile SPA, together or separately;

Family Members means relatives of the PEP in a direct or collateral line up to the second degree, the spouse, partner, stepson and stepdaughter;

HR means FacilitaPay's Human Resources team;

Money Laundering Law means Law No. 9,613 of March 3, 1998;

Manual means this Manual for the Identification, Qualification, and Classification of Employees, Partners, and Third-Party Service Providers;

OFAC means the Office of Foreign Assets Control, an agency of the United States Department of the Treasury responsible for maintaining the Specially Designated Nationals (SDN List), which includes countries and individuals embargoed or restricted from conducting transactions involving certain products, with certain countries and individuals accused of, among other things, drug trafficking, terrorism, and the production, use, or proliferation of weapons of mass destruction;

Partner means any individual or legal entity that maintains or seeks to establish a commercial partnership with FacilitaPay for mutual interest in the development of a product or service, or who acts or may potentially act as a supplier to FacilitaPay;

PEPs or Politically Exposed Persons means: (with respect to the individual or their first- and second-degree relatives):(i) holders of elective office in the Executive and Legislative branches of the Federal Government;(ii) individuals holding positions in the Federal Executive branch, such as: (a) Minister of State or equivalent; (b) positions of a Special Nature or equivalent; (c) president, vice-president, director, or equivalents, of entities within the indirect public administration; (d) members of the Senior Management and Advisory Group (DAS), level 6, or equivalent; (iii) members of the National Council of Justice, the Federal Supreme Court, the Superior Courts, Federal Regional Courts, Regional Labor Courts, Regional Electoral Courts, the Superior Labor Court Council, and the Federal Justice Council; (iv) members of the National Council of the Public Prosecutor's Office, the Prosecutor General of the Republic, the Deputy Prosecutor General of the Republic, the Prosecutor General for Labor, the Prosecutor General for Military Justice, the Deputy Prosecutors General of the Republic, and the State and Federal District Prosecutors General; (v) members of the Federal Court of Accounts (TCU), the Prosecutor General and Deputy Prosecutors General of the Public Prosecutor's Office at the TCU;

(vi) national presidents and treasurers, or equivalents, of political parties; (vii) State Governors and Secretaries, Federal District Secretaries, State and District Representatives, presidents or equivalents of entities of indirect state and district public administration, and presidents of Courts of Justice, Military Courts, Audit Courts or equivalents in the States and Federal District; (viii) Mayors, Councilors, Municipal Secretaries, presidents or equivalents of municipal indirect public administration entities, and Presidents of Audit Courts or municipal equivalents; (ix) persons who, abroad, are: (a) heads of state or government; (b) senior politicians; (c) senior government officials; (d) senior judicial officials and generals; (e) senior executives of state-owned enterprises; or (f) leaders of political parties; and (x) senior leaders of public or private international law entities.

RFB means the Brazilian Federal Revenue Service (Receita Federal do Brasil); and

Third-Party Service Providers means any and all individuals or legal entities contracted by FacilitaPay or seeking a contractual relationship with FacilitaPay to provide outsourced services in accordance with applicable legislation;

3. SCOPE

This Manual applies to all Employees and Staff, Partners and/or Third-Party Service Providers of FacilitaPay, as applicable, and must be executed by the following departments, as the case may be: (i) Compliance; (ii) Human Resources (HR); (iii) Commercial; and (iv) Legal.

4. RULES

4.1. PROCEDURES FOR HIRING EMPLOYEES

4.1.1. Hiring a New Employee

The employee hiring process must be carried out through the Solides and Docusign platforms, which have been contracted by FacilitaPay specifically for the storage of employee documentation, in order to facilitate compliance by the Compliance and HR departments with the AML Policy and this Manual.

If a FacilitaPay employee responsible for hiring a new staff member and/or carrying out the procedures described in this Manual is unable to access their Solides or Docusign account, they must immediately contact FacilitaPay's HR team.

FacilitaPay will not be able to formalize the hiring of an employee until the identification, qualification, and classification procedures for employees have been completed, as described below.

An employee may enter the hiring process with FacilitaPay in two (2) ways: (i) by applying for an open position posted by FacilitaPay on its website, LinkedIn, or partner websites; or (ii)

through the use of internal or third-party headhunters hired specifically to find potential new employees in accordance with FacilitaPay's internal needs.

After the applicable interviews are conducted, along with any other hiring stages imposed by FacilitaPay, if HR is interested in hiring a potential candidate, the identification, qualification, and classification procedures must be initiated.

4.1.1.1. Employee Identification Procedure

The employee identification procedure at FacilitaPay consists of collecting, at a minimum, the following information:

- a) Photo of the Identity Card (RG) or National Driver's License (CNH), for Brazilian employees; or
- b) Photo of the National Foreigner Registry (RNE), National Driver's License (CNH), or Passport issued by the applicable foreign authority, for foreign employees;
- c) CPF (Individual Taxpayer Registry) number;
- d) Full name;
- e) Date of birth;
- f) Marital status;
- g) Nationality;
- h) Residential address;
- i) Job position;
- j) Annual income (self-declared);
- k) Statement regarding Politically Exposed Person (PEP) status;
- l) Email address;
- m) Presentation of technical certifications, academic degree and/or postgraduate diplomas, among others, when required to perform the role, at FacilitaPay's discretion;
- n) Full name of father and mother;
- o) Family annual income (self-declared);
- p) Emergency contact; and
- q) Statement of previous professional experience, including company name, position held, and start and end dates of employment.

