


<b>Number: PL.00.13</b>	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review: 00</b>	Anti-corruption policy	
<b>Date: 12/03/2020</b>		

## 1. GOALS

green4T Participações S.A. and subsidiaries ("green4T Companies") shall commit themselves to conducting their business lawfully, ethically, transparently and professionally.

This policy establishes guidelines, standards and procedures for the anti-corruption program so that green4T Companies comply with the Brazilian Anti-Corruption Law (Law No. 12.846/2013, regulated by Federal Decree No. 8.420/2015), with the US FCPA - Foreign Corrupt Practices Act, and/or any existing law or regulation that specifically addresses this matter of any country in which the green4T Companies operate. Although the specific provisions of laws may be different in each country where we do business, the anti-corruption essence of such laws is always the same.

## 2. SCOPE

Departments and Companies: Mandatory rule for all employees and management members (Officers and Directors) of green4T Participações S.A. and subsidiaries ("green4T Companies").


## 3. RESPONSIBILITIES

### 3.1. ALL

It is the responsibility of all to know, disseminate and ensure compliance with the rules and guidelines contained in this policy.

This policy must be complied with even when, in certain respects, the applicable local legislation is less strict than the terms contained herein.

If you have any questions about the content of this policy and its application, please contact the Legal Department or the Compliance Department of green4T Companies.


Number: PL.00.13	<b>MANAGEMENT SYSTEM POLICY</b>	
Review: 00	Anti-corruption policy	
Date: 12/03/2020		

## 4. POLICY


### 4.1. TERMS AND EXPRESSIONS

Term	Description
<b>Management member(s)</b>	When in the singular form, means the Statutory Officers and the members of the Board of Directors individually or, when in the plural form, the Statutory Officers and the members of the Board of Directors collectively.
<b>Employee(s)</b>	Employees hired under an employment contract and under the law that governs employment relationships where the work is performed, as well as interns, young apprentices and temporary employees.

<b>Third-party Intermediary(ies)</b>	Refers to professionals who are not Employees and/or Management Members and who interact with Public Officials on behalf or in the interest or benefit of green4T Companies, such as service providers, business partners (sales representatives or partners in a consortium), prosecutors, brokers, etc.
<b>Third parties</b>	Professionals who are not Employees and/or Management Members, but work for green4T Companies.
<b>Related person(s)</b>	People related to a Public Official for any reason, including, without limitation to, members of the family or relatives of the Public Official, such as spouse, partner, siblings, parents, children or stepchildren, grandparents, grandchildren, children-in-law, uncles/aunts, nephews/nieces, siblings-in-law, and father/mother-in-law.

<b>Number: PL.00.13</b>	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review: 00</b>	Anti-corruption policy	
<b>Date: 12/03/2020</b>		

<b>Undue Advantage</b>	The word "Undue advantage" should be interpreted in its broad sense and includes any item (tangible or intangible) that have value or that could generate a benefit or business advantage to the recipient, including (without limitation to) cash, cash equivalents (such as gift card or gift voucher), gifts, travel, excessively expensive meals, tickets, entertainment, hospitality, accommodation, sponsorship, goods or services, loans, donations, discounts not available to the public in general, insider information, scholarship, and job offer or promise of a job.
<b>green4T Companies</b>	All the companies that make up green4T, i.e. all subsidiaries, associates and affiliates with equity interest in Brazil and abroad.
<b>Corruption</b>	Abuse of power or authority committed by a person to gain advantage for himself/herself. The most common form of corruption is bribery.
<b>Bribery</b>	Consists of offering, giving, receiving something of value in exchange for favorable treatment by a company, official authority or public servant.


<b>Number:</b> PL.00.13	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review:</b> 00	Anti-corruption policy	
<b>Date:</b> 12/03/2020		

<b>Term</b>	<b>Description</b>
<b>Public Official(s)</b>	Any person who: (i) even if temporarily or without compensation, holds a position, job or public role in any Public Administration agency or entity, or in a company engaged by or commissioned to perform an activity under a concession granted by the Public Administration; (ii) holds a position, job or role in public or government-controlled companies, including mixed capital companies, as well as public foundations; (iii) is a member of a political party or a candidate to a political office; and (iv) holds a position, job or public role in government agencies, entities or in diplomatic missions of a foreign country, as well as in legal entities controlled, directly or indirectly, by the government of a foreign country, or in international public organizations. Health Professionals can be considered Public Employees, when, for example, they work in any direct or indirect Public Administration entity, including public hospitals or universities, even if temporarily or without compensation.
<b>Active Corruption</b>	Offer or promise to offer undue advantage to a Public Official, inducing him/her to practice, omit or delay an official act.
<b>Passive Corruption</b>	A Public Official who requests or receives, for himself/herself or for another person, either directly or indirectly, although outside his/her position or prior to taking it, but by virtue of his/her position, any undue advantage, or accepts the promise of such an advantage.
<b>Money Laundering</b>	Set of business or financial transactions that seek to incorporate into the economy any resources, goods and services that originate from, or are related to illegal acts.

