

Policy on Compliance with Ethical, Integrity and Transparent Acting of the CRB

Revision Date Remarks

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01	08/2021	Items 1.2 and 7.3 – Adjustment – definition of CARC responsibilities.
02	01/2023	Item 2 of Annex I – Adjustment – responsibility of the Board of CRB to approve alterations and creations of Normative Instructions.

Records

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Área de Compliance
Elaboração

R-Compliance, T.I. e Diretoria
Análise Crítica

Conselho de Administração
Aprovação

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1. FUNDAMENTALS

THE definition and The Communication in Policies elapse in one of responsibilities primordial of Advice in Administration of concessionaire Route of Flags SA (“CA-CRB”).

The purpose of this policy is to establish guidelines for CRB members in relation to the company's standards of ethics and integrity, to guarantee compliance with the Law Anti-corruption Brazilian 12,846, and too much legislations anti-corruption applicable The CRB, such like The north law American FCPA.

Integrity is a legal obligation related to the Brazilian Anti-Corruption Law, as well as the laws FCPA From States United, The which if apply The CRB per have how shareholders, direct or indirectly, company subject The regulation in market through gives Commission in Values furniture (“CVM) and Securities and exchange Commission (“SEC”), what has laws, rules and regulations what forbid strictly The CRB in Act in manner corrupt or fraudulent in any locality Where you have operation.

The rules described in this standard serve as a tool to prevent corruption and guidance to the CRB members at the recognition in anomalies, avoiding conflicts and violations in ethic and integrity business. O greeting of rules on here described It's essential for O combat The fraud and The corruption, and he must to be observed per all you members gives CRB, independent in hierarchical level.

CRB members have an obligation to know, apply and disseminate the guidelines on here described. Whenever there is any doubt related to issues of ethics and integrity, CRB members have an obligation to seek guidance from their immediate superiors or with O R-Compliance.

Violations of this policy must be reported to immediate superiors and R-Compliance. THE failure or omission to comply with the guidelines set forth in this policy may result in serious penalties for the CRB and its members, including administrative actions (such as example dismissal, warning, etc.), civil and even criminal cases against individuals directly involved or indirectly with fraud or corruption.

O commitment assumed in this Policy he must to be practiced in form convinced, responsible and unrestricted at CRB, without exceptions nor flexibility.

This one commitment it is synthetized in the nine items below:

- Combat and not tolerate Corruption in any of its forms, including Extortion and Bribery.
- To say not, with firmness and determination, The opportunities in business what conflict with This one Commitment.
- To adopt Principles ethical, upright and transparent at the relationship with agents public and private.
- Never summon up conditions cultural or usual in market like justification for actions undue
- To secure transparency in the information on The CRB, what should to be accurate, comprehensive and affordable and published on a regular basis.
- To have consciousness in what deviations in conduct, be per share, omission or

complacency, attack the society, hurt at laws and destroy the image of CRB.

- Ensure at CRB, and at your chain in value, The practice of System in compliance, ever updated with at best references.
- Contribute individual and collectively for changes needed us markets and us environments Where there may be induction to deviations from conduct.
- Incorporate us Software in Action From Members evaluation in performance at the fulfillment of System of Compliance.

2. BASIC CONCEPTS

ethic – Science what have per object O judgment in appreciation, While This one if apply The distinction in between O well and O bad.¹

Integrity – Character, quality of a person full, honest, incorruptible, whose acts and attitudes are blameless; honesty, uprightness.²

Transparency – Conducting business without agendas hidden, and disclosure and availability regular in information accurate and comprehensive for at parts interested.³

Ethical behavior with integrity and transparency is essential for Growth and continuity from CRB.

The principles described here are intended to guide behavior and at relations internal and external From Members gives CRB, regardless of your attributions and responsibilities, together and in an integrated manner with the other Policies of the CRB.

In the practice of this Policy, the Principles of Trust in Human Beings stand out, in their potential and willingness to develop, Decentralization, Planned Delegation, Partnership It's from paper of manager like educator of their Leaders.

It is also noteworthy that Communication at CRB essentially takes place in the relationship between Manager and Led, to long of Cycle in Planning and Covenant of Program in Action, and your Follow-up, Evaluation and Judgment.

Managers at CRB must, through their attitudes and behavior, and through the practice of this Policy, to demonstrate, internal and externally, what they are convinced and committed with acting ethic, fully and transparently, including as a way of inspiring and influencing the conduct of its Led and the others Members of CRB.

Each Manager must incorporate into their Action Program, and ensure that it is in the Action of its Leaders, the commitment to act ethically, with integrity and transparency, in accordance with the provisions of this Policy, as well as, when applicable to the program, include initiatives related to

¹ Lalande, Andre – Vocabulary technical and Critical in Philosophy

² Based in Ferreira, Aurelius buarque in Netherlands – Young Aurelius

³ Based at "Transparency International"

Enhancement of System in Compliance.

All you Members gives CRB should to have O commitment in Act with ethic, integrity and transparency, in Compliance with the good ones governance practices and with the laws applicable.

Additionally, you Members gives CRB should to transmit at guidelines of this Policy, for what are known by Customers, suppliers and business partners in their value chain, too much parts interested and in the communities Where act.

3. COMPLIANCE SYSTEM



The Compliance System supports Team Members with a view to effective compliance between the commitment and the acting ethics, integrity and transparent.

It consists in a set in measurements for to prevent, to detect and to remedy scratches not befitting acting ethically, with integrity and transparency. The Compliance System must be implemented by the DP/CRB, within its scope of action, in line with the CRB *Compliance* Committee and with the R- Compliance.

THE practice of System in Compliance It's responsibility in all, especially From Managers and must take place within the framework of the Action Program's Planning and Agreement Cycle, and its Follow-up, Evaluation and Judgment, that permeates through the CRB.

Prevention is always better and less expensive than cure. Therefore, preventive measures are at most important in be implanted and followed, and for at which are should to be Priority is given to the attention of Managers, investments and other resources gives CRB.

However, no matter how good the preventive measures are, they may be insufficient. to ensure that the CRB is not exposed to risks of non-compliance with an action ethic, full and transparent, is that these risks if materialize.

Therefore, to guarantee the effectiveness of the Compliance System, it is essential that also implanted measurements in detection and in remediation. One turn detected one exhibitionat risk, it must be treated according to its nature and according to tolerance for the type of risk, defined by responsible for subject matter.

In the event of a non-compliance, measures to remedy the risks and strengthen measurements preventive and in detection should to be adopted, and, The to depend gives your nature, should to be also

adopted at appropriate disciplinary measures.

4. GOVERNANCE

THE acting of CA-CRB at the what if refers The it is Policy, have like focus to maintenance of unity philosophical and conceptual and O zeal for your effective application.

CRB has its own Board of Directors and a Chief Executive Officer responsible for your full entrepreneurship and act and m alignment with you Principles gives ethic, integrity and transparency inside of the Company.

Compete to Principal President gives CRB:

- promote The implementation of this Policy at CRB; and
- report to CA-CRB The Implementation of this Policy at CRB, well like you facts relevant arising of your practice.

5. IMPLEMENTATION AND PRACTICE

6. COMMUNICATION AND TRAINING

This Policy, in its entirety, must be accessible to all Members of the CRB, shareholders, stakeholders and society in general.

Additionally, more synthetic versions should be made available that favor their full Communication, well as modules and Software educational in support:

- To the Managers for full understanding gives Policy for your training like educators From Members of your teams, with O same purpose;
- to Members with specific assignments that require learnings specialized on certain topics gives Policy; and
- The all you Members for to secure O knowledge, and for promote O commitment with O Commitment to Performance Ethic, full and Transparent.

7. SPECIFIC GUIDELINES

In the Guidelines specific for The Implementation and practice of this Policy at CRB are addressed:

- at the Attachment 1, each a From elements what make up a System in Compliance and presented The governance necessary for its implantation and effectiveness.
- at the Attachment two, you themes and at circumstances found by the Members at the development From their Software in Action and at guidelines what should to be adopted for to prevent, to detect and to remedy scratches in acting what not be in conformity with

yours provisions in each one of these themes and circumstances.

8. RESPONSIBILITIES

CRB Members, in their daily activities and in the development of their respective Programs of action, are responsible per act accordingly with at guidelines defined in this Policy.

Therefore, they must be simultaneously responsible for the implantation, observance, diffusion and Warranty of greeting from them.

Issues relating to ethics, integrity and transparency may not be created by people what at face. They they can to emerge in occupation gives diversity in situations what if present in the your actions personal and usual professionals.

Occasionally, CRB Members may encounter situations where it is not clear whether an action is acceptable or not. Laws, culture, and practices are different in each country, and until same in many different regions of same country. At guidelines contained in this Policy allow to evaluate and identify great part of these situations, avoiding behaviors considered unethical, upstanding and transparent, but do not necessarily detail all these situations.

You Members should to have The consciousness in what deviations in conduct, it is per action, omission or complacency, attack society, violate the laws and destroy the image and reputation of the CRB. Thus, if the Member has doubts about what conduct to adopt in the face of a possible action questionable, own or in The 3rd, he must take along O subject matter to knowledge in your manager direct, and form open and sincere, until what The doubt it is healed. Ignore, omitting or claiming unfamiliarity, not It's acceptable conduct.

In support to Manager, O Integral also he can request clarifications together to R- Compliance gives CRB

In the event that there is any discomfort in the explicit position with your Manager, or if the Member has reasons to remain anonymous when reporting a possible violation of this Policy, he must use O channel line Ethic.

The Ethics Line channel is available at CRB, so that its Members, Third Parties, Clients and external audiences can safely and responsibly contribute information to the maintenance in environments corporate safe, ethical, whole, transparent and productive.

Retaliation against a Member who reports in good faith one worry on one conduct or suspicious in not conformity with at guidelines established at the definite appointment in this Policy.

ANNEX I - COMPLIANCE SYSTEM

O System in Compliance gives concessionaire Route of Flags SA ("CRB") It's compound per 10 integrated measures for the prevention, detection and remediation of non-compliance risks. O commitment of CRB Members, especially the Managers, in the implementation and practice of these measurements It's fundamental to the effectiveness and the efficiency of the system.



1. COMPLIANCE GOVERNANCE AT CRB

O Commitment with Performance Ethic, full and Transparent begins at the Advice administration gives CRB (“CA-CRB”), and he must if extend to the Members gives CRB.

2. ADMINISTRATIVE COUNCIL

Among the primary responsibilities of the CA-CRB are the maintenance of the Principles ethical, honest and transparent, such as Organizational Culture, the definition of Policies as developments for guide The your practice in matters specific and O zeal for the application effective of System of compliance, like one of these practices.

In its meetings, the CA-CRB must periodically and formally monitor the development of the System in Compliance at CRB. You members of CA-CRB should to be informed fur Responsible per Compliance gives CRB (“R-Compliance CRB”) on you aspects relevant gives implantation and of follow-up of System in compliance, well like on facts relevant arising. At agendas, minutes and resolutions of the CA-CRB on the subject Compliance must be formalized for what if constitute in evidence of the role of advisers on the subject.

3. RESPONSIBLE FOR COMPLIANCE

It will be up to the Chief Executive Officer of CRB to appoint the R-Compliance CRB, who will be elected based on ~~the~~ analysis of the Audit, Risk and Compliance Committee (“CARC”) and deliberation by the CA-CRB. The R-Compliance CRB will be subordinate, with regard to the PA of Compliance, the Audit, Risks and Compliance Committee and shall report to the CA-CRB whenever necessary, within Minimum quarterly, in the meetings ordinary of CA-CRB, making one update of progress of the area and any measures/innovations that have taken place. The CA-CRB may, at its discretion, exclusive criterion, guide O R-Compliance CRB directly about in certain subjects.

