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## 1. Purpose

The purpose of this policy is to define the guidelines for preventing acts of corruption promoted by employees or third party intermediaries acting on behalf of Mac Jee. Through these guidelines, Mac Jee aims to comply with applicable laws and regulations against bribery and corruption, both in Brazil and abroad, including, but not limited to, Law No. 12.846, of August 1, 2013, of Brazil; the Foreign Corrupt Practices Act ("FCPA"), 1977, of the United States; and the UK Bribery Act ("UKBA"), 2010, of the United Kingdom.

This policy should be read in conjunction with Mac Jee's Code of Ethics and Conduct and other related policies, procedures and regulatory instructions. In the event of a conflict between the Board presented here and any of the documents mentioned above, the employee must follow the most restrictive guideline and inform the Group's Legal department so that it can be regularized..

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## 2. General Information

<b>RESPONSIBLE</b>	Jurídico Department
<b>STORAGE</b>	Computerized system
<b>ACCESS</b>	Free access for employees and third parties.
<b>RECOVERY</b>	<a href="http://www.macjee.com.br/compliance">www.macjee.com.br/compliance</a>
<b>USE</b>	Internal and external
<b>PRESERVATION</b>	Periodic backups made on the server.
<b>RETENTION</b>	For an indefinite period of time.

## 3. Definitions

**“Government Agent”**: A person responsible, either permanently or temporarily, for exercising any state function or function in a governmental entity, in Brazil or abroad. This includes, but is not restricted to, government employees, including members of all branches of powers and of the Public Prosecutor's Office, whether municipal, departmental, state, provincial, central or other categories that may exist in each country in which Mac Jee operates, employees of state-owned companies, whether public corporation or government controlled companies, employees of public universities or government-funded research organizations, members of royal families who have de facto authority or not, members of political parties and members of international institutions such as the United Nations, the North Atlantic Treaty Organization and the International Monetary Fund.

**“Thing of Value”**: Any item that provides tangible benefits to a person or company, and may include, but is not limited to, cash, gifts, political contributions, donations, sponsorships, travel and entertainment expenses, routine expenses such as security and health, the provision of services or employment opportunities, i.e. anything that may carry a material or immaterial value for the person receiving it.

**“Employees”**: It means all Mac Jee employees, regardless of hierarchical level or nature of employment, including Board members. It also applies to all employees and managers of companies whose direct or indirect controlling interest is held by one of the companies in the Mac Jee Group, as well as joint ventures in which one of the companies in the Mac Jee Group is formally designated as the operator.

**“Due Diligence”**: The process of analyzing information and documents from a specific legal entity or individual, in order to evaluate, examine and determine the level of risk involved in conducting business with this individual or entity, carried out before establishing any type of relationship..

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**“Governmental Entity”:** A legal entity owned or controlled by any national, regional, local or other government, or any department or agency thereof, or any government corporation or agency..

**“Mac Jee Group”; "Group" or "Mac Jee”:** It means the Companies Mac Jee Participações Ltda., Mac Jee Industria de Defesa Ltda., Mac Jee Tecnologia Ltda., Equipaer Indústria Aeronáutica Ltda., Bracey Investimentos e Participações Ltda., and all the legal entities in which the aforementioned have an equity interest or equivalent that guarantees them the right to elect the majority of the directors and define the conduct of the business strategies of said legal entities.

**“Facilitating Payments”:** Any situation that may suggest that something is not in compliance with Mac Jee's Code of Ethics and Conduct, Anti-Corruption Policy, other policies, procedures and regulatory instructions or with national and international anti-corruption laws, and is identified during the normal course of business. A red flag can be characterized as a particular transaction, relationship or situation involving the risk of corruption and bribery.

**“Red Flag”:** Qualquer situação que possa sugerir que algo não está em conformidade com o Código de Ética e Conduta, a Política Anticorrupção, demais políticas, procedimentos e instruções normativas da Mac Jee ou com as leis anticorrupção nacionais e internacionais, sendo identificada durante o curso normal das atividades. Uma *red flag* pode se caracterizar como uma transação em particular, algum relacionamento ou alguma situação envolvendo o risco de corrupção e de suborno.

**“Third Party Intermediary”:** Any natural or legal person who is contracted by Mac Jee to carry out activities on its behalf. Examples of third party intermediaries include sales representatives, law firms, brokers or any company that has the power or mandate to deal with other third parties on behalf of the Group. Hiring or granting powers to any third party intermediary is only possible after due diligence has been carried out in accordance with Mac Jee's specific policy.

