

## ETHICS AND COMPLIANCE MANUAL

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**Intertechne**

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**ETHICS AND COMPLIANCE MANUAL**

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## ETHICS AND COMPLIANCE MANUAL

### 1. PURPOSE

To present the principles and rules of conduct adhered by INTERTECHNE to prevent corruption in the countries it operates. To share the values and principles, and to instruct employees and Third Parties on the main guidelines concerning relationships, to meet the corporate governance, ethics, and transparency practices requirements.

### 2. APPLICABILITY

This Manual applies to all company's employees, the Executive Office, the Board of Directors, and any service provider (Third Party) acting on behalf of INTERTECHNE.

Service providers must be informed of the content and scope of this Manual and shall undertake to fulfill all applicable anti-corruption laws in force. It is prohibited to contract Third-Parties not previously accepting this condition.

In case of doubts on the compliance with a certain procedure and/or attitude concerning the policies set forth by this manual, the employee must seek the guidance of their immediate manager, as a more detailed and thorough analysis (even a legal analysis) may be required.

### 3. REFERENCES

Law No. 10406/2002	Brazilian Civil Code
Federal Law No. 12.846/2013	Anti-corruption Act, of August 01, 2013
Law No. 8.429/1992	Administrative Corruption Act
UN Global Compact	Global Compact Ten Principles
7001-SI-8-IC-G00-GE-G-00-MD-0001	Anti-corruption Clause Template
7001-SI-8-IC-G00-GE-G-00-MD-0002	Due Diligence Questionnaire for Third Parties Template
7001-SI-8-IC-G00-GE-G-00-MD-0004	Acknowledgment of Receipt and Commitment Template - Internal

Brazil is a signatory and ratified three international conventions against corruption:

- United Nations Convention against Corruption (UNCAC) – United Nations.
- OAS Inter-American Convention against Corruption - Organization of American States.
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions - Organization for Economic Co-operation and Development

#### 4. ACRONYMS AND DEFINITIONS

Employee: Any member at INTERTECHNE, except officers and directors.

Compliance: The term originates from the verb "to comply". It means: "being in compliance with" or "being in a position of observance and fulfillment of rules, laws, and standards".

UNCAC: United Nations Convention against Corruption.

Ethics: Philosophical study of the moral values and ideal principles of human conduct. The set of moral principles to comply while performing an occupation.

Corporate Governance: The set of processes, customs, policies, laws, and regulations on how a company is managed, administered, or controlled.

OECD: Organization for Economic Co-operation and Development. OAS: Organization of the American States.

ILO: International Labor Organization

UN: United Nations.

Third parties: Suppliers, consultants, advisors, intermediaries, and/or other service providers.

PCBD: Planning, Control, and Budget Department.

**HRPD: HUMAN RESOURCES DEPARTMENT.**

#### 5. GENERAL CONDITIONS

INTERTECHNE fosters its reputation and credibility, and the ethical principles guiding its activity contribute to its image as a sound and reliable entity before its customers, Third Parties, shareholders, employees, and the society in general.

INTERTECHNE understands that it must share its values and principles, and instruct its employees, officers, directors, and Third Parties on the main guidelines guiding its relationships, to meet the good corporate governance, ethics, and transparency practices requirements.

This content does not provide any absolute explanation of any laws, regulations, policies, and procedures. Complex situations may hamper the outline of sufficiently comprehensive rules for all circumstances. However, this manual helps discuss on how to proceed when there are no specific guidelines and to weigh on questions that may guide and determine the most proper decision: "What is the correct decision?", "Is it in compliance with the company's policies and relevant laws?", and "How would it be interpreted by the public, social communication, and government?".

##### 5.1 VALUES AND PRINCIPLES

The introduction of strict laws on corruption practices and a more intolerant attitude of the society towards ethical deviations by the companies lead to formal mechanisms to prevent any practices considered harmful.

