 ecoRODOVIAS	NORMATIVE INSTRUCTION	Number NI / 2022 / 009
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1. CONSIDERATIONS AND OBJECTIVES

This Normative Instruction (NI) on Integrity Analysis (“Normative Instruction”) sets the guidelines for carrying out the Integrity Analysis of individuals and legal entities regarding the anti-corruption law and the Ethics Program – Integrity System (EP - IS) of the EcoRodovias Group (“EcoRodovias”).

2. APPLICATION

The provisions herein apply to all employees across all units of EcoRodovias.

3. APPENDICES:

- Appendix I – Criticality Matrix – Preliminary Checklist;
- Appendix II – Contracting Checklist;
- Appendix III – Third Party Checklist;
- Appendix IV – Impact Matrix;
- Appendix V – Anti-Corruption Certificate.

This Normative Instruction shall be effective for two (2) years, when it must be revised by the Compliance & Governance Department. It may also be revised at any time, whenever new risks are identified.


This Normative Ruling comes into effect on this date and **revokes EcoRodovias Normative Instruction NI/2020/019 – Integrity Analysis.**

São Paulo, March 21, 2022.




Marcello Guidotti
Chief Financial and Investor Relations Officer

Rodrigo José de Pontes Seabra Monteiro Salles
Chief Legal Officer

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1. DEFINITIONS

- Government Official: any person holding a public position, employment or duty, whether appointed or elected, even if temporarily and without compensation. These include individuals holding public position, employment or duty in government entities, departments or agencies of the direct or indirect public administration, government-controlled companies, Brazilian and foreign public foundations, international organizations, political parties and candidates for political office in Brazil and abroad.
- Integrity Analysis: process for preventive assessment of potential corruption, bribery, reputation and integrity risks, conducted by the Compliance & Governance Department for certain individuals or legal entities related to EcoRodovias.
- Employee: includes, individually or jointly, any and all employees, interns, executive officers, administrators or directors acting on behalf of EcoRodovias.
- Delegated Procurement: acquisitions of goods or services to support the company's activities that, due to the nature of the contract, can be delegated to the requesting areas.
- Transactional Procurement: routine replacement purchases transacted via the Corporate Procurement System.
- Strategic Procurement: purchases of goods or services directly connected to the company's core business that require complex specifications and directly impact the outcome of EcoRodovias' business.
- Critical Scope: classification of the object of the acquisition of goods or services as defined in the Criticality Matrix - Preliminary Checklist (Appendix I) that entails the need to perform an Integrity Analysis by the Compliance & Governance Department.
- Contract Manager: formally appointed employee of the User Area, in charge of the physical/financial management of the contract object and for ensuring the strict compliance with the contractual clauses, including the monthly measurement of the contracted services and their related indicators, compliance with deadlines, cost and quality.
- Impact Matrix: instrument used by Compliance & Management to categorize the Points of Attention of third parties according to EcoRodovias' possible risk exposure in its relationship with these third parties, as well as to guide the Executive Board on the management of potential corruption and bribery risks to which EcoRodovias may possibly be subject.
- Business Partners: union of two or more companies, temporary or not, for exploring a certain business. For the effects of this Normative Instruction, partnership contracts, specific purpose companies, consortiums are examples of Business Partners.
- Politically Exposed Persons (PEPs): Government Official who holds or has held, in the last five years, in Brazil or abroad, a relevant public position, job or function, as well as

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their family members, close employees and legal entities in which they participate.

- **Points of Attention:** situations listed in the Impact Matrix that, if detected, should be analyzed with greater caution because they represent greater exposure of EcoRodovias to potential corruption and bribery risks.
- **Third Parties:** any natural or legal person acting on behalf, in the interests or for the benefit of EcoRodovias, providing services or other goods, including, but limited to, agents, consultants, brokers, suppliers or other service providers, irrespective of any written contract.

