



CODE OF ETHICAL CONDUCT  
FOR SUPPLIERS

November 2021

Dear Partner,

The present Code of Ethical Conduct for Suppliers is intended to set forth the rules that will govern the ethical and socio-environmental conduct of our suppliers, in their relations with BRK Ambiental Participações S.A. (“Company” or “BRK”) and companies controlled by or affiliated to it, each one of them called, hereinafter, the “Company”. Aspects presented here are directly aligned with the Code of Ethical Conduct of Company’s Employees. That is, aligned with everything that we truly believe to be part of a responsible and transparent way of acting.

We, through the present Code, are reaffirming our commitment to operate under the highest ethical standards. We abide a set of principles which, among other things, guide us in order to always make our business and all our relationships based on integrity and full commitment to all laws and regulations applicable.

It’s essential, for us, to maintain such reputation, in our business, and that’s why we maintain a zero-tolerance approach, as regards actions of corruption, discrimination and unethical behavior.

The present Code of Ethical Conduct for Suppliers defines responsibilities and the expected conduct of involved parties, which are so important to the Company and the society, and which also reflect our way of doing business.

Our intention is to meet the legitimate interests of the parties involved in such relationship, so we make available a Confidential Channel for reporting of situations of breaching this Code, in a confidential and, if desirable, anonymous manner.

The Company is sure that it can count on your essential support and effective participation, for strict compliance with these guidelines.

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## **1. INTRODUCTION**

The purpose of the present document is to set forth his guidelines that shall guide the ethical and socio-environmental conduct of Company Suppliers.

It is worth to highlight that the selection and conservation of Suppliers contracted by the Company lies exclusively on technical, financial, quality-related, socio-environmental criteria and those related to faithful compliance with the laws in effect.

## **2. PURPOSES AND VALUES**

BRK is one of the largest private sanitation companies in Brazil, maintaining investments in more than 100 municipalities in the country and providing services that benefit more than 16 million people.

The exercise of the Company's activities and relationships with its different audiences is based on the following values:

- Act with integrity;
- Act with security;
- Ensure operational excellence;
- Commitment to the customer;
- Results orientation; and
- Respect for people.

## **3. COVERAGE**

The present Code of Ethical Conduct for Suppliers ("Code") is applicable to any service provider, supplier, advisor, client, business partner, third party contractor or subcontracted party, lessee, commercial space assignee, whether natural persons or legal entities, regardless of formal contract or not, including those using the name of the Company for any purpose, providing services to it, supplying materials to it, interacting with public officers, the government or third parties in name of the Company to perform the contracted business (all of these defined together, in the present Code, as "Suppliers").

## **4. COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

The Suppliers shall comply with all laws, rules and regulations in effect. This will include, without limitation, the respect for the health, safety, human rights, labor rights, the environment and local laws, including taxation, tax and anti-corruption laws; as well as those that applies specifically to public companies, asset managers and investment advisors, including laws with broader application such as prohibitions on the misuse of insider information and other sorts of market abuse.

Failure in knowing the laws, rules and regulations in general is not an excuse to justify a violation of such rules. We hope that you can make your best efforts in order to familiarize yourself with the laws, rules and regulations that may affect your activities, and comply with it.

***Do not negotiate, offer, promise, take, facilitate, pay authorize or give bribery, including “facilitating payments”.***

We value our reputation for conducting our business with honesty and integrity. It's essential to maintain such reputation, since it's a trust generator, in our businesses with clients, shareholders, investors, suppliers, competitors and others, which is good for business.

We do not negotiate, offer, promise, get, make available, pay or authorize bribing to improve or assure out activities, directly or indirectly, and you are not allowed to do it or authorize third parties to do it in name of the Company.

De do not adopt, encourage or allow the practice of any conduct that can be considered as or result in detrimental acts against the Public Administration, both domestic and foreign, as provided for by the law.

We have zero tolerance policies, as regards situations of bribery and other acts of corruption. This commitment to honest and integrity comes from the highest levels of our Company, and we hope that our Suppliers can also meet such same high standards, as well.