The R-Compliance CRB must remain in line with the Compliance Committee and the Audit, Risks

and Compliance Committee, especially in the event of events or the existence of matters that require specific alignment. It should also have the support of lawyers external or Providers in services outsourced Compliance, in order to ensure the necessary independence to deal with determined themes.

The R-Compliance CRB must have the skills necessary for its attributions, acting with independence of judgment. It is responsible for supporting the Chief Executive Officer of CRB (“DP-CRB”) and its team Members in the implementation of the Compliance System at CRB, and continuously monitor its effectiveness. For this purpose, and for the fulfillment of its assignments, according applicable, will tell with the support of Committee *Compliance*.

O R-Compliance CRB he must to have at next assignments at the scope of CRB:

- Promote the dissemination of the Commitment to Ethical, Integrity and Transparent Acting, creating and keeping mechanisms what to ensure compliance.
- Coordinate and supervise the operation of the Ethics Line channel and the Ethics Committee Ethic, forward identified, ensuring what all at complaints received be duly recorded, analyzed and resolved.
- Prepare and present reports and opinions to the appropriate people and committees, including investigation reports, internal audit and other matters related to the Compliance.
- To secure The existence and greeting in trainings on themes in ethic, integrity, transparency, management in scratches and audit, well like to recommend The creation or revision in guidelines, systems and procedures what guide The acting ethic of Members.
- Propose The Implementation in mechanisms what aim to secure preventively O greeting of provisions planned at the Commitment with The acting ethic, full and transparent from CRB.

The Compliance Committee and the Audit, Risks and Compliance Committee has autonomy and independence to coordinate the implementation of the actions necessary to ensure the effectiveness of the Compliance System at CRB, in support to R- Compliance CRB. Of this form, O R- Compliance CRB he must to have access to the resourcessuitable and enough for O development of your job, including:

- team of Members committed to supporting the development of compliance of proportionate shape to the CRB and to the scratches The she associates;
- sufficiency of budget allocated for the formulation, implementation and maintenance of the Compliance System, including for hiring independent advisors of recognized qualification; and
- access to all CRB Members, information, records, data, systems and facilities that if do needed.
- Lead The achievement of plan Yearly in audit Internal.
- Promote the monitoring of the process of identification, evaluation and treatment of potential risks, as well as internal control systems and compliance with laws, standards and regulations.

4. CRB MANAGERS

Managers at CRB, in the performance of the responsibilities inherent to their Programs of Action, should, per conviction, Act in form ethic, full and transparent, and guide their Led, including fur example, for what act gives same form. Therefore, you Managers shouldto be active and proactive adopting the following ducts, without to them if limit:

- To influence their Led fur example.
- Incorporate into your Action Programs and ensure they are on the Action Programs in their led O commitment to Act in Agreement with at provisions of this Policy.
- To implement and ensure The practice of System in Compliance no your scope of acting.
- To develop at actions under your responsibility, including you Law Suit derivatives, ensuring that the guidelines on Compliance defined herein are followed and the legislation applicable.
- To encourage O debate on O commitment at CRB with acting ethic, full and transparent and to clarify at questions and worries raised by the Led onO subject matter.
- Support their Led When these report events what believe me what violate at laws or O commitment at CRB.
- Ensure that your Team Members attend training events on Compliance promoted at CRB.
- Directly and indirectly promote (through professional associations, for example) actions with O objective in foment practices business ethics, intact and transparent, contributing to the formation and consolidation of a healthy business environment and competitive.

5. MEMBERS

It's up to Members of CRB:

- To know and Act according O Commitment gives CRB with acting ethic, full and transparent described in this Policy.
- Act, at the performance of responsibilities of your Program in Action, in Compliance with the provisions of this Policy.
- Participate in training activities on Compliance promoted at the CRB, which are related to your responsibilities.
- Consult the direct Manager, openly and sincerely, about any doubts regarding in what conduct to adopt against in one possible action questionable, own or in The 3rd.
- In the event that there is any discomfort in the explicit positioning next to your Manager, or if the Member has reasons to maintain anonymity in the report of possible violation The That Policy, O Integral he must use O channel Line in Ethic. Ignore, omitting or claiming

ignorance, no It's conduct acceptable.

6. POLICIES AND OTHER GUIDELINES

At Instructions Normative gives CRB aim guide at actions From their Members in matters specific, not treaties directly at Compliance Policy CRB.

So, he can be The need gives gift Policy to be detailed at CRB, per quite in others instruments that define guidelines or orientations for its effective practice, based on the identification and assessment of the risks involved, considering their specificities and those of the sector where they are inserted, such as Customers, suppliers, operation size, products and services, interactions with agents external private or public, legislation and local culture.

These documents with guidelines or guidelines additional should to be in easy access, understanding and application in actions of the Members to whom the documents are destine, regardless of your responsibilities.

THE practice disciplined and systematic of this Policy he can awakening us Managers, at the R- compliance, The need to create Normative Instructions or in rectify others CRB Normative Instructions.

In this case, the DP-CRB, in line with the R-Compliance CRB, must forward these proposals for consideration by the Audit, Risks and Compliance Committee, with the Board of CRB exclusively responsible for approving alterations or creations of CRB Normative Instructions.

7. RISK ASSESSMENT AND CONTROLS

CRB is subject to risks of the most diverse origins, such as operational, financial, regulatory, strategic, technological, social and environmental. Those scratches should to be duly evaluated and treated by the Managers. The effectiveness of this process is fundamental for O Enhancement of performance business and efficiency of System in Compliance gives CRB.

To a greater or lesser extent, there are risks in the actions of CRB Members. So they must to have responsibilities at the management From scratches involved in the your actions. Fits to the Managers to evaluate O degree in risk involved in the your responsibilities, and ensure what their Led also O do, adopting ever attitudes preventive, prospective and proactive at anticipation and mitigation in scratches.

O process in evaluation in risk conducted by the Managers he must to be structured, systemic, effective, supported per methodology and best practices in management in scratches corporate.

Managers at the CRB must, in a consistent and methodologically supported manner, assess the environment in scratches The what they are exposed and The adoption in controls, considering per example you next aspects:

- size of business.

- Sectors and locations in acting.
- Environment regulatory.
- Participations corporate what involve The people legal at condition in Controller, Controlled , affiliated or consortium.
- Structure organizational.
- Number in Members and in The 3rd.
- Interaction with The public administration.
- Structure economical and financial.

Beyond gives identification and prioritization From scratches, you Managers, counting with O support in your teams, should ensure O effective treatment From scratches, or it is:

- check The probability and O impact gives occurrence of risk, including you aspects intangibles.
- To define O degree in tolerance for you identified risks.
- guarantee the management of these scratches.
- Define the type of treatment to be adopted for each risk (examples: avoid, mitigate, to share or to accept) considering their effects and one analyze in cost benefit in treat them.
- Ensure that risk treatment plans are defined, incorporated into the Program in Action of the respective responsible and implemented.
- To communicate to R- Compliance CRB new scratches what yet not do part gives relationship in scratches mapped.

Fits to the R- Compliance at the process in evaluation of risk and controls:

- Support you Managers in the your responsibilities in identification and evaluation in risk with knowledge specialized technicians and methodological management in scratches.
- Support you Managers at definition From plans in action necessary for treatment From scratches identified.
- Report to the Audit, Risks and Compliance Committee the results of the risk assessments and the implementation of the respective controls.

8. COMMUNICATION AND TRAINING

9. COMMUNICATION

CRB's Commitment to Ethical, Integrity and Transparent Acting expressed in this Policy, and their developments should to be disclosed, making them affordable and understandable by the Members and by external audiences.

At guidelines gives CRB should to be transmitted in form clear and need, without posts dubious.

The R-Compliance CRB, with the support of the *Compliance Committee*, of the respective responsible for People and per Communication, should to develop and deploy plan in Communication what continuously ensure that the Commitment to Act Ethically, Integrity and Transparent, and any of its developments, are communicated and are available in places of easy access to all the public ones.

10. TRAINING

THE formation and O development of People presuppose The constant enlargement and deepening of your technical skills and behavioral.

The training for ethical, integrity and transparent performance of CRB Members must take place mainly through Education through Work, in the disciplined practice of the AP Cycle (Planning and Pact, Follow-up, Evaluation and Judgment). The evaluation dialog between Manager and Team Member, on ethical, honest and transparent performance, should result in a commitment in both in this sense, aiming to best performance at driving of Software of Action of Led and to the continuity of your self-development.

O commitment agreed in between manager and Led he must to be reinforced per Software in Education for Work with the aim of additionally qualifying them for the practice of provisions of this Policy, and its developments. These programs must be periodic and should contemplate you new Members, well like The update From Members already previously trained. You Managers should ensure what their Led be available for meet the CRB events with it is goal.

Records of Training Programs must be kept at the CRB, including identification of those trained, when and on what topics. Training programs should predict situations practices, studies in case and guidelines on like solve eventual dilemmas.

The R-Compliance CRB, with the support of the Audit, Risks and Compliance Committee, must implement mechanisms for follow-up and evaluation to ensure that Members have been trained, and that signed term in understanding and in commitment with one acting ethic, full and transparent.

In addition to training for Members, Managers and R-Compliance must identify groups in Members target, considering O Program in Action what develop, for qualifications in specific guidelines.

11. THIRD PARTY COMPLIANCE

The actions of Third Parties on behalf of CRB are the responsibility of CRB, as well as the actions of its Members. In this way, the Managers responsible for hiring and register of these The 3rd at CRB should deploy and formalize process in evaluation and diligence in The 3rd, with the support ache- Compliance CRB, following you following principles:

- The assessment and due diligence must be based on the risk presented by the Third Party. You The 3rd should to be Classified according criterion in risk preset.
- Assessment and due diligence must be applied consistently. Once defined the assessment

and due diligence rules applicable to a given risk category of third party, these rules shall apply to Third Parties with the same classification of risk. Exceptions to the general rules may be necessary, but must be substantiated and previously approved.

- The assessment and due diligence must be formalized. Records must be kept of the phases performed and of information obtained during O process in evaluation and diligence. Records must be kept not only of the Third Parties with whom you engage decided make partnership, but also those ones what the decision was by not to do.

Factors of risks what, among others, they can to be considered in evaluation From The 3rd:

- history of performance in the relations with The CRB.
- Frame corporate.
- Activity.
- Performance business.
- Source and nature From their resources.
- Value of contract and the form in payment or receivement.
- Representatives and final beneficiaries.
- Researches related to the aspects economic-financial.
- Regularity Supervisor.
- Location Where at activities are developed.
- Exhibition The People Politically Exposed.
- Be subject The sanctions economical and commercials.
- Exhibition and positioning at media.
- Researches related at questions reputational. Query The websites specialized, likeper example, but not if limiting to the following:

- Portal of Transparency for Query to Register National in Companies Disreputable and Companies (CEIS), National Register of Punished Companies (CNEP) and The Register of Entities private Without purposes Forbidden Profits (CEPIM).
- US Department website of Treasury for consulting the list of OFAC Sanctions – Office of Foreign Assets Control .
- HM Treasury Portal and Office of Financial Sanctions Implementation for query list consolidation of targets in financial sanctions of Kingdom United.
- Portal of the European Union or the competent authorities of each Member State of the Union European Union for consulting the consolidated list of persons, groups, and entities subject to sanctions financial from EU.
- Portal gives United Nations Security Council .
- Portal of Bank World, for queries in companies and individuals ineligible.

