

	Reference # PCO-019	Name Anti-bribery		Date of Preparation 7/23/2020 01:49 PM
	Current Review	Responsibilities		
Version Master Copy	Date 11/10/2020 11:34 PM	Preparation Patricia Bicudo Barbosa	Critical analysis MARIANA BERNARDO DE MORAES CASSOLA, JUARA ALVES LIMA	Approval RICARDO PANDO

1 - OBJECTIVE

The purpose of SOLVÍ's Anti-bribery Policy is to describe and explain the guidelines for behavior and expected conduct in situations related to bribery and to highlight the specific requirements related to it, reinforcing the commitment to conduct all business with the highest standards of ethics and integrity.

As an Economic Group with international operations, SOLVÍ must comply with the anti-bribery and corruption laws and regulations of all the countries in which it operates, being subordinate and subject to the local requirements of each one of them. Any 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 liability, and to fines and penalties established in specific legislation.

2 - USERS

This Corporate Policy applies to all Employees of Solví Companies, including the Holding and CSC and the Head Offices of Solví's Directly Controlled Companies and to joint subsidiaries in which its adoption must be subject to approval by its Board of Directors or equivalent body.

Solví's Anti-bribery Policy applies to all employees of all controlled companies, in all their operations in the countries in which it operates, obliging them to conduct SOLVÍ's business in an ethical manner, with absolute integrity.

It is expressly prohibited the interaction of Employees and Third Parties with the Government, which intends to give, offer or promise, directly or through Third Parties, undue advantage to any Public Agent or person related to it, in order to perform or omit an act in violation of their functional duties.

As well as, in the private sphere, interaction by Employees, Third Parties, which directly or indirectly may characterize the requirement or request of undue advantage, for their own favor or for the benefit of Business Partners, is also prohibited.

3 - TERMS AND DEFINITIONS

- **ABNT NBR ISO 37001** –The "Anti-bribery Management Systems" standard aims to support organizations in their fight against corruption (anti-corruption actions), creating a model of integrity, transparency, and compliance.
- **Brazilian Corporate Anti-Corruption Law** - Federal Law No. 12.846/2013, enacted in August 2013 and providing for the objective administrative and civil liability of legal entities for the practice of acts of corruption against the public administration, national or foreign.
- **Legislative Decree Peru** – Decree No. 1352/2018 corporate responsibility for existing criminal offenses related to corruption, money laundering and terrorist financing.
- **Argentina Anti-Corruption Law** - Law No. 27.401/2017 - Criminal liability applicable to legal entities governed by private law, national or foreign, when they commit corruption offenses against the public administration, such as bribery and influence peddling, negotiations incompatible with the public service, enrichment, and the realization of apocryphal balances in companies.
- **Bolivia Anti-Corruption Law** – Law No. 004/2010 - Establish mechanisms and procedures within the scope of the Political Constitution of the State, laws, treaties, and international conventions, aiming to prevent, investigate, prosecute and punish acts of corruption.

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- **Bribery** – Offer, promise, donation, acceptance, or solicitation of an undue advantage of any amount (which may be financial or non-financial) directly or indirectly and regardless of location, in violation of applicable laws as an incentive or reward for a person who is acting or failing to act in relation to the performance of its obligations.
- **Anti-bribery Management System** – A 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.
- **PIS** – Sustainable Integrity Program – Its purpose is to strengthen the ethical behavior of all the company's professionals, in the relationship with all interested parties, in the internal and external environment.

4 - DESCRIPTION

This Policy is in line with the fulfillment of our Mission and Vision, as well as respect for Solvi's Corporate Values, which define our identity and that of our direct and indirect subsidiaries. All commitments expressed through regulations, policies and procedures that make up the Sustainable Integrity Program (PIS) are closely linked to the commitment to respect the 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 Solvi Participações and its direct and indirect subsidiaries.

4.1. ANTI-BRIBERY COMMITMENT

It is the responsibility of all employees of SOLVÍ and its wholly owned or joint ventures to ensure compliance with this Anti-bribery Policy.

