

### 1. PURPOSE

This Anticorruption Policy has the purpose of ensuring the compliance with the Anticorruption Laws and other guidelines established herein by all the Staff Members, as well as by Third Parties acting in favor or to the benefit of Enauta. We try to ensure that, with the adoption of the highest standards of integrity, legality, and transparency, we may ensure that each and every business in which Enauta participates will be free from Corruption and that it is not involved or used for the practice of Money Laundering or Corruption crimes.

### 2. SCOPE

This Policy applies to Enauta Participações S.A. and its subsidiaries ("Enauta" or "Enauta Group") and must be known and complied with by all its Staff Members in their relationships with clients, Third Parties, and Public Agents.

### 3. DEFINITIONS

**"Government"** - must be understood in its broadest sense, including all bodies of the Executive, Legislative, and Judiciary Powers, government entities, government owned companies, government controlled companies, and public foundations, national or foreign, including, for example, ANTAQ, INEA, Navy, Labor Court; (ii) companies belonging or controlled by the government, including, for example, BNDES, Caixa Econômica Federal, Petrobras; (iii) international public organizations, such as Maritime and Customs Authorities of other countries or also supporting and financing bodies. For the purposes of this policy, the private companies performing public services through concession, authorization, or permission, international public organizations, and political parties are included in the meaning of Government. In case of doubts, adopt the broadest and most conservative definition or consult with the Compliance Department.

**"Public Agent"** – means everyone who exercises public functions, even if temporarily or without compensation, by election, appointment, designation, engagement, or any other form of investiture or relation, term, office, employment, or function in the entities of the direct, indirect, or foundational administration of any of the power of the Federal Government, States, Federal District, Municipalities, including government entities, government owned companies, government controlled entities, international organizations, candidates for political offices in any level, members of political parties, members of the Executive, Judiciary, or Legislative Powers. Additionally, any individual who works for a company providing services through contract or agreement for the execution of an activity which is typical of the Government. The following are examples of Public Agents: police officers, firefighters, tax inspectors, municipality inspectors, sanitary surveillance agents, civil servants of the office of the Secretary of Finance and Urbanism, workers of CET – RIO, Process Servers, civil servants at the service of the Courts and members of the Prosecution, among others. Additionally, the definitions of public servants provided for in

Articles 327 and 337-D of Decree-Law n. 2,848/1940 (“Brazilian Penal Code”) are adopted as reference.

For the purposes of this Policy, individuals who perform or have performed, in the last five years, in Brazil or in foreign countries, territories, and foreign dependencies, relevant offices, employments, or public functions, as well as their representatives, family members, and strict Staff Members are equivalent to Public Agents.

**“Staff Members”** – means members of the Board of Directors and its advisory committees, members of the Supervisory Board, officers, employees, interns, and outsourced workers of Enauta.

**“Conflict of Interests”** – means every situation which represents a confrontation between the personal interests of a Staff Member and the interests of Enauta which may, in a concrete or apparent manner, compromise or influence, in an inadequate manner, the performance of the functions of the respective Staff Member, to the detriment of the interests of Enauta.

**“Corruption”** – in this Policy the term is used in a broad sense, including the crimes of active or passive corruption themselves, the act or attempt to use one’s position of power to, through abuse or deviation, achieve an advantage for oneself or for others, to whomever this person is representing or wants to benefit, as well as the other damaging acts listed in Article 5 of Law n. 12,846/2013.

**“Anticorruption Due Diligence”** – diligence and measures to assess the reputation, financial situation, background of ethical conduct, and the experience of the potential partner, which will vary according to the potential risk presented by the service provider due to his or her activity.

**“Family members”** – spouse, cohabitants, or relatives, by blood or by marriage, direct or collateral, to the third degree (e.g.: father, mother, children, grandparents, grandchildren, nieces and nephews, uncles and aunts, parents-in-law, and siblings-in-law).

