



INTEGRITY FORM



GS Inima Brasil

A black and white photograph of a person wearing a hard hat with the 'GS Inima Brasil' logo and a safety vest, walking on a metal grate bridge over a body of water. The background shows trees and a clear sky. A large blue circle is in the top right corner, and white decorative lines are in the bottom left corner.

INTEGRIDADE

ÉTICA

TRANSPARÊNCIA

RESPEITO

COMPROMISSO

A MESSAGE FROM THE PRESIDENT



A GS INMA BRASIL, in line with its mission, vision and values, has developed the Integrity Program which aims to provide the Group, its Employees and Related Third Parties with , an important tool to ensure that all our actions are guided by ethics and integrity.

This Program, developed in accordance with our peculiarities, complies with the best practices of domestic control entities and is aligned with the integrity measures adopted by our parent company.

As part of the Program, GS INMA BRASIL makes available to Employees and Related Third Parties, the Integrity Guide, aiming at the practical application, training, qualification, strengthening of integrity and organizational culture.

In this way, we will build more and more respectful, humane and healthy relationships, ensuring a work environment where everyone feels good. Remembering that the responsibility to do the right thing belongs to all of us!

I look forward to your

support! Faithfully

yours

Paulo Roberto de Oliveira
CEO



THE CONCEPT

We are recognized in our sector for pioneering and innovation. We have integrity as one of the essential values for this construction and this recognition.

The concept was created based on our identity. Fingerprints refer to authenticity and have the characteristic of being immutable, that is, they cannot undergo changes or be altered. Therefore, we reinforce that our **integrity** is immutable.

We understand our Integrity Program will be updated throughout our journey, reflecting our respect for commitments.

ETHICS IS NON-NEGOTIABLE



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1. WHOM IS THE INTEGRITY GUIDE FOR?

The Integrity Guide is part of the GS INMA BRASIL Integrity Program and establishes standards and procedures for ethical guidance of all Employees and Related Third Parties in the development of all activities related to the business.

Everyone's commitment to the Guide is essential to achieve increasingly high ethical standards in the exercise of our activities.

It is important that everyone understands the Guide does not covers all possible situations and examples of ethical conduct or its violation, even because it is difficult to predict all of them. In these cases, in accordance with the ethical principles described herein, make use of your morals and common sense to know how to act in moments not exemplified, adapting your behavior and performance to that established in this Guide, always seeking to assess the risks and consequences of your acts.

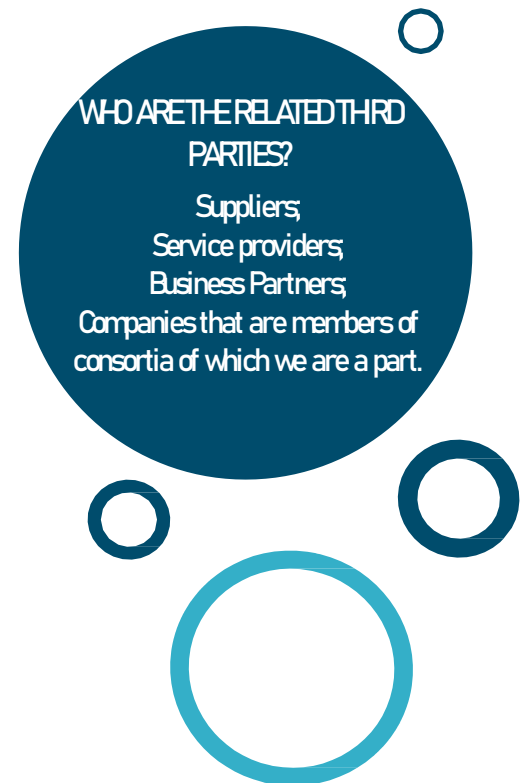
So, in these cases, do a reflection exercise beforehand:

- Is the conduct compatible with the Company's principles and values?
- Can I calmly explain that I acted in the right way?
- Does my conduct set an example for my co-workers?
- Am I acting without any violation to the provisions in the Integrity Guide, Integrity Code, current legislation or current internal regulations?
- Have I thought about and evaluated all available information for decision making?
- Have I assessed the risks and come to the conclusion the decision to be made is the best one for the Company?

