



# **ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**

**ESTRE AMBIENTAL INC.**



## GLOSSARY

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## 1. DESCRIPTION

### 1.1. OBJECTIVE

Estre Ambiental Inc., acting in the field of Collection and Treatment of Industrial and Commercial Waste in General, Urban Waste, Hospital Waste and Urban Cleaning, Transshipment, Preparation and Execution of Projects and Environmental Licensing, have established the following commitments:

- The prohibition of bribery (pay or receive) Corruption and Fraud;
- Strict commitment to Estre Ambiental Code of Ethics and Conduct.
- Strict commitment to Estre Ambiental Anti-Corruption and Anti-Bribery Policy;
- Strict commitment to all the policies, procedures and other applicable documents;
- Strict commitment to the Brazilian Anti-Corruption Law – Law number 12.846/2013 and compliance rules; and
- The continuous improvement of its activities and Anti-Corruption and Anti-Bribery of the Compliance Management System.

### 1.2. GENERAL ASPECTS

The Anti-Corruption and Anti-Bribery Policy aims to present the main directives and legal guidelines related to Estre Ambiental in line with the other initiatives from the Company, such as: disseminating the Code of Ethics and Conduct and the Estre whistleblowing channel (Alô,Integre!) and the active participation of the Ethics Committee. These initiatives provide the employees with the knowledge to identify risk situations related to the Brazilian Anti-Corruption Law.

The Anti-Corruption and Anti-Bribery Policy will be permanently disclosed to the employees, who must formally assume the commitment to comply with this Policy.

All the employees must observe the standards of integrity that were set forth in this Policy and stay away from interests and relations that are potentially harmful or contrary to the Company's Ethical principles.

The employees or Third Party who become aware of any violation of the Brazilian Anti-Corruption Law and the guidelines of this Policy, or also report any request for payment or undue advantage by a public or private agent, must immediately report it through the following means of communication or in the “Alô, Integre!” available below:

- **Website:** <https://www.alointegre.com.br>
- **Phone:** [0800 721 5964](tel:08007215964)

We affirm that any good-faith reporting of actual or potential violations will never result in retaliation against the reporting employee or anyone who refuses to participate in bribery or corruption — even if it causes the company a loss —, except in cases where the employee was involved in the violation.

In case of questions about this Policy can also be clarified by the email: [integre@estre.com.br](mailto:integre@estre.com.br), before any actions have been taken.

### 1.3. AUTHORITY

The Integrity and Compliance Area, which has an independent member on the Ethics Committee, has responsibilities, independence and authority to carry out its duties.

#### **1.4. ANTI-CORRUPTION GUIDELINES IN THE PUBLIC SECTOR**

1.4.1. The prohibition of corruption, Fraud and bribery includes;

I - Promise, offer or give directly and indirectly, undue advantage payment or non-official payment to a Public Agent or Third Parties related to him;

II - Finance, fund or sponsor or in any way subsidize the practice of Fraud, Bribery and Corruption;

III - Using as intermediary individual or legal entity to hide or disguise their real interests or the identify of the beneficiaries of the acts;

IV - Regard to bids and contracts:

a) Frustrating or defrauding the competitive nature of bidding procedures with the Public Administration;

b) Impede, disturb or defraud the realization of any act of public bidding procedures;

c) Driving a way or seeking to drive away a bidder by means of fraud or offering an advantage of any kind;

d) Defraud public bidding procedures or contracts related to the public bidding;

e) Create in a fraudulently or irregularly way a legal entity to participate in public bidding or celebrate an administrative contract;

f) Obtain improper benefit from modifications or extensions of contracts entered into with the public administration without authorization in law in the act in the bidding; or

g) Manipulate or defraud the economic and financial balance of contracts entered into with the public administration.

V - Hinder the investigation or inspection activities of public agencies, entities or public agents, or intervene in their performance including within the scope of regulatory agencies and the national financial system inspection bodies.

1.4.2. Este and Third Parties acting on his behalf shall cooperate in case of investigations or inspections realized by Public Agencies/Agents or Entities.

1.4.3. In case of mergers, acquisitions or other corporate transactions, Este will audit the counterparty before the conclusion of the transaction to verify the history of the practice of harmful acts provided in the Brazilian Anti-Corruption Law or other illicit related to Bribery, Corruption and Fraud.

## **2. PENALTIES**

All the Este employees are responsible for fully complying with this Policy and the non-observance of the precepts described will be considered a violation, may lead to application of disciplinary measures, such as: verbal or written warning or even dismissal which will be applied according to the nature and seriousness of the offense committed.

### 3. CONTROL INFORMATION

**Policy Name:** Anti-Corruption and Anti-Bribery Policy

**Polycymakers:**

<b>Assignments</b>	<b>Name</b>	<b>Área</b>
<b>Approver</b>	Gesner Oliveira	Independent member
<b>Approver</b>	Elaine Vallerini	Human Resources Manager
<b>Approver</b>	Vinicius Paes	Operations Superintendent
<b>Approver</b>	Hamilton Agle	CEO
<b>Approver</b>	Tatiana Pataro	Legal Superintendent
<b>Reviewer</b>	Klebson Almeida	Senior in Risks and Compliance

**Review/Approval Dates:**

**Review History:**

Review 1.0 - 03/16/2017

Review 2.0 - 08/27/2018

Review 3.0 - 08/26/2019

Review 4.0 - 11/26/2020

Review 5.0 - 03/14/2022

Review 6.0 - 03/20/2023

Review 7.0 - 01/16/2024

Review 8.0 - 03/22/2024

Review 9.0 - 02/20/2025



## ATTACHMENT I - GLOSSARY AND DEFINITIONS

**CORRUPTION** – Act to promote, offer or give undue advantage to third-party with the purpose of obtaining benefits in relation to others in an illegal and illicit manner.

**BRIBERY** – The offer, promise, donation, acceptance or solicitation of an unduly advantage of any amount (financial or otherwise), directly or indirectly, and regardless of location, as an incentive or reward for a person who is acting or not acting in relation to the performance of its obligations.

**BRAZILIAN ANTI-CORRUPTION LAW** - Law number 12.846/2013, endorsed in August 2013 which provides for the objective administrative and civil liability of legal entities for the practice of corruption against the public administration and its regulatory decree.

**AIÔ, INTEGRÉ** – Tool to the internal and external public to receive the complaints.

**ANTI-CORRUPTION AND ANTI-BRIBERY COMPLIANCE MANAGEMENT SYSTEM** – Set of interrelated or interactive elements of an organization to establish policies, controls and processes to achieve the objects of preventing bribery and corruption practices.

**THIRD PARTIES** - Suppliers, business partners or anyone acting on behalf of Estre.