

ETHICS AND COMPLIANCE MANUAL

4	Review of items 6, 9 and 10.	MCO/ AT/ CDGS	FACA/ PA	MAR/23
3	Update of the Integrated Policy according to the critical analysis meeting 7001-SI-AC-0001_19	MCO	FACA/ LNJB	MAY/19
2	It updates the departments responsible for the activities and the periodicity of the reports.	FACA	LNJB	FEB/19
1	It cancels the 7001-SI-8-IC-G00-GE-G-00-MD-0003 Receipt and Commitment Term Template – Third Parties. The Receipt and Commitment Term Template was canceled and its content inserted in the Anti-Corruption Clause Template 7001-SI-8-IC-G00-GE-G-00-MD-0001.	ADSG	AFK	AUG/16
0	Initial issue.	ADSG	AFK	JUN/16
No.	Description	Prep.	Approv.	Date
REVISIONS				

Developer	CBS/ADSG/AT/ FACA	Approved
Checker	PA	EXEC BOAR Executive Board
Supervisor	Management Committee	
Date	JUN/16	Lourenço J. N. Babá Chief Executive Officer

Intertechne

Document No.	Review
7001-SI-8-IC-G00-GE-G-00-MN-0001	4

ETHICS AND COMPLIANCE MANUAL

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ETHICS AND COMPLIANCE MANUAL

1. PURPOSE

Present the principles and rules of conduct adopted by INTERTECHNE to prevent and combat all forms of corruption in the countries where it operates. Share values, principles and instruct employees and third parties on the main guidelines that guide their relationships, in order to meet the requirements of corporate governance practices, ethics and transparency.

2. APPLICATION FIELD

The content of this Manual applies to all company employees, including the Executive Board and Management Board, to any service provider (third party) acting on behalf of INTERTECHNE.

All service providers must be informed about the content and scope of this Manual and must undertake to comply with all applicable anti-corruption legislation in force, being forbidden to hire third parties who do not previously accept this condition.

In case the employee has questions as to the compliance of a certain procedure and/or attitude towards the policies established in this manual, it is his responsibility to seek guidance from his immediate manager, since a more detailed and in-depth analysis (even legal) may be necessary to guide the action.

3. REFERENCES

Law No. 10406/2002	Brazilian Civil Code
Federal Law No. 12.846/2013	Anti-Corruption Law, of August 1, 2013.
Law No. 8.429/1992	Law of Administrative Improbity
UN Global Compact	10 Principles of the Global Compact
7001-SI-8-IC-G00-GE-G-00-MD-0001	Modelo de Cláusula Anticorrupção
7001-SI-8-IC-G00-GE-G-00-MD-0002	Modelo de Questionário de <i>Due Diligence</i> para Terceiros
7001-SI-8-IC-G00-GE-G-00-MD-0004	Modelo de Termo de Recebimento e Compromisso - Interno

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

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

4. ACRONYMS AND DEFINITIONS

Employee: Every individual who is part of the body of INTERTECHNE, except chief officers and board members.

Compliance: The term originates from the English verb to comply which means to comply, obey or attend. In this sense, the expression is used with the meaning of being "in conformity" or in a position of observance and fulfillment of rules, legislation and norms.

CNUCC: United Nations Convention against Corruption.

Ethics: Part of the philosophy that studies moral values and ideal principles of human conduct. Set of moral principles that must be observed in the exercise of a profession.

Corporate Governance: It is the set of processes, customs, policies, laws and regulations that guide the way the company is directed, managed or controlled.

OCDE: Organization for Economic Cooperation and Development.

OAS: Organization of American States.

ILO: International Labor Organization.

UNO United Nations Organization.

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

DPCO: Department of Planning, Control and Budget.

DIS: Department of Informatics and Systems

DPRH: Department of Human Resources.

5. GENERAL CONDITIONS

INTERTECHNE values its reputation and credibility, and the ethical principles that guide its operations contribute to maintaining its image as a solid and reliable entity before its customers, third parties, shareholders, employees and society in general.

