

**RELATIONSHIP POLICY WITH ENTITIES  
PRIVATE AND PUBLIC AND  
PREVENTION AGENTS TO CORRUPTION  
BMV GLOBAL GROUP**

## **RELATIONSHIP POLICY WITH ENTITIES PRIVATE AND PUBLIC AND PREVENTION AGENTS TO CORRUPTION BMV GLOBAL GROUP**

### **1. OBJECTIVE**

The Relationship with Private Entities and Public Agents and Corruption Prevention Policy (“Policy”) aims to ensure good practices in the BMV Global Group’s relationship with third parties, whether private entities or public agents, in line with the provisions of the Code of Conduct of the BMV Global Group. By implementing and following the Policy, the Company seeks to reinforce its commitment to developing relationships with high standards of integrity, ethics and transparency and to prevent and combat corruption in all its forms.

### **2. TARGET AUDIENCE**

This Policy applies to all administrators, employees and service providers of the BMV Group Global in all interactions, on behalf of the Company, with Third Parties (as defined below). Companies controlled by the BMV Global Group must reflect the principles of this Policy in their respective corruption prevention regulations, respecting any procedural peculiarities management and the level of complexity of its operations. Controlled companies that do not have regulations for the purpose of this Policy must follow the terms set out here, observing their respective management structures.

### **3. GLOSSARY**

- **Public Agent:** is anyone who works, even temporarily or without remuneration, for election, appointment, designation, hiring or any form of investiture or bond, mandate, position, job or function in government bodies, companies that are part of the public administration direct or indirect, including regulatory agencies, legislative, executive or judicial powers, in any country.
- **Illicit Acts:** acts and omissions contrary to laws or morals, such as money laundering, financing terrorism, corruption and fraud.
- **Corruption:** any and all actions that, directly or indirectly, imply a suggestion, offer, promise, request, demand, acceptance, grant (active form), or receipt (passive form), of undue advantages, whether financial or not, such as: bribery, bribery, influence peddling and favoritism; in exchange for carrying out or omitting acts inherent to their duties or facilitating of business, operations or activities, or seeking

benefits for yourself or third parties. It is also corruption any act of: (i) approval, cooperation, omission, or transmission of instructions to the carrying out the bribe or receiving its benefit, as long as it is with knowledge of the illegality of the payment or receipt of the benefit; and (ii) transaction with invoices or other receivables for the purpose of carrying out bribery or covering it up.

- **Anti-Corruption Laws:** means Federal Law nº 12,846/13, as regulated by Federal Decree nº 8,420/2015 and, as applicable, Law No. 8,429/1992 (Administrative Improbability Law) and Law No. 8,666/1993 (Tenders Law).

- **Private Entities:** is anyone with whom the BMV Global Group interacts that cannot be considered a Public Agent, including suppliers.

- **Third Parties:** means any and all third parties with whom BMV Global Group has or will have any relationship in Brazil or abroad.

#### **4. PRINCIPLES FOR RELATIONSHIPS WITH PUBLIC AGENTS AND PRIVATE ENTITIES**

The BMV Global Group is committed to interacting with Public Agents and Private Entities with ethics, morals, honesty, professionalism, transparency and in full compliance with the Laws Anti-corruption.

The relationship and interaction with any Public Agents and Private Entities must be based on best market practices, respecting the rules that govern public administration, applicable legislation and regulations, as well as the principles established in the Code of Conduct. In order to adopt best practices in compliance, BMV Global Group will formalize, in standards and procedures, rigorous standards to prevent, detect and respond to any and all attempts or Corrupt practices and other Illicit Acts.

#### **5. PREVENTING AND COMBATING PUBLIC AND PRIVATE CORRUPTION**

##### **5.1. Relationships:**

BMV Global Group's relationship with Third Parties must be based on the following guidelines:

- diligence to verify the suitability of Third Parties;
- inclusion of an anti-corruption clause in contracts signed by the BMV Global Group, as well as termination in cases of suspected acts of Corruption;
- procedures for evaluation, registration, approval, hiring and monitoring of suppliers and service providers.

