

CODE OF ETHICS

BRISANET GROUP

2021

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1. MESSAGE FROM THE PRESIDENT

Brisanet Telecommunications, as well as the entire Group and its subsidiaries, has always been recognized for being a company that believes in people and their capacity for development. Looking back on our history, we realize how much we have grown: from a small radio provider in the semi-arid region of Ceará to a telecom company that brought connectivity to thousands of people in the Northeast of Brazil. If there were no ethics guiding our steps, we would not have come this far, leading us to reach the level of one of the most important companies in the national telecommunications market.

The credibility of our institution is a reflection of the effective practice of our values, integrity, honesty, transparency, quality and efficiency of our services and respect for customers. **An ethical conduct** is essential and the responsibility of each one of us, when performing our duties with the internal and external public; therefore, the rules contained in this document represent a basic premise for the Brisanet Group.

The **Code of Ethics** ("**Code**") is an instrument that synthesizes our corporate culture, vision, mission and values. By following these guidelines on a daily basis, we will contribute to a work environment that fosters productive quality, compliance with the law, customer satisfaction and, consequently, the achievement of the purposes of the entire organization.

2. INTRODUCTION

The purpose of this Code is to make explicit the rules and guidelines for ethical behavior that should guide all employees (regardless of position held or function performed, including interns, permanent and temporary employees, members of the Board and Executive Board) of the Brisanet Group, *Brisanet Participações S.A.* and its subsidiaries and controlled companies, including Agility Telecommunications, as well as all third-party service providers, franchisees, suppliers and other business partners ("**Third Parties**"), in the various ways they interact with the environment that surrounds them in their work and relationships.

3. WHO IS THIS CODE FOR?

It's extremely important that all employees and Third Parties adopt and comply with these principles and values.

The company's success depends on compliance with the standards established in this document. This Code applies to all employees, regardless of position and rank, as well as all Third Parties (Stakeholders, Communities where we operate, Financial Institutions, suppliers of goods and services; Public Sector Agencies in all spheres - Municipal, State and Federal-, Granting Authority - Federal Government, State Governments and Regulatory Agencies-, and Non-Governmental Organizations; Companies associated through joint ventures and consortiums; Shareholders and investors; Competitors and Media) related to the Brisanet Group.

The Brisanet Group encourages all employees and Third Parties to immediately report, through its ethics channel ("**Ethics Channel**"), any violations or suspected violations of this Code of Ethics, other Brisanet Group policies, or the Law.

You are an important member of this community and your support is fundamental to our success.

4. OUR PRINCIPLES AND VALUES

- Pillars



BELIEF - A better future is achieved through dreams, dedication, passion and connection with people.



MISSION - To have a positive impact on humankind, disseminating knowledge that promotes social and technological inclusion.



VISION - Become the most desired brand and the one with the largest number of people connected in the Northeast.

- Values



Innovation:
Motivate yourself by bringing the future into the present.



Perception:
Get to know, understand, and serve customers.



People:
Care and believe in people, in their capacity for development and accomplishment.



Commitment:
Be responsible for providing the best service.



Cooperation:
Develop team spirit in order to achieve our goals.



Simplicity:
Be accessible and clear in our relationships.



Trust:
Have both good character and competence.



Perseverance:
Focus on our mission.



Work:
Believe in work as a philosophy of life.

5. WHAT DOES THE BRISANET GROUP EXPECT FROM YOU?

An ethical environment exists when all parties are committed to this standard. Therefore, everyone who is part of the Brisanet Group, regardless of hierarchical level, should be aware of and abide by this Code, in all relationships, professional activities, and situations involving our company.

Furthermore, the leaders are responsible for fostering ethical behavior, encouraging open communications that convey commitment to this document. In order to promote awareness of and compliance with the guidelines contained in this Code, everyone must sign the Receipt and Liability Notice at the end of this document.



- Compliance with laws, regulations and internal rules

The Brisanet Group is committed to conducting business with ethics, transparency, integrity, and in full compliance with all applicable laws, rules, and regulations.

All employees and Third Parties must know and comply with the laws, rules and regulations applicable to the sectors in which they operate, including general rules and those which may imply responsibility for the acts of its subordinates or Third Parties.