It is important to consider that the assessment and due diligence of Third Parties is only the first step in the process. Additional preventive measures must be provided for in written contracts and during O follow-up of activities of Third with the CRB.

Your relationships with The 3rd should to be formalized per quite in contract, with clauses specifics about commitment to compliance with local laws, including laws anti-corruption.

With base at classification in scratches of Third, he can to be required The definition in a plan in communication and awareness about the commitment to act ethically, with integrity and transparency, ensuring that O contents you have been duly understood.

12. ENGAGEMENT IN CLASS ACTIONS

THE participation in actions collective per quite in associations with others companies and/or entities of the sector is a way of expressing the commitment of the CRB Managers with the performance ethics, integrity and transparency, to share experiences, results and actions of the Company, to to demonstrate O maturation of practices in if to do business and of System in Compliance gives CRB.

In this sense, he must to be fetched, at CRB, O engagement in associations active at the subject matter and with other companies, in the adoption of fundamental and internationally accepted values about human rights, labor relations and the environment, combating corruption and competition unfair.

THE acting From Members gives CRB, in actions collective or individual, he must aim, priority, the improvement of the structuring conditions in the markets and in the environments where act.

These initiatives, therefore, should, in between others goals, be facing for support institutions, associations and universities in studies and proposals for the improvement of system institutional, to the definition of public policies and for the improvement of public relations private, potentiating the experience of collective actions.

For a fair and competitive business environment to exist, it is necessary that the private sector productive and you organs governmental, politicians and administrative, act, simultaneous and synergistically, supported by same values and with you same goals.

13. CHANNEL MANAGEMENT LINE OF ETHICS

14. ETHICS LINE CHANNEL

It must be made available to Members, Clients, Third Parties and external public, in a way continuously operating, a communication channel (“Line of Ethics”) that enables the Realization in complaints in conduct not according with one acting ethic, full and transparent by Members, third parties and Customers.

The Ethics Line channel must be widely disseminated to all audiences, especially for Members, Third Parties and Customers from CRB.

O channel Line in ethic he must be available at the portal external and internal gives Company, per telephone in dialing free.

THE protection to whistleblower It's guaranteed per quite gives possibility of receivement in complaintsanonymous and the prohibition in retaliation to the whistleblowers.

O use of channel Line in ethic he must to be assured per rules in confidentiality for protectthose who voluntarily want to identify themselves. Good compliance with the rules of anonymity, confidentiality and prohibition of retaliation is a key factor in ensuring the trust at the channel Line of Ethic.

15. RECEIPT AND CALCULATION OF COMPLAINTS

The management of the Ethics Line channel must be the responsibility of the R-Compliance CRB, which mustwelcome at allegations, together with one second person what he appoints.

O R- Compliance he must to secure what all at complaints received through of channel Line in Ethics, or through any other means, are independently recorded and investigated,impartiality, methodology and support cool, ensuring confidentiality, anonymity andprohibition of retaliation against the whistleblower. R-Compliance must conduct investigations, whether internally, with team in Members own, or in manner external with O aid incompanies specialized.

All complaints received and the development of investigations must be communicated periodically to the Audit, Risks and Compliance Committee of the CRB, with the exception of next situations:

- When the complaint involves any of the members of the Board of Directors of CRB, the R-Compliance CRB must communicate the result of the investigation directly to the Board of Shareholders.
- When the complaint involves the Chief Executive Officer, or one of his direct Leaders, or R-Compliance CRB must communicate the result of the investigation directly to the Audit, Risks and Compliance Committee.
- When the complaint involves the R-Compliance CRB or the second person who also receive The complaint he must forward it immediately to the Audit, Risks and Compliance Committee so that it decides on the appropriate actions.

During the investigative process, as soon as the R-Compliance CRB identifies strong suspicions or proof of improper performance, must share the investigation report with the Managerof Integral under study. This one manager he must to have autonomy and competence for treat of subject matterand to take at arrangements recommended. Ever what required, O manager and O R- Compliance CRBconsult the Person and Organization Officer and the Legal Officer on the arrangements to be adopted.

existing convergence in between The decision of manager and O R- Compliance CRB O process investigative ~~by the~~ ~~in the~~ ~~Compliance~~ Committee . If there is a discrepancy between the decision of manager and The opinion of R- Compliance CRB, you facts should to be presented to Committeeof *Compliance*

If there is a discrepancy between the Manager's decision and the opinion of the *Compliance* the facts must be presented to the Chief Executive Officer of CRB, who will be responsible for decision Final.

As a final step in the internal investigation procedure, the R-Compliance CRB must assess the obligation or convenience to communicate internally and/or inform any authorities or Third Parties regarding

the identified irregularities. Before that, however, you must your recommendation for be confirmed by the Committee in *Compliance*

During The investigation, or after your conclusion, When O R-Compliance CRB identify opportunities for improvement in the process that allowed the undue action, should suggest them to the responsible for the matter, who must have autonomy and competence to assess and, if applicable, deploy at suggestions given.

16. COMPLIANCE COMMITTEE

Compliance Committee , which aims to support the issues that involve violations to the commitment of acting with ethics, integrity and transparency.

Compete to Committee in *Compliance* :

- To evaluate and to discuss O result of investigations of complaints.
- Act with exemption and responsibility in your recommendations.
- Treat all at information and documents analyzed with absolute secrecy and confidentiality, regardless of subject matter.
- Submit improvement suggestions to the Audit, Risks and Compliance Committee *and* CA-CRB, in line with and with the support of the Audit, Risks and Compliance Committee.
- Support in resolving unforeseen ethical dilemmas, resolve doubts about situations controversial and ensure the maintenance of uniformity of criteria used in casessimilar.

17. COMPOSITION

Compliance Committee must be composed of at least three full members, one of whichtheir O R-Compliance CRB and the too much members as indicated of the CA-CRB.

18. MEETINGS

Compliance Committee shall ordinarily meet, once every quarter, in accordance with with O calendar issued fur your CR compliance, and extraordinarily per solicitation of R-Compliance or in any From their members of preference at thirst gives CRB.

19. COORDINATION

O R-Compliance CRB It's O coordinator of meetings of Committee of Compliance. THE him competes:

- Elaborate the annual calendar of ordinary meetings and give prior knowledge to its members.
- Lead at meetings of committee presenting to the their members O status detailed of investigations of complaints received, well like O status From related alignments with at

relevant leaders.

- elaborate reports analytical and with opinions with base in the investigations of complaints received.
- Define the need for extraordinary meetings, respecting the right of each of the their members from too request The convocation of these meetings.
- Evaluate and define the matters to be discussed at the meetings, including considering the recommendations From too much members of Committee in *Compliance* CRB summon up youcommittee members for the meetings, as well as informing the agenda, in principle, with advance minimum out of five days.
- Invite to participate in committee meetings, when necessary or convenient, others Members gives CRB, well like any others people what hold information relevant to the objective the meeting.
- elaborate minutes the meeting, containing, at the Minimum:
 - list From members gifts, duly signed;
 - presentation of cases investigated presented like attachment;
 - quote From too much matters treaties; and
 - recommendations From members of Committee of *Compliance* .
- Transmit the summary of the meeting to the CA-CRB, including the results of the analyzes, the actions performed, at opportunities in improvements identified and at recommendations From members of committee, case exist.

20. RISK MONITORING AND CONTROLS

Monitoring of risks and controls is the continuous evaluation of internal controls with the objective in check if these are adequate and effective for mitigate the risks.

O monitoring in scratches and controls he can to be done per quite in audits internal, externalor per quite of the evaluation continuous from indicators of risks key from CRB.

Risk monitoring must be part of the daily actions of CRB Members, the which are should be empowered for identify events what may generate scratches in not conformity with one acting ethic, full and transparent.

21. INTERNAL AUDIT

Internal auditing is an independent and objective activity designed to monitor, evaluate and make recommendations to improve internal controls, policies and other Company guidelines. Carrying out internal audits aims to support CRB Managers to achieve their objectives through a systematic and disciplined approach to evaluating and to improve The effectiveness From Law Suit risk management and controls.

O R- Compliance CRB, in alignment with O Audit, Risk and Compliance Committee he must to plan and to submit forCA-CRB contributions and approval, proposed annual internal audit plan, including

requirements for planning, methods for defining scope, carrying out audits and communication of the results.

The annual audit plan must be compatible with the Company's strategy and aligned with the Chief Executive Officer of the CRB. The plan must be based on the CRB risk matrix, taking into account consideration: the priority risks, the financial and accounting materiality of the processes, the reports to the Ethics Line channel, as well as the results of previous audits. The plan must aim to prevent and identify deviations and potential threats and identify opportunities of improvements.

Internal audit reports must be issued in clear and objective language, with the detailing suitable for understanding From matters treaties. In between others matters, should include assessment of controls, process maturity, key risks and identified vulnerabilities, as well as recommendations for improvement by level of criticality.

All at audits should to be conducted with objectivity and total impartiality. You results of internal audits must be presented to the Chief Executive Officer of CRB, for what together with O R- Compliance CRB and with O support of Committee *compliance* , evaluate The implantation of the resulting recommendations, and to the CA-CRB, for knowledge, including the decisions of the Managers.

O R- Compliance CRB, in alignment with O Audit, Risk and Compliance Committee, he must to accompany The Implementation of recommendations awake, reporting O subject matter periodically to CA-CRB To carry out internal audits, the R-Compliance CRB, with the support of the Audit, Risks and Compliance Committee, he can:

- Request to the too much Members what prepare or make available at information, Dice From systems, documentations and necessary clarifications.
- To have access The all you Members, information, records, Dice, systems and at facilities that if do needed.
- Request information and confirmations together The The 3rd, per quite From responsible by the contacts with these The 3rd.

If the R-Compliance CRB decides to partially outsource the internal audit work, these must not be carried out by the same company that provides the external audit service independent.

22. EXTERNAL AUDIT

Subject to the applicable provisions, the main attribution of the independent external auditor is to analyse, audit and issue an opinion on whether the financial statements prepared by the Administrators gives Company represent properly, in all you their aspects relevant, the position patrimonial and financial of Company.

THE independence From auditors external It's fundamental for what they may to evaluate at demonstrations financial with exemption.

The CA-CRB, based on the recommendations of the Audit, Risk and Compliance Committee *and the* Finance Officer gives CRB, he must to approve The hiring of controller external independent for accomplish The analyze and The audit of demonstrations financial, and in any other service, and issue your seem. He must also ensure that none of the additional services contracted from the external auditor can to place in risk The

objectivity and The independence required his. auditors external Independents must not audit the product of their own work, must not promote or defend you interests gives Company audited and not should Perform functions managerial forthe audited company.

It's up to auditors external independent gives CRB:

- report to to respective Advice in Management and Audit, Risk and Compliance Committee .
- Express your conclusion on the financial statements through a report issued from Agreement with at auditing standards applicable.
- Evaluate whether the internal controls used are adequate and sufficient to allow the elaboration in demonstrations financial what not present distortions, regardless if caused by mistake or fraud.
- Issue report with recommendations arising in your evaluation From controls internal held during O process in audit.
- To report to Audit, Risks and Compliance Committee possible disagreements arisen us dialogs with you Company Administrators, or if there were difficulties in obtaining the information needed.