#### **4.2. RELATIONSHIP WITH PUBLIC OFFICIALS**

The relationship with Public Officials must be guided by ethics and transparency. Management Members and Employees of green4T Companies will contact Public Officials only when necessary, and at the premises of the respective public agencies and/or at green4T Companies' facilities, in performing their duties. In the latter case, whenever possible, in the presence of two or more professionals of green4T Companies. This rule must also be followed by Third-Party Intermediaries.

It is strictly forbidden to bribe, promise, offer or give, either directly or indirectly, any Undue Advantage to national or foreign Public Employees or Related Persons.

<b>Number: PL.00.13</b>	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review: 00</b>	Anti-corruption policy	
<b>Date: 12/03/2020</b>		

The prohibition provided for in this policy is applicable to the conduct of green4T Companies or of any Third-Party Intermediaries, either a natural or legal person.

The prohibition expressly contained in this policy also applies to payments that are intended to speed up or facilitate Public Officials' routine practices (e.g. issue of licenses, permits or authorizations; inspections or visits) (known as 'facilitation payment', 'grease payment' or 'speed payment').

Such payments are expressly prohibited by this anti-corruption policy and may not, under any circumstances, be made directly or through any Third-Party Intermediaries.

Payments of additional fees to speed up routine processes will only be allowed if expressly provided for by law and through official means, paid directly to the public agency (through appropriate payment forms) and never to a Public Official or intermediary, and provided that previously and formally approved by the Legal and Compliance departments of green4T Companies.

#### **4.3. BIDS**

green4T Companies and its Management Members, Employees and Third-Party Intermediaries must strictly comply with all local laws and regulations applicable to contracts with the Public Power. Everyone must act in accordance with the highest ethical standards and within the law when interacting with Public Officials and competitors in the context of a public tender or other means of public procurement.


They are prohibited from engaging, either directly or indirectly, in any act that could be construed as defrauding or hampering bids, removing or seeking to remove competitors in a public bidding procedure, or performing any act that harms the Public Administration. If you have any doubt about how to relate with Public Officials, government agencies or competitors in the context of bids or public contracts, please contact the Compliance department.

#### **4.4. HOSPITALITY, MEALS, GIFTS AND PRESENTS**

green4T Companies do not allow paying for hospitality, meals, entertainment (tours, sports events, concerts, among others) to any Public Official or Third Party, with the purpose of improperly influencing or compensating an act or decision, as an actual or intended compensation for any personal benefit or for the benefit of the Company.

green4T Companies

do not permit payment of expenses relating to travel, meals, entertainment or other business courtesies, provided that they are closely related with the Company's business, are consistent with the local law and comply with the limits established by the Company.

<b>Number: PL.00.13</b>	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review: 00</b>	Anti-corruption policy	
<b>Date: 12/03/2020</b>		

Expenses will only be reimbursed upon submission of a completed **F.00.07** containing the approvals of the Chief Commercial Officer and the Compliance Manager.

The persons directly involved in professional affairs alone are allowed to invite for meals (invitations to the guest's spouse, relatives and friends are prohibited).

#### **4.5. RELATIONSHIP WITH THIRD PARTIES**

It is strictly prohibited to bribe, offer or authorize, either directly or indirectly, any proposal, promise of payment or payment in cash, or by means of Undue Advantage, to any employee, agent or representative of a private company that has (or may have) a business relationship with green4T Companies, in order to attempt to obtain undue interests or to induce such employee, agent or representative to make any decision that may benefit green4T Companies.

**4.6. RESPONDING TO UNDUE PAYMENT REQUESTS** If you receive a request for any usual payment or Undue Advantage made by any Public Official, Related Person or Third Party, refuse it explicitly and definitely, and promptly notify your immediate superior and the Compliance Manager.

#### **4.7. DONATIONS AND SPONSORSHIP**

Any donation or sponsorship must be conducted transparently and in line with the legislation in force.


All donations made to political parties and/or candidates to public offices should follow the strictest legal and ethical standards, and must necessarily be in accordance with the requirements and limits established in the local legislation. No Employee is allowed to use green4T Companies or private resources for donations to political parties, election campaigns or candidates to public offices on behalf of the Company, without the prior approval of the Chief Executive Officer and the Chief Financial Officer, and validation by the Legal or Compliance department.

Sponsorships should be based on agreements formalized between green4T Companies or any company that is part of its economic group, and the institutions that will receive the sponsorship.

green4T Companies have an internal process for approving such sponsorships, and, when necessary, they must be approved in accordance with the effective approval policy or by the Chief Executive Officer together with the Chief Financial Officer, and validated by the Legal or Compliance department.

#### **4.8. CONTRIBUTIONS AND CHARITIES**

The green4T Companies' policy determines that contributions, sponsorships or donations to charitable causes should not be made in exchange for favors from any Public Official, even if the recipient is a genuine philanthropic institution.

<b>Number: PL.00.13</b>	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review: 00</b>	Anti-corruption policy	
<b>Date: 12/03/2020</b>		

Contributions made to Institutions in which a Public Official or a member of his/her family has a public role, or made at the behest of a Public Official, may raise suspicions of corruption.