- Respect for all individuals

The Brisanet Group has a DNA of inclusion and appreciation of diversity, recognizing the unique side of each individual. The Brisanet Group believes that diversity is the sum of differences in culture, origin, ideas, ethnicity, religion, sexual orientation, economic class, gender and educational background.

Under this belief, the Company forbids all sorts of discrimination and disrespect, as well as repudiates the exploitation of labor, whether slave, slave-like, or child labor, and ensures that all individuals who interact with us respect human rights.

The following practices are not tolerated in the workplace environment, and in case any of them happen, everyone is encouraged to report such behaviors to the Ethics Channel for due investigation and accountability of its practitioners:

- Moral and Sexual Harassment:

What is Moral and Sexual Harassment?

Moral harassment is characterized by exposure to humiliating, embarrassing and repetitive situations.

Sexual harassment is understood as coercing someone with the objective of obtaining sexual favor through solicitations, insinuations, or any manifestation of such.

- Physical or verbal aggression;

- Do not address colleagues, superiors or subordinates with bad language or prejudiced acts of any nature;

Positive examples of conduct expected from employees and Third Parties are:

- Treat all employees politely and courteously;

- Consider the employee's performance, deliveries and accomplishments, and not personal characteristics, for the purpose of promotion;

- Occupational Health and Safety

Safety is a priority for the Brisanet Group. All employees and Third Parties must respect the legislation, policies and internal programs of the Brisanet Group about health and safety at all times.

Therefore, this document establishes, both for the Brisanet Group, its employees and Third Parties, the following commitments:

- To ensure a safe working environment by providing training, protective equipment, both individual and collective, and other tools necessary to maintain health and safety and to take all necessary measures to prevent or minimize occupational risks.
- Do not drink alcoholic beverages while working. It is also strictly forbidden to come to work under the influence of alcohol or any other type of narcotic or stimulant drug, as well as to possess, transport or sell these substances during working hours or use company valuables to carry out such activities.
- Comply with all civil security regulations and instruct employees on how to respond to emergency situations.
- Undertake all health and safety training provided by the Company, whether legal/mandatory or refresher training.

- Proper use of the Company's resources

We are all responsible for preserving and caring for the resources and work tools that are entrusted to us.

Thus, one must take the greatest possible care of such assets, which can be financial, material, intellectual, furniture, equipment, or infrastructure. We should also keep the working environment clean and organized, avoiding wastes and unnecessary expenses.

Your corporate e-mail account is also an asset of the Brisanet Group, so it must be used exclusively for the job and is subject to inspection and audit.

No one is allowed to use resources of the Brisanet Group to access content that is

pornographic, obscene, offensive, or that disrespects the privacy or intimacy of others.

Examples of assets and resources that are property of the Brisanet Group, which are the responsibility and usage of all who use them:

- Stationery, office supplies (paper, pens, tables, cabinets);
- Landline phones, cell phones, computers, notebooks, printers;
- E-mails;
- Access to the internet;
- Vehicles (cars, minibuses);
- Intellectual Property, such as the Company's name and trademark.

- Proper use of Social Media

Social networks are a reality in today's world. However, we must use these communication channels in an ethical and responsible way.

The disclosure of official information on behalf of the Brisanet Group and its relationship with external communication agencies are exclusively the responsibility of the Communication Management, being forbidden for any employee to express an opinion, make contact, or send verbal and/or written information to the media on behalf of the Company.

Employees must always speak on their own behalf, and not on behalf of the Brisanet Group. Moreover, although they are expressing themselves in their own name, possible references to the company in the profiles could be interpreted as the opinion of the Brisanet Group, affecting the company's image and reputation.

For this reason, one must always be attentive to the guidelines of this Code, even in the external environment, and any kind of discrimination, prejudice or unethical conduct will not be tolerated.

Nor is it necessary to respond to comments to the detriment of the Brisanet Group or made by competitors on social networks. Whenever there are doubts, one should contact the Marketing Management for further clarification on how to act in the social networks and consult the Policy for Social Media Use.

