

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



ANTI-CORRUPTION POLICY

The Renova Foundation, through this Policy, reinforces its commitments to ethical principles and honesty, established in its values and the conduct set out in its Code of Conduct. Based on this commitment, it assumes the responsibility of participating actively in fighting against corruption and fraud in all its areas of performance.

1. Objective

The Foundation is committed to conducting all business in compliance with current legislation and the highest ethical standards. During its operations, the Renova Foundation seeks to avoid even the appearance of impropriety in the actions of its board members, directors and other employees. We count on everyone to always exercise good judgment, discretion and moderation in conducting the Foundation's business.

The Code of Conduct establishes that integrity is a fundamental value for the Renova Foundation. This Anti-Corruption Policy ("Policy") reiterates our commitment to integrity, defines the specific requirements and prohibitions applicable to our operations in compliance with anti-corruption legislation, including, but not limited to, Law No. 12,846 of 2013 (Anti-Corruption Law) and the Foreign Corrupt Practices Act of 1977 ("FCPA"), as well as provides information for preventing and reducing the risks of corruption and bribery related to the Foundation's activities.

The Foundation will take all necessary measures to ensure that corruption and bribery do not occur in its activities and will not tolerate any violations of its principles and values of ethics and integrity.

In short, in compliance with the FCPA and other relevant legislation, it is illegal to offer, pay, or provide anything of value to a person in exchange for the use of that person's position in government or a private organization for the benefit of oneself or the organization. Providing "something of value" means virtually any type of arrangement in which an advantage is provided that benefits the person receiving it rather than the organization or government entity that person represents. Within the scope of this Policy, we will refer to such benefits as "Personal Advantages". It is also illegal to request or receive Personal Advantages in exchange for providing undue benefits.

The most common types of Personal Advantages offered in violation of anti-corruption

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



legislation are financial, such as advance payment in cash or bribery. However, less obvious Personal Advantages, such as the promise of obtaining a job interview for anyone, are also prohibited if the intention behind the offer is to influence the person to misuse their authority, by virtue of their official position. We firmly believe that corruption and bribery, whatever form they take, ultimately undermine the integrity of government and society at large, as well as the decision-making process, and harm the entire community. The foundation will not participate in, nor tolerate, acts of corruption or bribery in its relations with public and private officials.

The penalties for violating these laws are serious and can expose the Renova Foundation to significant fines and serious reputational damage. Additionally, individuals who violate these laws and other legislation may also be subject to imprisonment and fines.

This Policy establishes the Foundation's expectations and requirements regarding compliance with these laws, and is directly applicable to all employees (including board members and directors). We also expect that all third parties with whom we work and will work in the future will also adopt these same standards in their relationship with the Foundation.

2. Target Audience

All interns, employees, third parties and members of the management bodies of the Renova Foundation, including the Board of Governors, Executive Board, Supervisory Board and Advisory Board, as well as all business partners who represent the Foundation, whether by proxy or by the nature of the service.

It is worth highlighting that one of the main objectives of this Policy is to ensure that all those who have any link with the Foundation comply with the requirements of legislation and best practices in the fight against corruption, both nationally and internationally, in particular the provisions of anti-corruption and Anti-money laundering laws, in order to guarantee that during the conduct of business, by whoever it may be, the highest standards of integrity, legality and transparency are adopted.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



3. Additional Documents

The following documents are complementary to this policy:

- Code of Conduct;
- Code of Conduct for Third Parties;
- Compliance Integrity Program Policy.

