

ANTI-CORRUPTION POLICY

Summary

1.	Introduction	3
2.	EAH TRADING internal controls and compliance system and integration	3
3.	Scope of application	4
4.	Contextualization	4
5.	Definitions.....	7
6.	Behavioral directives.....	9
7.	Scope of the EAH TRADING integrity program	10
8.	Situations not covered.....	16
9.	Term.....	16

1. INTRODUCTION

The EAH TRADING Anti-Corruption Policy ("Policy") establishes anti-corruption directives for the actions and conduct of those who act on behalf of EAH TRADING, in order to align them with the terms of the applicable legislation in all interactions with current and future clients (public or private sector), public agents, suppliers, donors or sponsors, regardless of where the company operates.

In addition, the Policy aims to:

- Establish the directives and responsibilities of EAH TRADING that ensure and reinforce the commitment of the institution to prevent and fight corruption and other similar illicit practices established in the legislation in force.
- Describe the behavioral rules to be followed in the conduct of activities developed by EAH TRADING that ensure compliance with anti-corruption laws (in particular, with the Anti-Corruption Law and the rules to prevent corruption and similar illicit practices).

In addition, establish a requirement that EAH TRADING companies conduct all of their activities with the public and private sectors with integrity and the highest ethical standards.

Herein is required compliance with the EAH TRADING Code of Ethics and Conduct and all applicable laws and regulations in force relating to combating corrupt practices, including but not limited to the OECD Convention; the Inter-American Convention and the UN Convention, United Kingdom Bribery Act 2010 (*U.K. Bribery Act - UKBA*) and the *Foreign Corrupt Practices Act - FCPA* and, in particular, the Brazilian Law 12.846/13 (Anti-Corruption law).

This *Policy* is included in the *EAH TRADING Internal Controls and Compliance System* as the document that establishes the actions and directives for compliance with anti-corruption laws and, in particular, defines the EAH TRADING Integrity Program described in article 41 of Decree 8.420/15:

*"The **Integrity Program** consists, with regards to a legal entity, of a set of internal mechanisms and procedures for integrity, auditing, and incentive to report irregularities and the effective application of codes of ethics and conduct, policies and directives with the purpose of detecting and correcting deviations, frauds, irregularities and illicit acts practiced against the national or foreign public administration."*

2. EAH TRADING INTERNAL CONTROLS AND COMPLIANCE SYSTEM AND INTEGRATION

Policy cannot be observed in isolation. Recipients can refer to other EAH TRADING Policies that relate to its Integrity Program, such as:

- Internal Controls and Compliance Policy
- Code of Ethics and Conduct

Each of these documents has specific purposes, but all reinforce EAH TRADING's commitment to probity and lawful practices.

The following actions are still part of the *EAH TRADING Integrity Program*, all under the guidance and coordination of the Executive Board:

- Ensure distribution of this Policy to all recipients;
- Qualify the recipients, by means of lectures and training, about the content, especially in the matter concerning corruption (conceptualization, development, impediment practices, control, and prevention);
- Insert in all contracts signed with clients, suppliers, donors, sponsors, or business partners specific clauses of accountability for acts of corruption of which EAH TRADING was previously unaware;
- Request recipients to fill out the *Integrity Program Verification Term* and/or sign the *Term of adherence to the EAH TRADING Code of Ethics and Conduct* from the beginning of the partnership with the company. The details regarding the distribution, to the receiving public of each term and the collection of signatures will be described in a specific Standard of Procedures;
- Request customers, suppliers, donors or sponsors to fill out the Integrity Program Verification Term and/or sign the term of adherence to the EAH TRADING Code of Ethics and Conduct from the beginning of the partnership. Details regarding the distribution, the public for each of the terms and the collection of signatures are described in a specific Standard of Procedures;
- Disseminate the EAH TRADING documents related to this Policy among its managers, reinforcing the commitment of these people to the adherence of their actions to the EAH TRADING Integrity Program;
- Deal, via Ethics Committee, with the complaints and facts presented, through the communication channels informed in the EAH TRADING Code of Ethics and Conduct, directly to managers, and even anonymously;
- Evaluate customers, suppliers, donors, sponsors or business partners from a standardized process, before the beginning of the relationship and during its development, with the use of internal and external information grouped in the EAH TRADING Single Registry.

3. SCOPE OF APPLICATION

The Policy applies to all the employees of EAH TRADING , service providers, officers, board members, suppliers, business partners and customers, whether individuals or legal entities, including Public Administration bodies/entities that contract EAH TRADING services (collectively, the “recipients”).

