

**OBJECT: STANDARDIZATION OF
NOVA PARTICIPAÇÕES**

**TITLE: INTEGRITY POLICY
RELATIONSHIP WITH PUBLIC POWER**

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INDEX	PAGE.
1 - OBJECTIVE	4
2- COMPLEMENTARY RULES	4
2.1- From Nova Participações	4
2.2- National	4
2.3- International.....	4
2.4- Terms and Definitions.....	5
3- COVERAGE.....	6
4- DESCRIPTION.....	6
4.1- General Guideline.....	6
4.2- Specific Guidelines	7
4.2.1- Public x Private Conflict of Interest.....	7
4.2.2- Gifts, Gifts and Hospitality	7
4.2.3- Facilitation Payments	7
4.2.4- Meetings with the Government.....	8
4.2.5- Tenders and Public Contracts	9
4.2.6 - Inspection of Public Authorities	10
4.2.7- Obtaining Licenses, Authorizations, Permissions and Certificates	10
4.2.8- Hiring Agents and Former Public Agents.....	11
4.2.9- Transactions with intermediaries	11
4.2.10-For more information on this topic, see item 4.2.2 - Use of Agents and Third Parties of the M0-PC-0009.	12
4.3- Communication, Training and Questions	12
4.4- Ethics Channel	12
4.5- Investigations and Sanctions.....	12
4.6- Responsibilities.....	13
5- VALIDITY 13	
ANNEXES	
ANNEX I - SPECIFIC GUIDELINES FOR PARTICIPATING IN BIDDINGS	

1 - OBJECTIVE

This Policy aims to reaffirm the integral and transparent posture of the Nova Participações Group, in its relationship with the Government, defining the conduct that must be adopted by its employees, partners, executives, administrators, commercial and business partners and other people, physical or legal, regardless of hierarchical level, who act on your behalf, when in contact with public agents, national or foreign, and persons linked to them, directly or indirectly.

In addition, it aims to demonstrate that the occurrence of situations, conduct and unlawful acts against the Public Administration that can be characterized as corrupt practices, as defined by the applicable national and international legislation, in this corporate policy and in the Code of Ethics and Conduct, is completely unacceptable. Nova Participações.

Strict compliance with this policy protects Nova Participações, its employees, partners, executives, administrators, commercial and business partners, from unacceptable risks and exposures, so that its non-compliance may result in the application of disciplinary measures, as provided in the internal policy that deals with the topic. - Complementary standards.

2- COMPLEMENTARY RULES

The following policies, standards and procedures should be used in their latest revision or in addition to the laws, technical standards, standards and contractual requirements.

2.1 - From Nova Participações

- M0-NC-0001 - Commercialization and Proposal Development;
- M0-PC-0004 - Hospitality, Gifts and Gifts, Entertainment, Donations and Sponsorships Policy;
- M0-PC-0009 - Anti-Corruption and Anti-Bribery Policy.

2.2- National

- Brazilian Penal Code, Decree-Law 2,848 / 1940;
- Consolidation of Labor Laws -CLT, approved by Decree-Law No. 5,452 / 1943;
- Law No. 8.112 / 1990 (Statute of Federal Public Servants);
- Law 8.666 / 1993 (Bidding Law);
- Law No. 12.813 / 2013 (Conflict of Interest Law);
- Law nº 12. 846 / 2013, regulated by Decree No. 11.129/2022 (Anti-Corruption Law).

2.3- International

- Argentina: Law nº 25.188, of 1999 - Public Service Ethics Law;

- Colombia: Law No. 1474, of 2011 - Anticorruption Statute; Law No. 1,776, 2016 - Law Zidres and Law No. 599, 2000 - Colombian Penal Code;
- USA: *Foreign Corrupt Practices Act* - 15 USC §§ 78dd-1 and following ("FCPA") and United States Sentencing Commission ("USSG");
- Mexico: Federal Anti-Corruption Law on Public Procurement, 2012;
- Peru: Legislative Decree nº 1,352, 2017 - Law on Administrative Responsibility for Legal Entities;
- United Kingdom: UK Bribery Act ("UKBA") - Bribery Act, 2010.

