



I, the undersigned, sworn English translator and interpreter, registration N° 0390511/2011, hereby attest that I received the original document *Política Anticorrupção* written in Portuguese, to be translated to English, which I did as part of my craft, as follows:



01/07/2016

SERVTEC Group

ANTI-CORRUPTION POLICY

1. GOAL

To establish standards of professional conduct for its employees, representatives, attorneys, and service providers that mitigate any acts of corruption, bribery, or money laundering, always observing the provisions of Brazilian anti-corruption legislation.

2. SCOPE

2.1 This Policy applies to all "Representatives" of the SERVTEC Group (SERVTEC), regardless of their hierarchical level or nature of the bond covering their counselors, executives (directors, superintendents, managers, and administrators) and other collaborators.

2.2 This Policy and the principles contained therein should be adopted by all companies controlled by SERVTEC and by all its "Representatives" acting in representative or managerial positions or functions in undertakings in which it holds a shareholding, or which represents it in any institution in which it is affiliated, such as associations and foundations.

3. ANTI-CORRUPTION POLICY


Emmanuel Cavalcante Porto
Tradutor Público Inglês
Mat. 0390511

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3.1 SERVTEC does not tolerate any form of corruption, bribery, or unlawful payments, both in the public and private spheres.

3.2 The Policy requires compliance with the Code of Ethics of SERVTEC ("Code of Ethics") and all applicable Brazilian laws and regulations against bribery, corruption, and money laundering.

3.3 SERVTEC adheres to the United Nations Global Covenant against Corruption, and to Laws n° 12,846/2013, n° 8,429/92, n° 8,666/93 and n° 9,613/98 (together, the "Anti-corruption Laws").

3.4 This Policy prohibits SERVTEC Representatives from engaging in acts of corruption, whether active or passive, direct or indirect. It forbids its "Representatives" from offering, promising, providing, or authorizing any person to provide money or any item of value to public agents, or persons related to them, or to any natural person or legal person for the purpose of obtaining or accumulating any undue advantage.

4. PROFESSIONAL CONDUCT

4.1 No service provider shall be punished for refusing to pay or receive kickbacks, or for refusing to perform any act that is characterized as corruption.

4.2 It is forbidden to make false statements to the Government on behalf of SERVTEC and the Representative must keep records and documentation that show the veracity and transparency of communications and negotiations with the Public Authority.

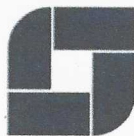
5. FORBIDDEN PRACTICES

Representatives of SERVTEC are expressly forbidden to perform the following practices:

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5.1 Extortion or abuse of function: it is forbidden to abuse your position within SERVTEC to gain any kind of advantage, for you or for any related person, directly or indirectly. It is also forbidden to require or solicit undue advantage, including in cash, in exchange for carrying out routine administrative tasks, such as obtaining information, payments, approving projects, or omission of a craft obligation, such as supervision and enforcement of penalties for breach of contract.

5.2 Corruption: (i) To promise, offer or pay to a public agent, to a professional of the private sector, or to persons related to them, by you, or through an intermediary, whether natural or legal person, money or any other favor or undue advantage (for example, travel, accommodation, tickets and gifts) so that the public or professional employee of the private sector ceases to behave ethically with his legal, professional and contractual duties; (ii) to make any payment, known as facilitation payment, by you or through third parties, through which an action, a governmental service or act may be unduly expedited or aimed at ensuring the performance of an action or service in relation to its normal conditions of performance or compliance, in particular if the act or omission may constitute undue favoritism; (iii) to finance, fund, sponsor or in any way subsidize, by you, or through third parties, the commission of the unlawful acts provided for in this Policy or in the Brazilian anti-corruption legislation; (iv) to use an interposed natural or legal person to conceal or disguise his or her real interests or the identity of the persons entitled to the acts committed; (v) to manipulate or defraud, directly or through third parties, the process of selecting and hiring suppliers and service providers; (vi) to manipulate or defraud, directly or through third parties, contracts signed by SERVTEC, either with the public administration or between private parties; (vii) to accept and/or comply with the requirement or imposition of a public agent for unlawful payment or any undue advantage for the benefit of the public agent or a person related to him.

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5.3 Money laundering: concealing or hiding, by you or by or through third parties, the nature, origin, location, disposition, movement or ownership of property, rights or assets arising directly or indirectly from a criminal offence.

5.4 fraud: (i) to engage in any deceptive, tricky, malicious act with the intention of harming or deceiving others, or failing to perform a particular duty, and obtaining undue advantages or benefits for himself or others (whether pecuniary or not); (ii) To take advantage of the position or abuse the trust deposited in himself to obtain undue advantage, falsification or adulteration of documents or information, practice of nepotism or misappropriation of company property.

5.5 Influence peddling: To grant, by you or through third parties, advantage or promise of advantage, even if not financial, to a public employee or professional of the private sector with the purpose of influencing an act practiced by these persons in performing their duties.

6. PROCUREMENT OF SUPPLIERS OF GOODS AND SERVICES

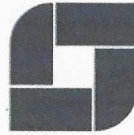
6.1 When contracting suppliers of goods and services, SERVTEC Representatives must ensure that suppliers and service providers have the necessary qualifications and a solid reputation for business integrity.

6.2 The relationships with suppliers considered to be at high risk of corruption and who are involved in strategic contracts, or who have some history related to illicit practices, should be reported to SERVTEC shareholders for proper monitoring.

6.3 SERVTEC representatives shall ensure that payments to suppliers are adequate and correspond to the services legitimately provided, as defined in the respective contracts.

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6.4 If a Representative of SERVTEC knows or has legitimate reason to believe that a payment has been negotiated or made by another Representative of SERVTEC in breach of this Policy, Anti-corruption Legislation or Code of Ethics of SERVTEC, he shall immediately report this fact to the SERVTEC Shareholders.

7. PENALTIES

Violations of the Anti-corruption Law may result in serious penalties for SERVTEC and its Representatives involved, directly or indirectly with Corruption practices. Therefore, the practice of corruption, fraud, bribery, or money laundering by a Professional or company representative is punishable and will result in penalties that may include termination of the employment or service contract / supply, plus civil, administrative, and criminal sanctions, as provided by law.

8. GENERAL PROVISIONS

This Policy shall be disclosed and is of mandatory knowledge by all Representatives of SERVTEC.

< signed >

Pedro Cunha Fiuza
President

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This translation does not imply any judgment on the form, authenticity and/or contents of the said document(s). I certify that I am competent to translate this document and that this translation is true and accurate to the best of my abilities.

March 07, 2022