4. CONTEXTUALIZATION

4.1. CORRUPTION

The origin of the word "corruption" comes from the Latin "*corruptio -onis*", and it means deterioration, effect, act or process of corrupting. In the public sphere, it can be said that a corrupt is the agent who, in the exercise of one's function or position, carries out *purpose deviation*, serving purposes distinct from the public interest, with the aim of obtaining benefits of a private order¹.

Corruption is a complex phenomenon that does not necessarily have to be defined solely by its legal spectrum. It can occur in different ways, and in different nuances. It is commonly associated with the public service; however, it is not obligatorily linked to a public authority or agent, and may also occur in the private sphere.

To characterize corrupt behavior, all that is need is for an illicit practice to occur – by action or omission for one's own benefit or for the benefit of others - between two or more people, transgressing the group of norms to which they are bound. It is worth noting that the Penal Code admits the attempted form of this crime.

The Anti-Corruption Law not only aims to tighten the accountability of legal entities that are involved in acts of corruption but, in this context, also encourages a more proactive stance to prevent illicit practices.

4.2. HARMFUL ACT

In order for the practice to be considered wrongful, it is essential that it was committed in an attempt against the national or foreign public patrimony, principles of public administration (national or foreign) or the international commitments

¹ PRADO, Luiz Regis. *Tratado de Direito Penal Brasileiro: parte especial (arts. 250 a 361)*. Vol. 3. 3. ed. Rio de Janeiro: Forense, 2019.

of the aforementioned law. This provision lists, strictly (therefore, in a limited and non-exhaustive way), the conducts that can be classified as a harmful act:

- To promise, offer or give, directly or indirectly, undue or pecuniary benefit to a public agent, or to a third person associated with him;
- Demonstrably, to finance, fund, sponsor, or in any way subsidize the practice of illicit acts foreseen in this Law;
- Demonstrably, to use a natural or legal person to hide or disguise one's real interests or the identity of the beneficiaries of the acts performed;
- To thwart or defraud, by means of adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
- To prevent, disrupt or defraud the performance of any act of public bidding procedure;
- To remove or seek to remove bidder, through fraud or offering benefit of any kind;
- To defraud public bidding or contract arising from it;
- To create, fraudulently or irregularly, a legal entity to participate in public bidding or enter into an administrative contract;
- To obtain undue or pecuniary benefit, fraudulently from modifications or extensions of contracts concluded with the public administration, with no authorization by law, in the act convening the public bidding or in the respective contractual instruments;
- To manipulate or defraud the economic and financial balance of contracts concluded along the public administration;
- To hinder the investigation or supervision of public agents, bodies or entities, or interfere in their performance, including within the scope of regulatory agencies and supervisory bodies of the national financial system.

In order to regulate Law 12.846/13, Decree 8.420 was published on March 18th, 2015, consolidating, along with ordinances and normative instructions, the application of important mechanisms of repression to illegal acts practiced against the Public Administration and formalizing the importance of adopting anti-corruption measures by private entities.

In addition to this decree, there are other relevant official regulations in this matter, such as Ordinances No. 9092 and No. 9103 of the then Office of the Federal Controller General, as well as normative instruction No. 1/2015. There are also several regulations in the state, district and municipal spheres, based on the competence of each of these entities.

² It also define criteria for evaluating the integrity programs of companies as a requirement for granting a reduction in the amount of the fine.

³ It is the most robust normative published by the CGU, its content details the procedures of the administrative accountability process and the leniency agreement.

5. DEFINITIONS

PUBLIC ADMINISTRATION: Basically, we can take Public Administration in two senses: The subjective (or formal), which designates the entities that exercise administrative activity (the set of legal entities, government bodies and agents responsible for exercising the administrative function) and the objective (or material) that designates the kind of the activity of these entities: the administrative function, which is the duty (predominantly) of the Executive Branch.

The Public Administration is divided into direct administration (Federal, State, Federal District and Municipal) and indirect administration (autonomous government agencies, public foundations, state-owned companies, private companies controlled by the government and any other organizations of administrative decentralization).

FOREIGN PUBLIC ADMINISTRATION⁴: State bodies and entities or diplomatic representations of a foreign country, of any government level or sphere, as well as legal entities controlled, directly or indirectly, by the country's government.

PUBLIC AGENT: Any individual who, in any capacity, by election, nomination, appointment or any form of investiture, holds public office, permanently or temporarily, providing services to the State (at bodies, state entities, diplomatic representations, foreign government, etc.) and to legal entities of Indirect Administration (autonomous government agencies, foundations and state-owned companies, etc.).

FOREIGN PUBLIC AGENT⁵: A person who, even when temporarily or permanently not receiving any remuneration, holds office, employment or public office at bodies, state entities or foreign diplomatic representations, as well as at legal entities controlled, directly or indirectly, by a foreign government or at international public organizations.