If you do not know how to proceed, or if you notice any inappropriate behavior on social networks that may harm the company's image, communicate it immediately through the Ethics Channel or to the Compliance Area.

- Innovation and Intellectual Property

The Company stimulates the development of new ideas and the contribution of employees to the improvement of internal processes. When developed in the performance of their duties, this information and content become the property of the Brisanet Group.

Intellectual property refers to intellectual creations, such as patents, trademarks, trade secrets, inventions or processes.

It is the responsibility of everyone involved to protect and enforce the intellectual property rights of the Brisanet Group.

6. HOW TO HANDLE INFORMATION

- Confidential Information and Secrecy Duty

The employees have day-to-day contact with various confidential information, be it commercial, strategic, financial, personal or of another nature, due to the position they hold or the activity they perform.

Since they are important to the success of our business, the information should not be shared with the external public, such as family members, competitors, Third Parties, and many times not even with other employees of the Group.

That's the reason you must be responsible about the use and safekeeping of the information entrusted to you by the company.

- Data Protection and Information Security

The Brisanet Group believes it is essential to implement measures to safeguard its operations related to Information Security as well as to protect the fundamental rights of freedom and privacy of each user. Therefore, pursuant to the Law nº 13.709/18 - *Lei Geral de Proteção de Dados* (LGPD), similar to the European General Data Protection Regulation (GDPR)–, employees must take all necessary measures to

ensure that personal data is accessed and/or processed only by people who need this information to perform their tasks, and that only data strictly necessary to the performance of their activities is collected, especially in relation to data classified as sensitive by LGPD.

What are personal data?

It is information that allows identifying, directly or indirectly, an individual who is alive, so they are considered personal data: name, ID, CPF, gender, date and place of birth, phone number, home address, location via GPS, photograph, health records, bank card, income, payment history, consumption habits, leisure preferences; Internet Protocol (IP) address and cookies, among others.

What are sensitive personal data?

Within the set of personal data, there are still those that require a little more attention: these are those about children and adolescents; and the "sensitive" ones, which are those revealing racial or ethnic origin, religious or philosophical convictions, political opinions, union membership, genetic issues, biometrics, and about a person's health or sex life.

- Books, Records and Reports

All books, records and accounts should show transactions and events in accordance with generally accepted accounting principles, applicable internal methodologies, and the internal control framework. It is prohibited to coerce, manipulate or mislead any internal or external party involved in auditing, inspection work and any other form of administrative, regulatory or judicial inspection.

7. CONFLICTS OF INTEREST

It is the duty of all employees and Third Parties to act with integrity and avoid potential, real or apparent conflicts of interest in their personal and professional relationships in the conduct of their activities inside and outside the Brisanet Group. If you feel you are facing a situation of conflict of interest, the ideal is to communicate directly to your manager, report to the Compliance Area or through the Ethics Channel any situations of conflict of interest, whether evident or suspicious, so that

they can be verified.

What are conflicts of interest?

Conflicts of interest may occur when a particular interest of an employee interferes in any way, or appears to interfere, with the interests of the Brisanet Group, making it difficult or impossible for the employee to perform his or her work in the best interests of the company as a whole.

They may also arise when an employee or a member of his/her family or friend receives undue personal advantages as a result of his/her position as an employee of the Brisanet Group.

Examples of behavior that may represent a conflict of interest:*

- Work for the Brisanet Group and for any of its competitors, clients or Third Parties at the same time;
- Take advantage of any form of business opportunity by means of information obtained through or by reason of one's office or position, or engage in activities or invest in companies that compete with the Brisanet Group in any way;
- A report or personal judgement intended to harm other employees or partners;
- Grant or favor business opportunities for personal or third-party gains;
- Receive or offer goods, property, money or any other benefits with financial gains to suppliers or companies that have any involvement with the Brisanet Group;
- Hold business relationships, as representatives of the company, with companies in which you or people of your personal relation have interest or participation, directly or indirectly;

- Family and Affective Relationships

The Brisanet Group allows first-degree relatives and spouses to work for the Company, but it is not allowed to hire or keep first-degree relatives, who are father, mother and children, as well as spouses (husband and wife) or partners in positions where there is a direct hierarchical relationship.