**“Anticorruption Laws”** – set of laws and regulations which apply to the prevention and fight against corruption in Brazil, especially the Brazilian Penal Code (Decree-Law n. 2,848/1940), the Law of Misconduct in Public Office (Law n. 8,429/1992), and the Anticorruption Law/ Clean Company Law (Law n. 12,846/2013).

**“Money Laundering”** – the process which aims at disguising the nature and the source of the money associated with an illegal activity, introducing these amounts in the economy, through the integration of illegal money with the business flow, so as to appear to be lawful or for its true source or owner not to be identified.

**“Bribery”** – to offer, give, request, or receive money, gift, present, or another advantage as a form of inducement to the performance of any action, omission, influence, or undue advantage



or illegal act or act of break of trust in the performance of one's functions. The offer of any advantage, including, but not limited to, favors, jobs, internships, conveniences, gifts, or favorable opportunities directly or indirectly provided to the persons who may benefit from the businesses of Enauta may be considered forms of bribery.

**“Third Parties”** – means representatives, suppliers, service providers, and other third parties at the service of Enauta or acting in its name.

**“Undue Advantage”** – means any benefit, even if not economic, gifts, entertainment, air tickets, lodging, donations, sponsorship, amounts in cash or equivalent (cryptocurrency, tickets, mileage), offered, promised, or delivered directly or indirectly to a Public Agent. If offered with the purpose of unduly influencing or improperly rewarding any act, decision, or omission of a Public Agent, in addition to being a violation of this Rule, the act may be considered the crime provided for in Article 333 of the Brazilian Penal Code.

For the purposes of this policy and in accordance with the Anticorruption Laws, the delivery, offer, or promise of an Undue Advantage, as defined below, to Family Members of the Public Agent, such as parents, children, spouse, cohabitant, stepchildren, siblings, and nephews and nieces of the Public Agent is equivalent to the offer of Undue Advantage to the Public Agent himself.

## 4. BASIC PRINCIPLES

Enauta complies with the Anticorruption Laws and works for its business partners, suppliers, and service providers to share this commitment.

Enauta performs its activities in accordance with the national and foreign applicable laws regarding the fight against Money Laundering and condemns each and every form of Corruption, direct or indirect, both in its public relations (transactions directly or indirectly involving the Government) or in its private relations (transactions with private companies with no involvement of governmental entities).

The practice of Corruption is forbidden and is considered a serious violation of this Policy and of the Code of Ethical Conduct of Enauta, therefore:

- Do not offer or accept Bribes or any other form of Undue Advantage;  
Keep accounting records and documentation which correctly reflect the transactions made and which ensure that Enauta's assets are not illegally used; and  
Know whomever Enauta makes business with, be they clients, partners, suppliers, or service providers, following the Anticorruption Due Diligence procedures established in the Procedures of the Supplies Department (Management of Suppliers and Management of Contracting), in the Procedure of Sponsorships, Institutional Supports, and Philanthropic Donations, and in the Partnership Establishment Policy.

## 5. SUMMARY OF THE MAIN EXPECTED CONDUCTS AND PROHIBITIONS

Enauta does not tolerate any anti-ethical or illegal conduct by its Staff Members or Third Parties in its name or in its benefit;

- It is forbidden to promise, offer, pay, or deliver, directly or indirectly, any Bribe or any other Undue Advantage to a Public Agent, Close Person, or related third person, in or out of Brazil;
- The prohibition above includes any offer, promise, or payment which has not been established by law, or gifts, of any value, to Public Agents or Third Parties, with the purpose of accelerating or achieving an advantage or favorable situation in proceedings for permits, licenses, authorizations, or in the processing and analysis of administrative proceedings in general (internationally denominated facilitation payments);
- It is forbidden to receive or to accept Bribes;
- The Staff Member must know whomever Enauta makes business with, always following the Anticorruption Due Diligence procedures established in the Procedures of the Supplies Department (Management of Suppliers and Management of Contracting), in the Procedure of Sponsorships, Institutional Supports, and Philanthropic Donations, and in the Partnership Establishment Policy;
- The accounting records and supporting documentation must faithfully reflect the transactions made by Enauta, to ensure that its assets are not unduly used;
- It is forbidden to finance, sponsor, pay for, or in any other form support the practice of illegal acts and irregularities;
- It is forbidden to use mediators or “dummies” with the purpose of hiding or dissimulating the interests of Enauta, in relation to any claim, demand, or management before the Government;
- It is forbidden to create obstacles to investigation or internal audit activities, as well as investigations or inspections by public agencies, including the regulatory agencies and the financial system agencies; and
- Any contributions or donations to political parties, political campaigns, and/or candidates for public offices are forbidden to the Staff Members in the name of Enauta.