2.4- Terms and Definitions

For the purposes of this document, the following terms and definitions apply:

- Public Administration: Set of bodies subordinated to the Executive Branch, including autarchies, foundations and public companies and mixed-capital companies;
- Public Agent: who exercises public function, either temporarily or permanently, with or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, mandate, position, employment or public function, even if temporary, including political agents. It is equivalent to a Public Agent who works for a service provider company contracted or contracted to perform a typical or atypical activity of the Public Administration;
- Collaborator: all Nova Participações employees, including directors, officers, employees, service providers, whatever the type of contract, who work in their core activity or collaborate even indirectly to achieve their core activity, including interns and apprentices;
- Conflict of Interest: for this policy, it is the situation generated by the confrontation between public and private interests, which may compromise the collective interest or improperly influence the performance of the public function, as described in art. 3, item I, of the Conflicts of Interest Law (Law 12.813 / 2013) or situations in which the private interests of employees or partners, or persons related to them, conflict with those of Nova Participações;
- Partner: any and all business partners of Nova Participações, including customers, suppliers, consortium companies, *joint ventures*, affiliates, subsidiaries or any other third parties;
- Related People: Parents, spouse, children, siblings, grandparents, brothers-in-law and first cousins;
- Undue Advantage: Any benefit, favor, favor, facilitation, good, tangible or intangible - including cash or equivalent - and amounts offered, promised or delivered, with the aim of influencing or rewarding any act or decision of a Public Agent. This concept includes gifts, presents, entertainment, airline tickets, accommodation, donations, sponsorships or anything else of value used for this purpose.

3 - COVERAGE

This policy covers all Nova Participações companies, their employees, whether individuals or companies and at any hierarchical level, without exceptions, who must act to ensure compliance with this policy by the public of interest and other third parties, who act before public entities or private, directly or indirectly, for Nova Participações' interest or benefit.

4 - DESCRIPTION

4.1 - General Guideline

The Policy of Relationship with the Public Authorities of Nova Participações obliges all companies of the Group and its consortium members, joint ventures and subsidiaries, without exception, to conduct business with ethics and integrity. This policy determines strict observance and compliance with the Nova Participações Code of Ethics and Conduct, its integrity policies, as well as the applicable anti-corruption legislation, with special attention to the Anti-Corruption Law (Law 12.846 / 13 and its regulations). In addition, Nova Participações has as reference the good international anti-corruption practices provided for in laws, treaties and conventions.

Nova Participações prohibits and, therefore, does not tolerate any acts of corruption and bribery, directly or indirectly, in its relationship with Public Agents, or any Third Parties related to them, therefore, it requires that all its Employees and Partners:

- strictly comply with all anti-corruption laws and regulations applicable to Nova Participações, in addition to respecting its Code of Ethics and Conduct and all its corporate policies;
- do not offer, bribe or make any improper payments to, or to the benefit of, any national or foreign organization, individual or Public Agent;
- do not accept undue advantage from any organization or individuals, to guarantee favors or privileges of, or for, Nova Participações;
- do not make Facilitation Payments on behalf of Nova Participações;
- do not offer or promise employment opportunities for a Public Agent or any Related Persons, directly or indirectly. This offer, on certain occasions, can be perceived as a way to obtain an undue advantage, if it generates an expectation or impression that Nova Participações is receiving or will receive favorable treatment;
- do not frustrate, defraud, manipulate, prevent, disturb or obtain undue advantage in relation to bids and contracts with the Public Administration, as defined by law, or create a legal entity or any other fraudulent or irregular means to participate in such bids and contracts;
- do not hinder the investigation and inspection activity promoted by the Public Administration or by Public Agents, or even, intervene in their actions;
- ensure that all fees, fees and reimbursement of expenses paid to third parties, whose contracts are directly or indirectly linked to the Public Administration, are due to real and legitimate activities, the amount of which is reasonable and proportional to the services provided.

Nova Participações does not engage, authorize or tolerate any business or commercial practice with a Public Agent, which has an exceptional character, or which does not comply with the guidelines of this policy or of the applicable laws, even if it is interpreted as “usual”, “commonplace” or “cultural”.

4.2- Specific Guidelines

4.2.1 - Public x Private Conflict of Interest

Employees who are related to Public Agents, who have decision-making power in the business area of Nova Participações, must declare this possible conflict of interest or appearance, in writing, to the Ethics and Integrity area, which will analyze and suggest the necessary measures for mitigation the risk.

It is important to emphasize that, for the conflict of interests or appearance to occur, there is no need for damage to public assets, not even for the Public Agent to make any financial gain; it is enough that the situation generated by the appearance or real conflict between the public and private interest, compromises, influences or seems to intervene, in an improper or inadequate manner, the regular performance of the public function or activity.

Thus, it is essential that any potential conflict of interest with any Public Agent is informed to be dealt with by the Ethics and Integrity area.