ITEM OF ANY KIND: Includes, but is not limited to, money or equivalent, gifts, travel, entertainment, meals, training, charitable and political contributions, job opportunity or consultancy, research support, education and health expenses.

CUSTOMER: Any individual or legal entity who hires EAH TRADING to carry out one of the activities provided for in the CNAE – National Classification for Economic Activities.

DECREE No. 3.678/00: Federal decree promulgating the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, signed in Paris on December 17th, 1997.

DECREE N. 5.687/06: Federal decree promulgating the United Nations Convention against Corruption, adopted by the United Nations General Assembly on October 31st, 2003 and signed by Brazil on December 9th, 2003.

MONEY LAUNDERING: Unlawful procedure used to disguise the origin of illegal resources. Law 9.613/98 (amended by Law 12.682/12) provides for the crimes of “laundering” or concealment of assets, rights and values; the prevention of the use of the financial system for the illicit acts

⁴ Definition established by Law 12.846 from 08/01/2013.

⁵ Definition established by Law 12.846 from 08/01/2013.

provided for in this law; creates the financial activities Control Council - COAF (Financial Control Council), and establishes other measures.

ANTI-CORRUPTION LAW No. 12.846/13: Law on objective administrative and civil accountability of legal entities for the practice of acts of corruption against national and foreign public administration, including acquisition and public procurement fraud. It was regulated by Federal Decree 8.420/15.

PUBLIC PROCUREMENT: Government procurement conducted by a public body that, in the exercise of its administrative function, opens to all interested parties the possibility of submitting proposals for the execution of a government contract, taking into account the conditions established by the notice instrument and the most suitable proposal. Law No. 8.666/1993, which regulates the bidding process, also points out that public procurements aim to select the most advantageous proposal for the Government, promote development and ensure equal protection of the laws among bidders.

PARTNERS OR THIRD PARTIES: In the context of the EAH TRADING, contracted third parties are considered business partners, whether they are individuals or legal entities, which act on their behalf, interest or benefit (such as consultants, contractors, distributor agents, dispatchers, intermediaries, service providers, etc.).

SUPPLIERS: In the context of the EAH TRADING, other third parties contractors and subcontractors are considered suppliers, whether they are individual or legal entities, not classified as commercial partners.

ORDINANCE No. 909/15 CGU: Office of the Federal Controller General ordinance that provides for the evaluation of integrity programs of legal entities.

ORDINANCE No. 910/15 CGU: Ordinance of the Office of the Federal Controller General that determines the procedures for the determination of administrative responsibility and for the execution of the leniency agreement that deals with Law 12.846/13.

INTEGRITY PROGRAM: It consists, within the scope of a legal entity, of a set of internal mechanisms and procedures of integrity, audit and incentive to the report of irregularities and of an effective application of codes of ethics and conduct, policies and directives in order to detect and remedy deviations, fraud, irregularities and unlawful acts practiced against the national or foreign public administration.

QUARANTINE: Period of isolation of public agents to avoid conflict of interest in the exercise of office or employment in the Federal Executive Branch and impediments subsequent to the exercise of office or employment; this matter is dealt with in Federal Law No. 12.813/13, which, however, does not exhaust the matter in the federal, state and municipal legislative branch.

UNFAIR OR PECUNIARY ADVANTAGE: Offering to a public agent or an individual or legal entity an item of any kind with the purpose of obtaining favoritism, advantages or facilitating the progress of negotiations, activities or operations and also obtaining confidential information.

6. BEHAVIORAL DIRECTIVES

Every recipient involved in each and any activities executed by EAH TRADING , or on its behalf, must

strictly observe the following directives:

- Adopt the principles and rules of conduct defined by the *EAH TRADING Code of Ethics and Conduct*. It should be noted that, the latter presents provisions on report channels and the Ethics Committee, which is the highest body for evaluation of violations of its principles (section “Ethics Management”). This *Policy* guarantees protection to anyone who comes to report a situation compatible with the acts of corruption or similar indicated therein;
- Repress the conduct of any recipient of this *Policy* – *customer, supplier, donor* or sponsor and others - who, when interacting with public agents or others on behalf of EAH TRADING , promises, authorizes, offers or grants, directly or indirectly, payment of items of any kind to a public agent or to any individual or legal entity aiming to obtain, on the scope of the contract, any unfair or pecuniary advantage for EAH TRADING , for themselves or for third parties;
- Condemn the conduct of any recipient of this *Policy* – *customer, supplier, donor* or sponsor and others - who, when interacting with public agents or others on behalf of EAH TRADING , request, demand, accept or receive, directly or indirectly, payment of items of any kind from any individual or legal entity aiming to obtain, on the scope of the contract, any unfair or pecuniary advantage for EAH TRADING , for themselves or for third parties;
- Report to the communication channels defined by the *EAH TRADING Code of Ethics and Conduct*, in a well-founded manner, violations of this *Policy* by any of the EAH TRADING relationship audiences that come to their knowledge;
- Act proactively so that, in the conduct of its activities, EAH TRADING can always make decisions based on probity, integrity and ethics by defining business factors such as quality, schedule, price and scope of an activity, honoring its tradition of excellence built over more than 70 years of existence. EAH TRADING then considers the following conduct to be unacceptable and prohibited:
 - Any form of corruption, extortion or fraud;
 - Any practice of embezzlement, smuggling, forgery, criminal misrepresentation, tax evasion or any other unfair and unlawful practices;
 - Any form of unlawful incentive, such as offering and accepting bribes and bribery;
 - Corporate espionage and other unfair and anticompetitive practices;
 - Forgery of documents, reports, financial records and structuring of transactions in order to circumvent approval processes and other internal controls.

7. SCOPE OF THE EAH TRADING INTEGRITY PROGRAM

7.3. CONTROL ENVIRONMENT

7.3.1. COMMITMENT AND SUPPORT OF EAH TRADING TOP MANAGEMENT

Top management refers to EAH TRADING 's shareholding structure.

Such structure must permanently implement, in the management of the institution, the dissemination of ethics and integrity, bringing the example of and approaching the topic during the meetings at all levels, as well as adopting and disseminating the *EAH TRADING Code of Ethics and the Conduct*, which contains the rules of conduct to be complied with and the present *Anti-Corruption Policy*.

7.3.2. BODY RESPONSIBLE FOR THE INTEGRITY PROGRAM

The development, application and monitoring of the *EAH TRADING Integrity Program* is the responsibility of the *Top Management* alongside the *Quality Department*, which has:

- Autonomy to make decisions and implement required actions;
- Competence to appoint necessary alterations;
- Potential to suggest to the Top Management adequate amendments mitigate risks regarding corruption or any other form of impediment to the achievement of EAH TRADING ' purposes;
- Guarantees that evidence of irregularity will be effectively ascertained.

7.4. RISK EVALUATION

The main goals of the *EAH TRADING Internal Control and Compliance System* are to identify and further the evaluation of risks that may compromise the achievement of the institution's goals, the creation of policies to mitigate risks as well as the periodic monitoring of the effectiveness of the controls.

Specifically, the *EAH TRADING Integrity Program* deals with the risk of non-compliance with the anti-corruption laws mentioned in this *Policy*, arising from situations that allow harmful acts such as the offering of unfair or pecuniary advantage to public agents, or even to any individual or legal entity, as well as the occurrence of fraud in procurements and contracts.

Thus, as provided for in the EAH TRADING Internal Control and Compliance System, the management of these risks involves three aspects linked to the analysis and evaluation of risks and which are independent of the nature of the related parties:

- The mapping of situations or risk factors that may facilitate, camouflage or contribute to the practice of harmful acts against the national or foreign public administration, provided for in the legislation in force;
- The creation of policies or the reinforcement of existing ones with the objective of increasing control over risk situations or factors related to the occurrence of harmful acts, reducing the chances of their occurrence or the association of EAH TRADING to customers, suppliers, donors, sponsors or commercial partners with any type of involvement;

- Continuous evaluation of scenarios to assess whether the alterations do not require new directives and measures.

7.4.1. WARNING SIGNS

All recipients of this *Policy*, involved in the execution of EAH TRADING' activities, shall, in advance to the conclusion of a relationship or to any time during its effectiveness, be aware of the following risk factors that may represent facilitation or suggest the practice of the harmful acts provided for by the legislation in force and, specifically, by Law 12.846/13:

- Activities involving countries whose laws do not objectively condemn similar acts of corruption or similar violations;
- Activities involving locations known as tax havens;
- Any kind of payment or receipt made in cash;
- Unspecified and subjective descriptions of income and expenses that create difficulties relating to the identification of the origin and destination of the amounts involved;
- Operations in which there is no clarity as to the purpose and of very complex and unusual structure;
- Companies that have undergone a process of merger, acquisition and corporate restructuring;
- Proposal of monetary value referring to the compensation of an activity above the budget estimate to achieve the objective of the contract;
- Successive requests for alterations in scope with consequent mischaracterization of the object and initial objective of the possible contracting;
- In the contracting process, proposal of payments and receipts in locations very different from the one in which the activity will be developed or that present some type of unusual gathering;
- Lack of proof of administrative and corporate control of the contracting or contractor parties and of their responsibilities;
- Restrictions on the part of the customer, supplier, donor or sponsor regarding the participation of more than one EAH TRADING representative (recipient of this Policy) in meetings or other types of contact which may characterize an aim for a private contact and thus facilitate an offer of undue or pecuniary advantage and/or fraud;
- Customer, supplier, donor or sponsor representative with a history of any kind of violations of the law;
- Insistence on contracting or recommending, by anyone involved in the activity or responsible for it, people with employment relationship or business partners without the knowledge and skills adequate to the needs of the developing activity;
- Newly constituted customers, suppliers, donors, sponsors or business partners with no track record or formed for the sole purpose of participating in the developing activity;