## 6. GUIDELINES

### 6.1 UNDUE ADVANTAGES

In their relationship with the Government or other counterparties, the Staff Members must abstain from promising, offering, delivering, or yet authorizing the offer or delivery, directly or indirectly, of any Undue Advantage, either with the purpose of influencing decisions affecting Enauta’s businesses, or for the personal gain of the Staff Members or their Family Members.

No Staff Member shall be punished due to delay or loss of business as a result of his or her refusal in offering or delivering an Undue Advantage to a Public Agent, Family Members, or third party related to the Public Agent.

In the relationship with Public Agents acting in the inspection and/or supervision of Enauta's activities, the Staff Members must not hinder the inspection activity of such agents, by hiding, segregating, or manipulating the information requested within the specific or ordinary inspection proceedings. It is expressly forbidden, through Bribery or any other form of undue influence or interference, to seek artificial results for the related inspection.

## **6.3 ENGAGEMENT OF THIRD PARTIES**

The engagement of Third Parties must be preceded by an analysis assessing their qualification, reputation, and capacity, seeking to identify a potential involvement in violations of Anticorruption Laws. In case of identification of doubts, suspicions or Alert Signals (see item 6.8 below), the verified facts must be informed to the Compliance Manager for analysis and conduction of new diligence.

The Staff Member who intends to engage a Third Party must follow the internal procedures of the Supply Department.

All agreements with Third Parties with Enauta must follow the guidelines below:

- The agreements must be transparent and based on legal and technical criteria such as the criteria of quality, cost, safety, and punctuality;
- The Third Party must know and undertake to follow the Code of Ethical Conduct and other policies of Enauta, applicable to such contractual relation, including with regard to payments related to trips, entertainment, or other expenses involving Public Agents or Family Members;
- To require that the Third Party should represent to be aware of and to undertake to comply with the Anticorruption Laws, through the Anticorruption Clause approved by the Compliance Manager and by the Legal Department of Enauta;
- To establish fine, suspension, or interruption of the activities, rescission of the agreement, regardless of other applicable measures, if the Third Party violates the Code of Ethical Conduct, the policies applying to Enauta or the Anticorruption Laws, requiring that the Third Party should be liable for any damages and expenses suffered by Enauta in those circumstances, as provided for in the Anticorruption Clause;
- The prohibition of the assignment of the agreement or subcontracting by the Third Party without the Anticorruption clause or without the written consent of Enauta; and
- To require that the Third Party should maintain updated books and records, detailing, if applicable, the expenses incurred in the name of Enauta and providing access to such records, if requested.



Enauta will not pay or reimburse Third Parties for any expenses with fees, commissions, costs, or any other expenses with goods or services, whose amounts are not in accordance with the accepted and legal market practices, or which have as their purpose the practice of illegal acts.

#### **6.4 GRANT OF BENEFITS AND ADVANTAGES: PRIZES, GIFTS, AND HOSPITALITY**

Enauta does not offer and does not authorize its Staff Members or Third Parties to offer, in its name or under the pretext of benefiting them, any prizes, gifts, trips, meals, entertainment, or awards with the purpose of influencing or unduly compensating for an act or decision of any person, be such person a Public Agent or a representative of the other party. Every offer of prizes, gifts, meals, entertainment, or other benefits or advantages must be made in accordance with the Code of Ethical Conduct and with this Policy.