4. Responsibilities

Who creates	Who should be consulted	Who approves
Compliance Manager	-	Board of Governors

5. Glossary

- **Agreement:** Settlement agreement signed between Samarco, Vale, BHP and various government authorities on March 2, 2016;
- **Benefits:** Any gifts, presents, meals, entertainment, hospitality or other things of value, which may be named together and/or separately;
- **Business Partner:** any third party who, in the context of their activities for the Foundation, has the authority, power or capacity to make decisions, negotiate, represent or assume commitments with Public Officials on behalf of or for the benefit of Renova, including arbitration claims involving public or private officials;
- **Due diligence:** Detailed research of the third party regarding possible risks of corruption and fraud. It must be carried out in some situations: a) when there is identification of at least one Red Flag (or risk alert), b) when the manager understands that the analysis is necessary or c) when there is a risk mapped by the Supply Department, Requesting Department or Compliance. The objective is to obtain access to more information from the third party and map any potential risks. The research is carried out in several public sources and databases, with the purpose of identifying possible fraud, risks, history of corruption and/or non-conformities, compliance with standards and adherence to legislation.
- **Employees:** All interns, employees, third parties and members of the management bodies of the Renova Foundation, including the Board of Governors,

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

Executive Board, Supervisory Board and Advisory Board, as well as all business partners who represent the Foundation, whether by proxy or by the nature of the service;

- **Entertainment:** sporting, cultural or social events, concerts, plays, technical and business conferences as an integral part of a current or future business relationship
- **Facilitation Payment:** A facilitation payment is a nominal payment to a public official for the purpose of ensuring or expediting the execution of a routine, non-discretionary action by the government. Examples of facilitation payments are:
 - Streamlining the process of obtaining licenses, authorizations or visas;
 - Obtaining tax benefit; or
 - Obtaining police protection.
- **Gifts:** are tangible items, with commercial value, and which do not necessarily bear the institutional brand of a company or institution. Examples: flowers, fountain pens or branded pens of relevant value, watches, backpacks, electronics, leather briefcases, paintings, books, CDs, DVDs, Blu-rays, sculptures and works of art, ornaments, Christmas baskets (or those related to another commemorative date) and alcoholic beverages.
- **Government authority:** Government authority is any nation or any political subdivision of a nation, whether state or municipal, and any agency, authority, instrumentality, regulatory agency, court, state bank or any entity exercising executive, legislative, judicial, tax, regulatory or administrative powers or functions of or for a government.
- **Handouts or Freebies:** These are items with a normally low or insignificant nominal value or that have no commercial value, which in some way bear the institutional brand of a company or institution. Examples: personalized pens, watches, mechanical pencils, folders, wallets, keychains, diaries, notebooks, photo frames, calendars, pen drives, card holders, notepads, mugs, recyclable bags, office ornaments, among others.
- **Hospitality:** situations in which plane tickets, ground transportation, meals, accommodation, participation in technical and business events or conferences

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



may be offered as an integral part of a current or future commercial relationship and which presuppose travel from the place of work.

- **Meals:** breakfast, snack, lunch or dinner during which business discussions can be conducted.
- **Other Things of Value:** any benefit, tangible or intangible, that does not qualify as a Freebie, Gift, Meal, Entertainment or Hospitality under this Policy. Examples: job offers, promises of recommendation (for example, speaking well of someone to favor them or moving someone's resume to the top of the list), offering fuel for commercial or operational purposes, discounts on loans, receiving or attempting to receive discounts other than regular market practice or other benefits, in the acquisition of goods or services for personal use or consumption, by virtue of their position at the Renova Foundation .
- **Personal Advantage:** Personal Advantage is anything of value given or performed for the benefit of the recipient. There is no minimum value for a Personal Advantage, including but not limited to cash, cash equivalents (such as gift cards), gifts, travel, meals, entertainment, use of vehicles, lodging, favors such as educational and employment opportunities for friends or relatives, or received by a person.
- **Public Official :** (i) any person who, even temporarily or without remuneration, holds a mandate, position, employment or public function in government agencies, entities or diplomatic representations, as well as in legal entities controlled, directly or indirectly, by the public authorities or in international public organizations; (ii) a political party, its member, employee, official or other person acting for or on behalf of the political party¹; or (iii) candidate and pre-candidate for political or elective office.
- **Supplier:** Suppliers are contractors, organizations, associations, foundations, groups or individuals (other than employees) engaged to perform services for the Foundation or appointed to perform the obligations set forth in the Agreement.