In this sense, the Company also expects its Suppliers to conduct their activities in strict compliance with the laws that prohibit corrupt practices, including Law No. 12846/2013 (“Anti-Corruption Law”), Law No. 8429/1992 (“Improbability Administrative Law”), Law No. 9613/1998 (“Money Laundering Law”), Law No. 12529/2011 (“Competition Defense Law”), Law No. 14133/2021 (“New Bidding Law” ) and its future changes.

Bribery is anything of value that is offered, promised, given or received to improperly influence a decision or to obtain undie or unfair advantage for the purpose of promoting, valuing, obtaining or retaining business. Bribery does not always occur through cash payments and may take other forms, including gifts, travels, hospitalities, political contributions, charitable donations, employment opportunities, internships, and temporary jobs. Facilitating payment<sup>1</sup> is also a form of bribery, being prohibited, therefore.

***We must prevent the use of our operations for purposes involving money laundering or any other activity that can facilitate money laundering, terrorist financing or other criminal activities.***

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<sup>1</sup> ‘Facilitating payments’ are payments made to secure or to speed-up routine actions or to induce public officers or third parties to perform the routine tasks that they are required to perform, such as issuance of licenses and immigration controls or clearing goods retained in customs. This do not include official, mandatory or administrative fees formally imposed and tabled by government agencies to expedite the service. The Suppliers are not allowed to make any facilitating payment and shall ensure that no such payments are made in our name, by third-parties, including agents and other advisors.

The Company is strongly committed to preventing the use of its operations for money laundering, terrorist financing or other criminal activities and will take suitable measures to comply with the Brazilian and international anti-money laundering laws. We are zero tolerant to money laundering.

Some jurisdiction may disclose lists of individuals and organizations to whom and to which the Company is prohibited from get or give resources, according to the anti-money laundering laws. The Suppliers shall be reasonably careful, in order to ensure that they will have no relations with third parties controlled or acting on behalf of individuals, entities and organizations subject to restrictions imposed by some jurisdictions. This will include requesting from such third parties the submission of declarations stating that they are compliant with anti-money laundering practices and are not subject to restrictions included in documents to be entered with the Company.

## **5. RELATIONS WITH SUPPLIERS**

Our Suppliers exert direct influence over the quality of our products and services. Therefore, we prize such partnership relationships, taking in consideration the best for all those involved.

Relationships with our Suppliers will be characterized by the observance to the provisions set forth in this Code. The Company primes for free competition, transparency and impartiality, when contracting its Suppliers, as well as strict compliance as regards the contracts.

The Company encourages its Suppliers:

- a. To suitably fulfill and monitor their value chains related to prevention and fighting against forced or compulsory and/or child labor, pedophilia, discrimination, moral and /or sexual harassment, tax evasion, corruption and money laundering;
- b. Maintain applicable internal policies and/or social inclusion programs, codes of ethical conduct, corporate responsibility codes, policies related to environmental management or minimization of environmental impacts related to their business, and actions that may promote the valorization of diversity, equity and qualification, for employment of disabled persons and apprentices, as well as free association;
- c. Manage their supply chain, identifying critical suppliers, from a sustainability point of view and setting goals for improvement of economic, social and environmental indicators, before such group of suppliers;
- d. Include economic, social, labor, tax and environmental risk management in their supply chain, aiming suitable business continuity;
- e. Encourage, both internally and among its supply chain, the contracting of local small and medium suppliers, for economic development;
- f. Maintain and recommend its suppliers to maintain a code of ethical conduct,

regarding to their personal and commercial relationships;

- g. Undertake and recommend to their suppliers the timely and correct payment of respective obligations with Employees, practices intended to assure salaries that can meet the minimum standards for the class, in the region, enough to fulfill their basic needs and to assure suitable conditions of health and safety, as provided by law, to Employees and third-party workers, as well as to provide timely and correct payment of their obligations related to tax, labor and social security.

The Company hires Suppliers whose management practices are adherent to the precepts of the present Code, permanently aiming the expansion of its supply base, without restricting suppliers by their size or location, provided they are in conditions of offering their products or services in conformity with the disclosed needs and specifications, and are qualified to supply, under an administrative point of view.

The Company follows-up the development and performance of its Suppliers. This evaluation is intended to support the improvement of management and to strength the partnership relations between the Company and its Suppliers.