The Anticorruption Laws establish restrictions related to the benefits which may be granted to Public Agents or Family Members. With due regard to the foregoing, legal expenses are permitted in relation to promotion, to the demonstration, or to the explanation of a product or service, or deriving from the execution of a legal contractual obligation, in the name of Enauta, except if expressly forbidden by the Code of Ethical Conduct, by this policy, or by any other policy of Enauta.

All legal business expenses deriving from a contractual obligation, including lodging, meals, and travel expenses must be accurately recorded in the accounting of Enauta, with sufficient details and documentation to identify the amount, the venue of payment, the participants or beneficiaries (by name and position), and the purpose of the payment. All reports of expenses presented for reimbursement must include receipts or any other proof of the expense. The Staff Member who has a personal relationship with a Public Agent or Family Members, whose functions are related to the businesses of Enauta, or whose decisions may influence or benefit, even if indirectly, the Company, he or she must immediately inform his or her direct supervisor and the Compliance Manager. If the Staff Member pay for gifts, trips, meals, entertainment, or benefits of this Public Agent, due to his or her personal relationship, he or she must inform his or her supervisor and the Compliance Manager on the amount of the expense or value of the benefit, the name, the position of the beneficiary, the occasion under which the expense occurred (ex: birthday present, expenses due to disease, etc.), providing the corresponding tax invoices and receipts.

##### **6.4.1 GIFTS AND PRESENTS**

A gift or present is understood as any advantage or favor distributed as courtesy, advertisement, current disclosure, or by occasion of events of important dates of historic or cultural nature which may have an undue influence in the decision of the beneficiary. In addition to that, such distribution must be generalized, that is, it should not be destined exclusively to a specific person. Traditional examples of gifts are: agendas, calendars, notebooks, simple (pens), keyrings, etc., including the logo of Enauta, as well as meals, hospitality, or discounts.

Gifts offered or granted to Public Agents must not exceed a reasonable amount and are only allowed when:

They are authorized by the local laws, regulations, and rules and given in accordance

with specific rules and formalities of each agency or company whose beneficiary is the recipient of the prize (especially in the case of Public Agents);

They are not given or received with the intention of unduly corrupting or influencing;

They do not appear to be improper or when they sign an obligation of reciprocity;

and when they are items related to the brand of Enauta and approved by the Executive Board for distribution, when granted.

We should remember that, in addition to the requirements above, the prizes with a market value in excess of R\$ 100.00 must be treated as an exception and should not be frequently offered or received by the Staff Members of Enauta. In addition to that, such benefits must be informed to the Compliance Manager, through the filling of Exhibit A of this Policy, which must be followed by receipts and proofs.

#### 6.4.2 MEALS

Expenses related to food, involving the receipt from or the payment for Public Agents, for example, of business lunches or dinners, are allowed if they comply with the following requirements:

They must occur in the presence of at least one Enauta Staff Member;

- The purpose is strictly professional and/or institutional (such as, for example: business meetings with meals or meals offered by clients or partners with the purpose of training or informative speeches related to the market);
- The expenses and values involved in these meals must be reasonable;
- The payment is limited to the Public Agents and/or Third Parties, not including expenses related to their Family Members or other guests;

• They are in compliance with the professional ethics and are not motivated by an intention of unduly influencing;

- They do not involve the expectation of receiving something in return;
- The Public Agents or Third Parties involved must not be participating in public or private bidding processes with Enauta on the respective date;

- They are not excessive or improper (e.g. gambling, adult entertainment, etc.); and

- The payment must be made directly to the service provider (e.g.: restaurant).

If the Staff Member has any doubt regarding the requirements above, or the possibility of offering or accepting the invitation to a meal, he or she must contact the Compliance Manager.