2. GENERAL RULES

This Normative Instruction seeks to meet the parameters set in Decree 8,420/20, which regulates Law 12,846/13, as well as the EP - IS based on ABNT Standard NBR ISO37001, by establishing guidelines for following proper procedures for the hiring and monitoring of:

- Third Parties;
- New Employees;
- Benefitted Entities; and
- Business Partners.

These diligence procedures are conducted through an Integrity Analysis carried out by the Compliance & Governance Department so as to assess the potential risks of corruption and bribery to which EcoRodovias is exposed in these relationships.

The relationship between these parties and EcoRodovias must be conducted with strict transparency and be backed up by documents that contain detailed information about the need for the contract, price and form of payment, as well as by precise description of the goods and/or services that will be supplied, without prejudice to the other requirements set forth in the Normative Instruction on the Guidelines for Acquisition of Goods and Services or other guidelines of the EcoRodovias' Supplies Department.

All individuals or legal entities presenting potential corruption and bribery risks to EcoRodovias, as defined in the criteria set forth in this Normative Instruction, must be submitted to the Integrity Analysis process.


3. RESPONSIBILITIES

3.1 Executive Board

- a. Highest authority to approve this Normative Instruction;
- b. Resolve and approve, upon proposal of the Compliance & Governance Department, the hiring of Third Parties with Medium and High Impact Points of Attention.

3.2 People Management Department

- a. Inform in advance the Compliance & Governance Department before proceeding with the hiring of a new Employee for the positions or areas listed in item 12; and

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- b. Inform in advance the Compliance & Governance Department about internal Employee transfers for the positions or areas listed in item 12 of this Normative Instruction.

3.3 Compliance & Governance Department

- a. Conduct Integrity Analyses, including their periodical updates;
- b. Propose control measures to reduce the potential risks identified;
- c. Submit for the Executive Board's consideration a report with a critical analysis about the hiring of Third Parties with medium and high Impact Points of Attention;
- d. Monitor the implementation of the mitigation plan approved by the Executive Board;
- e. Where applicable, block third parties as determined by the Executive Board;
- f. Coordinate and monitor anti-corruption training and signature of the anti-corruption and anti-bribery certificate for Third Parties¹ that perform the activities described in the Criticality Matrix - Preliminary Checklist;
- g. Keep the list of blocked and validated Third Parties updated and properly disclosed to related Employees;
- h. Monitor compliance with this Normative Instruction; and
- i. Review this Normative Instruction when necessary or at every two years.

4. ANALYSIS OF THIRD PARTIES

4.1 Criteria to define if Third Parties should be subject to Integrity Analysis: Criticality Matrix – Preliminary Checklist

At the initial stage of the request, the Contract Manager or his/her designated Employee must check the supplier status in the corporate system (blocked or unblocked) and fill out the Criticality Matrix - Preliminary Checklist (Appendix I) that indicates situations that show greater exposure of EcoRodovias to potential corruption and bribery risks.

If the reply indicates "Critical Scope", the Compliance & Governance Department will be required to perform an Integrity Analysis, according to the guidelines detailed below.


It will not be necessary to fill out Appendix I for amendments, except if:

- a. the overall value of the contract (including the amendment) exceeds R\$ 5 million and/or the contract object is changed; or
- b. the amendment includes a subcontractor for performing the critical service. In this event, Appendix I must also be filled out by the subcontractor.

4.2 Supplementary forms – Contracting Checklist and Supplier Checklist

After defining the Third Party in the contracting process, according to the rules provided in the Normative Instruction - Guidelines for the Acquisition of Goods and Services, the

¹ The anti-corruption training and certification are being improved in the corporate system; therefore, during the transition period, training may be coordinated and monitored by the Compliance & Governance Department or carried out via corporate system.

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Contract Manager or Employee designated by him/her must submit the following completed forms to the Compliance & Governance Department:

- a. Criticality Matrix – Preliminary Checklist;
- b. Contracting Checklist – to be filled out by the Employee (Appendix II); and
- c. Third Party Checklist – to be filled out by the Third party’s representative (Appendix III).

The Contract Manager is responsible for the information listed in these documents as well as for checking the completion of the Contracting and Third Party Checklists.

