
ANTI-CORRUPTION POLICY
PAGSEGURO INTERNET INSTITUIÇÃO DE PAGAMENTO S.A. E
BANCOSEGURO S.A

ANTI-CORRUPTION POLICY	Departments in charge:	Legal Regulatory Compliance
	Date:	October/2023

Validity and Update

This Policy is valid for 2 (two) years as of the last revision indicated in the table at the end of the document, and it must be reviewed and updated before the expiration date in the event of changes in the applicable legislation and/or strategic guidance of the Conglomerate.

Any changes to this Policy must be previously reviewed by the Regulatory Legal department.

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1. INTRODUCTION AND PURPOSE

This **Anti-Corruption Policy** ("Policy") of **PagSeguro Internet Instituição de Pagamento S.A.** ("PagBank"), the leading institution of the Prudential Conglomerate, and **BancoSeguro S.A** ("BancoSeguro"), both institutions belonging to the Prudential Conglomerate of PagSeguro, collectively referred to as the "Companies", aims to establish the guidelines to be adopted by the Companies and the responsibilities that reinforce the companies' commitment to preventive and anti-corruption practices in conducting activities and making decisions to promote high standards of transparency, ethics, integrity, and governance in the conduction of businesses and relationships with the government, agencies, and government authorities at the federal, state, and municipal levels.

This policy was prepared under all internal and external regulations applicable to the subject in force, including but not limited to Law 12,846/13, which provides for the "administrative and civil liability of legal entities for acts against the Brazilian or foreign government", Law 12,813/13, which addresses "conflict of interest in the exercise of positions or employment in the Executive Branch and subsequent impediments to the exercise of positions or employment", Law 8,429/92, which addresses administrative misconduct, and Decree 11,129/22, which regulates Law 12,846/13. For those companies within the group whose activities are regulated by the Central Bank of Brazil ("BCB"), BCB Resolution 85 and Resolution 4,595/2017, which establish Compliance policies, have also been considered.

2. COVERAGE

This Policy applies to all professionals of the Companies at any hierarchical level, partners, and service providers, whether individuals or legal entities, contracted and/or sub-contracted, regardless of their physical or virtual structure and/or form of access, whether local or remote, to the Companies' environment.

3. DEFINITIONS

Government: The several bodies, services, and entities of the direct and indirect government (foundations, agencies, public companies, and state-owned companies), and their agents. For the purposes of this Policy, this concept includes all State apparatus at all levels (Federal, State, and Municipal) and powers (Executive, Legislative, and Judiciary) for the provision of public services, for the management of public assets and community interests, as well as their respective representatives.

Agencies: legal entities governed by public law, created by specific law, which possess their own assets and perform typical State activities in a decentralized manner.

Public Agents/Government Authority: any government-appointed or elected agent or public employee, regardless of level or power; any employee or other person acting for or on behalf of a representative of the government, agency, government agency, or entity performing a governmental function in Brazil; any employee or other person acting for or on behalf of any

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entity controlled by a government or in which government equity stake exceeds 50% (fifty percent), including state entities and sovereign funds; any political party, executive, employee, or other person acting for or on behalf of a political party or any candidate for public office; any employee or person acting for or on behalf of a public international organization (e.g., United Nations, World Bank); or any executive, employee, or person acting for a regional or local authority.

Whistleblowing Channel: Provided by the Human Resources department for anyone to anonymously or not (if desired) report or provide information about conduct they perceive as contrary or potentially offensive to the Company’s values, current legislation, and this policy.

Corruption: Corruption is related to bribery, i.e. the act of offering something to gain an advantage, favoring one person over others.

Due Diligence: A methodic procedure for analyzing information and documents with a predetermined goal of understanding the organization and its administrators with which the companies intend to relate.