#### 6.4.3 LODGING AND TRAVEL EXPENSES

The Staff Members of Enauta are not authorized to incur any expenses related to lodging, tickets, and local transportation involving Public Agents, Third Parties, or Family Members and also they

cannot receive or accept them without the previous approval of the Compliance Manager. For that, they must request approval by filling in Exhibit A of this Policy.

Expenses related to the transportation of Public Agents and Third Parties to the facilities of Enauta, including offshore (i.e., on the platforms and vessels leased to Enauta), for purposes of inspection, technical visitation, or training must be informed to the Compliance Manager, preferably in advance (through the filling of the form in Exhibit A).

#### 6.4.4 ENTERTAINMENT

Entertainment is understood as any type of event with the purpose of providing leisure to the participants. Examples of entertainment are the invitations or tickets to music concerts, theater spectacles, sports events, among others.

Enauta allows its Staff Members to go to and receive entertainment from Third Parties and that its Staff Members offer, promise, or pay for the entertainment of Public Agents and Third Parties, including Family Members, provided such is based on the criterion of reasonableness and that it is based on the following requirements, cumulatively:

- It is the product of the institutional sponsorship by Enauta or by the company which is offering the invitation;
- The entertainment has as its purpose the promotion of values such as culture and sport;
- The invitation has not been offered exclusively to our Staff Members, that is, it has also been offered to the Staff Members of other companies.

The grant or receipt of such benefits must be informed to the Compliance Manager, through the filling of Exhibit A of this Policy.

If the Staff Member wishes to receive or offer entertainment other than in the cases above, he or she must request the previous approval of the Compliance Manager, also using Exhibit A.

#### 6.5 CHARITABLE DONATIONS AND SPONSORSHIPS

It is forbidden to make any contribution or donation in exchange for any favorable decision or Undue Advantage, or to influence any decision of a Public Agent, directly or indirectly, even if the favored entity is a charitable institution.

The contributions, donations, or sponsorships to entities or institutions at the request of a Public Agent, or in which the Public Agent or a Close Person exercises any function, are forbidden. If the Staff Member has any personal relationship with the members of the management of the benefited entity or legal entity, he or she must immediately inform this fact to the Compliance Manager.





The donations and the sponsorships must be included in the annual budget of Enauta and must be made to the benefit of organizations which perform lawful activities. The Staff Member, with the assistance of the Compliance Manager, must research as to the capacity of the entity or legal entity which is the beneficiary of the donation or sponsorship and to seek to ensure that no Public Agent or Third Party, in a position which can influence Enauta's businesses, is benefited, directly or indirectly.

All Staff Members who have the intention to make charitable donations or sponsorships by Enauta, or in its name, must fill in Exhibit B of this Policy and submit it to the Compliance Manager, who will analyze it and, if approved, submit the request for the approval of the Chief Executive Officer.

After the transaction is approved, the payments related to the sponsorship or donation will be mandatorily made in favor and in the name of the beneficiary institution or company, that is, they cannot be made in the name of the individual. Under no circumstance may the payments be made in cash or through a deposit to the current account of an individual.

It will always be necessary to have the proof, through a tax invoice or receipt, in accordance with the applicable tax laws.

## **6.6 POLITICAL DONATIONS**

Each and every political donation is forbidden, be it for candidates, political parties, representatives of parties or similar campaigns, by Enauta or in its name.

Although the participation of Staff Members in political activities is respected, which must always occur with a personal nature, out of the working hours and in compliance with the guidelines of the Code of Ethical Conduct, Enauta is not involved in political party activities. Due to that, the Staff Members of Enauta must not conduct any political activity in the name of Enauta or making use of its facilities or property, such as telephones, computers, institutional e-mail, accounts in social networks, and videoconference equipment.

