

**POLICY TO PREVENT MONEY LAUNDERING AND  
FINANCING TO TERRORISM**

**BEETELLER GROUP**

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## 1. DEFINITION

The words and expressions indicated by the first or all capital letters will have the definitions below, without prejudice to other definitions indicated in this Policy:

- **ADMINISTRATORS:** partners, administrators, and directors of **BEETELLER PROCESSAMENTO DE PAGAMENTOS LTDA**, “**BEETELLERPAY**”, and **BEETELLER FACILITADORA DE PAGAMENTOS INTERNACIONAIS LTDA**, “**BEETELLER**”.
- **COMPLIANCE AREA:** specific area of **BEETELLERPAY**, responsible for ensuring that all internal procedures and Applicable Legislation are complied with, establishing a program compatible with the nature, structure, risk profile and business model of **BEETELLERPAY**, in order to ensure the management of risks related to Money Laundering and Terrorist Financing.
- **PAYMENT ARRANGEMENT:** set of rules and procedures that regulate the provision of a particular payment service to the public by the nº 12.865/2013.
- **BACEN:** Central Bank of Brazil.
- **REPORTING CHANNEL:** communication channels made available by **BEETELLERPAY**, to receive complaints regarding activities that may be characterized as Money Laundering or Terrorist Financing.
- **CARD:** physical or electronic instruments with payment functions made available by Issuers in the form of a plastic card or other physical or digital means, for personal and non-transferable use of Carriers, accepted in THE **BEETELLERPAY** Systems for the realization of Transactions.
- **“VIRTUAL CARD”:** virtual, non-physical payment instrument issued by a Payment Institution, by which the User may make payments to the **BEETELLERPAY**.
- **CUSTOMERS:** those who, as a User, contract and use products and/or services of the **BEETELLERPAY**.
- **EMPLOYEES:** employees, service providers without employment, trainees and trainees from the **BEETELLERPAY**.
- **COAF:** Financial Activities Control Board, which acts in the prevention and fight against money laundering and terrorist financing or the following body for the same purpose.
- **FINANCING OF TERRORISM:** financial support, by any means, to terrorism or to those who encourage, plan or commit acts of terrorism.
- **SUPPLIER:** any natural or legal person, public or private, national or foreign, as well as depersonalized entities, who carry out activities of marketing products or providing services for the **BEETELLERPAY**.
- **PAYMENT INSTITUTION:** for the purposes of this Policy, is the e-currency issuer, whose activity consists of managing the user payment account, used for the payment of prepaid transactions.
- **KNOW YOUR CUSTOMER (KYC):** is the process by which **BEETELLERPAY** obtains information from Customers, and which may be indicated by Business Partners, for the purpose of, upon prior diligence, to verify their

- reputation, suitability and veracity of the registration data informed; seeking to avoid the practice of Money Laundering and Terrorist Financing.
- **KNOW YOUR PARTNER (KYP):** is the process by which BEETELLERPAY obtains information from its Business Partners and Suppliers, for the purpose of, upon prior diligence, to verify its reputation, suitability and veracity of the registration data provided; seeking to avoid the practice of Money Laundering and Terrorist Financing.
  - **KNOW YOUR EMPLOYEE (KYE):** is the process by which BEETELLERPAY obtains information from its Employees, in order to verify its reputation, suitability and veracity of the registered data informed; seeking to avoid the practice of Money Laundering and Terrorist Financing.
  - **MONEY LAUNDERING:** unlawful act for the purpose of concealing or concealing the nature, origin, location, disposition, movement or ownership of property, rights or values arising, directly or indirectly, from a criminal offense.
  - **OFAC:** Office of Foreign Assets Controls, which consists of the body of the U.S. Treasury Department, which administers and applies economic and trade sanctions against countries and foreign regimes considered terrorists, international drug traffickers, engaged in activities related to the proliferation of weapons of mass destruction and other threats to national security, foreign policy or the economy of that country.
  - **International Payments:** services provided by BEETELLER, as a facilitator of international payments, to carry out payment orders for the User or Foreign Seller.
  - **Business Partners:** any natural or legal person, public or private, national or foreign, who enters into contracts with BEETELLERPAY, with the purpose of, upon remuneration, collaborating with the company's BEETELLERPAY.
  - **PEP:** Politically Exposed Person, consisting of a public agent who performs or has performed, in the previous five (05) years, in Brazil or in foreign countries, territories and dependencies, relevant positions, jobs or public functions, as well as his representatives, family members and close collaborators, all as defined in Articles 19 and 27 of the Circular nº 3.978/2020.
  - **POLICY:** this Policy for the Prevention of Money Laundering and Terrorist Financing – PLDFT.
  - **CARRIER:** person or corporation of a legal entity, cardholder issued by the Issuers, and who may carry out Transactions through the System BEETELLERPAY.
  - **TRANSACTIONS:** for the purposes of this Policy, consist of the transactions made by the Client from his payment account, upon the contribution, transfer or redemption of financial resources, by any modality.
  - **User:** natural or legal person, holder of the Payment Account who, by adhering to the term of opening the Payment Account, is entitled to carry out Transactions through the Payment System.