Compliance with the Ethics and Compliance Manual aims to protect the company, its

employees and managers against the commitment of any offense and collaboration with offenders, thereby minimizing the risks of criminal liability and problems with the public opinion.

The company's Integrated Policy establishes the following:

*"INTERTECHNE, a Brazilian company with international operations, specialized in consulting and engineering services, in its mission and purposes, associated with the significance of the compatibility of social and economic development with the proper operations improvement, environment conservation, health care promotion, and control of occupational risks, has established an integrated policy, whose general provisions are described below:*

- *To efficiently serve its customers;*
- *To promote continuous improvement of its processes;*
- *To provide resources for the use of up-to-date technologies;*
- *To meet the applicable laws and further requirements applicable to its activities;*
- *To minimize the environmental impacts arising from the activities developed around its facilities, particularly as for waste generation for controlling and preventing pollution; and*
- *To promote proper health and safety conditions for its employees, third parties and visitors, particularly as for the exposure to biological agents and ergonomics, by preventing and minimizing risks at the working environment.*

To detail its commitments toward honesty and integrity of its administrative and business practices, INTERTECHNE has prepared this manual of conduct to prevent all forms of corruption in the countries it operates.

The values and principles of this anti-corruption policy are outlined through the following premises:

- The company must define clear rules according to its social responsibility and relationship with customers and Third Parties.
- To comply with the law, either domestic or from the country of operation.
- To correctly relate to customers and Third Parties, prohibiting passive and/or active corruption by receiving and offering any advantages of any nature other than those concerning the strict compliance with their contractual obligations.
- The company's actions and decisions must be fair and comprise the good corporate governance practices.
- No employee shall be punished or penalized for delay or loss of any business as a result of their refusal to pay or receive bribery. Complying with instructions from customers, Third Parties or employees, officers, and directors, conflicting or ignoring the conditions established in this Ethics and Compliance Manual or the applicable/effective laws, is prohibited.
- Improper, ambiguous, or fraudulent accounting entries and any other procedure that

may conceal or otherwise cover up illegal payments are not accepted or permitted.

- Each of the company's employees, officers, and directors shall act with dignity, ethics, and compliance with the law while performing their professional activities, as well as in their daily lives as citizens.
- The company, its employees, officers, and directors must promote the well-being by acting with no prejudice and discrimination of any nature, whether such nature is: politics, economy, social, religion, race, nationality, gender, age, marital status, sexual orientation, etc.

The principles herein are a common overview on behaviors and attitudes guiding on: how to interact with peers, how to do business with associates and Third Parties, and how to serve customers, the community, and environments where INTERTECHNE operates worldwide. Such principles must be part of all business decisions, since they reflect whom the entity is and design its reputation, granting it with respect, credibility, and prestige.

## 6. RULES AND CONDUCTS

The Brazilian Penal Code defines corruption in two forms:

- **Active corruption:** "to offer or promote undue advantage to any civil servants to make them practice, conceal, or postpone any ex-officio action".
- **Passive corruption:** "practiced by the civil servants requesting or receiving any undue advantage, for themselves or other people, either directly or indirectly, even if out of their role or before being vested on them, but in virtue thereof. Also, by whom accepts any promise for such an advantage".

Corruption acts include bribery (concession; active and passive corruption; crimes against tax and economic order and commercial relationships; administrative corruption crimes); transnational corruption, and grease payments.

Acts against the company's integrity include payment of gifts and travels not in compliance with the legal terms; off-book accounting; tax evasion; money laundering; indirect corruption through support and sponsorship policies.

Based on those definitions, the employee, officer, or director must be aware of the following operating procedures established by INTERTECHNE's Ethics and Compliance Manual to prevent breaches to the policies described herein and anti-corruption and anti-bribery laws and regulations from resulting into severe civil and/or criminal penalties to the companies and the stakeholders:

- **Payment value:** "Any valuable asset" includes a broad range of items. Common examples include money, gifts, meals, entertainment, shares, personal property, debt waiver, charitable donations, and services. Even if the "value" is low, there is always the potential to breach the laws in force and principles of this Manual.
- **The efficiency of any offer:** According to the laws from many countries, a breach is committed even in case of refusal of the payment or bribery offering, i.e., the simple fact of being offered constitutes a breach and both the company and the agent may be punished for such reason. Any simple offering constitutes a breach.