## **6.7 MERGERS, ACQUISITIONS, OTHER CORPORATE TRANSACTIONS, AND PARTNERSHIPS**

To ensure the compliance with the Code of Ethical Conduct and with this Anticorruption Policy and to prevent risks related to the Anticorruption Laws, in case of acquisition of quotas or shares of other companies, consolidation, merger, or other corporate transactions must follow the guidelines and Anticorruption Due Diligence procedures defined in the Policy of Partnership Establishment of Enauta, aiming at evaluating and identifying signs of irregularities or illegalities in the target company of the transaction or the existence of vulnerabilities in its integrity program and internal control system.

The Staff Members must always seek partners which identify with and commit to the values, beliefs, and commitments included in the Code of Ethical Conduct and in the related policies of Enauta.

The contracts and agreements applying to item 3 of the Policy of Partnership Establishment of Enauta must establish the obligation to comply with the rules provided for in the Code of Ethical Conduct and in the related policies, as well as to comply with the Anticorruption Laws.

In the process preceding the establishment of a consortium, partnership, joint venture, or the admission of Enauta in this type of company, the Compliance department must conduct an Anticorruption Due Diligence in the potential Partner, as defined in the Policy of Partnership Establishment, to verify not only the values and commitments of its future business partner, but always the background of contingencies and reputation of those companies.

## **6.8 WARNING SIGNS**

Warning Signs are suspicious circumstances which may indicate the risk of violation of the Anticorruption Laws, as well as situations which are unlawful or incompatible with the ethical standards required by Enauta.

The Staff Members must be attentive to the Warning Signs. The existence of a Warning Sign must be immediately informed to the Compliance Manager, in order to investigate the facts and prevent the occurrence of violations and irregularities.

Warning Signs are not, necessarily, evidence of violation of the Anticorruption Laws, of the Code of Ethical Conduct, or of Enauta's Policies, nor of the practice of Corruption, nor do they disqualify, automatically, counterparties or Third Parties. However they raise suspicions which must be investigated, ensuring the protection of the ethical standards adopted by Enauta, preventing acts of Corruption and preserving the image of the Company.

In the training on the Anticorruption Policy, the Staff Members must be instructed as to the identification of Warning Signs, including key concepts and examples.

## **6.9 ACCOUNTING RECORDS**

The Anticorruption Laws required the faithful and accurate recordkeeping of all payments made by Enauta, in addition to its documentation. In the same way, the Staff Members and Third Parties must be directed to ensure that all transactions or operations which are in any way related to Enauta's business are recorded in reasonable detail, allowing their identification, and they must be correctly and faithfully reflected in the books and records and respective accounting periods, in conformity with the applicable legal and accounting requirements.

Aiming at ensuring the integrity and accuracy of its property and financial situation, Enauta must:

- keep its books and accounting records accurately reflecting all the transactions made;
- keep a system of internal accounting controls providing a reasonable assurance that the transactions are made as authorized;

- control and record all of its corporate assets.

Each Staff Member is responsible for the integrity and conformity of the information, reports, and records under his or her control with policies and internal controls of Enauta, local laws, practices, and rules.

The Staff Members must assist all internal or external audits and investigations and shall never make false or misleading representations in a record of the company or to any person regarding the financial activities of the Company.

## **6.10 BIDDING PROCESSES**

DURING A BIDDING PROCESS, THE STAFF MEMBERS IN CHARGE OF THE NEGOTIATION AND PARTICIPATION OF ENAUTA IN THE BIDDING PROCESS MAY NOT ACCEPT INVITATIONS, GIFTS, OR ANY OTHER UNDUE ADVANTAGE OFFERED BY THE OTHER BIDDERS.

Any possible or apparent Conflict of Interests during a bidding process must be informed to the Compliance Manager for analysis and opinion as to the participation of the Staff Member in situations of conflict in the process.

Throughout a bidding process, it is forbidden to offer, promise, or give entertainment, gifts, meals, trips, or any similar advantage to a Public Agent, his or her relatives or any other person involved in the process.

