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1. OBJECTIVE

This Anticorruption policy aims to establish the main guidelines and position of the Bris Janet Group as to repudiate and combat all forms of corrupt conduct such as bribery, embezzlement, and the granting of undue advantages, as well as the concealment or disguise of these acts and the hindering of investigation and inspection activities.

2. SCOPE

It applies to all employees of the Bris Janet Group, including its workers, interns, directors, executives and members of committees and boards, as well as suppliers of goods and services to all companies in the Bris Janet Group, commercial partners and business partners in Brazil, and all those who act on its behalf

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3. ABBREVIATIONS

POL - Policy


4. DEFINITIONS

To fully understand this policy, some terms must be understood. These terms are:

Government: Set of agencies and entities that perform the management and execution of public business or services, through public employees, in the federal, state and municipal spheres.

Government Agent: It is every natural person who represents the public power, being a public employee or not, paid or unpaid, exercising temporary or permanent service. It is anyone who exercises, even if temporarily or without remuneration, by election, appointment, designation, contracting or any other form of investiture or linkage, a mandate, post, job or public function. The person who works for a private company

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hired or contracted for the execution of activities that are typical of the Government is equivalent to a Government Agent.

Anticorruption Clause: A mandatory clause in all contracts entered into between the Brisagnet Group and its suppliers, service providers or third party intermediaries, in which the parties declare their knowledge of the Brazilian Anticorruption Law and undertake to fully comply with its provisions, by abstaining from any activity that constitutes or may constitute a violation of the law.


Worker: This includes, individually or jointly, any and all employees, trainees, directors, officers or board members who act on behalf of the Brisagnet Group in any way.

Compliance: It is the department responsible for checking and verifying the application and compliance of the legislation, the Code of Ethics and the policies and norms related to the Company's business and activities.

Ethics Channel: This is the channel made available by the Brisagnet Group for stakeholders and any third parties to anonymously or identifiably report or provide information on conduct they consider contrary or potentially offensive to the Company's values or to the legislation in force, including the Anticorruption Law.

Corruption: The act of paying, promising to give or offering something to someone or using influence to obtain an advantage for oneself or for an organization to which one belongs, even if the offer is not accepted. The most popular form is the payment of bribes, but it can also happen through gifts, trips, offering and/or receiving entertainment, among other conducts. Although the technical concepts of corruption or wrongdoing are linked to practices involving public agencies, this policy deals with guidelines and standards of conduct applicable to dealing with any entity, whether public or private. The distinction is made because of the provisions of the enacted law, which makes specific reference to government agencies and public officials, both Brazilian and foreign. In Brazil, corruption is a crime, as defined in the Penal Code. Moreover, the Anticorruption Law brings extremely harsh penalties to companies whose employees commit acts of corruption in the administrative and civil spheres, such as fines, restriction of activities and publication of the penalties imposed, bringing to light not only the legal risk, but also the risk to reputation.

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Fraud: It is the crime or offense of deliberately deceiving others with the intent to harm them, usually to obtain property or services from him or her unfairly. It is any cunning, deceptive, bad faith act with the intent to harm or deceive others, or to not fulfill a certain duty, obtaining for oneself or others undue advantages or benefits (pecuniary or not).

Government employee: any person who occupies a government post or function, even if temporarily or without remuneration, including a post or function in public companies or mixed economy companies; any person who acts for or on behalf of a political party; a foreign government employee is anyone who holds a public post, job or function in state entities or in diplomatic representations of a foreign country, even if temporarily or without remuneration. Public international organizations are equated with foreign government employees; the definition extends to immediate relatives (spouse, parents, children and/or siblings) of the government employee.

Stakeholders: term used to describe the strategic group and all the people or "interest group" that is impacted by the actions of a venture, project, company or business.

Bribery or Kickback: It is the means by which Corruption is practiced, as it is the practice of promising, offering or paying an authority, ruler, Government Agent or private professional any amount of money or any other favors (from a bottle of booze, jewelry, property or even a hotel stay and airplane ticket on a vacation trip) so that the person in question will cease to behave ethically with his professional duties.