##### **5.2. Diligence:**

BMV Global Group must adopt due diligence procedures in all jurisdictions in which that operates, observing:

- inclusion of clauses in contracts that keep the BMV Global Group harmless, on the part contrary, for violations of the law, including Anti-Corruption Laws, and which provide for the liability for committing acts against public administration, national or foreign;
- carrying out, in the course of mergers and acquisitions, due diligence focused on identification of signs of Corruption.

### **5.3. Risk Assessment and Monitoring:**

The administrators and employees of the BMV Global Group must assess the risks related to the topics of this Policy, assisted by the Compliance and Corporate Risks, observing the Risk Management Policy. Risk assessments should take into account aspects related to interactions with the public and private sector, in addition to nature of the transaction.

- only the appointment and hiring of former Public Agents who have already fulfilled the period of “quarantine”, as established in art. 6th, item II, of the Conflict of Interest Law for Public Agents (Law nº 12,813/2013).

## **6. RULES FOR RELATIONSHIPS WITH PUBLIC AGENTS and PRIVATE ENTITIES**

**6.1.** The following general rules must be observed by the Group's administrators and employees BMV Global in any type of relationship with Public Agents and Private Entities, including its advisors, directly or through third parties that may be hired by the BMV Group Global or that represent it:

**6.1.1.** The BMV Global Group must not allow, after becoming aware of the conduct, that any Public Agent or Private Entity receives, offers or requests bribes, kickbacks, payments for facilitation or other illicit payments from BMV Global Group or Third Parties. The administrators, employees or service providers of the BMV Global Group who become aware of an event that raises suspicion of any of the conduct mentioned, they must report the event to the People and Ethics Commission or the reporting channel for investigation and determination of appropriate measures, including termination of the relationship with the Private Entity or Public Agent and reporting to the bodies applicable. In the event of omission by the Group's administrator, employee or service provider BMV Global, this will be subject to the penalties provided for in this Policy.

**6.1.2.** The administrators, employees and service providers of the BMV Global Group have obligation to diligently select all Public Agents and Private Entities with whom the Company develop any

type of relationship, which must comply with legislation and applicable regulations, including Anti-Corruption Laws and compliance of the BMV Group Global.

**6.1.3.** It is not permitted to interfere with or hinder supervision or investigation by any public, supervisory or regulatory bodies.

**6.1.4.** It is not permitted to accept, offer, promise, deliver, directly or through Third parties, economic benefits or undue advantages of any kind to Public Agents and Private Entities as a way to facilitate and/or obtain business, omit acts or obtain benefits, even other than indirect, for the BMV Global Group, such as obtaining authorizations, licenses, permissions and certificates.

**6.1.5.** It is not permitted to practice or contribute to acts that could be considered harmful to the public administration.

**6.1.6.** Government relations activities must be carried out in an impartial and independent, without attachment to political or party ideologies, aiming exclusively at the defense of legitimate interests of the Company.

**6.1.7.** Administrators and Collaborators who have an emotional or family relationship with Public Agents who have decision-making power in government bodies and entities within the scope of Company operations, must report the situation as described in internal regulations of the BMV Global Group.

**6.1.8.** In providing technical opinions, clarifications, suggestions and information to Public Agents, all content must be complete, updated, accurate and reflect reality.

**6.1.9.** Rules and procedures must be observed in relation to the offering and receiving gifts and amenities.

**6.1.10.** In face-to-face meetings with Public Agents, which must be scheduled in a whenever possible, and in an institutional manner, BMV Global Group must be represented by no minimum 2 (two) employees or administrators, 1 (one) of whom may be replaced by representative of associations to which the Company belongs, unions, federations or confederations of industries. Exceptionally, BMV Global Group may be represented by 1 (one) employee or administrator, including in situations where the interaction occurs unscheduled, or where there is a lack of time to schedule a meeting, or urgency. Possible situations that may result in conflicts with the guidelines of this Policy must be reported to the Compliance and Corporate Risks.

