

**RECEPTION STANDARD AND
COMPLAINTS TREATMENT
BMV GLOBAL GROUP**

1. OBJECTIVE

1.1. This document establishes the rules on the reception and handling of complaints, related to the possible commission of illegal practices by any administrators, counselors, employees, interns, minor apprentices, outsourced workers, and service providers/suppliers.

2. REFERENCES

- a) Bylaws of the BMV Global Group;
- b) BMV Global Group Code of Ethical Conduct;
- c) Policy Compliance;
- d) BMV Global Group's Risk Management and Internal Controls Policy;
- e) Anti-Corruption Law (Law No. 12,846 of August 1, 2013), as well as applicable legislation;
- f) ABNT ISO 37001- Anti-Bribery Management Systems;
- g) ABNT ISO 37002 – Guidelines for Complaints Management Systems;
- h) ABNT ISO 37301 - Management Systems Compliance.

3. SCOPE OF APPLICATION

3.1. The provisions of this Standard are addressed to all members of the BMV Global Group, including all its directors, advisors and employees, located at headquarters or branches. Where applicable, this Standard also applies to outsourced workers and service providers.

4. DEFINITIONS

Administrator: person or group of people who directs and controls an organization at the highest level, this concept being restricted to members of the Council and Executive Board.

Code of Ethical Conduct: corporate instrument, approved by the Board, which provides for the principles, values, mission of the company and prohibition of acts of corruption and fraud, establishes parameters of conduct and provides guidance on the prevention of conflicts of interest.

Retaliation: reaction of revenge for reporting an irregularity..

Complaint: is a type of manifestation whose objective is to provide information about some fact related to conduct that is in non-compliance with the laws, the BMV Global Group Code of Conduct and other policies.

Ethics Committee: is a multidisciplinary team with the responsibility of ensuring compliance with the standards and procedures established in the Code of Ethical Conduct and other related policies.

5. GUIDELINES AND PROCEDURES

5.1. Reportable behavior

The Reporting Channel is one of the pillars of the Reporting Program Compliance of the BMV Global Group, representing an important tool for strengthening corporate governance in the company. This tool aims to receive complaints regarding facts that may be in disagreement with the Compliance of the BMV Global Group, in particular its Code of Ethical Conduct, internal policies and procedures, and with current legislation, including cases of suspected fraud, bribery, misconduct and any other attitudes that may negatively expose the company's image. The Reporting Channel is managed by the Risk and Compliance Management, which is responsible for receiving, analyzing and responding appropriately to reports, directing corrective and preventive actions.

5.1.1. All administrators, employees and business partners must use the Reporting Channel whenever they suspect or know of something contrary to the principles of ethics and integrity. Use must be made under the principle of good faith, that is, the use of the channel to engage in intrigue, slander, purposely reporting lies or retaliation of any nature is not tolerated. It is up to the BMV Global Group, in turn, to create all other conditions for the credibility of this tool and its effective use. In short, this rule is applicable to receiving complaints related to topics such as:

- Harassment (sexual or moral);
- Conflict of interests;
- Corruption;
- Non-compliance with the Code of Conduct, internal rules and legislation;

- Discrimination;
- Fraud;
- Money laundering;
- Tax evasion;
- Bribery;
- Information Leakage.

5.1.2. The communication of signs of illegality must, whenever possible, be accompanied by detailed information, such as an adequate description of the facts, people and institutions involved and the evidence that points to them. When making a complaint, the complainant must ensure as much as possible the veracity of the facts and the involvement of the people mentioned, thus avoiding situations that could cause embarrassment or undue exposure of these people.

5.1.3. In cases where bad faith or false reporting is proven, disciplinary sanctions must be applied and, as appropriate, legal measures may be adopted against the complainant.

5.1.4. The Reporting Channel will protect the identity and integrity of the complainant, with the option of anonymity always being guaranteed.

5.1.5. The Reporting Channel should not be used to register requests, complaints about products and services. For this purpose, the Relationship and Customer Service Center is available.

5.1.6. Any and all communications regarding violations of current legislation, the Code of Conduct, the policies and procedures of the BMV Global Group will be treated confidentially, with the exception of those in which there is a legal obligation to inform the authorities.

5.2. Communication Channels

The following communication channel is available to employees, suppliers and partners:

- Email: ouvidoria@bmv.global

5.3. Communication

The BMV Global Group must plan and define a communication plan that covers all target audiences that could potentially make a complaint. Based on this plan, the BMV Global Group must carry out communication, awareness-raising and/or training activities, seeking to ensure that everyone is fully aware of how to access the Reporting Channel and the importance of doing so, if they become aware of any action contrary to current legislation, the Code of Conduct, as well as the policies and procedures of the BMV Global Group committed by administrators, employees, providers, suppliers, or business partners.