If you respond affirmatively to the above questions, there is a strong indication that your attitude is in compliance and is contributing to the strengthening of GS INMA BRASIL's integrity environment.

Responding negatively to one of these questions, you should consult your superior to answer your questions, and should also consult the Compliance Area of GS INMA BRASIL.

GS INMA BRASIL, guided by this Integrity Guide, applies due control to promote compliance and prevent, detect and respond to irregular or contrary conduct, whatever its nature.



MISSION

Work on building a sustainable global future, taking care of the integral water cycle through the rendering of sanitation services with excellence, commitment and innovation, generating economic, environmental and social value for Customers, Shareholders, Employees and Brazilian Society.

VISION

To be recognized as a company of excellence and reference in the operational management of the sanitation industry in Brazil and as the best partner to ensure compliance with legal and social agreements, among the four largest private companies in the industry through sustainable growth.

VALUES

- Pioneering and Innovation
- Excellence in rendering services
- Sustainability and Social Responsibility
- Value Generation for the customer
- Care, Appreciation of People and Safety
- Integrity and respect for commitments

3. INTEGRITY IN THE ESG AGENDA AND ITS CONTRIBUTION TO THE ODS

Essential to the ethical conduct of business and to make the company more resilient, the GS Inima Brasil Integrity Program is an important component of corporate governance, one of the ESG pillars - an acronym that means environmental, social and governance, and corresponds to the environmental, social and governance practices of an organization.

Through the Integrity Program, GS Inima Brasil exercises its integral and responsible business model and contributes to the advancement of the Sustainable Development Goals (SDGs), established by the United Nations (UN) in 2015, which composed a global agenda to guide actions and public policies that aim to guide humanity until 2030.

Throughout the Integrity Guide, measures and practices could be identified that contribute to the Sustainable Development Goals.



4. WORK ENVIRONMENT



GS INMA BRASIL ensures a work environment where diversity and inclusion are premises and differences between people are respected.

The Company is committed to avoiding any form of discrimination against any person for any reason in the work environment. This commitment also extends to our customers, communities and all Related Third Parties.

No employee, candidate in a selection process, customer or related third party will receive discriminatory treatment or any form of harassment, intimidation or any other inappropriate conduct as a result of their personality, race, ethnic origin, nationality, social position, age, religion, gender identity, sexual orientation, personal aesthetics, physical condition, opinion, political conviction or any other factor of individual identity.

Moral and sexual harassment are inadmissible practices in the corporate environment of GS INMA BRASIL and will not be tolerated under any circumstances.

Harassment covers a wide range of behaviors, from direct sexual approaches (sexual harassment), to insults, mockery, imposition of impossible goals in the workplace, intentional isolation of the employee, vexatious nicknames that cause humiliation (moral harassment), resulting or may result in a hostile work environment, or any behaviors, even if veiled and subtle, that affect the morale, dignity and self-esteem of the worker, only in order to make him resign.

WHAT IS DISCRIMINATION?

Discrimination is defined as the act and result of treating people unequally by imposing unequal burdens or denying them benefits, rather than treating each person fairly on the basis of individual merit.

Discrimination may also include harassment. This is defined as a series of unwanted comments or actions, or should be reasonably known to be undesirable to the person to whom they are directed.



All Employees and Related Third Parties shall avoid improper behavior, also, if they identify them to report them immediately, using the Integrity Channel available at the link: <https://gsinmabrasil.clickcompliance.com/reporting-channel>.