4.2.2 - Gifts, Gifts and Hospitality

Regarding gifts, gifts and hospitality, the provisions of Policies M0-PC-0009 and M0-PC-0004, as well as the Code of Ethics and Conduct of Nova Participações, must be observed.

4.2.3 - Facilitation Payments

They are payments made directly (or indirectly through an agent or intermediary) to a Public Agent, to perform or expedite a routine and non-discretionary act, which he must perform as part of his normal / daily duties or activities. Sometimes known as “urgency fees”.

As provided for in the Policy M0-PC-0009, these payments are strictly prohibited, in addition to being considered bribes by the Anticorruption Law (Law 12.846 / 13).

It is important to highlight that payments made to the Public Administration are not undue due to a legal or contractual provision (fees, taxes, provision of services, etc.).

No employee, third party or partner will suffer any type of retaliation or penalty due to delay or loss of business, resulting from their refusal to pay or receive bribes, however, it is essential to act responsibly when reporting the situation, with consistent information and true facts.

4.2.4- Meetings with the Government

Any interaction between the Nova Participações Group and the Government, regardless of the form adopted, must comply with the highest standard of integrity and transparency.

Nova Participações employees must register through the Business Process System - COMIX, according to standard M0-NC-0001, the holding of meetings with the Public Administration with the objective of signing commitments and making decisions on behalf of the company (eg obtaining licenses, urban planning, among others). At a minimum, the following data must be reported: date, place, purpose and the representatives of Nova Participações, Public Agents present and Institutions they represent.

The meetings with the Public Power must necessarily occur with at least two Nova Participações employees, during business hours, and also, with prior arrangement in the public agenda of the respective authority, preferably in the official premises of the Public Administration body or in the premises of the Nova Participações, with a list of matters to be dealt with, approved by senior management and the company's legal department. Any meeting must be accompanied by the drawing up of the respective minutes, containing the signature of all those present. Record the meeting on an agenda and, if any, list the expenses arising from the reimbursement report, clearly and precisely.

It is understood that two types of contacts with public agencies are possible for Nova Participações' operations: (i) projects and tenders; and (ii) ordinary, regulatory and supervisory.

It is the obligation of each representative of the areas of Nova Participações, to present to the Ethics and Integrity area, a report of contacts that they maintain with public agencies, including the reason for doing so, frequency and name of the company's interlocutor, among others. any information requested.

When possible, these meetings should have minutes and / or recording. If this does not occur, it is up to the Employee to formalize the meeting, by email, containing:

- Place and date of the meeting;
- Full name and title of the participants;
- Brief description of the subject treated;
- Brief description of the decisions taken.

Documents related to these meetings will be sent to the Ethics and Integrity area by e-mail. compliance@novaengevix.com.br.

The communications made verbally with the Government, when dealing with contractual conditions, changes in business conditions, changes in the work structure and / or any other requests related to the activity of the Nova Participações Group must be formalized, which can occur through official e-mail address of the Public Agent (s), with a copy for the superior (s) of the Employee (s) or Third Party (s), and indication of the place and date of contact, full name and position of the participants, brief description of the subject matter and what was decided.

Any and all communication made in writing with Public Agents must be filed in its own directory and sent to the e-mail or official contact of these Public Agents.

Any doubts or clarifications on the topic should be addressed by the respective immediate superior, or even by the Ethics and Integrity area.

4.2.5- Tenders and Public Contracts

The Brazilian Legislation considers as corruption, several actions or omissions committed in the scope of bidding processes and contracting with the Public Administration. In some cases, the participation of a Public Agent is not even necessary, so that the act is punishable by public authorities.

When participating in public tenders, Nova Participações will be subject to and strictly comply with the legal provisions of Law No. 8,666 / 1993 ("Bidding Law") (), its rules and the contractual clauses signed with the public bidder.

Therefore, the Employee, third party or intermediary must be aware that the Brazilian Legislation and Nova Participações prohibit any act with the purpose of:

- frustrate or defraud, by means of adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
- prevent, disturb or defraud the performance of any act of public bidding procedure;
- remove or seek to remove a bidder, by means of fraud or offering an advantage of any kind;
- defrauding public bidding or contract resulting from it;
- create, in a fraudulent or irregular manner, a legal entity to participate in a public bidding process or enter into an administrative contract;
- obtaining an improper advantage or benefit, in a fraudulent manner, from modifications or extensions of contracts entered into with the Public Administration, without authorization by law, in the call for tenders or in the respective contractual instruments;
- manipulate or defraud the economic-financial balance of contracts entered into with the Public Administration.