Money Laundering: An illicit procedure used to disguise the origin of illegal funds. Federal Law 9,613/98 provides for the crimes of “laundering” or concealment of assets, rights, and values; the prevention of the use of the financial system for the offenses provided for in this Law; creates the Financial Activities Control Council (COAF), among other provisions. Federal Law 12,683/12 amends Law 9,613, of March 03, 1998, to make criminal prosecution of money laundering crimes more efficient.

Bidding Process: The formal administrative procedure for contracting services or acquiring products by entities of the direct or indirect Government. In Brazil, Bidding Processes are generally regulated by Law 8,666/1993 (General Bidding Processes Law), Law 14,133/2021, or any others that may replace them. There are also more specific regulations applicable to certain situations, such as Law 10,520/2002 (which regulates bidding processes in the auction modality); Decree 5,450/2005 (which regulates electronic bidding sessions), and Law 13,303/2016 (which provides for the articles of incorporation of public companies, government-owned companies, and their subsidiaries).

PagSeguro and Regulated Companies: the group of companies that are part of the conglomerate, whose leading institution is PagSeguro, and which are also regulated by the Central Bank of Brazil. It currently includes the following companies: PAGSEGURO INTERNET INSTITUIÇÃO DE PAGAMENTO S.A. (leader); BANCOSEGURO S.A.; WIRECARD BRAZIL INSTITUIÇÃO DE PAGAMENTO S.A. Other companies may be included.

4. ROLES AND RESPONSIBILITIES

The Companies’ Senior Management defines the organization’s conduct guidelines and values, which must be observed by all administrators, employees, suppliers, and partners, in any relationships, to prevent and fight all forms of corruption or other illicit acts. PagBank ensures the allocation of financial, material, and human resources for the implementation, maintenance, and progress of its Ethics, Compliance, and Anti-Corruption programs.

All individuals covered in this Policy are responsible for:

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- a) Understanding Brazilian anti-corruption legislation, this Policy, as well as other internal rules of the Companies related to the matter, resolving any doubts with their immediate manager or the *Compliance and/or Regulatory Legal Department (depending on each business unit)*;
- b) Refraining from engaging in any acts with the intent of obtaining undue advantages for themselves or others;
- c) Seeking clarification on any activities within the Companies that they become aware of and that may constitute harmful acts, such as contracts unrelated to the Companies' activities; meetings with public agents outside the Companies' activities; issue or payment of invoices without identification numbers and service descriptions; among others;
- d) Reporting any unusual situation, as described in item 8 of this Policy.
- e) Being aware of and adhering to this Policy, ensuring that all third parties and partners in their relationships are informed of its content;

4.1. Compliance

- a) Resolve doubts related to this Policy or anti-corruption practices; and
- b) Assist, together with the Human Resources department, in handling all reports received, and submitting the analysis results to the Corporate Governance Committee, which should resolve on any disciplinary measures and corrective actions.

4.2. Operational Risk Department

For PagBank and Regulated Companies, it is the responsibility of the Operational Risk department to identify and periodically assess the potential risk incurred in the Companies' activities involving inappropriate practices related to this Policy. This risk should be included in the risk matrix, with reporting to the Director responsible for Operational Risk, and, depending on the severity of the matter, it will be reported to the Corporate Governance Committee.

4.3. Legal Department

The Company's Legal department should ensure that contractual instruments executed with suppliers, representatives, service providers, and business partners contain provisions ratifying the Company's aversion to corruption practices, as well as clauses aiming to protect against any harmful actions they may promote.

4.4. Human Resources Department

The Human Resources department should maintain an appropriate whistleblowing channel for the reporting of occurrences that do not comply with laws, regulations, and internal policies, violations of the Code of Ethics, or any deviations from behavior, confidentially and anonymously, keeping a record of the reports received. It should instruct the whistleblower to provide complete and accurate information, enabling the Companies to act to prevent any inappropriate or unlawful practices.

