ANTI-CORRUPTION POLICY

PO-JUR-005-01 – Anti-Corruption Policy

SYNERGYE
TECNOLOGIA DA INFORMAÇÃO

CERTIFIED COMPANY
ISO 9001
QMS CERTIFICATION

MESSAGE
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title

ANTI-CORRUPTION POLICY

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1 GOAL

1.1.1 goal

1.1.2 The Anti-Bribery and Anti-Corruption Policy aims to clarify to all employees their position regarding to the actions considered as acts of corruption. The company requires everyone to comply with its Code of Conduct and all its current policies, as well as strict observance of the laws and regulations in force in Brazil and the places where they carry out their activities, which deal with corruption.

1.1.3 SYNERGYE does not condone bribery, active corruption, passive corruption, payment for facilitation, money laundering, influence peddling, concussion, and any other corrupt practice in the conduct of its business.

2 ACRONYM AND DEFINITIONS

Public agent	Person holding a legislative, administrative or judicial position, whether by appointment, election or succession, or any person exercising a function public, including for a body public or a public corporation, or any agent or officer of an organization national or international public office, or any candidate for public office .
CCO	Chief Compliance Officer
Ethics Committee	It is an interdisciplinary and independent collegiate, of a consultative, deliberative, and educational nature, created to defend the interests of research participants in their integrity and dignity and to contribute to the development of research within ethical standards.
Conflict of interest	It is a self-interest, where a candidate/employee can be influenced to act against the company's principles, making an inappropriate decision or failing to fulfill some of their professional responsibilities. These are situations in which the person's judgment and/or attitude is perhaps distorted in favor of other interests, to the detriment of those of the organization.

Corruption	Abuse of power or procedures for personal or dishonest benefit. Corruption can take many forms, such as bribery, bribery, conflict of interest, collusion (manipulation of proposals, cartels, and price fixing), patronage, illegal information agency, use of privileged information, price fixing, evasion tax, among others.
Fraud	Intentional act of obtaining an undue advantage for oneself or another, whether financial, using shady or illegal methods, inducing, or keeping someone in error.
Business partner	External party with which the organization has, or plans to establish, some form of business relationship. Business partner includes, but is not limited to, customers, joint ventures, joint venture partners, consortium partners, third-party providers, contractors, consultants, subcontractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, and investors. This definition is deliberately broad and should be interpreted in line with the organization 's bribery risk profile, so that it is applied to business partners who could reasonably expose the organization to bribery risks.
Politically Exposed People	People who perform or have performed, in the previous five years, in Brazil or in foreign countries, territories and dependencies, positions, jobs or relevant public functions, as well as their representatives, family members and other people in their close relationship.
Bribery	Act of offering, giving, requesting, authorizing or receiving money, gift, thing of value, undue advantage, or any type of offer made as a way of inducing the practice of any act, omission, influence or
Undue Advantage	Any private advantage, payment, or benefit, direct or indirect, tangible or intangible, to which a person is not entitled.
Acronym/name	Concept/explanation

3 REFERENCE DOCUMENTS

3.1.1 Reference documents

3.1.2 Law No. 12,846/2023: Provides for the administrative and civil liability of legal entities for carrying out acts against the public administration, national or foreign, and provides other measures.

3.1.3 Law No. 8,112/1990: Provides for the legal regime of civil servants of the Union, local authorities and foundations federal public .

3.1.4 Law No. 12,813/2013 – Conflict of interest

3.1.5 Law 8,313:1991 – cultural sponsorship – Pronac

3.1.6 Law No. 8,429:92 Administrative Improbity

3.1.7 NBR ISO37001:2017 – Anti-bribery management system requirements

4 SYNERGYE DATA

The Company is located in São Paulo – SP:
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Facebook: https://www.facebook.com/SYNERGYEtec
CNPJ: 07.052.354/0001-29

5 GENERAL CRITERIA

5.1.1 General criteria

5.1.2 Any offer, promise, authorization or payment of money or any item of value to employees is prohibited. public or their families, directly or indirectly, through partners, aiming for an improper advantage. These actions They are considered a crime under the Brazilian

Anti-Corruption Law and international laws and agreements.

5.1.3 Payment for facilitations It is also considered a crime under Brazilian legislation (Law 12,846/13). Therefore, it is prohibited for payments to be made for facilitations, whether by its Employees, Partners or third parties when acting on behalf of **SYNERGYE.**

5.1.4 It is, therefore, prohibited to offer or promise money, gifts, favors or any form of benefit to an individual with the intention of influencing the performance of an employee public, so that it grants advantages or benefits of any nature.