INTERTECHNE understands that it must share its values and principles and instruct its employees, chief officers, board members and third parties on the main guidelines that guide its relationships, in order to meet the requirements of good corporate governance practices, ethics and transparency.

This content does not provide an absolute explanation of all laws, regulations, policies and procedures that must be adhered to. Eventually, complex situations are faced that make it difficult to define rules that are sufficiently comprehensive for all circumstances. However, this manual helps to decide how to proceed when there are no specific guidelines and to consider the questions that can guide and determine the most appropriate decision: "What is the right course of action?", "Does it comply with company policies and relevant legislation?" and "How would this be interpreted by the public, the media and public administration?"

5.1. VALUES AND PRINCIPLES

The introduction of strict legislation on corrupt practices and an increasingly intolerant attitude of society in relation to ethical deviations by companies, lead to the establishment of formal mechanisms to prevent the occurrence of practices considered harmful.

The adoption of an Ethics and Compliance Manual aims to protect the company, its employees and managers against the commission of crimes and collaboration with criminal agents, minimizing the risks of criminal liability and attrition in the eyes of public opinion.

The company's Integrated Policy establishes:

"INTERTECHNE, a Brazilian company with international operations, specializing in consulting and engineering solutions, within its mission and objectives, associated with the importance of reconciling socioeconomic development with adequate operational improvement, environmental conservation, health promotion and the control of occupational risks, established an integrated policy with the general precepts described below:

- *Effectively serve your customers;*
- *Provide the continuous improvement of processes;*
- *Make resources available for the use of up-to-date technologies;*
- *Comply with relevant legislation and other requirements applicable to its activities;*
- *Minimize the environmental impacts arising from the activities carried out at its facilities, in particular waste generation, in order to control and prevent pollution; and*
- *Provide adequate conditions for the health and safety of its employees, third parties and visitors, in particular exposure to biological agents and ergonomics, by preventing and minimizing risks in the work environment".*

In order to detail its commitments with honesty and integrity in its administrative and commercial practices, INTERTECHNE created this manual of conduct with the purpose of combating and avoiding all forms of corruption in the countries in which it operates.

The values and principles that guide the anti-corruption policy are outlined through the following premises:

- The company must define clear rules, consistent with its social responsibility and its relationship with customers and third parties.
- Comply with the legislation, both national and of the country in which it is operating.
- Relate correctly with customers and third parties, prohibiting passive and/or active corruption, by receiving or offering advantages, of any nature, beyond the strict fulfillment of their contractual obligations.
- The company's actions and decisions must be fair and include good corporate governance practices.
- No employee will be punished or penalized for delay or loss of business as a result of his refusal to pay or receive a bribe. It is prohibited to comply with instructions from customers, third parties, or employees, chief officers and board members, which conflict with or ignore the conditions established in this Ethics and Compliance Manual or in the applicable/current legislation.
- It is not accepted or allowed to carry out inappropriate, ambiguous or fraudulent accounting entries, and any other procedure that may hide or, in any way, cover up illegal payments.
- Each of the company's employees, directors and directors has the obligation and duty to act with dignity, ethics and respect for the law, in the performance of professional activities and in life as a citizen.

- The company, its employees, chief officers and board members must promote good by acting without prejudice and discrimination of any kind, such as: political, economic, social, religious, race, nationality, gender, age, marital status, sexual orientation, among others.

The principles listed here constitute a common panorama of behaviors and attitudes that should guide: how to interact with colleagues, how to conduct business with associates and third parties, and how to serve customers, the community and environments in which INTERTECHNE operates throughout the world. Such principles must be part of all business decisions, as they reflect who the entity is and design its reputation, giving it respect, credibility and prestige.

6. RULES AND CONDUCT

The Brazilian Penal Code defines corruption in two ways:

- **Active corruption:** “offering or promising an undue advantage to a public official to determine him to perform, omit or delay an ex officio act”.
- **Passive corruption:** “Practiced by the public official who requests or receives, for himself or for others, directly or indirectly, even outside the function or before assuming it, but due to it, undue advantage. Or, even, by those who accept promises for such an advantage.”.

