

solví	Nº de referência PCO-003 (IN) - Anticorruption	Nome Anticorruption		Data de Elaboração 16/08/2023 16h53
	Revisão Atual		Responsabilidades	
Versão Cópia mestra	Data 06/09/2023 14h44	Elaboração LEOPOLDO RAGAZZINI MARTARELLI PECORARO	Análise crítica Comitê de Conduta, Danilo Dias Simões, VINICIUS DA SILVA FERREIRA	Aprovação Conselho de Administração

1 - OBJETIVO

Describe and explain the expected conduct in borderline situations related to bribery and corruption and highlight the compliance requirements specific to it, reinforcing the commitment to conduct all business with the highest standards of honesty and integrity.

2 - USUÁRIOS

This Corporate Policy applies to all Solví Employees, regardless of the hierarchical level, as well as non-employees who hold positions in any corporate or governance body, including directors, directors and committee members, including Holding and CSC. It also applies to all employees of all direct controlled companies called UVS - Sustainable Valuation Unit, in all its operations in the countries where they operate, the joint subsidiaries in which their adoption is to be approved by their Board of Directors or equivalent local body. The SOLVÍ Group, through the broad application of this policy, guides and obliges everyone to conduct business ethically, with absolute integrity.

3 - TERMOS E DEFINIÇÕES

3.1 Terms and definitions

3.1.1. PIS - Sustainable Integrity Program: its mission is to increasingly strengthen the ethical posture and absolute integrity that guides our attitudes and values. PIS is one of the pillars of the Solví Business Model (MES). All Solví Group Programmes are underpinned by the PIS and respect its premises and guidelines;

3.1.2. SGAS - Anti-Bribery and Compliance Management System: set of interrelated or interactive elements of an organization, to establish policies, controls and processes to achieve the objectives of preventing corruption and bribery practices and to demonstrate their commitment to complying with relevant laws, regulatory requirements, industry codes and organizational standards, as well as standards of good governance, generally accepted best practices, ethics and community expectations;

3.1.3. Corruption: is the abuse of power or authority practiced by any person, whether Public Agent or not, to obtain illicit advantages for themselves or third parties. The most common form of corruption is bribery;

3.1.4. Active Corruption: this is to offer, offer or promise, directly or indirectly, any advantage, financial or otherwise, to any natural or legal person, public or private in order to ensure any kind of improper advantage;

3.1.5. Passive Corruption: is to receive, directly or indirectly, any advantage, financial or not, to any individual or legal person, public or private, in order to guarantee any kind of improper advantage;

3.1.6. Bribery: offer, promise, donation, acceptance or solicitation of an undue advantage of any value (which may be financial or non-financial), directly or indirectly, regardless of location, in violation of applicable laws as an incentive or reward for a person acting or failing to act in relation to the performance of his obligations;

3.1.7. Improper advantage: the term "improper advantage" covers any advantage, financial or otherwise, direct or indirect, carried out for the purpose of obtaining benefits in breach of the law of third parties;

3.1.8. Public Agent: (i) any public or elected official, agent, employee (regardless of position) or person acting on behalf of a national, state or local government, department, agency, agency, property company or state control,

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international public organisation, political party or entity financed mainly by public funds, which is generally perceived as an entity performing governmental functions, or which has key executives or directors appointed by a government; and (ii) any political party, political candidate for office or any person acting on behalf of the political party or candidate;

3.1.9. **Public Agent Family:** for the purposes of SOLVI's Anti-Corruption Policy, the family members of any Public Agent may also be qualified as such, when their action is intended to confer any advantage or thing of value to a Public Agent;

3.1.10. **Third Parties (Supplier or Service Provider):** the definition of "Third Parties" encompasses all business partners of the Solví Group, which includes, but is not limited to, all its suppliers of materials, goods or services, including also all those who, directly or indirectly, acting on behalf of the Solví Group. The Solví Group considers as its business partners all its intermediaries, contractors, subcontractors, agents, consultants, representatives, brokers, lawyers, accountants, suppliers, among others;

3.1.11. **Board of Directors:** is the Company's body of Colegiada nature, which aims to establish the general orientation of the Company's business and decide on strategic issues. Their mission is to protect and value the Company's assets and maximize the return on investment.