The Contracting and Third Party Checklists can be electronically signed and sent to the Compliance & Governance Department, or via email by the Contract Manager to the Compliance & Governance Department (grupocompliance@ecorodovias.com.br).

4.3 Subcontractors

If the Third Party indicates that it intends to subcontract other companies to comply with its contractual obligations, and if the Criticality Matrix - Preliminary Checklist also indicates Critical Scope for this outsourcing, the subcontractor must be subject to an Integrity Analysis in simplified form with its scope related to restrictive lists (CEIS, CNEP, CEPIM, Slave Labor, and Ibama Embargo Term).


4.4 Third Party Integrity Analysis

The Compliance & Governance Department shall perform the Integrity Analysis within five (5) working days from receipt of the three (3) Checklists (Criticality Matrix - Preliminary Checklist, Contracting Checklist, and Third-Party Checklist) duly filled out, and within two (2) working days in the case of contingency contracting, provided that no points of attention requiring clarification from the Third-Party have been identified. For emergency contracting, the Compliance & Governance Department shall perform the Integrity Analysis concurrently with the contracting process. Should the Compliance & Governance Department identify relevant Points of Attention, it must report them to the Executive Board for application of the risk mitigation plan, prepared based on the measures described in item 5 of this Normative Instruction.

4.5 Integrity Analysis Report

A report shall be issued with evidence of the surveys conducted by the Compliance & Governance Department, so as to assess potential corruption and bribery risks of this Third Party, as well as whether the Third Party has formal integrity mechanisms and procedures in place.

If the integrity analysis does not indicate Points of Attention, the Compliance & Governance Department shall inform the Contract Manager that the approval of the Third

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Party is recommended, provided that the Compliance² control measures are implemented, such as:

- a. Inclusion of the anti-corruption clause;
- b. Anti-corruption and anti-bribery training;
- c. Signature of the anti-corruption and anti-bribery certificate; and
- d. Additional measures according to the contracting risk (periodic declarations of compliance and/or commitment terms related to integrity and non-influence in case the partners are Government Officials).

4.5.1 Third Parties validated by the Compliance & Governance Department

The Compliance & Governance Department shall disclose monthly the list of validated Third Parties, which shall be exempt from a new Integrity Analysis for a period of two (2) years. After this term, the Compliance & Governance Department shall revalidate the analysis, as detailed in item 7.

4.5.2 Points of Attention

4.5.2.1 Low Impact Points of Attention

They must also be approved by the Compliance & Governance Department upon the adoption of the control measures indicated in item 4.5.

4.5.2.2 Medium and High Impact Points of Attention

If the Third Party has a Medium or High Impact Point of Attention, the Compliance & Governance Department must submit the report for the Executive Board's decision.


Before submitting its recommendation to the Executive Board, the Compliance & Governance Department may request explanations and documents from the Third Party regarding the Points of Attention identified.

Pending a decision by the Executive Board, payments to Third Parties with Medium and High Impact Points of Attention shall be monitored by the Compliance & Governance Department.

The Executive Board, after exposure of the Points of Attention by the Compliance & Governance Department, can adopt the following measures:

- a. Approve the Third Party;
- b. Partial blocking:
 - Approve the Third Party and subject any future contracting to the prior approval of the Executive Board; or

² Measures "b" and "c" may be coordinated and monitored by the Compliance and Governance Department or carried out via corporate system.

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- Reject the Third Party, but do not terminate effective contracts.
- c. Full blocking: Reject the Third Party and terminate effective contracts.

The Executive Board's resolution to adopt any of the above measures shall be made by majority vote and be registered in specific minutes or via email, together with the information from the Compliance & Governance Department about the Third Party and supported by the respective mitigation plan proposed.

Should any High Impact Point of Attention be identified, the Third Party must be approved by the Executive Board at every new hiring.

In case any Medium Impact Point of Attention is identified, the Third Party shall be approved by the Executive Board on the first hiring, and shall be monitored continuously by the Compliance & Governance Department.