- **Foreign Seller:** legal or physical entity, located abroad, responsible for the marketing of Products through the Platform, which will be the final recipient of the resources submitted to Ashipping Order by the User or original sender of the Ticket Order (as applicable), and payment orders may be sent or received by the Foreign Seller directly or through a representative.

## 2. APPLICABLE STANDARDS

All those to whom this Policy applies shall comply with the laws and regulations set out below (together "Applicable Legislation"):

- **LAW Nº 9.613/1998:** on the crimes of Money Laundering and the prevention of the use of the financial system for the unlawful acts provided for in this law.
- **LAW Nº 12.865/2013:** payment arrangements and payment institutions that are part of the Brazilian Payment System (SPB).
- **LAW Nº 13.260/2016:** discipline the Financing of Terrorism.
- **RESOLUTION COAF Nº 29/2017:** procedures to be observed by persons regulated by the COAF.
- **CIRCULAR BACEN Nº 3.680/2013:** on the payment account used by payment institutions for transaction records.
- **CIRCULAR BACEN Nº 3.691/2013:** on the foreign exchange market.
- **CIRCULAR BACEN Nº 3.885/2018:** establishes the requirements and procedures for authorisation for the operation of the Payment Institutions by the Bacen.
- **CIRCULAR BACEN Nº 3.978/2020:** provides for the policy, procedures and internal controls to be adopted by the institutions authorized to operate by the Bacen, aiming at preventing the use of the financial system for the commission of money laundering and terrorist financing crimes.
- **CIRCULAR LETTER BACEN Nº 4.001/2020:** discloses a list of transactions and situations that may constitute evidence of the occurrence of the crimes of Money Laundering and Terrorist Financing, which can be reported to the COAF.

The laws and norms are cited in an illustrative manner, and do not exhaust all applicable legislation to the activities of the BEETELLERPAY. The Compliance Area will be responsible for verifying any update, revocation and the editing of new.

A BEETELLERPAY, acts as Payment Arrangement Institute and Payment Institution, not requiring authorization to operate bacen, terms of the Circulars nº 3.682/2013 e 3.885/2018.

A BEETELLER, acts as a Facilitator of International Payments, in accordance with the Circular nº 3.691/2013 do Bacen.

A BEETELLERPAY will make the change to this Policy, in compliance with the full monitoring and selection procedures provided for in the Bacen nº 3.978/2020, as well as, if it is to request operating authorization from Bacen for the modalities of Payment Arrangement Institute and Payment Institution.

For a better understanding of applicable law by all persons covered by this Policy, the BEETELLERPAY Clarifies:

The crime of Money Laundering aims to disguise the nature, origin, location, movement or ownership of property (money, assets, real estate, furniture, among others) obtained with the practice of illicit acts. Through Money Laundering, assets or resources of "dirty" or illegal origin return to the formal economy with the appearance of "clean" or legal, which makes it difficult to punish the agent for the criminal practice carried out.