Every Employee and Third Party who has any form of participation in bidding processes must observe the specific guidelines for participating in bidding (Annex I), which contains the guidelines for each phase of the bidding process until the monitoring of contractual execution.

4.2.6 - - Inspection of Public Authorities

The Public Administration has the power to supervise the performance of private individuals, in the cases and conditions provided for in the legislation. Whenever exercised with prudence and within legal limits, inspection is an effective instrument for preventing abuse or illicit acts.

In this sense, the treatment with public authorities during the inspection must be based on transparency and ethics, the Collaborator (s) responsible for the interaction must act with cordiality and integrity, providing the requested information in an objective manner. , following the guidelines below:

- at least two Employees responsible for monitoring public inspections, and it is recommended that there be rotation among such Employees;
- it is essential to collect the formal inspection document exercised by the inspecting Public Agent, such as the inspection report. If not provided, the Collaborator (s) must prepare a report, formalized by *email*, which contains the full description of the inspection. This report must include, at a minimum: (i) date; (ii) identification of the responsible Public Agent; and (iii) synthesis of what was surveyed. In both cases, the Collaborator (s) must (later) forward the document to the superior and to the Legal and Ethics and Integrity Department;
- all requests made by Public Agents and all documents made available for inspection by the Employee (s) must be duly registered and filed.

It is strictly forbidden to perform acts by Employees or Third Parties in order to hinder, defraud or obstruct investigative or inspection activities by government agencies, as well as any act that may constitute contempt or disobedience.

Any doubts from Employees or Third Parties about the interaction with Public Agents in inspection procedures must be immediately submitted to the Ethics and Integrity Department.

In view of possible inspections, it is essential that the Employee assume a formal and respectful posture, and that he / she does not, under any circumstances, prevent the performance of the Public Agent. Creating an embarrassment to carry out the inspection can generate penalties for the Institution and the Employee, in addition to configuring an illegal act.

Still, aiming at the collaborative and participative character of the company, all Employees and Third Parties acting on behalf of the Nova Participações Group, must always provide the information and clarifications requested by the authorities, in the course of investigations and processes, and any action with the intent is prohibited obstruct the inspections carried out by Public Agents.

4.2.7 - Obtaining Licenses, Authorizations, Permissions and Certificates

Employee (s) and / or Third Party (s) are prohibited from offering (in) Undue Advantage with the aim of speeding up or guaranteeing the obtaining of licenses, authorizations, permissions and certificates or inducing Public Agent to practice, omit or delay official act.

Only persons authorized by legal representatives may act in the process of obtaining licenses, authorizations, permissions and certificates. All acts performed by the Employee (s) must be duly formalized by means of minutes or e-mail to the hierarchical superior and filed in a specific physical or virtual folder, for control.

The hiring of Third Parties to assist in obtaining licenses, authorizations, permissions and certificates from the Government must occur exceptionally. If it is essential, the responsible Employee must request authorization from the Legal and Compliance Department, respecting the Third Party's prior verification procedures, in accordance with the Third Party Due Diligence Policy.

4.2.8 - Hiring Agents and Former Public Agents

The hiring of Public Agents is only allowed, when there is no incompatibility between the exercise of public office or function and working hours, as provided in article 117, of Law No. 8,112 / 90. As a rule, the Public Agent under the exclusive dedication regime is prohibited from exercising any private activity.

Except for the situations mentioned above, it is, in principle, permitted to carry out private activities by Public Agents. Thus, if there is a need for hiring, the provisions of the aforementioned legislation and the principles that govern Nova Integridade's Integrity Program must be considered.

It is forbidden to hire former Public Agents, within the six-month period, from the date of dismissal, dismissal, dismissal, dismissal or retirement, as established in art. 6, item II, of Law 12.813 / 2013 ("Conflict of Interest Law"), except for legal exceptions.

Any hiring of an Agent or ex-Public Agent must be previously communicated to the Ethics and Integrity area, who will be responsible for issuing an opinion, recommending - or not - its admission, in order to mitigate risks of conflicts of interest or appearance .

The hiring of family members of Public Agents or ex-Public Agents must also be communicated and evaluated by the Nova Participações area of Ethics and Integrity, in the manner provided for above.

4.2.9- Transactions with intermediaries

Employees must act to ensure compliance with this policy, by partners who act as intermediaries (eg dispatchers, lawyers and environmental consultants), in acts before the government, in the interest or for the benefit of Nova Participações, always in line with local legislation.