- **Government Officials/Private Company Employees:** Bribery and corruption between the company and its business partners or government officials are prohibited. It is important to record that, in some cases, there are private companies with a shareholding of publicly-traded companies; therefore, the prohibition on bribery and corruption aims to cover any case.
- **Use of agents and other intermediaries:** It is important observing that the prohibition on bribery and undue payments also applies to subcontractors and intermediaries. Agreements with Third Parties should provide for the prohibition to bribery and corruption, and that agents or intermediaries are fully aware of and agree on the company's practices outlined in this Manual as for anti-corruption practices. Acts by Third Parties may hold INTERTECHNE indirectly liable for corruption activities; therefore, such procedures must be restrained.
- **Anti-Bribery:** In some jurisdictions, INTERTECHNE may be criminally convicted for failing to avoid bribery made on its behalf by any employee, officer, director, or sales agent. As for agents, they may be held liable even if nobody at the company is aware of the bribery. As prevention, the agent must enter into an agreement with INTERTECHNE containing the anti-corruption clause, and the documents must be filed. In case of breach of this manual, INTERTECHNE may take the proper actions for penalization and, when required, termination of the agreement.
- **Gifts, meals, travels, hospitality, and entertainment:** Business lunches or small gifts, travels, hospitality, and entertainment are usual practice in the business world. However, such procedures are prohibited whenever they are performed to improperly influence any official act or decision. The values associated with meals, travels, and lodging must be limited to those usually adopted by the company's regular standards, and in proportion to the event. The duration of the travel must be restricted to the time required to meet the business purpose and its cost must cover only the amounts directly related thereto. Any private activities during the travel shall be at the person's expenses; no payments for any customer or employee without business justification are permitted.

Gifts to private company representatives or individuals related thereto are acceptable in case they are modest and help build and strengthen the business relationships. Gifts to civil servants or private employees related to business negotiations must have their value limited to 20% of the minimum wage in force in Brazil and, preferably, they must have the company's name or logotype. Gifts in cash are not permitted. The Executive Office is solely responsible for authorizing gifts in any amount higher than that set forth herein. Excessive or disproportional gifts or representation expenses to influence the beneficiary to take any position in favor of the company are considered as bribery.

Expenditures with such items must be detailed in the respective accounts of the person in charge, to provide full transparency for the costs incurred and the respective stakeholders.

- **Charitable contributions:** Charitable contributions made upon direct request,

suggestion, or recommendation by any government official or business partner are prohibited. Donations may be considered as indirect bribery performed to obtain or maintain agreements, business, government approvals, favorable decisions concerning customs tax or fees, or to assure any other improper business advantage. Contributions for legitimate philanthropic reasons are authorized. They must be transparent and, whenever possible, tax-deductible.

The request for contribution must be made in writing, specifying the organization requesting the contribution, the purpose of contribution, and the requested amount. The request must be carefully verified to avoid personal benefit. Contributions must be previously approved by the Executive Office. Under any circumstances, payments shall be made in cash or by deposit into any personal current account.

- **Political contributions:** Contributions to political parties or candidates with the company's capital or on its behalf are prohibited. As defined in the terms of the laws in force, INTERTECHNE's employees, officers, or directors have free right to exercise any individual political manifestation, including the contribution of personal capital to political parties or candidates. However, it is prohibited to use any facility, medium or capital, and the name of INTERTECHNE for such activity.

## 7. CONFLICT OF INTEREST

The conflict of interests may arise whenever a director, officer, or employee takes actions or has personal interests that may interfere in the performance of their role at INTERTECHNE.

