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1. Purpose

In keeping with our commitment to ethics and transparency, the purpose of this policy is to create mechanisms for verifying third parties, making it possible to identify possible risks (financial, image or reputational) and red flags involved in these third parties' relations with Mac Jee. In this way, steps will be described which must be followed to ensure detailed analysis of the third party, according to the level of risk defined in this policy for each type of relationship.

2. General Information

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

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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 spheres, 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.

“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.

“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 legal entities in which the aforementioned have an equity interest or equivalent that guarantees them the right to elect the majority of directors and define the conduct of the business strategies of said legal entities..

“Strategic Partnership”: A relationship between Mac Jee and third party entities or individuals, whether or not competitors of Mac Jee, with the aim of jointly developing products, technology, sales or marketing activities, in which the risks and profits of the business are shared between the parties.

“Red Flag”: 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.

“Third Party”: All representatives; service providers; outsourced employees; and any other natural or legal persons and other business partners, or not, of Mac Jee.

“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 Company.

“Undue Advantage”: Advantage or benefit obtained through 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 bidding process, obtaining licenses, permits and certifications in a shorter time than the standard or obtaining them without having the right, obtaining guarantees from the public sector to enter into or terminate contracts or any other advantage that is improperly perceived by society.

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4. General Guidelines

The due diligence process is intended to provide greater transparency in Mac Jee's interactions with third parties with which it has a relationship or intends to have a relationship, including third party intermediaries. This section defines the guidelines to be followed to ensure that this objective is achieved, as well as to guarantee compliance with applicable laws.

Some types of services and relationships with third parties are exempt from the due diligence process, such as third parties that are public service concessionaires, for example. Below is a list of the types of services, interactions and payments that are exempt from undergoing this due diligence process:

- Water supply and sewage treatment;
- Electricity distribution, as long as the purchase is not made on the free energy market;
- Gas distribution services;
- Initial interactions between Mac Jee and the third party, in which the parties assume no obligations of any kind, except those relating to confidentiality;
- Analysis of samples of goods or services, provided that this does not create any obligation or the perception that any undue advantage will be offered to the third party;
- Payments of amounts described in a court decision or taxes and duties that are directly levied,

Until all stages of the due diligence process are completed, the guidelines below must be followed, except for the types of relationship mentioned above as exempt from going through the due diligence process:

- Mac Jee may not enter into any agreement or sign any contract with the third party;
- Mac Jee may not make payments or promises of payments to the third party;
- The third party may not supply goods or services to Mac Jee.

At the end of the due diligence process, if the interaction is approved, a certificate will be issued to the third party, guaranteeing that an analysis of the relationship it will have with Mac Jee has been carried out. The process for issuing the due diligence certificate is detailed in the sections below.

4.1 Categorías de Risco

The process for carrying out due diligence will depend on the level of risk of the activity carried out by the third party or the type of interaction Mac Jee will have with it. These activities and/or interactions must be characterized as high, medium or low risk and, for each of these classifications, different steps must be followed to issue the due diligence certificate.

The only exception to the above rule is third parties who receive donations or sponsorships from Mac Jee, who will follow a slightly different process, detailed in section 4.2.4 of this policy.

Below is a list of the types of services and/or interactions that are considered high, medium or low risk. If employees have any questions about how to classify a due diligence request, they should contact the Legal department for further clarification.

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4.1.1 High risk

Third parties who provide the following services or have the following interactions with Mac Jee must follow the high risk process:

- Commercial representation;
- Strategic partnerships;
- Mergers and acquisitions and joint ventures;
- Any natural or legal person dealing with governmental entities on behalf of Mac Jee;
- Supply of products and/or services on the basis of offset contracts;
- The following logistics services: warehousing, land transportation, customs clearance, freight forwarding, and phytosanitary treatment services;
- Legal services in which the law firm will represent Mac Jee legally;

4.1.2 Medium risk

Third parties providing the following services or having the following interactions with Mac Jee should follow the medium risk process:

- Consulting services, where the provider will not be acting on behalf of Mac Jee;
- Payroll services;
- Surveillance and property security services;
- Information technology services;
- Legal services, in which the law firm will not act as Mac Jee's representative;
- Marketing, communication or event services;

4.1.3 Low Risk

- Services and interactions that do not fit into any of the characteristics mentioned in the previous two sections. All services classified as low risk will not be subject to the due diligence provided for in this policy.

