

Social, Environmental and Climate Responsibility Policy (PRSAC)

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Social, Environmental and Climate Responsibility Policy (PRSAC)

1. INTRODUCTION

The Travelex Confidence Group understands that acting with social, environmental and climate responsibility means acting diligently in its activities and relationships, offering products and services consistent with its values, committing its efforts to contribute to the sustainable development of the Group and society. as a whole in the respect, protection and promotion of fundamental rights and guarantees and of common interest.

We are aware that the operation of our business impacts our workplace, the community and the environment in which we operate in many ways. We believe that the way we manage our business can and should make a positive difference in these areas, and our objective is to ensure that continuous efforts are made to achieve these objectives, aiming in our strategic actions to preserve and repair the environment , including its recovery where possible, as well as our contributions to the transition to a low-carbon economy and reducing physical climate impacts.

2. OBJECTIVE

This Policy was prepared with the aim of presenting principles and guidelines that guide and guide the actions of the Travelex Confidence Group with regard to social, environmental and climate responsibility, as well as their respective risks. Such actions can be observed in the marketing of products and services offered by the Group to customers, in the activities and processes carried out when hiring suppliers, service providers and partners, and in relations with other interested parties, including the Group's internal community. and customers and users of products and services.

3. APPLICABILITY

This Policy applies to employees, customers, business partners, suppliers and outsourced service providers of the companies Travelex Banco de Câmbio SA and Confidence Corretora de Câmbio SA that make up the Travelex Confidence Group ("Group"), always considering the principles of Relevance (degree of exposure to risksocial, environmental and climate issues of the Group's activities and operations) and Proportionality (compatibility of PRSAC with the nature of the Group and the complexity of its activities and financial services and products).

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4. COVERAGE

This Policy establishes the necessary and required conditions for the identification of social, environmental and climate risks related to the activities, products and services carried out by the Group.

5. CONCEPTS

Interested parts: These are customers, employees, service providers, business partners, suppliers, shareholders and society, impacted by its activities.

Social risk: is the possibility of losses for the Travellex Confidence Group caused by events associated with the violation of fundamental rights and guarantees or harmful acts common interest.

Environmental risk: is the possibility of losses for the Travellex Confidence Group caused by events associated with environmental degradation, including the excessive use of natural resources.

Climate risk: is the possibility of losses for the Travellex Confidence Group caused by events associated with the increase in greenhouse gas emissions; and physical climate risk: possibility of losses for the Travellex Confidence Group caused by events associated with frequent and severe weather or long-term environmental changes, which may be related to changes in climate patterns.

6. GOVERNANCE

The Social, Environmental and Climate Responsibility Policy (PRSAC) establishes the necessary and required conditions for the identification of social, environmental and climate risks related to the activities, products and services carried out by the Group.

The Travellex Confidence Group understands that acting responsibly social, environmental and climate is to act diligently in its activities and relationships, offering products and services consistent with its values, strategic governance guidelines and actions to mitigate and reduce RSAC's impact throughout its value chain, in order to contribute for sustainable development of your business and society.

To this end, the roles and responsibilities of the Group's bodies involved in managing these risks are defined, which is part of the culture and the responsibility of all employees. However, their management is conducted by the following structure, where the key areas have the following duties and responsibilities:

6.1 Board of Directors

Approve and review the PRSAC, with the assistance of its responsible director.

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6.2 Risk Committee

For institutions classified in the S3, S4 or S5 segment, according to the methodology applied by CMN regulation, it is optional to set up a social, environmental and climate risk committee. The Travelex Confidence Group, in order to make the best efforts and effectiveness in managing the issue, established the ESG Subcommittee, which supports the competencies listed below referred to by the Monthly Risk Management Committee.

- a) Be aware of and approve the Group's PRSAC.
- b) Promote adequate and reliable disclosure of PRSAC and its implementation actions;
- c) Evaluate and approve risk management reports and other relevant regulatory reports, if necessary;
- d) Participate and contribute to the decision-making process related to the establishment and review of PRSAC, assisting the Board of Directors;
- e) Support the implementation of actions aimed at the effectiveness of PRSAC, evaluating the degree of adherence of the implemented actions;
- f) Monitor and evaluate implemented actions;
- g) Request improvement of implemented actions, when possible deficiencies are identified;
- h) Ensure the Group's adherence to PRSAC and actions aimed at its effectiveness;
- i) Ensure the compatibility and integration of PRSAC with other policies established by the Group, including credit, human resources management, risk management, capital management and compliance policies;
- j) Ensure timely correction of deficiencies related to PRSAC;
- k) Ensure that the remuneration structure adopted by the Group does not encourage behavior that is incompatible with PRSAC;
- l) Propose recommendations to the Board of Directors on the establishment and review of the PRSAC, keeping records of the recommendations.

