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## 1. Purpose

The purpose of this policy is to establish rules, limits, responsibilities and procedures for the offer and receipt of gifts, entertainment and hospitality to or from individuals who are not part of Mac Jee, with the aim of ensuring that these courtesies are offered or received in a transparent manner and are not used for improper purposes.

## 2. General Information

<b>RESPONSIBLE</b>	Legal Department
<b>STORAGE</b>	Computerized system
<b>DISTRIBUTION</b>	Electronic address where the instruction is available for consultation (PDF).
<b>ACCESS</b>	Free access to all sectors for consultation / Only the legal department is allowed to make changes.
<b>RECOVERY</b>	Electronic address where the instruction is available for consultation (PDF).
<b>USE</b>	All sectors of the company
<b>PRESERVATION</b>	Periodic backups made on the server.
<b>RETENTION</b>	For an indefinite period of time.
<b>DISPOSITION</b>	
<b>RECORDS</b>	

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### 3. Definitions

**“Government Agent”:** A person responsible, either permanently or temporarily, for the exercise of 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 levels, municipal, departmental, state, provincial, central or other categories that may exist in each country, employees of state-owned corporations, 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.

**“Free Gifts”:** Items with insignificant value, produced for mass distribution to the public as part of the company's efforts to strengthen and maintain brand recognition. Gifts are usually offered at public events or events with a large public presence. Examples of gifts are: notebooks, devices, key chains, headphones, badge lanyards and brooches bearing the Mac Jee brand logo.

**“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 controlling interest, direct or indirect, 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.

**“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.

**“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.

**“Entertainment”:** It includes any event, performance, or activity for entertainment purposes such as, for example, sporting events, congresses, musical shows, cinema, theater, karaoke, or wine tasting.

**“Hospitality”:** Any meal, travel, accommodation or entertainment offered by Mac Jee, its employees or third party intermediaries to any customer or other individual or entity that is not part of Mac Jee, free of charge or when the recipient pays less than market value.

**“Per Diem”:** Amount offered per day to cover complementary or agreed expenses.

**“Gift”:** Any item offered to or received from any individual or entity that is not part of Mac Jee, free of charge or below market value, without any expectation of getting something in return.

**“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.

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## 4. General Guidelines

### 4.1 Applicable Principles

The offering of free gifts, gifts, entertainment and hospitality is considered a common courtesy in business, which symbolizes an attitude of kindness and respect, provided that this practice is carried out in compliance with applicable laws and regulations.

In some situations, offering or receiving free gifts, gifts, hospitality and entertainment may create an expectation or claim of favoritism in exchange for the courtesy, a perception that some kind of undue advantage or conflict of interest has occurred. This policy determines the guidelines to be followed to prevent these situations from occurring, as they are practices prohibited by Mac Jee and also by various anti-corruption laws around the world.

The sections below describe the applicable guidelines for giving and receiving free gifts, gifts, entertainment and hospitality. If employees find themselves in a situation not covered by this policy and have any doubts about the applicable rules, they should contact the Legal department, which will advise them on how to proceed..

### 4.2 Gifts and Free Gifts

Any item that an employee offers or receives from any individual or entity that is not part of Mac Jee and that is not provided for in a contract may be considered a free gift or a gift. Mac Jee has specific rules for the various types of items that can be offered as free gifts and gifts and, depending on how these are characterized, the offering and/or receipt may be permitted, restricted or prohibited by the Group.

The sections below show the types of free gifts and gifts and the restrictions on offering and receiving them. If you have any doubts about whether or not you can offer or receive a gift, employees can contact the Legal department.

#### 4.2.1 Offering free gifts and gifts

Mac Jee understands that there are social and professional customs related to offering gifts to customers, suppliers, business partners and other individuals who are not part of the Group, in Brazil and around the world. Although not prohibited in some circumstances, the offering of free gifts and gifts can pose significant risks of corruption and result in a violation of laws on the subject, when used to obtain an undue advantage or to improperly avoid a situation or result.

To ensure compliance with ethics and integrity, as well as applicable laws on the subject, the sections below list the rules that must be followed when offering free gifts and gifts.

##### 4.2.1.1 Free gifts

Free gifts are promotional items that have a negligible value and are produced for mass distribution, with the aim of strengthening and maintaining Mac Jee's brand recognition in the market. The most common examples of free gifts include, but are not limited to, notebooks, key chains, headphones, badge lanyards, caps, pens and brooches, always associated with the Mac Jee brand.