All the aforementioned information must be submitted by the employee to FacilitaPay through the Solides platform, which will be forwarded directly to the FacilitaPay HR team.

Upon receipt of the prospective employee's information, FacilitaPay's HR must proceed with the employee qualification and classification procedures, as described below.

4.1.1.2. Employee Qualification Procedure

Once the above-mentioned information and documents have been received by FacilitaPay, the employee qualification procedure must be initiated. To that end, the following internal processes for validating and verifying information and documentation must be carried out:

- a) Verification of relevant information in the Brazilian Federal Revenue (RFB) database by means of a qualification certificate submitted by the employee via Solides or email, with the purpose of confirming whether the name provided by the employee matches the data found in the aforementioned sources and whether the CPF/ME exists and is valid in the RFB database;
- b) Verification of relevant information in international sanctions lists, including those issued by OFAC, the UN, among others, as listed in Annex II of this Manual;
- c) Verification of relevant information in the RFB, Shufti-Pro, and Serasa databases to determine whether the employee qualifies as a Politically Exposed Person (PEP), as defined by the Central Bank of Brazil (BCB);
- d) Search for adverse media online or in other public and/or private databases, as well as investigation of the employee's previous work experience via online sources;
- e) Verification of state and federal criminal background certificates, which must be issued by the employee and submitted via email or Solides to the HR representative responsible for the hiring process.

The qualification procedures outlined above should be validated using FacilitaPay's internal systems and carried out in an automated manner, unless such systems are not sufficiently capable of performing the procedures, in which case a manual review must be conducted.

Additional manual qualification procedures may be performed by FacilitaPay depending on the risk assessment of the employee and their role. These may include, but are not limited to, geographic verification of the employee's residential address, independent online research into their profession, requests for documentation to support declared income, among others, at the discretion of FacilitaPay's Compliance department, as described below:

Risk Evaluation	Additional Qualification Procedures
Low Risk	N/A
Medium Risk	<ul style="list-style-type: none"> • Verification of the declared residential address through: (i) the request for a utility bill, such as an electricity or water bill (telephone bills will not be accepted); and (ii) verification of the address using Google Maps and Google Earth; and

	<ul style="list-style-type: none"> Other measures, at the discretion of FacilitaPay's Compliance department.
High Risk	<ul style="list-style-type: none"> Verification of the declared residential address through: (i) requesting a proof of residence, such as an electricity or water bill (telephone bills will not be accepted); and (ii) verifying the address using Google Maps and Google Earth; Verification of the employee's declared financial capacity by requesting a simplified personal income tax return (IRPF); In-person or virtual interview with FacilitaPay's Compliance team; and Other measures, at the discretion of FacilitaPay's Compliance department.

4.1.1.3. Employee Classification Procedure

After the completion of the employee identification and qualification procedures, and if HR deems the candidate eligible for hiring, the Compliance team must classify the employee's Anti-Money Laundering (AML) risk based on the following criteria, listed in decreasing order of importance:

- a) Any personal aspect of the employee that may influence the commission of money laundering, terrorism financing, or the proliferation of weapons of mass destruction, with an appropriate level of ongoing monitoring to be applied according to the employee's risk level;
- b) The employee's previous professional experience, as well as the presence of adverse media, criminal records, and/or financial impacts;
- c) Media content relevant to AML risk;
- d) PEP - Politically Exposed Person status;
- e) Geographic factors, such as border cities or locations in high-risk countries;
- f) Number of alerts generated during monitoring;
- g) Dual citizenship / Foreign national;
- h) Time elapsed since the last profile review; and
- i) Reports previously submitted to COAF (Brazil's Financial Intelligence Unit).

The risk classification of FacilitaPay employees must be carried out by the HR team and, if any alert is identified during monitoring, it must be forwarded to the Compliance department and included in the employee's profile file stored in the restricted-access HR drive.

Any identified alert will classify the employee as "medium risk," triggering a mandatory review of the employee's registration and information by the Compliance team.

If a higher risk is identified, the Compliance and HR departments must jointly deliberate and formally approve the potential hiring of the employee by FacilitaPay.

4.1.1.4. Formalization of Employee Hiring

To hire a new employee, FacilitaPay's HR department must have previously obtained express approval from: (i) the department requesting the new hire; and (ii) Compliance, through a formal analysis of the candidate's qualification, when applicable.

Prior to receiving the above-mentioned approvals, HR must have already sent a job offer letter to the candidate, outlining the terms and conditions of the position, including start date, salary, details of benefits, potential bonuses, and other relevant information at HR's discretion.

Upon receiving the candidate's agreement to the offer letter via email, FacilitaPay's HR department must:

- a) Instruct the candidate to undergo a pre-employment medical examination at a specialized medical clinic partnered with FacilitaPay, with the results to be sent directly to FacilitaPay by the clinic;
- b) Request the employee's signature on an employment contract duly prepared in accordance with the Brazilian Labor Code (CLT);
- c) Register the employee with e-Social, in accordance with current legislation (through outsourced accounting services); and
- d) Record the new employment relationship in the employee's digital Work and Social Security Card (Carteira de Trabalho e Previdência Social – CTPS), also through outsourced accounting services.

Finally, between the employee's start date and no later than the end of their first month at FacilitaPay, the company must: (i) provide the employee with its internal policies and manuals, as applicable; and (ii) conduct training sessions, especially related to AML/CFT (Anti-Money Laundering/Combating the Financing of Terrorism).