Employees, Directors, and Officers must avoid actual or implied conflicts between their interests and the company's interests involving them or their close relatives. All of them are prohibited to take any action resulting in personal benefit, as well as the benefit of relatives or friends. Business decisions must be governed by good judgment and objectivity, and never by their convenience. People must:

- Avoid any actual or apparent conflict of interests with customers, competitors, associates, and Third Parties.
- Refrain from any opportunities for themselves through corporate assets or their role at the company.
- Avoid the transfer of data and information to Third Parties concerning non-public materials or information obtained through their role in the company.
- Refrain themselves from competing with the company.

Whenever there is any potential for such conflicts, the direct manager must be informed, who shall assess the need to inquire the Ethics and Compliance Committee or Executive Office on such possibility, and shall receive guidance on the procedure to be followed.

It is prohibited to use the company's capital to meet private interests or to engage in any activity in the conflicting interest with the company's business or their working hours. The employee, officer, or director may not become a member, manager, advisor, consultant, attorney-in-fact, or intermediary in any entity having a business or being a competitor of INTERTECHNE in any of their activities. All of them may have roles as a member,

manager, or officer at other companies, provided that they do not represent any conflict of interests or interfere with their duties with INTERTECHNE, so they must inform such activity to their manager.

Some other examples of possible conflicts of interests are memberships, employment, and activities of close relatives; investments made by employees, officers, directors; and their close relatives.

## **8. OBLIGATION OF AGREEMENTS WITH THIRD PARTIES**

INTERTECHNE's Ethics and Compliance Manual must be disclosed to its suppliers, consultants, advisors, intermediaries, and/or other service providers (Third Parties).

The purchase of assets and services by INTERTECHNE must be solely performed based on quality, safety, price, and the value they add. Third Parties are expected to undertake to share INTERTECHNE's commitment to integrity and fair negotiation.

Third Parties must, while performing their roles, observe honest, worthy conduct with strict compliance with the applicable laws, respect to human rights, the environment, and the company's ethical standards.

In their business actions, Third Parties must comply with all applicable laws and regulation in the country or region where they operate, in compliance with the highest honesty and integrity standards, to avoid the incidence of situations deemed to be suspicious.

Third Parties must also foster for the selection of business partners in compliance with the laws in force concerning their activities, particularly, the Law No. 12.846/2013 ("Anti-Corruption Act").

Third Parties must also verify partner's trade practices before making business with them, to identify any conduct deviations concerning the principles and values in this Ethics and Compliance Manual.

Third Parties are responsible for losses from practices and acts from their trade partners that may be or are attributed to INTERTECHNE.

The access to information provided by INTERTECHNE to Third Parties must be limited to people required to receive the information, and its use must be limited to the specific purpose of supplying or providing the service. All subjects regarding INTERTECHNE must be dealt with by third parties with secrecy, confidentiality, and protection to intellectual property rights.

The company fosters for meritocracy and fair competition in the markets. The same behavior is expected from Third Parties.

Third Parties are prohibited to promote, offer, or give, either directly or indirectly, any undue advantage to any civil servant, private employee, or employee from the non-profit sector, or to any third party related thereto, to influence any act or decision of promoting their own or INTERTECHNE's interests.

Agreements with Third Parties have clauses obliging them to observe the INTERTECHNE's Ethics and Compliance Manual, in compliance with the applicable and effective anti-corruption laws.

INTERTECHNE respects and supports human rights in its activities and business and employment relationships and only admits the establishment of business with Third Parties that also respect and comply with the principles and values below:

- Third Parties must properly collect all fees and taxes concerning the exercise of their business activity.
- INTERTECHNE's third parties shall not tolerate, allow, or agree on the employment of forced and/child labor, sexual exploitation of children and adolescents, and human trafficking in any process related to their activities, as per the rights of the child and adolescent and the ILO - International Labor Organization resolutions observed.
- INTERTECHNE's third parties must provide their employees with suitable labor conditions concerning the working hours, health, and safety, and comply with the labor laws of the location where they operate. They must compensate their members in a fair, worthy manner, as for objective assessment criteria and legally determined benefits.
- INTERTECHNE requires their third parties to strictly comply with the labor law of the locations where they operate, and the collective bargaining agreements and collective labor agreements in force, without implying the establishment with any relationship with INTERTECHNE.

