

Number: PL.00.13	MANAGEMENT SYSTEM POLICY	
Revision: 02	Anti-Corruption Policy	
Date: 06/02/2025		
Rating: Public		

1. OBJECTIVE

green4T Participações S.A. and its subsidiaries ("green4T Companies") must undertake to conduct their business in a lawful, ethical, transparent and professional manner.

This policy aims to establish the guidelines, standards and procedures of the program to prevent and combat corruption so that green4T Companies can act in accordance with the Brazilian Anti-Corruption Law (Law No. 12,846/2013, regulated by Federal Decree No. 11,129/2022), with the American Anti-Corruption Law (U.S. FCPA – Foreign Corrupt Practices Act) and/or any specific law or regulation existing on the subject in any of the countries where green4T Companies are located Established. While the specific provisions of the laws may be different in each country where we do business, the spirit of anti-corruption laws is always the same.

2. SCOPE

Areas and Companies: Mandatory compliance for all Employees and Managers (Officers and Directors) of green4T Participações S.A. and subsidiaries ("green4T Companies").

3. RESPONSIBILITIES

3.1. EVERYONE

It is everyone's responsibility to know, disseminate and ensure compliance with the rules and guidelines contained in this policy.


This policy must be complied with even if, in certain respects, the applicable local laws are less stringent than the terms contained in it.

If you have any questions about the content of this policy and its application, please contact the Legal or Compliance Area of green4T Companies.

4. POLITICS

4.1. TERMS AND EXPRESSIONS

Term	Description
Administrator(s)	It means, when in the singular, the Statutory Directors and the members of the Board of Directors referred to individually or, when in the plural, the Statutory Directors and members of the Board of Directors referred to jointly.
Employee(s)	Employees hired under an employment contract and under the regime of the Law that governs the relationships where the work is performed, as well as interns, apprentice minors and temporary employees.

Number: PL.00.13	MANAGEMENT SYSTEM POLICY	
Revision: 02	Anti-Corruption Policy	
Date: 06/02/2025		
Rating: Public		

Term	Description
Intermediate Third(s)	Refers to hired professionals who are not Employees and/or Administrators who interact with Public Officials on behalf of or in the interest or benefit of green4T Companies, such as service providers, business partners (commercial representatives or consortium partners), attorneys-in-fact, dispatchers, etc.
Third party	Means the hired professionals who are not Employees and/or Administrators, but who work for the green4T Companies.
Related person(s)	Persons related to a Public Employee for any reason, including, without limitation, family members or relatives of a Public Official, such as spouse, partner, siblings, parents, children or stepchildren, grandparents, grandchildren, sons-in-law, daughters-in-law, uncles, nephews, brothers-in-law and in-laws.
Undue Advantage	The term "Improper Advantage" shall be interpreted broadly and includes any item (tangible or intangible) that has value or that may generate a commercial benefit or advantage to the recipient, including (without limitation) cash, cash equivalents (such as a gift card or gift card), gifts, travel, meals of excessive value, tickets, entertainment, hospitality, lodging, sponsorships, goods or services, loans, donations, discounts not available to the general public, insider trading, scholarships, and the promise or offer of employment.
green4T companies	They are all companies that make up green4T Companies, that is, all subsidiaries, affiliates and subsidiaries with equity interests in Brazil and abroad.
Corruption	Abuse of power or authority, committed by a person, to gain advantage for himself. The most common form of its practice is bribery.
Bribe	It consists of the offer, donation, receipt of something of value in exchange for favorable treatment by a company, official authority or public official.

Number: PL.00.13	MANAGEMENT SYSTEM POLICY	
Revision: 02	Anti-Corruption Policy	
Date: 06/02/2025		
Rating: Public		

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Civil Servant(s)	Any person who: (i) even if temporarily or without remuneration, holds a public position, job or function in any body or entity of the Public Administration or in a company contracted or contracted to perform an activity subject to concession by the Public Administration; (ii) holds a position, job or function in public or government-controlled companies, including mixed-capital companies, as well as in public foundations; (iii) is a member of a political party or is a candidate for political office; and (iv) holds a public office, job or function in organs, state entities or diplomatic representations of a foreign country, as well as in legal entities controlled, directly or indirectly, by the government of a foreign country or in international public organizations. Health Professionals can be considered Public Employees, when, for example, they work in any entity of the direct or indirect Public Administration, including in public hospitals or universities, even if temporarily or without remuneration.
Active Corruption	Offering or promising an undue advantage to a Public Official, to determine him to practice, omit or delay, an act of office.
Passive Corruption	The Public Employee who requests or receives, for himself or for others, directly or indirectly, even outside the function or before assuming it, but by reason of it, an undue advantage, or accepts a promise of such advantage.
Money Laundering	It is a set of commercial or financial operations that seek the incorporation into the economy of resources, goods and services that originate from or are linked to illicit acts.