There are three phases that characterize Money Laundering: Placement, Concealment and Integration:

- **PLACEMENT:** aims to insert illicit assets or resources into the formal economy, i.e. in lawful companies or businesses. This phase consists of the introduction of the unlawful good or resource in the financial system, making it difficult to identify its origin.
- **CONCEALMENT:** measures aimed at making it difficult to trace illicit goods or resources. At this stage there is the attempt to camouflage the evidence and the connection between the good and the crime committed. Several financial transactions can be carried out in order to add complexity and hinder future tracking.
- **Integration:** once hidden and "washed", in different financial transactions, the assets or resources return to agents through the simulation of seemingly lawful business.

Money Laundering is typified as a crime in the Law nº 9.613/1998 and is punished with imprisonment from 03 to 10 years, fine and other penalties. It is not necessary to configure all three phases of the crime, because each phase alone is already considered as Money Laundering.

Terrorist Financing is related to the covert distribution of goods or resources to be used in acts and/or by terrorist organizations, as well as the financing of the proliferation of weapons of mass destruction. The methods used are generally similar to those used in Money Laundering.

### 3. POLICY OBJECTIVE

BEETELLERPAY, through this Policy establishes its procedures to be followed by its Administrators, Employees, Suppliers, Customers, Business Partners, in the following ways:

BEETELLERPAY is a Payment Arrangement Institution and Payment Institution issuing electronic currency, pursuant to Law No. 12,865/13 and the Bacen Circulars in 3.680/2013 e 3.885/2018.

Among the services offered, BEETELLERPAY performs the management and custody of financial resources of clients, and which may be indicated by Commercial Partners, enabling the receipt and realization of payments through transactions.

BEETELLER acts as an International Payment Facilitator, pursuant to the Circular nº 3.691/2013 do Bacen.

Among the services offered, BEETELLER intermediates payments abroad, and may perform: (i) remittance of user resources to Foreign Sellers, for the sole purpose of making the payment of International Purchases; and (ii) entry of funds for payment to the User of amounts owed to him by foreign sellers.

For the operation of Beeteller International Payment Facilitator will use an institution authorized by Bacen to operate in the foreign exchange market and carry out international transfers of resources, for the realization of the Payment Order.

Thus, Customers and Business Partners may not attempt to use the services provided by BEETELLERPAY for the commission of crimes related to Money Laundering and Terrorist Financing, by concealing or concealing the nature, origin, location and movement of resources arising from criminal offenses, in order to incorporate them into the financial system.

Therefore, this Policy aims to define the guidelines on which the prevention of money laundering and terrorist financing is based on the activities of BEETELLERPAY, as a Payment Arrangement Instituter and Payment Institution. BEETELLERPAY will adopt, through its Compliance Area, internal standards, standards, procedures, training, corporate communication and preventive, corrective and punitive measures, in order to make BEETELLERPAY, in all areas, adhere to this Policy.

Also, BEETELLERPAY provides a Reporting Channel, which will carry out the appropriate treatment of occurrences forwarded by e-mail [compliance@beeteller.com](mailto:compliance@beeteller.com) through: receipt, preliminary analysis, classification, treatment, monitoring, investigation, decision making, reporting of complaints and closure of occurrences.

BEETELLERPAY will receive and act in the complaints of Administrators, Employees, Suppliers, Customers, Business Partners or any third party, about atypical or suspicious activities that may be characterized as indications of crimes related to Money Laundering and Terrorist Financing.

The complaints will be received by a qualified professional with necessary autonomy, being guaranteed the anonymity and confidentiality of communications, as well as the preservation of the integrity of the whistleblower.

#### **4. POLICY SCOPE**

This Policy covers all areas of BEETELLERPAY, its Administrators, Customers, Employees, Suppliers and Business Partners, who must agree, adhere to and compel themselves to respect what is herein. Through the Compliance Area, all will be communicated and trained to identify possible crimes of Money Laundering and Terrorist Financing, as well as to report suspected illegal activities in the Reporting Channel.