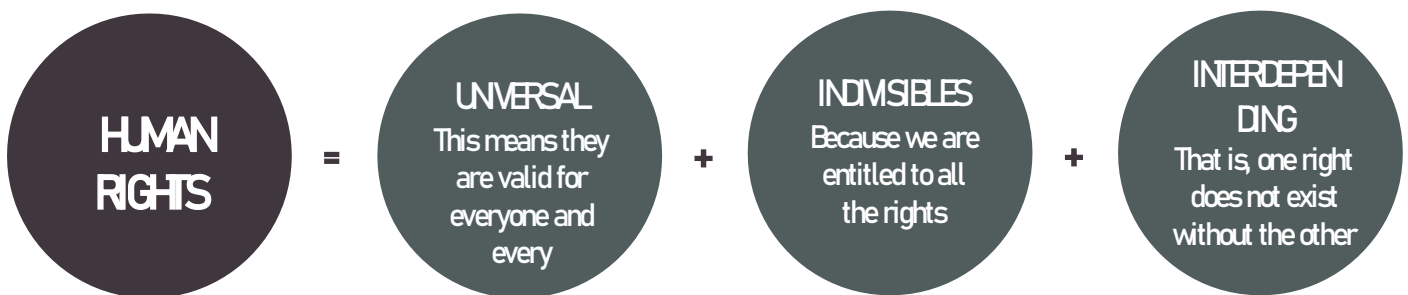
5. HUMAN RIGHTS



Have you ever thought about what all people have in common?

Men and women, children and the elderly, homosexuals and heterosexuals, Indians and blacks, Orientals and whites, pedestrians and cyclists, workers and business owners. Yes, we have many differences, but we also all have something in common, we are all human beings. Although different, we are all free and equal, regardless of sex, color, race, religion, sexual orientation and political opinion.

Therefore, we must be respected and protected, after all we all have rights. Our rights have been won with many struggles that have spanned generations, many men and women have contributed to the achievements and rights we have today. And today they are recorded and registered in the Universal Declaration of Human Rights.



WE HAVE RIGHT TO LIFE, LIBERTY AND SECURITY

WE HAVE THE RIGHT NOT TO BE ARRESTED WITHOUT CAUSE AND TO HAVE A FAIR TRIAL

WE HAVE THE RIGHT TO EDUCATION, HEALTH AND DECENT WORK

WE HAVE THE RIGHT TO CHOOSE WHICH RELIGION TO FOLLOW

Our rights may seem like just words in a document, but they are much more than that. They make it possible for you to exercise your power of choice, expression and decision.

Our rights must be respected. There are those who try to take away the rights of others through violence, oppression, embarrassment and humiliation. And the rights violated in the present, compromise the future of a country and its citizens.

So, stay aware! Report, request, and of course, always respect the rights of others. Ensuring human rights are effective and respected is the responsibility of all of us.

6. PROFESSIONAL DEVELOPMENT AND TRAINING



Everyone at GS INMA BRASIL has equal job opportunities

The Company encourages the training of employees, promoting specific training whenever necessary, to contribute to the learning and updating of the knowledge and skills of its employees, in order to facilitate their professional progress.

All units of the Group, through their Annual Training Plan (PAT), train and develop their professionals in all categories, such as technical, administrative, operational and executive, thus fostering Knowledge Management within the business.

7. HEALTH, SAFETY AND ENVIRONMENT



Individual rights are legitimate and must be respected. GS INMA BRASIL provides its Employees with an adequate work environment, aiming at safety, hygiene, health and well-being.

Everyone is instructed to fully comply with all legal requirements relating to safety, health and protection of the environment.

The production, use, possession, purchase, sale or trafficking of narcotics at GS INMA BRASIL's facilities is not allowed. Likewise, Employees shall not be under the influence of alcohol or drugs while performing their professional activities.



The employee and related third parties must report to their superior or through the Integrity Channel, the occurrences of dangerous or illegal behavior, possession or use of any type of weapon, unless expressly authorized by law/regulation and by the Company. To access the Integrity Channel, access the link below:
<https://gsinmabrasil.clickcompliance.com/reporting-channel>



ABRA A CÂMERA
DO SEU CELULAR
E APONTE PARA O
QR-CODE.



8. ASSETS PROTECTION

All assets that constitute the assets of GS INMA BRASIL and are entrusted for work reasons are the responsibility of the Employee, who must value their good condition, avoiding damage, loss or theft.

Assets, such as vehicles, tools, computers, mobile phones, systems, including means of communication, such as electronic mail (e-mail), teams, intranet (GS Integra), messaging applications and others, are work tools provided by GS INMA BRASIL and owned by it.

Therefore, they should be used exclusively for matters pertinent to the work.