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5. GUIDELINES

The companies prohibit and do not tolerate any practice of corruption, bribery, payment, or receipt of bribes, either with the Brazilian or foreign Government, or with Private Companies, based on Brazilian and international anti-corruption laws. Expressly prohibited conduct includes:

- Promising, making, paying, authorizing, offering, suggesting, granting, giving, or providing, directly or indirectly, upon request or not, any undue advantage of any nature (financial or not), to any individual or Government Authority (including first-degree relatives of said agent), with or without the intention of influencing or rewarding any official action or decision of such person in favor of the Companies, except for gifts and presents previously authorized and within the limits established by the Companies;
- Financing, funding, sponsoring, or subsidizing the practice of illicit acts outlined in the Anti-Corruption Law (Law 12,846/13);
- Making payments of additional fees to expedite routine processes that are not expressly provided for by law. Only payments of fees officially made directly to the public body, through their own payment bills, will be accepted;
- Using an intermediary individual or legal entity to hide or disguise their real interests or the identity of the beneficiaries of the acts performed;
- Hindering investigation or inspection by public agents, including within the scope of regulatory agencies and, when applicable, by supervisory bodies of the National or foreign Financial System;
- In cases of bidding processes or contracts executed with the government, the following acts are prohibited:
 - Frustrate or defraud, through an arrangement, combination, or any other expedient, the competitive nature of the bidding procedure;
 - Prevent, disrupt, or defraud the conduct of any act of the bidding procedure;
 - Exclude or seek to exclude a bidder, through fraud or by offering any type of advantage;
 - Establish, fraudulently or irregularly, a legal entity aiming to participate in a bidding process or execute an administrative contract;
 - Obtain undue advantage or benefit, fraudulently, from modifications or extensions of contracts executed with the government, without authorization by law, in the bidding notice or the respective contractual instruments;
 - Manipulate or defraud the economic-financial balance of contracts executed with the government.

6. POLITICAL CONTRIBUTIONS AND SOCIAL DONATIONS

The Companies do not engage in political-party activities and do not make political contributions, whether to candidates, political parties, party representatives, or related campaigns nor do they authorize their employees to do so on their behalf.

The Companies do not contribute, directly or indirectly, whether through donations or loans of assets, use or assignment of physical or advertising space, event sponsorship, provision of labor and/or any other resource, leafleting, sending electronic messages, posting posters, or in any

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other way, to political campaigns, political parties, candidates for public office, or any other type of political organization.

Exceptions, if any, will only be allowed and implemented following due evaluations and approvals, always respecting the legislation in force, especially Law 12,846/2013.

Social donations to communities or charitable institutions should be made without payment to the Government Authority or a third party related to it, always observing the internal and external applicable regulations.

Social responsibility donations and sponsorships should be made transparently, be previously documented, approved, and be made only for legitimate reasons related to the purpose of the donation and sponsorship, such as serving humanitarian interests, supporting cultural and educational institutions, and seeking brand appreciation and knowledge. The Companies only sponsor projects after these evaluations and approvals are conducted, following guidelines established in internal regulations, thus, contributions of donations and sponsorships will be made with the highest standard of integrity.

Donations and sponsorships offered, promised, or granted to obtain undue advantage or influence the action of a government authority are prohibited.

Accordingly, to check the integrity and legality of the organization to be benefited, whether through donation or sponsorship, integrity research will be conducted to obtain information such as a history of involvement in corruption cases, fraud, whether they have administrators who are government agents or politically exposed persons, among others. The Companies respect the participation of their employees in Political activities provided that they are always on a personal basis, outside of working hours, and in compliance with the guidelines of the Code of Ethics and Conduct.

Although donations from individuals are not prohibited in law, it is not recommended for all those who hold statutory positions at the Company to refrain from making personal donations to electoral campaigns, including to those who are part of their circle of economic dependence.

7. CANDIDACY FOR POLITICAL OFFICES

Professionals running for political offices must step away from their activities in the Company, without the right to compensation, during the period between the registration of their candidacy with the Electoral Court and the day after the election.