5.1.5 Any offer, promise, authorization or payment of money or any item of value to agents of private companies, organizations or associations of any other nature is also prohibited.

5.1.6 Money laundering is also considered a crime under Brazilian law and a prohibited practice in our business.

5.1.7 All gifts or hospitality (travel, meals, entertainment) offered to Public or private Authorities must strictly follow the procedure and limits contained in the Gifts and Hospitality Policy.

5.1.8 Processes for Donations and Sponsorship are established in the Sponsorship and Donations Policy.

5.1.9 In view of the company's commitment to society, all Employees involved in bidding processes, layoffs, non-enforceability, and other forms of negotiation, in accordance with the law, with the Public Sector, must be engaged so that best practices are applied.

5.1.10 All relationships with agencies public companies must follow the rules set out in the notice, in the Brazil Bidding Law (8,666/93), State-Owned Law No. 13303/16 and the Anti-Corruption Law (12,846/13), as well as in all other laws applicable to the bidding process and the sector, which also provide for conduct classified as crimes, in this way:

a) Maintain absolute transparency in all information exchanged and discussed.

b) Record the action internally, clearly, and precisely;
c) Formalize all documentation delivered.

5.1.11 Some situations may highlight the occurrence of inappropriate practice, and, in these cases, there is a need to investigate to ensure the legality of the situation. Examples of situations that require attention are:

a) Contracting structures atypical or extremely complex and without a reasonable basis for such a structure.

b) Travel expenses or gifts involving employee's public and people related to them.

c) Request to hire a third party, indicated by an employee public.

d) Multiple payments of value to the same third party.

e) Excessively high value for the service in question or not consistent with the stature of the contractor.

f) Payments in cash or to unidentified accounts

g) Payments for services not provided.

h) Contracted company owned by an employee public or people related to it.

i) Payments to bank accounts in a country other than the contractor's headquarters or in places where the contractor has not performed the service.

j) Payments into individual accounts.

5.1.12 The situations presented above do not are exhaustive and not They are evidence that there is illegality in the actions, however, they are points of attention that need to be monitored and analyzed.

5.1.13 Anti-Corruption Laws They not only penalize the individual who pays a bribe, but also the individuals who encouraged its payment as described:

a) Approve payment of bribes
b) Provide and accept fraudulently issued invoices.
c) Guidance on payment of bribes.
d) Cover up or cooperate with paying bribes.

5.2 Hiring employees public, their families or related people

5.2.1 Hiring employees public officials, their advisors or family members is sometimes used to cover up acts of corruption. As a result, the following rules were established for hiring in these situations:

a) Hiring an employee acting public, their family members and advisors will only occur if there is no legal provision that prevents it, and must occur only depending on the qualification's techniques and never with the intention of obtaining any form of advantage, benefit, or favoritism.

b) They must not be carried out with the intention of influencing, directing actions, or obtaining any type of advantage or benefit, whether for themselves or for **SYNERGYE.**

c) Candidates to fill a vacancy on the staff who are employee's public, family members or employee advisor's public must follow the recruitment and selection process, without benefit of any kind.

d) Hiring must occur based on real need and a pre - existing vacancy.

e) Hiring of former employees must be carried out with the approval and formalization of the director of the contracting area and after verifying the existence of some type of quarantine required by the Administration Public where the candidate held his position. The hiring of a former public servant must be based on their technical attributes, disassociating them from the position they held and basing the values on market parameters.

f) Any employee who has a first-degree family member in the public service, holds a position of a special nature or holds a management position and Senior Advisor must communicate to the immediate manager.

5.3 Hiring partners

5.3.1 Hiring partners

5.3.2 Current legislation provides for the liability of legal entities even if acts understood as corruption are carried out by partners, acting for their benefit.

5.3.3 The hiring of partners will only be carried out in the face of a real need for the services covered by the contract and must not grant privileges or benefits of any nature. In cases where the partner works on a project related to Government Body, analyzes regarding suitability, integrity and performance ethics must be in-depth, basing the hiring strictly on the contractor's technical assumptions.

5.3.4 Simplified contracts, such as simple supplies, must have adequate technical capacity.

5.3.5 relationships should only be established with companies committed to ethical aspects and the fight against corruption, formalized in the service provision contract.