4.2. EMPLOYEE RECORD UPDATE

The internal process for updating employee records must be carried out via email and designated forms, which have been adopted by FacilitaPay specifically to ensure compliance by its employees with the AML Policy and this Manual.

At least once every 24 (twenty-four) months, all employees employed by FacilitaPay must have their records updated through a form made available by the HR department. Upon receiving a request for update from HR, the employee must: (i) confirm that the previously submitted information and documents remain valid; and/or (ii) provide the relevant updated information to refresh their records with FacilitaPay; and (iii) undergo a new medical examination at a

specialized clinic partnered with FacilitaPay, with the results to be sent directly to FacilitaPay by the clinic.

Based on the updated information, if any changes involve one or more of the risk factors previously mentioned, HR will forward the relevant data to Compliance, which must then carry out a new employee qualification procedure in order to update the employee's risk classification.

4.3. PARTNERS AND THIRD-PARTY SERVICE PROVIDERS

4.3.1. Hiring of Partners and Individual Third-Party Service Providers

The registration process for individual Partners and/or Third-Party Service Providers must be carried out using the Notion and/or OneDrive platforms, which have been adopted by FacilitaPay specifically to support employee compliance with the AML Policy and this Manual.

If a FacilitaPay employee responsible for registering a new Partner and/or Third-Party Service Provider and/or performing the procedures described in this Manual is unable to access their account on the aforementioned platforms, they must immediately contact FacilitaPay's Compliance team.

FacilitaPay may not initiate a relationship with any new Partner and/or Third-Party Service Provider until the identification, qualification, and classification procedures described below have been completed.

4.3.1.1. Individual Identification Procedure

The identification procedure for FacilitaPay's Partners and/or Third-Party Service Providers consists of collecting, at a minimum, the following information in order to initiate a new relationship with the Partner and/or Service Provider, when acting as individuals:

- a) Photo of the Identity Card (RG) or National Driver's License (CNH), for Brazilian Partners or Third-Party Service Providers; or
- b) Photo of the National Foreigner Registry (RNE), National Driver's License (CNH), or Passport issued by the applicable foreign authority, for foreign Partners or Third-Party Service Providers;
- c) CPF (Individual Taxpayer Registry) number;
- d) Full name;
- e) Date of birth;
- f) Nationality;
- g) Landline phone number, including area code (DDD);
- h) Residential address;
- i) Occupation;
- j) Annual income (self-declared);
- k) Nature of the relationship between the Partner or Third-Party Service Provider and FacilitaPay;

- l) Declaration regarding Politically Exposed Person (PEP) status;
- m) Presentation of technical certifications or licenses required to establish the partnership or provide the applicable service, at FacilitaPay's discretion; and
- n) E-mail address.

All the aforementioned information must be submitted or updated, as applicable, by the Partner or Third-Party Service Provider to FacilitaPay via email directed exclusively to the Legal/Compliance team.

The teams responsible for negotiations with the Partner or Third-Party Service Provider, including contractual negotiations, must forward all relevant information received — as applicable — to the Legal/Compliance team for the execution of the qualification and classification procedures described below.

4.3.1.2. Individual Qualification Procedure

Once the above-mentioned information and documents have been received by FacilitaPay's Compliance team, the qualification procedure for Partners or Third-Party Service Providers must be initiated. To that end, the following internal processes for validating and verifying the information and documentation must be carried out when the Partner or Service Provider is an individual:

- a) Verification of relevant information in the Brazilian Federal Revenue (RFB) database, ShuftiPro, and other contracted software, to confirm whether the name provided by the Partner or Third-Party Service Provider matches the results found in the mentioned sources, and whether the CPF/ME exists and is valid in the RFB database;
- b) Verification of information in international sanctions lists, including those issued by OFAC, the UN, and others, as listed in Annex II of this Manual;
- c) Verification of information using ShuftiPro and other contracted software to determine whether the Partner or Third-Party Service Provider qualifies as a Politically Exposed Person (PEP), as defined by the Central Bank of Brazil (BCB); and
- d) Search for adverse media online or in other public and/or private databases (including the issuance of criminal background certificates), and investigation of online evidence regarding previous work experience.

The qualification procedures described above must be validated through the use of FacilitaPay's internal systems and carried out in an automated manner, except in cases where the internal systems are not sufficiently capable of performing the procedures, in which case a manual review must be conducted.

Additional manual qualification procedures may be carried out by FacilitaPay depending on the risk assessment of the Partner or Third-Party Service Provider and the nature of their activities. These may include, but are not limited to: geographic verification of the individual's

residential address, independent online research into their profession, requests for documents to support declared income, among others, at the discretion of FacilitaPay’s Compliance department, as outlined below:

Risk evaluation	Additional Qualification Procedures
Low Risk	N/A
Medium Risk	<ul style="list-style-type: none"> • Verification of the reported residential address by: (i) requesting a proof of residence such as an electricity or water bill (telephone bills will not be accepted); and (ii) verifying the address on Google Maps and Google Earth; • Other procedures at the discretion of FacilitaPay’s Compliance department.
High Risk	<ul style="list-style-type: none"> • Verification of the reported residential address by: (i) requesting proof of residence such as an electricity or water bill (telephone bills will not be accepted); and (ii) verifying the address on Google Maps and Google Earth; • Verification of the declared financial capacity of the Partner or Third-Party Service Provider by requesting a simplified copy of their individual income tax return (IRPF); • In-person or virtual interview of the Partner or Third-Party Service Provider with FacilitaPay’s Compliance team; and • Other procedures at the discretion of FacilitaPay’s Compliance department.