¹ Simple affiliation to a political party does not fall within the concept of a public servant.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

6. Principles and Rules

6.1. General Prohibitions

6.1.1. Corruption

No employee (including board member and director) of the Renova Foundation may offer, promise, authorize payment, pay or provide, directly or through a third party, a Personal Advantage to a public official with the intention of inducing or rewarding any type of undue execution of any duty, responsibility or obligation of that public official, such as making a decision that benefits the Foundation or its stakeholders.

6.1.2. Commercial Bribery

No employee (including board member and director) of the Renova Foundation may offer, promise, authorize payment, pay or provide, directly or through a third party, a Personal Advantage to any employee, official or representative of another company, with the intention of inducing or rewarding the improper execution of any professional duty, responsibility or obligation of the recipient.

6.1.3. Facilitation payments

No employee (including board members and directors) of the Renova Foundation may offer, promise, authorize payment, pay or provide, directly or through a third party, a Facilitation Payment.

6.1.4. Government Contract Fraud

No employee (including board member and director) of the Renova Foundation may:

- 1) frustrate or defraud, through collusion, arrangement or other means, the competitive nature of public procurement procedures;
- 2) prevent, hinder or defraud the execution of any act in a public procurement process;
- 3) disqualify a competing bidder by means of fraud or by offering any type of advantage;
- 4) defraud a public procurement procedure or a contract arising therefrom;
- 5) fraudulently create a legal entity to participate in public procurement procedures, or to enter into contracts with a government authority;
- 6) fraudulently obtain an improper advantage or benefit arising from amendments or extensions of contracts with the public administration, without

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

legal authorization established by law, by the terms of the public procurement process or by the respective contracts; 7) manipulate or defraud the economic and financial balance of contracts with the public administration; or 8) hinder the investigation or auditing capacity of public bodies, entities or officials, interfering in their work.

6.1.5. Accepting Undue Personal Advantages

No employee (including board members and directors) of the Renova Foundation may request, agree to receive or accept, directly or indirectly, a Personal Advantage as an inducement or reward for undue execution of any duty, responsibility or obligation of their position at the Foundation to influence decisions such as hiring personnel, entering into contracts or selecting the Foundation's priorities.

6.2. Additional guidelines

Transactions that violate national and international anti-corruption legislation, the code of conduct and internal rules of the Renova Foundation may arise in a number of ways and personal advantages may include "arrangements", in addition to obvious situations such as cash payments or bribery. For the avoidance of doubt, these transactions are prohibited even if they are only offered or promised but not actually carried out.

The following list with examples of Personal Advantages is intended to demonstrate how comprehensive can be the definition of "something of value", not limiting it to:

- Handouts, presents, hospitality or items of any value.
- Educational opportunities, job interviews or offers, letters of recommendation, medical services.
- Donations (including to charity) to organizations with some type of direct or indirect relationship with third parties or public officials.
- Directing contracts to a certain supplier linked to the third party or to a public official.
- Allow the use of Foundation resources (e.g., allow unlimited access to Foundation vehicles for personal use).
- Reimbursement of expenses not justified to an employee or a Supplier.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



- Contributions to a political party or candidate's campaign (donations, facilities for political events or campaign workspace, event sponsorship, transportation, etc.).

6.3. Handouts, Gifts, Hospitality and other valuables

6.3.1. Preliminary guidelines

When giving or receiving handouts, gifts, hospitality or other valuable items to Renova Foundation employees, it is important to reinforce some fundamental premises, namely:

- Benefits granted or received should not be exorbitant or extravagant, but must be occasional and of modest value,
- Benefits should be made or received in an open and transparent manner,
- They must have a legitimate commercial and institutional purpose,
- They must not involve offering/receiving money to/from third parties,
- The circumstances must not appear to be bad faith or be confused with acts of corruption and fraud,
- When made public, they cannot impact our own reputation or that of the company,
- Frequency must not give the appearance of improper conduct.

6.3.2. Limited Benefits Allowed

In compliance with anti-corruption legislation, the Foundation prohibits giving or offering a personal advantage in an attempt to influence a third party to commit abuse in relation to their professional position. This is contrary to the laws and policies of the Foundation. However, there are occasions when the activities of the Renova Foundation will involve the offering or receiving of handouts, gifts, meals, entertainment or other hospitality or the acceptance of travel, meals or accommodation as a courtesy or to meet the projects and objectives of the Foundation.