Third Parties: any person, whether natural or legal, acting on behalf of, in the interest of, or for the benefit of the Brisanet Group, or providing services or other goods, including, without limitation, agents, consultants, freight forwarders, suppliers, or other service providers regardless of the existence of a written contract.

Undue Advantage: any benefit, economic or otherwise, such as money in cash, assets and property, gifts, comforts, courtesies, services and favors, placed at the disposal of a government agent or private individual contrary to the law.

5. GUIDELINES

The present policy has as guidelines:

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- a) Ensure the commitment and support of the members of the Board of Directors and its Advisory Committees, and of the Company's Officers (Senior Management) in the fight against corruption and fraud in its various forms.
- b) Periodically assess the corporate risks related to the existence of acts of corruption and fraud and their respective controls, through its risk management, internal controls and Compliance structure.
- c) Constantly communicate the Company's values and commitments to fight corruption and fraud, as well as disclose the communication channels for denouncement, by means of communication campaigns and training.


5.1 Prohibited Practices

The Brisanet Group prohibits and does not tolerate any practice of corruption, bribery, payment or receipt of bribes either with the Government, domestic or foreign, or with Private Companies, based on the Brazilian and international Anti-Corruption Law.

It is forbidden for administrators, employees, trainees, suppliers or service providers to practice or allow the practice of any form of corruption and fraud under the terms of the applicable legislation and of this policy, as follows:

- a) To promise, offer or give, directly or indirectly, an undue advantage to a government employee or to a person related to him;
- b) To participate in the practice of illicit acts against the Government to benefit oneself;
- c) To use an intermediary natural or legal person to hide or dissimulate its real interests or the identity of the beneficiaries of the acts performed;
- d) To prevent or defraud a public bid, public contract or any related act;
- e) To drive away or seek to drive away a bidder fraudulently or by offering an undue advantage;
- f) To obtain an undue advantage or benefit or to manipulate the economic-financial balance of contracts, by means of fraud, of terms of development and collaboration and/or other related instruments entered into with the Government;
- g) To hinder the investigation or intervene in the performance of inspection agencies, public entities or agents and regulatory agencies; and

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- h) To request, demand, suggest, accept or receive, directly or indirectly, any undue benefits or advantages, whatever their nature, in exchange for the practice or omission in the practice of acts related to the company's processes, businesses, operations or activities, aiming at obtaining direct or indirect benefits for oneself, for the company or for third parties.

5.2 Preventive Practices


Refuting corruption, the Brisanet Group reinforces below some preventive practices to be followed by all those who submit to this policy:

- a) Seek information about the integrity of third parties to be contracted and about the services to be performed, before contracting them;
- b) Seek information about the integrity of possible beneficiaries of resources to be donated/sponsored;
- c) Ensure the legal status of the instruments of assignment of the effective right of use, in the case of occupancy of real estate property owned by the Government, and the fulfillment of the necessary requirements for its maintenance;
- d) Set up internal mechanisms for monitoring and controlling the use of private and public resources;
- e) Develop the critical sense of its employees and other stakeholders so that they can identify attitudes or conducts that may result in undue advantage and therefore not practice them;
- f) Avoid entering into and seek clarification of contracts formalized or under negotiation that are not related to the company's activities;
- g) Promote the culture of clarifying doubts with the immediate manager, legal area or Compliance;
- h) Ensure that any and all payments made are properly controlled and documented in the books and records;
- i) Establish transparent procedures and criteria for selecting employees, suppliers and service providers; and
- j) Encourage the use of the Ethics Channel.

5.3 Responsibilities

5.3.1. Senior Management

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Observe and ensure compliance with this policy, as well as with the provisions of the Code of Ethics, and, when necessary, contact Compliance, for consultation on situations that conflict with this policy or upon the occurrence of situations described herein.