**6.1.11.** Communications and reports on interactions with Public Agents must be kept available for possible audits, in a way that makes it possible to identify the issues covered, contacts and proposals for actions and/or monitoring of the topics discussed.

**6.1.12.** The promotion and financing of philanthropic, educational, artistic, health, cultural, social and environmental.

## **7. SENIOR MANAGEMENT COMMITMENT, COMMUNICATION AND TRAINING**

**7.1.** The BMV Global Group will carry out training for management and employees with the aim of educate and raise awareness about Corruption prevention practices.

## **8. RESPONSIBILITIES**

### **8.1 Board of Directors**

- approve the guidelines of this Policy.

### **8.2 People and Ethics Committee**

- evaluate and decide on specific topics in the areas of the BMV Global Group that involve conflicts related to ethics in BMV Global Group operations and in the work environment;
- approve improvements in processes as a result of regulations, identified risks, complaints, between others;
- monitor compliance with policies and procedures related to preventing Corruption and possible deviations; and
- evaluate the complaints received and decide the penalty.

### **8.3 Sustainability and Risks Committee**

- evaluate and decide on issues involving anti-corruption practices in BMV Global Group operations;
- discuss regulatory and legislative interpretations related to Corruption prevention; and
- indicate improvements in internal processes of the BMV Global Group in order to adopt best practices compliance.

### **8.4 Administrators and Collaborators**

- know and follow the guidelines of this Policy and disseminate its content and other standards related to it related matters, in particular the BMV Global Group Code of Conduct, to which they adhere at the time of their admission;
- participate in Corruption prevention training provided by the BMV Global Group; and
- monitor and inform the Executive Board of any violation and suspected violation of this Policy and the BMV Global Group Code of Conduct, as well as collaborating with internal investigations in Corruption reporting cases.

### **8.5 Legal, Compliance and Corporate Risk Department**

- interpret legislation related to this Policy to support other areas of the BMV Global Group, as well as clarifying legal doubts relating to the subject;
- develop, establish and review, when necessary, standard Corruption prevention clauses to be included in contracts;
- assist in the preparation and review of Corruption prevention training and anti-corruption campaigns awareness; and
- assist in the review and discussion of proposals related to the topic of this Policy discussed in the entities of representation.

### **9. QUESTIONS AND REPORTS CHANNEL**

The BMV Global Group has a specific channel that can receive communications of violations of this policy, complaints, doubts about interpretation, complaints, suggestions or reports of attempts to Corruption. The BMV Global Group guarantees protesters full protection against reprisals and that investigations will be carried out in a timely manner and conducted with professionalism, impartiality, confidentiality and confidentiality. Anonymous manifestations will also be received. The fact must be communicated by through the channels below:

- Email: [Ouvidoria@bmv.global](mailto:Ouvidoria@bmv.global)

In order to optimize the measures taken by the BMV Global Group, communication must, whenever possible, be accompanied by as much information as possible. Among them, the following stand out: correct description of the fact; where and when it happened or is happening; who are the people and organizations involved; and evidence that assists in evaluating the case and forwarding actions.

### **10. PENALTIES**

Failure to comply with any guidelines or principles established in this Policy is subject to disciplinary sanctions, including dismissal, without prejudice to administrative, civil, criminal or other appropriate measures. The application of measures to remove administrators in cases of involvement in acts of corruption and fraud is provided for in internal regulations, and vacancy rules must be observed provided for in the Bylaws. Deliberation on the application of removal is the responsibility of the Board of Directors. Administration, with the member involved abstaining, if applicable.

## **11. RELATED DOCUMENTS**

This Policy must be read and interpreted in conjunction with the following documents:

- BMV Global Code of Conduct and Ethics
- Risk Management Policy
- Anti-Corruption Law – Federal Law No. 12,846/13, as regulated by Federal Decree No. 8,420/2015
- Administrative Improbability Law – Law No. 8,429/1992
- Bidding Law – Law No. 8,666/1993 • US Foreign Corrupt Practices Act (FCPA)
- BMV Global Group Integrity Program