6.3.3. Prior Approval Requirement

In order to grant, offer or receive any benefit listed below, it is necessary to obtain approval from the Manager of the responsible department (or the Director, when

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



applicable) and the Compliance department **before** offering, giving or receiving any of the following items:

- a) Freebies or handouts (i.e., given as a courtesy or in recognition of services rendered, or to promote goodwill), gifts, meals, entertainment or other hospitality **involving a private party** (whether such hospitality is provided at the Foundation's office or at a restaurant, conference venue or otherwise) with **a total value exceeding R\$200.00 (for the event)**. It is worth remembering that all hospitality must be reasonable, must have a commercial purpose and be aligned with the role of the guests or recipients.
- b) Any handouts, gifts, meals, entertainment or hospitality involving a public official, **regardless of the value**.
- c) **Other items of value** regardless of the counterparty and the amount involved require prior approval from the responsible manager and the compliance department. These cases include unusual requests, such as the supply of fuel or the hiring of a relative, among others.

As an illustration, the following table shows the need for prior approvals:

Counterparty classification	Benefit to be granted, offered or received	Requires prior approval from the responsible Manager** (or Director, when applicable)	Requires approval from the Compliance department
Private	Handouts, gifts, hospitality or other things of value above BRL 200.	If the total amount is greater than BRL 200	If the total amount is greater than BRL 200
Public	Handouts, gifts, meals, entertainment, hospitality or other things of value regardless of the value	Always	Always
Private/Public	Other things of value, independent of the counterparty and the value involved	Always	Always

*Benefits must be considered cumulatively per event upon granting.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



** When the applicant for the grant is a manager, approval must be requested from the respective Director.

*** *Note: It is not necessary to fill out the handout/gift form when: a) direct employees or third parties participate¹ in corporate events or internal training sessions while "at work", with granting or receiving of handouts and hospitality (Ex: training or internal event with coffee break or snacks, with granting of freebies to third parties in these events b) when Renova's departments wish to grant gifts or presents to Renova employees themselves, such as: internal recognition actions, achievement of goals, among others. The rule does not apply when third parties are involved. c) when it involves institutional gifts (items with a normally low or insignificant nominal value or that have no commercial value, which in some way bear the institutional brand of a company or institution. Examples: personalized pens, watches, mechanical pencils, folders, wallets, keychains, diaries, notebooks, photo frames, calendars, pen drives, card holders, notepads, mugs, recyclable bags, office ornaments, among others.)*

**** The receipt and granting of gifts, presents, hospitality or other things of value must not occur habitually involving the same parties more than twice in a 12-month period.

6.3.4. Exception to prior approval/regularization

Exceptionally, certain hospitalities may be granted or accepted, such as hospitalities for participation in public hearings, meals at demonstrations, lunch or dinner, as a form of courtesy and as long as they involve reasonable values (within the values provided for in PG-SAD-001 - Travel, Transportation and Accounting Procedure), without prior approval from the responsible manager and the Compliance department. These situations must be the result of events or meetings in which there was no prior invitation to the meal and/or sufficient time to plan concessions and must be subsequently registered with the Compliance department within 7 business days, counting from the first business day of the event date.

Third Parties: Individuals or legal entities that maintain a non-employment contractual relationship with the Renova Foundation or that provide services without an employment relationship, as well as their suppliers, partners, executors and other people involved (e.g. Third-party contract inspectors) in projects executed or supported by the Renova Foundation.

6.3.5. How to activate the compliance department

Any employee (including directors and board members) who wishes to provide or grant a benefit or who expects to receive a gift, present, hospitality or anything else of value must complete the Handouts and Gifts Form available on Sharepoint. The analysis

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



process is automated, given that, when filling out the form, automatic emails are sent to the responsible parties involved for analysis and approval. After completion by the employee, the technical manager or technical director, as applicable, must approve the request. The Form must contain all relevant information, including but not limited to:

- Names and affiliations of all beneficiaries and/or participants;
- Whether the institution involved is public or private;
- Total value of the benefit;
- Justification for granting or receiving the benefit,
- Well-defined plan for documenting expected expenses.