8. BIDDING PROCESS

If the Companies participate in public bids, they will be subject to and comply with the legal provisions of the Bidding Laws (Law 8,666/13), the Anti-Corruption Law, bidding rules, and contractual clauses executed with the bidding public body.

9. RELATIONSHIP WITH PUBLIC AGENTS/GOVERNMENT AUTHORITY

Except for the processes outlined in item 8, the hiring of Government Authorities is expressly prohibited for all companies in the Prudential Conglomerate, except in cases previously approved in writing by the President's Office and/or Corporate Governance Committee. In such cases, a

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Due Diligence process must be conducted to check the integrity of the company, as well as its partners, including checking whether the partners are or have been:

- Government Authorities or former Government Authorities;
- Relatives of Government Authorities (or former Government Authorities);
- Entities in which a Government Authority (or former Government Authority) has substantial investments or other financial interests; or
- Participated in acts of Corruption or acts contrary to the rules of the Companies.

10. ASSISTANCE PROVIDED TO GOVERNMENT AUTHORITIES

It must always be led by the Companies' legal department, according to the work policy available on the intranet.

It is strictly prohibited to offer undue or pecuniary advantages or to comply with requests to influence the results of any inspection action, obtain personal or professional advantages, or any other conduct that deviates from the professional duties of the employee, which must be strictly carried out according to their employment contract and the Companies' policies.

11. TRAINING AND AWARENESS

All employees must periodically complete the online anti-corruption training available on the UniUOL platform, as part of mandatory courses, with an annual validity, aiming at content recycling and knowledge retention.

The Companies will maintain a periodic and constant communication and training plan for their employees to disseminate and raise awareness about the importance of complying with the rules of this Policy and the Anti-Corruption Law. It is the responsibility of all Leaders of the Companies to disseminate the content of this Policy to their subordinates and raise awareness about the need for and importance of compliance, encouraging them to present doubts or concerns regarding its application.

12. REPORTING

12.1. Employees

Employees of the Companies who suspect or verify disobedience to this Policy or any law related to the matter, whether by a professional or third party, must report via the whistleblowing channel, through the email canaldedenuncias@uolinc.com, following the rules described on the matter, as outlined on the Code of Ethics and Conduct under the responsibility of the Human Resources department.

The Companies guarantee the confidentiality of the information subject to the report, undertaking to carry out the necessary investigation. The Companies will not allow any type of retaliation against the whistleblower who, in good faith, suspected misconduct.

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12.2. Clients, suppliers, and the general public

For reports not related to the professionals of the Companies, a Service Channel is provided through the exclusive phone number +55 11 3004-4770. Furthermore, the public is guided on how to report Fraud, through the PagBank website at the following link: <https://faq.pagbank.uol.com.br/duvida/como-denunciar-um-golpe-ou-uma-fraude/1097#rmcl>.

13. SANCTIONS

The violation of the guidelines of this policy is considered an infraction whose nature and severity may imply disciplinary measures, without prejudice to those provided for by law, such as:

- Formal written warning;
- Suspension;
- Dismissal for cause, in cases provided for in current legislation;
- Exclusion of the supplier, partner, or intermediary agent;
- Appropriate legal action.

Infractions will be analyzed by the immediate manager and the Compliance and Regulatory departments.

Any disciplinary measures will be discussed and validated with the Human Resources and Legal departments of the Companies.

14. INFORMATION CLASSIFICATION

According to the Information Classification Policy, this Policy is classified as Internal Information.

15. QUESTIONS

Doubts about this Policy should be submitted to the following departments:

Compliance: compliancepagseguro@uolinc.com

Regulatory: regulatorio@uolinc.com

16. MISCELLANEOUS

This Policy was approved by the Company's Executive Board at the meeting held on October 18, 2023.

17. VERSION CONTROL

Review	Changes	Date
00	Initial issue Compliance and Regulatory Legal	October/2023

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