Corruption acts include: bribery (concession; active and passive corruption; crimes against the tax and economic order and against consumer relations; crimes of administrative impropriety); transnational bribery and facilitation payments.

Acts against the integrity of the company include: payment of gifts, premiums and trips outside the legal terms; box two; tax evasion; money laundry; indirect corruption through support and patronage policies.

Based on these definitions, the employee, chief officer or board member must be aware of the following operational procedures established by the INTERTECHNE Ethics and Compliance Manual, in order to prevent violations of the policies described herein and the anti-corruption and anti-bribery laws and regulations that may result in penalties severe civil and/or criminal damages for the company and for the people involved:

- **Payment value:** “Any item of value” includes a very wide range of items. Common examples include cash, gifts, meals, entertainment, stocks, personal property, debt relief, charitable donations, and services. Even if the “value” is small, there is always the potential for violation of current legislation and the principles of this Manual, which must be avoided.
- **Effectiveness of an offer:** Pursuant to the laws of many countries, a violation will have been committed even if the offer of payment or bribe is refused, that is, the mere fact that it was offered already constitutes an offense and both the company and the agent can be punished for this. The mere offer constitutes the violation.
- **Government Officials/Private Companies:** Bribery and corruption between the company and its business partners or with government officials is prohibited. It is important to note that in some cases there are private companies with shareholding in public companies, therefore the prohibition of bribery or corruption is intended to cover any type of case.
- **Use of agents and other intermediaries:** It is important to note that the prohibition against bribery and improper payments also applies to subcontractors or intermediaries. It is essential that contracts with third parties prohibit the payment of

bribes and corruption and that agents or intermediaries are fully aware of and agree with the company's practices established in this Manual regarding the fight against corruption. The practice of acts by third parties may lead INTERTECHNE to be held indirectly responsible for corrupt practices and, therefore, such procedures must be curbed.

- **Bribery prevention:** In some jurisdictions, INTERTECHNE can be criminally convicted if it fails to prevent a bribe made on its behalf by an employee, chief officer, board member or sales agent, for example. In the case of agents, she can be held responsible even if no one in the company has actual knowledge of the bribe. As a precaution, the agent must sign a contract or purchase order with INTERTECHNE containing the anti-corruption clause and the documentation must be filed. In case this manual is violated, INTERTECHNE may take the appropriate penalty measures and, if necessary, cancel the current contract or purchase order.
- **Gifts, meals, trips, hospitality and entertainment:** It is common practice in the business world to have meals for business or even small gifts, travel, hospitality and entertainment. However, such procedures are prohibited when performed with the intent to improperly influence an official act or decision. Amounts associated with meals, travel and accommodation must be limited to those usually adopted by regular company standards and proportionate to the occasion. The duration of the trip must be restricted to the time necessary to fulfill the business purpose and its cost must only cover the amounts directly related to it. Any private activities during the trip must be borne by the interested party, not being allowed to pay expenses to a customer or employee without commercial justification.

Gifts to representatives of private companies or related individuals are acceptable if they are modest and help build and strengthen business relationships. Gifts or gifts to public or private officials related to business dealings must have their value limited to 20% of the minimum wage in force in Brazil and, preferably, must be engraved with the company's name or logo. Gifts in kind are not allowed. It is only up to the Executive Board to authorize the delivery of gifts in an amount above that indicated here. Excessive or disproportionate gifts or entertainment expenses intended to influence the beneficiary to assume a certain position favorable to the company are considered bribes.

Expenses with such items must be detailed in the respective rendering of accounts by the person in charge in order to provide full transparency in relation to the costs incurred and the respective participants.

- **Charitable Contributions:** Charitable contributions made at the direct request, suggestion or recommendation of a government official or business partner are prohibited. Making a donation to such an entity may be considered an indirect bribe made for the purpose of obtaining or retaining contracts, business, government approvals, favorable decisions regarding taxes or customs duties, or to secure any other improper business advantage. Only contributions for legitimate philanthropic reasons are allowed and must be transparent and, where possible, tax deductible.

The contribution request must be made in writing, specifying the organization requesting the contribution, the objective of the contribution and the requested amount. This request must be checked carefully so that no personal benefit occurs.