Therefore, it is important that the supplier can contribute with the Leader of its contract, granting information and facilitating visits to its company, in previously agreed times and dates.

## **6. EMPLOYEES DEVELOPMENT**

It is important that Suppliers can seek the improvement of its employees, through work qualification efforts and encouragement for improvement of their levels of education, as we believe that education can accelerate and leverage the social ascending of people, as well as the quality of the product or service provided.

## **7. POSITIVE WORK ENVIRONMENT**

It's primordial that our Suppliers establish a positive work environment where all employees feel respected and productive.

Integrity, honesty and respect are fundamental principles of the Company, that expects that Suppliers maintain its commitment to a positive, open and inclusive work environment, free from discrimination, violence and harassment.

## **8. UNFAIR COMPETITION**

The Company prizes free and fair competition among its suppliers, and therefore we do not condone with the following practices:

- a. Offering better prices, at the expense of nonconformity with the legislation in force (labor laws, tax laws, etc.);
- b. Making insinuations or comments that may affect the image of competitors;

- c. Collaborating for formation of trusts and cartels;
- d. Performing or taking advantage of any kind of fraud and/or corporate espionage;
- e. Performing or contributing to coercive business practices and abuse of economic power;
- f. Offer or give bribes, extort or make facilitating payments in order to speed-up any action in its own behalf; and
- g. Any other practice that fails to guarantee an ethical and fair competition.

The Company respects its competitors and believes that a faithful competition contributes for market improvement.

## **9. CONFLICT OF INTERESTS**

It will be essential that personal interests cannot conflict with the interests of the Company or third parties. A conflict of interests situation may occur, for example, but not limited to:

- a. Activities – professional or not - performed by Company Employees to Suppliers;
- b. Private relations of Company Employees with Suppliers, compromising the impartiality in the business;
- c. Use of privileged information, by the Supplier, for purchase and selling of securities of the Company;
- d. Kinship up to second degree with Company Employees and/or respective spouses<sup>2</sup>. A possible existence of kinship must be formally communicated to the Compliance Area, in order the conflict of interests can be analyzed, before the formalization of any commercial agreement.

These and other situations shall be immediately reported to the Compliance Area in order to be suitably evaluated, and to confirm or not the characterization of a conflict of interests. Until conclusion of the evaluation, the parties involved in the potential conflict shall be totally removed from the situation.

## **10. GIFTS, PRESENTS, ENTERTAINMENT AND HOSPITALITIES**

Gifts, presents, entertainment and hospitalities given to or received from persons maintaining commercial relationships with the Company are generally accepted, if modest and suitable to the commercial relation, and not suitable to create an idea of inadequacy. No payments in money shall be made or received. In addition, nobody shall give, offer, promise, receive, provide, pay or authorize gifts and entertaining to

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<sup>2</sup> Relatives and/or Kinship Relationship – The following family members are considered relatives: spouse/partner, grandparents, parents, children, siblings, nephews and nieces, first cousins, grandchildren, uncles and aunts, brothers-in-law and sisters-in-law, father-in-law and mother-in-law, stepchildren, daughters-in-law and son-in-law.



get an undue advantage.

The Company hopes that its Suppliers, before offering a gift, present, entertainment or hospitality make sure they are in accordance with usual practices of the market and legal requirements, in order to avoid situations that may configure an inappropriate behavior.

## **11. SOCIAL NETWORKS**

The Suppliers and respective employees, when acting in social networks, shall respect the values of the Company and the present Code, when mentioning the Company or referring to any of its Employees or third-parties.

## **12. ENVIRONMENTAL, SOCIAL AND GOVERNANCE MANAGEMENT (“ESG”)**

We adopt ESG criteria in all our operations to ensure that our business model will be sustainable in the future. These include, among others:

- a. ensure the well-being and safety of Employees;
- b. act properly in the communities in which we operate;
- c. mitigate the impacts of our operations on the environment; and
- d. conduct business to the highest ethical and regulatory/legal standards.

We also incorporate ESG criteria in conducting due diligence procedures, including, among others, issues related to anti-bribery and corruption and health and safety, in order to assess material issues related to ESG, possible risks and potential mitigation strategies.