4.2.10 For more information on this topic, see item 4.2.2 - Use of Agents and Third Parties of the M0-PC-0009.

4.3- Communication, Training and Questions

Nova Participações maintains a periodic and constant communication and training plan, made for its Employees, in order to promote their awareness about the importance of complying with the rules of this and other corporate policies.

It is the responsibility of each leader of Nova Participações to make the contents of this policy widely available to its followers., as well as, through their speeches and actions, encourage them to raise questions or concerns about its practical application.

Any situations, exceptions and / or clarifications on the application of this policy, should be sent to the Ethics and Integrity area email (compliance@novaengevix.com.br).

4.4- Ethics Channel

Concerned about keeping the work environment intact and free from irregularities, Nova Participações makes available to its internal and external public, a means of communication for receiving - by an independent and specialized company - suggestions, complaints, complaints and reports about unethical conduct, violation of current legislation and / or facts that contradict its corporate policies and its Code of Ethics and Conduct, it being essential that those to whom this policy applies, immediately report any acts, facts or suspicions that fall under the conditions mentioned above. In this sense, we make the Ethics Channel available through the following means:

- Website: www.novaparticipacoes.com;
- Website: www.canaldeetica.com.br/novaparticipacoes/
- Telephone: 0800 300 4721 - 24 hours a day.

It is not necessary to identify yourself when using the channel although it is essential to act responsibly when reporting, which must be consistent and truthful.

Nova Participações guarantees to the whistleblowers anonymity, confidentiality, impartiality and security in the handling of complaints. Any form of retaliation against whistleblowers who act in good faith is not allowed or tolerated, as provided for in the Ethics Channel Policy in force. , namely, M0-PC-0007.

4.5- Investigations and Sanctions

All reports of suspected violations of this policy will be investigated in an appropriate and timely manner. If, after an internal investigation procedure, the occurrence of infringing conduct is proven to occur, immediate and exemplary corrective measures will be taken, considering the circumstances, gravity and applicable law.

Violation of any provision of this policy will subject the violator to the disciplinary sanctions provided for in the Code of Ethics and Conduct of Nova Participações - now listed - in proportion to the violation, and also, according to the effective personal participation of the investigated, duly verified, and not necessarily in the order below:

- verbal warning;
- written warning;
- suspension;
- unfair dismissal;
- dismissal for cause;
- termination of the service agreement, commercial or business partnership agreements;
- appropriate legal action.

Crimes related to the fraud of competitions, committed against the Public Administration, including influence peddling and corruption, practiced against the national or foreign administration, have a penalty of detention or imprisonment of at least six months and a fine.

4.6- Responsibilities

The documentary, financial and accounting records, linked, directly or indirectly, to the company's relationship with the government, must be maintained in a way that they can be verified and audited, for a minimum period of five years, with each area responsible for archiving the documents. documents you produce.

Nova Participações employees are responsible for complying with all the provisions of this policy, as well as ensuring that partners and other third parties are aware of its content.

5 - VALIDITY

This policy takes effect on the date of its disclosure.

ANNEXES

ANNEX I - SPECIFIC GUIDELINES FOR PARTICIPATING IN BIDDINGS

I.1 PMI - Expression of Interest Procedure

Any interaction with Public Agents in the context of PMIs must strictly adhere to the technical and procedural issues involved, within the legal limits. In this sense, the following conducts are prohibited:

- Develop negotiations, formal or informal, and / or perform acts that aim to offer or request an Undue Advantage or that can be interpreted as an Undue Advantage;
- Develop negotiations, formal or informal, with the public entity responsible for the PMI and with the other competitors, in addition to establishing and using fraudulent means or practicing illegal acts in order to ensure that the studies and proposals presented by the companies of Grupo Nova Participações are consecrated winners of the PMI and / or ensure that the Company is the winner of a future bid resulting from the studies presented by it; and

In the event of receipt of a request for an Undue Advantage in the context of PMI, the Employee (s) must promptly deny the request and immediately inform the senior management and the Board of Governance and Integrity of Grupo Nova Participações before establish any new contact with the Public Agents involved.