Contributions must be previously approved by the Executive Board, and under no circumstances can payment be made in cash or through a deposit into a personal checking account.

- **Political contributions:** Contributions to political parties or candidates with company resources or on its behalf are prohibited. As defined under the terms of current legislation, INTERTECHNE employees, directors or directors have the free right to exercise individual political manifestation, including the right to contribute their own resources to political parties or candidates. However, the use of any installation, means or resource and the name of INTERTECHNE for such activity is strictly forbidden.

7. CONFLICT OF INTERESTS

A conflict of interest may arise when a board member, chief officer or employee takes measures or has personal interests that may interfere with the performance of his role at INTERTECHNE.

Employees, Board Members and Chief Officers must avoid real or implicit conflicts between their personal interests and those of the company, which directly involve them or their close relatives. Everyone is prohibited from taking any action that results in their own personal benefit, that of relatives or friends. Commercial decisions must be guided by common sense and objectivity, never by personal convenience, being everyone's obligation:

- Avoid conflict of interests, real or apparent, in relationships with customers, competitors, associates and third parties.
- Refrain from taking for yourself opportunities discovered through the use of corporate assets or through your position within the company.
- Avoid transferring data and information to third parties based on non-public material or information obtained through your position within the company.
- Deprive yourself of competing/competing with the company.

Where there is potential for the emergence of such conflicts, the direct manager must be informed, who will assess the need to consult the Ethics and Compliance Committee or the Executive Board about such a possibility and receive guidance on the procedure to be adopted.

It is not allowed to use company resources to serve private interests or to engage in any activity that is in conflict with the company's business or your work schedule. Likewise, the employee, chief officer or board member cannot become a partner, manager, advisor, consultant, attorney or intermediary in any entity that transacts or is a competitor of INTERTECHNE in any of its activities. Everyone can perform functions of society, management or board of directors in other companies, provided that these do not involve conflicts of interest or interfere with their duties towards INTERTECHNE, and must communicate such activity to their manager.

Some other examples of possible conflicts of interest are: affiliations; jobs and activities of close relatives; investments made by employees, chief officers or board members and their close relatives.

8. CONTRACT OBLIGATIONS 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 acquisition of goods and services by INTERTECHNE must be carried out exclusively based on the quality, safety, price and value they add. Third parties are expected to commit to sharing INTERTECHNE's commitment to integrity and fair dealing.

Third parties must, in the exercise of their activities, adopt honest, dignified conduct, with strict observance of applicable laws, respect for human rights, the environment and ethical standards of society.

In their business actions, third parties must comply with all applicable laws and regulations in the country or region in which they are operating, observing the highest standards of honesty and integrity, avoiding the occurrence of situations that may appear suspicious.

Third parties must also ensure the selection of business partners, who must act in accordance with current legislation relating to their activities, especially Law No. 12,846/2013 ("Anti-Corruption Law").

Third parties must also carry out a procedure to verify the practices of commercial partners prior to the decision to maintain commercial relations with them, in order to identify any deviations in conduct in relation to the principles and values of this Ethics and Compliance Manual.

Third parties are responsible for damages arising from the practices and acts of their commercial partners that may fall, or fall, on INTERTECHNE.

Access to information made available by INTERTECHNE to third parties must be limited to those people who need to receive the information, and its use must be limited to the specific purpose of providing or providing the service.

All matters concerning INTERTECHNE must be treated by its third parties with secrecy, confidentiality and protection of intellectual property rights.

The company strives for meritocracy and fair competition in the markets. The same behavior will be expected from your third parties.

Third parties are prohibited from promising, offering or giving, directly or indirectly, an undue advantage to a public, private or third sector agent, or a third person related to them, with the intention of influencing any act or decision to promote their own interests or those of INTERTECHNE.

Contracts entered into with third parties must establish clauses that oblige them to respect INTERTECHNE's Ethics and Compliance Manual, maintaining compliance with applicable and current anti-corruption laws.