4.3.1.3. Individual Classification Procedure

After completing the identification and qualification procedures for Partners or Third-Party Service Providers, if Compliance considers the potential engagement of the Partner or Service Provider feasible, Compliance must classify the AML risks of the potential Partner or Third-Party Service Provider based on the following criteria:

- a) FacilitaPay’s capability to combat money laundering, terrorism financing, and proliferation of weapons of mass destruction crimes, with the appropriate level of ongoing monitoring applied based on the risk of the Partner or Third-Party Service Provider;
- b) The level of money laundering, terrorism financing, and/or proliferation of weapons of mass destruction risk that the Partner or Third-Party Service Provider presents to FacilitaPay;

- c) The nature of the Partner or Third-Party Service Provider, such as governmental entities, unregulated funds, trusts, foundations, among others;
- d) The nature of the commercial activity, including the assessment of activities more susceptible to illegal exploitation (casinos, betting houses and other gambling-related activities, religious and charitable entities, gas stations, among others), and the creation of a list of "Prohibited Activities";
- e) Reputational risk to FacilitaPay;
- f) Risk associated with the partnership or service to be provided;
- g) Financial impacts;
- h) Impacts related to Environmental, Social, and Governance (ESG) factors;
- i) Relevant AML-related media;
- j) PEP - Politically Exposed Person;
- k) Contracts signed by proxy;
- l) Geographic factors, such as border cities or countries considered high risk;
- m) Number of alerts in monitoring;
- n) Dual citizenship / Foreigner;
- o) Time since the last registration update;
- p) Communications made to COAF; and
- q) Incomplete registration information

The risk classification of FacilitaPay's Partners or Third-Party Service Providers must be conducted by the Compliance team and included in the Partner's or Third-Party Service Provider's registration file available in the Notion and OneDrive platforms.

After completing the qualification and classification procedures described above, Compliance must forward its formal approval regarding the potential engagement of the Partner or Third-Party Service Provider by FacilitaPay to the Commercial, New Business, and Legal teams.

4.1.3.4. Formalization of the Hiring of Partners or Third-Party Service Providers

To hire a new Partner or Third-Party Service Provider, FacilitaPay's Commercial and New Business teams must have received express approval from FacilitaPay's Legal team regarding the feasibility of the intended partnership or the possibility of entering into the commercial contract from a legal standpoint.

FacilitaPay's Compliance and Legal teams must always assess the need to require the Partner or Third-Party Service Provider to adhere to FacilitaPay's AML/CTF Policy and related documents, without prejudice to other internal FacilitaPay documents (e.g., NDA, Cybersecurity Policy, etc.).

Finally, between the start date of the relationship with the Partner or Third-Party Service Provider and, at the latest, the completion of their first month as a Partner or Third-Party Service Provider, FacilitaPay must, if applicable and according to the instructions of its Legal and Compliance teams: (i) provide the Partner or Third-Party Service Provider with its internal policies and manuals, as applicable; and (ii) conduct trainings, especially related to AML/CTF.

4.3.2. Hiring of Partners and Third-Party Service Providers – Legal Entities

The registration process for Partners and/or Third-Party Service Providers that are legal entities must be carried out through the Notion and OneDrive platforms, which have been contracted by FacilitaPay specifically to facilitate its employees' compliance with the AML Policy and this Manual.

If a FacilitaPay employee responsible for registering a new Partner and/or Third-Party Service Provider and/or executing the procedures described in this Manual is unable to access their account on the aforementioned platforms, they must immediately contact FacilitaPay's Compliance team.

FacilitaPay may not initiate a relationship with a new Partner and/or Third-Party Service Provider until the identification, qualification, and classification procedures described below have been completed.

4.3.2.1. Legal Entity Identification Procedure

The identification procedure for Partners and/or Third-Party Service Providers at FacilitaPay consists of collecting, at a minimum, the following information to initiate a new relationship with the Partner and/or Third-Party Service Provider when they are legal entities:

- a) Registration number in the CNPJ/MF;
- b) Legal entity name;
- c) Main economic activity;
- d) Business address;
- e) Latest amendment of the articles of incorporation or bylaws or other equivalent corporate document of the Partner or Third-Party Service Provider duly registered with the competent authority (including, when applicable, the consolidated articles of incorporation or bylaws);
- f) Declared annual revenue;
- g) Authorization of representation;
- h) Corporate email; and
- i) Ultimate Beneficial Owners, including full name and CPF/ME.

In the case of legal representatives, attorneys-in-fact, or proxies of the Partner or Third-Party Service Provider legal entity authorized to sign the partnership or service agreement with FacilitaPay, the following minimum information must be provided:

- a) Power of attorney, when applicable;
- b) Photo of Identity Card (RG) or National Driver's License (CNH), in the case of Brazilian representatives;
- c) Photo of the National Foreigner Registry (RNE) or National Driver's License (CNH) or Passport issued by the applicable foreign authority, in the case of foreign representatives;
- d) CPF/MF registration number;
- e) Full name;
- f) Date of birth;
- g) Nationality;
- h) Phone number, including area code (DDD); (DDD);
- i) Residential address;
- j) Annual income (declarative); and
- k) Declaration regarding their classification as a Politically Exposed Person (PEP).