23. RISK INDICATORS

O R- Compliance CRB he must to implement monitoring in indicators in scratches aiming:

- Timely detection and control of potential situations of fraud, diversion or losses financial.
- Follow-up in flaws recurrent and establishment of actions corrective.
- Demonstration gives evolution From scratches in manner to be continued for you Managers at Company and for the CA-CRB, with support from the Audit, Risks and Compliance Committee Establishment of common performance indices used as a reference between places and many different Companies, When applicable.
- Identification in Tendencies related The mistakes or irregularities, considering time, Company, locality, process and sub process.

24. REMEDY RISKS AND STRENGTHEN CONTROLS

After identifying, evaluating and measuring the risks, it must be defined what the answer given at situations in exhibition The remaining risks.

Responding to risks involves identifying one or more options for mitigating risks. the options of risk responses are not necessarily mutually exclusive or appropriate in all at circumstances and they can include avoid it, reduce it, share it or accept it The to depend of tolerance and of appetite at risk at CRB.

Selecting the most appropriate risk response option involves balancing, on the one hand, the

implementation costs and efforts and, on the other hand, the resulting benefits, relative to the legal, regulatory or any other requirements, such as social responsibility and gives protection to quite environment. It suits what at decisions also take in consideration risks that demand an economically unjustifiable treatment, such as, for example, severe risks (with a large negative consequence), but rare (with a very low). Various treatment options can be considered and applied individually or combined.

THE Company, usually, if benefits with The adoption in one combination in options in risk responses. When selecting risk treatment options, they should be considering the values and perceptions of stakeholders, and the most appropriate ways to communicate with them. When risk response options could affect risk in others environments of the Company, or with parts interested, it suits that those involved participate of the decision.

At the plan in answer to the scratches should be clearly identified The priority in Implementation of the risk response, its deadlines and The definition of those responsible.

Risks must be addressed by strengthening the controls environment. In this sense, It's important what be developed and implemented in each Company at strategies to mature and strengthen its controls environment on an ongoing basis and in alignment with your goals, especially when new activities or achievements increase O level of exhibition to risk.

O R- Compliance CRB, in alignment with O Committee *compliance*, he must to accompany The implementation of risk response and process improvements identified as necessary the Compliance team and which were aligned and agreed with the Process Managers analyzed.

25. DISCIPLINARY MEASURES

Measurements disciplinary should to be adopted in as a result gives violation of guidelines expressed in the commitment to acting ethically, with integrity and transparency in order to guarantee the seriousness of Compliance System.

O Principal President gives CRB he must to secure what, at implantation of System in compliance, at the your scope in responsibility, exist measurements disciplinary for O case of occurrence in deviations in acting ethic, full and transparent. These measurements disciplinary should to be proportionate to type in violation and O degree in responsibility From involved. THE ready interruption of irregularities and the timely remediation of risk situations, may include, but are not limited to the following actions: the dismissal of a Member, including for just cause, verbal and formal warnings, cancellation of contracts, suspension of payments, among others. others.

In these measurements disciplinary, he must be also Preview The possibility in adoption in measurements precautionary, like O remoteness preventive in Members what may to disturb or to influence the proper course of investigation of the complaint, suspension of Third Party contracts, among others.

ANNEX 2 - COMMITMENT TO ACTING ETHICALLY, INTEGRAL AND TRANSPARENT

26. RESPONSIBILITIES

The Members of Concessionária Rota das Bandeiras SA ("CRB"), in their daily lives and in the

development From their related Software in Action, are responsible per Act in formethics, integrity and transparency, in accordance with the guidelines defined in this Policy. Therefore, must be simultaneously responsible for the implementation, observance, diffusion and inspection of the fulfillment of same .

Occasionally, CRB Members may encounter situations where it is not clear if one action It's acceptable or do not. At laws, The culture and at practices are many different in each country, and until even in different regions of the same country. The guidelines contained in this Policy allow to evaluate and identify great part of these situations, avoiding behaviors considered not ethical, but not detail, necessarily, all these situations.

Members must be aware that misconduct, whether by action, omission or complacency, attack society, violate the laws and destroy the image and reputation of the CRB. Thus, if the Member has doubts about what conduct to adopt in the face of a possible action questionable, own or Third Party, must bring the matter to the knowledge of its Manager straight from openly and sincerely, until the doubt be healed. Ignore, omit or claiming ignorance, no It's conduct acceptable.

In the event that there is any discomfort in the explicit position with your Manager, or if the Member has reasons to remain anonymous when reporting a possible violation of this Policy, must use the Ethics Line channel, through the tools available in the Internet and line of telephone free, how described Next:

- Free telephone line, 0800 calls, available 24 (twenty-four) hours a day, 7 (seven) days per week. O system provide information on like O possible Detour in conduct must be reported. For reports related to the CRB, the contact number is available at the place electronic gives Company.
- You reports via Internet should to be deeds through in place electronic specific and released by Company for such purposes.
- The Ethics Line channel is available at CRB, so that its Members, Customers, Third parties and external audiences can safely and responsibly contribute to information for the maintenance of safe, ethical, integrity, corporate environments, transparent and productive.
- Not It's allowed nor tolerated retaliation against a Integral what report in good faith one concern about conduct or suspected non-compliance with guidelines established at the commitment defined in this Policy.

1.1 RESPECT THE LAWS

Acting in accordance with the applicable laws and regulations values the moral and shareholders' material and contributes to socioeconomic and business development in the sector and region Where the CRB operates.

Therefore, at the development of your programs Action, CRB Members must to respect and to obey at laws, regulations, practices and Good mores in each country or region on what act.

The context of the diversified and dynamic business in which CRB operates imposes the behavior of

Members that goes beyond the text of the law. Members must preserve the spirit of the laws and regulations, observing you most elevated standards in ethic, integrity and transparency, preventing until same the appearance of acts inappropriate.

This responsibility also involves the adoption of appropriate measures, when they have knowledge of irregularities committed, which may compromise the reputation or the interests of the CRB.

While there may be arguments about cultural conditions or customary market practices, you Members should Act ever with base us Principles and in the guidelines specific defined in this Policy. Therefore, you Members should Act in a way

The contribute individual and collectively for changes needed us markets and us environments Where there may be induction to deviations in this conduct.

Doubts regarding the legality of a conduct must be clarified with the ResponsibleCRB Legal.

2. ENVIRONMENT IN I WORK

Relations between CRB Members must be guided by cordiality, discipline, respect and trust, influencing and being influenced, at search of what It's O right, regardless of program what play.

Managers at CRB must guarantee their team members a work environment free of insinuations or discrimination in any nature, avoiding possible constraints personal.

THE equity at the treatment in between you Members It's essential for what these if feel agents in their own destiny and contribute to the CRB and to the construction of fairer societies, prosperous and inclusive.

Diversity in work environments contributes to the appreciation and respect for different gender identities and sexual orientations, religions, races, cultures, nationalities, classes social, age, physical characteristics, as well as for innovation and creativity in Companies taking advantage of the potential arising from the positive aspects of the differences between people.

All Members must be treated fairly and equitably with respect to their differences, and ensure non-discrimination and non-existence of restrictions of any species.

In the situations in I work, Where would you like what they occur, you Members, beyond in to accomplish with you requirements cool in each place, should to respect you rights humans recognized internationally, including but not if limiting:

- To respect for dignity.
- to value decade people.
- to the right The life and to freedom.
- THE freedom from opinion and in expression.
- free Association.
- to the right to I work and The education.

Human Rights must be observed for their universality, for being applied in aequal and without discrimination to all people, by inalienability, since no one can be deprived of these rights, and by their

indivisibility, insofar as they are interrelated and interdependent.

The use of the position of Manager to request favors or personal services from Led. Neither is the abuse of power or authority by a Manager who may result in actions by its Leaders that conflict with the laws and regulations in force. Do not admit intrusion at life toilet of people, not in environment in neither work nor outside his.

The use of alcoholic beverages and drugs in the workplace is prohibited, as well as the entry on CRB premises of people who are drunk or under the influence of substances that cause interference with their behavior that may affect the safety and activities from other people.

Are forbidden The commercialization and The exchange in goods or services in interest private in the dependencies of Companies.

2.1 OPPORTUNITIES

All, at CRB, should to have equality in opportunities in I work.

So, us procedures in identification, hiring, assignment in challenges and responsibilities, opportunities in development and empowerment, evaluation in performance, definition of remuneration and benefits, and other practices, the requirements necessary and O merit of people, express us results of your I work, in the your qualifications personal and professionals and in its potential.

2.2 WORKING CONDITIONS

Work is a dignified activity. The potential of being is valued through work human, such as the spirit of service, the ability and desire to evolve and the will to overcome results.

Therefore, forced labor or similar conditions, work childish, exploration sexual and traffic in beings humans in the activities gives CRB, nor in the activities of agents or partners of business in your jail in value.

2.3 HARASSMENT

O harassment, in all at your shapes, viola The trust and O respect in between you Members. Therefore, Threats, bullying or sexual harassment of any kind, including but not limited to not if limiting, in relationship at women. Also not are tolerated situations what configuredisrespect, intimacy, bullying or threat at the relationship in between Members, regardless of your responsibilities.

Moral harassment is the practice of abusive conduct committed by one or more people against a individual, usually in a repetitive and prolonged manner, in order to coerce, humiliate, disrespect him, disparage him or embarrass him during The journey from I work.

Sexual harassment is when someone in a privileged position uses that condition to coerce or offer benefits to one individual for get advantage or favor sexual.

2.4 HEALTH SECURITY AT THE I WORK AND QUITE ENVIRONMENT

Managers have a duty to promote their own health and to support their Team Members in this sense, as well as promoting operational safety and environmental conservation in communities in what act.

CRB Members must know and comply with the requirements related to the protection environmental, The safety at the I work, The your own health and From too much Members, in subcontractors and too much people involved directly in the your activities.

Members must meet the legal requirements and those established by the CRB for the control From scratches The health, The safety and to quite environment what may to occur us environmentsexternal and in communities in as a result of CRB activities.

In case of accidents and resulting inspections involving CRB, its suppliers or Customers, Members who first come into contact with the incident or with the authorities public should to have O to owe in perform Communication readily, and later also per written,those responsible for internal safety at work and/or the environment, as the case may be, as well as like to the their Managers immediate.

You Members not should prevent The Prohibited or hinder O I work in tax, police environmentalor auditors tax of I work in the installations gives CRB. O follow-up in such authorities,meantime, must be performed by qualified members and trained for This one end.

2.5 USE AND PROTECTION IN ACTIVE

You members gives CRB should Act for add value to patrimony The they trusted and use itto the actions related to the interests gives Company.

Fits to the Members gives CRB watch over for the conservation and protection From active tangible and intangiblesof the Company, which include data, information, installations, machines, equipment, furniture, vehicles and values, among others.

You resources in Technology gives Information, such like telephone, emails, access The Internet, software, hardware and other equipment, made available to Members, must be used for O attendance at your needs in I work.

O use in resources in Technology gives Information made available for the CRB, like telephone, emailand access The Internet, for matters private he must to be done in form conscious and restrained.

Data, records and information produced by Members and kept physically or in CRB's information systems are the exclusive property of CRB. The Member must be aware that CRB has access to internet usage records, emails and other informationstored us their computers, well like to the records in use From resources in telephonymobile and fixed, so no he must to have privacy expectation.

2.5.1 IDENTIFICATION, MAINTENANCE AND SAFEGUARD IN RECORDS

THE existence in records and systems in information upright and reliable It's fundamental for a transparent action that strengthens the relationship between the Member and between them and the Clients, the Shareholders and you The 3rd.

CRB Members, in the development of their Action Programs, produce, receive and transmit, in different forms, various types of data, records and electronic information or printed, what must be identified,

kept and protected properly.