4.5.3 Blocked Third Parties

Third parties fully blocked by the Executive Board shall be recorded as such in the base of active suppliers and barred from entering into contracts with EcoRodovias.


Any contract with and/or payment to blocked suppliers without the authorizations established in this Normative Instruction is considered a serious breach and is subject to disciplinary action.

Blocking a Third Party has no validity period, so that this third party will remain blocked until the Compliance & Governance Department conducts a new Integrity Analysis and makes a recommendation to the contrary.

4.5.3.1 Exception

Provided they are authorized by the Executive Board, rejected Third Parties may, exceptionally, be hired when it is not feasible to choose other competitors, as in the cases listed below:

- a. Exclusive third party;
- b. Specialized technical services provided by the Third Party that sets it apart from other competitors; or
- c. Other exceptional situations, as long as the indispensable nature of the contracting is evidenced.

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4.5.3.2 Unblocking Third Parties

Third Parties may be unblocked by the Executive Board, upon recommendation of the Compliance & Governance Department, in the event the Third Party is found to have taken measures to remedy the wrongdoing (e.g.: removing those responsible, conducting an internal investigation, etc.) and, furthermore, to have implemented the Integrity Program, in line with internal mechanisms and procedures, auditing and incentives to report irregularities, together with the effective application of Codes of Conduct, Policies and Guidelines aimed at detecting and remedying misconduct, frauds, irregularities and illicit acts carried out against the public administration, in accordance with Article 42 of Decree no. 8,420/15.


5. RISK MITIGATION PLAN

If the Third Party is approved by the Executive Board under the above conditions, the Compliance & Governance Department may propose the following control measures to reduce the potential risks identified:

5.1 Mandatory

- a. Biannual reports: the Compliance & Governance Department shall verify contracts involving Third Parties with medium and high impact Points of Attention and shall provide the Executive Board with a report on these contracts.
- b. Periodical monitoring: the Compliance & Governance Department shall monitor the Third Party with the purpose of following up possible developments regarding the Points of Attention identified during the Integrity Analysis. Monitoring shall be conducted at intervals of not more than one hundred and eighty (180) days and include an update of the analyses of previously identified Points of Attention. Also, if necessary, it shall include a request for information from the Third Party about the Point of Attention (e.g. clarifications, copies of processes and/or procedures).
- c. Anti-corruption and anti-bribery clause: contracts shall contain a clause approved by the Compliance & Governance Department including, but not limited to:
 - Commitment to anti-corruption law;
 - Provision for contract termination in the event of acts harmful to the Public Administration; and
 - Payment of damages in the event EcoRodovias is held accountable for acts of this nature.

Any change to the anti-corruption and anti-bribery clause shall be previously approved by the Compliance & Governance Department.

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- d. Anti-corruption and anti-bribery training.
- e. Certificate: signature of the anti-corruption and anti-bribery certificate by the Third Party's representatives.

5.2 Optional

- a. Transaction tests: the Compliance & Governance Department may also, at its sole discretion, conduct periodic transaction tests regarding contracts with this Third Party.
- b. Information regarding the Integrity Program: the Compliance & Governance Department may request the Third Party to provide information and evidence about the Integrity Program.
- c. Periodical Statement of Compliance by the Third Party: the Compliance & Governance Department may request periodical compliance statements for the Third Party to attest that it has not engaged in any conduct related to the practice of bribery, corruption, fraud, etc.

6. THIRD PARTY MONITORING

Every one hundred and eighty (180) days, the Compliance & Governance Department shall monitor any Third Party with points of attention identified during the Integrity Analysis, in accordance with the criteria established in a specific Work Instruction.

7. THIRD PARTY REVALIDATION

After two (2) years from the validation of the Third Party, the Compliance & Governance Department must verify in the internal corporate system whether the Third Party still has active contracts with EcoRodovias, and the following measures must be taken:


- a. Has active contracts: a new Third Party Integrity Analysis will need to be performed.
- b. Has no active contracts: there will be no need for revalidation, but this Third Party must undergo a new Integrity Analysis if hired in the future and if it falls within the scope of critical contracting.