The ESG Subcommittee ("Subcommittee") is a non-statutory, technical-consultative and permanent body, linked and coordinated by the Risk Management Committee, which has the purpose of evaluating and proposing recommendations to the Board of Directors on the establishment and PRSAC review.

6.3 Human Resources

- a) Disseminate the values and principles that guide business and the relationship between employees and customers, suppliers, the internal community and other counterparties;
- b) Provide an environment of equality, diversity and inclusion for the Group's employees, through effective actions to comply with the definitions and strategic goals for the topic;

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6.4 Legal

Ensure that the Group's contractual instruments and other official documents comply with legal and regulatory requirements and best practices in relation to RSAC in all its interactions with all its counterparties.

6.5 Products

Ensure that prior assessments of the potential social, environmental and climate impacts of new types of products and services are carried out, as well as encourage and guarantee, through these, opportunities that encourage and encourage adherence to the Institution's strategic guidelines.

Also responsible for observing the policy of prior risk analysis in the development and modification of products and services.

6.6 Regulatory Compliance

- a) Support the dissemination and strengthening of a culture of social, environmental and climate responsibility and ways of preventing associated risks;
- b) Recommend preventive or process review actions, as applicable, when non-compliance with this PRSA and applicable regulations is identified.

6.7 Financial Crimes Compliance

Consider the possible identification and assessment of social and environmental risk in PLDFT analyzes (prevention of money laundering and terrorist financing) carried out for customers, partners, suppliers and employees (KYC - Know Your Customer, KYP - Know Your Partner, KYS - Know Your Supplier, KYE - Know Your Employee) in the know your customer and monitoring

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processes, aligned with the strategy and appetite for these risks established by senior management.

6.8 Operational Risks and Internal Controls

- a) Monitor and report actual losses related to RSAC events on a loss basis, in accordance with accounting accounts established in the Group's chart of accounts to account for losses arising from social, environmental and climatic events;
- b) Monitor and evaluate the mitigation plans for corrective actions, arising from the materialization of the operational loss.
- c) Support the mapping of risks and controls with the highest degree of exposure and carry out timely tests to verify the degree of adherence in relation to PRSAC, as well as their real and potential impacts, when considered relevant;
- d) Propose process improvement actions if any relevant risk is identified without due mitigation.

6.9 Financial Risk

- a) Assess the real and potential impacts, when considered relevant, of RSAC on the strategies adopted by the Group in business;
- b) Carry out, in accordance with regulatory definition, the execution of stress tests related to RSAC.
- c) Develop the policy and correct adherence and precepts described by it;
- d) Consolidate the SAC Risk Management Report, with support from all areas involved in this process.

6.10 Credit Risk

- a) Assess the social, environmental and climate impacts of companies or projects susceptible to credit taking;
- b) Measure sustainability and responsible social practices when granting credit, favoring companies and/or customers that demonstrate commitment to the precepts and certifications described in PRSAC policies.
- c) Issue, in a format and frequency regulated by the Central Bank of Brazil, the document relevant to DRSAC that will be sent by the Financial Risk area to the regulatory body.

6.11 Facilities

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- a) Measure energy and water consumption. Propose measures to improve efficiency, if applicable;
- b) Promote awareness campaigns about the rational use of energy and water resources;
- c) Ensure waste management complies with PRSAC;
- d) Promote the maintenance and/or adaptation of the internal and external environments of offices/stores by hiring services that use clean technologies and preserve the environment.

6.12 Other Group Areas

Act in accordance with current internal and external regulations related to social, environmental and climate responsibility in your activities and relationships with stakeholders.

7. MANAGEMENT OF SOCIAL, ENVIRONMENTAL AND CLIMATE RISKS

Activities related to social, environmental and climate risk management meet the principles of relevance (degree of exposure to socio-environmental risk of the Group's activities and operations) and proportionality (compatibility of PRSAC with the nature of the Group and the complexity of its activities and its financial services and products).

The real and potential impacts, when considered relevant, of socio-environmental risk on the strategies adopted by the Group in business are assessed and, among the actions related to the management and control processes of such risks, subordinate to the Risk area, the following stand out:

- a) The development and monitoring of systems, routines and procedures that enable the identification, classification, evaluation, mitigation and control of RSAC present in the institution's activities and operations;
- b) The recording and maintenance of data relating to actual losses due to social, environmental and/or climate damage for a minimum period of five years, including values, type, location and economic sector subject to the operation;
- c) Prior assessment of the potential negative RSAC impacts of new types of products and services, including in relation to image risk;
- d) Procedures for adapting RSAC management to legal, regulatory and market changes.

