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1. Purpose

The Ethics Committee is an advisory and deliberative body that analyzes situations involving ethical and conduct conflicts. It is responsible for making the final decisions on issues involving integrity in Mac Jee's operations. This charter outlines how the Committee works, its composition and responsibilities.

2. General Information

RESPONSIBLE	Legal Department
STORAGE	Computerized system
DISTRIBUTION	Electronic 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

“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.

“Due Diligence”: The process of analyzing information and documents of a certain 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.

4. General Guidelines

4.1 Mission

The mission of the Ethics Committee is to promote an ethical and transparent culture at Mac Jee, both with its employees and with the third parties who work with it.

The Ethics Committee is also responsible for ensuring that the Code of Ethics and Conduct is upheld, promoting awareness of it at all hierarchical levels and disseminating the values, principles and guidelines contained therein.

4.2 Responsibilities

The Ethics Committee will have the following responsibilities:

- Act as an advisory, independent and permanent body for receiving, analyzing and dealing with situations involving ethical conflicts;
- Promote the dissemination of Mac Jee's Code of Ethics and Conduct, both to its employees and to third parties who will have interactions with Mac Jee or on its behalf;
- Serving as a guide and support for all Mac Jee employees in resolving situations that require it;
- Manage Mac Jee's conduct channels;
- Carrying out the final review of internal investigation reports;
- Decide on the disciplinary measures to be applied to employees and third parties who infringe the Code of Ethics and Conduct, in accordance with current legislation and the penalty rule set out in the Disciplinary Measures policy. In the case of recommendations issued by the investigator of the report, it will be up to the Committee to agree with the recommendation made or to propose any adjustments. For decisions of this nature, all members of the Committee must be present and the measure must be approved by a simple majority of votes;

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- Analyze requests for approval of due diligence cases, if there is no agreement between the Legal department, which carries out the analysis, and the requesting area;
- Evaluating possible cases of conflicts of interest that may be referred to the Committee for a final decision;
- Monitoring the application of disciplinary measures and other corrective actions approved and/or proposed by the Committee, to ensure that situations are regularized;
- Reviewing the Code of Ethics and Conduct whenever it sees fit and proposing changes when necessary;
- Propose the creation of new policies and procedures that will corroborate compliance with the principles, values and guidelines contained in the Code of Ethics and Conduct;
- Monitoring Mac Jee's general situation with regard to possible occurrences of acts that deviate from the principles contained in the Code of Ethics and Conduct;
- Keeping all information handled by the Committee confidential.

4.3 Composition

Mac Jee's Ethics Committee must be made up of three (03) members, two (02) permanent members and one (01) rotating member.

The two permanent members of the Ethics Committee shall be the Chief Executive Officer and the head of the Legal department. The head of the Legal department will also act as Coordinator of the Ethics Committee.

The rotating member shall be appointed by the Chief Executive Officer of the Mac Jee Group for a term of one year, with re-election permitted. The rotating member must be chosen from among the Group's employees who hold the position of Board member or higher.

The positions on the Ethics Committee cannot be delegated to other people, so the three members cannot nominate people to take their place. In the event of the temporary or permanent absence of any of the committee members, it will be up to the Chief Executive Officer to appoint a replacement, if the vacant position is a rotating one. If any permanent position is vacant, it will be up to the other two members of the Committee to temporarily choose a new member to join them, until the vacancies of the Chief Executive Officer or the head of Legal are filled.

4.4 Committee procedures

The Ethics Committee shall meet ordinarily once a month. However, any member of the Committee may request an extraordinary meeting to discuss a specific matter that is urgent or that could cause Mac Jee some kind of damage if not dealt with in a timely manner.

In order to ensure the smooth running of the committee, the following guidelines must be followed:

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- The agenda for the meeting should be distributed by the Committee Coordinator to the other members no later than 7 days in advance;
- The materials relating to the issues to be discussed that require prior study and reflection must be made available by the Committee Coordinator to the other members at least 7 days in advance;
- All decisions must be taken by a simple majority of the three Committee members. If, for some reason, not all the members are present, and there is a tie in any decision, the resolution must wait for the next Committee meeting to take place;
- The resolutions of the Committee meetings must be recorded in minutes, copies of which will be filed by the Legal department;
- The Committee may invite both internal and external employees to attend meetings, in order to assist in the preparation of opinions, minutes and supporting documents. In all cases, additional people should only be invited if their participation is really necessary. Those taking part must undertake not to divulge any information they become aware of during their participation in the Ethics Committee's activities;
- The Committee may, if necessary, engage the services of external and independent companies to assist in the decision-making process or to investigate complaints received.

4.5 Communication channels with the Committee

All violations of the Code of Ethics and Conduct or of Mac Jee's principles, values and guidelines must be reported by employees through the Mac Jee Group's contact channel at <http://macjee.com.br/contato/>. Identification of the person making the report is optional and, if so, will be preserved. Reports will be investigated, and if they generate any suggestion of disciplinary action for any of Mac Jee's employees, they will be evaluated by the Ethics Committee before any action is taken.

5. References

- Code of Ethics and Conduct;
- Anti-Corruption Policy;
- Conflict of Interest Policy;
- Third Party Due Diligence Policy;
- Disciplinary Measures Policy..

6. Attachments

None.

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