## **6.11 CONFIDENTIAL CHANNEL**

The Confidential Channel is the communication channel created by Enauta to allow the Staff Members to inform of suspicions related to the standards of conduct and ethical principles of Enauta, including potential violations of the Code of Ethical Conduct or of this Anticorruption Policy.

If the Staff Member identifies a Warning Sign, a suspicion, or a situation which may be considered a potential violation of this Policy, or of another internal rule of Enauta, he or she must immediately use the Confidential Channel. Doing that, the Staff Member will fulfill his or her duty to watch for the ethical principles of Enauta.

At the discretion of the Staff Member, the contact may be made:

- through the website: [www.canalconfidencial.com.br/enauta](http://www.canalconfidencial.com.br/enauta);
- through the phone number: 0800 741 0022; or
- directly to the Compliance Manager.

The content of the report must be as complete as possible, so as to enable a possible investigation proceeding, which will always preserve the secrecy of the information obtained.

Upon using the Confidential Channel, the Staff Member may choose to remain anonymous, if so desired. No Staff Member who, in good faith, reports a suspicion of violation of the laws, regulations, and internal rules of Enauta will suffer any reprimand or retaliation.

The Compliance Manager will analyze the reports or information in accordance with the internal rules of verification of information and investigation of Enauta.

## **6.12 QUESTIONS**

Enauta makes its Compliance Department available to the Staff Members, to answer questions related to the application of this Policy and to the Anticorruption Laws. The Compliance Department and the Legal Department offer guidelines, in case of risks or suspicions of violations, as well as information on the disclosure and training on this Policy and the Anticorruption Laws. Disciplinary Measures

The violations of the Anticorruption Laws may result in serious penalties to Enauta and to the Staff Members involved, directly or indirectly, for Corruption practices. Based on this Policy, on the Anticorruption Laws, and on the internal policies of Enauta, the practice of fraud or Corruption by a Staff Member, or any violation of this Policy, will subject the perpetrator to disciplinary measures, which may include the rescission of the employment agreement or of the service agreement, as applicable, in addition to civil, administrative, and criminal penalties.

## **7. FINAL PROVISIONS**

### **7.1 GENERAL RULES AND REFERENCES**

The following internal rules must be considered in the application and interpretation of this Anticorruption Policy:

- Code of Ethical Conduct;
- Policy of Partnership Establishment;
- Procedure for the Management of Suppliers;
- Procedure of Engagement Management); and
- Procedure for Sponsorships, Institutional Support, and Philanthropic Donations.

### **7.2 COMMUNICATION AND TRAINING**

To ensure that all know and understand this Policy, so that it may be followed and applied, it must be disseminated through a program of communication and training. The participation of the Staff Members of all hierarchical levels in the training is mandatory and must be documents.

### **7.3 TERM**

This Policy is valid for an indeterminate period, and will enter into force on the date of its approval by the Board of Directors of Enauta.

## **EXHIBIT A**

**Form for communication of request of approval for the granting of benefits to public agentes**

**Enauta Compliance**

This form must be filled in the following events:

- i. when you want to give or receive a prize in the excesso of the total amount of R\$ 100.00.
- ii. when you want Enauta to pay for the transportation of a Public Agent or Third Party.
- iii. when you want, for personal reasons, to give a gift or pay for a trip, meals, entertainment, or other expenses of a Public Agent and his or her Family Members or of a Third Party and his or her Family Members in whose decisions Enauta has a direct or indirect interest whose total amount exceeds R\$ 100.00.

**Note:** It will not be necessary to fill in this form for: (i) the offering or acceptance of prizes below R\$ 100.00; and (ii) expenses related to transportation to Enauta's facilities which have been established or regulated in a specific agreement.