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The offering of free gifts is permitted by Mac Jee, however, it is important that it is always linked to some kind of event with public attendance, such as demonstrations of the Group's products, Defense sector fairs, conferences, business meetings or training sessions. The giving and receiving of free gifts must always respect the local laws and culture of the country in which they are being given or received.

Free gifts that do not bear the Mac Jee brand, i.e. items that do not contain the Mac Jee name or logo, will be considered as gifts and must follow the guidelines in the section below.

#### 4.2.1.2 Gifts

Gifts are items with some market value that may be offered or received during a relationship with a customer, supplier, or any other individual or entity that is not part of Mac Jee. The offering of gifts by Mac Jee employees must strictly adhere to the following guidelines:

- Not be made with the intention of influencing the recipient;
- Not be made to any Government Agent or any individual when a regulatory or contractual decision by Mac Jee is pending with that person;
- The item(s) must not be luxurious or extravagant;
- Respect the limit of BRL100 (one hundred Brazilian reais), if the gift is offered in Brazil, and US\$100 (one hundred US dollars), if the gift is offered in any other country (Attachment I - Limits for Offering Free Gifts, Presents, Entertainment and Hospitality);
- Occur sporadically, with a limit of four gifts offered in a 12-month period to the same recipient (Attachment I - Limits for Offering Free Gifts, Presents, Entertainment and Hospitality);
- Be approved by the immediate leader of the employee making the offer;
- If it exceeds the established value or frequency limits, be approved by the Chief Executive Officer in the case of gifts to Government Agents or by the Board of Directors in the case of gifts to third parties who are not Government Agents;
- Be made in connection with the promotion, demonstration or description of Mac Jee's products and services;
- Be offered in an open and transparent manner, in the ordinary course of business, i.e. something that can be disclosed to others without embarrassment;
- Be in accordance with the local laws and culture of the country in which the recipient of the gift is based;
- Be permitted in accordance with the internal rules and policies of the recipient's organization, agency or company, and any contractual obligations between Mac Jee and the recipient's organization, agency or company;
- Be fully documented and supported by receipts and supporting documentation;
- Be correctly recorded in the accounting records of the Group companies.
- In addition, offers of:

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- Cash or cash equivalents (gift vouchers or discount vouchers, for example);
- Raffles in which, although their value is not significant, the gift to be raffled has a significant value;
- Alcoholic drinks;
- Tobacco or similar;
- Items with religious symbols;
- Illegal products.

Gifts do not necessarily have to be given at events attended by a large audience, however any gift giving in environments and situations that could generate the perception of corruption is prohibited. As mentioned above, the gift offer must be open and transparent.

Gifts may or may not bear the brand, name or logo of Mac Jee Group companies. However, Mac Jee encourages its employees to offer gifts that contain representations of its brand, since in addition to promoting the good relationship between the parties, it will also serve to publicize and promote it.

Gifts to Government Agents represent a greater risk for the Mac Jee Group and therefore attention must be redoubled in these cases. Mac Jee encourages gifts to be made to the governmental entity and not to the Government Agent representing it (for example, giving to the city council instead of to the mayor representing it). Gifts to Government Agents that exceed the value limits established in the policy are prohibited. Exceptions must be approved by Mac Jee's CEO.

Often the governmental entity itself has strict rules regarding the receipt of gifts from third parties. In these cases, our employees must ensure that the offer of gifts complies with all the rules of the governmental entity being represented by the agent, collaborating in providing any necessary information.

It is the responsibility of Mac Jee employees to comply with all the conditions set out in this policy, as well as complying with the Code of Ethics and Conduct and the Group's other internal policies and procedures when offering a gift. If any guideline is not followed, disciplinary action may be taken against employees or third parties may be terminated.

All the values of gifts, free gifts and hospitality must be highlighted in the area's budget and a form must be submitted with justification, values and to whom the gift is being addressed.

#### 4.2.2 Receiving free gifts and gifts

The receipt of free gifts by Mac Jee employees is permitted, whether offered by Government Agents or not, as long as it respects all the above-mentioned guidelines on the offering of gifts and presents.

Any item that is not a free gift may not be accepted by Mac Jee employees, except in accordance with the rules set out in this policy. Employees are prohibited from receiving gifts from suppliers, service providers or third parties who are participating in a tender or renewing proposals to supply services, products or materials to the Mac Jee Group, in order to avoid any perception of inappropriate behavior.