The Compliance department will conduct the analysis of the request by verifying the information provided, and it may request any clarifications, if necessary, in addition to assessing whether the granting or receipt of the benefit is in compliance with the Foundation's policies and procedures. The Compliance department may also, at its discretion, escalate the matter to the Compliance Committee.

The request may be approved or rejected by the compliance department. Further details on documents and process flow are described in the specific work instructions on the topic.

In the case of granting benefits to public officials (for example, travel expenses, granting coffee breaks, lunch, dinner or others), the compliance department may demand that the requester provide evidence of the expenses actually incurred, as well as proof of payment in a specific bookkeeping account for this purpose.

6.3.6. All Other Personal Advantages Presumably Prohibited

No employee (including board member and director) of the Renova Foundation may offer, promise, authorize payment, pay or provide, directly or through a third party, any form of Personal Advantage not described in 6.3.1 - 6.3.3 without permission from the Compliance department. These cases include unusual requests such as supplying fuel directly to an individual or hiring a relative of a relevant third party.

6.3.7. Prohibited request

Employees (including board members and directors) of the Renova Foundation cannot

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

request any Personal Advantage from third parties. They may also not act in a manner that places any third party in a position where they may feel obliged to provide a Personal Advantage to do business or continue to do business with the Foundation.

6.3.8. Payment of Personal Advantages:

a) Preference for Direct Payment: Employees (including board members and directors) of the Renova Foundation must follow internal rules to make direct payments to the supplier for any personal advantages approved to be offered to third parties. If it is not feasible or possible for the Foundation to pay suppliers directly, the third party receiving the Personal Advantage may pay for the service and request reimbursement from the Foundation.

b) Refund Only with Documental Proof: Employees (including board members and directors) of the Renova Foundation may authorize or make payment for any request for reimbursement of a Personal Advantage that exceeds the offer or is presented without verifiable copies of the original receipts, in accordance with the rules of the Foundation's financial department. This policy must be communicated to any third party in the event that the Foundation is unable to pay the supplier directly.

6.3.9. The concept of hospitality does not include

Any expenses for meals or transportation provided during visits to Renova facilities and offices with internal governance audiences and external audiences with a technical-operational focus (technical visit, monitoring of the progress of programs/works), committees and public oversight bodies, public officials, among other guests. The purpose of these visits is to technically present the progress of the works/deliveries and are organized and carried out directly by the technical departments responsible for relations with the public in question. Technical visits do not require supervision by the institutional relations team. The amounts spent on meals and transportation cannot exceed the limits per person set out in Renova's travel expense policy, following the same travel pattern parameters applied to all employees.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



6.3.10. Violations

If there is a violation of this Policy, the Renova Foundation will apply criteria defined in its Consequence Management Policy. If the infraction also violates the Laws of Anti-corruption, other sanctions may be applied to employees (including board members and directors) who commit the offence.

6.3.11. Additional guidelines

If you have any doubts about accepting or offering a benefit, consult the Compliance department in advance. Not having knowledge of the legislation or this Policy cannot be used as justification for any violation.

6.4. Relationships with Third Parties, Communities and Authorities

6.4.1. Authority to Enter into Agreements

Only individuals duly authorized by the Foundation's Board of Directors may enter into agreements or make promises to third parties on behalf of the Foundation.

