

**RULES FOR GIFTS,
GIFTS AND CORPORATE COURTESY
BMV GLOBAL GROUP**

1. OBJECTIVE

The objective of this Policy is to provide guidelines for conduct and guidance for decision-making on employees and third parties who interact with the BMV Global Group, in order to reinforce and promote high standards of transparency, ethics and integrity, especially in receiving and granting gifts, presents and corporate courtesies arising from professional relationships with agents public or private, always in accordance with our Mission, Vision and Principles, our standards internal regulations and current legislation, in Brazil or abroad.

This Policy must be read and interpreted in conjunction with the **code of Conduct** and other policies and internal procedures related to **BMV Global Group Integrity Program**.

2. APPLICATION AND SCOPE

The guidelines of this Policy apply to all employees of the BMV Global Group, in any hierarchical level, in the exercise of their functions, leaders and employees. They also apply to third parties that have a relationship with the BMV Global Group, such as partners, suppliers and service providers, network members, co-investors or any public that relate to the aforementioned organizations.

3. GUIDELINES

3.1 GENERAL GUIDELINES

The BMV Global Group believes in training leaders who act with social impact to overcome Brazil's greatest challenges, always having as a reference our Principles and compliance with standards, internal or external. Therefore, we do not tolerate corruptive acts under any circumstances, including facilitation payments, in Public Sector, Private Sector or Third Sector, without any distinction, as established in **Anti-Corruption Policy** of the BMV Global Group.

Corruption happens whenever someone gives or receives an undue advantage, mainly to who practices or fails to practice a certain conduct. We must be careful with all cases that involve promising, offering, giving or authorizing, as well as requesting, receiving or accepting promise of resources or money, but also gifts, presents and corporate courtesies, which are represent undue advantages.

It is not every situation in which the receipt or granting of gifts, gifts and other courtesies corporate entities constitutes an undue advantage. All over the world, especially in Brazilian culture, giving and receiving gifts and gifts is a common cordiality practice, which symbolizes kindness and appreciation.

Thus, some situations have legitimacy and legality, when conducted appropriately, reasonable, transparent, ethical and legal, especially because it does not interfere with the decision-making capacity of agents involved. However, in some situations these characteristics may be lost, representing an undue advantage. Subjectivity can be problematic, as reasonableness and legality tend to vary from person to person. person or according to aspects of tradition and culture.

Therefore, this Policy aims to regulate, in the institutional design of the BMV Global Group, to situations in which these transactions are legitimate and authorized.

SITUATIONS THAT ARE DISCREPANT FROM THE REFERENCE PARAMETERS OF THIS POLICY MUST BE EXPRESSLY COMMUNICATED TO THE COMPLIANCE OFFICER OF THE BMV GLOBAL GROUP, AS WELL AS APPROVED BY THE ORGANIZATION'S EXECUTIVE DIRECTOR (CEO), PREFERABLY BEFORE RECEIVED, GRANTED OR AUTHORIZED, THROUGH THE GIFTS, PRESENTS AND CORPORATE COURTESIES.

3.2. SPECIFIC GUIDELINES

BMV Global Group expects that everyone acting on its behalf or representation will carry out all actions and decisions in an ethical, integral and transparent manner, especially in reference parameters presented below.

BMV Global Group prohibits and repudiates the receipt or granting of gifts, presents or courtesies corporate entities, even if they do not have economic value or are in accordance with the parameters of reference to this Policy, when there is an intention (declared or concealed) to influence or pressure a commercial or institutional decision, or aim for present or future rewards, conditional unduly offering undue advantages and business or relationship opportunities.

Therefore, for them to be permitted, in addition to observing the reference parameters, they must observe the following requirements:

- Be received or granted in good faith, in an appropriate and reasonable manner, in accordance with all applicable laws and regulations;
- Transparency in the relationship between the parties must be respected;
- Not be received or granted with the intention or possibility of influencing decision-making or other conduct on the part of the recipient, which is not capable of giving rise to this interpretation;
- Not being able to appear or characterize an exchange of favors between the parties involved;
- And it cannot be in cash or equivalent (example: gift certificate, bank transfer, etc. others).

3.2.1. Receipts and Grants of Gifts

Gifts are goods, with no commercial value, generally distributed as a courtesy, advertising or publicity institutional, which contain the names and logos of the BMV Global Group, when granted by these; or third parties, such as partners, public or private agents, suppliers, service providers, services, co-investors or assisted organizations, when received. Examples of gifts are: notebook, notepad, diary, backpack, pen, pencil, keychain, calendar, t-shirt, cup, mug, pendrive, institutional materials, magazine, among others. It is worth mentioning that institutional materials They are not characterized as gifts (example: annual report, practical guide, among others).

BMV Global Group does not prohibit the receipt and giving of gifts, as long as it is observed and respected the concept of this Policy (item without commercial value), as well as the requirements above mentioned and the reference parameters: **maximum added value of R\$ 240.00 (two hundred and forty reais), per person granting and receiving, within a minimum period of 06 (six) months.** If the value exceeding it is necessary to consult the **Chief Compliance Officer of BMV Global Group** before to purchase or accept the gift.