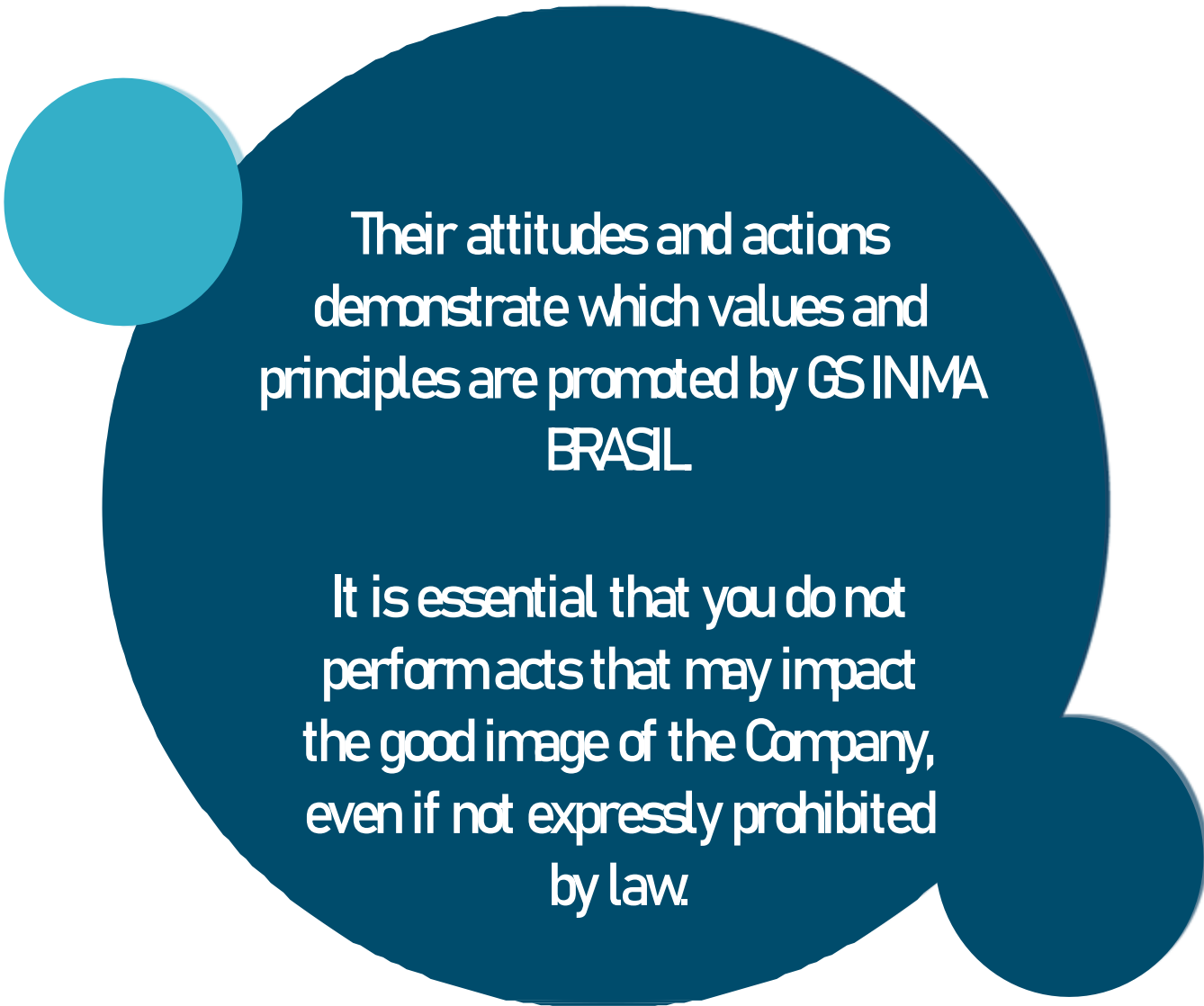
9. INTERNET AND SOCIAL NETWORKS USE

The use of the internet for personal purposes is allowed, as long as it is occasional and limited. This means its use cannot affect the Employee's productivity.

Transmitting or accessing inappropriate content or prohibited by law, such as games, pornography, discrimination, terrorism, party political propaganda, sale of products or services unrelated to the business is not allowed, during the workday and/or through equipment provided by the Company, .

The conduct of Employees and Related Third Parties violating the Company's values and reputation or the practice of intentional crimes, even if they are not in office hours and the violation has not been committed in the workplace, or even if the act occurs within the scope of the Internet or social networks, characterizes a breach of professional decorum and should imply the application of disciplinary sanctions, including the termination of the employment contract, if Employee, or contractual sanctions, if Related Third Parties, according to current legislation.