If the Third Party has no active contract, it must be blocked by the Compliance & Governance Department.

8. MONITORING BY THE INTELLIGENCE SYSTEM

Twice a year, the Compliance & Governance Department shall perform a control for mitigation of corruption and bribery risks of all active Third Parties via the intelligence system, when applicable.

This control shall be made in accordance with the guidelines defined under a specific Work Instruction.

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9. ON-DEMAND INTEGRITY ANALYSES

The Compliance & Governance Department may perform integrity analyses at the request of employees who identify any situation of suspicion or probability of irregularities by third parties that may involve EcoRodovias.

10. BUSINESS PARTNERS

The Integrity Analysis also applies to the following relationships of EcoRodovias with Business Partners and Third Parties:

- a. Consortiums;
- b. Donations and sponsorships, according to the rules established under the Donation and Sponsorship Normative Instruction.

Integrity analyses shall also be carried out in the case of joint ventures, consolidations, mergers and acquisitions, in accordance with the rules under the Normative Instruction for Corporate Transaction Integrity Analysis.

11. EXCEPTIONS


Contracts involving the following are exceptions to the procedure listed in item 4 of this Normative Instruction:

- a. EcoRodovias' related parties, whose approval is set according to the guidelines of the Related Parties Normative Instruction;
- b. Concessionaires providing public utility services, such as electricity, water, sewage, and transport, among others;
- c. Transactional contracting via purchase requisition;
- d. Insurance contracting of less than R\$ 5 million, which by their nature are considered non-critical;
- e. Commercial Partnerships with Third Parties for the benefit of EcoRodovias' Employees; and
- f. Ancillary revenues that may be established in concession contracts.

The exceptions listed above do not prevent the Compliance & Governance Department from monitoring these third parties through Intelligence Systems or carrying out Integrity Analysis whenever it deems necessary, especially when there is suspicion or probability of irregularities on the part of these Third Parties.

12. INTEGRITY ANALYSIS OF NEW AND TEMPORARY EMPLOYEES

In the case of hiring new and/or temporary Employees for any of the positions or areas listed below, the Compliance & Governance Department must also conduct an Integrity Analysis based on the parameters set forth in item 4, as applicable.

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- a. Members of the Board of Directors;
- b. Leadership positions, such as Corporate and Executive Officers, Managers and Coordinators);
- c. Information Technology Department, except for maintenance assistant, maintenance technician, and electronic technician positions;
- d. Supplies Department;
- e. Business Development Department; and
- f. Compliance & Governance Department.

The requirement for Integrity Analysis will also be applicable to internal moves related to any of the above positions.

The Compliance & Governance Department, together with the People Management Department and related officers must give an opinion to the Executive Board on the hiring or moving of people who have Points of Attention.

For the purposes of this topic, we consider as Points of Attention any negative media, investigations, proceedings or lawsuits related to corruption, bribery, crimes against the public administration, and fraud in general

13. DISCIPLINARY MEASURES


Employees who violate the provisions of this Normative Instruction will be subject to the corresponding disciplinary measures, which may include warning, suspension or termination with cause, in accordance with the Normative Instruction on Disciplinary Measures.

Without prejudice to the applicable disciplinary measures, EcoRodovias may pursue the necessary legal measures to remediate any damages caused by the Employee.

14. CONTACT

It is essential that all Employees governed by this Normative Instruction immediately report any actions or suspicious actions of bribery, corruption, fraud and/or payment/receipt of bribery, Improper Advantage and other situations and conduct that violate this Normative Instruction and/or the Code of Conduct, anonymously or otherwise, through the EcoRodovias Ethics Channel at: (i) <https://www.canaldeetica.com.br/ecorodovias/#>; (ii) the toll free number 0800 025 8841 (Brazil only); and/or (iii) at the headquarters of EcoRodovias Concessões e Serviços (address: Rodovias dos Imigrantes, km 28,5 s/n, cep 09845-000, São Bernardo do Campo/SP).

For further information and/or any questions, contact the Compliance & Governance Department at grupocompliance@ecorodovias.com.br.