## **13. HUMAN RIGHTS**

The Company respects and promotes the human rights, in all its activities, and endeavors to establish a cordial, trustful and respectful relationship, as well as a noble and honest conduct in the relations between its Employees and the Suppliers employees, irrespective of hierarchical position, job or function.

### ***Harassment and Discrimination***

The Company does not tolerate discrimination<sup>3</sup>, violence<sup>4</sup>, and harassment<sup>5</sup>, whether moral, sexual, religious, political or organizational nature, in the workplace. The Suppliers must assure a safe and respectful environment, prizing the equality, justice and dignity.

The Company hopes that its Suppliers can monitor potential nonconforming situations and treat it accordingly.

***Commit yourself to assure health and safety in the work environment***

In the Company's understanding, safety is an essential value which shall guide all attitudes, behaviors and decisions, in our daily life. People are the main link maintaining the Company on the path of corporate excellence. Therefore, caring for its safety and welfare will be always fundamental. Thus, the Company Suppliers shall:

- a. Provide decent working conditions to their employees, as regards workload and health & safety, always respecting the applicable labor laws.
- b. Provide a work environment with suitable physical and psychological conditions for development of Employee's activities
- c. Strictly obey all laws, regulations and procedures concerning to health and safety at work;
- d. Do not engage in dangerous or illegal behaviors, including actions or threats of violence;
- e. Do not carry, distribute or be under influence of illicit substances, while in the premises of the Company or conducting business for it; and
- f. Do not carry or use any kind of weapon or inflammable material in the premises of the Company, unless expressly authorized, due to activities performed in the Company or in events sponsored by it.
- g. Knowing and practicing the Company's guidelines regarding health & safety, as follows:

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<sup>3</sup> 'Discrimination' means unequal or differentiated treatment of an individual or group based on prescribed characteristics protected by law, including the denial of opportunities and harassment. Prescribed Characteristics typically include age, color of skin, race, religion, gender, marital status, family conditions, sexual orientation, nationality and disability. It does not matter whether the discrimination is intentional, but rather the effect of behavior.

<sup>4</sup> "Violence" in the workplace generally means the exercise of physical force by a person against an Employee that cause or could cause harm, physical injuries or illness. It includes an attempt to exercise physical force against an Employee that could cause harm, physical injuries or illness; and a statement or behavior that an Employee could reasonably interpret as a threat that could cause harm, physical injuries or illness.

<sup>5</sup> "Harassment" generally means any offensive verbal or physical conduct, segregating a person against his/her will. It includes a wide range of behaviors, from direct sexual approaching to insults, offensive jokes or debauchery. Harassments can occur in many ways and, under some circumstances, may be not intentional. Irrespective the intention or not, harassments of any kind affect or may affect, in a negative manner, the individual professional performance or the work environment as a whole, and is not tolerated.

- Communicate and remedy any risk scenario, as soon as identified;
- Release a Work Permit in the worksite, when applicable, and implement all required safeguards;
- Only perform activities under safe conditions and refuse to perform the work, in case of signs of lack of safety;
- Perform all activities with suitable Individual Protection Equipment (“IPE”) and tools;
- Assure that critical activities can be performed only by qualified and capable persons;
- Assure suitable insulation and blockage of dangerous energy sources;
- Assure that safety or alarm systems can only be deactivated upon formal authorization; and
- Record, communicate and provide investigation for 100% of the accidents, as well as all the incidents considered as a high potential of severity.

### ***Human Rights and Modern Slavery***

The Company is committed to conducting business in an ethical and responsible manner, including the conducting of activities in ways that respects and supports the protection of human rights through:

- a. elimination of discrimination at work;
- b. Prohibition of child labor and forced labor; and
- c. Eradicating harassment and physical and mental abuse in the workplace.

The company condemns slave and child labor, sexual exploitation of children and adolescents and traffic of people.

The Company expects that its Suppliers can monitor their value chain in order to prevent and fight against such situations. We will not accept such practices, which, if identified, will be suitably reported to the applicable authorities.

The Company will not enter in commercial relationship with Suppliers utilizing irregular and/or illicit practices involving de slave and child labor, sexual exploitation of children and adolescents and human trafficking.