INTERTECHNE's Financial and Administrative Office shall issue the Amendment to the Agreements in force for including any anti-corruption clause, as per the templates provided for in documents 7001-SI-8-IC-G00-GE-G-00-MD-0001 Anti-Corruption Clause Template and 7001-SI-8-IC-G00-GE-G-00-MD-0002 Due Diligence Questionnaire for Third Parties Template.

## **9. CONFIDENTIALITY AND USE OF INFORMATION SYSTEM**

Confidential, strict, and proprietary information shall encompass any information provided to employees and Third-Parties arising from of the performance of their roles and activities, including, but not limited to, any verbal and/or written information transmitted and/or disclosed by the company.

The intellectual property of the company or its customers and Third-Parties must be respected and preserved.

Because of its activities and relationships with customers and partners, INTERTECHNE develops and has access to confidential information, including i) written, graphic, visual documents or virtual information contained in software or kept in electronic storage files; (ii) prototypes, samples, layouts, or equipment and information related to patents, applications for patents, researches, business plans and/or products, know-how, technical or business proposals, products, developments, inventions, processes, drawings, formulas, engineering studies and markets, regulatory information, data and analyses, reagents, biological materials, chemical formulas, agreements with Third Parties, services, consumers, marketing, or finance. Confidential information must be kept confidential by any individual having access to such information, either as a result of professional activity

or personal relationship. Whoever has access to any confidential information must not disclose it to anyone, not even to other company members, market professionals, friends, and relatives; neither must use it in their own or third-party benefit.

To ensure integrity, confidentiality, and availability of information, individuals concerned must be aware that:

- The professional secrecy comprises information on the business, including business promotion plans, agreements, list of customers, database, patents, and intellectual property, systems, programming, computers, costs, strategies, and subjects on business competitiveness. Failure to comply with confidentiality shall imply civil and criminal liability. Intellectual property means any important documents or files recorded in the corporate network, servers, or computers at INTERTECHNE.
- All documents produced within the scope of development or obtained as a result of the company are the property of the company and may not be reproduced, copied, or presented to Third-Parties without prior and express consent.
- Every employee, officer, and director is responsible for protecting the resources provided to them and must promptly report any threat or event that may result in damages to the company.
- Even after the expiration and/or termination of the employment relationship for any reason, employees must comply with the rules in force and shall be subject to the assessment of their responsibility at the legal sphere.
- Employees may not use or provide a company's information which is not already public without prior the consent of the Executive Office. The confidentiality of the data must be preserved, and the awareness of the internal situation or company's data may not be misused.

The company provides an e-mail address and the Internet to any employees, officers, and directors for exclusively corporate purposes. The use thereof must concern professional activities and the company's purposes; however, personal use is moderately permitted. The use for political manifestations of discriminatory nature or with improper and unlawful content is prohibited.

INTERTECHNE may monitor the use of the Internet, including the time of usage and the websites visited. Such follow-up shall only serve to ensure compliance with the INTERTECHNE's IT Policy, and particularly, to prevent the usage of such media for unauthorized or illegal purposes.

INTERTECHNE may verify the content of emails submitted from corporate electronic addresses (@intertechne.com.br). This verification must ensure compliance with the company's security policy.

The employee, officer or director must not send or access any mail related to the professional activity in open e-mail systems (Hotmail, Gmail, among others), neither must they use open file-sharing systems (Dropbox, WeTransfer, among others), due to the information security risk. The use of such resources is allowed upon prior consent of the Executive Office only.