It is the duty of the Members to identify, maintain and safeguard the records, in the Minimum, full time course specific required per law, regulation or process cool applicable or fulltime required to O development of activities business gives CRB.

The destruction of records relating to a court summons, extrajudicial notice or which are relevant to an investigation or litigation may, even if inadvertently, cause harm for the CRB. If the Member has doubts whether a specific record is related to a investigation or litigation, or The one quote, or on like to preserve types specific in records, must preserve the records in question and consult with the Legal Officer at their place of business. acting, for to determine O course in action The to be taken.

Your records should to be kept in the installations gives CRB or externally, in locations suitable for this purpose. No records relating to the CRB shall be kept in the residences in Members or in any other place inappropriate in form permanent or period prolonged in time.

Under no circumstances may CRB records be selectively destroyed in order to harm The your availability for use in a process cool or investigative. Being so, The Upon becoming aware of a subpoena, investigation or legal proceeding, Members must immediately preserve you records that perhaps be related to subject matter.

You Members gives CRB should to respect The privacy From Customers and Providers keeping in secrecy of yours registrations, information, operations, services hired etc.

2.5.2 PROTECTION IN INFORMATION PERSONAL

CRB is committed to treating the personal data of our partners, directors, administrators, employees, interns, service providers, partners and any person who maintains an institutional relationship with CRB, with the highest level of protection, privacy and secrecy. All information collected is stored and treated in an ethical and responsible manner in compliance with Brazil's data protection legislation, including the General Law for the Protection of Personal Data - Law No. 13,709/2018 (“LGPD”).

CRB Members or Third Parties, on behalf of CRB, who need to use, access, collect, store, change, disclose, transmit or destroy personal information of Members or other persons in the power of the CRB, must act in strict compliance with the legislation and the current regulations on protecting the integrity and confidentiality of information private of a person.

It is understood like information personal those what may to be used for direct or indirectly identify a person, including, but not limited to, name, address, registration numbers, telephone, physical attributes, e-mail, as well as any information that may to be associated The people, such like Dice in health, dependents, properties, situation financial, performance evaluations and behavioral, among others.

Information personal in Members and in others people in power gives CRB should to be protected against loss, theft, unauthorized access, use, disclosure, reproduction, alteration or destruction, and without authorization. At personal information should to be used in form restricted, ensuring:

- What only information needed will be collected.
- What be used for you ends for you which are they they were collected, except

When The own person consent a use different.

- THE safety, veracity, accuracy of information.
- O right to intimacy of people.
- What only people authorized The handle them in virtue in your activities professionals will have access to personal information as needed.

2.5.3 INFORMATION CONFIDENTIAL AND PRIVILEGED

You Members should to preserve and ensure The confidentiality of information gives CRB what:

- if disclosed inappropriately, they can to be Useful for competitors or harmful for the CRB, your customers, or The 3rd; and
- may to be important for decision in a investor in purchase, sell or to maintain titles gives CRB or in your business partners.

You Members, Shareholders or The 3rd what during O development of your I work have knowledge or access The information confidential and privileged of the CRB not should:

- Negotiate shares of CRB or of third parties based in these information.
- publicize them for The 3rd, what can, with base in these information, Negotiate actions gives CRB or of its Third Parties.
- To disclose information confidential at interaction with relatives and friends.

3. RELATIONS WITH SHAREHOLDERS AND INVESTORS

A satisfied customer is the foundation of CRB's existence. Therefore, the basic principle of action CRB Members' business must be to serve the Client, anticipating their demands and attending at your expectations with emphasis on quality, in productivity and on innovation, with social responsibility, community and environmental, and with full respect at laws.

You Members are forbidden in promise, to offer or to give, direct or indirectly, benefits, favors, gifts, entertainment or any thing in value for employees or people what represent CRB Clients with the purpose of influencing, securing or rewarding them for one decision in the interest of the CRB and/or obtaining in Advantage Undue.

4. RELATIONSHIP WITH SHAREHOLDERS AND WITH INVESTORS

The CRB Shareholder expects that the CRB Chief Executive Officer and the other Managers in the

Line of Entrepreneurship :

- contribute for The consolidation of Good image of CRB.
- manage riches morals and materials reflected at to be continued valuation economical of your patrimony, tangible and intangible and at the return growing and consistent in your investment.

CRB Shareholders also expect that the management of their assets will provide results ever increasing and consistent, with return suitable of your investment.

They also hope that a good image of the company in which they participate will be created and consolidated. You too much Investors are satisfied with O return adequate to the their investments and with The valuation insured your invested equity at CRB.

The relationship with all Shareholders and with other Investors must be based on accurate, transparent, regular and timely communication of information enabling them to to accompany O performance and at Tendencies gives respective Company, especially those what impact tangible results and intangibles.

For so much each Integral he must if to secure what at information arising of your activities are being produced and organized so that they can be made available to Members gives CRB responsible for the Communication with you Shareholders and with you too much Investors.

5. TRANSACTIONS WITH PARTIES RELATED

Transparency and open communication are fundamental in all relationships of trust, including in the relations with parts related.

Related parties are any natural or legal persons that fit in one of situations below:

- detain shares of Company or be likely to exert Influence Significant on Is it over there.
- Whether directly or indirectly, Controlled by a Parent of or under the control of ordinary in shareholder who exercises control or Influence significant about The Company.
- It is one People Key, or your Relative Next, gives Company, in your Controlled, in your Controlling Company or any legal entity that exercises Significant Influence over the Company.
- Whether a Controlled Company, jointly or separately, by or under Influence Significant of any people mentioned in item above.
- It is Society Controlled, what you have participation shareholder in The 3rd).
- For whatever reason or circumstance, you are in a condition or situation where there is founded fear in what not be likely to to hire in conditions in market, Where you following principles are respected:
 - competitiveness (prices and conditions of services compatible with those practiced in

the market);

- Compliance (grip From services rendered to the terms and responsibilities contractual practiced for the Company, well like to the controls suitable in safety of information);
- transparency (adequate reporting of agreed conditions, as well as reflections of these in the demonstrations financials of the Company); and
- equity (establishment in mechanisms what prevent discrimination or privileges and in practices what ensure The not use in information privileged or opportunities business in benefit individual or in The 3rd).

Transactions between related parties include and are not limited to the transfer of funds, installments in services or obligations in between The Company and one part related, regardless to be charged a price in counterpart.

At transactions gives CRB and parts related should to adopt at next diligence, without loss of others what can be defined by quite of procedures specific gives Company:

- THE transaction in between parts related he must to be traded in form independent, with the purpose of prioritizing the interests of the Company and optimizing social results, adopting treatment equitable to all the shareholders.
- Decisions must be taken in a reflective and reasoned manner, adopting the instruments what ensure your transparency.
- The transaction between related parties must be entered into in writing, specifying in the respective instrument its main conditions and characteristics, such as the form in hiring, prices, deadlines, guarantees and main rights and obligations.
- THE transaction in between parts related he must to be approved fur Advice in Management, if any of the cases provided for in its bylaws apply owing to be previously submitted for analysis by the Committee *compliance* and respective approval of the Board of Directors of CRB, if applicable, according to the bylaws Social and/or Agreement of CRB shareholders.

Compliance Committee's statement about the feasibility, benefits and convenience of the transaction in between parts related will have character technician and advisor of Advice in Administration of CRB and not will generate It is made binding.

- Case requested fur Committee *Compliance* gives CRB, any people bound for the gift Policy what it is considered like one part related can to be guest The to participate gives respective meeting of referred Committee in mode The to clarify O your involvement and The to provide information on The transaction in between parts related.
- If a shareholder or a Key Person of the Company, its Parent Company or its Controlled,

is in conflict in interests in determined transaction in between parts related, should inform such situation and abstain in to participate From Law Suit negotiating and decision-making related to the transaction between related parties. If you stop express their conflict of interest, any person who has knowledge of the situation you should do it.

- So much O Committee *Compliance* how much O Advice in Management gives CRB , When for O case, should receive information complete and per written on at main characteristics and conditions of the transaction between related parties, such as the form of hiring, price, deadlines, guarantees, conditions in subcontracting, rights and obligations, clauses specific like exclusivity, not competition and any others relevant to the decision-making process, as well as the alternatives considered by the administration.
- THE approval gives remuneration From administrators gives Company not if characterizetransaction in between related parties for you effects gives gift Policy.
- THE transaction in between parts related he must to be approved fur Advice in Management, if applicable any of hypotheses planned in your social status.

IT'S fenced The transaction in between parts related what:

- do not observe the rules established at gift Policy.
- Arrange for the granting of loans in favor of the Company's Controllers and parties to they related.
- It is approved without observance The legislation applicable, statute Social and Agreement in shareholders from the company.
- Key Person is any individual who, directly or indirectly, has authority and responsibility fur planning, direction and control of activities gives Company, suchlike administrators with power in management, directors, statutory or not, and members of the council in management.

6. RELATIONSHIP WITH PROVIDERS

Relationships with suppliers and service providers must be based on discipline, respect and trust, attending to the best interests in both at parts ensuring return to the its Shareholders and valuation of your patrimony.

You Members gives CRB should Act with diligence at identification, at hiring and at maintenance in Providers in products or providers in services, seeking out O best interest of the Company, based on fair, transparent criteria, including technical criteria and professionals, such as competence, quality, deadlines, price, stability financial, reputation, in between others.

THE principle, you Members gives CRB not should to hire directly Providers (people physics or legal), what be in your own property or interest, or what you have Relatives Upcoming what control them or what on them have Significant Influence.

If the Member needs to hire suppliers that present one of the situations above foreseen, you must discuss the matter with your Manager and obtain his prior written authorization what he must to be sent to R- Compliance Company for record. You contracts with you Suppliers must be objective, with no room for ambiguity or Commissions, and must contain specific clauses about the commitment to comply with local laws, including with anti-corruption laws.

Members responsible for contractual relationships with suppliers must take care so that they undertake to observe the provisions of this Policy, especially if, per provisions contractual, O Third, in some form, represent The CRB. Not It's allowed to hire, to maintain or renew, relationship contractual or not, with people or the 3rd what disrespects O commitment defined in this Policy.

7. FREE COMPETITION

THE free competition stimulates the creativity and The continuous improvement and promotes the productivity.

Competition laws are designed to protect and promote free and open competition and should guide at actions From Members gives CRB, well like in The 3rd what legitimate and directly represent the company.

Actions that have as their object or that may produce the following are prohibited by law: effects:

- Limit, falsify or in some form harm The free competition or The free Initiative.
- Master market relevant of goods or services in a way illicit.
- Increase arbitrarily the profits.
- exercise in form abusive position dominant.

Thus, CRB Members must act in strict compliance with the law and the rules aimed to preserve The free competition, being fenced practices or acts what have per objective thwart or defraud O process competitive.

7.1 RELATIONSHIP WITH COMPETITORS

In the normal course of their actions at the Company, CRB Members relate and interact in form legitimate with competitors in meetings or yet at the scope of associations in class and unions. On these occasions, the exchange of information that could harm the free competition in mode The favor the own Company or a competitor or harm you.

CRB's competitors may also be its Clients, partners or suppliers. in this hypothesis, communications with Competitors must be strictly restricted to those that support O relationship in question.