#### **5. COMPLIANCE AREA ASSIGNMENTS**

The Compliance Area will be responsible for ensuring that all BEETELLERPAY internal procedures are complied with.

It is the Compliance Area that should promote the organizational culture of



prevention of money laundering and terrorist financing, including Administrators, Customers, Employees, Suppliers and Business Partners.

Through the Compliance Area, BEETELLERPAY will assign specific obligations and actions to other business areas, in particular:

- **COMMERCIAL:** observe KYC and KYP processes for Customers and Business Partners.
- **BID:** observe the KYP process with respect to Suppliers, through registration and verification of the information provided after the Proposal Request / Request for Proposal ("RFP"), Request for Information ("RFI") or Request Request For Quotation ("RFQ"), or other procurement processes as applicable.
- **CONTROLLING:** maintain the good performance of BEETELLERPAY's activities, creating methodologies and systems that develop management controls, working in conjunction with the Compliance area, for process optimization and mitigation of risks and indications of money laundering crimes and terrorist financing.
- **FINANCIAL:** establish procedures for treasury functions, control of accounts payable and receivable, management of third-party resources, accounting, planning, tax management and risk control of possible evidence of fraud.
- **LEGAL:** establish and ensure compliance, among other activities, with this Policy and the requirements of applicable law.
- **MARKETING:** observe the KYP process with respect to Suppliers, through registration and verification of information provided by RFP, RFI or RFQ, or other processes of registration and verification of the information provided as applicable. As well as the KYE process with respect to Employees in the functions of actions and marketing campaigns, gifts, awards, etc., as applicable.
- **OPERATIONS:** observe KYC and KYP processes for Customers, Suppliers and Business Partners, with regard to operational, logistics, accreditation, account opening and customer qualification processes.
- **HUMAN RESOURCES:** establish KYE criteria and processes for the selection and hiring of Employees who have a profile consistent with this Policy, and in compliance with the degree of responsibility of each Employee regarding the fulfillment of the responsibilities assigned to him in the procedure of analysis, registration, monitoring and communication of suspicious activities.
- **IT:** act diligently in authorising access to systems, information security, data protection and confidentiality and for maintaining the technological tools to be used, in order to curb actions aimed at encouraging the practice of Money Laundering and Terrorist Financing.

Each of BEETELLERPAY's areas shall, through its Respective Employees, communicate to the Compliance Area about suspicious activities related to Money Laundering and Terrorist Financing.

It will be up to the Compliance Area: (i) to create and manage control mechanisms

aimed at preventing money laundering and terrorist financing; (ii) create and coordinate the communication and training of Administrators and Employees; (iii) ensure compliance with the mechanisms of action of the Reporting Channel; (iv) monitor occurrences of atypical or suspicious transactions identified by BEETELLERPAY's technological tools or communicated by Employees; (v) the framing and monitoring of PEP, when necessary; (vi) the analysis of Customers, Suppliers and final beneficiary involved in sanctioning lists; and (vii) communication with COAF and Bacen.

Furthermore, the Compliance Area should ensure the wide dissemination of this Policy to Suppliers and Business Partners, as well as ensure that its conditions are provided for in contracts with Customers.

It is also the responsibility of the Compliance Area to analyze new products and services from BEETELLERPAY in order to identify vulnerabilities in the face of the need to prevent money laundering and terrorist financing.

## **6. KNOW YOUR CUSTOMER (KYC), KNOW YOUR PARTNER AND SUPPLIER (KYP) AND KNOW YOUR EMPLOYEE (KYE)**

KYC and KYP procedures are intended to prevent BEETELLERPAY's activities from being used in any way for the commission of any of the crimes listed in this Policy. Furthermore, this process aims to maintain the integrity and image of BEETELLERPAY before its Administrators, Customers, Employees, Suppliers, Business Partners and also before society.