The receipt of gifts by other employees is permitted, provided they respect the limits of value (R\$ 100.00 in Brazil and U\$ 100.00 abroad), frequency (less than four times in a 12-month period from the same partner) and other guidelines mentioned in the section on gift giving (4.2.1.2).

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If a Mac Jee employee receives any gift offer that they are prohibited from accepting under the guidelines of this policy, they must explain the Group's guidelines and politely decline the gift. If the situation does not allow the employee to refuse the gift offered, either at the insistence of the offeror, because the refusal is offensive or for some other reason, the gift should be forwarded to the Legal department, which will take the appropriate measures to have it donated to charity.

### 4.3 Entertainment

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

In addition to the prohibition for Government Agents, Mac Jee discourages the offer of invitations and entertainment to other third parties who are not part of the Group.

In the event of receiving invitations to entertainment events, the Mac Jee employee must consult the Legal department to decide whether or not to accept the courtesy. In order to make a decision about receiving invitations, the Legal department must consider the following guidelines about the entertainment event:

- It must be related to a legitimate business purpose;
- It must respect the value limits of BRL 300.00 in Brazil and US\$ 100.00 abroad (Attachment I - Limits for Offering Free Gifts, Gifts, Entertainment and Hospitality);
- It must not be accepted in exchange for any undue advantage from the employee or the perception that any undue advantage is involved in receiving it;
- It must not involve locations inappropriate for the business;

If Mac Jee determines that the employee cannot accept the invitation, the employee must refuse the offer. If refusal is not possible for any reason, it will be up to the Legal department to determine the measures to ensure that receiving the invitation is not characterized as improper, such as suggesting that it be donated, for example.

### 4.4 Hospitality

As well as gifts and free gifts, the giving and receiving of hospitality can be part of everyday business life. Although it is not prohibited, the giving and receiving of hospitality can pose significant risks of corruption and result in violations of the relevant laws. Therefore, employees must follow the guidelines described in this section when offering and receiving hospitality.

The conditions for offering and receiving each type of hospitality will be presented. Hospitality payments for situations not described in this policy should be avoided. If the hospitality to be offered or received is not explained in this policy, the employee should contact the Legal department to receive the appropriate guidelines.

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#### 4.4.1 Offering Hospitality

Hospitality may only be offered to individuals or entities that are not part of Mac Jee if it complies with the following guidelines:

- It must not be made with the intention of influencing the recipient;
- It must be approved by the immediate leader of the employee making the offer;
- It must comply with the value limits and periodicity set out in Attachment I of this policy, or be approved in advance by the CEO;
- It must be related to the promotion, presentation of Mac Jee's products, solutions and services, or to the visit of facilities of Group companies for analysis and better understanding of the activities carried out by Mac Jee;
- It must be related to the performance or execution of a contract and is specifically provided for in the text of the contract, etc;
- It must be related to information or training workshops or seminars (e.g. Defense sector seminars), or for candidates during the selection process;;
- It must be offered in an open and transparent manner, in the normal course of business;
- It must comply with the local laws and culture of the country in which the recipient of the gift is based;
- It must be permitted in accordance with the internal rules and policies of the recipient's organization, agency or company, and any contractual obligations between Mac Jee and the recipient's organization, agency or company
- It must not include expenses of any relative of the recipient;
- It must be fully documented and supported by receipts and supporting documentation;
- It must be correctly recorded in the accounting records of the Group's companies.

A oferta de hospitalidades para agentes públicos deve ser limitada e restrita às situações onde ela for extremamente necessária e requerida pelas autoridades ou órgãos públicos, tais como certificações que exigem o pagamento de per diem às autoridades certificadoras quando estão realizando certificações de produtos nas instalações e plantas da Mac Jee.

Government Agents are often subject to restrictions imposed by the government or other agencies that are more severe than those described above. Mac Jee employees must cooperate with the recipient to ensure that the hospitality provided is of the type and value that the recipient is authorized to accept and that any related requirements, such as reporting to the recipient's employer, are met.

##### 4.4.1.1 Value limits

The value and frequency limits for offering hospitality by Mac Jee employees are described in Attachment I - Limits for Offering Free Gifts, Gifts, Entertainment and Hospitality. This document determines the value and frequency limits for each type of hospitality, such as travel, meals and accommodation. ny

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payment that exceeds the value or frequency limits in this document must be authorized by Mac Jee's Board of Directors.

