

COMPLAINT HANDLING POLICY

Permanent policy established by FacilitaPay's Legal Team for the handling and regulation of the whistleblowing channel.

PRINCIPLES AND OBJECTIVES

In view of the implementation of basilar principles to FacilitaPay, which are: ethics, integrity, transparency, solidarity, human dignity, the dignity of work, respect for diversity and minorities, intellectual property, image, contribution to society and the community in economic and social development, FacilitaPay has developed this policy to establish guidelines for the reception, investigation and treatment of complaints received through the reporting channels.

This Policy applies to all FacilitaPay employees, service providers, suppliers and third parties who have any type of relationship with FacilitaPay.

All employees of FacilitaPay have the duty to immediately report to the Compliance area through the reporting channel any violation or suspected violation of the Code of Ethical Conduct, or the Anti-Corruption Policy of FacilitaPay.

DEFINITIONS

In this policy, it is considered:

Complaint: Report regarding illegal or immoral practices or violating principles, policies, or legal obligations of FacilitaPay committed by employees, suppliers / customers or any other person related to FacilitaPay.

Reported: Any person, natural or legal, if an employee of FacilitaPay ou terceiro, on which the complaint is made.

WHISTLEBLOWING CHANNEL

The reporting channel receives reports of any and all conduct in violation of the Code of Conduct, internal policies, as well as the laws, policies, and legal obligations applicable



to FacilitaPay. The communication may be made free of charge, in an identified or anonymous manner.

FacilitaPay undertakes to keep the reporting channel effective at all times, as well as ensures that all complaints will be properly handled.

Anyone who, in case of doubt of if there has been a violation of any of our policies, related to the incidence or not of any prohibition of conduct can contact the Compliance area through the channels below:

Contact e-mail: legal@facilitapay.com

Form on our website – anonymous filling is available, without identifying yourself:

<https://forms.gle/q7XyEBWU8SwhLJ9J9>

Complaints should be based on facts, not assumptions. It is also required that the case be reported in detail so that the compliance team can assess the nature, extent and urgency of the case, as well as conduct the investigation properly.

The instructions in the form indicate the possibility of making the report in a completely anonymized form, including directing to procedures describing how to send files related to evidence of the complaint also anonymously (via disposable email provider).

RECEIPT AND INVESTIGATION OF COMPLAINTS

FacilitaPay is committed to the investigation, investigation and proper referral of reported cases of any nature, especially related to corruption, illicit, unethical or illegal.

All complaints will be received by FacilitaPay's Compliance team, the area responsible for investigating the reports sent by the reporting board, having instructive and decision-making powers regarding the occurrence of illegal and/or unethical conduct.

As soon as the complaint is received, it is analyzed whether the report involves any member of the Commission. If so, the latter will not receive the communication about the complaint and will not participate in the investigation process.

It is then evaluated whether the report is related to the scope of the whistleblowing channel. Conduct that does not concern or is irrelevant to FacilitaPay's policies, code of conduct, and legal obligations will be archived.

The third stage consists of an analysis of the evidence contained in the complaint, in order to verify if there are minimum elements for initiating an investigation or if the complaint is based on assumptions. The complaint must be made in detail containing, by way of example, the conduct, the day, place, time, possible witnesses, copies of documents, photographs, messages and emails.

If the Compliance team does not consider the complaint sufficiently detailed, additional information will be requested from the whistleblower by the email informed in the form and, if after 15 (fifteen) business days we do not obtain answers that allow us to conduct an investigation, the complaint will be filed. The filing of any complaints will always be done in a reasoned manner.

The fourth and final step in receiving the complaint consists of preparing a report describing the conduct, all the circumstances and evidence of the complaint existing up to the time of the report. Provisions violated by FacilitaPay's policies and/or its Code of Conduct, as well as legal provisions infringed, must also be indicated.

INVESTIGATION

Upon receipt and initial analysis of the complaints, the investigation begins. This step is also done by FacilitaPay's Compliance team and aims to verify the veracity of the complaint. At this stage, witnesses will be questioned, if indicated in the complaint, as well as fact-checking. Throughout this process, the accused will be aware of the conduct for which he is being investigated, having access to the report made by the Compliance team on the initial analysis of the complaint, being opportunized the ample defense of the accused.

It should be noted that under no circumstances will documents be made available to the accused that allow the identification of the whistleblower.

ANALYSIS AND PENALTIES

All acts performed by the Compliance team regarding the stages of the treatment of complaints will be documented. The same document should contain the investigations, the evidence carried out and its results, as well as the final analysis of the Compliance team. This final analysis includes weighing the penalty to be applied, which will always be proportional to the conduct reported, or filing the complaint.

The following penalties shall be imposed on the accused or the whistleblower in bad faith, in the order according to the seriousness of the conduct:

- (a) notification;
- (b) warning;
- (c) suspension;
- d) Judicial liability of a civil or criminal nature;
- e) Termination of contract, with or without cause.

The Compliance area will always forward to the directors of FacilitaPay its decision for analysis and compliance.

NON-RETALIATION AGAINST WHISTLEBLOWERS

Any person who, acting in good faith, has made a complaint or testified in an investigation, will be guaranteed confidentiality and will have protection against discrimination or retaliation.

Therefore, people who suffer any form of retaliation or have questions about it, should contact the Compliance area, or make a report through the Whistleblowing Channel.

Cases of retaliation complaints, as they are also considered a violation of FacilitaPay's Code of Conduct, will be analyzed, going through the same process as the other complaints received by the reporting channel. The perpetrator of the retaliation is also subject to sanctions in the form of this policy and applicable law.

This non-retaliation protection does not apply to bad faith whistleblowers who intentionally made false reports. In this case, the penalties provided for in this policy may apply.



DOCUMENT RETENTION

The Compliance area shall keep a record of all complaints, with all acts/document/measures adopted documented. These records will be kept for three (3) years from the close of the investigation, unless otherwise provided by applicable law.

UPDATE

We may, from time to time, make changes to this Policy. Eachtime this Privacy Policy is changed, these changes will be valid, effective and binding after the new version is disclosed on the FacilitaPay website.

Last updated: May 3rd, 2023.