3.1.12. **Conduct Committee:** advisory body of the Board of Directors of the SOLVÍ Group, is the highest body responsible for analyzing and addressing the application of consequences to occurrences of violations of the Code of Conduct;

3.1.13. **Integrity Committee:** corporate executive body, responsible for promoting the continuous strengthening of PIS - Solví Sustainable Integrity Program and ensuring the existence of the same type of program, in the image and likeness of PIS Solví, in each company and subsidiary belonging to the Group. Acts on behalf of the Executive Board of Solvi, sponsored by the Board of Directors to whom it regularly reports its activities;

3.1.14. **UVS (Sustainable Valuation Units):** concerns each of the companies that make up the Solví Group, whose mission, obligations, responsibilities and contributions should be focused on the sustainable development of its territory of influence.

3.2 Documents of reference

3.2.1. **Brazilian Corporate Anti-Corruption Law - Federal Law no. 12.846/2013,** sanctioned in August 2013 and which provides for the objective administrative and civil liability of legal entities for the practice of acts of corruption against public, national or foreign administration;

3.2.2. **Legislative Decree Peru - Decree No 1352/2018** on corporate liability for existing criminal offences related to corruption, money laundering and terrorist financing;

3.2.3. **Anticorruption Law Argentina - Law nº 27.401/2017** that provides for criminal liability applicable to legal entities of private law, domestic or foreign, when they commit corruption violations against the public administration, such as bribery and influence trafficking, negotiations incompatible with the civil service, illicit enrichment and apocryphal business balances;

3.2.4. **FCPA (Foreign Corrupt Practices Act) - Law on Corruption Practices Abroad of the United States,** considered the pioneering law to combat corruption abroad, in force since 1977;

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- 3.2.5. UK Bribery Act - Enacted by the United Kingdom in April 2010, the act covers criminal law related to bribery and anti-corruption;
- 3.2.6. ABNT NBR ISO 37001 - "Anti-Bribery Management System";
- 3.2.7. ABNT NBR ISO 37301 - "Compliance Management System";
- 3.2.8. COD-001 - Solví Code of Conduct;
- 3.2.9. PCO-004 - Consequence Management;
- 3.2.10. PCO-002 - Travel, Transportation and Telephony Expenditure Policy;
- 3.2.11. POC-011 - Conflict of Interest Policy;
- 3.2.12. POC-012 - Donation and Sponsorship Policy;
- 3.2.13. POC-013 - Mergers, Acquisitions and Other Corporate Operations Policy;
- 3.2.14. POC-014 - Policy of Interaction with the Public Power;
- 3.2.15. POC-015 - Gifts, Gifts and Hospitality Policies;
- 3.2.16. POC-016 - Third Party Relationship Policy;
- 3.2.17. PAF-JR-06 - Due Diligence of Individuals and Legal Entities.

4 - DESCRIÇÃO

4 - DESCRIPTION

This Policy aligns with the fulfillment of our Mission and Vision, as well as the respect for Solví's Corporate Values, which define our identity and our direct and indirect controls. All commitments expressed through regulations, policies and procedures, which are part of the Sustainable Integrity Program (PIS) are closely linked to the commitment to respect compliance obligations, laws, the Code of Conduct and the culture of responsibility, ethics and integrity that guide our attitudes and seek to ensure the sustainability, image and reputation of Solví Group companies.

4.1. Anti-corruption policy

4.1.1. Solví's Anti-Corruption Policy obliges all employees of all companies controlled, directly or indirectly, in all its operations in the countries in which it operates, to conduct SOLVI's business ethically, with absolute integrity. The Anti-Corruption Policy directs compliance with the SOLVI Code of Conduct and all applicable laws and regulations against bribery and corruption, including, without limitation, the laws and regulations of Brazil and the countries in which SOLVI operates, in addition to international best practices.

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4.1.2. The possible violation of anti-corruption laws exposes SOLVÍ, its employees and business partners involved, regardless of nationality or place of residence, to criminal, civil and/or administrative responsibilities, and fines and penalties laid down in specific legislation.

4.1.3. The Anti-Corruption Policy specifically prohibits that directors, directors, managers, employees ("Employees") and Third Parties (Supplier or Service Provider), directly or indirectly, offer, promise, provide or authorize any person to provide money or anything of value to any Public Agent or to any individual or legal entity under private law, for the purpose of obtaining or accruing any improper or facilitating advantage.