INTERTECHNE respects and promotes human rights in its activities and in its commercial and work relations and only admits the establishment of a commercial relationship with Third Parties that also respect them and observe the principles and values listed below:

- Third parties must accurately and punctually pay all taxes and duties due in connection with the exercise of their business activity.
- INTERTECHNE's contractors must not tolerate, allow or condone the use of forced and/or child labor, the sexual exploitation of children and adolescents and human trafficking in any process related to their activities, always respecting the rights of children and adolescents and the resolutions of the ILO – International Labor Organization.
- INTERTECHNE's outsourced workers must provide their employees with dignified working conditions in terms of working hours, health and safety, always respecting

the labor legislation of the place where they are working. They must remunerate their members in a fair, dignified manner and based on objective evaluation criteria, providing all legally determined benefits.

- INTERTECHNE requires that its outsourced workers strictly comply with the labor legislation of the places where they operate and observe the collective agreements and conventions in force, without this implying the establishment of any link with INTERTECHNE.

INTERTECHNE's Planning, Control and Budget Department will be responsible for issuing an Addendum to the contracts in force for the inclusion of an anti-corruption clause, according to the models provided in the documents 7001-SI-8-IC-G00-GE-G-00-MD-0001 Modelo de Cláusula Anticorrupção and 7001-SI-8-IC-G00-GE-G-00-MD-0002 Modelo de Questionário de *Due Diligence* para Terceiros.

9. CONFIDENTIALITY AND USE OF INFORMATION SYSTEM

All information made available to employees and third parties, due to the performance of their roles and activities, including, among others, any and all oral and/or written information, transmitted and/or disclosed by the company, will be considered confidential, restricted and owned by the company.

The intellectual property, both of the company and of its customers and third parties, must be respected and preserved.

Due to its activities and relationships with customers and partners, INTERTECHNE develops and has access to confidential information that includes: i) written documents, graphics, visuals or virtual information contained in computer programs or kept in electronic storage files; (ii) prototypes, samples, blueprints, or equipment and information related to patents, patent applications, research, business plans and/or products, know-how, technical or commercial proposals, products, developments, inventions, processes, designs, formulas, engineering and market studies, regulatory information, data and analysis, reagents, biological materials, chemical formulas, third-party contracts, services, consumers, marketing or finance. Confidential information must be kept confidential by everyone who has access to it, whether as a result of professional activity or personal relationships. Anyone who has access to confidential information cannot disclose it to anyone, not even other members of the company, market professionals, friends and relatives, nor use it for their own benefit or that of third parties.

In order to guarantee the integrity, confidentiality and availability of information, everyone must be aware that:

- Professional secrecy covers all information about the business, including commercial promotion plans, contracts, customer lists, databases, patents and intellectual property, systems, programming, IT, costs, strategies and matters of commercial competitiveness. Failure to observe confidentiality will be subject to the determination of responsibilities in the civil and criminal spheres. Intellectual property is understood to mean any and all important documents or files recorded on the corporate network, on INTERTECHNE's servers or computers.
- All documentation produced within the scope of the development of its functions or obtained as a result of its function is the property of the company and cannot be reproduced, copied or presented to third parties without prior and express consent.
- Each employee, chief officer and board member is responsible for protecting the resources made available to them and must immediately report any threat or event that could bring harm to the company.

- Even after leaving and/or breaking the employment relationship, for whatever reason, employees will remain obliged to observe the rules in force, being subject to the verification of responsibility in the judicial sphere.
- Employees may not use or provide company information that is no longer public without prior authorization from the Executive Board. The confidentiality of data must be preserved and knowledge of the company's internal situation or data cannot be used inappropriately.

The company provides an electronic address and the Internet to all its employees, chief officers and board members, for exclusively corporate purposes. Its use must be made for questions related to the professional activities and the purpose of the company, however, personal use in a moderate way is allowed, being forbidden to use it for political manifestations, of a discriminatory nature or with inappropriate content and in disrespect for the law.

INTERTECHNE will be able to monitor the use of the Internet, including the time of use and the sites visited. This monitoring will only serve to ensure compliance with INTERTECHNE's IT Policy and mainly to prevent the use of these means for unauthorized or illegal purposes.