6.4.2. Required Due Diligence Policies and Procedures

The Compliance department must promulgate and maintain policies and procedures establishing the necessary "Due Diligence" analyses in relation to this subsection. Each specific policy should establish: (i) the conditions that define when due diligence must be performed; (ii) the specific actions that must be taken; (iii) the timeframe for each action; and (iv) the person responsible for each action. Furthermore, the Compliance department is responsible for developing any additional procedures that may be necessary to ensure that this Policy is effective in the Foundation's specific programs and projects.

a) **Third Party Analysis.** No supplier may be hired or begin work on behalf of the Foundation, for whatever purpose, without undergoing Compliance procedures for Third Party Analysis, in accordance with the provisions of the procedures. Due diligence will be applied to suppliers that present red flags.

b) **Program Due Diligence.** No program, investment, concession, project or any obligation of the Foundation established in the Agreement involving a public official

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



may be initiated without a risk assessment, technical analysis, process of “Due Diligence” and approval by the Compliance department, all with due documentation.

c) **Joint Initiative “Due Diligence”**. The Foundation may not partner with any individual, group or organization in a joint initiative or sponsorship unless the third party has undergone a “Due Diligence” process and been approved by the Compliance department.

d) **Donor Due Diligence**. The Foundation cannot accept large-value donations from any individual, group or organization unless the third party has undergone a “Due Diligence” process and is approved by the Compliance department.

6.4.3. Contracts

All disbursements made by the Foundation under the Agreement must include a formal written contract containing:

- (i) a clear definition of the program;
- (ii) an anti-corruption clause;
- (iii) accountability clause (where applicable);
- (iv) any other clause necessary to comply with this Policy and to avoid the risk of corruption.

6.4.4. Third Parties Meeting Our Standards

The Foundation will only transact with trustworthy and ethical individuals, groups or organizations. The Foundation will include in contracts with suppliers, third parties and Business Partners:

- (i) clauses of commitment to the Code of Conduct and other applicable compliance policies;
- (ii) representation regarding the due use of funds; and
- (iii) possibility of termination of the contract in case of violation of policies, representations, or clauses.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



6.4.5. Authority and Responsibility for Conducting Due Diligence

Those responsible for the actions described in the “due diligence” procedure have the obligation to carry out their responsibilities in the manner described. Failure to comply with this requirement will be considered a violation of this Policy.

6.4.6. Authority and Responsibility to Assess Compliance Risks

The Compliance department is responsible for assessing all compliance risks.

6.5. Payments

6.5.1. “Cash” Payments Prohibited

No employee (including board members and directors) of the Renova Foundation may authorize or make cash payments of any kind to third parties, except under conditions authorized in the rules relating to corporate travel.

6.5.2. Payments to Unverified or Unidentified Accounts

No employee (including board members and directors) of the Renova Foundation may make bank payments of any kind to a third party's account without first checking whether the account number is linked to the recipient's tax identification number.

6.5.3. Personal Funds Restriction

No employee (including board members and directors) of the Renova Foundation may use personal funds to provide anything of value to third parties, in a way that if paid directly by the Foundation, would be prohibited by this Policy.

6.6. Books and Records

6.6.1. Total Transparency

All employees (including board members and directors) of the Renova Foundation must faithfully and accurately describe the purpose and amount of each transaction for which they were responsible.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

6.6.2. Prohibition of “Creative Accounting” Practices

No employee (including board members and directors) of the Renova Foundation may record the amount or description of a transaction inaccurately or as an attempt to conceal the true nature of the transaction. Any attempt to do so will constitute grounds for termination of the contract.

6.6.3. Cooperation with Accounting Audits

A sample of all entries and respective documentation must be periodically reviewed by the Foundation's internal audit department or external auditor to identify discrepancies, errors and omissions. All employees (including board members and directors) of the Foundation must offer full cooperation in relation to requests of this nature. Failure to comply with this requirement will constitute justification for termination of the contract.

6.7. Training and Certification

6.7.1. Authority and Responsibility for Training

The Compliance department is responsible for preparing, updating and providing anti-corruption training, including practical guidance on the Integrity Program, for all employees (including board members and directors) of the Renova Foundation, as well as any representatives of business partners who interface with public officials on behalf of the Foundation.

6.7.2. Mandatory Initial Training

Employees, board members and directors of the Renova Foundation must complete anti-corruption training within 60 days of joining the Foundation.

