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**ANTI-CORRUPTION POLICY**

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**ANTI-CORRUPTION POLICY****1. Objective**

Set guidelines for the behavior of all professionals and directors at EBSE in virtue of the situations that may imply or characterize the practice of bribery or corruption, in such a way that all of them understand and act in compliance with the applicable anti-corruption laws in all relations with suppliers, customers, representatives and governmental officials, reiterating therefore EBSE's commitment towards the principles of corporate governance, transparency, equality, accounting and accountability for any misconduct, in order to eliminate any risk to the exposure of the Company's image and reputation.

**2. Applicability**

The Anti-Corruption Policy applies to all of EBSE's officers and professionals, in addition to those representing it at all of its subsidiaries, as well as consultants, distributors, agents and independent service providers, even the temporary ones, which, in addition to performing it, shall leverage the enhancement hereof.

**3. Definitions and Abbreviations****3.1 Definitions**

**Bribery** - It is the practice of promising, offering, suggesting or paying to any authority, governor, public official or professional from the private sector any undue benefit as a reward for the person in concern ceases to behave ethically towards their professional duties and may influence any decision in their own or the company's benefit.

**Corruption** - it is the act or effect of bribing one or more persons in their own or the company's benefit, upon the offer for undue benefit. It is further characterized as the use of, by persons from public and/or private sector, illegal methods to obtain undue advantages or benefits in their own benefit or for others.

**Facilitation Payment** - it is a form of bribery in which the involved amount is usually low and paid to a public official of lower hierarchy in order to assure any act or service to which any individual or legal entity is usually and legally entitled on the written laws of the jurisdiction. For the purposes of this policy, the same concept shall apply to the relations with Governmental Authorities or private agents as a corresponding entry to the business relationships.

**Fraud** - It is the act of deliberately misleading others or deceiving processes in order to damage them, and obtaining any Undue Advantage in their own or the company's benefit, by embezzling products or services.

**Undue Benefit** - for purposes of this policy, it must be broadly interpreted and includes any item (either tangible or intangible) which has any value or may generate any benefit to the receiver, in order to morally influence the decision-making process thereon. A few examples: money, valuable objects, assets or services, payments of expenses, job promise or offer, and also presents, gifts, hospitalities and travels not in compliance with the policy defined by the company.

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**Undue Advantage** - It must be comprehensive, but not limited to commercial discounts not compatible to the market practices, financial gains much higher than the market standards, or the obtainment of any privileged or confidential information that may influence any business decisions in benefit of the company that may be due to legitimate commercial factors, such as price, deadline, quality and level of services.

### 3.2 Abbreviations

Not applicable.

### 4. Reference Documents

EBSE's Code of Ethics and Conduct;  
Anti-Corruption Act (Law No. 12.846, as of August 1, 2013), as well as the applicable law.

### 5. Responsibilities

#### 5.1 Managers / employees / service providers on behalf of the company

- Knowing, disseminating, complying with and causing the compliance in all of their activities with the terms, guidance and guidelines set in this Anti-Corruption policy, fostering for the good standing in the relations with all persons and/or companies keeping any direct or indirect relationship with EBSE.
- Promptly informing their superior of any attempt or threat of bribery that may be known in the relations with persons or companies on behalf of EBSE.

#### 5.2 Steering Compliance Committee

- Solving eventual doubts relating to this Policy.

#### 5.3 Executive Office

- Assuring the implementation of this policy and leading the company so that all professionals fully comply with the guidelines in this Policy while performing their activities.
- Discussing the omitted cases.

### 6. Systematics

#### 6.1 Prohibitive Conducts

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They are prohibitive conducts for all employees or third parties, both individuals or legal entities, acting on behalf of EBSE while performing their business.

- Any type of corruption, extortion, fraud or bribery;
- Offering or accepting bribes, kickbacks or any other type of unlawful incentive;
- Promising, offering or giving undue advantage, either directly or indirectly, to any public official or any third party related thereto;
- Taking advantage of any interposed individual or legal entity in order to conceal or dissimulate their actual interests or the identity of the beneficiaries of such acts;
- Forging documents, expense reports, financial records, products and any transaction in order to avoid or circumvent the approval processes and internal controls;
- Any practice of embezzlement, forgery, corporate espionage or unfair and anti-competition practices.
- Frustrating or defrauding, upon adjustment, any combination or any other order, the competitive nature of any public bidding procedure;
- Impeding, disturbing or defrauding the performance of any act in the public bidding procedure;
- Removing or attempting to remove any bidder by means of fraud or offering of any type of advantage;
- Defrauding any public bidding or agreement arising thereof;
- Creating, in a fraudulent or irregular manner, any legal entity to bid in the public bidding process or to enter into any administrative agreement;
- Obtaining any undue advantage or benefit, in a fraudulent manner, for modifications or extensions of agreements entered into with the government, without any legal authorization, in the invitation to bid or respective agreements; or
- Manipulating or defrauding the economic-financial balance of the agreements executed with the government;

**6.2 General Guidelines:**

Every employee or third party, either an individual or a legal entity, acting on behalf of EBSE is not authorized to:

- Promise, offer or also authorize the offering of any **Undue Benefit** implying any personal gain or influencing any decision that may affect the company's business upon obtaining any undue advantage.
- Offer, give, pay, promise or authorize any **Undue Benefit** to persons and/or companies in order to obtain undue advantages for themselves or the company.
- Request, receive or accept any **Undue Benefit** from any third parties, individuals or legal entities representing any gains in their benefit, the benefit of their family members or even any undue advantage for the company.
- The employee shall reject any and all forms of direct or indirect corruption, seeking at all times for transparency in matters that affect their activities, by making use of the control and

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communication mechanisms in order to avoid any misunderstanding in the relations with persons and/or companies.