In form The to secure what The interaction with competitor is in conformity with The law and with standards in defense gives competition, O Integral he must guide your relations with you competitors according to at guidelines Next:

An agreement, tacit or express, understanding or arrangement with competitors that has per objective:

- restrict The competition;
- share or to allocate Customers and/or territories;
- leave in purchase products in a provider or type from supplier;
- leave in sell right product or provide determined service: in form general, in determined area geographic, and/or for determined category of Customer;
- limit The the amount or the quality in your production or The quantity of products whatwill sell or O kind of service which it will provide to any Client;
- abstain in throw new products or in discontinue products obsolete; and/or - speed up or to postpone O launch or The discontinuation on one product or service.
- fix, increase, reduce or to maintain prices;
- establish prices minimum and maximums;
- grant or to eliminate discounts at the price; and
- use special terms, conditions or types of pricing systems. the prohibition of price fixing agreements applies both to the prices of products sold and/or services provided for the Company and their competitors The their related Customers, about the prices that the Company and their competitors pay to their Providers.

- The mere attempt (albeit unsuccessful) to reach an agreement may constitute an illegal act in between competitors.
- IT'S tight to exchange information and/or discussion in questions commercially sensitive, suchsuch as: prices, pricing policies, terms or conditions of sale (including promotions, schedule of promotions, discounts and subsidies), credit terms and billing, terms and conditions offered by suppliers, profit or profit margin, costs, plans in business and in investment, level in capacity and plans in expansion, bids, including The intention in to present or not one proposal for a particular contract or project, new products or product innovations, terms in Warranty, in between others.
- Not participate in meetings where competitors discuss pricing or other market. If the meeting starts and then there is a discussion about prices or aboutany a From others themes mentioned above, O Integral must leave from the location.
- No Member is allowed to authorize the sale of products or services to prices overly lows (or it is, below of cost total, including margins normal operating costs) with the intent of harming competition or eliminatinga competitor. In none hypothesis, O Integral he can fix you prices below of the cost of the product or service in order to "discipline" or "retaliate" a competitor with the intent to eliminate it, harm it or force it to adopt a certain policy of prices or politics competitive.
- You Members gives CRB not should search, or same appear search:

- to control you prices, the entry or at conditions in competition on one market;
- to eliminate or discipline a competitor; or
- win all at sales or one portion predominant in market of form illicit.

The Business Plans of the Companies are based on profitability, growth and others economic success criteria. Under no circumstances can these plans be based on control in market, domain in market in a way illicit or elimination in competitors.

- At the case in bids for contracts with O government or with institutions private, or in other nature, the following types of agreements, understandings, or arrangements between Company it is a or most competitors are strictly prohibited:
 - prior discussion or exchange in information specific on The bidding.
 - Revelation or discussion on The participation in bidding.
 - Submission of fictitious proposals or coverage, “pro forma”, which are too high or which contain special terms in order to make them unacceptable, but presented as genuine.
 - Bid rotation, in which bidders agree to rotate between who presents the proposal with O value lower.
 - Suppression or limitation of the proposal, when competitors agree to abstain to submit a proposal or withdraw their respective proposals so that the proposal from another competitor it is accepted.
 - Subcontracting agreements whereby competitors agree that, if too much not participate gives bidding or present proposal in roof, will be offset by quite in subcontracting.

In some circumstances, it may be desirable and/or necessary for the Company to file a proposal joint with a competitor for determined project. Activities joint, they can to give opportunity The questions competitive complex. Per this, need be well documented for what stay clear to your legitimacy and The your rationality economical.

CRB Managers should seek to win business and market share by merit of the best price, quality, deadline and service. No Member should perform Business or propose actions what disobey the provisions of this Policy.

7.2 RELATIONS COMMERCIALS WITH CUSTOMERS AND DISTRIBUTORS

Some practices and arrangements commercials with Customers and distributors they can harm The competition and violate competition laws. In order to ensure that the relationships dealings with Customers and with distributors are in compliance with the laws of defense gives competition, the member must follow at guidelines Next:

- In hypothesis some, you Members gives CRB should try coerce Customers or distributors The leave in purchase products or services in competitors gives Company or to do restrictions territorial what manage effects harmful to market. O block in sources of inputs or in channels of distribution it's forbidden.
- Not there must be unjustified refusal of contracts. To ensure that the termination in commercial relations with Customers and distributors is lawful, the decision to end the relationship commercial with Customers and distributors he must if guide in justifications you negotiate or solid commercials. Under no circumstances may Members be involved in agreements with other Customers and distributors to end the business relationship with other Customers and distributors.
- Do not treat unequally Customers who have the same characteristics and who cannot be differentiated for objective commercial reasons. customers can be treated differently when there are justifiable reasons, such as, for example, discount concessions based on the volume purchased, location, capacity of purchase, credit, among others.
- Condition the purchase of a product or service to the purchase of another product or service may violate antitrust laws and regulations. No Member may impose as a condition for the purchase of a product or service the purchase of other.
- The practice of dumping or predatory prices (below the average variable cost, aiming to eliminate competitors) It's prohibited.
- Not It's practice acceptable The discrimination unjustified in prices in between you buyers or The fixation in prices or in conditions in resale per distributors.
- Case if decide for the imposition in clause in preference, exclusivity or not competition in a given contract, it is recommended to consult the Responsible Company's Legal Department, at the place of operation, so that the legality of the desired conditions, or the eventual need for prior notification to the defense gives competition.
- O abuse of power in market or of power economic and O closure in market are unacceptable practices.

7.3 RELATIONS COMMERCIALS WITH PROVIDERS

Certain business practices and arrangements with suppliers may harm competition and violate the law and competition rules. In order to ensure that the relationships dealings with suppliers are in compliance with the law and defense regulations. competition, O Integral he must follow strictly the guidelines The follow:

- Not he must be refusal unjustified in contracts. THE decision in close relationship commercial with provider he must if guide in justifications you negotiate solid and/or

breach of contract and must consider the legitimate interests of the parties. In none hypothesis, O Integral he can if to involve in agreements with others Providersto finish the relationship commercial with O current supplier.

- CRB Members must not condition the purchase of products and services to reciprocal purchases of the Company's products or services by the supplier. The term "reciprocal dealing" or "reciprocity" refers to the use of the buyer's purchasing power manufacturer, or the service provider, to coerce a supplier to grant it advantage in sale of product or in installment of service.
- Under no circumstances should CRB Members try to coerce suppliers to leave to sell, negotiate or quote for its competitors. The Members of CRB not should interfere in form some at the relationship in between their Providersand the their other Clients.
- CRB Members can and should negotiate to obtain the best form lawful, seeking out you best prices, rebates and conditions most favorable in purchase. At the however, While buyers, you Members not should intentionally induce prices, rebates promotional or services what configure treatment systematically uneven and not justified per reasons commercials or marketing. Gives same form, you Members not should trick a supplier with information untrue, like volumes hypothetical in purchase, perexample, The end in get proposals commercials in conditions most competitive.
- Agreements for purchasing collective only they can to be signed case at next conditions be duly answered:
 - exist one justification economical for firm such Agreement, like per example, largerefficiency and lower cost; and
 - O Agreement not must generate effects anticompetitive.

7.4 PROHIBITION IN PRACTICES COMMERCIALS UNFAIR

Various forms of unethical, oppressive or unscrupulous activities that may harm competitors, Customers or Providers are considered illegal, and not are tolerated, including, but not limited to misleading advertising and practices such as disparagement of another company's product, harassment of Customers, bribery and business kickbacks, use of misleading of sales and publicity, and theft in secrets commercial or Customer list.

7.5 LICENSES AND PATENTS

The laws governing licensing agreements between competitors, particularly those referring to technology licenses, are usually complex, and can be interpreted as practices that inhibit the free competition, in addition to involve contractual obligations that they can to affect The own company or The 3rd. Therefore O responsible Legal gives Company he must to be consulted before in if firm contracts in

licensing with competitors for to recommend the necessary actions.

8. COMBAT THE CORRUPTION

Acting in compliance with anti-corruption laws values moral and material assets of Shareholder. IT'S, therefore, fundamental O commitment From Members gives CRB in to accomplish withat laws of fight against applicable corruption us locations in acting, or with efficiency International.

CRB Members must assume the responsibility and commitment to fight and not tolerate Corruption, in any of its forms and context, including private Corruption, Extortion and Bribery, and to firmly and decisively say no to business opportunities that conflict with This one commitment.

considering at miscellaneous legislations anti-corruption, at which are we must to have The conviction inattend, CRB Members and Third Parties who act directly or indirectly in the interest or benefit from the company, they are prohibited from:

- To offer, promise, induce, to give or authorize, direct or indirectly, Advantage Undue or Valuable Thing to any person, especially to Public Agents or third person related to them, with the objective of influencing decisions in favor of the Company, or what involve one form in gain folks what be likely to to affect you interests gives Company.
- To offer, promise, perform or to accept payments in facilitation, what are payments considered insignificant performed The any a Agent Public, or third people The they related, with O objective in try ensure one advantage, usually for streamline actions routine or not discretionary, such like permissions, licenses, customs documents and other official documents, or police protection and others actions in nature similar.
- Request or accept Bribe.
- To offer, promise, induce, to give or authorize, direct or indirectly, Advantage Misconduct or Something of Value as a result of threats, blackmail, extortion and recruitment, except in cases where the life or safety of the Member is at risk.
- Finance, pay or sponsor the practice of acts illicit.
- Manipulate or defraud bids or administrative contracts.
- Use an intermediary to disguise or hide your identity and real interests Looking to practice of acts illicit.
- Hinder the investigation or inspection activity of bodies, entities or Agents public, or intervene in his performance.

CRB Members must always take a stand against acts of Corruption, even if the proposal be a solicitation in Agent Public, Third or in Client.

Case a payment forbidden need to be done for protect The integrity physics or The safety in a Integral, like in cases in kidnapping, per example, such payment he must to be promptly reported to your

direct Manager and the CRB Compliance Officer, who should provide at appropriate measures.

8.1 CONTRIBUTIONS POLICIES

Members are prohibited from promising, offering, authorizing or giving, directly or indirectly, contribution politics, for political parties or for candidates for public office with the resources or in Name of the CRB, in countries in that legislation forbid.⁴

Contributions policies include, but not if limit, The contributions monetary, The providing means of transport for candidates and their teams, offering spaces for meetings related to the electoral campaign, or the payment of printers to impression of material disclosure of parties and its candidates.

Members, in their own name, and in the exercise of their citizenship, are free to make contributions policies, us terms gives legislation place. Nonetheless, case O Knife, you Members gives CRB not should:

- declare that your own political contributions or opinions are related in any way anyway to CRB; and
- make or allow to make any disclosure that binds, in any way, the act in contribution to CRB.

8.2 RELATIONSHIP WITH AGENTS PUBLIC

The interaction of CRB Members with Public Agents or Politically Exposed Persons must occur ethically, with integrity and transparency and in accordance with the laws, regulations and best practices applicable.

Holding hearings or meetings with Public Agents to discuss contracts public, must be preceded by a formal written request. Applications must include, basically, the following information:

- Suggestion of date, schedule and place.
- Identification From Members who will attend the court hearing or The meeting.
- O subject that will be treated.
- if appropriate, the document which will be discussed.

At hearings and meetings with Public Agents must be carried out as a priority in organs, breakdowns or buildings public, in schedule commercial or during shifts duly provided for in the body's operating rules. These hearings and meetings formal should tell with the participation of hair any less 2 two) Members of CRB.

