

1. INTRODUCTION

This Policy on Relationships with Public Officials is applicable to all Grupo SBF collaborators and their various relationships with stakeholders, suppliers and other third parties, regardless of hierarchical level, job duties, positions held, their locality, or the business unit where they carry out their activities.

Application of this Policy has the full support and involvement of the Board of Directors, CEO, Executive Board, as well as the boards of the business units that comprise Grupo SBF.

2. OBJECTIVE

The objective of this Policy on Relationship with Public Officials is to guide the standards of conduct that collaborators, third parties, representatives, consultants, or any other individuals acting on behalf of Grupo SBF must comply with in their relationships with Brazilian or foreign public officials.

3. CONDUCT GUIDELINES

3.1. Who are Public Officials?

Public Officials are persons who act on behalf of the State, albeit temporarily or without pay, whether by election, appointment, designation, contracting, or any other form of investiture or relationship.

3.2. Relationship with Public Officials

During the activities carried out by Grupo SBF, it is normal that contacts and meetings with public officials take place.

Accordingly, and as provided for in Grupo SBF's Code of Ethics and Anti-Corruption Policy, collaborators must be aware that relationships with public officials must always be guided by the principles of ethics, legality, legitimacy, and transparency.

It is prohibited for collaborators – as well as any third parties acting on behalf of Grupo SBF – to make any offer, donation or promise of undue advantages or any amount in cash, gifts, gratuities, or items of value to any public official, domestic or foreign.

4. DOUBTS AND COMPLAINTS

Non-compliance with this and other Grupo SBF Policies must be reported by collaborators via the Confidential Hotline and/or to their immediate supervisor so that the case can be analyzed by the Compliance area.

In case of doubts regarding the content of this Policy, anyone may contact it through the communication channels indicated below.

4.1. Communication Channels:

- a) Telephone: 0800 721 0761, from Monday to Friday, 9am–9pm
- b) Website: www.canalconfidencial.com.br/gruposbf
- c) Intranet: <https://www.canalconfidencial.com.br/gruposbf/>

4.2. Non-Retaliation

Any act of retaliation against any person who expresses concerns, reports situations, or seeks advice regarding doubts and/or possible violations of the provisions of this and other Grupo SBF Policies is strictly prohibited.

5. INFRACTIONS AND PENALTIES

Any violation or non-compliance with the provisions of this Policy shall be dealt with in accordance with the measures deemed appropriate by Grupo SBF, due to the seriousness and extent of the facts to be analyzed.

6. EFFECTIVENESS

This Policy enters into effect after approval by the Board of Directors, superseding any previous guidelines, rules or policies on the subject, and may be terminated at any time by decision of Grupo SBF.

7. DEFINITIONS

- a. **Public Officials:** any and all persons belonging to the structure of any of the three branches of government (executive, legislative, and judiciary), of any federated state in Brazil or of a foreign State, or person, appointed or invested with powers to represent a public agency or entity, whether an employee, administrator, occupant or candidate for elective office or political party, or whoever – even if temporarily or without pay – holds a position, employment or public function in government bodies, regulatory agencies and state-run entities, or mixed-capital corporations, or state-owned enterprises, in addition to any private holders of a public function by delegation.
- b. **Administrators and Collaborators:** all members of the Board of Directors, CEO, Officers, and Employees of Grupo SBF.
- c. **Anti-corruption law:** All laws and regulations that deal with acts of corruption and harmful acts committed against the public administration, including but not limited to the Anti-Corruption Act (Law 12846/2013), its Regulatory Decree (Decree 8420/2015), Public Bidding and Contracting Act (Law 8666/1993), Administrative Misconduct Act (Law 8429/1992), Brazilian Penal Code (Decree-Law

2848/1940) and other foreign laws with cross-border enforceability, adherent to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the Organization for Economic Co-operation and Development (OECD), including its regulations, and other related standards.

d. **Third parties:** any and all individuals or legal entities not belonging to Grupo SBF that relate to or act (directly or indirectly, in any way whatsoever) on behalf of or for the benefit of the Group, including but not limited to service providers, consultants, representatives, attorneys-in-fact, suppliers, customs brokers, business partners, agents, lawyers, among others.

e. **Undue advantage:** all goods of value, tangible or intangible, whether cash and equivalents, such as product donations, gifts, entertainment, hospitality and meals, offered, promised or delivered with the objective of improperly influencing or rewarding any act, decision or omission by a person, whether a public official or a person equivalent thereto. Even supplying products with special discounts or free of charge, and offering employment to a public official, or person related thereto, constitutes an Undue Advantage.