When indicating a relative, regardless of the degree of kinship, spouse or partner to work for the Brisanet Group, you must inform this relationship to your manager or the

* For further information, consult the [Policy on Transactions with Related Parties and other situations involving Conflict of Interest](#) and the [Policy on Disclosure of Material Act or Fact](#).

Attraction and Selection area.

In case a situation of close relationship is established between employees who have, among themselves, direct hierarchical subordination, the situation must be communicated to the immediate superior or to the Personnel Management Department, so that the conflict situation can be eliminated through internal transfer.

- Gifts, Souvenirs, Entertainment and Travel Invitations

One must abstain from situations that may interfere in decisions or cause discredit due to the receipt of courtesies, gifts, gratifications, and discounts.

One should not accept nor offer favors, money or personal gifts which may influence decisions, facilitate business deals or benefit Third Parties.

It is prohibited to suggest or accept participations, commissions or any other form of remuneration or cash payment related to any transaction or business involving the company.

The employees are strictly forbidden to take trips, commercial or leisure, paid or sponsored by Third Parties.

It is allowed to accept gifts that have no commercial value and are distributed as a courtesy, advertising, on special events or commemorative dates.

Example of allowed gifts: Agendas, Pens, Calendars, Samples, Items with the company logo.

Presents and gifts received in excess of R\$ 200, 00 (two hundred reais) must be immediately returned to the sender, along with the standard letter of thanks and return available in the Compliance Area. If the gift or present cannot be returned or is refused, the company will donate it to charity. Presents in cash must not be accepted under any circumstances.

- Acceptance of equipment for testing

Equipment for testing, such as cell phones, technology inputs, among others, can only be received if there is relevant interest on the part of the Brisanet Group, with the authorization and approval of the Board of Directors responsible for the project.

After the end of the test and demo period, the equipment should be forwarded to

the Compliance Area for final destination

- Events sponsored by Third Parties

In case an employee is invited to participate in an event with professional purposes sponsored by Third Parties (clients, suppliers, partners, etc.), the following rules must be followed:

- Whenever possible, the costs will be fully covered by the Bris Janet Group, in which case it will bear the expenses of its employee.
- When the invitation is not intended for a specific person, the manager of the area that received the invitation will decide which employee will participate in the event, submitting this approval to the respective Director, always considering the advantages of such participation for the business.
- When the invitation is intended for a specific person, the manager of the area that received the invitation will decide if the employee can participate in the event, submitting this approval to the respective Director with the support of the OHD (Organizational Human Development) team, which will also verify the importance of such participation for the development of the employee and the Bris Janet Group.

- Business Meals

Business meals can be held, as long as they are properly accounted for to the manager with justification of expenses. Besides, it is important to highlight that those expenses must be incurred in such a way that they do not generate any type of undue favoritism, direct or indirect.

Business meals with public servants, people who hold public positions, or who have direct or indirect relationship with public administration bodies, autarchies, parastatal entities, should be preferably avoided, but, in case they occur, it is recommended that each party should pay for its own expenses.

If any of the hypotheses above cannot be fulfilled, for any reason whatsoever, the employee must immediately report the fact to the Compliance Area, which will analyze the case in question and address any necessary measures in order to avoid any conflict of interest.

8. RELATIONSHIPS

- Internal Public

The Brisanet Group values ethics in all its relationships, so it will always ensure respect between the parties and honesty in the interactions carried out.

It is our value to take care of people, so the initial and most important link is made with the internal public, composed of all employees who are part of the Brisanet Group.

The Brisanet Group is committed to ensuring the health, welfare, and safety of people in their working environment, always seeking to promote quality of life.

Likewise, it is the commitment of everyone who is part of the Brisanet Group to act ethically and in compliance with this Code, laws and internal regulations, always acting with courtesy and making our workplace a pleasant environment for growth.

- Clients

The purpose of the Brisanet Group is the relentless pursuit of customer satisfaction.

The Brisanet Group focuses on offering quality services and products, always trying to provide the consumer with offers tailored to their needs, seeking their loyalty through clear information about the products, for the safety of all those who seek its services.