All the aforementioned information must be sent or updated, as applicable, by the Partner or Third-Party Service Provider to FacilitaPay via email addressed exclusively to the Legal/Compliance team.

The teams responsible for negotiations with the Partner or Third-Party Service Provider, including contractual negotiations, must forward, as applicable, all received and relevant information for the qualification of the respective party to the Legal/Compliance team for the execution of the qualification and classification procedures described below.

4.3.2.2. Legal Entity Qualification Procedure

Once the above information and documents have been received by FacilitaPay's Compliance team, the qualification procedure for Partners or Third-Party Service Providers must be initiated. To this end, the following internal processes of validation and verification of information and documentation must be carried out when the Partner or Third-Party Service Provider is a legal entity:

- a) Issuance of a simplified certificate (including a brief report, when necessary) from the competent Commercial Registry aimed at verifying certain information, such as: corporate name, share capital, address, corporate purpose, shareholder structure, branches, and the latest filed corporate document;
- b) Analysis of the essential elements of the current version of the Partner's or Third-Party Service Provider's articles of incorporation or bylaws (e.g., corporate name, address, corporate purpose, share capital, administrators, shareholder structure), including the

- powers of attorney contained therein, to assess the representatives' powers of representation;
- c) Legal analysis of the powers granted by the power of attorney (i.e., whether the powers are sufficient to sign contracts on behalf of the legal entity), signatories (i.e., whether the signatories had the authority to grant the powers in the power of attorney), validity (i.e., whether the power of attorney remains valid), and applicable formalities (e.g., whether the power of attorney has a notarized signature if private, or if it was notarized, apostilled (or consularized), sworn translated, and registered at a notary office for deeds and documents when foreign, etc.);
 - d) When applicable, the MEI Certificate attesting that the legal entity was duly established, as well as its registration with the CNPJ/MF and the competent Commercial Registry;
 - e) When applicable, the application for individual entrepreneur registration (Empresário Individual);
 - f) Verification of relevant information in the databases of the RFB (Brazilian Federal Revenue Service), ShuftiPro, and other contracted software, aiming to confirm whether the corporate name provided by the Partner or Service Provider matches the results from these sources, and if the CNPJ/MF exists and is regular in the RFB database;
 - g) Verification of information in databases of internationally sanctioned persons, including those issued by OFAC, UN, among others, as listed in Annex II of this Manual; and
 - h) Research of negative media on the internet or in other public and/or private databases (which includes the issuance of criminal background checks) and searches for evidence of previous experience online.

When validating the aforementioned documents, the Compliance area must verify: (i) whether the documents are complete and contain the necessary elements for their legality; (ii) whether the documents do not have obscured or manipulated data; (iii) whether the necessary data can be validated in the applicable documentation; and (iv) whether the documents are not expired or outdated.

Regarding the legal representatives, attorneys-in-fact, or proxies of the Partners or Outsourced Service Providers who are legal entities, the following information must be validated:

- a) Verification of the relevant information in the databases of the Federal Revenue of Brazil (RFB), ShuftiPro, and other contracted software, aiming to confirm whether the name provided by the Partner or Outsourced Service Provider matches the results from the mentioned sources, and whether the CPF/ME exists and is regular in the RFB database;
- b) Verification of the relevant information in the databases of internationally sanctioned persons lists, including those issued by OFAC, UN, among others, as listed in Annex II of this Manual;
- c) Verification of the relevant information in the ShuftiPro database, intended to check whether the legal representative indeed qualifies or not as a Politically Exposed Person (PEP), as established by the Central Bank of Brazil (BCB); and

- d) Research of negative media on the internet or other public and/or private databases (which includes the issuance of criminal certificates) and search for evidence regarding their previous experience period online.

The qualification procedures described above shall be validated through the use of FacilitaPay’s internal systems and in an automated manner, except in cases where FacilitaPay’s internal systems are not sufficiently capable of executing the aforementioned procedures, in which case a manual review shall be conducted.

Additional manual qualification procedures may be performed by FacilitaPay depending on the risk assessment of the Partner or Outsourced Service Provider and their activities, which may include, but are not limited to, geographic verification of their residential address, independent internet research regarding their profession, request for documents proving declared income, among others, at the discretion of FacilitaPay’s Compliance area, as outlined below:

Risk Evaluation	Additional Qualification Procedures
Low Risk	N/A
Medium Risk	<ul style="list-style-type: none"> • verification of the provided residential address by means of: (i) requesting a proof of residence involving an electricity or water bill (phone bills will not be accepted); and (ii) verification of the address on Google Maps and Google Earth; and • others, at the discretion of FacilitaPay’s Compliance area.
High Risk	<ul style="list-style-type: none"> • verification of the provided residential address by means of: (i) requesting a proof of residence involving an electricity or water bill (phone bills will not be accepted); and (ii) verification of the address using Google Maps and Google Earth; • verification of the declared financial capacity of the Partner or Third-Party Service Provider by requesting a simplified individual income tax return (IRPF); • in-person or virtual interview of the Partner or Third-Party Service Provider with the FacilitaPay Compliance team; and • others, at the discretion of the FacilitaPay Compliance area.