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4.2 Due Diligence Process

For all interactions with third parties that require due diligence, it is up to the employee who will be responsible for contacting the third party to request the analysis. The employee must complete the due diligence questionnaire 01 (Attachment I) with all the information that is requested and assess which risk classification the interaction with the third party will be classified under, based on the guidelines of this policy.

The due diligence process needs to be integrated, ensuring that knowledge is shared between Mac Jee's areas. Before starting the due diligence process, employees should check that a valid certificate does not already exist for this interaction with the third party, avoiding rework.

Depending on the risk identified by the applicant, different steps must be followed until the third party is certified. These steps are described in the sections below.

4.2.1 Carrying out medium-risk due diligence

The requesting employee must complete due diligence questionnaire 01 (Attachment I) and, in addition, must send due diligence questionnaire 02 (Attachment II) for the third party to complete with the necessary information. Once the two questionnaires have been completed, the employee must send the medium-risk due diligence request to the Legal department.

The Legal department will review the information provided and may return to the applicant if it finds any inconsistencies in the documentation sent. The Legal department must also assess whether there are any red flags relating to the third party being assessed. All red flags found during the due diligence process must be dealt with, documented and filed along with any additional documentation from the third party. All mitigation actions proposed to reduce the likelihood of any risk materializing, those responsible for carrying out these actions and the rationale for continuing the relationship with the third party despite the red flag found should also be documented.

Based on the red flags found, the Legal department may deem a more detailed analysis necessary. If this is the case, it should advise the requesting employee to follow the high-risk due diligence process.

Also based on the red flags identified during the analysis, the Legal department may not agree or may have reservations about hiring the third party. In this case, the decision on whether or not to recommend approval should be taken to the Ethics Committee.

If, from an integrity point of view, the relationship with the third party has a favorable recommendation from the Legal department, it must complete the due diligence certificate for the third party (Attachment IV). The certificate must be forwarded to the Manager of the requesting area for final approval.

The certificates issued and approved, as well as all supporting documentation collected and analyzed, must be stored by the Legal department. If the Manager of the requesting area does not approve the third party's certification, Mac Jee will not be able to start or continue the relationship with the third party.

Medium-risk due diligence certificates will be valid for two (02) years.

4.2.2 Carrying out High Risk Due Diligence

For all requests for high-risk analysis, the requesting employee must complete the due diligence questionnaire 01 (Attachment I), and send the questionnaire 02 (Attachment II) and the term of commitment (Attachment III) for completion by the third party. Once all three documents have been reviewed and filled in correctly, the requesting employee must send the request to Mac Jee's Legal department.

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The Legal department will review the information provided and may return to the applicant if it finds any inconsistencies in the documentation sent.

For high-risk cases, the Legal department must justify its decision to approve or reject the relationship with the third party, presenting all the main risks and red flags of the relationship, as well as proposals and action plans to mitigate these risks, such as including additional clauses in the contract with the third party and implementing compliance actions by the third party, for example.

In order for the Legal department to support its justification, some additional steps may be necessary, such as:

- Requesting detailed investigation results on the third party, which may be through investigative firms, a due diligence service provider or law firms;
- Requesting confirmation of the sufficiency of the third party's integrity program, including communications and training that have been carried out on this subject;
- Request business recommendations from the third party;
- Request interviews with key employees at the third party.

Based on the Legal department's justification, the third party's certificate must be approved by the Manager of the requesting area and endorsed by Mac Jee's CEO. Depending on the case, the CEO may also request that it be evaluated by the Ethics Committee before approving any decision.

For sales representatives, due diligence must be approved by the CEO, as described in the Commission Payment policy. For further details on hiring sales representatives, please refer to this policy.

Only after approval in all the stages described in this policy can Mac Jee start or continue the relationship with the third party. The certificates issued, as well as all documentation of the analysis and approvals carried out, must be stored by the Legal department.