4.1.4. SOLVI does not authorize and does not tolerate any business practice that does not comply with the Anti-Corruption Policy. All its Employees and Third Parties have the duty to periodically review business practices in order to identify any inconsistencies with the Anti-Corruption Policy and immediately make the necessary adjustments, ensuring its full compliance.

4.1.5. This document does not aim to provide answers to all questions regarding possible situations that may arise in the course of SOLVI's business. The cases mentioned are merely exemplary, in order to help Employees and Third Parties understand the object and importance of the Compliance policy, not reflecting, therefore, all the circumstances covered by the Anti-Corruption Policy. Any doubts should be resolved with the SOLVI Conduct Committee, accessed by the Communication Channels.

4.1.6. SOLVI does not admit in its activities any form of bribery, corruption, discrimination or harassment, requiring full compliance with the rules established in its code of conduct, associated policies, compliance obligations, applicable laws and requirements that integrate SOLVÍ's commitment to continuously improve the compliance management system. Solví should have a trained professional responsible for conducting the smooth running of the management system with authority, independence and full access to Senior Management, Conduct Committee and Board of Directors, having the necessary resources to continuously improve its operation, through the structure of the Sustainable Integrity Program the compliance attributions, that will have the function of Anti-Bribery Compliance and will manage the set of elements aimed at the prevention, detection and response to any non-compliance with compliance obligations, code of conduct, policies, procedures and current legislation, including the application of applicable penalties in case of non-compliance with any item of this policy, as a result of a process of investigation of possible violation, which will be exempt and confidential, according to policy PCO-004 - Consequences Management.

4.1.7. The implementation of the policies that make up the Sustainable Integrity Program falls to SOLVI's Compliance Department and, in its direct and indirect subsidiaries, to the corresponding department of each unit under the responsibility of the local Anti-Bribery Compliance Function.

4.2. Anti-Bribery Commitment

4.2.1. It is the responsibility of all employees of the SOLVÍ Group and its entire or joint subsidiaries to ensure compliance with this Policy.

4.2.2. Our fundamental standards are:

- Bribery is prohibited;
- Compliance with codes, policies, procedures and other internal rules is mandatory, in particular for the purpose of the theme of this Policy, those related to the PIS - Sustainable Integrity Program; comply with anti-corruption laws and other requirements applicable to SOLVI; meet the requirements of the Anti-Bribery Management System;

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- Continuously improve the Anti-Bribery Management System.

4.2.3. Solvi encourages its Employees and Third Parties to report to the Reporting Channel, securely and, if desired, anonymously, any conduct contrary to this Policy. Reporting channels are described in accordance with item 7 of this document.

4.2.4. Whenever sued by the Solvi Conduct Committee or the Conduct Committee of the controlled company, Solvi Group employees must collaborate with internal investigations of conduct violations, as well as collaborate with the Government in any investigation of suspected irregularities or violation of the law, assisting in obtaining information and documents that support its occurrence.

4.3. Corruption or bribery of public officials

4.3.1. Regardless of what is legally established, SOLVI does not admit and does not allow the offer, promise, authorization or payment of money or anything of value, directly or indirectly, by Employees and Third Parties, to a Public Agent whose objective is to guarantee any kind of improper advantage, regardless of whether it is accepted or not by the target recipient, and whose purpose is:

- influence any act or decision of a Public Agent;
- induce any Public Agent to perform any act in violation of his legal duties;
- ensure undue advantage to any Public Agent;
- induce any Public Agent to use its influence for the purpose of obtaining, and
- maintain or forward business to anyone.

4.3.2. For purposes of this Anti-Corruption Policy, the terms "obtain," "maintain," and "forward business," are interpreted broadly to include commercial and/or administrative advantages, such as contracts, measurements, payments, obtaining public papers such as licenses, permits and tax and tax reductions.


4.4. Corruption or bribery of the private sector

4.4.1. SOLVI's Anti-Corruption Policy also prohibits bribery in the private sector, and it is expressly forbidden for Employees and/or Third Parties to offer, give, promise or receive money or anything of value to any individual or legal entity under private law, in order to obtain for SOLVI Group companies, for you or third parties, any improper advantage.