Donations should be made only for legitimate philanthropic purposes, for instance, for humanitarian, cultural or educational purposes. Donations in exchange for favors to the Company by a Public Official will not be allowed.

The approval of contributions, sponsorships or donations must comply with the current approval policy and follow the procedure below:


1. Requests must be in writing, specifying at least the person or organization that is requesting the contribution, the purpose of the contribution, and the amount requested;
2. The requests will be carefully analyzed in order to check whether the contribution will not provide personal benefit to any Public Official and whether the institution is registered in accordance with the applicable local legislation;
3. Contributions must be made to institutions and not to individuals, and under no circumstances will the payment be made in cash, or through deposit in a personal checking account;
4. The contributions will be previously approved by the Vice Presidents and the Chief Executive Officer, and validated by the Legal or Compliance department;
5. A proof of receipt of any contribution made to a charitable cause is mandatory.

#### **4.9. ENGAGING THIRD-PARTY INTERMEDIARIES**

No Third-Party Intermediaries shall exercise inappropriate influence over Public Officials and must not be appointed by Public Officials.

green4T Companies should check whether any such Third-Party Intermediaries are known for engaging in corruption, or whether they are under investigation, or have been prosecuted or condemned. In such case, green4T Companies must verify the facts and decide based on results, taking into account the risk of damaging their reputation.

Before doing business with green4T Companies, all Third-Party Intermediaries must undergo an analysis intended to check their history, structure, relationship with Public Officials, reputation and qualification to perform the work for which they would be engaged. The review process can be performed independently or

<b>Number: PL.00.13</b>	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review: 00</b>	Anti-corruption policy	
<b>Date: 12/03/2020</b>		

together with the Third-Party Intermediary, which must cooperate and provide all the information that green4T Companies deem necessary.

The Third-Party Intermediary must certify that it will comply with the Brazilian Anti-Corruption Law No. 12.846/13, the US FCPA - Foreign Corrupt Practices Act, and all anti-corruption laws of the countries in which it operates.

Any new contracts and existing contract renewals must be previously justified. Contracts with Third-Party Intermediaries must contain a description of the services, amounts charged, as well as clauses that ensure compliance with anti-corruption laws, in order to mitigate the risk of illicit payments, and to provide the Company the means to terminate the relationship in the event of any violations.

#### **4.10. MERGERS, ACQUISITIONS AND CORPORATE RESTRUCTURINGS**

green4T Companies take measures to check whether the company with which they are involved, by virtue of mergers, acquisitions or corporate restructurings, has been or is involved in acts that may harm the public administration, and whether it has vulnerabilities that entail risk to its integrity.

#### **4.11. ACCOUNTING CONTROLS**

All Management Members and Employees are responsible for ensuring that the records of all expenses, transactions and payments of green4T Companies are accurate and complete.

Making false or inaccurate records that conceal the nature or the correct amount of any transaction is strictly forbidden. No unofficial or unrecorded fund or account may be created or kept without a purpose, and no false, misleading or inaccurate entry may be made in the accounting books and records of green4T Companies.

#### **4.12. PENALTIES**


All employees are responsible for reporting any violation and suspected violation of local anti-corruption laws, particularly the Brazilian and US laws, as stated in this policy.

Any communication of violation, either identified or anonymous, should be submitted to the Compliance department of green4T Companies, through the email address [canaldaetica@green4T.com](mailto:canaldaetica@green4T.com), or telephone number 55 11 96850.3293, or through the whistleblower hotlines on green4T websites.

Measures will be taken to protect the confidentiality and anonymity of any report.

The green4T Companies not will allow or tolerate any kind of retaliation against any person making a complaint in good faith or reporting a violation of this policy.



<b>Number: PL.00.13</b>	<b>MANAGEMENT SYSTEM POLICY</b>	
<b>Review: 00</b>	Anti-corruption policy	
<b>Date: 12/03/2020</b>		

Any employee involved in retaliation will be subject to the Company's disciplinary measures, including termination of the employment contract.

Any violation to this policy may result in severe civil and criminal penalties to green4T Companies and to the Employees and/or representatives involved. Individuals and executives are subject to criminal penalties, as well as to fines in case of violation of Law No. 12846/13 or the FCPA, which will not be paid by the Company.

In addition to the penalties imposed by law, violations of the anti-corruption policy could be punished using the following disciplinary measures, depending on the type and seriousness of the violation: Formal Warning; Training on Good Practices (Compliance); Loss or reduction of variable compensation; Transfer to another position; Suspension; Termination with or without notice.

## 5. REFERENCE DOCUMENTS

**F.00.07** – Authorization to Offer Hospitality, Meals and Entertainment\_green4T

## 6. RECORD CONTROL

N/A.

## 7. REVISION HISTORY

Revision	Date	Description of amendment	Approved by the Manager	Approved by Management and Quality
00	12/03/2020	The policy was separated. New sequential numbering.	Vaner Silva	Vaner Silva