- Existence of relationship between the parties involved in an activity when the relationship must be carefully evaluated in order to ensure that there is no conflict of interest;
- Resistance to the signing of the terms of adherence provided for in this policy which, in turn, aims to prove the degree of adherence of the signatory to compliance with the applicable anti-corruption legislation.

7.5. CONTROL DIRECTIVES

It is up to the recipients of this *Policy* to strictly obey the following verifications, indicated in order to avoid the risk of non-compliance with the applicable legislation against bribery and corruption and specifically to Law 12.846/13:

7.5.1. RELATIONSHIP WITH THE PUBLIC SECTOR

7.5.1.1. HIRING BY THE PUBLIC ADMINISTRATION *

EAH TRADING does not allow anyone on its behalf to take advantage in contracting with the public administration

Those responsible for activities associated with this type of hiring in EAH TRADING must ensure that no offer or receipt of undue or pecuniary advantage occurs, taking care that all negotiations are always carried out in the presence of more than one representative of EAH TRADING and more than one public agent.

In addition, the evaluation of public contracts must go through the Top Management of EAH TRADING or by whom it appoints.

7.5.1.2. OBTAINING LICENSES, AUTHORIZATIONS AND PERMITS.

EAH TRADING does not authorize, on its behalf, the offer of any kind of undue advantage to public agents in order to hasten or enable to obtain licenses, authorizations and permits

Those responsible for obtaining licenses, authorizations and permits in EAH TRADING must ensure that no offer or receipt of undue or pecuniary advantage occurs, and care must also be taken to ensure that all negotiations are always carried out in the presence of more than one representative of EAH TRADING and more than one public agent.

7.5.1.3. FACILITATION PAYMENTS

Notwithstanding the hypotheses in which there is *legality* in facilitation payments, these are prohibited under many anti-corruption laws and they are at great risk of being configured as an undue or pecuniary advantage to the Public Agent to expedite or guarantee a certain administrative situation.

7.5.1.4. OCCASIONAL INSPECTIONS

Occasional inspections that EAH TRADING may undergo must be accompanied directly by the legal officer of the unit involved in the activity under investigation and reported, for as long as they last, to the Top Management of EAH.

Under no circumstances must the actions of the inspectors be hindered, undue or pecuniary advantages be taken, or requests be granted with the aim of influencing the results.

7.5.1.5. HIRING OF AGENTS AND FORMER PUBLIC AGENTS

The hiring of public agents or former public agents is described, within the EAH TRADING scope, in a specific Procedure Rule, and it is up to the Human Resources Board to forward the appropriate diligences in each of the cases that arise, always aware of the need to avoid any type of undue or pecuniary advantage, directly or indirectly.

Likewise, it is the Human Resources Board that directs the re-training of employees who temporarily exercised activity in the public administration, taking care to respect the “quarantine” periods mentioned in Law n° 12.813/13, as well as the specific ones that may eventually have been defined in the face of that public agent.

Employees will assume the position after the opinion and approval of the Top Management.

7.5.2. RELATIONSHIP WITH BUSINESS PARTNERS, SUPPLIERS, DONORS, SPONSORS OR CUSTOMERS

Law 12.846/13 provides in its Chapter I on the objective liability of legal entities for practicing acts against the national or foreign public administration and also those that on their behalf operate, whose harmful acts provided for in the law include those practiced in the interest of the legal entity or for its benefit, exclusive or not.

Although the legal entity is held independently of the individual liability of natural persons, this does not exclude the individual liability of its directors, managers, or any other natural person who is a perpetrator, co-author, or participant in the unlawful act.

The possibility for EAH TRADING to be held responsible for the actions of third parties hired to act as its business partner or supplier implies the need to obtain minimal and sufficient information about these business partners or suppliers that make it possible to assess their integrity and conduct. This information is available in the EAH TRADING database.

Particular attention should be paid to possible corporate, administrative and family ties between the customer, donor, sponsor, supplier or the business partner with a public agent. In any situation, the possibility of an undue or pecuniary advantage, or even a conflict of interest, must be ruled out.