It is prohibited to use open e-mail systems (Hotmail, Gmail, among others) or open file-sharing systems (Dropbox, WeTransfer, among others) to send/receive any personal material through the INTERTECHNE network.

It is prohibited, under any circumstance, to install and use "bootleg" software or software not complying with the intellectual property rights, infringing the good customs, or promoting discrimination of any type.

Browsing at the Internet must be made by meeting the company's needs, where its usage is moderately allowed for personal purposes. It is prohibited to visit websites with improper content for the work environment, which characterizes any breach to the laws, or which causes embarrassment of any nature to other employees. Internet browsing may be monitored by the company.

The storage of personal files at the company's computers and servers having any improper content and/or being able to infringe the company's integrity is not permitted. The employee, officer, or director shall be held liable for the content filed and the improper storage at the network.

It is prohibited to make copies and backups by any means or method of any document received in virtue of the employment relationship.

Passwords to access the company's network and systems are personal and must be confidential. Employees are fully responsible for any action concerning their user login.

Speaking on behalf of INTERTECHNE in social networks is prohibited unless if expressly authorized.

Employees are prohibited to install and update any software. Installations and updates must be made by the company's IT department only.

## **10. ETHICS AND COMPLIANCE COMMITTEE**

The main purposes of INTERTECHNE's Ethics and Compliance Committee are: to ensure continuous updating and compliance with the policies and procedures related to this document; and to develop/recommend/review the applicable guidelines, as well as to analyze any allegation that an employee, officer, director or Third Party may have breached the company's standards of conduct, and to report its conclusions to the CEO.

The Ethics and Compliance Committee shall comprise a representative from each of the following areas, chosen by the Executive Office:

- Business Development Office
- Financial and Administrative Office
- Presidency
- Water and Energy Office

Financial and Administrative Office shall provide training to employees, officers, and directors for awareness and perfect understanding of the contents and provisions in the

Ethics and Compliance Manual.

Ethics and Compliance Committee shall verify the correct description of complaints received; the specific conditions of the incidence, the people and companies involved, and the evidence assisting the assessment of the subject and the forwarding of actions. The record must be forwarded to the CEO for analysis and resolution at the first Executive Office's meeting after the record thereof.

The Ethics and Compliance Committee must prepare a biannual report of its activities containing the occurrences and complaints verified over the period and the arrangements taken and suggest enhancements in the guidelines and practices for prevention and combat against corruption within the scope of the company and its business. The biannual report must be forwarded to the Executive Office and the Board of Directors.

## 11. PENALTIES

Failure to comply with any guidelines or principles in this Manual shall not be tolerated and be subject to disciplinary sanctions and the enforcement of effective laws. The practice of fraud and bribery by any employee, officer, or director is subject to punishment and shall result in sanctions that may include the termination of the employment agreement and civil or criminal liability.

No employee has the authority to make exceptions or grant an exemption to the company's policies. In the event of doubt, directors, officers, and employees are expected to seek clarification and guidance. After review, the approval by the company of any activity or situation shall not mean to grant any exception or waiver, but to determine that there is no breach to the policy. The company must make arrangements in case of a breach to the policy.

## 12. DISCLOSURE AND COMPLAINTS

Employees, officers, and directors must read the INTERTECHNE's Ethics and Compliance Manual and confirm in writing, through the Acknowledgment of Receipt and Commitment, 7001-SI-8-IC-G00-GE-G-00-MD-0004 Acknowledgment of Receipt and Commitment Template - Internal, the reading and full understanding of its content, as well as the commitment to comply with its provisions when dealing with the company's business.

The disclosure of this Manual shall be made available through the Portal do Conhecimento at the company's Intranet and website. Employees, officers, and directors shall be notified of any review via e-mail.