6.7.3. Mandatory Annual Training

Renova Foundation's own employees, board members and directors must complete anti-corruption training once a year. Failure to comply with this requirement will be considered a violation of this Policy.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

6.8. Suspicion of External Violations

6.8.1. Reacting to External Violators

Own employees, board members and directors of the Renova Foundation who receive a request or demand for Facilitation Payment, bribery, or any Other Prohibited Personal Advantage, or even receive an offer of bribery or other Personal Advantage as an attempt to influence the execution of their responsibilities at the Foundation, must take the following measures (if possible):

1. Make sure you have not misheard or misunderstood the other party.
2. Clearly and deliberately refuse to cooperate.
3. End discussions as quickly as possible.
4. Report the undue request or demand promptly to your superior and the Compliance department as soon as you leave the meeting.
5. Document the incident report in writing as soon as possible.
6. Be prepared to offer full cooperation to the Compliance investigation team.

Third parties working on behalf of the Foundation who receive such requests, demands or offers in connection with work for the Foundation should refuse to cooperate and report the incident to their contact at the Foundation before taking any further action.

6.8.2. Health and Safety Priority

The Foundation will not tolerate corruption or bribery, but the health and safety of our employees and officials is our highest priority: If any prohibited payment is requested or offered in a manner or context that presents an immediate danger to the safety of the person involved, they must use their best judgment to resolve the situation safely. Once you are out of immediate danger, report the threat to the local authorities and your actions to your manager and the Compliance Manager.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



6.9. Suspicion of Internal Violations

6.9.1. Duty to Report

Employees, board members and directors of the Renova Foundation must immediately report to the Compliance department any knowledge or reasonable suspicion that a person associated with the Foundation has violated or intends to violate this Policy. Failure to report violations may result in consequences as severe as those violations, including disciplinary action.

The Foundation encourages anyone with suspicions to be as transparent and honest as possible when reporting the matter, as this will contribute to a thorough and effective response to the situation. The Foundation will investigate reports discreetly and confidentially and will use its best efforts to keep the identity of the complainant confidential.

The Foundation maintains a confidential channel for reporting suspected violations of this or other policies, Code of Conduct and national and international anti-corruption legislation. Reports can be made through the website Confidential Channelemail canalconfidencial@fundacaorenova.org or phone 0800 721 0717.

6.9.2. Retaliation prohibited

No employee (including board members and directors) of the Renova Foundation may initiate, participate in or tolerate any form of relationship against someone who has raised genuine suspicions about compliance with this Policy. Retaliation is justification for disciplinary action, including dismissal.

Any suspicion of retaliation must be immediately reported to the Compliance department. All allegations of retaliation will be vigorously investigated as violations of this Policy., as provided for in non-retaliation policy.

6.10. Investigations and Audits

6.10.1. Authority and Responsibility to Investigate

The Compliance department is responsible for coordinating and supervising investigations of allegations of violations to this Policy, including any situations relating

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

to retaliation. The Compliance department must ensure that all allegations of violation to this Policy are screened in a timely manner, treated seriously, rigorously investigated and evaluated fairly. No investigation of a violation or potential violation may be completed without the express consent of the Compliance department.

6.10.2. Requirement of Discretion

Any employee (including board members and directors) of the Renova Foundation involved in an investigation must carry out preliminary investigations into allegations of violation of this Policy discreetly, whenever possible, until evidence is discovered.

6.10.3. Confidentiality

If requested by a whistleblower, any employee (including board members and directors) of the Renova Foundation involved in an investigation must keep the whistleblower's identity confidential as much as possible.

6.10.4. Authority and Responsibility to Audit

The Compliance Manager must, directly and in conjunction with external auditors, regularly audit, evaluate, test and measure the effectiveness of the Compliance Program and this policy.

6.10.5. Duty to Cooperate

Employees (including board members and directors) of the Renova Foundation must cooperate fully with any investigation or audit. This includes full cooperation with any internal audit team, external auditors or external legal counsel.

6.10.6. Overlap with Other Departments

The Compliance department defines the scope of Investigations and can use resources from other departments to support investigations of potential violations.

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

6.10.7. Record Keeping

The Compliance department is responsible for recording all reported violations, as well as documenting the Foundation's response to each of them. These records must be kept for at least 5 years.