GS INMA BRASIL encourages the use of social networks with responsibility, respect, transparency and moderation. It is very important that Employees, when expressing themselves on social networks, are careful not to violate confidential data of the Company, the privacy of our customers and intellectual property.



Their attitudes and actions
demonstrate which values and
principles are promoted by GS INMA
BRASIL

It is essential that you do not
perform acts that may impact
the good image of the Company,
even if not expressly prohibited
by law.

Do not issue comments on unverified information, do not spread opinions or information about the personal lives of co-workers, do not disclose to third parties' opinions of appreciation or dislike about employees, especially if they are subordinates, as well as ensure good coexistence and the non-dissemination of fake news and content that may trigger conflicts and enmities between employees or related third parties.

GS INMA BRASIL, supported by the highest standards of integrity, expresses respect for competition and loyalty in relations with the market, therefore it will not allow offensive information to be disclosed to competitors. Publications with false, discriminatory and offensive content will also not be allowed, especially when they negatively expose the image of GS INMA BRASIL.



If there is any doubt about the content to be published on social networks, consult the Communication Area or the Compliance Area.

10. PRIVACY AND DATA PROTECTION

GS INMA BRASIL ensures the right to privacy of the personal data of its Employees and the target groups of interest, as well as the confidentiality of the personal data to which it has access, giving wide accessibility to its respective subject and using them only for justified, appropriate and legally permitted purposes.

ALL EMPLOYEES AND RELATED THRD PARTIES' DUTIES ARE

1

To have the exact understanding that the processing of personal data is allowed only for specific, defined and legitimate purposes;

2

To observe and comply with privacy and personal data protection standards and guidelines;

3

To check which personal data are really necessary for the development of its activity before collecting, accessing, using, storing, disclosing or carrying out any other type of processing;

4

Not to share access passwords or use passwords of others to access corporate systems or computers;

5

In the use of the Company's equipment and resources, there should be no expectation of privacy, and GS INMA BRASIL should have access to the content produced or transited by them in compliance situations.

11. INFORMATION SECURITY

The information is an asset of GS INMA BRASIL, therefore, to ensure the appropriate levels of confidentiality, integrity and availability, we rely on the Normative Structure of Information Security (ENSI), available at GS Integra.

ENSI is the documents set – such as guidelines, policies, operational procedures and technical instructions – that establishes the rules and responsibilities related to Information Security.

- All Employees and Related Third Parties are subject to compliance with these standards and accept them as part of their professional responsibilities;
- The information should only be used to support professional activities, which should be handled responsibly so that levels of confidentiality are maintained;
- Access to information should always be restricted following the Principles of Least Privilege. It provides that only the least access necessary for the performance of their professional duties should be given;
- The sharing of information should only take place with Employees and Related Third Parties who may have access to or who need this information to perform their professional activities, by means of express authorization;

The need to maintain physical or digital documents containing confidential information and/or eligible Personal Data shall be assessed and, if applicable, ensure they are destroyed and/or disposed of in accordance with the General Data Protection Law – LGPD;

The hierarchical superior or Information Security Area must be communicated on any and all incidents related to information security identified inside or outside GS INMA BRASIL, so that the necessary measures can be taken.



If in doubt, consult the Normative Framework for Information Security (ENSI), available at GS Integra, or your superior, who can assist you with these issues.

12. INTERACTION WITH THE COMMUNICATION MEDIA

Only authorized persons shall make statements or provide information to the communication media, regardless of the subject. Any requests for information regarding GS INMA BRASIL must be forwarded to the Corporate Communication Area, which will be responsible for presenting the Company's position.

No Employee or Related Third Party is authorized to engage in any public relations activity on behalf of GS INMA BRASIL. Whenever necessary, we will provide information to the media promptly, but this contact must always be at the level of Presidency, Executive Board or delegated third party.

All media inquiries must be forwarded to the Corporate Communication Area of GS INMA BRASIL by e-mail comunicacao@gsinima.com.br or in specific cases where any subsidiary directly has a communication department.