5.3.6 The project on which the partner will work and the reason that generated the need for hiring must be clarified.

5.3.7 The suitability analysis is the responsibility of the area manager and will be submitted to the person responsible for Compliance, who will ratify whether there is any ethical impediment or risk to this hiring.

5.3.8 If no impediment is identified, the Executive Director will approve or not the hiring.

5.4 Regarding the limits of action

5.4.1 Limits of action

5.4.2 Partners acting on behalf of the organization must adhere to the scope defined in the contract and not are authorized to carry out any negotiations with the public or private sector that are not expressly provided for in the contract.

5.4.3 They are prohibited from making any type of offer or promise to employee's public, family members and their advisors, whether in the form of a gift, toast, travel, hospitality, invitations to entertainment, money, favors or advantages.

5.5 Payments to partners

5.5.1 Payments to Partners must follow internal rules and contractual provisions, and the following precautions must be taken:

a) not be made in cash or via bearer document.

b) Payments will only be made to a bank account in the name of the hired Legal Entity or, exceptionally, in the case of hiring an Individual, to a current account held by them.

c) Payments must not be made to a bank account in a country other than the one in which the service was provided, or even in a country where the contracted company does not have a headquarters or branch, or in places banking companies qualified by the Central Bank of Brazil as tax havens.

d) Proof of the actual value of the service provided and other information will be

required necessary for the proper registration of the operation.

5.6 Reporting non-compliance or suspected violations

5.6.1 In the case of a situation of doubt, in which the conduct to be taken is not clear in this code or in the policies linked to it, or in which it is understood that the code is not being met, the employee has the responsibility to ask for guidance and report. In cases like this, immediately contact your superior, Human Resources or CCO.

5.6.2 As defined, reports and complaints received will be treated as confidential.

5.6.3 No partner, executive, collaborator, or supplier will be retaliated against or penalized for:

5.6.4 Loss of business resulting from your refusal to negotiate, offer, promise, receive, facilitate, pay, authorize, or provide bribes.

5.6.5 Present concern or in good faith, facts of suspected bribery or violation of this policy.

5.6.6 No type of retaliation is permitted against employees who make a report or complaint, if they are in good faith.

5.7 PENALTIES PROVIDED IN CASES OF INFRINGEMENT

5.7.1 Penalties

5.7.2 Brazil law 8,666/93 provides for penalties for individuals who carry out acts contrary to the execution of bids public.

5.7.3 Penalties for legal entities in the face of non-compliance are provided for in law 12.846/13, which also provides for sanctions rigidities that impact employees.

5.7.4 Disrespect for the principles of Policy Anti-corruption will subject employees to appropriate disciplinary and legal actions.

5.7.5 In the case of partners acting on behalf of **SYNERGYE** and who contravene the provisions of this Policy, actions must be taken, including the application of contractual penalties, termination of the contract and legal action for reparations for losses suffered by the contractor.

5.7.6 The legal entity penalties provided for by Law 12,846/13 do not prevent natural persons who committed the action defined as a crime from also being punished in the legal sphere.

5.8 TRAINING

5.8.1 Training

5.8.2 All employees will receive specific training on the Anti-Bribery and Anti-Corruption Policy and its implications. The training will be mandatory and will be extended to controlled companies, partners, and suppliers, if necessary, in a plan defined by governance.

5.8.3 In the process of integrating new employees, information about the Compliance policy links is passed on to new employees.

5.8.4 We periodically refresh this training with all employees.

5.8.5 This Policy It may be revised at any time, as long as necessary.

5.9 SANCTIONS

5.9.1 Sanctions

5.9.2 Non-compliance and violations of any of the provisions listed in this document will subject those responsible to disciplinary penalties recommended by the Ethics Committee and applied by the competent leadership, according to the nature and severity of the infraction committed, in addition to any penalties provided for in specific legislation.

5.9.3 Sanctions will also be applied, where appropriate and in accordance with the law, to any person who, by virtue of law, contract or any legal act, directly provides services on a permanent, temporary, exceptional or occasional basis.

5.9.4 Penalties in case of false information or omission of information that characterizes a conflict of interest:

a) CLT: warning, suspension or just cause, under the terms of the CLT.

b) Legal Entity: Notification, restriction for possible future hiring and/or termination of the Contract, as applicable.

6 RECORDS

Identification	Protection	Storage	Recovery	Filing time	Disposal
Conflict of interest analysis	Login, password, and backup	SharePoint/ Forms	Chronological and numerical	5 years	Delete
Due diligence	Login, password, and backup	Forms	Chronological and numerical	5 years	Delete

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