5.4. Receiving and handling complaints

5.4.1. Complaints received will be analyzed and evaluated. If they have provenance, they will be investigated and the area of Compliance will report such complaint to the Ethics Committee.

5.4.2. If a complaint cannot be forwarded or continued due to lack of information provision, the Reporting Manager Compliance may reasonably close the process. Therefore, it is essential that the report or complaint is as clear as possible, with the presentation of all existing evidence regarding the fact discovered. Whenever possible, it is important to include the date, time and location of the incident.

5.4.3. If the investigation confirms that there has been a failure to comply with the standards established by the Code of Ethical Conduct and Conduct, policies and procedures Compliance, laws or internal regulations, the BMV Global Group will provide corrective action that may include anything from disciplinary action to termination of the employment contract, as well as any other corrective action it deems appropriate, complying with the criteria established in a specific Standard.

5.5. Fact Finding and Sanctions

5.5.1. The area of Compliance is responsible for conducting the investigation of reports and has broad powers to carry it out in any area or department of the BMV Global Group, directly or indirectly, alone or jointly.

5.5.2. If it is not possible to analyze suspicious activities internally, the BMV Global Group may resort to external consultancy after approval by the competent bodies.

5.5.3. Nonconformities that become known to the Commission and area of Compliance, by other means, such as carrying out an audit, must also be investigated. During the entire procedure and after its completion, the documents will remain confidential, regardless of the complainant's choice to identify them. Only professionals Compliance, members of the Ethics Committee and company administrators, researchers, lawyers who should be aware of the information will have access to the process. The complainant, in turn, will receive the registration number of the complaint he made in order to follow it on the company's website, which will only contain the procedural progress and general information about the process.

5.5.4. In cases where there is a legal obligation to communicate information to public bodies responsible for criminal proceedings, Legal Consulting will support the area of Compliance to forward the report to the competent authority.

5.5.5. The investigation of reports must be carried out through procedures that include, for example: collection of documents; collection of company-provided devices, such as computers, cell phones and tablets; comparison of data with existing records; analysis of the history and carrying out interviews deemed necessary with any member, members of the Council, Commission and Management, without the need to request prior authorization; etc.

5.5.6. The investigation must be limited to investigating the facts, fully determining whether there was improper conduct or not, who was involved and under what circumstances. The investigation will always be independent and based on facts and data.

5.5.7. The main objectives of the investigation are to minimize risks, identify opportunities for improvement, protect the company's image and clarify the facts.

5.5.8. Any investigation must be carried out exclusively and independently by the area of Compliance or External consultancy, with the support of other areas, when deemed necessary, mainly the Legal, Information Technology and Human Resources areas.

5.5.9. All members, members of the Council, Committees, Commissions, and the Board, are obliged to cooperate, when requested, and must also maintain complete confidentiality.

5.5.10. The BMV Global Group, at all levels, must deal with matters related to complaints received quickly and effectively. The omission or creation of obstacles to the provision of data and information required by the area of Compliance for the investigation of reports constitutes a violation of this Standard and, consequently, the Code of Conduct.

5.5.11. The results of the investigations and their outcomes will be reported to the Executive Board or the Deliberative Council (the latter, when involving administrators involved), as well as recommendations for measures to mitigate the risks of new occurrences, on the occasion of their participation in collegiate meetings and, in cases considered critical by him, immediately the President of the BMV Global Group or the President of the Deliberative Council, who must judge the need or not for an extraordinary meeting of his collegiate body.

5.5.12. If an irregularity is proven, based on the opinion of the Ethics Committee, the Executive Board or even the Deliberative Council of the BMV Global Group will apply the appropriate measure to resolve the identified problem or prevent new occurrences.

5.5.13. The BMV Global Group will not disclose the details and decisions taken resulting from the investigation process.

5.6. Return to the whistleblower

5.6.1. Complaints made through the channels offered will receive a response (conclusive and/or intermediate) substantiated by the area of Compliance, whether due to the validity or unfoundedness of the allegations or, preliminarily, due to impertinence in relation to the Program of Compliance.

5.6.2. Inform about the status handling the complaint is beneficial in this process, however, respecting the confidentiality of all sensitive information. The feed back it must be succinct, simple and effectively demonstrate the stage of the process and its conclusion, without, however, revealing names, what are the applicable measures, evidence found and other details of the investigation. Even anonymous protesters must

welcome feedback. Unlike those who identify themselves and can receive feedback via telephone, e-mail or other direct means, anonymous people must be informed by some mechanism, for example, being encouraged to open a temporary e-mail account, where the response will be forwarded either through a “login” and “password”, so that the complainant can access a specific address on the Internet, and see the status of the investigative process directly.