13. CONFLICT OF INTERESTS

Employees and Related Third Parties are expected to act in accordance with the highest standards of personal and professional integrity, in addition to full adherence to this Guide, the Integrity Code, Laws, Policies and Internal Standards.

No engagement in any activity in conflict of interest with GS INMA BRASIL's business.

CONFLICT OF INTEREST MAY OCCUR WHEN

- I. The personal interests of the Employee or Related Third Party conflict or should conflict with the interests of the Company, and with the performance of its activities in an exempt manner to serve the interests of GS INMA BRASIL;
- II. The particular activities of the Employee or Related Third Party are incompatible with their obligations to GS INMA BRASIL, among other situations.

The kinship relationship, whether by blood or affinity, in a straight and collateral line up to the third degree and the affective relationship between Employees can occur, provided that there is no direct hierarchical subordination, influence of management decision and processes.

Every situation involving Conflict of Interest must be recorded, in order to maintain internal control in the Company and for audit purposes. In this regard, all those who are subject to this Guide must fill out the Conflict of Interest Form available on the Compliance Platform or in the Conflict of Interest Policy Annex I and send it to the email integridade@gsinima.com.br, for monitoring by the Compliance Area. The Employee must inform his/her superior about the conflicting situation.

There is nothing wrong with being confronted with a conflict of interest - we each have a social life. What matters is to be aware of the existence of actual, potential or perceived conflicts of interest, and appropriately declare any such conflict and, if you are a team manager, clarify it in accordance with our policy and ethical principles.

The Responsible for the Compliance Area is liable for monitoring, coordinating and evaluating the treatment of evidence of transgressions to conducts of conflict of interest, together with the hierarchical superior and the GEP (Strategic People Management) area dealing with the subject matter.

All employees must annually complete the Conflict of Interest Form made available by GS INMA BRASIL to confirm adherence to the Company's Guide, the Code, policies and standards.



For more details, see the Conflict of Interest Policy, Related Third Party Policy and the Anti-Corruption Policy.

14. ACCOUNTING RECORDS AND FINANCIAL STATEMENTS

GS INMA BRASIL adopts strict accounting standards, always in line with best practices and accounting principles, and in compliance with applicable laws.

The Company's financial statements, books and records must faithfully reflect its administrative-financial situation, accurately, clearly and objectively representing all GS INMA BRASIL's business and operations.

THE EMPLOYEES AND RELATED THIRD PARTIES SHALL BE ALERT AND REPORT ACTIONS INVOLVING

(a) Fraud or willful errors in the preparation, maintenance, assessment, review or audit, whether external or internal, of any financial statement or financial record;

(b) Failures or no-compliance in internal accounting controls;

(c) misrepresentation or misstatement in any public disclosure documents, such as annual or quarterly reports, leaflets, circular letters and press releases; or

(d) Failures or deviations in the reporting of accounting and financial information in a complete, true and objective manner.

Based on the principles governing this INTEGRITY GUIDE, all Employees and Related Third Parties must provide secure and accurate information about the records and documents involving GS INMA BRASIL's business activities, at the right time, in addition to the proper conservation of data and the review of this documentation with the relevant legal and/or tax procedures.

Records must be correct, complete and comply with legal requests and requirements.

All books, records, accounts and financial statements must accurately reflect the transactions made.

15. GIFTS, PRESENTS AND HOSPITALITY

GS INMABRASIL's relations with Related Third Parties, and/or Public Agents shall always be guided by ethics, integrity, legality, morality and transparency, seeking to ensure the construction of sustainable, honest and lasting relationships, avoiding the existence of a conflict of interest or the possibility of undue advantage.

No gift, present, or hospitality can be given in any event to any person, whether Public Official or not, to influence or compensate unduly an act or decision as actual or intended compensation to obtain any benefit or advantage to GS INMA BRASIL, its Employees or Related Third Parties.

Any receipt or offer of Gifts, Presents and Hospitality shall be made in accordance with the laws applicable to the act and/or the place where they are made.



When in doubt,
consult the Gifts,
Presents and
Hospitality or
Compliance area.

16. DONATIONS, CONTRIBUTION AND SPONSORSHIPS

DONATIONS

Any contribution (financial or otherwise), which aims to highlight the social responsibility of GS INMA BRASIL through specific actions contributing to meeting the specific needs of society without the expectation or acceptance of a competitive advantage in return. This is an act of mere liberality. For instance: social actions, charity, philanthropy, of a cultural nature, among others.