#### 4.4.1.2 Process for offering hospitality

In order for hospitality expenses to be reimbursed, the employee must complete the hospitality request form in Attachment II - Hospitality Request Form. This form must be sent to the Finance department together with the other documentation required in the reimbursement process. Failure to submit this form or to obtain the necessary approvals may result in the expenses not being reimbursed.

Transactions that do not exceed the value or frequency limits set out in attachment I of this policy must be approved by the area manager. In cases where the hospitality exceeds the value or frequency limits, the hospitality request form (attachment II) must be approved by the Board of Directors before the hospitality is offered.

Failure to comply with this policy and the limits on the value and frequency of hospitality may result in disciplinary action for employees and contractual termination for third parties.

#### 4.4.2 Types of hospitality

##### 4.4.2.1 Travel

Hospitality relating to travel, whether by land, air, sea or other means of transportation, should only be offered in situations that are permitted under applicable law and this internal policy, and when reasonably necessary to facilitate legitimate business activities.

Regardless of the costs involved, it is forbidden to offer or receive travel that is characterized by any of the following situations:

- Passagem aéreas em primeira classe;
- First class airline tickets;
- Rental cars that are perceived as luxurious by the general public;
- Use of tourist cruises for travel.

##### 4.4.2.2 Meals

Meals can only be provided by the Group's employees if they follow the guidelines and limits established by this policy. Meals can take place during breakfasts, lunches, snacks and dinners, however Mac Jee discourages offering and receiving meals in the evening. If an employee is in any doubt as to whether the provision of a meal may be in breach of the Mac Jee Group's guidelines, they should contact the Legal department for clarification.

Regardless of the amount to be paid, it is forbidden to offer meals that include:

- Alcoholic beverage;

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- Meals in restaurants presenting a show or event (unless the entertainment rules of this policy are complied with);
- Meals in luxurious or perceived luxurious restaurants;
- Lunch and dinner only

#### 4.4.2.3 Accommodation

Accommodation offered by Mac Jee Group employees must not be extravagant or the main attraction of the event or trip. If hospitality is being offered in connection with an event, hotel accommodation close to the venue should be prioritized. If there is a Mac Jee accredited hotel in the area, it should be used as the first option.

Regardless of the amount to be paid, it is forbidden to offer or receive accommodation in:

- Hotels with casinos or other forms of gambling on their premises;
- Hotels that are characterized as resorts with leisure activities on offer;
- Hotels that present a perception of luxury or extravagance;
- Hotels that do not provide the minimum hygiene and safety conditions;
- Establishments that do not have individual rooms.

#### 4.4.3 Receiving hospitality

Receiving hospitality from Government Agents is prohibited. In general, Government Agents are not in the habit of paying for hospitality for third parties, but if a Government Agent offers to pay for hospitality for an employee, the employee must explain the Mac Jee Group's guidelines and politely refuse the offer. If refusal is not possible for any reason, the employee should inform Mac Jee's Legal department, which can advise the employee on the precautionary measures that should be taken.

In all other cases, hospitality is permitted, as long as all limits on the amount and frequency of hospitality are respected and the other guidelines mentioned above on hospitality are followed. Employees must be aware that they are carrying out an activity on behalf of Mac Jee and must respect all the guidelines set out in the Code of Ethics and Conduct and internal policies and procedures. Receipt of hospitality that exceeds the value and frequency limits set out in attachment I of this policy must be refused by the employee.

### 5. Violations and sanctions

Any violation of the guidelines established herein or any other internal policies and procedures of the Group are subject to disciplinary measures by Mac Jee, as prescribed in the Disciplinary Measures Policy.

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Reports of violations of this policy can be made through Mac Jee's reporting channel at <https://contatoseguro.com.br/macjee>. Employees are assured that under no circumstances will the authorship of the communication be revealed, and are guaranteed total confidentiality and secrecy, both of identity and of the content of the communication formalized through the reporting channel.

## 6. References

- Code of Ethics and Conduct;
- Anti-Corruption Policy;
- Conflict of Interest Policy;
- Disciplinary Measures Policy;
- IN - CT 001 - Reimbursement of Expenses Despesas

## 7. Attachments

Attachment I – Limits on the Offer of Free Gifts, Gifts, Entertainment and Hospitality



AttachmentI – Limits  
on the Offer of Free  
Gifts

Attachment II – Hospitality Request Form



Attachment II -  
HospitalityForm.doc