4.2. RELATIONSHIP WITH PUBLIC OFFICIALS

The relationship with Public Officials must be guided by ethics and transparency. Managers and Employees of green4T Companies will maintain contact with Public Officials only when necessary, and at the premises of the public agencies to which they belong and/or at the premises of green4T Companies, in the exercise of their functions, in the latter case, whenever possible in the presence of two or more professionals from green4T Companies. This rule must also be observed by Third Party Intermediaries.

It is strictly forbidden to bribe, promise, offer or give, directly or indirectly, any Undue Advantage to domestic or foreign Public Officials or Related Persons.

The prohibition provided for in this policy applies both to conducts committed directly by green4T Companies or through any Third Party Intermediary, whether

Number: PL.00.13	MANAGEMENT SYSTEM POLICY	
Revision: 02	Anti-Corruption Policy	
Date: 06/02/2025		
Rating: Public		

an individual or a legal entity.

The express prohibition contained in this policy also applies to payments that aim to accelerate or expedite the practice of routine acts by Public Officials (e.g., issuing licenses, permits or authorizations; conducting inspections or visits) (known as "expedite", "expedite" or "urgency" payments or fees).

Such payments are expressly prohibited by this anti-corruption policy and may not be made, under any circumstances, either directly or through any Third Party Intermediaries.

Payments of additional fees for the acceleration of routine processes will only be allowed if expressly provided for by law and officially, paid directly to the public agency (through proper guides) and never to a Public Employee or intermediary, and provided that they are previously formally approved by the Legal and Compliance area of green4T Companies.

4.3. BIDS

green4T Companies and their Administrators, Employees and Third Party Intermediaries must strictly comply with all applicable local laws and standards regarding contracting with the Government. Everyone must act in accordance with the highest ethical standards and within the law when interacting with Public Officials and with competitors in the context of a public tender or other means of public procurement.

It is forbidden to practice, directly or indirectly, any act that may be understood as defrauding or frustrating bids, removing or seeking to remove competitors in a public bidding procedure, or practicing any act harmful to the Public Administration.

If you have any questions about how to relate to Public Officials, government agencies or competitors in the context of public bids or contracts, please contact the Compliance area.

4.4. HOSPITALITY, MEALS, GIFTS AND GIFTS

green4T Companies do not allow hospitality, meals, entertainment (sightseeing, sporting events, concerts, among others) to be paid to any Public Employee or Third Party, aiming to improperly influence or compensate an act or decision as actual or intended compensation for any benefit of themselves or the company.

green4T Companies will admit the payment of expenses related to travel, meals, entertainment or other business courtesies as long as they are closely related to the Company's business, are consistent with local law and observe the limits of amounts established by the Company.

Reimbursements of these expenses will only be made if accompanied by the submission of the **completed F.00.07** containing the approvals of the Commercial Director and Compliance Manager.

Only people directly connected to professional affairs are allowed invitations to meals (invitations to the wives, relatives and friends of the guest are prohibited).

4.5. RELATIONSHIPS WITH THIRD PARTIES

It is strictly prohibited to bribe, offer or authorize, directly or indirectly, any offer, promise of payment or payment in cash or by way of Undue Advantage, to any employee, agent or representative of a private company that has (or may have)

Number: PL.00.13	MANAGEMENT SYSTEM POLICY	
Revision: 02	Anti-Corruption Policy	
Date: 06/02/2025		
Rating: Public		

a business relationship with the green4T Companies, for the purpose of attempting to obtain undue interests or induce such employee, agent or representative to make any decision for the benefit of green4T Companies.

4.6. RESPONSES TO REQUESTS OR DEMANDS FOR IMPROPER PAYMENTS

If you receive a request for extraordinary payment or delivery of an Undue Advantage by any Public Official, Related Person or Third Party, explicitly and definitively refuse, and immediately notify your immediate superior and the Compliance Manager.

4.7. DONATIONS AND SPONSORSHIPS

Any donation or sponsorship must be made in a totally transparent manner and in line with current legislation.

All donations made to political parties and/or candidates for public office must follow the strictest legal and ethical standards, and must necessarily be in accordance with the requirements and limits established in local legislation. No Employee may use green4T Companies or private resources to make donations to political parties, electoral campaigns or candidates for public office on behalf of the company, without prior approval from the Chief Executive Officer and Chief Financial Officer with validation from the Legal or Compliance area.

Sponsorships must be based on contracts formalized between green4T Companies or any of the companies that make up their economic group, and institutions that will receive the sponsorship.

green4T Companies maintain an internal process for approving these sponsorships, and, when necessary, they must be approved in accordance with the current authority policy or by the Chief Executive Officer together with the Chief Financial Officer with validation from the Legal or Compliance area.

4.8. CONTRIBUTIONS AND CHARITABLE CAUSES

The policy of green4T Companies states that no contributions, sponsorships or donations should be made to charitable causes in exchange for favors with any Public Official, even if the beneficiary is a genuine philanthropic institution.

Contributions made to Institutions in which the Public Official, or a member of his family has a public function, or made at the behest of a Public Official, may raise suspicions of corruptive acts.