The data provided in the KYC and KYP procedures will be confirmed by sending documents and/or through consultation in public or private databases, such as credit and risk analysis bureaux, as well as an internal database or shared by other companies. There will be storage of the information obtained in the KYC and KYP procedures, which must be compatible with the risk profile defined by the Compliance Area, according to the nature of the business and the risk to which BEETELLERPAY will be exposed.

Registration information will be archived for a minimum period of five (5) years, counted from the first day of the following year after the end of the relationship with the Customer, Supplier or Business Partner. Tests should be carried out every 12 months for the validation of registration information. Any inconsistencies will be dealt with in a timely manner, with a view to regularizing.

### **A. KNOW YOUR CLIENT (KYC)**

The KYC process, aims to implement procedures aimed at knowing the respective Customers, with the adoption of prior and periodic diligence that ensures their identification, qualification and classification, preventing the occurrence of Money Laundering and Terrorist Financing aims to implement procedures aimed at knowing the respective Customers, with the adoption of prior and periodic diligence that ensures their identification , qualification and classification, preventing the occurrence of Money Laundering and Terrorist Financing.

BEETELLERPAY shall only accept potential Customers who perform lawful activities and are not contrary to applicable law. In the register of Customers,

BEETELLERPAY should always observe the following procedures:

- a. The registration of customers will be carried out in an individualized and standardized manner, containing all personal data and information required by current legislation;
- b. The consultation will be held on the veracity, suitability and timeliness of the information;
- c. There will be a consultation of information available on sites specializing in the prevention of money laundering and terrorist financing;
- d. Clients who engage in business or professional activity will be classified according to their field of activity, and there will be consultation with public or private sources for information validation;
- e. The Client will be classified according to his activity, registration information and asset situation;
- f. There will be specific classification for Customers considered as PEP;
- g. There will be no approval of the registration of potential Customers included in the list of OFAC;
- h. At any time, including after registration, you may be asked to submit additional information, statements and documents for validation of the information;
- i. Customer information will be updated periodically for a period of not more than twelve (12) months.

Each Client will be classified according to a specific risk profile, to enable the control and monitoring of Transactions, being: (i) individual, (ii) legal entity, (iii) simplified registration, (iv) complete registration; (v) business or professional activity carried out; (vi) PEP; and (vii) part of the OFAC list. After the risk classification, the Client may: (i) have his registration request denied; (ii) suffer restrictive measures, through the unavailability of certain services or the limitation of the value of transactions; (iii) have Enhanced Monitoring (as defined below), or (iv) have the blocking or termination of the relationship. The internal standards of the Compliance Area will detail which restrictions will apply.

BEETELLERPAY will establish risk mitigation criteria in the accreditation of Customers who do not prove the development of business or professional activity, by setting a maximum limit for the realization of transactions in certain periods, according to the criteria defined by the Compliance Area, in accordance with current legislation. If the Customer develops business or professional activity in a physical establishment, BEETELLERPAY or a Business Partner (if applicable) may, physically or remotely (including using geolocation technologies), verify the effective existence of the establishment at the indicated location.

## **B. KNOW YOUR PARTNER (KYP)**

The KYP process aims to implement procedures aimed at getting to know Suppliers and Business Partners, with the adoption of prior and periodic diligence that ensures their identification, qualification and classification, preventing the occurrence of Money Laundering and Terrorist Financing. In the register of

Suppliers and Business Partners, BEETELLERPAY should always observe the following procedures:

- a. Register in an individualized and standardized manner, containing all the information required in the RFP, RFI or RFQ process, or other procurement processes defined by BEETELLERPAY;
- b. Conduct the consultation on the veracity, suitability and timeliness of the information;
- c. Consult the information available on websites specialized in the prevention of money laundering and terrorist financing;
- d. Perform the analysis of the credit and indebtedness situation;
- e. Conduct media research to verify the existence of negative news related to Money Laundering or Terrorist Financing;
- f. At any time, including after registration, request the sending of additional information, statements and documents for validation of the information.