Our core standards are:

- Bribery is prohibited;
- Compliance with codes, policies, procedures and other internal rules is mandatory, in particular, for the purpose of the subject 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;
- Continuously improve the Anti-bribery Management System

Solvi encourages its Employees and Third Parties to report to the Whistleblower Channel, securely and, if desired, anonymously, any conduct contrary to this Policy. The Complaint Channel can be accessed through the following channels:

- Website: codigodecondutaSolvi.com Brazil: 0800 721-0742
- Argentina: 0800 333 0776
- Bolivia 800 100 146
- Peru 0800 555 89
- E-mail: comite.conduta@solvi.com
- Mail: Addressed to Solvi - Conduct Committee: PO Box No. 31,256 – São Paulo – SP

In case of knowledge or suspicion of bribery practices, employees are committed to reporting such situation to confidential integrity channels.

Employees and Third Parties who complainant is assured confidentiality as to their identity and non-retaliation for the use of the right to report.

Whenever requested by the Solvi Conduct Committee or the Controlled Company's Conduct Committee, Solvi Group employees must collaborate with internal investigations of conduct violations, as well as collaborate with the Government

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in any investigation of suspected irregularities or violations of the law, helping to obtain information and documents that support their occurrence.

4.2. AUTHORITIES AND RESPONSIBILITIES

4.2.1 – Legal and Compliance Department

Regarding the Anti-bribery Management System, the Legal and Compliance Director and her team are authorized to:

- Have access to all functions, records, property and personnel of Solví and other direct and jointly controlled companies, considering the availability of the people involved;
- Have full and free access to the Board of Directors, Senior Management and the Conduct Committee if any question or concern needs to be raised in relation to bribery or the anti-bribery management system;
- Allocate resources and apply the techniques required to achieve SOLVÍ's anti-bribery objectives;
- Obtain the necessary assistance from employees in the various Solví areas and their direct and joint controlled companies;
- Oversee the design, implementation and improvement of the Anti-bribery Management system;
- Provide advice and guidance to staff on the Anti-bribery Management system and Anti-bribery issues;
- Ensure that the Anti-bribery Management system complies with the requirements of ABNT NBR ISO 37001; Report the results of the Anti-bribery Management System to the Board of Directors, Senior Management and other functions as appropriate;
- Ensure the prompt interruption of irregularities and timely remediation of the situation; Take any
- other action relating to the continuation of acts of corruption, bribery and fraud;
- Ensure that those involved in acts of corruption, bribery and fraud are punished in accordance with Solví's guidelines
- This department has the Compliance function in the Anti-bribery Management System with autonomy and independence to report directly to higher levels.

4.2.2 Financial and Risk Board

Regarding the Anti-bribery Management System, the Chief Financial and Risk Officer and her team are authorized to:

- Have access to all functions, records, property and personnel of Solví and other direct and jointly controlled companies, considering the availability of the people involved;
- Obtain the necessary assistance from employees in the various Solví areas and their direct and joint controlled companies;
- Execute and maintain SOLVÍ's risk analyses, develop and improve internal controls and conduct internal audits, as well as monitor the resulting action plans until they are fulfilled;
- Provide support to the Legal and Compliance Director and her team to report the results of the Anti-bribery Management System, to the Board of Directors, Senior Management, and other functions, whenever necessary.

4.2.3 Conduct Committee

Advisory body of the Board of Directors of the SOLVÍ Group is the higher level responsible for analyzing and addressing the application of consequences to occurrences of violations of the Code of Conduct, has the following responsibilities:

- Receive, analyze information on the Anti-bribery Management System and define actions based on the critical analyzes carried out;
- Analyze issues involving ethical values and conduct of the Group's companies;
- Address appropriate disciplinary measures and, when applicable in more serious cases, submit these measures for deliberation by the Board of Directors;
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4.2.4 Integrity Commission

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Corporate executive body, responsible for promoting the continuous strengthening of PIS - Solví Sustainable Integrity Program and for guaranteeing the existence of the same type of Program, in the image and similarity of PIS Solví, in each company and branch belonging to the Group.