- Suppliers*

The Brisanet Group bases its relationship with its suppliers on mutual respect, absence of conflicts of interest, transparency and honesty in its operations.

It is also expected that suppliers behave ethically in all spheres and that they honor all their obligations, especially those related to legal, tax, labor, social and environmental issues, health and safety at work, respect for human rights (such as not performing slave or child labor practices), nor take advantage of acts of corruption and fraud.

You should only hire suppliers that share the same values as those of the Brisanet Group.

*For further information, consult the Anticorruption Policy and the Policy on Transactions with Related Parties and other situations involving Conflict of Interests.

- Franchisees

The relations between the Brisanet Group and its franchisees must be ethical, transparent and respectful in order to avoid conflicts.

The franchisees are guaranteed an isonomic and fair treatment, as well as a clear and objective communication of the information transmitted.

The franchisees must:

- Respect and comply with this Code and the conditions of the franchising agreements;
- Conduct business with integrity and comply with its obligations, mainly related to legal, tax, labor, social-environmental, occupational health and safety issues, respect for human rights (such as not engaging in slave or child labor practices), and refrain from acts of corruption and fraud.
- Keep confidentiality and secrecy about the data they receive about the Brisanet Group.

- Competitors

The Group values fair and loyal competition respecting the products and services of the competitors.

Thus, offensive comments about competitors, in any media, and unduly affecting a competitor's brand reputation are not allowed.

Likewise, discussions or sharing of internal and confidential matters and information with our competitors, or obtaining information from competitors through suspicious or unfair methods, are not allowed in the Brisanet Group.

- Public Entities*

The relationships with public entities are based on compliance with the applicable laws in each area in which the Brisanet Group operates.

The Brisanet Group is committed to being collaborative in inspections and other administrative and regulatory acts, submitting the documents requested by public authorities.

As best practices, the Brisanet Group will not allow the granting of privileges to public agents by means of gifts, promises, privileges or personal advantages, even if they are intended to benefit the company, whether to speed up procedures or to

* For further information, consult the [Anticorruption Policy](#).

exempt them from legal obligations.

- Shareholders

The relationship with shareholders is based on the best corporate governance practices, with equal treatment, regardless of the amount of shares they possess.

The Brisanet Group is committed to providing the necessary information to allow the monitoring of its performance with agility, veracity and promptness, as well as ensuring the confidentiality of information that is not of public knowledge or that may influence market movements or investment decisions.

- Natural environment

The Brisanet Group is committed to the environmental preservation and socio-cultural appreciation, contributing directly to the sustainable development of the region.

Thus, in addition to seeking compliance with environmental legislation, the Brisanet Group acts in an attempt to identify, eliminate, control or mitigate the risks of its business associated with the environment, as well as promoting actions to prevent environmental pollution.

- Communities

The Brisanet Group is present in several communities with strong regional and cultural values, some of them distant from large urban centers. By means of its line of business, it always acts in a way to contribute to the improvement of the living conditions, digital inclusion and sustainable development of these communities.

The Brisanet Group engages in promoting actions associated with transformation strategies and social development, respecting the welfare of the population in the places where it operates.

9. PROHIBITION OF CORRUPTION AND FRAUD PRACTICES

The Brisanet Group seeks to be in compliance with the anti-corruption legislation where we operate, as well as with other legislations from countries where we do business. We prohibit any and all forms of corruption, fraud, bribery, favoritism, extortion, reward or kickback in all our relationships or during any of our negotiations.

Attention!

Corruption is not necessarily related to money! Job requests or offers, gifts, privileged information, or any advantage can also be considered corruption practices.

In other words, the employee cannot offer, give or promise, either directly or indirectly, any undue advantage to public servants or even representatives of the private sector in exchange for benefits to the Company or to any other person.

Likewise, the Brisanet Group cannot receive any improper advantage, accept any promise of payment or reward from any public servant or representative of the private sector, as well as from any Third Party with whom it has a relationship.*

10. PROHIBITION OF MONEY LAUNDERING

The Brisanet Group is committed to the efforts of preventing and combating the crimes of money laundering and financing of terrorism, complying with the legal requirements and those provided for in the regulations of the supervisory and regulatory authorities.