The Supplier or Business Partner may be classified according to its business or professional activity, if a risk profile associated with its activity is identified, according to the internal standards of the Compliance Area. The following procedures will be observed with respect to the Partners, Directors, Directors and/or representatives of Suppliers and Business Partners: (i) consultation in the PEP list and OFAC list; (ii) verification of identification documentation; and (iii) other procedures provided for in the preceding item, as applicable.

Due to the KYP process, you may be refused to hire with any Supplier or Business Partners.

If the business or professional activity carried out by the Supplier or Business Partner is classified as being high risk, there will be enhanced monitoring on the amounts received.

The remuneration to be paid by BEETELLERPAY, regardless of its nature, shall be settled into a payment account or bank account held by the respective Supplier or Business Partner.

Contracts to be concluded with Suppliers and Business Partners must necessarily include specific obligations related to the prevention of money laundering and terrorist financing.

### **C. KNOW YOUR EMPLOYEE (KYE)**

The selection and hiring of Employees, including third parties, will be carried out with the aim of reducing the risk of illegal practices of any kind, including the prevention of money laundering and terrorist financing, regardless of position or function.

The managers of the respective areas of BEETELLERPAY are responsible for identifying and communicating the Compliance Area about behaviors contrary to the provisions of this Policy, or other policies and procedures adopted by the Human Resources area of BEETELLERPAY.

BEETELLERPAY, through its Human Resources area, establishes criteria and processes for the selection and hiring of Employees who have a profile consistent

with this Policy, aiming at fulfilling the responsibilities assigned to it in the exercise of its activities.

The monitoring of Employees will be carried out in accordance with the nº 9.613/98, especially of your articles 9º, 10 e 11. There should be treatment isonomy in this conduct, covering all employees, and monitoring for discriminatory purposes should be sealed. BEETELLERPAY shall communicate this monitoring to the Employee in advance, upon delivery of this Policy or express mention in its employment contract.

## **7. POLITICALLY EXPOSED PEOPLE (PEP)**

The Compliance Area will indicate the procedures that must be adopted in order to qualify Customers, Suppliers and Business Partners (as well as their Partners, Directors, Directors and/or Representatives) as PEP.

The qualification of Customers, Suppliers and Business Partners will be carried out by consulting the available public and private lists or by means of self-declaration that will appear in the register of each of them.

The approval of the registration of the Client, Supplier or Business Partner classified as PEP must be reported to the Compliance Area, who will be able, exclusively, to approve or not the registration. In the event of approval, the respective areas shall report to the Compliance Area all transactions carried out by PEP Customers.

## **8. PROCEDURE FOR RECORDING OPERATIONS**

Each area of BEETELLERPAY, according to its duties, will be responsible for, together with the Compliance Area, develop the processes to keep records of transactions made by customers.

The records must be made in accordance with the following modalities, in which it is appropriate to:

- a. Resource contribution, transfers, or redemption transactions;
- b. Transactions made by the Client himself or to/from third parties, considering the registration in the Client's CPF or CNPJ;
- c. Transaction modality, such as, as applicable, bank slip, prepaid card, postpaid card, virtual card, transfer by financial system, international transfers, transfer by other payment arrangements, or upon cash collection;
- d. Transaction Date;
- e. The value and currency of each transaction;
- f. Regarding the Customer in Brazil of the Facilitator of International Payments, the CPF or the CNPJ, the name and, in the case of purchase of good or service abroad, the form of payment used; And
- g. In relation to the buyer or seller abroad, the Facilitator of International Payments, its name and country.

In the transaction scan will also identify the necessary information about the origin, destination and final beneficiary of the resources. For the monitoring of Transactions, the Compliance Area shall stipulate, in addition to the above-

mentioned records, the value of the Transactions and the monitoring and selection criteria that allow identifying suspicious Transactions.

BEETELLERPAY will keep records of all transactions carried out by Customers, which will be archived for a minimum period of five (5) years, counted from the first day of the year following the completion of the transaction and, in the case of information and resource transfer records, the term will be 10 (ten) years.