Based on the risks identified during the analysis carried out, the CEO may also disapprove Mac Jee's relationship with the third party. If this is the case and the requesting area has any considerations in relation to the opinion, it may ask Mac Jee's Ethics Committee for a new analysis of the case, presenting the justifications for such a review.

High-risk due diligence certificates will be valid for one (01) year from the date of endorsement by the CEO.

4.2.3 Donations and Sponsorships

In the case of donations and sponsorships, the requesting employee must send the completed due diligence questionnaire 01 (Attachment I) to the Legal department, which must review the consistency of the data filled in and the possible risks that the relationship presents for Mac Jee.

If necessary, the Legal department may request additional information from the entity receiving the donation and/or sponsorship from Mac Jee, such as, but not limited to:

- Whether the entity is for-profit or not-for-profit;
- List of shareholders, Board members and executives of the recipient;
- References to the recipient's reputation and performance; or

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- Detailed budget of how the donation and/or sponsorship will be used by the recipient.

All red flags found during the due diligence process must be duly addressed and documented. If the Legal department does not identify any red flags that prevent the donation or sponsorship from being made to the third party, it can approve the due diligence.

It is important that, in these cases, the Legal department documents in the due diligence the recommendation for continuous monitoring after the donation or sponsorship has been made, to ensure that its proper purpose has been achieved.

As established in the Anti-Corruption policy, after the due diligence has been approved, each donation or sponsorship must also be approved by the Ethics Committee, which will also take into account the analyses carried out during the third party's due diligence process.

Due diligence certificates for donations and sponsorships will be valid for one year, but each new transaction must be approved again by Mac Jee's Ethics Committee.

4.3 Summary of Roles and Responsibilities

The table below is intended to summarize the steps and responsibilities described above for third-party certification, according to the risk level of the relationship:

For Third Parties in General	
Stages of the Due Diligence process	Responsibility
1. Complete the due diligence questionnaire 01 and classify the level of risk	Requesting employee
Due Diligence Process for Medium Risk Third Parties	
Stages of the Due Diligence process	Responsibility
2. Ask the third party to complete due diligence questionnaire 02 (attachment II).	Requesting employee
3. Send duly completed questionnaires 01 and 02 to the Legal department.	Requesting employee
4. Check that the risk level classification and the information filled in on questionnaires 01 and 02 are correct. If there is an inconsistency in filling in the documentation or if the third party needs to undergo a more detailed analysis (high risk), return it to the requesting employee to make the adjustments.	Legal Department

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<p>5. Carry out an integrity assessment of the third party, issuing a favorable recommendation or not for the relationship between Mac Jee and the third party.</p> <p>If the recommendation is favorable, complete the due diligence certificate for the third party (attachment IV) and send it to the Manager of the requesting area for final approval.</p> <p>If there are reasons not to recommend hiring the third party, send the case to the Ethics Committee for evaluation..</p>	Legal Department
<p>6. Based on the information provided by the applicant and the Legal department, approve or reject the certificate and inform the Legal department of the decision.</p>	Manager of the Requesting Area
<p>7. Inform the requesting employee of the final decision and file documentation generated in the process.</p>	Legal Department
<h3 style="text-align: center;">Due Diligence Process for High Risk Third Parties</h3>	
Stages of the Due Diligence process	Responsibility
<p>2. Ask the third party to complete the 02 (attachment II) and the term of commitment (attachment III).</p>	Requesting employee
<p>3. Send the completed questionnaires and terms of reference to the Legal department.</p>	Requesting employee
<p>4. Evaluate the information and documents sent by the requesting employee and, if necessary, request additional documentation or independent analysis/investigation by a third-party company.</p>	Legal Department
<p>5. Draw up a document recommending or not establishing a relationship with the third party, including all the reasons justifying the recommendation.</p> <p>Send the recommendation to the Manager of the Requesting Area for approval.</p>	Legal Department
<p>6. Com base nas informações providas pelo ased on the information provided by the applicant and the Legal department, approve or reject the certificate.</p> <p>If approved, the certificate should be sent to the CEO for approval.</p>	Manager of the Requesting Area