4.5. Anything of value

4.5.1. The expression "anything of value" covers:

- benefits and favours, such as special accesses, preferences, invitations and indications;
- free services that should be contracted and paid for;
- non-institutional gifts or gifts of a value above R\$ 100.00 (one hundred reais) or its equivalent in the monetary expression of each country;
- contracts or other business opportunities granted to an undertaking for which a Public Agent has any interest;
- employment, consultancy or hiring opportunities for any activity;

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(vi) donations of any kind, with the exception of social donations, which must comply with the legislation in force in each country;

(vii) payment of medical, hospital or related expenses, not falling within the definition of humanitarian aid or intended to avoid imminent danger to the life of any person;

(viii) payment of education or living costs;

(ix) travel, dining, accommodation, shopping or entertainment expenses.

4.6. Facilitating payment

4.6.1. Any payment, regardless of value, made in order to facilitate, accelerate or obtain any undue advantage in acts performed by Public Agents is considered as Facilitating Payment.

4.6.2. The term "routine public actions" means any action intended to facilitate, expedite, accelerate and/or ensure the practice of any act performed, directly or indirectly, by a Public Agent, such as:

- (i) validation of registration or acceleration of registration by or for SOLVI;
- (ii) obtaining permits, licences and/or official documents to qualify an individual or legal entity to conduct business;
- (iii) the processing of government papers such as visas and work applications;
- (iv) police protection, security, mail collection and delivery services, or scheduling inspections;
- (v) telephone services, electricity and water supply, cargo transportation or goods protection against deterioration.

4.7. Accounting records

4.7.1. Any payment made or received by SOLVI and its Collaborators on its behalf must be registered and accounted for, being expressly prohibited:

- (i) carrying out secret, unregistered and/or unreported operations;
- (ii) inappropriate, ambiguous or fraudulent accounting entry;
- (iii) the use of accounting artifice that aims to hide or in any way cover up payments illegal;
- (iv) falsify or request reimbursement of expenses that do not meet the internal requirements and procedures of each company.

4.8. Violations and disciplinary measures

4.8.1. Any violations of this policy or other internal policies of SOLVI will be recorded and verified by the Conduct Committee, which will define the applicable disciplinary measures, according to PCO-004 Consequences Management Policy.

4.8.2. SOLVI's Anti-Corruption Policy takes into account that it or its companies and its Employees can be investigated through the regulatory bodies of different jurisdictions, and, depending on the circumstances, processed administratively, civilly and/or criminally. Any Contributor caught in violation à Anti-Bribery Policy will be subject to

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disciplinary measures, applied in accordance with the laws and other policies of SOLVI and its subsidiaries.

4.8.3. Agents, consultants and third parties contracted and/ or working for the Solví Group regardless of contract, caught in violation of the Anti-Corruption Policy, will be subject to the termination of their commercial relationship with the Group companies, without prejudice to remedial measures, necessary for the reparation of the violation committed.

4.8.4. To exemplify any violations of SOLVI's Anti-Corruption Policy, the following are some cases that may suggest non-compliance with this Policy or represent common areas of risk to the Compliance program related to corruption. The examples are merely illustrative and do not exhaust all cases of infringement, and doubts about specific facts should be directed to the competent channels.

4.8.5. The SOLVI Group's anti-corruption policy may be infringed by:

- payments offered or made in cash for illegal or unethical purposes;
- gifts or hospitality outside the criteria of the Anti-Corruption Policy involving a Public Agent;
- improperly documented payments or expenses;
- requests by an employee or a third party for an operation to be structured in such a way as to disguise relevant facts or not to comply with local laws;
- request for payment in a country other than that in which the head office or main administrative offices of the company for which the contracted Employee is located, or where he has a permanent establishment directly involved in the performance of the business;
- hire an unqualified third party or newly constituted legal entity, without experience and material and human resources necessary to perform the functions for which he was hired;
- the Third Party's refusal to attest to compliance with anti-corruption practices or to make representations, warranties, and related language included in SOLVI's model contracts;
- hire Third Party with current or previous history of cases of corruption or other legal violations;
- hiring a third party through a procedure not equal to competitors or with a personal, family or commercial relationship with a Public Agent;
- inclusion in contracts with Third Parties of terms not usual or in disagreement with the policies of contracting SOLVI, or forms of payments contrary to specific laws or money laundering, payments in kind (currency), in currency of another country, third parties unrelated to the commercial transaction or prior to the conclusion of a purchase contract (advance payment);
- payment of fees or fees to Third Parties that exceed the price usually charged by SOLVI's policy or specific market for similar services in the same geographical area.