## **9. MONITORING AND ANALYSIS OF OPERATIONS AND SUSPICIOUS SITUATIONS**

The Compliance Area will be responsible for monitoring and selection procedures that allow identifying Transactions and situations that may indicate suspected money laundering and terrorist financing. For the monitoring of Transactions should be used technological monitoring tools and with automatic alerts of atypical activities. Transactions may be automatically disproved and cancelled in which, in accordance with the monitoring procedures established by the Compliance Area, there are indications of Money Laundering or Terrorist Financing, due to the:

- a. Customer's habituality, value, periodicity, form or history in relation to previous Transactions;
- b. In order to generate gain, without the reasoned economic benefit;
- c. Unjustified omission or delay in sending information and/or documents by the Customer;
- d. Significant oscillation in relation to the volume and/or frequency of Transactions;
- e. Sudden and unjustified change in the modality or value of the Transaction;
- f. Incompatibility with the Client's financial capacity, in view of its income, billing or equity;
- g. Continuous repetition of Transactions between the Client and the same beneficiary;
- h. Compensation of credits and debits between the Client and the same beneficiary;
- i. Customer's performance on behalf of third parties;
- j. It is suspected that the beneficiary, by interposed person, is the Client himself;
- k. Difficulty or impossibility of identifying the final beneficiary;
- l. Finding of erroneous, untrue or outdated customer information; and
- m. Complaints received by the Complaints Channel.

The BEETELLERPAY Compliance Area, in accordance with the criteria set forth in this Policy, shall establish a procedure for monitoring specific Customers or Transactions ("Enhanced Monitoring").

There will be Enhanced Monitoring when the Transaction is carried out: (i) per Client considered PEP; (ii) in a value greater than the established limit; (iii) by a legal entity Client, who, due to the activity developed, is classified as high risk; (iv) for the same value, repeatedly, on the same day; (v) by transaction amounts that are different from the Customer's daily behavior (time, value, transaction capture

modality, etc.) or (vi) by sales increase in the amount 50% (fifty percent) higher than the total volume of Transactions carried out in the previous month, in an inexplicable way or without the consolidation of the Client's operation.

Transactions subject to Enhanced Monitoring must be approved manually by the responsible area. If there is suspicion of irregularity, the Employee of the area: (i) shall not approve the Transaction; and (ii) you should contact the Customer to request additional information and documents. For Transactions in amounts above the established limit, the Client must supplement his registration information and forward the necessary documents.

For the analysis of the lawfulness of the Transaction, documents must be requested to prove its regularity and lawfulness, and are accepted, cumulatively: (i) contracts for the purchase and sale of the goods or provision of services; (ii) invoice; and (iii) proof of delivery of goods or services.

The documents must be forwarded to the Compliance Area for analysis, who will be responsible for approving the Transaction or not.

During the review procedure, the Compliance Area should adopt the following procedures:

- a. Blocking customer access to BEETELLERPAY's electronic platform and suspension of services;
- b. Withholding of the amounts until the investigation of the legality of the Transaction;
- c. Notice of termination of the contract entered into with the Client in the event of non-approval of the Transaction.

If the Transaction is not approved due to indications of suspected fraud, the resources must be returned to the sender, in a bank account of the same ownership, and by signing a receipt or declaration by the recipient, giving full discharge of the refund.

The atypical Transaction should always be reported to the Compliance Area by employees, even if there is contact with the Client and sending documents and information.

## **10. COMMUNICATION PROCEDURE TO THE COAF**

BEETELLERPAY, through the Compliance Area, is responsible for making communications to COAF of Transactions deemed suspicious, pursuant to this Policy, through: (i) the Financial Activities Control System (SISCOAF) or (ii) the Reporting, Complaints and Requests system (RDR).

The procedures will be adopted depending on the regulatory framework of BEETELLERPAY.

In accordance with applicable law, BEETELLERPAY shall refrain from providing Customers with information about any communications made as a result of evidence of money laundering or terrorist financing.