5.3.2. Compliance

Monitor compliance with the guidelines established in this policy, review it annually, and keep it updated to reflect any changes in the Brisanet Group's direction, helping with any doubts regarding its content and application.

5.3.3. Controls and Risks

Advise on the implementation, monitoring and review of the Integrity Program and improve it according to the existing risks or new risks that may be identified.

5.3.4. Internal Audit

Perform the audit work in the Company's areas, following the Annual Audit Plan, and regularly review the effectiveness of the Company's Integrity Program, also recommending improvements to the procedures adopted in the fight against corruption.

5.3.5 Legal Affairs

Advise the Brisanet Group as to the applicability, interpretation and updating of laws or regulations related to the themes of this Policy.

5.3.6 Finance Division

Ensure that the internal control environment mitigates the risk of financial fraud, in compliance with the applicable regulation.


5.3.7. Ethics Committee

Evaluate the cases of corruption and fraud involving management, employees, trainees, suppliers and service providers, reporting them to the Audit Committee.

5.3.8. Ethics Channel

The Brisanet Group's Ethical Denouncement Channel is the means by which unethical behavior or behavior in disagreement with the legislation in force, the Code of Ethics, this policy, and other applicable rules, including suspicions of fraud and corruption, can be denounced. This means of communication will be kept confidential with regard to the management of the information brought to its knowledge, in addition to the secrecy of

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the identity of those who use it and do not wish to identify themselves.

6. REFERENCES

- a) Code of Ethics;
- b) Law n° 12.846, dated August 1st, 2013 (Brazilian Anticorruption Law);
- c) Decree n° 8.420, dated March 18, 2015;
- d) Law n° 8.429, dated June 2, 1992, as amended (Law of Administrative Improbability);
- e) Decree-Law n° 2.848, dated December 7, 1940, as amended (Brazilian Penal Code);
- f) Law n° 9.613, dated March 3, 1998, as amended by Law n° 12.683/12 (Crimes of Laundering or Concealment of Assets, Rights and Values).
- g) CGU Ordinance no. 909/2015;
- h) CGU Ordinance no. 910/2015;
- i) Principle 10 of the Global Agreement.

7. VIOLATIONS AND PENALTIES APPLICABLE

The violation of any term or condition of this procedure will subject the violator to the corrective measures provided for in the applicable legislation and internal rules, including the possibility of unpaid suspension of employment and even the termination of the employment contract, or of the contract for the supply of goods or provision of services if a third party, without prejudice to any possible measure(s) applicable in the administrative and/or civil and/or criminal sphere(s). All reported incidents of suspected violations of this policy will be investigated promptly and appropriately.


The Brisagnet Group takes these risks extremely seriously and requires all of its officers, employees and third parties to do the same.

Violations of the prohibitions in this Anticorruption Policy, or of any anticorruption or anti-bribery law by a third party may result in termination of the business relationship with this party.

8. COMUNICATION OF NONCOMPLIANCE

Any non-compliance with the rule(s) or guideline(s) of this policy should be referred to the Brisagnet Group's Ethics Committee so that the necessary measures can be taken to investigate it:

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- a) **e-mail:** brisanet@canaldeetica.com.br;
- b) **site:** www.canaldeetica.com.br/brisanet;
- c) **phone number:** 0800 591 8826.

9. GENERAL PROVISIONS

9.1. Compliance with the guidelines of this Policy is the responsibility of all its addressees, monitored by the Compliance Area. This commitment ensures that the Companies of the Brisagnet Group can excel in programs of good market practices.

9.2. Questions regarding the interpretation and application of this Policy should be submitted to the Brisagnet Group's Compliance Area.

9.3. No recipient of this Policy will be discriminated against or punished in any way for having refused to commit an act of corruption or potentially characterized as such, even if this refusal has caused the loss of a business or any other consequence harmful to the Brisagnet Group Companies' business.

9.4. This Policy shall be reviewed periodically, at least once every three (3) years or on demand.

10. TERM

The policy described herein is effective as of December 18, 2021.

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