**“Undue Advantage”:** A benefit or advantage obtained through the payment or transfer of anything of value, to Government Agents or not, in any process or relationship between the Government and or a Governmental Entity and Mac Jee. These advantages include, but are not limited to, obtaining privileged information for a tender, obtaining licenses, permits and certifications in a shorter time than the standard or obtaining them without being entitled, obtaining guarantees from the public sector to enter into or terminate contracts or any other advantage that has an improper perception in society.

## 4. Types of Bribery

### 4.1 For Government Agents

Under the terms of this policy, any attempt to authorize, promise or consent to the delivery or offer, directly or indirectly, of taxpayer money or anything of value to Government Agents in exchange for an undue advantage is considered a bribe.

Employees or third party intermediaries acting on behalf of Mac Jee are not allowed to make payments or transfer anything of value as a bribe.

If any such payment is requested, it is the responsibility of the employee or third party intermediary to refuse the request. No employee or third party intermediary will be penalized due to delay or loss of business resulting from refusal to make payments of this type.

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## 4.2 In the Private (Commercial) Sector

As with Government Agents, any attempt to authorize, promise or consent to the direct or indirect giving or offering of money or anything of value to a third party, other than a Government Agent, in an attempt to gain an improper advantage is considered a commercial bribe.

Mac Jee prohibits any payment by way of commercial bribery and, for the purposes of this policy, the practice of commercial bribery is equivalent to the practice of bribery for Government Agents, including possible disciplinary measures, in the event of violation of the guidelines described herein.

## 5. Facilitation Payments

Facilitating payments may be requested in various processes of interaction with the public sector, such as, but not limited to, obtaining licenses, administrative procedures and court proceedings; permits and certifications; in the processing of documents, application for and issuance of visas; in the customs clearance process and in various other administrative processes. Making such payments is prohibited.

In rare circumstances, a payment of this nature may be necessary to remove or mitigate an imminent threat to the health, safety or well-being of one of our employees. If the employee is in this situation, the payment may be made, and the employee involved must immediately inform the Legal department of the payment and the circumstances in which it was made.

## 6. Relations with the Public Sector

Any relationship between Mac Jee employees and any Government Agent or governmental entity must always be conducted in a transparent manner and guided by honesty and loyalty in business dealings. Mac Jee employees and third-party service providers are also not allowed to engage in fraud or illegal activities, hinder inspection work, or pay bribes to obtain an undue advantage, in any type of relationship with the public sector, such as, but not limited to, tenders, inspection of government agencies and processes for obtaining licenses and certificates.

Communications with the public sector must always be clear and objective, and always through an official Mac Jee channel, so that all exchanges of information are recorded.

Face-to-face meetings with Government Agents must be scheduled in advance, listing the agenda for the meeting and with at least two Mac Jee employees present. At the end of the meeting, Mac Jee employees should take minutes of the issues discussed and decisions made, and share the document with all attendees.

Interactions with the public sector must follow the guidelines set out in the Policy on Relations with Governmental Entities. This policy should be consulted for further details.

Mac Jee does not prohibit the hiring of former Government Agents, but these situations must be properly assessed so that they do not pose risks to Mac Jee's reputation and image.

## 7. General Guidelines

### 7.1 Gifts and Hospitality

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In the normal course of our business activities, situations will arise in which the giving or receiving of gifts and hospitality will be necessary. These events are designed to show cordiality and goodwill between two entities, showing respect and gratitude between them and promoting a good relationship. Therefore, subject to certain limits and rules, Mac Jee authorizes the offering of gifts and modest hospitality payments to third parties, whether Government Agents or not.

The offer of a gift or hospitality must be free of consideration by both parties. It is forbidden to offer gifts or hospitality with the aim of obtaining a quid pro quo or undue advantage, whether from a Government Agent or not, regardless of the value of the gift or hospitality.

All offers of gifts or hospitality must comply with the established value and frequency limits, or undergo prior analysis and approval by the relevant authority, as established in the Gifts, Entertainment and Hospitality policy. In any case, the offer of a gift or hospitality must be made with the expectation that it will be public knowledge. If the offer would cause any embarrassment to the person making the offer, it should not be made.

Gifts and hospitality offered by Mac Jee employees must comply with the following conditions:

- Be in connection with the Group's activity, promoting a product or service offered;
- Be transparent, i.e. consider that the general public would be aware of what is being offered;
- Not appear to be luxurious or extravagant. In other words, something that can be divulged to other people without embarrassment;
- Respect the value limits stipulated in Mac Jee's policies and procedures - for gifts R\$ 100.00 in Brazil or US\$ 100.00 in other countries. The limit for each type of hospitality should be consulted in the Gifts, Entertainment and Hospitality Policy;
- Do not disrespect local culture (such as offering alcoholic beverages in countries that prohibit their consumption, for example);
- Not be a recurring offer for that person or entity, respecting the frequency limits established in the Gifts, Entertainment and Hospitality policy;
- Be documented and recorded correctly in the accounting books.

