REPORTING PROCEDURE

PR-JUR-001-01 – Reporting Procedure

SYNERGYE
TECNOLOGIA DA INFORMAÇÃO

CERTIFIED COMPANY
ISO 9001
QMS CERTIFICATION

MESSAGE
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ISO 9001
CERTIFICATION

title

REPORTING PROCEDURE

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PR-JUR-001-01	Not applicable

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Comments

REVISION LOG

REVISION	DATE	RESPONSIBLE	REVIEW SUMMARY
01	10/30/2023	Marcelo Almeida	Initial issue.

SUMMARY

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1 OBJECTIVE

1.1 Reporting procedure

1.1.1 The objectives of this document are: to determine the rules for the functioning of the Ethics CHANNEL. Analysis of the origin of the concerns of internal and external interested parties and the treatment of complaints received and

1.1.2 Establish the rules for creating, maintaining and operating the Compliance Committee

2 ACRONYM AND DEFINITIONS

Ethics Committee	It is an internal, integral body, whose mission is to ensure compliance with regulatory requirements, Code of Conduct and Policies
Ethics Channel	Mechanism responsible for mapping vulnerabilities and helping to diagnose problems that the organization has with regard to Ethics and Compliance. It allows specific disruption actions to be identified and directed so that, subsequently, there is containment and recovery – as well as improvements in the internal structure
CCO - Chief Compliance Officer	Person(s) with responsibility and authority for the operation of the Anti-Bribery management system

3 DESCRIPTIONS AND RESPONSIBILITIES

3.1 General information

3.1.1 The Ethics Committee is composed according to the deliberation recorded in the ATA, as follows:

a) Carlos Fidalgo – Director of Operations;
b) Karla Sampaio – Finance Manager;

c) Andréa Magalhaes – Human Resources Manager.

3.1.1.1 Other members may be invited to form another multidisciplinary team, when applicable.

3.2 Ethics Committee

3.2.1 Objective of the Ethics Committee

a) Support Senior Management in the implementation, maintenance and improvement of the Anti-Bribery Management System and Compliance Program;

b) Address concerns and queries specific to the Compliance Program of interested parties;

c) Assess and, where appropriate, investigate any bribery, violation of the Anti-Bribery policy, the Compliance program, that has been reported through communication channels, detected or reasonably suspected;

3.2.2 Functioning of the Ethics Committee

3.2.2.1 Ordinary meetings are held every six months, with a minimum quorum of 3 members including the CCO.

3.2.2.2 Other members as many as necessary may be invited to the same event, taking into account the criteria of complexity and specificity of the matter.

3.2.2.3 Whenever a matter so requires, the Ethics Committee may call on personal and/or material assistance from other areas that are part of the organizational structure, such as Human Resources, Administration and Finance, Quality, etc.

3.2.2.4 The minimum agenda for the regular meetings of the Compliance Committee:

a) Concerns received through the reporting/questions/suggestions channels;

b) Status of investigations;

c) Planning feedback to interested parties;

d) Due results Diligence ;

e) Treatment of non-compliance and status of corrective actions;

f) Change analysis;

g) Impact analysis of new/changed regulatory requirements. Form of communication to interested parties;

h) Update of the Bribery Risk Assessment Table.

3.2.2.5 Meetings are recorded in Minutes.

3.2.2.6 Extraordinary meetings may be called and planned by the CCO. The minimum quorum is three members, including the CCO.

3.2.2.7 The extraordinary meeting is recorded in the ATA.

3.3 Reporting channel

3.3.1 The Reporting Channel aims to map vulnerabilities and help diagnose problems that the organization has with regard to Ethics and Compliance. It allows specific disruption actions to be identified and directed so that, subsequently, there is containment and recovery – as well as improvements in the internal structure

3.3.2 Any internal or external interested party may make a report in good faith, or based on a reasonable attempt to believe, suspected or actual bribery, or any violation or weakness of the Anti-Bribery management system through the Reporting channel which will initially be received by the CCO, as long as he is not involved with the reported concern. In this case, the report will be forwarded to the Financial Administrative Directorate.

3.3.3 Available are:

a) The CCO's email, via the official **SYNERGYE website** .
b) The Administrative-Financial Director's email, via the official **SYNERGYE website** .
c) Direct and confidential communication with the CCO and the Financial Administrative Director.

3.3.3.1 Any demand received will be guaranteed anonymity and confidentiality.

3.3.3.2 Complaints are analyzed by the CCO and another member of the Ethics Committee. When the complaint comes from the CCO, the complaint will be analyzed by the Financial Administrative Board and another member of the Ethics Committee.

3.3.3.3 If the reported concern is valid, the investigative process begins. When necessary, other processes can be involved (Human Resources, legal, etc.).

3.3.4 The investigation of the reports received is done effectively, however, preserving those involved, employing well-defined processes and responsibilities, and using appropriate techniques for collecting information and evidence.

3.3.5 Whenever the adoption of any measure depends on an act within the exclusive competence of the Board, the Ethics Committee must, after exhausting or associated with the acts within its competence, propose a resolution to the Board.

3.3.6 The following acts under the jurisdiction of the Ethics Committee are now foreseen:

a) Summon employees to provide information;
b) Obtain information from internal records;
c) Warn in writing those employees who are in violation;
d) Apply to employees, together with the Human Resources area, the penalties provided for in the Collective Labor Agreement – CLT, union agreement and Brazilian legislation applicable to combating corruption;
e) Decertify business partners; according to the disqualification process;
f) Request the suspension of payments to suppliers to the Administration and Finance area.

4 RECORDS

Identification	Protection	Storage	Recovery	Filing time	Disposal
AT	AT	AT	AT	AT	AT

PREPARED BY:	VERIFIED BY:	APPROVED BY:
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