INTERTECHNE will be able to verify the content of e-mails sent from corporate e-mail addresses (@intertechne.com.br and @inttpartner.com.br). This check will serve to ensure compliance with the company's security policy.

Employee, chief officer or board member must not send or access correspondence related to their professional activities using open email systems (Hotmail, Gmail, among others) due to information security risks. The use of these resources can only happen with the express authorization of the Executive Board.

The use of open e-mail systems (Hotmail, Gmail, among others) for sending/receiving personal material through the INTERTECHNE network is not permitted.

In special cases and with DIS authorization, file sharing will be allowed through OneDrive, WeTransfer and Dropbox tools, among others.

Under no circumstances will the installation and use of "pirated" software or software that does not respect intellectual property rights, as well as those that violate good customs or that promote discrimination of any kind or type, be allowed.

Browsing the Internet must be carried out in accordance with the needs of the company, being allowed to use it for personal purposes in a moderate manner. Access to Internet sites with content that is inappropriate for the work environment, that constitutes disrespect for laws or that causes embarrassment of any kind to other employees, is prohibited. All internet browsing may be monitored by the company.

The storage of personal files on company computers and servers that have inappropriate content and/or that may violate the integrity of the company will not be allowed, with the employee, chief officer or board member being responsible for the archived content and for improper storage on the network and for its content.

It is prohibited to make copies and backups, by any means or form, of any document received under the employment relationship.

It is not allowed to copy documents from the INTERTECHNE network to personal computers.

The password for accessing the company's network and systems is for personal use, must be kept confidential and the employee is fully responsible for the actions and accesses performed from his user login.

The use of personal equipment (notebooks, cell phones, tablets, etc.) connected to the company's corporate network (wired and wireless) is prohibited.

It is prohibited to speak on behalf of INTERTECHNE on social media unless expressly authorized.

The installation and updating of software by the employee are prohibited. All installations and updates must be carried out by the company's IT department.

10. ETHICS AND COMPLIANCE COMMITTEE

The main objectives of INTERTECHNE's Ethics and Compliance Committee are to ensure constant 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 claim that an employee, chief officer, board member or third, may have violated the company's standards of conduct and report its findings to the Chief Executive Officer.

The Ethics and Compliance Committee will be composed of four (4) representatives, requiring at least one (1) representative from the administrative area and one (1) from the technical area.

It will be incumbent upon the Financial and Administrative Board to provide training to employees, chief officers and board members for knowledge and perfect understanding of the content and provisions of the Ethics and Compliance Manual.

The Ethics and Compliance Committee will be responsible for verifying the correct description of the complaints received; the specific conditions of the occurrence; the people and companies involved; and the evidence that helps in the evaluation of the theme and in the forwarding of actions. The registration must be forwarded to the Chief Executive Officer for analysis and deliberation at the first meeting of the Executive Board subsequent to the aforementioned registration.

The Ethics and Compliance Committee must prepare an annual report on its activities, reporting the occurrences and complaints verified in the period and the measures adopted, as well as suggesting improvements in the guidelines and practices aimed at preventing and fighting corruption within the company and its businesses. The annual report must be forwarded to the Executive Board and the Management Board.

11. PENALTIES

Failure to comply with any guidelines or principles established in this Manual will not be tolerated and will be subject to disciplinary sanctions, without prejudice to the application of current laws. The practice of fraud and bribery by an employee, chief officer or board member is punishable and will result in sanctions that may include termination of the employment contract, in addition to civil and even criminal liability.

No employee has the authority to make exceptions or grant waivers to company policies. In case of doubt, board members, chief officers and employees are expected to seek clarification and guidance. In instances where the Company, after review, approves an activity or situation, this will not mean granting an exception or waiver, but rather a determination that there is no policy violation. If the company determines that there has been a policy violation, appropriate action will be taken.

12. DISCLOSURE AND COMPLAINTS

All employees, directors and directors must read INTERTECHNE's Ethics and Compliance Manual and confirm it in writing, through the Receipt and Commitment Term, 7001-SI-8-IC-G00-GE-G-00-MD-0004 Modelo de Termo de Recebimento e Compromisso - 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 will be made through the Knowledge Portal on the Intranet and the company's website. All revisions will be informed to employees, directors and board members through e-mail.