Donations should be made only for legitimate philanthropic reasons, such as to serve humanitarian, cultural, or educational interests. It will not be allowed to make a donation in exchange for favoring the company by a Public Official.

The approval of contributions, sponsorships or donations must respect the current authority policy and will observe the following procedure:

1. Requests must be made in writing, specifying, at least, the person or organization requesting the contribution, the purpose of the contribution and the amount requested;
2. Applications will be carefully reviewed to verify that the contribution will not provide personal benefit to any Public Employee and that the institution is registered under the terms of applicable local legislation;

Number: PL.00.13	MANAGEMENT SYSTEM POLICY	
Revision: 02	Anti-Corruption Policy	
Date: 06/02/2025		
Rating: Public		

3. The contribution must be made to the Institution and not to the individual, and under no circumstances will the payment be made in cash, or in deposit in a personal checking account;
4. Contributions will be previously approved by the Vice Presidents and Chief Executive Officer with validation from the Legal or Compliance area;
5. Necessarily, you must obtain proof of receipt of all contribution to the charitable cause that you make.

4.9. HIRING THIRD PARTY INTERMEDIARIES

No Third Party Intermediaries shall exert improper influence over Government Officials and shall not be appointed by Government Officials.

green4T Companies must verify that any of these Third Party Intermediaries are recognized for the practice of corruption or that they are being investigated, prosecuted or have been convicted. If so, green4T Companies must ascertain the facts and decide based on the results, taking into account the risk of damage to their reputation.

Before doing business with green4T Companies, all Third Party Intermediaries must undergo a review to verify their background, structure, relationship with Government Officials, reputation, and qualifications to perform the work for which they would be hired. The review process may be done independently, or in conjunction with the Third Intermediate that must cooperate and provide all the information that green4T Companies deems necessary.

The Third Party Intermediary must certify that it will be subject to the Brazilian Anti-Corruption Law 12.846/13, the Foreign Corrupt Practices Law of the United States of America and all the country's anti-corruption laws in the market in which it operates.

Any existing contracts and renewals must be justified in advance. Contracts with Third Party Intermediaries must contain a description of the services, amounts to be charged, and, among others, must contain clauses to ensure compliance with anti-corruption laws, aiming to mitigate the risk of illicit payments and provide the company with the means to terminate the relationship if there are violations.

4.10. MERGERS, ACQUISITIONS AND CORPORATE RESTRUCTURING

green4T Companies will adopt measures to verify whether the company with which it is involved as a result of mergers, acquisitions or corporate restructuring processes has been or is involved in acts harmful to the public administration, and whether it has vulnerabilities that entail risks to its integrity.

4.11. ACCOUNTING CONTROLS

It is the responsibility of all Managers and Employees to ensure accurate and complete records of all expenses, transactions and payments of green4T Companies.

It is strictly forbidden to make false or inaccurate records, which conceal the correct nature or value of any transaction. No unofficial or unregistered funds or

Number: PL.00.13	MANAGEMENT SYSTEM POLICY	
Revision: 02	Anti-Corruption Policy	
Date: 06/02/2025		
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accounts may be created or maintained for no purpose, and no false, misleading or inaccurate entries may be made in the books and records of green4T Companies.

4.12. PENALTIES

It is the responsibility of all employees to report any violation and suspected violation of the requirements of local anti-corruption laws, in particular Brazilian and U.S. laws, as expressed in this policy.

Reports of violations, identified or anonymous, must be directed to the Compliance area of green4T Companies, through the e-mail canaldaetica@green4t.com, or by calling +55 (11) 99931-0915 or through the reporting channels contained in green4T's websites.

Measures will be taken to protect the confidentiality and anonymity of any report. The green4T Companies will not permit or tolerate any type of retaliation against anyone who files a good faith report or complaint of violation of this policy.

Any Employee who engages in retaliation is subject to disciplinary acts by the Company, including termination of employment.

Violations of this policy may result in severe civil and criminal penalties for green4T Companies and for the Employees and/or representatives involved. Individuals and their executives are subject to criminal penalties, as well as fines, in case of violation of Law 12.846/13 or the FCPA, which cannot be paid by the company.

In addition to the penalties that are imposed by law, violations of the anti-corruption policy may be punished with the following disciplinary measures, depending on the type and severity of the conduct: Formal warning; Good Practices Training (Compliance); Loss or cut of variable remuneration; Transfer to another function; Suspension; Termination with or without notice.

5. REFERENCE DOCUMENTS

F.00.07 – Authorization on the Offering of Hospitality, Meals and Entretenimento_green4T

6. RECORDS CONTROL

N/A.

7. REVISION HISTORY

Revision	Date	Description of the change	Manager Approved	Approved by Senior Management
00	03/12/2020	Politics was separated. New sequential numbering.	Vaner Silva	Vaner Silva
01	01/02/2024	Change in the number of federal decree in item 1. GOAL.	Eduardo Rasi	Thais Almeida
02	06/02/2025	Changed contact number in item 4.12.	Priscilla Bragança	Eduardo Marini