4.3.2.3. Legal Entity Classification Procedure

After completing the identification and qualification procedures for Partners or Third-Party Service Providers, if Compliance deems the potential contracting of the Partner or Third-Party Service Provider feasible, Compliance must classify the AML (Anti-Money Laundering) risks of the prospective Partner or Third-Party Service Provider considering the following criteria:

- a) FacilitaPay's capacity to combat money laundering, terrorist financing, and proliferation of weapons of mass destruction crimes, with an appropriate level of ongoing monitoring to be applied considering the risk posed by the Partner or Third-Party Service Provider;
- b) Level of risk of money laundering, terrorist financing, and/or proliferation of weapons of mass destruction that the Partner or Third-Party Service Provider presents to FacilitaPay;
- c) Nature of the Partner or Third-Party Service Provider, such as governmental entities, unregulated funds, trusts, foundations, among others;
- d) Role of the commercial activity, including assessment of activities more susceptible to illegal exploitation (casinos, betting houses and other gambling-related activities, religious and charitable entities, gas stations, among others), and the establishment of a list of "Prohibited Activities";
- e) Reputational risk to FacilitaPay;
- f) Risk associated with the partnership or service to be provided;
- g) Financial impacts;
- h) Impacts related to Environmental, Social, and Governance (ESG);
- i) Media relevant to AML;
- j) PEP - Politically Exposed Persons;
- k) Contracts signed by proxy;
- l) Geographic factors, such as border cities or those located in higher-risk countries;
- m) Number of alerts in monitoring;
- n) Dual citizenship / Foreign status;
- o) Time since the last registration review;
- p) Communications made to COAF (Financial Activities Control Council); and
- q) Incomplete registration information.

The risk classification of FacilitaPay's Partners or Third-Party Service Providers must be conducted by the Compliance team and included in the Partner or Third-Party Service Provider's registration file available in the Notion and OneDrive platforms.

After completing the qualification and classification procedures mentioned above, the Compliance team must formally forward its approval regarding the potential engagement of the Partner or Third-Party Service Provider to the Commercial, New Business, and Legal teams at FacilitaPay.

4.3.2.4. Formalization of the Engagement of Partners or Third-Party Service Providers

To engage a new Partner or Third-Party Service Provider, FacilitaPay's Commercial and New Business team must necessarily have received express approval from FacilitaPay's Legal team regarding the feasibility of the intended partnership or the possibility of executing the commercial agreement from a legal standpoint.

FacilitaPay's Compliance and Legal teams must always assess the need to require the Partner or Third-Party Service Provider to adhere to FacilitaPay's AML/CFT Policy and related documents, without prejudice to other internal FacilitaPay documents (e.g., NDA, Cybersecurity Policy, etc.).

Finally, between the start date of the relationship with the Partner or Third-Party Service Provider and, at the latest, the end of their first month as a Partner or Third-Party Service Provider, FacilitaPay must, when applicable and in accordance with instructions from its Legal and Compliance teams: (i) provide the Partner or Third-Party Service Provider with its internal policies and manuals, as applicable; and (ii) conduct training sessions, especially related to AML/CFT.

4.4. GRAPHICAL REPRESENTATION OF QUALITATIVE WEIGHTING AND RISK CATEGORY APPLICABLE TO EMPLOYEES, PARTNERS, AND SERVICE PROVIDERS

Below is a graphical representation detailing the weightings of the defined attributes and the risk profiles by attribute and risk categories.

Assessed Attribute	Applicable to	Risk Category	Criteria and Qualitative Weight
PEP (Politically Exposed Person)	All	High Risk	Automatically classified as high risk.
Negative media or criminal background	All	High Risk	Indicates potential reputational damage or misconduct.
Geographic factors (border areas, high-risk countries)	All	Medium/ High Risk	Depends on location; sanctioned countries = high risk.
Alerts in ongoing monitoring	All	Medium/ High Risk	Any alert reclassifies as medium. Multiple alerts = high risk.
Contracts signed by proxy	Providers and partners	Medium Risk	Legal and operational risk assessment.

Assessed Attribute	Applicable to	Risk Category	Criteria and Qualitative Weight
High/incompatible income with declared role	Employees	Medium/ High Risk	Requires supporting evidence and further validation.
Dual citizenship / foreign national	All	Medium Risk	Increases the level of due diligence.
Incomplete registration data	All	Medium Risk	If persistent, may lead to refusal of relationship.
Entity nature (funds, trusts, etc.)	Partners/Providers – Legal Entities	High Risk	Automatically classified as high risk due to opaque structure.
Reputational risk to FacilitaPay	All	Medium/ High Risk	Subjective; assessed based on public and private history.
Involvement in sensitive economic activities	Partners/Providers	High Risk	See list of restricted and prohibited activities in Annex I of the Manual.

4.5. CONTRACTS WITH FOREIGN-BASED FINANCIAL INSTITUTIONS

In addition to the full compliance with Section 4.3.2 of this Manual, in the event of entering into agreements with financial institutions based abroad or with correspondent banks abroad, FacilitaPay shall also:

- a) obtain information about the institution to be contracted that allows for an understanding of the nature of its activities and its reputation
- b) verify whether the institution to be contracted has been subject to investigation or action by a supervisory authority related to money laundering or terrorist financing;
- c) ensure that the contracted institution has a physical presence in the country where it is incorporated or licensed;
- d) understand the anti-money laundering and counter-terrorist financing (AML/CTF) controls adopted by the contracted party;
- e) obtain approval from an individual holding a position or role at a higher hierarchical level than the person responsible for the contracting; and
- f) inform FacilitaPay's AML/CTF Director about the partnership agreement.