Items coated with economic value, even if they contain names and logos of the grantor, do not fall within the concept of a gift in this Policy and are not authorized (example: computer, cell phone, car, among others). In relationships with public or private agents, all employees, partners, suppliers, service providers and other third parties acting on behalf or in the interest of the BMV Global Group are prohibited from accepting, offering, giving or authorizing the concession, as well as receiving, demanding, accepting promises or authorize the receipt of gifts with the aim of obtaining an advantage, influencing or compensating decisions, for their own benefit or that of the organization. Furthermore, gifts containing information relating to parties will not be permitted, under any circumstances. politicians or candidates, with the aim of promoting an electoral campaign.

3.2.2. Receiving and Giving Gifts

Gifts are corporate institutional courtesies, received or given free of charge, but which **have commercial value**, even if they have no value or are insignificant to the person offering it. They are examples of gifts: book, commemorative date basket, box of chocolates or bonbons, panettone, perfumes and cosmetics, cell phone accessories, among others. It is worth mentioning that institutional materials are not characterized as gifts (example: annual report, practical guide, among others). Gifts must be intended **preferably** to legal entities and not to an individual specific.

In the relationship between private agents, such as employees, partners, suppliers, service providers of services, co-investors and third parties acting on behalf or in the interest of the BMV Global Group, are The receipt and granting of gifts is permitted, as long as the parameters of reference: **maximum aggregate value of R\$ 240.00 (two hundred and forty reais), per person granting and receives, within a minimum period of 06 (six) months.**

Employees and third parties acting on behalf or in the interest of the BMV Global Group are not authorized to grant gifts to public agents, except in cases of:

- foreign authorities, which, for protocol reasons, require reciprocity; or
- items given as courtesy, advertising, regular publicity or on the occasion of events special events or commemorative dates, as long as they do not exceed, without exception, the parameters of reference: value of R\$ 240.00 (two hundred and forty reais, per public agent person, in the interval minimum period of 06 (six) months.

In relationships with public or private agents, all employees, partners, suppliers, service providers and other third parties acting on behalf or in the interest of the BMV Global Group are prohibited from accepting, offering, giving or authorizing the concession, as well as receiving, demanding, accepting promises or authorize the receipt of a gift with the aim of obtaining an advantage, influencing or compensating decisions, for their own benefit or that of the organization.

Furthermore, under no circumstances will it be permitted to **gifts with information regarding parties politicians or candidates, with the aim of promoting an electoral campaign.**

All gifts offered and received that exceed the value or exceed the reference parameters of this Policy, must be expressly communicated to the **Compliance Officer of BMV Global Group**, as well as approved by the organization's executive director (CEO), preferably before received, granted or authorized, through the **Gifts, Presents and Courtesies Form Corporate.**

Those gifts eventually received, which exceed the value or beyond the parameters of reference to this Policy, which are not authorized and cannot be returned, will be converted in assets of the BMV Global Group, which may be used as it deems appropriate, such as donation to a charitable organization, raffle among employees or personal use.

3.2.3. Receipts and Grants of other Corporate Courtesies

Other types of corporate courtesies may eventually be granted or received, such as funding for congresses, fairs, training, training courses, workshops and others. In these cases, situations need to be assessed individually, and must be expressly communicated to the **Compliance Officer of BMV Global**

Group, as approved by the executive director (CEO) of organization, before received, granted or authorized, through the **Gift Form, Corporate Gifts and Courtesies**.

Entertainment activities, such as tickets to sporting events, festivals and music shows, theater, cinema, and several other activities that may or may not be of a corporate nature are not authorized and, any specific issues, must also be submitted for assessment, in the form mentioned in the previous paragraph. In relationships with public or private agents, all employees, partners, suppliers, service providers and other third parties acting on behalf or in the interest of the BMV Global Group are prohibited from accepting, offering, giving or authorizing the concession, as well as receiving, demanding, accepting promises or authorize the receipt of courtesies with the aim of obtaining an advantage, influencing or compensating decisions, for their own benefit or that of the organization.

Sometimes, events led or supported by the BMV Global Group, such as training, training, lectures, conferences and others, involve the cost of travel (transport, hospitality and other expenses) to partners, third parties or even public agents and former public agents. Like this, whenever the cost involves transport and accommodation, it is necessary to consult the Travel Policy, BMV Global Group Events and Hospitality, which presents specific parameters and criteria for these situations.

4. RESPONSIBILITY

The responsibility for managing, monitoring, applying and updating this Policy lies with the **Compliance Officer of BMV Global Group** and oversight of **Governance, Risks and Compliance Committee**.

4.1. Leadership Engagement

If you are a leader, you must lead by example. Guide your team, including the arrival of a new member, discuss the Code of Conduct, this Policy and ethical issues, in any and all situation where this is possible. Never cover up or ignore situations and problems of an ethical nature. Encourage communication among your team and thank them when they bring up ethical dilemmas. It's important highlight that Leadership cannot reprimand or pressure any employee for making a communication or contribute to an investigation process.