It acts on behalf of Solvi's Executive Board, sponsored by the Board of Directors to whom it periodically reports its activities, and has the following responsibilities:

- Creation or improvement of policies and procedures related to the Sustainable Integrity Program Promotion of corporate
- actions aimed at the effectiveness of Compliance Risk Management
- Periodic evaluation of the activities and effective results of the monitoring carried out by the Controllershship and the Internal Audit
- Monitoring the performance of the Whistleblower Channel and evaluating the application of the Proposition Consequences
- Policy, monitoring the implementation, and evaluating the results obtained with improvements in Processes and Internal Controls
- Proposing, monitoring the implementation, and evaluating the results of new training or reinforcements Proposing and
- monitoring the implementation of Communication actions for internal and external audiences

4.2.5 Administrative Council

The Board of Directors' mission is to protect and enhance the Company's assets and maximize the return on investment. It is a collegiate body of the Company, which aims to establish the general orientation of the Company's business and decide on strategic issues.

Regarding the Anti-bribery Management System, the Board of Directors has the prerogative of:

- Receive and critically analyze at planned intervals information on the content and operation of Solvi's Anti-bribery Management system;
- Require that adequate and appropriate resources necessary for the effective operation of Solvi's Anti-Bribery Management system are allocated and allocated;
- Exercise reasonable supervision over the implementation of Solvi's Anti-Bribery Management system.

4.2.6 Executive Board

Solvi's Chief Executive Officer aims to ensure, through management and governance systems, the dissemination of the Company's ethical values and principles and conduct and ensure that they are complied with.

With respect to the Anti-bribery Management System, the Executive Board shall:

- Ensure that the organization's strategy and Solvi's Anti-bribery Policy are aligned;
- Ensure the integration of the requirements of the Anti-bribery Management system in the organization'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 properly 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 and implementation of Solvi's Integrity Program, established to mitigate risks of corruption and bribery in the Company's relations with public agents;
- Refer the most serious cases of violations of the Anti-Corruption Policy, the General Anti-bribery Policy and the Code of Conduct to the attention of the Board of Directors.
- Analyze specific cases where due diligence results and integrity assessments present high risk.

4.3. CONSEQUENCES OF FAILURE TO COMPLY WITH THE ANTI-BRIBERY POLICY

4.3.1 Sanctions applicable to SOLVÍ and Employees

SOLVÍ's Anti-bribery Policy takes into account that SOLVÍ or its companies and its Employees may be investigated through the regulatory bodies of different jurisdictions, and, depending on the circumstances, prosecuted administratively, civilly and/or criminally. Any Employee found in violation of the Anti-bribery Policy will be subject to disciplinary measures, applied from

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in accordance with the laws and other policies of SOLVI and its subsidiaries.

4.3.2 Sanctions applicable to Third Parties

Agents, consultants and third parties hired and/or working for SOLVÍ regardless of contract, found in violation of the Anti-bribery Policy, will be subject to the termination of their commercial relationship with the Group companies, without prejudice to the necessary remedial, administrative, and legal measures applicable in light of the violation committed.

5 - GENERAL PROVISIONS

All matters described in this Policy are Solví's property and must not be disclosed or made available to any other persons, firms, entities and/or external parties, except in cases previously analyzed and formally approved.

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

The leaders of the controlled and jointly controlled companies must, at any time, make suggestions to improve this Policy whenever they detect a discrepancy between best practices, current legislation and/or regulations, which have not been contemplated in the current version of this Policy.

6 - WHISTLEBLOWING CHANNELS

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

- Website: codigodecondutaSolví.com
- Brazil: 0800 721-0742
- Argentina: 0800 333 0776
- Bolivia 800 100 146
- Peru 0800 555 89
- E-mail: comite.conduta@Solví.com
- Mail: Addressed to Solvi - Conduct Committee: PO Box No. 31,256 – São Paulo – SP

Employees and Third Parties are assured confidentiality, not being retaliated against for the use of the right to denounce and confidentiality as far as possible, both regarding identity and the content of the communication formalized through the Whistleblower Channel.

Employees of the Solví Group must collaborate in internal investigations of conduct violations, as well as collaborate with the Government in any investigation of suspected irregularities or violations of the law, helping to obtain information and documents that support their occurrence.

7 - Control of forms / attachments

Number Description Storage Protection Recovery Retention Disposition

PCO-019(EN)	Anti-bribery		Digital	BACKUP	By number	Indefinite	Delete	File
PCO-019(ES)	Anti-bribery		Digital	BACKUP	By number	Indefinite	Delete	File
ANEXO-01	Anti-bribery policy - commitments	Digital	BACKUP	By number	Undetermined	Delete	File	PCO-019-

@ Traceability

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