4.6. CONTRACTS WITH UNLICENSED ENTITIES AND PAYMENT SCHEME PARTICIPANTS

In addition to the full compliance with Section 4.3.2 of this Manual, in the event of entering into agreements with entities not authorized to operate by the Central Bank of Brazil (BCB) and with participants of a payment scheme in which FacilitaPay also participates, FacilitaPay shall also:

- a) obtain information about the institution to be contracted that allows for an understanding of the nature of its activities and its reputation;
- b) verify whether the entity to be contracted has been subject to investigation or action by a supervisory authority related to money laundering or terrorist financing;
- c) ensure that the contracted institution is licensed by the payment scheme initiator to operate, when applicable;
- d) understand the anti-money laundering and counter-terrorist financing (AML/CTF) controls adopted by the contracted party; and
- e) inform FacilitaPay's AML/CTF Director about the partnership agreement..

If FacilitaPay enters into a legal agreement with third parties not subject to authorization to operate by the Central Bank of Brazil (BCB), who are participants in a payment scheme in which the institution also participates, the contract must stipulate FacilitaPay's access to the identification of the final recipients of the funds.

The aforementioned obligation applies to sub-acquirers (e.g., Uber, iFood, Zoop), payment gateways (e.g., Braintree), tokenization services (e.g., Samsung Pay), among others

4.7. PARTNER AND/OR THIRD-PARTY SERVICE PROVIDER RECORD UPDATE

The internal record update process for Partners or Third-Party Service Providers must be carried out using the Notion and OneDrive tools, which have been contracted by FacilitaPay specifically to support its Employees in complying with the AML Policy and this Manual.

If a FacilitaPay Employee responsible for updating the records of a Partner or Third-Party Service Provider and/or executing the procedures described in this Manual is unable to access their account on the aforementioned platforms, they must immediately contact the Compliance team at FacilitaPay.

Every 24 (twenty-four) months, at a minimum, all Partners or Third-Party Service Providers contracted by FacilitaPay must have their records updated. To this end, on the second anniversary of their relationship with FacilitaPay (and every two years thereafter), the Partner or Third-Party Service Provider must: (i) confirm that the previously submitted information and documents remain valid; and/or (ii) resend the relevant updated information to update their records with FacilitaPay.

The Legal team at FacilitaPay responsible for managing the contractual relationship with the Partners or Third-Party Service Providers shall request the record updates from the contracted parties, in accordance with the agreement signed between the parties.

Based on the updated information, the Legal team will forward the applicable data to Compliance, which must carry out a new due diligence procedure for the Partner or Third-Party Service Provider, in order to update their risk classification.

4.8. PROCEDURE FOR TERMINATION OF RELATIONSHIP WITH EMPLOYEES, PARTNERS AND/OR THIRD-PARTY SERVICE PROVIDERS

The termination of a relationship with an Employee, Partner, or Third-Party Service Provider may occur at the initiative of either FacilitaPay or the Employee, Partner, or Third-Party Service Provider, subject to the terms and conditions of the contract governing the relationship between the parties.

Notwithstanding the above, in any case, FacilitaPay must retain the right to terminate any relationship at any time, especially in the event of the following circumstances:

- a) the commission of heinous crimes, money laundering, terrorism or its financing, environmental or labor-related offenses (including conditions analogous to slave labor), among other crimes against public administration (e.g., embezzlement, active or passive corruption, fraud in public procurement) by the Employee, Partner, or Third-Party Service Provider;

The Legal department of FacilitaPay is responsible for ensuring compliance with this section in all contracts where FacilitaPay is a party, and those related to Employees are the responsibility of the Human Resources department, except when FacilitaPay's Senior Management, in an extraordinary and justified manner, approves the execution of a contract without the aforementioned rights.

5. ROLES AND RESPONSIBILITIES

5.1. FacilitaPay Employees

- a) Keep their records updated with the Human Resources Department by completing the required form;
- b) Confirm the accuracy of their registration information and keep it up to date;
- c) Comply with the legal requirements for the commencement and maintenance of the employment contract with the institution;

- d) Submit relevant information to the Compliance Department for the proper qualification of partners and service providers (whether individuals or legal entities) whose hiring is under their responsibility.

5.2. Human Resources Department

- a) Carry out the legal and internal procedures for hiring employees;
- b) Perform the identification, classification, and qualification procedures for employees, partners, and service providers;
- c) Alert the Compliance Department about monitoring alerts detected during the hiring and/or record update stages of employees;
- d) Decide, jointly with the Compliance Department, on the hiring of employees identified as "high" risk, or in the event of any suspicion;
- e) Provide newly hired employees with the institution's policies and manuals;
- f) Manage the procedures related to the termination of employment contracts with employees.

5.3. Compliance Department

- a) Carry out the identification, classification, and qualification procedures for employees, partners, and service providers;
- b) Perform manual validations of information from employees, partners, and service providers as needed;
- c) Review employees classified as "medium" risk;
- d) Decide, jointly with the Human Resources Department, on the hiring of employees classified as "high" risk;
- e) Update, at least every 24 (twenty-four) months, the identification, qualification, and classification information of partners and service providers;
- f) Conduct additional due diligence for the identification, classification, and qualification of partners and service providers based abroad, or those characterized as unauthorized entities and/or participants in payment schemes;
- g) Communicate the formal approval of partners and service providers (whether individuals or legal entities) to the Commercial, New Business, and Legal Departments;
- h) Conduct training related to AML/CFT topics for employees, partners, and service providers.