Regarding the receipt of these courtesies, employees are allowed to receive gifts, with no commercial value, which are intended to promote some action of the governmental or private entity, such as pens, caps, brooches and T-shirts.

However, Mac Jee employees are prohibited from receiving gifts and hospitality that exceed the limits defined in the Gifts, Entertainment and Hospitality Policy, have any perception of extravagance or could in any way influence the employee's impartiality in their activities carried out for Mac Jee. The limit for receiving gifts is R\$ 100.00 in Brazil and US\$ 100.00 abroad. For hospitality limits, the policy mentioned above should be consulted, as the limit varies for each type of hospitality offered. Gifts or hospitality with these characteristics must be refused or returned..

In cases where it is not possible to refuse or return hospitality of significant value or perceived by third parties to be significant, either at the insistence of the giver, because the refusal seems offensive or for some other reason, the hospitality must be forwarded to the Legal department, which will take the appropriate measures to have it donated to charity.

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For more information and details, please refer to the Gifts, Entertainment and Hospitality Policy.

## 7.2 Invitations and Entertainment

[All employees are prohibited from directly or indirectly promising, offering or providing any kind of entertainment to government officials, such as invitations to sports tournaments and events, congresses, music concerts, theaters and cinemas.

In addition to the ban on Government Agents, Mac Jee discourages the provision of invitations and entertainment to other types of third parties. Exceptions must be approved by Mac Jee's Board of Directors. These offers, however, are prohibited in situations that:

- They involve Government Agents and/or governmental entities other than the third party receiving the invitation;
- They are not related to a legitimate business purpose;
- They are offered as a bribe, reward or irregular commission;
- They create the impression or an implicit obligation that the Group's interests will be served through preferential treatment or undue advantages in business transactions, such as in obtaining a contract;
- They are not justifiable in the context of the business occasion, involving locations inappropriate for the business;
- They are offered for adult entertainment or any type of event involving pornography or obscene behavior.

## 7.3 Donations and Sponsorships

Mac Jee, aware of the needs of the communities in which it operates, authorizes donations and sponsorships, provided that they strictly follow the guidelines established by the Group, which aim to ensure that such contributions are not characterized as an illicit payment, as a way of influencing decisions or as a violation of anti-corruption laws.

Donations should be made to institutions with the aim of helping with an activity that has a positive impact on society. It is important that donations are only made to organizations that are transparent about the use of the money, resources or services, and that donations are not made to organizations that do not allow Mac Jee to verify that the donation was used for its original purpose.

Sponsorships, on the other hand, should only be made with the aim of promoting Mac Jee's brand and products, or in cases where it is proven that some kind of benefit has been transferred to the community, such as cultural, welfare, educational and sporting support, among others.

All donations and sponsorships made must comply with Mac Jee's Code of Ethics and Conduct and all applicable laws, and may not have objectives other than those mentioned above.

It is forbidden for Mac Jee employees to offer donations and sponsorships in order to get any undue advantage or obtain any benefit of their own, as well as the payment of donations and sponsorships that may in any way promote any member of the municipal, state or federal administration.

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Before sponsorships and donations are paid, due diligence must be carried out on the organization to ensure compliance with Mac Jee's rules. In order for payment to be made, the following conditions must also be met:

- The transaction must be reviewed and approved by the Ethics Committee, following the due diligence analysis;
- The donation or sponsorship must be linked to the company's business or its brand and image;
- The transaction must be approved by those responsible, depending on the amount involved;
- The transaction must be duly recorded in accounting systems;
- The use of donation or sponsorship resources must be monitored to ensure that their purpose is achieved;
- Additionally, donations should not be made to entities that:
  - Are in any stage of negotiation with Mac Jee or have any ongoing relationship;
  - Are wholly or partly owned by an employee or relative of an employee of Mac Jee, or a person who has been an employee of Mac Jee in the last 24 months;
  - Work with the exploitation of slave labor, child labor or collaborate with human trafficking;
  - Could in any way damage Mac Jee's image and reputation

In addition, donations or sponsorships to individuals are not permitted.

All expenses for donations and sponsorships must be properly documented and recorded in specific accounting accounts.