The Company expects that its Suppliers:

- a. Do not employ less than 18 (eighteen) years old adolescents in places that may be harmful to their physical, psychic, moral and social development, as well as in dangerous or unhealthy places and jobs, in working hours that can restrain the attendance to school and also in night shifts, according to the specific legislation;
- b. Do not adopt labor practices similar to slave work, or illegal children and adolescent labor, for fulfillment of the present contract [SIC];
- c. Do not hire workers under the age of sixteen years old, except as apprentices, from the age of fourteen on, pursuant to Law 10.097 of December 19, 2000 and

the Consolidation of Labor Laws and other laws regulating the matter;

- d. Not tolerate any form of discrimination, violence or attack against fundamental rights of children and adolescents and also condemn any person that may produce, reproduce, record, by any mean, scenes of explicit sex or pornography involving children and adolescents and/or any person who may agency, facilitate, recruit, coerce or mediate the participation of children and adolescents in such scenes.
- e. Not allow the exploitation of underage persons in its value chain, and not accept the use of products and/or services by customers that may exploit such activity. Any Supplier having direct or indirect involvement with this kind of situation will be discredited and reported to the competent authorities.

#### **14. ENVIRONMENT**

The Company has an active participation in the protection of the ecosystems where its industrial plants are located and supports several public and private projects related to the preservation of the environment. Such participation is made through great zeal and care in the manufacture, handling and transportation of its products, preservation of forest reserves, prevention of natural resources wasting and promotion of campaigns of preservation to raise awareness among the regional communities. Therefore, the Company hopes that all Suppliers:

- a. Can respect and fulfill all provisions of the environmental laws in force, assuming responsibility, before the environmental agencies, for any loss or damage that they may cause to the environment, as well as to perform their services and/or activities respecting all the legal, normative, administrative or correlated acts emanating from the Federal, State and Municipal spheres, including, without limitation, the compliance with Federal Law No. 6.938/81 (National Environmental Policy), Law 9.605/98 (Law of Environmental Crimes) and Law 12.305/10 (National Policy of Solid Wastes), also implementing efforts, in such aspect, within their respective representatives and products/services suppliers, in order these can also commit themselves to join efforts to protect and preserve the environment, and also prevent themselves against practices that can be harmful to the environment. The certification of environmental management systems is seen as a good management practice and its implementation is widely recommended;
- b. Become familiar with all procedures adopted by the Company, as regards the environment, and fulfill it, where applicable;
- c. Identify hazards, assess risks and, where required, communicate the Company, before taking corrective and preventive measures;
- d. Immediately report any accident and/or incident related to the environment (such as leakages or emissions out from the standards if compliance) to the Company and to the public authority in charge in the place, in order to enable suitable investigation of the causes and initiate the corrective and preventive measures; and
- e. Contribute to an ecologically sustainable development, by continually seeking to

reduce the environmental impact of its resources, operations, products and services.

## **15. POLITICAL ACTIVITIES AND FREE ASSOCIATION**

The Company is non-partisan and respects the individual rights of Employees and Suppliers, as regards their political involvement and their involvement with trade unions. Therefore, the company expects that its Suppliers can recognize the freedom of association, as well as e collective bargaining agreements and negotiations.

## **16. LABOR PRACTICES**

### ***Wages and Benefits***

The Company Suppliers shall compensate their Employees and provide all benefits granted by law. They also shall ensure the selection of commercial partners that can operate in conformity with the labor laws in effect in the place of performance, and under ethical standards compatible with the premises defined herein.

## **17. SECRECY AND CONFIDENTIALITY**

The Company expects that all company-related matters, without exception, can be treated by its Suppliers with secrecy, confidentiality and protection of intellectual property rights of the Company. Access to Company's information shall be limited to those in need of receiving the information, who shall only use it for specific purposes of the applicable supply or service provision.

The Suppliers shall treat as confidential any non-public information received from the Company, complying with any data protection legislation, through any mean or form, including, but not limited to personal or financial information, during the preparation of their proposals and during the lifetime of their contracts and/or proposals. Confidentiality shall be indefinitely extended after termination of their contracts or until a possible public disclosure of such information.

### ***Security of information***

In the Company, internal and external information are treated with extreme care. Therefore, it will be required that the information is stored, conducted and processed in a secure environment, and that all those involved can share the responsibility for the security processes and assure the integrity, availability and confidentiality of the information assets.