All contracts entered into with customers, donors, sponsors, suppliers or business partners have clauses that attest to the existence of practices and controls that prohibit acts of corruption and money laundering, as well as the third party's commitment to comply with anti-corruption laws.

In addition to the verifications mentioned above, it should be remembered that all customers, donors, sponsors or suppliers of EAH TRADING must sign the term of acceptance of the EAH TRADING Ethics and Conduct Code.

7.5.3. GIVEAWAYS, GIFTS, ENTERTAINMENT AND HOSPITALITY

With regard especially to the exchange of giveaways, gifts, entertainment and hospitality with public agents, the EAH TRADING faithfully complies with the governing legislation of the body to which the professional is bound and repudiates all relations aimed at undue or pecuniary advantage.

Any person acting on behalf of EAH TRADING , any promises, offers or provision and any type of entertainment or hospitality benefit, especially directed to public agents such as Government authorities and related, is prohibited.

7.5.4. CONTRIBUTIONS, SPONSORSHIPS AND DONATIONS

Any contribution, sponsorship and donation, as well as other offers of a similar type, can only be accepted on behalf of EAH TRADING after evaluation and prior approval of the Top Management, aiming to assess any unlawful or risk factor in the offer. The receipt of contributions, sponsorships and donations within the scope of EAH TRADING is described in a specific Standard of Procedures.

Regarding this *Policy*, it should be reinforced that under no circumstances can contributions, sponsorships and donations be accepted in exchange for favors, advantages or conditions, both from public and private companies, whether national or foreign.

Contributions, sponsorships and donations received will be accounted for in accordance with accepted accounting principles, current legislation and their documented use in order to show the application for what they were intended.

Offers of contributions, sponsorships and donations will attest to their care relating the control of unlawful acts through the Integrity Program Verification Term attached to this Policy.

7.5.5. RECEIVING UNDUE ADVANTAGES

No person, on behalf of EAH TRADING , may suggest, request or accept payment in the form of undue or pecuniary advantage, by way of inducing oneself to provide undue information, act or decision improper to probity and the company.

Except for corporate courtesies within the law and in accordance with applicable law, no items such as cash, items of value, services, discounts or other benefits may be received.

7.5.6. COMMERCIAL BRIBERY

It is prohibited for any *recipient* of this *Policy* to offer payment in cash, services, goods or other form of commercial bribery, to a supplier, customer or third party for the purpose of obtaining advantage – of a commercial nature – improper by the other party.

7.5.7. POLITICAL CONTRIBUTIONS

All *recipients* of this *Policy* may make personal contributions to parties or politicians, but are not authorized to relate such contributions to the name of EAH TRADING .

7.5.8. CONFLICTS OF INTEREST

EAH TRADING requires all recipients of this *Policy* to be attentive and avoid any interaction with public agents that may be identified by conflict of interest, those situations characterized by the impossibility of attesting impartiality in judgments and decisions or some kind of undue or pecuniary advantage.

In any situation where there are doubts about the presence of conflicts, the channel indicated in the EAH TRADING Ethics and Conduct Code must be used.

7.5.9. COMMITMENT TO ETHICS AND INTEGRITY IN GOAL MANAGEMENT

Through this *Policy*, EAH TRADING reinforces its commitment to setting challenging goals, but rejecting the conduct of obtaining results at any cost by any recipient of this *Policy*.

It is up to the recipients to ensure that the name of EAH TRADING does not end up being linked to unprofessional or corrupt positions, characterized when only the results were aimed and not the maintenance of an ethical and integral relationship in the development of activities.

All recipients of this *Policy* must know and adhere to the principles and criteria of conduct established in the EAH TRADING Ethics and Conduct Code.

7.5.10. MONEY LAUNDERING

EAH TRADING requires all recipients of this *Policy* to follow the following rules:

- Make payments for legitimate and legally authorized business purposes arising from original business reasons;
- Ensure that the object and purpose of hiring are not likely to be used for unlawful practices;
- Reject any *undue or pecuniary advantage* or payment, for any reason, that is intended to execute, maintain or secure a business relationship with or for EAH TRADING ;
- Make records that accurately reflect all expenses on behalf of EAH TRADING , and it is forbidden to conceal or modify information, as well as to make payments without approval and relevant documentation.

7.6. INFORMATION AND COMMUNICATION

All recipients of this *Policy* have the responsibility to communicate the fact to the Top Management and to the EAH TRADING Quality Department when identifying a risk situation related to the Anti-Corruption Law and other standards of similar content.

For this purpose, the communication channels disclosed in the *EAH TRADING Ethics and Conduct Code* may be used.