8.3 BIDDING AND CONTRACTS WITH MANAGEMENT PUBLIC

Due to the nature of its actions, CRB participates in bidding processes and signs contracts with the

administration public, direct or indirect.⁴

At the performance in your responsibilities, you Members gives CRB should observe at provisions of this Policy and The legislation applicable, acting in form ethic, full and transparent. Should, therefore, to have consciousness what not they can to practice acts what have likepurpose:

- thwart or defraud, through adjustment, combination or any other office hour, O character procedure competitive bidding public;
- Prevent, disturb or defraud The realization of acts in bidding procedure public;
- Remove or seek to remove a bidder, through fraud or offering an advantageof any kind;
- defraud bidding public or contract her due;
- Creating, fraudulently or irregularly, a legal entity to participate in a bidding process public or conclude contract administrative;
- Get Advantage Undue or benefit, so fraudulent, modifications or extensions of contracts concluded with the public administration, without authorization in law, at the act summons gives bidding public or us related instruments contractual; and
- Manipulate or defraud the economic-financial balance of contracts entered into with The management public.

In that sense, you Members of CRB not they can accomplish acts what may hurt you Principles gives isonomy and gives free competition, well like acts what may hinder activities in investigation or oversight of organs, entities or agents public.

Beyond From records accounting and financial appropriate, you responsible per lead or to participate in Law Suit bidding, contracts administrative or consortia constituted with these purposes must to maintain records written auditable of acts performed in such context.

The prohibitions listed in this item extend to the spheres of action of the administration public in scope national and International, including at companies controlled direct or indirectly fur power public and others entities or organizations international in nature public, The example of Bank World, of IDB-Bank interamerican in Development, and in other institutions financial similar.

8.4 RELATIONSHIP WITH THIRD PARTIES

IT'S strictly forbidden The use in a provider in services, agent, consultant, broker, intermediary, sales representative, reseller, distributor or other Third Party for the realization in unlawful acts, including pay or to offer bribe.

Third Party actions present specific risks, as in certain situations the Company and itsMembers may be held liable for inappropriate acts by a Third Party, eventhat no have knowledge.

CRB Members must never ignore information that suggests possible corruptionby third parties in Name from the company. The Members involved in the identification, evaluation and hiring in The 3rd should to be diligent and be attentive per example, but notif limiting, to the spots in attention below, related

⁴In Brazil, Law n° 13.165, of 29.09.2015, prohibited legal entities from making electoral donations.

The reputation, The qualification, to process of hiring and payment of third.

8.4.1 HOW MUCH THE REPUTATION

- O interest economic of third looks to be contrary or to be incompatible with The your contribution to Company.
- O third is engaged in activities illicit.
- O third is associate or known by use in companies of facade.
- O Third provides statements or information false, inconsistent incomplete or imprecise or if refusal to attend to procedures in evaluation and diligence.
- Requires confidentiality at the what if refers The your identity, beneficiaries finals or representatives, without justification reasonable.

8.4.2 HOW MUCH THE QUALIFICATION

- The Third Party is a Public Official, Politically Exposed Person or Close Relative of these.
- O Third It's recommended or required per a Agent Public or per who you have, director indirectly, any relationship in interest with Agent Public or People Politically Exposed.
- The Third Party does not present the facilities or qualifications to carry out the work for O which one would be hired.

8.4.3 HOW MUCH THE HIRING

- O third if refusal The firm contract per written.
- O third if refusal The to provide statements at the what if refers to Compliance.
- O third if refusal The to agree with controls internal.
- O Third requires remuneration in a level substantially higher to in market.
- O Third ask what O contract not describe with veracity you services what will be provided.

8.4.4 HOW MUCH TO PAYMENT

- O Third ask payments unusual, like payments in advance, commissions outside of the practice of market, or out of the country or for other Third.
- O Third ask payment for services vague or undefined.
- O Third ask payment without The documentation correct or for a I work what can not to be proven.

- O Third it presents values rounded and/or spending excessive for reimbursement.

CRB Members responsible for managing payments and accounting records, at CRB and in their Companies, must ensure that payments and transactions are documented, including information on O recipient and The nature of payment. Beyond from that, you Members responsible for processing From payments for agents and The 3rd should require information detailed related to the payments before gives Realization gives transfer.

In case of refunds to suppliers, CRB Members must request information detailed on The nature of payment before gives emission of the refund.

In all CRB's contracts with Third Parties, a clause to combat Corruption, whereby the parties must undertake to fully comply with the standards and laws in combat The Corruption applicable, including those in jurisdictions in what they are registered and gives jurisdiction in what O contract in question it will be fulfilled (case it is different).

CRB Members responsible for relations with the supplier must guarantee, in their contracting, that the right to carry out verification of its conformity is assured with the requirements contractual.

8.5 MERGERS AND ACQUISITIONS

Anti-corruption laws provide for situations in which the Company, as acquirer, may be considered responsible by the acts in corruption what have been practiced by companies and/or acquired businesses.

To consider and accomplish acquisitions, investments, joint ventures and others transactions, you responsible for subject matter at CRB should ensure The Realization in procedures adequate in evaluation and diligence on combat The Corruption, accounting, legal and in integrity of possible partner, in Agreement with one classification in risk proper, approved for Committee *Compliance* . O process in diligence he must help at the establishment of value fair gives company to be acquired.

The scope of due diligence on combating corruption must be adequate to the risk profile of the company to be acquired, and in between other aspects, may include:

- Identification of areas considered in high risk.
- O understanding of model in business gives company.
- THE realization of interviews with Administrators gives company.
- Researches in sources public for check The suitability gives company and in their Administrators.

9. PREVENTION THE WASH IN CASH

Money laundering is a process aimed at masking the nature and source of money associated with illegal activity, introducing these values into the local economy, through the integration of illicit money into the trade flow, in a way that appears to be legitimate or to that your true source or owner not may be identified.

Those involved in criminal activities such as bribery, fraud, terrorism, drug smuggling weapons and narcotics, try to hide the proceeds from their crimes or make them look like legitimate through in your “wash” in Business licit. Gives same form, O terrorismhe can to be financed per resources legitimate, at times called in wash in cash “reverse”, already what a business legit was used for finance one criminal activity.

You Members gives CRB should to accomplish at laws and regulations what treat in wash in cashand financing of terrorism in all the countries in which they operate. Money laundering and terrorist financing and its facilitation are strictly prohibited in any form or context. Violation of these laws can bring severe civil and criminal penalties to the Company is for their Individual members.

THE CRB only he must accomplish Business with The 3rd in Good reputation, including agents, consultantsand business partners who are involved in lawful activities and whose resources are source legitimate.

CRB's R-Compliance, in alignment with the *Compliance Committee* , must endeavor to ensure that there are appropriate procedures for prior assessment of Third Parties and Customers based on risks, as well as ensuring that reasonable measures are adopted to avoid and to detect payment methods suspicious, inappropriate, illicit or illegal.

THE follow some examples in signals in alert what help at identification in possibleindicative of suspicious activity related to money laundering or financing of the terrorism:

- One agent or a partner in Business what reluctant in to provide information complete, who provides suspicious, false or insufficient information, or who wants to evade From requirements of bookkeeping or in reporting.
- Payments made with monetary instruments that appear to have no link identifiable with a Third, or that no answer at practices of market.
- Payments deeds in cash per a third or a partner in Business.
- Amortization anticipated in a loan done in cash or equivalents in box.
- Orders, purchases, or payments that are unusual or inconsistent with O business or O business of Third.
- Exceptionally complex trading structures and payment patterns that not indicate clearly The goal of business, or have terms too muchfavorable.
- Transfers unusual in funds for or in countries not related with The transactionor what not be logic for the Third.
- Transactions involving locations identified like paradises tax or areas inknown activities terrorists, in traffic in drugs or washing of cash.
- Transactions involving shell banks or banks in tax havens, senders in cash or operators in exchange not graduates, or intermediaries financial notbanking.
- Inability or difficulty in verifying an entity's corporate history or the historical and the specialty in a individual.
- Publications negative at media or at community in Business place relative The integrity

or legitimacy of the entity or of the individual.

- Structuring in transactions in form The avoid O attendance to the requirements in bookkeeping or emission in reports, such like multiple transactions below From values minimum declarable.
- Requests for transfer in cash or for reverse deposits for a thirdor unknown account or not recognized.

10. GIFTS, GIFTS, ENTERTAINMENT AND HOSPITALITY

Every Team Member must act in the best interests of the Company, and must avoid activities that could create a real or perceived conflict of interest as an act improper to the relations of Business.

O receivment and/or O supply in gifts, gifts, entertainments and hospitality perMembers and in Members for any people It's discouraged. Still, Whennecessary or advisable, these can be offered or received, provided they are allowed for the legislation applicable and per it is Policy, and since what not be used with O objective into influence unduly decisions.

Gift is any item of modest value or of no commercial value that can be distributed toto meet at functions strategic in souvenir gives brand and/or acknowledgment, like per example, books, pens, notebooks, calendars and agendas, who have O soon Company.

Gift is any gratuity, favor, benefit, discount, or any tangible or intangible what you have value monetary. One gift also includes courtesies, meals, drinks, services, training, transportation, discounts, promotional items, lodging or gift.

Entertainment is any action, event or activity intended to entertain and arouse interest in one court hearing. Tickets in show, theater, exhibitions, concerts, events sports, social or others types similar in events open to public in general are considered entertainment.

Hospitality constitutes The structure and The network in services what they can to be necessary for enable, for example, invitations for entertainment, presentation of products, services or dependencies and participation in events promoted, supported or sponsored per oneEntity or for the Company. Are considered hospitality expenditure with Front desk, trip, ticket, accommodation, transportation, food, among others.

You Members should observe at rules The follow The respect in gifts, gifts, entertainment and hospitality without prejudice to others that may be defined through procedures specifics:

- Never you to offer, promise, to provide or receive, with O purpose in to influence improperly making decisions that affect the Company's business or for personal gain on one individual.
- Never offer, promise, provide or receive them with the intent to create or appear create any type in obligation or expectation manifests or latent, in any people.
- Observe The policy gives company of recipient how much The permission of receivment.
- To be reasonable about the value and The frequency.

- Be in Agreement with the laws and you mores recipient locations.
- Never offer, promise, provide or receive Gifts of cash or cash equivalents of any value, including but not limited to gift certificates, bonds and securities securities, discounts or financial compensation in personal transactions etc.
- Never to offer, to provide or to accept gifts or entertainment with connotation sexual, drugs or any type in items or activities illegal.
- never request or demand.
- THE expense corresponding to offering he must to be duly approved and reflected us books and Company records.
- All offer or receivment he must to be registered at form defined fur Responsible per Compliance of Company.

It is allowed to offer gifts that display the Company's name or logo with the purpose in to disclose O Name and brand. You gifts are intended The Customers, Providers and too much members' professional relationships. Gifts must not constitute form in gift, to give back or provide satisfaction in relationship strictly folks.

If receiving or rejecting gifts conflicts with traditions and culture location, it is advisable that said gift be accepted and that the matter be communicated to the Responsible per Compliance gives Company, in order to to give the due treatment.

having doubt how much to type in gift, gift, entertainment or hospitality what be likely to be received or offered within the scope of business relationships, in specific situations not mentioned, O Integral he must Consult O your manager direct, or O Responsible per Compliance of your Company, if required.

11. CONTRIBUTIONS BENEFICENTS

Contributions beneficent what aim to development cultural, Social, environmental or sporty and others gives same nature, offered The entities philanthropic or The others entities of the community, are allowed, provided that the criteria defined below are observed, and any applicable laws and regulations in force, and are not used as a means of to influence decisions business of manner inappropriate.

Members may only make charitable contributions on behalf of the Company When:

- be allowed by laws locations.
- be made later gives driving in one search reasonable what indicate what O recipient not proposed is associated direct or indirectly The an agent Public.
- be made for entities beneficent registered and in Good reputation.
- Not be made with O objective in get or retain some advantage or favoring business inappropriate.
- do not manage dependency for The continuity of beneficiary entity.