INTERTECHNE reinforces its commitment to ethics and high standards of business conduct and expects all employees, chief officers and board members to report suspected violations of laws and company policies. Everyone at INTERTECHNE is responsible for reporting violations of this Manual and should do so directly to their manager, to the Executive Board or, anonymously, to the Ethics and Compliance Committee through the e-mail address: etica@intertechne.com.br or physical address of the company's headquarters in Curitiba. You can also do so through the Communication Channel on the Intranet – Talk to the CEC (Ethics and Compliance Committee). Confidentiality is respected throughout the research process.

Potential situations of fraud, abuse or violations of the law and the company's policies and internal controls must be reported, as well as any requests for conduct guidance made by employees.

Employees, chief officers, board members and third parties may report and consult anonymously and/or directly. All complaints will be duly analyzed and dealt with by the members of the Ethics and Compliance Committee. The company encourages employees, officers and directors to ask questions, express concerns and make suggestions appropriate to INTERTECHNE's business practices.

Everyone who responds to questions, doubts, complaints and suggestions from employees, chief officers or board members must do so with adequate discretion regarding anonymity and confidentiality, although the preservation of anonymity and confidentiality may or may not be 100% feasible, depending on the circumstances. For example, investigations of significant grievances may require disclosure of the allegation/reported and its reporting to the Executive Board. The confidentiality of the complaints will be observed, and any type of retaliation against the whistleblowers will be strictly prohibited. Any employee, chief officer or board member who engages in retaliation will be subject to company discipline, including, but not limited to, termination of employment. No action or threat may be taken against any employee, officer or director for asking questions, expressing concerns or making complaints or suggestions pursuant to the procedures described herein, unless the employee, chief officer or board member acts with willful disregard for the truth of the facts.

INTERTECHNE expects honesty from its board members, chief officers and employees at all levels. Failure to comply with the provisions herein may result in corruption and demoralization of the organization. INTERTECHNE's management system will honor honesty, which includes the transparency of its accounting, serious and fair budget proposals with honest economic evaluations of projects.

With the aim of providing a work environment that promotes mutual respect between board members, chief officers and employees and harassment-free work relationships, INTERTECHNE specifically prohibits any form of harassment BY or FOR board members, chief officers, employees, third parties or customers. According to the company's principles, harassment is any inappropriate conduct that has the purpose or effect of:

- Create an intimidating, hostile or offensive work environment.
- Interfering with an individual's professional performance without justification.
- Influencing an individual's job opportunity.

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

- Verbal or physical aggression.
- Derogatory or discriminatory acts, content, statements and comments whether by race, color, sex, ethnicity, social class, age, physical characteristics, nationality,

religion, disability, marital status, sexual orientation, union membership, party affiliation or political conviction.

All employees, chief officers and board members will be subject to disciplinary action, including dismissal for any act of harassment. Any individual who believes he or she has been a victim or who observes or learns of harassment must immediately report the incident to their area manager or the Ethics and Compliance Committee. All complaints will be investigated promptly and thoroughly. No employee, chief officer or board member should assume that the company is aware of an issue.

No retaliation will be taken against any employee, officer or director for reporting a concern regarding possible acts of bullying. Employees, chief officers and board members can raise concerns and reports without fear of reprisals, always being governed by common sense.

For the external public, an e-mail address must be disclosed on the company's website, which will be directed to the four representatives of the Ethics and Compliance Committee. The e-mail is: etica@intertechne.com.br.

13. REGISTRATION RECORDS CONTROL

Identification	Storage		Protection	Recovery	Retention period	Discard
	Place	Responsible person				
Contract, Purchase Order or Anti-Corruption Clause	Network and Physical Folder	DPCO	File Back-up	By contract	Permanent	Server backup
Due Diligence Questionnaire for Third Parties	Network and Physical Folder	DPCO	File Back-up	By contract	Permanent	Server backup
Receipt and Commitment Term - Internal	Physical folder	DPRH	File	By employee	20 years	Archive