

ANTI-CORRUPTION POLICY





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1. OBJECTIVE

Reinforce Dynamox's commitment to maintaining standards of integrity, ethics, and governance in the way it conducts its business by establishing anti-corruption guidelines in relation to both public institutions and private companies. This aims to ensure that all Dynamox employees, partners and suppliers are clear on the guidelines of the Brazilian Anti-Corruption Law (No. 12.846/13 and its Decree No. 8.420/15) so that everyone observes the guidelines to prevent and combat situations prone to acts of corruption, bribery, and fraud.

2. APPLICATION

It applies to all Dynamox's direct or outsourced workforce, in line with Brazilian legislation, as well as the legislation of any country where the organization has business, operates, or will operate, or assumes business connections with citizens of the origin of the Law ("Anti-Corruption Laws").

3. GENERAL PROVISIONS

Prohibition of bribery and corruption: Dynamox does not tolerate bribery or corruption in any form or degree. The company will not make any payments or offer anything of value to gain undue advantage or influence decisions. Dynamox's employees may also not accept bribes or undue advantages from third parties.

Compliance: Dynamox will conduct its operations in compliance with the laws and regulations applicable in all jurisdictions in which it operates. The company's employees are required to comply with company policies and procedures, as well as all applicable laws and regulations related to the prevention of bribery and corruption.

Training: Dynamox will provide regular training to employees on anti-corruption laws and regulations and their individual responsibilities to ensure that the policy is understood and applied correctly. The training will also help employees to recognize and report possible cases of corruption.

Monitoring: Dynamox will carry out regular audits to ensure that this policy is being implemented and that there is no inappropriate or illegal behavior occurring within the company. Any suspicion of corruption or unethical behavior will be investigated, and appropriate action will be taken.

Complaints channel: Dynamox provides a confidential complaints channel (available at the link BeCompliance - Ethics Channel) so that employees, customers, suppliers and third parties can report cases of corruption or unethical behavior without fear of retaliation. Dynamox will not allow any employee to suffer retaliation for reporting violations of this policy.

Commitment to transparency: Dynamox is committed to providing accurate and transparent information about its operations and actions to ensure that all stakeholders are aware of its anti-corruption policies and practices. Dynamox also encourages collaboration with government authorities, when necessary, to promote transparency and integrity in the business environment.

Sanctions: Violation of this policy may result in disciplinary action, including termination of employment, as well as legal action and the civil or criminal liability of the individuals involved. Dynamox reserves the right to take all necessary steps to protect its interests and preserve its reputation.