**Important:** Attach all payment receipts of the expenses related to the benefits granted.

Date:
Name:
Post:
Sector:
Email:
Telephone:

**1. Type of benefit proposed or to be received**

	Prizes or gifts	
	Transportation	
	Entertainment	
	Trips and lodging	

**2. Information on the Public Agent or Third Party (and Family Members, if applicable)**

Name of the individual or legal entity:
Trade name:
CNPJ or CPF:
Address:
Contact person, with telephone or e-mail:
Type of activity performed by the beneficiary:
Site:
Period of performance:

**3. What is the value of the benefit (detailed and total amount)?**

**4. What is the reason or motivation to offer/receive the benefit for the Public Agent, Third Party, or Family Members?**

**5. Date on which the benefit must be acquired, offered, or accepted:**

If the benefit has already been offered or accepted, justify the reason for not previously filling in this form.

**6. Did the company, in the past, already provide or receive similar benefits for the same Public Agent, Third Party, or Family Member?**

**7. Is there any ongoing process of engagement at Enauta or already provided for the future to which the Third Party or his or her Family Member is or will be a party?**

**8. Is the intended benefit recurring? If so, inform how often this must occur.**

**9. Has anybody requested such benefit? If so, who and when? Was this request official/formal? Was the benefit requested by the Public Agent or Third Party him or herself? If not, how have you identified and selected the Public Agent or Third Party? If you are receiving a benefit, this question does not apply.**

**10. Is the offer being made in a transparent manner? Explain.**

**11. Does the Public Agent or the Third Party or Family Members have any decision-making power which may benefit Enauta, even if indirectly?**

**12. 12. Do the costs of the benefits seem to be in conformity with the anticorruption guidelines established in the Code of Ethical Conduct and with the market practices? Please, explain your answer.**

**13. Check if the Public Agent, Third Party, or Family Members are subject to any rule for the receipt of benefits from the private sector (Code of Ethical Conduct; Policies for the receipt of Gifts, etc.). Inform below the document which were verified.**

**14. Does the Public Agent or Third Party need a formal authorization to receive the benefit?**

**STATEMENT OF THE REQUESTING PARTY:**

I hereby represent, under the penalties of the Law, as far as I know, that the information provided in this form is complete and true, and that I am aware of the rules established in the Code of Ethical Conduct and in Anticorruption Policy of Enauta. I also represent that the benefits herein requested are not an attempt to violate, even if indirectly, the Brazilian and/or foreign anticorruption laws, nor do they have any corrupt intention, even if indirect.

Signature:

#### RESPONSIBLE MANAGER: Agreed

Name:

Signature:

#### Statement of the Compliance Manager

Agreed

Approved

Not approved

I request the following additional information:

Describe the additional information

## EXHIBIT B

### Form for the request of donation to philanthropic entity or sponsorship

#### Enauta Compliance

Date:

Name:

Position:

Sector:

Email:

Telephone:

#### 1. Type of Benefit

Donation

Sponsorship



## 2. Information on the Beneficiary (NGO, Philanthropic Institution, Sponsored Company)

Name of individual or legal entity:

Trade name:

CNPJ or CPF:

Address:

Contact person, with telephone and e-mail:

Type of activity performed by beneficiary (e.g. help to poor children):

Site:

Period of performance:

If you know, inform if the Officers of the Institution, Members, or shareholders of the benefited company are Public Agents or their Family Members or if they have any decision-making power which may benefit Enauta, even if indirectly.

## 3. Information on the main members and managers

Name:

Position:

CPF:

Name:

Position:

CPF:

## 4. How often will the donation or sponsorship be made?

## 5. Has this beneficiary already received any type of donation or sponsorship by Enauta before?

### REQUESTING PARTY'S STATEMENT:

I hereby represent, under the penalties of the Law, that, as far as I know, the information provided in this form is complete and true, and that I am aware of the rules established by the Code of Ethical Conduct and by the Anticorruption Policy. I hereby also represent that the benefit herein requested does not constitute any attempt to violate, even if indirectly, the Brazilian and/or foreign anticorruption laws, nor does it have any corrupt intent, even if indirect.



Name:
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Signature:
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<b>MANAGER IN CHARGE: Agreed</b>
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Name:
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Signature:
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