No person who comes to report a fact or suspicion related to the offenses contained in Law 12.486/13 should feel persecuted or suffer any kind of retaliation. Any violation shall be conducted through Top Management and by the EAH TRADING Quality Department and disciplinary measures shall be proportional to the severity of the violation.

In order to publicize the content of this Policy and qualify its target audience, EAH TRADING has regular training initiatives. All those who participate in the trainings shall receive, by action of the Human Resources Board, a certificate of participation.

Training activities shall be carried out by the Human Resources Board after approval by the Top Management.

7.7. MONITORING

The *EAH TRADING Integrity Program* must reach all recipients of this *Policy* in its various activities. Thus, the Top Management together with the Quality department will maintain minimum scope and monitoring checks as described in the *CGU Ordinance N° 909/15*.

In addition to the constant updating of this *Policy*, it is the responsibility of the Top Management, together with the Quality department, to monitor, with the EAH TRADING managers, potential faults in the various EAH TRADING processes that may lead to the practice of unlawful acts or facilitate the risk of their occurrence, especially the processes that give basis to the hiring of EAH TRADING to carry out the various activities linked to public agents.

All suspicious or concrete situations of corruption, disseminated through the media, should be used to endorse and renew the caution taken while handling EAH TRADING processes, as well as, and especially, the reports made internally by any recipients of this *Policy*.

8. SITUATIONS NOT COVERED

This Policy presents general directives, and some specific situations may not be covered.

What is expected in these cases is that each one acts with responsibility, prudence and ethical conscience, evaluating the best way forward with the certainty that the appropriate solution will always be governed by the values we cherish.

Any questions not specified in this document and related to the topics ethics and conduct, should be submitted for evaluation by the Executive Board.

It is the responsibility of the Human Resources Department to keep this document up to date, in accordance with the one published by the group internationally, making its content known to all in the EAH TRADING .

9. TERM

This Policy enters into force on the date of its publication, revoking and replacing any previous communication on the matter and will remain in effect for an indefinite period.

Document	EAH TRADING Anti-Corruption Policy
Matter category	Control and Compliance

ANNEX I

TERM COMMITMENT TO THE ANTI-CORRUPTION POLICY

I hereby declare, for all purposes, that I have received a copy of the EAH TRADING Anti-Corruption Policy, which was in clear and easy-to-understand language, so that I assume that I am aware of my responsibility and commit to comply with it and fully respect it.

I also declare that I am aware of compliance in all situations and circumstances that are directly or indirectly linked to my activities at EAH TRADING.

In the same way, I am aware that failure to comply with any of the terms provided for in this Anti-Corruption Policy will lead to the formation of an administrative inquiry, which will be constituted to investigate any irregularities.

Continuous act, in view of the finding of irregularities, I hereby declare that I am aware that EAH TRADING may take the appropriate measures, both in the administrative and judicial fields, aimed at repairing all damages caused, whether in the criminal, civil or labor spheres..

I further hereby declare that if I identify a risk situation related to the Anti-Corruption Law or a situation in which the conduct required or expected by this Policy has not been expressly followed, I will report such facts to the EAH TRADING Top Management.

Finally, in witness whereof, I hereby sign the present instrument.

Place and Date	
Full name	
CPF	
Signature	

ANNEX II

INTEGRITY PROGRAM VERIFICATION TERM

Company name:
CNPJ:

EAH TRADING seeks to maintain with its customers, business partners, suppliers, donors or sponsors a standard of relationship based on integrity, sharing of ethical values and compliance with applicable laws and standards. Therefore, we would like to invite you to share with us your anti-corruption practices.

We present below a minimum set of assertions for whose reflections it will be necessary for you to become aware of the determinations provided for in the following federal laws.

- Law No. 12.846/13 – Anti-Corruption Law
- Decree No. 8.420/15, according to which an Integrity Program within the scope of a legal entity consists of:

"Set of internal mechanisms and procedures of integrity, audit and incentive to report irregularities and the effective application of codes of ethics and conduct, policies and directives in order to detect and remedy deviations, fraud, irregularities and unlawful acts practiced against public administration, national or foreign"

Before beginning to verify the compliance of your managing practices with the assertions, we'd like to ask you: What is the share of contracts with *public administration* - national and foreign - in your operating revenue?

