



## ANTI-CORRUPTION POLICY

The purpose of the Anti-Corruption Policy is to reinforce Dynamox's commitment in maintaining the standards of integrity, ethics and governance in conducting 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 have clear guidelines of the Brazilian Anti-Corruption Law (No. 12.846/13 and its Decree No. 8.420/15), the Foreign Corrupt Practices Act (15 U.S.C.§78-dd-1, et seq., as amended) so that everyone observes the guidelines for preventing and combating situations prone to corruption, bribery and fraud acts.

It applies to the entire direct or outsourced workforce of Dynamox, in accordance with Brazilian law, and the legislation of any country where the organization has business, operates or will operate, or takes commercial links with citizens of the origin of the Law ("Anti-Corruption Laws").

### **ASSUMED PATTERNS OF BEHAVIOR**

#### **CONFLICT OF INTERESTS**

It is the duty of employees to inform the leadership about any personal interest that may be incompatible with the performance of their professional duties.

#### **ACCOUNTING RECORDS**

Dynamox is required by law to have and maintain records and accounts reflecting in a detailed, precise and correct way its operations and asset disposals. Transactions must be transparent, documented and intended for accounts that accurately and completely reflect their nature. The use of false documents and invoices is prohibited, as well as the carrying out of inappropriate, ambiguous or fraudulent accounting entries, and any other accounting procedure, technique or artifice that may conceal or otherwise mask illegal payments.

#### **INFLUENCE PEDDLING**

All information of the organization not disclosed or not known in the market in which it operates, is considered strategic and confidential and, although they may be accessible to employees, they must be preserved from naive or bad faith disclosure.

#### **DONATIONS AND SPONSORSHIPS**

Donation and sponsorship contributions will be made with the highest standard of transparency, integrity and legality. Donations and sponsorships are forbidden to be offered, promised or granted for the purpose of obtaining an inadequate advantage or influencing the action of a public agent.

## **RELATIONSHIP WITH SUPPLIERS, PARTNERS AND THIRD PARTIES**

All suppliers, service providers, intermediaries and other partners conducting business with or on behalf of Dynamox, must act with the highest level of integrity. Thus, the company reserves the right to carry out an assessment of compliance risks through an integrity due diligence procedure that aims to know and assess the integrity risks to which it may be exposed, in its relationships with third parties.

## **FACILITATION PAYMENT**

“Facilitation payments” are payments made to employees in both the public and private sectors, as a personal benefit, to guarantee or speed up the execution of routine acts to which the company is entitled. Dynamox prohibits and does not tolerate the offer of facilitation payment to speed up or favor the analysis and obtaining of licenses, authorizations and permissions to be carried out by its employees, suppliers or intermediaries.

## **PARTICIPATION IN PUBLIC BIDDING**

Dynamox repudiates and punishes any participation in fraud or that goes against the precepts of Law 12.846:2013, specifically with regard to the item of Article 5 of the referred Law. If it comes to participate in public biddings, it will be subject to and comply with the legal provisions of the Bidding Law (No. 8.666/13), the Anti-Corruption Law, the bidding rules and contractual clauses signed with the public bidding agency.

## **GIFTS**

All employees (Own and Third Parties) who act on behalf of Dynamox are prohibited from receiving, offering, promising, making, authorizing or providing (directly or indirectly) any improper advantage, payments, gifts or the transfer of any valuable item to any person, whether Public Agent or not, to influence or reward any official action or decision of such person for the benefit of Dynamox.

## **MERGERS, ACQUISITIONS AND CORPORATE RESTRUCTURING**

If Dynamox intends to merge, acquire or undertake corporate restructuring, it must perform a Due Diligence of integrity in the target company before the conclusion of the business closing process.

## **POLITICAL CONTRIBUTIONS**

Dynamox prohibits the use of Company resources or assets, whether in cash or otherwise, for contributions to political parties or candidates for public office, in accordance with the Brazilian legislation.

## **COMMUNICATION AND TRAINING**

Dynamox will maintain a periodic and constant communication and training plan for its employees in order to disseminate and raise awareness of the importance of complying with the rules of this Policy. It is the responsibility of all Dynamox managers to disclose the content of this Policy to their teams and to make them aware of the need and importance of its observance and to encourage them to raise questions or concerns regarding its application. Any situations, exceptions and/or clarifications on the application of this Policy may be referred to the Board or HR.

## **CONFIDENTIAL CHANNEL**

It is essential that everyone covered by this Policy reports any act or indication of an act of corruption, payment/receipt of kickbacks or any other situation that violates this Anti-Corruption Policy, ensuring the protection of the ethical standards adopted by Dynamox and preserving its image in the market.

Email: denuncia@dynamox.net

Conventional telephone: 55-48-3025-5858 - Extension (303).

## **RESPONSIBILITIES**

Dynamox employees are responsible for complying with all the provisions of this Anti-Corruption Policy and ensuring that all third parties and partners in its relationship are informed about its content. Adherence is mandatory for all employees and must be done by signing the Term of Commitment to the Anti-Corruption Policy.

## **DISCIPLINARY SANCTIONS AND MEASURES**

Dynamox considers any violation of the rules and guidelines of this Policy, as well as of the content of the Anti-Corruption Laws, as serious fault. Any Party that practices fraud, acts of corruption or that violates any provision of this Policy or the Anti-Corruption Laws will be subject to disciplinary sanctions, which may include dismissal with cause or motivated contract termination. In addition, violation of the Anti-Corruption Laws can result in civil and criminal penalties.