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<p>7. Endorse the Legal department's justification or ask for the due diligence to be assessed by the Ethics Committee.</p> <p>Send the final decision to the Legal department.</p>	Board of Directors
<p>8. Inform the requesting employee and file all documentation, analysis rationale and approvals.</p>	Legal Department
Due Diligence Process for Donations and Sponsorships	
Stages of the Due Diligence process	Responsibility
<p>2. Check the consistency of the information filled in. If there is an inconsistency in filling in the documentation, return it to the requesting employee to make the adjustments.</p> <p>Request additional information, if deemed necessary, such as a list of shareholders and Board members of the third party.</p>	Legal Department
<p>3. Carry out an integrity assessment of the third party, approving or rejecting the relationship between Mac Jee and the third party.</p> <p>If the relationship is approved, issue a due diligence certificate to the third party (attachment I).</p>	Legal Department
<p>4. Inform the requesting employee of the final decision, provide the due diligence certificate (if approved) and file documentation generated in the process.</p>	Legal Department

4.4 Third Party Post-Certification Monitoring

As a result of the analysis carried out, the Legal department can recommend monitoring actions and action plans to mitigate any risk or red flag found. It is the responsibility of the requesting employee to follow up on the corrective measures and action plans indicated by the Legal department, as well as to monitor compliance with the respective agreed deadlines.

Any inconsistencies identified, such as the impossibility of implementing any corrective action or delays in meeting any deadlines, must be reported to the Legal department in good time. Based on this information, the Legal department may require a new due diligence analysis of the third party or the cancellation of the current certificate, if necessary.

4.5 Renewal of Due Diligence Certificates

It is the responsibility of the requesting employee to apply for renewal of the due diligence certificate at least 30 days before the certificate expires. All stages of the due diligence process must be followed again, as defined in the previous sections. If the renewal request is not made, the certificate will cease to be valid after its expiry date.

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The due diligence certificate may be renewed before its expiry date if any red flag is found or any situation occurs that alters the initial analysis carried out by Mac Je.

4.6 Companies with Multiple Certificates

The due diligence of the third party is carried out based on the type of relationship it will have with Mac Jee. Therefore, it is possible for the same third party to have multiple due diligence certificates if they have different types of relationships with Mac Jee, classified with different levels of risk.

Before establishing any new relationship with a third party, employees should consult the repository of issued certificates to check whether the third party already has a valid certificate, consistent with the risk level of the activity. If the third party has a valid certificate, but the risk level of this certificate is lower than that presented by the new relationship with the third party, a new due diligence must be carried out to capture the risk level of this new relationship.

4.7 Controls over payments

Before making any payment, Treasury must check whether the entity to which the payment is being made has a valid due diligence certificate for the type of service or product being paid for or whether it is exempt from the due diligence process. If the entity does not have a valid due diligence certificate, the payment must be approved in advance by Mac Jee's Legal department.

In cases where the third party has more than one type of interaction with Mac Jee, Treasury must check that the risk level of the due diligence certificate issued to it covers the payment to be made. If the certificate issued to the third party is of a lower risk than that required for the type of service or relationship being paid for, the payment must also be approved by the Legal department.

5. Communications and Training

It is the responsibility of the Legal department to provide periodic training on this policy for all employees involved in the due diligence process, in order to ensure the efficiency of the process. If in doubt about any stage of the due diligence process, the Legal department should be consulted.

6. References

- Code of Ethics and Conduct;
- Anti-Corruption Policy;
- Commission Payment Policy.

7. Attachments

7.1 ATTACHMENT I - Due Diligence Questionnaire 01

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Due Diligence
Questionnaire01.docx

7.2 ATTACHMENT I - Due Diligence Questionnaire 02



Attachment II - Due
Diligence
Questionnaire02

7.3 ATTACHMENT III – Term of Commitment



Attachment III -
Term of
Commitment.docx

7.4 ATTACHMENT IV – Due Diligence Certificate



Attachment IV - Due
Diligence
Certificate.docx

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