_____ % for national public administration

_____ % for foreign public administration

Section 1 - Control environment

1) We have a Code of Ethics and Conduct, or similar document, known throughout the organization and disseminated from the top management (board of directors or higher hierarchical level in the absence of this).		
() Yes	() No	() Other
Other (specify):		

2) Our Code of Ethics and Conduct clearly addresses anti-corruption principles.		
☐ Yes	☐ No	☐ Other
Other (specify):		

3) We have an Integrity Program in the terms defined by the federal standards mentioned in the head provision of this document.		
☐ Yes	☐ No	☐ Other
Other (specify):		

4) In addition to the Code of Ethics and Conduct, we have an Anti-Corruption Policy that identifies corruption practices and defines preventive, detection and correction actions in a timely manner.		
☐ Yes	☐ No	☐ Other
Other (specify):		

5) Our employees and business partners (third-party contractors acting on our behalf) sign an agreement to adhere to the Code of Ethics and Conduct and/or a declaration of the acknowledgment of the Anti-Corruption Policy.		
☐ Yes	☐ No	☐ Other
Other (specify):		

6) We have widely publicized channels to receive reports of corruption-related actions, including anonymously, and we guarantee that there will be no retaliation against the complainer.		
☐ Yes	☐ No	☐ Other
Other (specify):		

7) We have a responsible area, and administratively independent of the others, to standardize and disseminate anti-corruption practices within an Integrity Program.		
☐ Yes	☐ No	☐ Other
Other (specify):		

8) The responsible area is subordinate to the top management and is responsible for the compliance program of the company and the entire economic group (subsidiaries, affiliates, branches), if applicable		
☐ Yes	☐ No	☐ Other
Other (specify):		

9) We have an Ethics Committee or a similar instance, also independent, to evaluate the suspicions of corruption that come through the communication channels or other means.		
☐ Yes	☐ No	☐ Other
Other (specify):		

Section 2 - Risk Evaluation

1) We have clearly identified the risks (vulnerabilities) to acts of corruption to which the company is subject.		
☐ Yes	☐ No	☐ Other
Other (specify):		

2) We often map our processes seeking to identify new vulnerabilities and improvements in controls, including using reports as a starting point.		
☐ Yes	☐ No	☐ Other
Other (specify):		

3) We have never been investigated, prosecuted, punished, or assessed by a competent authority for involvement in corruption.		
☐ Yes	☐ No	☐ Other
Other (specify):		

Section 3 - Control activities

Note: The risks inherent to each of the following activities were identified and sufficient controls were implemented to mitigate them.

1) We work hard to ensure that the participation in biddings meets all the requirements defined by the rules that guide them (Law 8.666/93 and Law 12.846/13), as well as the specific edict.

☐ Yes

☐ No

☐ Other or not applicable

Other or not applicable (specify):

2) We work hard to ensure that obtaining licenses, authorizations, and permits is never expedited by an employee or business partner offering some kind of advantage to a public official.

☐ Yes

☐ No

☐ Other or not applicable

Other or not applicable (specify):

3) We seek to maintain total transparency in contacts with public officials in any inspections not causing them any kind of embarrassment.

☐ Yes

☐ No

☐ Other or not applicable

Other or not applicable (specify):

4) In the hiring of former public agents we strictly follow the laws that determine the quarantine period between their disconnection and their entry into the staff of the company, also making sure that the functions they will develop do not represent the possibility of future facilitations or privileges.

☐ Yes

☐ No

☐ Other or not applicable

Other or not applicable (specify):

5) We work hard to ensure that no gifts, presents, entertainment, or hospitalities are ever exchanged between the company and public agents with the objective of obtaining any undue advantage.

☐ Yes

☐ No

☐ Other or not applicable

Other or not applicable (specify):

6) Prior to hiring suppliers and business partners (third-party contractors acting on our behalf) we conduct prior evaluations of the professional or their employer attesting to their adherence to the standards that guide our Integrity Program.		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

7) We apply in our Integrity Program a careful evaluation of our clients, seeking to dimension possible participations or risks of involvement with acts of corruption or conflicts of interest.		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

8) When offering contributions, sponsorships and donations, we carry out prior evaluation of the one who will be the beneficiary of the action in order to certify their trustworthiness or conflicts of interest.		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

9) We have procedures that guarantee reasoned evaluations and judgments of situations that characterize conflicts of interest for the benefit of the company itself or others related to it.		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

10) We keep up to date the register of our partners, directors and advisers, in order to identify potential conflicts of interest depending on their relationship with public agents, government entities or any other party related to an activity.		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

11) When setting goals for employees, we make it clear that we do not tolerate results obtained from illegal activities or any type of benefit framed in Law 12.846/13.		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

12) We have prior analytical procedures to detect possible involvement with money laundering (legitimizing resources of dubious origin).		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

13) We work hard to ensure that all revenues and expenses receive the appropriate accounting records, as well as the necessary justification for the perfect identification of their origin.		
☐ Yes	☐ No	☐ Other or not applicable
Other or not applicable (specify):		

We work hard to ensure that all revenue and expenses receive the appropriate accounting records, as well as the necessary justification for the perfect identification of their origin.