4.9. Responsibilities

4.9.1. Legal, Compliance and Risk Management

- have access to all functions, records, property and personnel of Solví and other directly and jointly controlled companies, taking into account the availability of the persons involved;
- have full and free access to the Board of Directors, the Senior Management and the Conduct Committee should any question or concern need to be raised regarding bribery or the anti-bribery management system; allocate resources and apply the techniques required to achieve SOLVI's anti-bribery objectives;
- obtain the necessary assistance from employees in the various Solví areas and their direct and joint controlled companies;
- provide advice and guidance to staff on the Anti-Bribery Management system and anti-bribery issues;
- report the results of the Anti-Bribery Management System to the Board of Directors, Senior Management and

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other functions as appropriate;

- ensure prompt interruption of irregularities and timely remediation of the situation; take any other action concerning the discontinuity of acts of corruption, bribery and fraud;
- ensure that those involved in corruption, bribery and fraud are punished in accordance with Solví's guidelines;
- perform the Compliance function in the Anti-Bribery Management System with autonomy and independence to report directly to the higher authorities;
- select and appoint the responsible UVS Anti-Bribery Compliance Function. For companies with partners the appointment will depend on their approval according to the Company's governance, when applicable.

4.9.2. Risk Management, Internal Controls and Compliance

- oversee the design, implementation and improvement of the Anti-Bribery and Compliance Management system;
- ensure that the Anti-Bribery and Compliance Management system complies with the requirements of ABNT NBR ISO 37001 and ISO 37301;
- perform and maintain SOLVÍ's risk analysis, develop and improve internal controls.

4.9.3. Compliance Anti-Bribery

- be responsible for the Anti-Bribery and Compliance Management system;
- continuously improve the functioning of the Anti-Bribery and Compliance Management system;
- managing all elements of the Anti-Bribery and Compliance Management system, aimed at preventing, detecting and responding to any breaches of the obligations of the integrity program, code of conduct, policies, procedures and current legislation;
- apply the appropriate penalties in case of non-compliance with any item of the anti-corruption policy, as a result of a process of investigation of possible violation, exempt and confidential, according to policy PCO-004 Consequences Management Policy.

4.9.4. Financial Board

- have access to all functions, records, property and personnel of Solví and other directly and jointly controlled companies, taking into account the availability of the persons involved;
- obtain the necessary assistance from employees in the various Solví areas and their controlled companies directly and jointly;
- give subsidies to the Legal, Compliance and Risk Management Board and its team to report the results of anti-Bribery Management System, to the Board of Directors, Senior Management and other functions, whenever necessary.

4.9.5. Conduct Committee

- receive, analyse information on the Anti-Bribery Management System and define actions based on the critical analyses carried out;
- examine issues involving ethical values and conduct of Group companies;
- analyse violations committed by employees and business partners who arrive via the Reporting Channel or who have been identified by internal means;
- address appropriate disciplinary measures and, where applicable in more serious cases, submit those measures to the Management Board;

4.9.6. Integrity Committee

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- create or improve policies and procedures related to the Sustainable Integrity Programme; promotion of corporate actions aimed at the effectiveness of Compliance Risk Management;
- periodically assess the activities and actual results of the monitoring carried out by the Controller and the Internal Audit;
- monitor the performance of the Whistleblowing Channel and assess the implementation of the Consequence Management Policy;
- propose, monitor implementation and evaluate the results obtained with improvements in Internal Processes and Controls;
- propose, monitor implementation and evaluate the results of further training or reinforcements; propose and monitor the implementation of Communication actions for the internal and external public.

4.9.7. Board of Directors

- receiving and critically analysing at planned intervals information about the content and operation of Solvi's Anti-Bribery Management system;
- require that the appropriate and appropriate resources necessary for the effective operation of the Solvi Anti-Bribery Management system are allocated and allocated;
- exercise reasonable oversight over the implementation of Solvi's Anti-Bribery Management system; validate and approve this anti-bribery policy;
- resolve on conflict situations established by conflicting guidelines between Brazilian and foreign UVS;
- validate and approve the anti-corruption policy.