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15. REFERENCES


- Code of Conduct;
- Code of Conduct for Third Parties;
- NI on the Ethics Program – Integrity System (PE - SI);
- NI on Corporate Transactions;
- NI on Anti-corruption and Anti-bribery;
- NI on Donations and Sponsorships;
- NI on Antitrust Practices;
- NI on Gifts and Presents;
- NI on Interaction with Government Officials;
- NI on Conflict of Interest;
- NI on Integrity Analysis of Corporate Transactions;
- NI on Internal Investigations;
- IT of Integrity Analysis; and
- NI on Acquisition of Goods and Services.


16. HISTORY AND VERSION CONTROL

Version	Date	Item
1.0	2020	Creation of document (NI/2020/019).
2.0	2022	Revision of document (NI/2022/009).

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APPENDIX I – CRITICALITY MATRIX – PRELIMINARY CHECKLIST


 PRELIMINARY CONTRACTING OF THIRD PARTIES			
Contract Manager:	Position:	Phone:	Date:
Partner (if defined):		Contract amount established:	
Scope of contract:		Non-critical contracting	
Does the Third Party fit into any of the options below?			Answer
1.1 Will represent EcoRodovias at government agencies or interact with civil servants on behalf of the company			
2.1 Consultants / Consulting Firms			
3.1 Forwarding agent			
4.1 Provider of licensing, permit services or obtention of any government authorization (including regulatory)			
5.1 Lobbyist			
6.1 Agent and Intermediary			
7.1 Distributor or Sales Representative			
8.1 Law firm representing EcoRodovias with government agencies or that has any interaction with civil servants on behalf of the company			
9.1 Will perform activities subject to the inspection of government agencies			

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APPENDIX II – CONTRACTING CHECKLIST

To:
From:
Position and Department:
Unit:
Ref.: Preliminary Assessment of [include company name + CNPJ (“THIRD PARTY”)]

1. ECORODOVIAS proposed the THIRD PARTY to provide the following services:	
Answer:	
2. These services will be provided in the following locations (City/State):	
Answer:	
3. How will the THIRD PARTY be paid?	
Monthly amount <input type="checkbox"/> Lump sum <input type="checkbox"/> Other <input type="checkbox"/>	
4. The THIRD PARTY was indicated or recommended by someone outside EcoRodovias.	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, who? (name, company, position)	
5. The THIRD PARTY requested payment in a place other than where the services will be provided.	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
6. The THIRD PARTY requested any unusual form of payment, such as payments made through third party companies, large amounts of cash, transfers to several bank accounts, payments to third parties not listed in the contract.	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
7. The THIRD PARTY showed unusual traits, such as maintaining an excessive degree of confidentiality about the contracting or refusing to keep any records.	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
8. Is there any suspicious activity or any other circumstance indicating that the THIRD Party’s assets have come from an illegal activity?	
Answer:	
9. Will any powers of attorney be granted to the THIRD PARTY for representing ECORODOVIAS?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>

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10. Has a relationship with a Government Official been planned in the partnership with ECORODOVIAS?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
11. The type of contract to be executed with the THIRD PARTY is:	
Service Provision in General <input type="checkbox"/> Supply of Products <input type="checkbox"/> Consultancy <input type="checkbox"/> Publicity or Marketing <input type="checkbox"/> Commercial Partnership <input type="checkbox"/> Other <input type="checkbox"/>	
12. THIRD PARTY's main representatives with whom I have contact:	
Name: Position: Contact:	
13. Other ECORODOVIAS employees who participated significantly in this assessment/negotiation:	
Name: Position: Contact:	
14. I believe ECORODOVIAS should sign the contract with the THIRD PARTY for the following reasons:	
Answer:	
15. In my opinion, the THIRD PARTY is able to perform the object of the contract because:	
Answer:	
16. Is there any reservation or remark about the ethical character of the THIRD PARTY, its representatives, consultants, agents, partners, shareholders, directors and/or managers and employees?	
Answer:	
17. Is there any further relevant information regarding this analysis that has not been addressed in this form? If so, please provide more details.	
Answer:	
Name: Position: Signature: _____ Date:	