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8. TRAVELEX CONFIDENCE GROUP POSITIONING

8.1 Customers, Partners and Suppliers

The acceptance criteria for the initiation and maintenance of relationships with customers, employees, service providers, business partners and suppliers adopted by the Travelex Confidence Group include, but are not limited to, checking the existence of disqualifications related to environmental damage, slave labor, labor children, sexual exploitation, corruption and any practice that violates human rights, through consultations with national sanctions lists, such as IBAMA, Ministry of Labor and Employment, Justice and Government Bodies and the main international sanctions lists (accessible public and third-party contractors), which includes OFAC, FATF, UN, European Union Sanctions and United Nations Security Council. There are restrictions on operations with companies that use slave labor and child labor.

Interested parties that have restrictions in these bodies will be duly analyzed and taken to the competent authority for deliberation on the beginning or maintenance of the relationship and other actions deemed necessary.

8.2 Diversity and Inclusion

Our employees are our greatest asset, which is why we seek to build a talented, committed and loyal team to retain and maintain these people.

For this reason, we are committed to providing an environment of equality, diversity and inclusion for all colleagues and encouraging a culture of support and inclusion, free from discrimination. We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. We do not tolerate direct discrimination or provide an environment of equality, diversity and inclusion for all colleagues, indirect harassment, bullying or any behavior that may lead to impact on colleagues, customers, stakeholders and anyone else we may generate.

Such provisions are set out in our Code of Ethics and there is an Institutional Policy and Governance that provides for the management of consequences for non-compliance with the guidelines set out therein.

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8.3 Social Actions

The Travellex Confidence Group, attentive to social issues, seeks to promote actions aimed at accelerating the adoption of good practices, as well as contributing to the reduction of social impacts through its business.

Among the related actions, the following stand out:

- a) Support for accelerating gender representation and strengthening the culture of inclusion and racial diversity;
- b) Encouragement of projects in the areas of culture, education and sports;
- c) Encouraging an ethical and transparent stance by providing accessible and appropriate reporting channels (telephone and/or form);

8.4 Environmental Actions

Following good Environmental Management practices and combating climate change, the Travellex Confidence Group has the following guidelines:

- a) Measuring and managing the consumption of natural resources with the aim of improving energy and water efficiency;
- b) Measurement and management of waste generation.

8.5 Climate Actions

In order to ensure that our business is prepared for climate challenges, the Travellex Confidence Group has the following practices:

- a) Offer financial solutions that encourage the transition to a low-carbon economy;
- b) Adoption of practices that are aligned with environmental protection and rational use of natural resources;
- c) Inclusion of climate variables in risk management.

9. DISSEMINATION AND ADVERTISING

The guidelines related to SAC responsibility adopted by the Travellex Confidence Group are disseminated through this Policy, whose internal publication (intranet) guarantees access to all employees and outsourced service providers, and external publication (on the institutional websites of Travellex Banco and Confidence Corretora) enables access for customers, business partners, suppliers and other interested parties.

However, in compliance with regulatory requirements, the Travellex Confidence Group will publish, according to the periodicity defined by the Central Bank of Brazil, the actions taken to comply with and make this Policy effective on its page on the world wide web.

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The Compliance Area is responsible for ensuring that the Travelex Confidence Group is in compliance with regulatory requirements for preparing and making these reports available to the public and to the Central Bank, within the deadlines required by this authority.

10. RELATED INTERNAL DOCUMENTS

- GGIR-POC08 - Corporate Integrated Risk Management Policy
- GGIR-NOR39 - Standard for Preventing Money Laundering and Combating the Financing of Terrorism

Document	Description	Validity
Resolution No. 4,327, of 04/25/2014	Provides for the guidelines that must be observed in the establishment and implementation of the Socio-Environmental Responsibility Policy by financial institutions and other institutions authorized to operate by the Central Bank of Brazil.	From 04/25/2014
Resolution No. 4,945, of 09/15/2021	Provides for the Social, Environmental and Climate Responsibility Policy (PRSAC) and actions aimed at ensuring its effectiveness.	From 07/01/2022
Resolution No. 4,943, of 09/14/2021	Amends Resolution No. 4,557, of February 23, 2017, which provides for the risk management structure, the capital management structure and the information disclosure policy.	From 07/01/2022
Resolution No. 4,557, of 02/23/2017	Provides for the risk management structure, the capital management structure and investment policy dissemination of information.	From 03/01/2017

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11. REPORTS

Revisions and updates to this Policy must occur annually or in accordance with the process reviews, or adjustments to legal or regulatory compliance. We declare that this is the updated version and approved by the Group Executive Committee Travellex Confidence on 11/27/2023

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