6.10.8. Issuance of Reports

The Compliance Manager shall issue periodic reports regarding investigations, enforcement actions and significant findings of any audits relating to this Policy for the Board of Governors.

6.11. Consequences of Violations

6.11.1. Potential Violations

- Willfully or intentionally violate the law or this Policy;
- Direct others to violate the law or this Policy;
- Failing to cooperate in an investigation into possible violations by others;
- Retaliate against any employee or third party or supplier for reporting a suspicion or violation; and
- Not effectively monitoring the actions of subordinates.

6.11.2. Potential Legal Consequences

Violations of these policies or of any anti-corruption legislation may result in substantial fines for the Foundation and its Stakeholders, as well as legal action for damages to third parties against the Foundation and its Stakeholders, and criminal prosecution and possible imprisonment of individuals personally involved:

6.11.3. Potential Labor Consequences

Disciplinary action will depend on the seriousness of the violation and other relevant circumstances. The Foundation will apply disciplinary actions in accordance with the Consequence Management Policy, which includes, but is not limited to, termination of employment contract (dismissal).

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public

7. Items revised from the last version

POL version	What has changed
01	Change in Prior Approval Requirement items; Added Expense Reconciliation/Reimbursement Form. Exclusion of the item "Board and Stakeholder Reports"; Change of the topic "Third Parties Meeting Our Standards"; Mandatory Initial Training Deadline changed from 30 days to 60 days; Added information about the reporting channel; Change to the item "Potential Labor Consequences".
02	The "Objective" item has been changed, with corrections to the legislation information; Changed the item "Target audience"; Changed the item "Complementary Documents"; Changed item "Responsibilities"; Adequation of document formatting.
03	Item 1 regarding "Objective" has been changed, adapting it to the applicable legislation; Item 5 has been changed regarding the concept of "Gifts" and the inclusion of "Benefits" and "Presents"; Item 6.3 regarding the Gifts, Presents and Hospitality process has been changed; Adaptation in writing with few adjustments.
04	Changed concept of public official in item 5; Changed concept of business partner in item 5; Added concept of employees in item 5; Change on item 6.3.3 of the max value of benefits that can be granted/received without prior approval; Included observation on the concept of hospitality in item 6.3.9; Included observation on conditions authorized in the rules regarding corporate travel.
05	Specific changes to the wording of the policy; Inclusion of the term "third parties" in the definition of the concept of "employee"; Items 6.4.2a: replacement of the term "Due Diligence" with "Third Party Analysis" and adaptation of the text; Item 6.3.5: information was added about the need for approval of the request by the technical manager or technical director, if applicable.
06	Added the topic "Introduction" to state that the Renova Foundation commits to combating fraud and corruption in all its areas of operation; Changed the definition of "Business Partner" to include third parties who represent Renova as "Business Partners"; Included "pre-candidate" in the definition of public official; Expanded the details of the concept of "due diligence," considering the definition described in the due diligence procedure (PG-CAU-003); Added an exception in item 5.3.3 – Requirement of Prior Approval for the following situations: when: a) employees, direct third parties, or collaborators of the Renova Foundation participate in corporate events or internal training in "working conditions," with the provision of gifts or hospitality; b) when Renova areas wish to give gifts or presents to Renova employees themselves; c) when it involves institutional gifts (items of nominally low value, negligible or of no commercial value, that carry the institutional brand of a company or institution); Added an exception in item 5.3.4 – Exception for prior approval/Regularization: hospitality for participation in public hearings, meals during protests; Included a rule on cumulative values, applicable only to cases involving concessions;

Code:	POL-CAU-001
Revision Nº:	06
Developed by:	Roberta Guasti Porto
Approved by:	Board of Governors
Data of approval:	17/07/2024
Frequency of review:	Biennial
Classification:	Public



POL version	What has changed
	Added a rule regarding the frequency of concessions/receiving; Included a reference to the Non-Retaliating Policy; Excluded item 5.3.9; Excluded item 6.10.8; Added the definition of "third parties"; Revisions and improvements in the document's wording.

8. Annexes

Not applicable.