The communication to the COAF will be carried out within the legal period. In the event of no communications in a given year, BEETELLERPAY will provide a negative statement in the form of applicable law.

The Compliance Area will meet any demand, request or request for clarification from COAF and Bacen.

## **11. COMMUNICATION AND TRAINING**

The responsibility for the communication and training of BEETELLERPAY Administrators and Employees rests with the Compliance Area, which, together with the Human Resources and Marketing areas, should prepare all appropriate documentation for the communication, training and proof of science and participation of those involved.

The training will be held: (i) whenever there is the admission of new Administrators and Collaborators; (ii) periodically, within a period of not more than one (1) year, or (iii) if there is any change in this Policy or internal procedures adopted by the Compliance Area, or to the detriment of the legislation in force.

The training will be carried out by those responsible for the Compliance Area, in person or remotely, and that you can count on the help of external advisors.

Furthermore, the Compliance Area shall communicate the procedures provided for in this Policy for Suppliers and Business Partners.

The disclosure of this Policy is intended to disseminate standards of integrity and ethical conduct as part of BEETELLERPAY's culture, and for the purpose of ensuring full compliance with legal duties.

## **12. GENERAL PROVISIONS**

Senior Management is responsible for revising, amending and updating this Policy, where necessary.

This Policy shall be approved by beetellerpay's Senior Management in accordance with its internal.

The Compliance Area, as applicable, will maintain documents, minutes, reports, risk assessments and manuals related to the prevention of money laundering and prevention of terrorism.

This Policy is effective from the date of its publication and will be in force for an indefinite period and shall be revised whenever necessary.

This Policy is accompanied by a PLDFT Term of Adoption, and a Term of Adoption the Amendments to this PLDFT.



<b>Author:</b>	Barcellos & Tucunduva Advogados
<b>Approved by:</b> Lauriney Leite dos Santos CFO	<b>Lauriney S</b>
<b>Approved by:</b> Kelly Viviane da Silva CCO	<b>Kelly S</b>
<b>Approved by:</b> Caio Souza Vidal de Negreiros CTO	<b>Caio fi</b>

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**APPENDIX 1****CONTRACT OF ADHESION TO PLDFT**

I, \_\_\_\_\_, registered in the CPF under the nº \_\_\_\_\_, I declare that I am aware of this Policy for the Prevention of Money Laundering and Terrorist Financing, as well as the guidelines contained in other policies, standards and internal procedures of BEETELLERPAY.

I am aware of BEETELLERPAY's activities and how much it can attempt to be used for the practice of Money Laundering and Terrorist Financing crimes, so, within the obligations of my function, I must, where necessary, use the Reporting Channel to report any suspected activity and/or treated as criminal by this Policy and BY BEETELLERPAY.

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

Date

\_\_\_\_\_  
Signature

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**APPENDIX 2**

**TERMS OF ACCESSION TO THE AMENDMENTS TO THIS PLDFT**

I, \_\_\_\_\_, registered in the CPF under the nº \_\_\_\_\_, I declare that I am aware of the changes made to this Policy for the Prevention of Money Laundering and Terrorist Financing, as well as the guidelines contained in the other policies, standards and internal procedures of BEETELLERPAY.

I am aware of BEETELLERPAY's activities and how much it can attempt to be used for the practice of Money Laundering and Terrorist Financing crimes, so, within the obligations of my function, I must, where necessary, use the Reporting Channel to report any suspected activity and/or treated as criminal by this Policy and BY BEETELLERPAY.

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_








Date

\_\_\_\_\_

Signature

## Página de assinaturas

**Lauriney S****Lauriney Santos**  
639.655.501-87  
PAGAMENT...  
Signatário**Kelly S****Kelly Santos**  
BEETELLER PROCESSAMENTO DE  
Signatário**Caio f i****Caio Negreiros**  
BEETELLER PROCESSAMENTO DE PAGAMENT...  
Signatário**HISTÓRICO**

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