## 7.4 Corporate Events

A Mac Jee may organize or participate in various types of events to promote its brand, its products and strengthen relationships with partners and customers. At these events, the following rules must be complied:

- The guidelines on offering and receiving gifts and hospitality apply in all circumstances, including at these events;
- It is not permitted to use event companies and agencies as a third-party intermediary for the payment of gifts and hospitality without them being able to provide a specific breakdown of this type of expense. Therefore, when contracting the services of agencies for events or trade fair stands, it is necessary to inform them of Mac Jee's policies and procedures involving gifts and hospitality;
- Expenses or events with government officials should not be authorized for more than the usual amount. The limits for hospitality such as meals, accommodation and transportation are defined in the Gifts, Entertainment and Hospitality Policy and should be used as a basis for determining the amounts spent on events with Government Agents;
- The organization of events in luxurious places, such as resorts and casinos, is not encouraged;

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- If Mac Jee participates in an event organized by another entity, it is necessary to follow both the Group's internal procedures and policies and the guidelines issued by the event organizer. If any recommendations conflict, the employee must follow the one that is most restrictive.

## 7.5 Conflict of interest

Our employees are expected to carry out their activities in the best interests of Mac Jee. For this reason, the existence of a conflict of interest, which could have an impact on our employees' decision-making for the benefit of the Group, must be avoided. Our employees have a duty to inform their leadership, the Legal department or the Human Resources department of any and all cases in which a conflict of interest is perceived.

Additional guidance and details on conflicts of interest can be found in Mac Jee's Code of Ethics and Conduct and also in the Conflict of Interest Policy.

## 7.6 Third Party Due Diligence

Mac Jee has dealings with various third parties for different reasons, whether it's a contract with a supplier, a sale to a customer or even a charity that will receive some kind of donation.

The Group must carry out due diligence on these third parties to ascertain the impact of a relationship before it is formally entered into or continued. The higher the Group's risk of exposure in a given relationship, the more detailed the analysis carried out must be. All "red flags" identified in the course of these analyses must be dealt with satisfactorily and documented before the relationship with the partner is released. Without a valid due diligence certificate, it will not be possible to proceed with negotiations and execute the contract with the third party. If due diligence is denied, negotiations with the third party in question must cease.

Third-party intermediaries, who act on behalf of Mac Jee, represent a greater risk to the Group, given that, under the applicable legislation, Mac Jee can be held liable for any bribes and acts of corruption committed by these third-party intermediaries, even without having knowledge of the improper conduct.

In order to carry out the due diligence process, the responsibilities will be shared by several people in the Mac Jee Group, including the requesting employee. The requesting employee will be responsible for maintaining relationships with third parties to obtain information and for carrying out some internal activities, such as filling in due diligence questionnaires. All roles and responsibilities are detailed in the Third Party Due Diligence policy. For further details on the process, please refer to this policy.

## 7.7 Offsets

"Offsets" are compensations that some clients, usually governments or government agencies, may demand in order for a contract to be executed. A contract that contains Offset clauses determines that the counterparty must commit to offering business or creating value for its customers or its country, such as hiring and/or subcontracting a local supplier, using local labor, transferring technology, socio-cultural activities for the local population, among other possibilities.

Mac Jee is aware that contracts with Offsets clauses are existing practices in some countries and localities and are often prescribed in local laws and regulations, however, in order to avoid any type of undue or illicit relationship, Mac Jee has strict rules for such clauses to be accepted.

Whenever possible, it is preferable for Mac Jee to be able to choose the third parties that will be involved in Offset agreements, rather than receiving a referral with limited options. All third parties involved in an Offset agreement must undergo high-risk due diligence, and may not be hired or remunerated prior to the completion of this process.

Contracts with Offset clauses must undergo a detailed review by the Legal department to ensure compliance with  
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legal and financial issues. The Legal department must map and document the main risks involved in the contract and file all documentation generated in the process.

All offset contracts must be approved by Mac Jee's Chief Executive Officer.

## 7.8 Political Contributions

All contributions to political campaigns, candidates or elected officials, as well as donations or sponsorships that contribute to the image of any member of the municipal, state or federal government are prohibited by Mac Jee, as established by the Code of Ethics and Conduct. As such, it is forbidden to associate the Group's image with any election campaign or elected official.

All Mac Jee employees are free to have their own political opinions and to exercise them on a personal level, but it is forbidden to use any of Mac Jee's resources to assist in these activities, such as its brands, the granting of space for events, the use of the Group's internal contact network or any tool that could be useful for electoral purposes.

## 8. Mergers and Acquisitions

In order to carry out mergers and acquisitions and other forms of business associations, Mac Jee must carry out due diligence on the target company, with the aim of identifying acts of corruption or other types of illegal conduct, as well as the existence of controls that mitigate this type of risk.