4.9.8. Chief Executive Officer

- ensure, through management and governance systems, the dissemination of ethical values and principles and conduct in the Company and ensure that they are complied with.

4.9.9. Executive Board

- ensure that Solvi's organisation strategy and Anti-Bribery Policy are aligned;
- ensure the integration of the requirements of the Anti-Bribery Management system into the organisation's processes; provide adequate and appropriate resources for the effective operation of the Anti-Bribery Management system;
- ensure that the Anti-Bribery Management system is appropriately designed to achieve its objectives;
- direct and support staff to contribute to the effectiveness of the Anti-Bribery Management system; promote an appropriate anti-bribery culture within Solvi;
- monitor compliance with and implementation of the Solvi Integrity Programme, established to mitigate risks of corruption and bribery in the Company's relations with public officials;
- refer to the Board of Directors the most serious cases of violations of the Anti-Corruption Policy, the General Anti-Bribery Policy and the Code of Conduct;
- analyze specific cases where results of due diligence and integrity assessments present high risk.

4.9.10. Regional Management and Anti-Bribery Compliance Functions performed in the Sustainable Valuation Units (UVS)

Ensure, through anti-bribery management systems and the Sustainable Integrity Program - PIS, the dissemination of culture, values and ethical principles and conduct, ensuring that they are complied with, and must report to the Board Legal, Compliance and Risk Management the performance of the Anti-Bribery Management System, being authorized to:

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- oversee the design, implementation and improvement of the Anti-Corruption Management System;
- provide advice and guidance to staff on the Anti-Corruption Management system and compliance issues;
- ensure that the Anti-Corruption Management system complies with the requirements of ABNT NBR ISO 37001 and ISO 37301;
- report the results of the Anti-Corruption Management System to the Senior Management, Solví's Compliance Function and other functions as appropriate;
- ensure that anti-corruption objectives are achieved and, where not, that the necessary measures are taken for that purpose;
- take any other action concerning the continuation of acts of corruption, bribery and fraud;
- manage the assurance of conducting internal audits, critical analysis by Senior Management and compliance function;
- collaborate with the Compliance and Conduct Committee with the conduct and analysis of violations committed by employees and business partners who arrive via the Reporting Channel or who have been identified by internal means;
- have full and free access to the Board of Directors, the Senior Management and the Conduct Committee if any question or concern needs to be raised regarding bribery or the management system.

5 - DISPOSIÇÕES GERAIS

5.1. The content of this Policy is the property of the Solví Group and should not be disclosed or made available to any other persons, companies, entities and/or external parties.

5.2. This Policy cancels and supersedes all prior guidelines on the subject, whether oral or written. This Policy is effective on the date of its publication.

5.3. This Policy will be revisited annually by the manager responsible for the process, assisted by the Holding's Internal Controls area, and will be updated whenever there are changes in the guidelines related to internal controls dealt with herein.

5.4. The managers of the jointly controlled and controlled companies shall, at any time, make suggestions for improvement of this Policy to the Holding's Internal Audit, whenever they detect detachment between best practices, current legislation and/or regulations, that have not been contemplated in the current version of this Policy.

6 - CANAIS DE DENÚNCIA

6.1. The Solví Group encourages its Employees and Third Parties to report to the Reporting Channel, securely and, if desired, anonymously, any conduct contrary to this Policy. The Reporting Channel may be accessed through the following channels:

- Website: <https://canalconfidencial.com.br/codigodecondutasolvi/>
- United States: 0800 721-0742
- Argentina: 0800 333 0776
- Peru 0800 555 89
- E-mail: comite.conduta@Solví.com
- Letter: Addressed to Solví - Committee of Conduct: Caixa Postal nº 31.256 - São Paulo - SP

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6.2. Employees and Third Parties are assured of confidentiality, not being retaliated for the use of the right to report and confidentiality to the extent possible, both identity and content of the communication formalized through the Whistleblowing Channel.

6.3. The employees of the Solví Group must collaborate in internal investigations of violations of conduct, as well as collaborate with the Government in any investigation of suspected irregularities or violation of the law, information and documents that support its occurrence.

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