What is “Money Laundering”?

Money laundering is the practice of disguising or concealing the ownership or source of illegally obtained funds through transactions to "clean" these funds to make them appear to be coming from legal activities.

The Brisanet Group is also committed to checking its potential clients, customers, and Third Parties to ensure that their products and services cannot be used to facilitate money laundering or terrorist activity.

11. DONATIONS AND SPONSORSHIPS

Donations to Charities and Sponsorships

The Brisanet Group allows and supports charitable donations when they are not made with the purpose of obtaining or retaining any improper advantage or favor, and are made to reputable charities, after prior review and analysis of the public information of the charity and related persons.

* For further information, consult the [Anticorruption Policy](#).



Sponsorships are monetary contributions to an action organized by a third party for the purpose of advertising or publicizing the Brisanet brand.

Employees responsible for contributions that are of a sponsorship nature must ensure that such activities are transparent, conducted under a written contract and for legitimate business purposes.

The donations or sponsorships must always observe the internal flows and policies for approval, payments and accounting, and must be previously approved by the Executive Directors of the Brisanet Group.

Prohibition of political donations*

Employees are prohibited from making donations to political parties or candidates running for public office on behalf of the Brisanet Group.

12. MANAGING ETHICS

Code Enforcement and Training

All employees should participate in periodic training regarding the need to comply with the provisions of this Code and other Brisanet Group policies.

The role of managers is essential to ensure the enforcement of the values, principles and rules established in this Code, both inside and outside the workplace, because leaders should be examples of ethical conduct and good practices to be followed by their teams.

Ethics Channel

Any violation or suspected violation of this Code, of any of Brisanet Group's policies and rules, or of the current legislation, committed by an employee or third party must be promptly reported through the Ethics Channel.

The Brisanet Group will take all reasonable and justified measures to protect the confidentiality of complainants and will not retaliate in any way for you reporting a complaint.

*For further information, consult the [Policy about Donations and Sponsorships](#)

Access to the Ethics Channel is independent, confidential, impartial and free of charge. The complaints will ensure the anonymity and non-retaliation of the complainant, and can be made through the following means:

- e-mail: brisanet@canaldeetica.com.br

- phone: [0800 591 8826](tel:08005918826)

- access through the Ethics Channel link on the Brisanet Group's website:
www.canaldeetica.com.br/brisanet

Ethics Committee

The Ethics Committee will be formed by the Brisanet Group's People Committee, Legal Management and the Presidency and is directly subordinated to the Board of Directors. Its principles are to act impartially to ensure compliance and updating of this document. It is also the committee's responsibility to welcome and clarify doubts, analyze and deal with complaints in the last instance, as well as to deal with critical cases that directly impact the Company's future.

Violations and Penalties

Employees who violate any provisions of this Code, other Brisanet Group policies, or the Brazilian legislation, depending on the severity of the offense committed, may be subject to the following sanctions (in addition to any consequences arising from reporting to the competent authorities if the act in question constitutes a crime under applicable law):

- warning (oral or written),

- suspension, or

- dismissal with or without due cause.

Any questions or complaints about ethical violations of laws, rules, regulations, policies or of this Code by any employee, regardless of his or her hierarchical position, must be reported to the Ethics Channel.

Anonymous complaints will be received through the Ethics Channel and handled by the Compliance Area, which is independent and reports directly to the Board of Directors.

13. EFFECTIVE DATE

This edition is effective as of this date and revokes any and all provisions to the contrary. All employees must confirm knowledge and understanding of the Code of Ethics and its revisions via the "Letter of Receipt and Commitment".

14. LETTER OF COMMITMENT

LETTER OF RECEIPT AND COMMITMENT

I hereby declare that I have received, read and understood the Brisanet Group's Code of Ethics and am aware of the established conduct and sanctions and their importance for me and for the company.

I agree to comply with it in full, being subject to the applicable sanctions, including disciplinary punishments and termination measures, in the employment contract and in the applicable legislation.

Name: _____

Date: ____/____/____

Signature: _____