5.7. Information Management The area responsible for the Reporting Channel must construct statistics, prepare reports, establish indicators and/or other ways to measure the performance of this process and, therefore, enable its analysis. Such information must allow verification of compliance with all commitments established by the company and whether employees are, in fact, correctly using the Reporting Channel. These assessments must be shared with Senior Management.

6. RESPONSIBILITIES

6.1. Deliberative Council

- a) Support the investigation and treatment of complaints, providing the appropriate tools to solve the problem presented, when necessary;
- b) Decide on the application of penalties when the situation involves administrators;
- c) Decide on the application of penalties for cases submitted for consideration.

6.2. Executive Board and Managers

- a) Support the investigation and treatment of complaints, providing the appropriate tools to solve the problem presented, when necessary;
- b) Guarantee non-retaliatory conduct;
- c) Encourage professionals, under its management, to use the channel to improve the integrity of the BMV Global Group.

6.3. Risk Management and Compliance

- a) Guide, publicize and practice the rules of the Reporting Channel, adopting non-retaliation conduct;

- b) Guarantee the confidentiality, independence, impartiality and impartiality of any and all communications received;
- c) Receive, investigate and analyze complaints received through any communication channel;
- d) Report identified cases to the Ethics Committee;
- e) Report reports involving administrators to the Deliberative Council;

6.4. Ethics Committee

- a) Guide, publicize and practice the Reporting Channel Policy, adopting non-retaliation conduct;
- b) Promote the legitimization, dissemination, respect, compliance and improvement of the Code of Ethical Conduct;
- c) Decide on the actions that should be adopted in relation to complaints received and investigated, when identified by the area of Compliance indications that the complaint may be relevant.

6.5. Collaborators

- a) Maintain confidentiality regarding confidential information generated or to which they have access, for the purposes of participating in the complaint investigation process;
- b) Not use/appropriate confidential information to which you have access, to generate your own benefit, present or future, or for the use of third parties;
- c) Use the Reporting Channel in an ethical and objective manner.

6.6. Business Partners

- a) Use the Reporting Channel in an ethical and objective manner.

7. FILING OF COMPLAINTS

7.1. The investigative process will be documented and archived confidentially.

7.2. All complaints will be kept in an original file with a record of their receipt, investigation and resolution. This and all documents obtained or created in connection with any investigation will be stored for five (5) years.

7.3. Access to records and any material related to the investigations will be limited to those individuals within the BMV Global Group who need to know the information, so that they can assist the Operator in the investigative process, i.e., professionals from Compliance, members of the Ethics Committee and company administrators, researchers, and/or lawyers.

8. TRAINING AND STANDARD REVIEW

8.1. The rules of this Reporting Channel will be the subject of internal training for Compliance adapted according to the target audience present at the sessions. This training will be recycled whenever necessary and especially during events with greater exposure of the company or after substantial changes in safety policies. Compliance. Document type:

8.2. Additionally, this standard must be made available on the BMV Global Group website on an easily accessible page.

8.3. Annually, this standard will be analyzed and if necessary revised taking into account its aspects, changes in legislation relating to the topic and possible structural changes within the BMV Global Group, in a continuous improvement of the company's integrity conduct.

9. GENERAL PROVISIONS

9.1. Periodic monitoring and audits may be carried out to verify the effectiveness of controls, in order to prevent non-compliance with this Standard.

9.2. Any and all situations that are not covered in this NI will be analyzed and guided by the area of Compliance, and submitted to the Executive Board if necessary.

9.3. All employees and service providers, that is, all those who fail to observe the provisions of this Standard, will be subject to disciplinary punishment and civil liability for losses caused by their actions.

10. APPROVAL/TERM

10.1 As this is an internal organizational procedure, the BMV Global Group reserves the right to change, replace, cancel or revoke this instrument unilaterally, without the need for prior communication to employees, respecting the limits set out in current Brazilian legislation.

ANNEX I

MAPPING OF THE RECEIPT AND TREATMENT PROCESS

WHAT	WHO	AS	TERM
Complaint	Whistleblower	Through the channels mentioned in this standard	-
Registration of the complaint	<i>Compliance</i>	System registration own	2 business days
Preliminary check	<i>Compliance</i>	Access to records carried out in the system	
Process instruction investigative	<i>Compliance</i> and Ethics Committee	Through from the analysis documentary and of testimonials from witnesses, the investigated, to elucidation of facts pointed out.	30 days
Preparation of Conclusive report	Ethics Committee	Issuing and sending a conclusive investigation report to the Board of Directors or the Advice Deliberative with suggestion of eventual application of penalties.	10 days
Decision	Senior Management	Analysis of the investigation and adoption report or not of the suggested measures.	10 days

ANNEX II

MAPPING THE PROCESS FOR RECEIVING AND HANDLING COMPLAINTS