5.4. Legal Department

- a) Act on behalf of the institution in contractual, civil, or labor termination proceedings in which FacilitaPay is a party.

5.5. Executive Management

- a) Approve this Manual.

6. LEGAL BASIS

- a) Decree-Law No. 5,452/1943 (Consolidation of Labor Laws - CLT)
- b) Law No. 9,613/98 (Money Laundering Law)

7. APPROVAL HISTORY

This Manual has been duly approved by FacilitaPay's Executive Management.

Publication Date	Version	Nature of Changes	Responsible Directorate
19/07/2024	1.0	First publication	Ricardo Reis
15/07/2025	2.0	Changes to first version	Ricardo Reis

This document has a temporary validity period and may be updated at any time at the sole discretion of FacilitaPay.



ANNEX I

Prohibited Activities and Sectors

As part of our commitment to ensure compliance with our regulatory obligations and taking into account the risks involved in our services, FacilitaPay has decided to place limitations and restrictions on specific business activities and sectors in which it and/or its Customers may operate.

Any requests from Customers involved in the industries or activities listed below will be automatically rejected. FacilitaPay cannot engage in commercial relationships with Customers who sell the following items or fall into the following situations:

- Adoption agencies;
- Alcohol, tobacco, nicotine or related products;
- Asbestos;
- Biological material of human origin (i.e.: hormones, human hair, etc.);
- Products or services for augmentation of body parts;
- Cash, paper money or any other bearer securities;
- Controlled substances and/or other products that pose a risk to consumer safety;
- Corrosive and explosive materials, compressed gases and aerosols, flammable liquids, oxidizing materials, flammable solids;
- Debt collection;
- Drugs or any type of illegal substance, including products that simulate the effects of any illegal drug; as well as any substances for the manufacture of drugs and any equipment used to produce, compound, convert, process, prepare, conceal, and consume illicit drugs;
- Live animals;
- Medical practices;
- Medicines (whether sold exclusively on prescription or not) or any substances that are related to the miraculous cure of any disease or health condition, including any hospital equipment;
- Military weapons and ammunition, simulacra and controlled equipment (archery, sporting weapons, hunting equipment, replica weapons, etc.);
- Multi-level marketing companies, pyramid schemes, Ponzi schemes or any other program that promises profit or cashback with any term;
- Pawn shops; • Poisons: liquid, solid, or gaseous;
- Political parties (i.e.: campaign financing, donations and subscriptions to politicians, political causes);
- Precious metals, jewelry or any other product manufactured from these materials - Purchase or exchange;
- Products prohibited by the local Public Health Agency, Health Authority or equivalent (i.e., Anvisa, Cofepris, ISPCH, etc.);
- Products related to pedophilia, child pornography, nudity of minors, as well as articles that involve in any way the illegal participation of minors;
- Products that infringe trademarks, patents, copyrights, and other intellectual property rights (i.e.: counterfeit products);
- Prostitution agencies;
- Radioactive material;
- Religious institutions (donations or charities);
- Schedule appointments for public services;

- State-owned companies;
- Products that are stolen, stolen in any way, smuggled, counterfeit, adulterated or replicated;
- Any other product, service, or activity in jurisdictions where it is considered illegal.



ANNEX II

Sanctioned Persons Lists

- Financial Action Task Force (FATF) List: [https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/?hf=10&b=0&s=desc\(fatf_releasedate\)](https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/?hf=10&b=0&s=desc(fatf_releasedate)).
- United Nations Security Council (UNSC): <https://www.un.org/securitycouncil/content/un-sc-consolidated-list>.
- World Bank: <https://www.worldbank.org/>.
- International Criminal Police Organization (INTERPOL): <https://www.interpol.int/How-we-work/Notices/View-Red-Notices>.
- United Kingdom Financial Conduct Authority (FCA): <https://register.fca.org.uk/s/>.
- Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL): <https://ec.europa.eu/transparencyregister/public/consultation/search.do?locale=pt&res=et=>.
- United States Office of Foreign Assets Control (OFAC): <https://sanctionssearch.ofac.treas.gov/>.
- Local jurisdiction law enforcement and regulatory agencies' slave labor lists: <https://siscoaf.coaf.gov.br/siscoaf-internet/pages/cadastroPO/tipoPO.jsf>.
- Federal Administration Expulsions (CEAF): <http://www.portaltransparencia.gov.br/download-de-dados/ceaf>.
- Unfit and Suspected Companies (CEIS): <http://www.portaltransparencia.gov.br/sancoes/ceis?ordenarPor=nome&direcao=asc>.
- Disqualified Non-Profit Entities (CEPIM): <http://www.portaltransparencia.gov.br/sancoes/cepim?ordenarPor=nome&direcao=asc>.
- Penalized Companies (CNEP): <http://www.portaltransparencia.gov.br/sancoes/cnep>.
- Brazilian Federal Revenue Service regulation containing countries, jurisdictions, dependencies, or locations with favored taxation and subject to privileged tax regimes: <http://normas.receita.fazenda.gov.br/sijut2consulta/link.action?visao=anotado&idAto=16002>.
- International lists ([Shufti Pro AML Dataset December 2023.pdf](#)).