Scopes of products, services and strategies which can be disclosed to our Suppliers shall be treated in a confidential manner and shall not be disclosed, displayed or transferred to third parties without prior consent, in writing, by the Company.

## **18. TRANSPARENCY OF INFORMATION**

Transparency is a fundamental component in any relationship involving the Company. Transparent behavior can be understood as:

- a. Clarity and transparency in the information required for quotation, contracting, purchasing and administration of products and services;
- b. Veracity of legal, tax-related, economic-financial information, as well as any information related to health & safety, environment, quality, professional qualification, among other information existing in the relationship with our company;
- c. Clear manifestation of opinion, regarding to practices that can result in the best provision of services, avoiding inducement to errors;
- d. Ability to perform the contracted services, as regards to acquired information, knowledge and skills; and
- e. Adoption of good corporate governance practices, assuring equity, accountability, transparency and responsibility for results.

## **19. VOLUNTARY COMMITMENTS**

The Company encourages its Suppliers to become signatories and/or to incorporate to their business practices the premises established by agreements, treaties, pacts or conventions promoting a sustainable development, such as:

- UN's Universal Declaration of Human Rights;
- UN's Sustainable Development Goals (SDG);
- Global Pact;
- International Labor Organization (ILO);
- Business Pact for Integrity and Against Corruption;
- National Pact for the Eradication of Slave Labor;
- Corporate Pact Against the Sexual Exploitation of Children and Adolescents on Brazilian Roadways;
- Child Labor Eradication Program.

The Company also encourages its Suppliers to contribute to the social, economic and environmental development of Brazil.

## **20. REPORTING OF DEVIATIONS**

The Company asks its suppliers to be proactive and immediately report any violation or suspected violation of this Code or any illegal or unethical behavior to their

knowledge through the Confidential Channel, by the website ([www.canalconfidencial.com.br/brkambiental](http://www.canalconfidencial.com.br/brkambiental)) or by phone 0800 777 8006.

The Confidential Channel is managed by a third-party company, independent from the Company, therefore assuring the confidentiality and, if desired, the anonymity, for reporting unethical, illegal or inappropriate behavior. Confidential Channel's phone operates 24 hours a day, 7 days a week, as well as the website. If you choose to file an anonymous report, anonymity will be ensured, as provided by applicable legislation.

***All reports and claims will be kept confidential and will be treated accordingly.***

You can make an anonymous report or complaint, through the available channels; but you can also choose to identify yourself to facilitate the investigation. The secrecy of denouncements reported will be ensured, however compatible with the needs to carry out a proper investigation and according to the law.

***The Company prohibits retaliation against any person for making a report or complaint in good-faith of a violation of this Code or any law or regulation.***

No retaliations will be taken against the person who has reported or filed a complaint in good faith, and with reasonable conviction that a breach against the present Code, or any other law or regulation has been, is being or will be committed; However, making a report will not absolve you (if you are involved) or any other person from responsibility, in case of breach or suspect of breaching to the present Code. The Company reserves the right to apply legal measures if you make a false report, providing false information or make an accusation that you know to be false. This do not mean that the information provided shall be correct, but it means that you must reasonably believe that the information is true, and that it represents at least a possibility of potential breach to the present Code.

If you understand that you are experiencing reprisals after your complaint, you must file the retaliation through the Confidential Channel itself.

## **21. LEGAL MEASURES FOR BREACHES TO THE PRESENT CODE**

The Company reserves the right to take appropriate legal measures against breaches to the present Code. In more severe cases, the actions may result in termination of the contracts made between the parties, and, as the case may be, legal measures can be taken against you.

## **22. CHANGES**

The Company's Board of Directors reviews and approves this Code at least once a year and is ultimately responsible for monitoring compliance with this Code.

## **23. NOTICE TO THE READER**

The Company reserves the right, in whole or in part, to modify, suspend or revoke this

Code and any related policies, procedures and programs at any time. The Company also reserves the right to construe and amend the present Code and its policies at its sole discretion. Any changes to this Code will be disclosed and reported as required by law.

This Code is disclosed in our website. The version of the present Code disclosed in our website may be more updated and supersedes any printed version in case there is any discrepancy between the printed version and the one available on our website.