If any irregularity in relation to compliance with anti-corruption laws is identified, the item must be promptly reported to Mac Jee's Ethics Committee.

It is important to include anti-corruption clauses in the Sales Agreements of the companies that will become part of the Mac Jee Group, in addition to considering other options to avoid the succession of any liabilities prior to the closing of the transaction. After the transaction is completed, it is important that the target company integrates all the principles set out in this Anti-Corruption policy into its internal policies and procedures.

## 9. Accounting Controls

In compliance with applicable laws and internal policies, all accounting entries must be recorded accurately and in sufficient detail to reflect all transactions that have been made by the Group in an accurate and appropriate manner. To this end, Mac Jee must ensure that all transactions and operations are documented, correctly approved, described and coded in relation to the correct expense.

In relation to expenses of any kind, all employees and third party intermediaries must record the amounts accurately, indicating as much detail as possible and including the appropriate supporting documentation so that the amount and nature of the payment can be guaranteed.

No person may make a false representation or mischaracterize any information in the Group's accounting books. Therefore, all employees and third-party intermediaries acting on behalf of Mac Jee must not intentionally provide false information regarding the value and nature of the transaction being recorded, including the omission of information about the payment.

This includes the omission of details that impair the identification of the expense or the reasons for it having

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occurred. In addition, Mac Jee prohibits secret operations that are neither reported nor recorded.

## 10. Red Flags

Any red flags identified must be carefully analysed and measures defined to minimize or eliminate the risk posed by the transaction or relationship, including terminating the relationship with the third party.

If the employee identifies any event or situation that poses a risk of non-compliance with anti-corruption laws and the Group's internal policies and procedures, the employee must inform the Legal department or report their concern through the Whistleblowing Channel.

Some examples of red flags can be found in the list below. It is important to note that the list is not exhaustive and is intended to provide just a few examples as a parameter:

- Payments offered or made in cash;
- Payments or requests for payments to accounts in countries known to be tax havens;
- Payments or requests for payments made to suppliers in a country other than the one in the contract;
- Relationships with companies appointed by the public sector;
- Payments made to governments with high levels of corruption;
- Hiring former Government Agents;
- Hiring relatives and family members of third parties, whether Government Agents or not;
- Commissions and fees from third parties that exceed the usual rate paid by companies in that region or generally exceed what Mac Jee usually pays;
- Offering or soliciting extravagant or lavish gifts or hospitality;
- Inadequately documented expenses or payments.

## 11. Communication and Training

Training on this Anti-Corruption policy will be carried out periodically for all Mac Jee employees who perform activities considered to be at risk, such as those who interact with governmental entities, and employees in the Accounting, Commercial, Legal and Procurement areas.

Other employees will receive information through internal communication, such as corporate emails and materials distributed by Mac Jee. All employees joining Mac Jee must sign the Code of Ethics and Conduct, which conveys the Group's message of zero tolerance for corruption.

Third-party intermediaries may also receive communications and training on this Anti-Corruption Policy, as they must also follow the guidelines set out in this document.

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## 12. Whistleblowing, Sanctions and Non-Retaliation Policy

All Mac Jee employees must report any act that violates the guidelines of this policy, such as bribery, solicitation or offer of undue payment or advantage, through the Group's Whistleblowing Channel. The report can be made via <https://contatoseguro.com.br/macjee>.

All reports made through the channel will be investigated and, if the facts reported are confirmed, the people or companies involved will be subject to the sanctions mentioned in the Code of Ethics and Conduct and also in the Group's Disciplinary Measures Policy, such as, but not limited to, verbal warning, written warning, suspension, dismissal or termination of the contractual relationship. The severity of the sanctions will be proportional to the deviations identified. After evaluating the reported conduct, the Group Ethics Committee will assess the need to report the fact to the relevant authorities, where applicable.

Mac Jee does not tolerate any kind of retaliation or penalty for employees who have made a report in good faith. No internal Group policy or procedure prohibits or restricts employees from reporting any concerns or illegal activities of which they are aware directly to the relevant regulatory authorities.

## 13. References

- Código de Ética e Conduta;
- FCPA (*Foreign Corrupt Practices Act*);
- UKBA (*UK Bribery Act*);
- Law No. 12.846, of August 1<sup>st</sup>, 2013;
- Policy on Relations with Governmental Entities;
- Gifts, Entertainment and Hospitality Policy;
- Conflict of Interest Policy;
- Third Party Due Diligence Policy;
- Disciplinary Measures Policy.