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APPENDIX III –THIRD PARTY CHECKLIST

Corporate name:
CNPJ (Corporate Taxpayer ID):
Email:

1. Name, CPF (Individual Taxpayer ID) and position of the persons who are not partners and/or managers of the Third Party		
Name	CPF	Position
2. For closed corporations: name, CNPJ, and ownership interest of the legal entities that are controlling shareholders of the Third Party		
Name	CNPJ	Ownership interest
3. Name, CNPJ and ownership interests of the Third Party's subsidiaries		
Name	CNPJ	Ownership interest
4. In the last five years, was or is any administrator, executive officer, manager, shareholder or partner a Government Official³?		
<input type="checkbox"/> Yes		<input type="checkbox"/> No
If yes, inform the name, position, agency and period.		

3. A Government Official is any person holding a public position, employment or duty, whether appointed or elected, even if temporarily and without compensation. This definition includes individuals holding public position, employment or duty in government entities, departments or agencies of the direct or indirect public administration, government-controlled companies, Brazilian and foreign public foundations, international organizations, political parties and candidates for political office in Brazil and abroad.

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5. Are any of the administrators, executive officers, managers, shareholders or partners a family member or have family, commercial or other ties with anyone who is or has been a Government Official in the last five (5) years?

<input type="checkbox"/> Yes	<input type="checkbox"/> No
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If yes, inform the type of relationship and the Government Official's name, position, agency and period.

6. Does the Third Party or any of its administrators, executive officers, managers, shareholders or partners have a relationship with ministers, government officials, congress members, or government agencies?

<input type="checkbox"/> Yes	<input type="checkbox"/> No
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If yes, inform the type of relationship and the Government Official's name and position.

7. Identify all subcontractors that the Third Party intends to use for implementing the contract with EcoRodovias

Corporate Name	CNPJ	Service scope

8. Does the Third Party have a Code of Ethics and/or anti-corruption, anti-bribery and ethics policies?

<input type="checkbox"/> Yes (please forward)	<input type="checkbox"/> No
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9. List any entities and/or government agencies with which the Third Party has dealings related to the nature of the business to be signed with EcoRodovias.

Answer:

10. In the last five years, have the Third Party and/or any of its administrators, executive officers, employees, partners, members or shareholders responded to any questionings, investigations, inquiries or lawsuits related to the Third Party's business activities, for example, those related to administrative misconduct, corruption, money laundering, bribery, amounts paid directly to Government Officials, and so on?

<input type="checkbox"/> Yes (please give more details – send relevant documentation).	<input type="checkbox"/> No
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Description of Case	Year and Place	Status

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11. In the last five years, have the Third Party and/or any of its administrators, executive officers, employees, partners, members or shareholders responded to any inquiry or lawsuit related to child labor or slave labor?


<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Description of Case	Year and Place	Status

Name: Position: Signature: _____ Date:

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APPENDIX IV – IMPACT MATRIX

Criticality	Point of Attention
Low	Negative media prior to the last 5 years [e.g.: Operation by the Federal Police/Federal Prosecution Service (MPF), mention in a plea bargain, etc.]
	Third party/partner with ownership interest in a company or with a partner involved in corruption/fraud
	No formal integrity procedures and mechanism [Code of Conduct, Anti-corruption policy, anti-corruption training, etc.]
Medium	3 low impact points of attention
	Negative media in the last 5 years
	Third party with shareholding in a Consortium involved in corruption or fraud
	Company of the Economic Group involved in violation of anti-corruption law
	Ongoing civil/criminal investigation relating to violation of anti-corruption law
	Ongoing Administrative Proceeding related to violation of anti-corruption law
	Ongoing Public Civil Action / Administrative Misconduct Action related to violation of anti-corruption law
	Ongoing criminal lawsuit relating to violation of anti-corruption law
High	Partner and/or member of the Company's senior management is a Politically Exposed Person (PEP)
	Allegation of violation of anti-corruption law involving EcoRodovias
	3 medium impact points of attention
	Third Party or Economic Group included in a restrictive list [e.g., CEIS (National Register of Disreputable or Suspended Companies), CNEP (National Register of Punished Companies), CEPIM (Registry of Ineligible Private Non-Profit Entities)]
	Conviction in an Administrative Proceeding related to violation of anti-corruption law
High	Conviction in a Public Civil Action or Administrative Misconduct Action relating to violation of anti-corruption law
	Criminal conviction relating to violation of anti-corruption law