- The employee shall report through the established means of communication any action involving the favoring of persons and/or companies in any situation that may be characterized as a practice of bribery or corruption.

**6.3 Relationship with Brazilian and Foreign Public Officials**

- Any employee and/or third party, either individual or legal entity, acting on behalf of EBSE, are prohibited to offer, promise, do, authorize or provide any undue advantage to any Public Official (including family members up to third degree of the said official), with or without any purpose of influencing or rewarding any official action or decision by any person in benefit of the company.
- No employee and/or third party, either individual or legal entity, acting on behalf of EBSE shall be punished due to delay or loss of business, sale or revenue, resulting from their refusal to offer any undue advantage to any public official or other counterparty.

**6.4 Engagement of Third Parties acting on behalf of EBSE**

The engagement of Third Party acting on behalf of EBSE must be preceded by the completion of the "Supplier Accreditation Form" and an analysis on their qualification and reputation, taking into consideration the following indicators:

- If the counterparty has a reputation in the engagement market, even if indirectly, on matters related to the Corruption, unethical or potentially illegal acts.
- If the counterparty is controlled by any Public Official or has a close relationship with the Government.
- If the counterparty is recommended by any Public Official.
- If the counterparty refuses or attempts to preclude the inclusion of the anti-corruption clauses in the agreement in writing.
- If the counterparty proposes a financial transaction other than the usually adopted business practices for the type of transaction/business to be performed.

**6.5 Behavioral Guidelines**

For effect of this policy, the following are infringements to the behavioral guidelines:

- Receipt of any economic advantage, either directly or indirectly, as a corresponding entry for any type of privilege that is inherent to the position or function.

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- Use in any private work or service of any vehicle, machinery, equipment or material of any nature owned by the company or under its custody.
- Receiving any type of economic advantage, either directly or indirectly, in order to make misrepresentations or incorrect assessments in virtue of the attributions inherent to their positions or functions.
- Offering any job, trust position or engaging any advisory service of any individual or legal entity having any direct or indirect relation with any public official having any decision-making power that affects the company's interests and business.
- Receiving any economic advantage, either directly or indirectly, in order to intermediate the release of capital in benefit of any individual or legal entity.

**6.6 Gifts, presents, travels and entertainment**

- No gift, present, travel or entertainment may, under no circumstance, be given to any individual, public official or private company in order to influence any decision or improperly offset any undue benefit for the company, its members or employees (Employees and Third Parties).
- Any gift, present, travel or entertainment to be offered or given to any third party, either individual or legal entity, has to follow the practices specified in the Benefit Policy (presents, gifts, meals, entertainment and hospitality) of the company.

**6.7 Facilitation Payment**

- Under no circumstance, the facilitation payment is allowed by the company for the obtainment of any advantage in any of the Company's processes.

**6.8 Contributions and Donations**

- Any contributions or donations in exchange of favors with any individual or legal entity, public official or private company is prohibited by the Company, even if the beneficiary is an institution of charitable nature.
- Whatever the contribution or donation is, even in benefit of any entity of charitable nature, has to be previously approved by the Company's Executive Office and performed only due to legitimate philanthropic reasons in order to serve the humanitarian and support interests to the cultural and educational institutions.
- The contribution/donation shall be made to the charitable institution and not the individual and, in any circumstance, the payment may be made in cash or through the deposit into personal current account, in which it is required to obtain evidence of receipt for the contribution or donation of the charitable institution with execution to the legally constituted manager of the institution.
- Contributions or donations to political parties, political campaigns or candidates to public offices are not allowed.
- Contributions or donations to unions, union members or entities controlled by any union are not allowed.

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- All the sponsorships shall be previously and formally authorized by the Company's Executive Office and be based on agreements formalized between the Company and institutions to receive sponsorship.

**6.9 Cases not provided for in this policy**

Any event not provided for in this policy that may in any way bring doubts on the legal practices of the exercise of their functions or may raise any possibility of, even if concealed, corruption, fraud, extortion or bribery shall be reported to the Company's Executive Office or Steering Compliance Committee so that it may judge the case and direct the actions.

**6.10 Communication, violations and applicable sanctions**

- All professionals (Employees and Third Parties) are responsible for informing any violation or suspicious violation to the requirements in this Policy.
- The communications of violation and suspected violation, identified or anonymous, may be directly made to the Channel of whistleblowings, pursuant to whistleblowing appraisal procedure and communication channels.
- Irrespective of whether the communications are identified or anonymous, the Company shall take the arrangements, to the extent allowed by the applicable law, in order to protect the confidentiality of any whistleblowing filed.
- The Company shall not allow or tolerate any type of retaliation against any person reporting, in good faith, or complaint of violation to this Policy or the Anti-Corruption Acts;
- Any professionals (Employees or Third Parties) involving any retaliation shall be subject to disciplinary acts by the Company, even the termination of the employment agreement, and the violations to this Policy may result into civil and criminal penalties, as the case may be.

**7. Safety, Environment and Health**

Not applicable.

**8. Records**

Identification	(File / document name)
Storage	(Location or directory where the file is)
Protection	(File access criteria)
Recovery	(Method by which the file will be found)
Retention Time	(How long the file will remain active)
Disposal	(Disposal of the file)

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