I.2 Pre-Bidding Phase

The following rules and procedures must be followed when interacting with Public Agents in the pre-bidding phases:

- Any interaction with Public Agents must be clear and transparent, without any intention of directing. If it is requested to send material prior to the contracting public entity, the availability must be made formally via *email* official of the responsible Public Agent and containing preferably public information. Before sending any material to the public entity, it is essential to check if there is legal permission and / or authorization in the Calling Act to do so;
- In any request for information to Public Agents about the bidding process, the Employees involved must inform their hierarchical superiors for knowledge and approval; and
- Documents pertinent to the qualification in the bidding process will be kept up to date and it is recommended that there is monitoring of Employees in case of restrictions / debts. These documents will be properly stored in a specific directory, with access to the Legal Departments and the Board of Governance and Integrity.

I.3. Participation in the Bidding Process

If you are interested in participating in the bidding process, the Company's top management will designate Employee (s) to act on your behalf, making them responsible for all interaction with the contracting entity. It is recommended that there is rotation between the indicated Employees.

The Governance and Integrity Department is responsible for maintaining continuous monitoring of the bidding process in order to avoid the occurrence of illicit practices and provide assistance in case of doubts of the Employees involved.

The following rules and procedures must be followed by the companies of the Nova Participações Group to guarantee their regular participation in bidding processes:

- To participate in any of the bidding modalities, the following must be observed:
 - (i) all registration or registration made in the name of the Company must be carried out by an Employee appointed with the technical and / or commercial capacity to do so, as long as he has the appropriate powers of representation;
 - (ii) whenever possible, the registration or registration must be carried out using all the Company's credentials, such as e-mail and professional contacts;
 - (iii) all communication with the contracting entity must be carried out formally, not allowing the use of e-mail or personal telephone for this purpose; and
 - (iv) full compliance with all deadlines and rules provided for in the legislation pertaining to public tenders and administrative contracts.
- For the qualification phase in the bidding process, the Company must pay attention to all the documentary requirements presented in the Calling Act and in the relevant legislation;
- Any fee or expense related to bidding processes (such as, for example, fee for withdrawal of the Call Notice) must be duly paid and the respective receipt filed in its own directory;
- All proposals prepared by the Company, and all documentation related to them, must be sent to the Company's Chief Executive Officer for validation before being sent to the President of the Bidding Committee or to the Auctioneer; and
- The Collaborator (s) responsible for the bidding must immediately report to the CEO if any of the following occurs:
 - (i) Rejection of application for registration in cadastral registration, its alteration or cancellation;
 - (ii) Qualification or disqualification of the Company in the bidding procedure;
 - (iii) Non-acceptance by the contracting entity of the Company's commercial proposal; and
 - (iv) Annulment or revocation of the bidding.

I.4. Adjudication and Approval of the Bidding Object

After the acts prior to the bidding have been completed and the Company winning the bidding process has been declared, the designated Employee (s) shall pay attention to the fulfillment of all formalities provided for in the Calling Act for the signature of the contract awarding minutes. bidding object. Considering that the award act has a binding character and precedes the signing of the administrative contract, the Collaborator (s) who sign (s) the said minutes must be in full power to do so, either by power of attorney, either by function or position held in the Company.

I.5. Monitoring of Contractual Execution

After awarding and signing the administrative contract with the Public Administration, the Company must adopt measures to monitor and control contractual execution, thus preventing fraud and illegal acts. The Company's top management will designate Employees to exercise the function of “contract manager”, and it is mandatory that such managers be changed in a period to be defined in order to ensure that there is rotation between Employees.

The contract manager (s) is responsible for managing the provision of the Company's services, which includes:

- Observe and comply with the deadlines for providing information to the Public Administration, whenever requested;
- Monitor and demand compliance with contractual obligations by Employees and Third Parties involved in the provision of services to the Public Administration;
- Properly register all documents from contractual execution in a specific directory on the Legal Department platform, for access whenever requested;
- In the event of sanctions being applied by the Public Administration, inform the Legal Department immediately for the adoption of appropriate measures;
- Comply with the amount determined by the Public Administration in the case of unilateral contractual changes, provided that it is carried out according to the legal limits and those provided for in the administrative contract;
- Provide Public Agents with the information necessary for the execution of the contract in a clear, objective and timely manner, and only when officially requested, in accordance with the premises of this Policy;

In the event of entering into contractual amendments, maintain an adequate record of all signed minutes of the addendum terms, as well as of the relevant documents for their execution (negotiated minutes, e-mails and official communications of negotiations, etc.); and

- Undertake all technical efforts for the effective and regular provision of services contracted with the Public Administration.

The Governance and Integrity Department is responsible for continuously monitoring the execution of administrative contracts entered into by the Company, providing assistance when required and acting in order to prevent and mitigate risks involving the practices provided for in item 4.2.5 of this Policy.