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**APPENDIX V – ANTI-CORRUPTION AND ANTI-BRIBERY
CERTIFICATE**


[...] enrolled with the Individual Taxpayer's Register (CPF/ME) under no. [...], legal representative of [...] ("Third Party"),
attests:

- That he/she attended the training on the Third Party Code of Conduct and the Anti-Corruption and Anti-Bribery Policy given online by EcoRodovias;
- That he/she is fully aware of the Third-Party Code of Conduct⁴ and the Anti-Corruption and Anti-Bribery⁵ Policy, and that he/she undertakes not to engage in any act or omission in fulfilling the responsibilities established in said document;
- That he/she is aware and undertakes to comply, and cause the Third Party, other administrators, employees or third parties acting on behalf of the Third Party to comply, with any and all applicable anti-corruption law related to the prevention of money laundering, including but not limited to the Anti-Corruption Law (Law no. 12,846/13), Decree No. 8,420/15, Administrative Misconduct Law (Law no. 14,230/2021), Bidding Law (Law no. 8,666/93 and Law no. 14,133/2021), Criminal Code (Decree-Law no. 2,848/40), as well as other related regulations, ordinances, and normative instructions ("Anti-Corruption Law");
- That he/she undertakes to adopt internal disclosure measures about the content of the training and the Third Party Code of Conduct and Anti-Corruption and Anti-Bribery Policy, as well as any other integrity rule of EcoRodovias so as not to engage in any act or omission that infringes the Anti-Corruption Law.
- That during the Third Party's activities related to the performance of this or any other contract with EcoRodovias, the Third Party will comply in full with the entire Anti-Corruption Law, undertaking to refrain from any activity that violates the provisions of these rules;
- That neither the Third Party nor any manager, employee, or third party acting on behalf of the Third Party has violated the Anti-Corruption Law;

⁴ Available at EcoRodovias website

(https://wappstorage.blob.core.windows.net/assets/ecorodoviasportal/files/pdf/ECO_C%C3%B3digo_de_Conduta_Terceiros.pdf)

⁵ Available at EcoRodovias website (https://wappstorage.blob.core.windows.net/assets/ecorodovias-portal/files/pdf/2021/Anticorrupc%C3%A7%C3%A3o%20e%20Antissuborno%20IN_2020_018.pdf)

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- That the Third Party or any manager, partner, executive officer, employee or third party acting on behalf of the Third Party is not an investigated, indicted, sued, charged or convicted party for any claim of violation of the Anti-Corruption Law and agrees to promptly inform EcoRodovias if this declaration changes. Nonetheless, EcoRodovias may terminate the Contract at any time if it believes that there is a violation or risk of violation of the Anti-Corruption Law by the Third Party or any manager, employee or third party acting on behalf of the Third Party or that such a claim may cause a reputational risk to EcoRodovias;
- That the Third Party or any manager, employee or third party acting on behalf of the Third Party will not give, offer, pay, promise or authorize the direct or indirect payment of money or any valuables to any Government Official or any third party related thereto in violation of the Anti-Corruption Law;
- That EcoRodovias may request at any time evidence that the statements in this document remain true.

[Date and place]

Supplier's corporate name

Name:

Position:

⁶ Any person holding a public position, employment or duty, whether appointed or elected, even if temporarily and without compensation. These include individuals holding public position, employment or duty in government entities, departments or agencies of the direct or indirect public administration, government-controlled companies, Brazilian and foreign public foundations, international organizations, political parties and candidates for political office in Brazil and abroad.