5. ACCEPTANCE OF THE POLICY

Every employee or third party acting on behalf or in the interest of the BMV Global Group must analyze this Policy and commit to adhering to its terms and conditions.

6. CONFIDENTIAL LISTENING CHANNEL

Confidential Listening Channel relates directly to the **Integrity Program BMV Group Global**. Thus, suspected irregularities and violations of the Code of Employee Conduct, Partner Code of Conduct, Supplier Code of Conduct and Service Providers, to this and other Policies, Procedures and internal standards, as well as to the current legislation, in Brazil and abroad, applicable to organizations.

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The BMV Global Group is committed to impartially and confidentially analyzing all reports received. The phases of managing reports received, as well as the respective responsibilities of involved in operationalization, management and decision-making, from receipt to archiving and monitoring, are formalized in the Confidential Listening Channel Management Procedure. After receiving, recording and initial screening of the report, the need for initiation of an internal investigation.

7. DEFINITIONS

INTEGRITY PROGRAM: Set of internal mechanisms and processes, systematized and methodologically established and managed, aimed at prevention, detection and responses to risks of organizations' compliance (for example: assessment and management of compliance risks; code of internal conduct, policies and procedures; confidential listening channel, internal investigations; communications and training, due diligence etc.), based on continuous improvement and the formation of a organizational culture based on the highest standards of ethics and integrity.

GOVERNANCE, RISKS AND COMPLIANCE COMMITTEE: collegiate body, duly constituted, which coordinates and directs actions related to the implementation and management of best practices Corporate Governance, Risk Management and Integrity Program. Deliberates issues strategies, supervises the execution of projects, institutionalizes and encourages discussions and structures related to the aforementioned themes, in order to apply, safeguard and enforce the mission, vision and principles of organizations, to stimulate and develop their organizational culture.

CODE OF CONDUCT: main policy related to the BMV Group Integrity Program Global, which provides general behavioral guidelines for people who are part of or participate in relate to organizations. It is aimed at different audiences: Employees, Partners, Suppliers and Providers.

PASSIVE CORRUPTION: when a person, collaborator or third party who acts in the name or interest of the BMV Global Group, or related persons, receives, demands, accepts a promise or authorizes the receipt of undue advantage, from a public or private agent, especially for him to practice or stop carrying out one or more acts, whether legal or not.

UNDUE ADVANTAGE: can be configured through financial resources or assets, such as cash in type and financial transactions, or concessions of economic-financial value, direct or indirect, such as, but not limited to, gifts, hospitality expenses (tickets, accommodation, transfers, meals, entertainment), courses and training, indications for positions or jobs, loans, guarantees, donations, sponsorships.

PUBLIC ADMINISTRATION: bodies, entities and other legal entities, including those of a businesswoman, whether of a direct nature (Union, States, Federal District or Municipalities, in addition to their correspondence in foreign States), whether of an indirect nature (public foundations, authorities, regulatory agencies, state-owned companies, in addition to their correspondence in foreign states), any Power (Executive, Legislative or Judiciary).

PUBLIC AGENT: person who performs a role in the Brazilian or foreign public administration, even if unpaid or transitory, exercised via election, hiring, public competition, appointment or any other form of bond or investiture. Anyone who holds a position, job or function in a parastatal entity and anyone who works for a service provider company hired or partnered to carry out activities typical of Public Administration.

PRIVATE AGENT: person who performs a function in the private or third sector, national or foreigner, even if unpaid or temporary, who does not qualify as a public agent.

FACILITATION PAYMENTS: also known as payments for routine acts or fees streamlining, are financial disbursements destined directly or indirectly to public agents aiming speed up, delay or ignore bureaucratic governmental acts under their responsibility or under the which have influence.

RELATED PERSON: natural and legal persons who can relate to an individual, such as relatives (spouse, partner, parents, grandparents, children, grandchildren, father-in-law or mother-in-law, stepson or stepdaughter, brothers and sisters, brother-in-law or sister-in-law, nephew or niece), friends, companies

(partners or joint ownership in companies, with or without legal personality, that the individual owns agent or has any other type of close relationship of public knowledge, even if as hidden final beneficiary) or other close relationships by affinity, relatives or society.

GIFTS, GIFTS AND CORPORATE COURTESIES POLICY: internal rule related to the Program of Integrity of the BMV Global Group, which guides employees and third parties on the receipt and granting gifts, presents and other corporate courtesies.

INSTITUTIONAL AND CONTRACTUAL RELATIONSHIP POLICY WITH PUBLIC AUTHORITY: internal standard related to the BMV Global Group Integrity Program, which guides employees and third parties on the Institutional and Contractual Relationship with Public Power.

CONFLICT OF INTEREST PREVENTION POLICY: internal rule related to the Integrity of the BMV Global Group, which guides employees and third parties on situations that may generate conflict of interests.

TRAVEL, EVENTS AND HOSPITALITY POLICY: internal rule related to the BMV Global Group Integrity, which guides employees and third parties on receiving and travel, event and hospitality concessions, such as tickets, accommodation, transfers, meals, entertainment.