- Your goals for the entity beneficiary be clearly described and aligned with your CRB values.
- THE entity beneficiary formally declare like your resources donated will be used.
- be previously and formally approved for Principal President gives CRB or per who he delegate, and by the Committee of Compliance
- The beneficiary entity formally undertakes to account for the use of the resources.
- THE transfer in funds it is done for he counts banking in Name gives institution beneficiary.

12. SPONSORSHIP

Are allowed at next shapes of sponsorship:

- Sponsorships carried out by the Company itself for holding events or for the elaboration in products what encourage and what promote actions and expansion in knowledge cultural, social, environmental or sports. in these cases, your sponsorships must be approved by the Principal President gives CRB.
- Contributions given under The form in transfers in resources financial, products or services gives Company for people legal for The Realization in projects or events with commercial, technical and/or promotional purposes and which include, as a consideration, the activation and dissemination of the Company's brand, its products, services, projects or actions.

CRB Members responsible for this second type of sponsorship must ensure that such activities are carried out in a transparent manner, through a contract, for the purposes legitimate commercial purposes, and are in accordance with the consideration signed with the proponent of the event. One evaluation of value fair from market to O sponsorship it must be carried out and documented for responsible.

You responsible per these sponsorships should yet to secure what:

- be deeds later gives driving in one search reasonable what indicate that the entity director of the event not It's associate direct or indirectly to a Agent Public.
- be made for entities of branch and in Good reputation.
- Not be made with O objective in get or retain some advantage or favoring business inappropriate.
- THE transfers From resources it is done to bank account in Name of the entity director of event.
- be previously and formally approved for Principal President gives CRB or per who he

delegate, and by the Committee of Compliance

13. RECORDS ACCOUNTING

Accounting records are a tangible representation of CRB results. The integrity of these records is, therefore, a fundamental foundation of the reliability and transparency of the accounting of CRB.

THE CRB he must ensure The existence in controls internal what ensure The ready elaboration and reliability of your reports and demonstrations financial.

Legislation, standards and commonly accepted accounting principles must be strictly observed, in each place of operation, in order to generate complete, accurate records and reports complete and consistent what enable The disclosure and The evaluation of operations and results of each Company by shareholders, investors, creditors, government agencies and other interested parts and support The taking of decision by Managers.

Records accounting fake, misleading or incomplete are strictly prohibited. At information on The CRB should to be transparent, and be disclosed and affordable regularly in accurate and comprehensive way.

14. CONFLICT IN INTERESTS

In carrying out professional responsibilities and personal actions, CRB Members must ensure that there is no conflict or perception of conflict of interest. The conflicts of interests can arise in different ways and are, in general, easily perceived, and should be to be avoided.

You conflicts in interests occur When O interest private in a individual, or O interest of a Close Relative of this individual, interferes, or appears to interfere, with his ability to judgment free expected at your responsibility or us interests gives Company. You conflicts in interests also They emerge When a Integral or your Relative Next receive benefits personal inadequate by account of your position at Company.

If a Member or Close Relative is exposed to any of the situations below, he/she must dialogue with O your manager immediate for what both evaluate The existence or not in conflict real or potential, and like to deal with him.

- Possess any personal interests that may conflict or be interpreted like conflicting with Yours obligations professionals.
- Hold or acquire, directly or indirectly, interest in a competing company or in a business partner of the Company, with participation that allows exercising influence on the administration of this company.

Not It's possible identify all at situations or relationships what could generate a conflict or The appearance in a conflict in interests. Therefore, The peculiarity in each situation he must to be discussed in between O Integral and your direct manager, until let the doubt be healed.

Although this document does not mention all possible conflict situations, the following situations configure others common examples of potential conflicts:

- Have confidential information that, if used to make decisions, may generate personal advantages.
- Acquire, or intend to acquire, shares of Customers or suppliers of the Company with base on privileged information, or to provide such information The The 3rd.
- Accepting an external role, task or responsibility of a personal nature that may to affect your performance and productivity at Company or what help activities in competitors.
- To accept a office, assignment or responsibility or receive any type in remuneration in a Customer, supplier or partner of the Company, if this could affect the relationship of Business of the Company with they.
- To accept a office, assignment or responsibility or receive any type in remuneration in a competitor from CRB.
- Directly or indirectly hire Close Relatives, or influence that another Integral you hire, outside From Principles settled down in competence and potential.
- Use you resources of CRB to attend to particular interests.

15. RESPONSIBILITY SOCIAL

Members should comply with your responsibility fundamental social through of work carried out with productivity, with the provision of good services and the supply of quality products, complying with legislation, avoiding waste, respecting the environment environment, you cultural values, the rights humans and The organization Social in the communities.

So, satisfy their Customers, create opportunities in I work, contribute for O sustainable development of the countries and regions in which they operate and generate wealth for the society.

The voluntary participation of CRB Members in community actions should be valued. In these actions, O Integral what Wish use time and resources gives CRB he must to do with approval Preview of your Direct manager.

16. EXERCISE OF RIGHT POLITICAL

According to its principles and concepts, the CRB does not adopt a political party position, and, therefore, he must to be preserved gives action policy in their Members. Therefore, you Members are forbidden in link the CRB to activities political parties.

Consequently, not It's allowed accomplish activities partisans or raise wishes, direct or indirectly, in establishments or through means of communication owned by CRB.

However, CRB Members must respect the choices and personal exercise of citizenship of the other

Members, including the free expression of thought and the option individual in participation policy, affiliation partisan and application The positions public or politicians.

You Members who choose for running for political office or public, or want express themselves politically and publicly outside the CRB, they must not take advantage of the position that occupy, nor use any resources or means of CRB and its Companies, but move away of your activities, untying gives CRB.

17. ACTIONS DISCIPLINARY

The Member who violates the provisions of this Policy, fails to comply with the law or any Policy or CRB procedure or allow a Member of your team to do so, or even if you know in some violation and leave in report it, it is subject The action disciplinary proper, until same Theresignation.

Retaliation or any attempt to prevent, obstruct, or dissuade Members of theCRB in their efforts to report what they believe to be a breach of commitment here defined, what is constituted also in reason for one disciplinary action, including dismissal.

THE to depend gives nature gives violation, also he must to be evaluated The obligatoriness or The convenience of reporting the violation to authorities or third parties, which may result in other sanctions.

GLOSSARY

“Administrator”, “Administrators”: When in the singular, it means the statutory directors and members of Advice in Management gives Company referred individually. When at the plural form, you directors statutory and members of advice in management gives company referred jointly.

"Agent Public": Any individual what i.e. agent, authority, employee, server, employee or representative in entity governmental, organ, Department, agency or craft public, including any entities From powers executive, legislative and judiciary, entities gives management public direct or indirect, companies public, societies in economy mixed and foundations public, national or foreign; people exercising, yet what temporarily and without remuneration, office, occupation or job in entity in a state sovereign and your instrumentalities, including entities what pay services or serve The one occupation public; principal, advisor, Integral or representative in one organization International public; principal, adviser or employee of political party, as well as candidates running for elective or political public office; member in one family real, including people what not have authority formal, but may to influence in interests business; and spouse or other Relative Next in a Agent Public.

"Stuff) in Value": Any types in offers non-financial and financial like, per example, cash, gifts, meals, entertainment, transport, favors, services, loans, guarantees, O use gives property or equipment, offers in job or Internship, donations or favorable opportunities, political or charitable contributions, changes in conditions commercials, discounts, reimbursement or payment in expenditure or debts, in between others,

provided, directly or indirectly, to individuals who may benefit from business with the Company or same to one Relative Next or associate The such people.

"Control" or "Controller": It is characterized for power effectively used in to drive at activities corporate and guide O operation From organs gives respective society, in form direct or indirect, in fact or in right. There is presumption relative in ownership of control in relationship The people or group in people linked per Agreement in shareholders or under control holder of shares that have assured him an absolute majority of the votes of the shareholders gifts in the three latest assemblies general gives society, yet what not it is holder of actions what you ensure the majority absolute share of the voting capital.

"Controls": Mechanisms that minimize the possibility of risks occurring or mitigate your impact on business.

"Corruption": Abuse in power or procedure for benefit folks or dishonest. THE Corruption can take many forms, such as Bribery (kickback, payment of facilitation, political and charitable donations, sponsorship, giveaways, gifts and Entertainment) conflict in interests, collusion (manipulation in proposals, cartels and fixation in prices), patronage, agency of illegal information, use of privileged information, tax evasion, in between others.

"DP-CRB": Principal President gives concessionaire Route of Flags SA

"Company": concessionaire Route of Flags SA

"Extortion": Practice in threat would be and imminent The integrity physics in a individual or in a active, used for get cash or other things from Value.

"FCPA": American anti-corruption law that defines as a crime not only the payment of bribes itself, but also any payment made directly or indirectly by a company listed on the US stock exchange that is not duly and clearly registered and need.

"Influence Significant": O power in to participate in the decisions financial and operational in one entity, but that does not necessarily characterize control over these policies. Influence Significant can be obtained through corporate participation, statutory provisions or shareholders agreement.

"Members": All at people what work and what integrate The Company, be advisors, directors, professionals in any nature, interns and apprentices.

"Manager": all Integral who leads one team.

"Line in Entrepreneurship": At macrostructure gives Organization, The Line in Entrepreneurship unites Customers with Shareholders and is made up of the Managers directly responsible for obtaining the simultaneous satisfaction both.

“Monitoring” “Monitoring”: Ensuring that the matters in question are carried out by related responsible, in Compliance with relevant provisions.

“Close relative”: Any son and daughter, stepson and stepdaughter, father and mother, stepfather and stepmother, spouse, brother and sister, father-in-law and mother-in-law, son-in-law and daughter-in-law, brother-in-law and sister-in-law, and anyone who live in same home, except tenants and employees.

“Politically Exposed Person”: Persons who exercise or have exercised any position or function public relevant and yours Relatives Upcoming, in defined period at legislation applicable.

"Program in Action", "SHOVEL": Agreement agreed in between manager and Led what define at responsibilities of the Team Member and the Manager's commitment to monitoring, evaluating and judgment of Led with based on your performance.

"Scratches": O It is made gives uncertainty at Realization From goals gives Company, characterized per a Detour in relationship to expected, positive and/or negative. O risk It's lots of times express interms of a combination of the consequences of an event and the probability of occurrence associated.

“Bribery”: The act of promising, offering, giving, requesting, authorizing or receiving money, gifts, Thing in Value, Advantage undue, or any type in offer carried out, direct or indirectly, like form in induce The practice in any act, omission, influence or Undue advantage, dishonest or illegal act, or a breach of trust in the performance of functions of a individual

“Third Party”: Means any natural or legal person who acts on behalf of, in the interest or for the benefit of the Company, provide services or provide other goods, as well as partners commercials what pay services The Company, directly related The obtaining, retention or facilitation in Business, or for The conduct of affairs gives Company, including, without limitation, any distributors, agents, brokers, dispatchers, intermediaries, partners in jail in supply, consultants, resellers, hired and others providers in services professionals.

“UK Bribery Act ”: this law was signed on April 8, 2010 and took effect on July 1 from 2011. IT'S a "Act" what Visa bring O Kingdom United to fulfillment of a law International inanti-bribery , which makes it a crime to give or receive bribes. This act also introduces this crime to institutions that fail at prevention of bribes.

“Improper Advantage”: Any private advantage, payment or benefit, whether direct or indirect, tangible or intangible, the what one people not have right.