INTERTECHNE reinforces its commitment towards ethics and high standards of business conduct. All employees, officers, and directors are expected to inform their suspicions on breach of laws and the company's policies. Individuals at INTERTECHNE are responsible for reporting the breaches to this Manual directly to their manager, Executive Office, or anonymously, to the Ethics and Compliance Committee via email: [etica@intertechne.com.br](mailto:etica@intertechne.com.br), at the company's head office address, in Curitiba, or through the Communication Channel at the Intranet - *Fale com o CEC* (Ethics and Compliance Committee). Confidentiality is ensured throughout the entire investigation process.

Potential situations of fraud, abuse, or breaches to the law and the company's policies and

internal controls, as well as requests for guidance on the conduct made by the employees, must be reported.

Employees, officers, directors, and Third Parties may file complaints and inquiries anonymously and/or directly. All complaints must be properly analyzed and treated by the Ethics and Compliance Committee. The company encourages the employees, officers, and directors to ask questions, state their concerns, and make proper suggestions to INTERTECHNE's business practices.

Answers to questions, doubts, complaints, and suggestions from employees, officers, or directors must be discrete, anonymous, and confidential. However, the preservation of anonymity and confidentiality either may or may not be 100% enforceable, depending on the circumstances. E.g.; investigations on significant complaints may disclose the complaint/defendant and the plaintiff to the Executive Office. The confidentiality of complaints shall be respected. It is prohibited and any type of retaliation to the plaintiffs. Any employee, officer, or director engaged in any retaliation shall be subject to disciplinary sanctions by the company, including, but not limited to, the termination of the agreement. No action or threat shall be made against any employee, officer, or director for any question asked, concern stated, or complaint or suggestion made, in compliance with the procedures described herein, unless the employee, officer or director acts with willful misconduct on the truthfulness of the facts.

INTERTECHNE expects honesty from its directors, officers, and employees. Failure to comply with the provisions herein may result in corruption and demoralization of the organization. INTERTECHNE's management system shall honor honesty, encompassing the transparency of its accounting, serious and fair proposals for the budget with full economic project evaluations.

For a work environment with mutual respect among directors, officers and, employees and harassment-free employment relationships, INTERTECHNE prohibits any type of harassment BY or TOWARDS directors, officers, employees, Third Parties, or customers. According to the company's principles, harassment is any improper conduct which purpose or effect is to:

- Create an intimidating, hostile, or offensive work environment.
- Interfere in the professional performance of any individual without justification.
- Influence the job opportunity of any individual.

Intimidation will not be tolerated. Forms of harassment include, but not limited to:

- Verbal or physical assaults.
- Derogatory or discriminatory acts, contents, statements and comments, either by race, color, gender, ethnics, social class, age, physical feature, nationality, religion, deficiency, marital status, sexual orientation, union participation, political party affiliation, or political conviction.

All employees, officers, and directors will be subject to disciplinary actions, including dismissal, due to any harassment act. The individual believing to be a victim, observing or becoming aware of any event of harassment must promptly report the incident to the area

manager or the Ethics and Compliance Committee. All complaints will be promptly and thoroughly investigated. No employee, officer or director must assume that the company is aware of any problem.

No retaliation shall be made against any employee, officer, or director for communicating any problem referring to possible acts of intimidation. Employees, officers, and directors may raise their concerns and reports without any fear of retaliation, being at all times governed by good judgment.

The external public must send an email to the company's website, which shall be forwarded to the four representatives of the Ethics and Compliance Committee. The email is [etica@intertechne.com.br](mailto:etica@intertechne.com.br).

**13. RECORD CONTROL**

Identification	Storage		Protection	Retrieval	Holding time	Disposal
	Local	Responsible Person				
Anti-corruption clause	Network and physical folder	DPCO	Back-up file	Per agreement	Permanent	Server back-up
Due Diligence Questionnaire for Third Parties	Network and physical folder	DPCO	Back-up file	Per agreement	Permanent	Server back-up
Acknowledgment of Receipt and Commitment - Internal	Physical folder	DPRH	File	Per employee	20 years	Dead Files