

ANTI-BRIBERY POLICY

This Anti-Bribery Policy is intended to establish the organization's responsibility to avoid or mitigate the costs, risks and damages of engaging in bribery, to promote trust and security in business transactions and to maintain its reputation.

The Anti-Bribery Policy is also applicable to third parties linked to the organization, who must adhere to its principles.

Failure to comply with the laws dealing with acts of bribery related to management and assets may result in serious administrative and financial penalties for the Company, its directors and employees and third parties involved.

“Bribe” is understood as the offer, promise, delivery, acceptance or solicitation of an undue advantage of any value (which may be of a financial or non-financial nature), directly or indirectly, and regardless of its location, in violation of the applicable law, as an inducement or reward for a person (natural or human) to act or refrain from acting in connection with the performance of that person's obligations.

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This Anti-Bribery Policy establishes the following as mandatory compliance premises, which are maintained and reviewed by Senior Management:

the strict prohibition of bribery in any activity directly or indirectly related to the company, and compliance with anti-bribery regulations;

the establishment of a reference framework for the ANTI BRIBERY SYSTEM, ensuring the suitability, , effectiveness and continuous review of the system;

promote the approach, without punishment, discrimination or disciplinary measures, for the complaints of actual intent or suspicion of possible bribery;

ensure the commitment to continuous improvement of the system;

granting authority and independence for the compliance manager of the ANTI BRIBERY SySTEM .