SPONSORSHIP

Investments in sponsorships aim to improve the relationship of GS INMA BRASIL with its stakeholders, add value to the brand, contribute to the company's reputation and/or contribute to the development of the communities in which the Company operates, always in line with the Social Responsibility and Sponsorship Policy.

Making donations to political agents or political parties is strictly forbidden, whether or not directed to campaigns for the election of positions in the Executive and Legislative branches.

The decision to make donations, contributions or sponsorships shall always be preceded by the prior verification (Due Diligence) of the potential beneficiaries, carried out by the Compliance Area.



When in doubt, consult GS INMA BRASIL's Social Responsibility and Sponsorship Policy or Compliance Area.

17. ANTI CORRUPTION LAW



In order to comply with Law No. 12,846/13, all Employees and Related Third Parties shall manage business with integrity, avoiding any form of fraud, bribery or corruption against the Government.

GS INMA BRASIL requires its Employees and Related Third Parties to act in accordance with current laws, the Integrity Code, the guidelines of this Guide and the guidelines of its Anti-Corruption Policy.

WHAT IS CORRUPTION?

Corruption is considered to include practices such as bribery, kickback payments, fraud, extortion, collusion and money laundering; the offering or receiving of gifts, loans, commissions, rewards or other advantages as an inducement to do something dishonest, illegal or that represents a breach of trust.

It should also include practices such as misappropriation, influence peddling, abuse of office, illicit enrichment, concealment and obstruction of justice.



18. MONEY LAUNDERING PREVENTION

It is known links between companies can end up serving shady purposes, mainly aimed at the illicit transfer of funds.

Like corruption, money laundering has come to deserve the attention of national and international authorities and its fight has become a necessity.

Thus, it is a daily obligation to prevent, combat and prohibit any activity related to money laundering. Any payment must have a defined, clear, proven and traceable origin

WHAT IS ANTICORRUPTION AND MONEY LAUNDERING?

According to legal definition (Law No. 9,613/98), the crime of money laundering is the act of "hiding or concealing the nature, origin, location, disposal, handling or ownership of goods, rights or amount directly or indirectly derived from a criminal offense".

In fact, it consists of a scheme to make it appear that resources obtained through illegal activities came from legal activities.

19. ANTITRUST LAW

Trust and monopoly practices are actions taken by an organization that should result in collusion aimed at creating barriers to entry into the sector or otherwise avoiding competition. These actions include unfair business practices, abuse of market position, formation of cartels, mergers leading to unfair competition, and price fixing.

Violations of the Antitrust Law shall subject GS INMA BRASIL and its Employees to criminal sanctions, including fines, imprisonment and civil liability.

The Legal Board can clarify all doubts regarding the antitrust laws applicable to GS INMA BRASIL.

20. LEGISLATION ON SLAVE LABOR AND CHILD LABOR



Fundamental Human Right is not being subject to forced or slave-like labor.

The abolition of child labor is also a fundamental principle and target of major human rights declarations and legislation and is provided for in domestic legislation in almost all countries.

Forced or slave-like labor is defined as “any work or service required of an individual under threat of any penalty and for which he has not volunteered”

Convention no. 29 of International Labor Organization (ILO)

CHILD LABOR

Child Labor is defined as work that deprives children of their childhood, their potential and their dignity, and is harmful to their physical and mental development, also interferes in their education. Specifically, it refers to types of work that are not allowed for children under the relevant minimum age.

GS INMA BRASIL repudiates and prohibits any form of use of forced or slave-like labor, child labor and the work of children under 16 years of age, except for the special hiring of the “minor apprentice”, in accordance with the applicable special legislation.

The business relationship of Related Third Parties who use slave labor or child labor in violation of the legislation in force is strictly prohibited.

21. RELATIONSHIP WITH THE GOVERNMENT

Employees and Related Third Parties should be in direct contact with Public Officials in the performance of their activities.

Giving, offering or promising, directly or through third parties, an undue advantage is expressly forbidden to any Public Official or person related to him/her with a degree of natural, blood and/or affinity kinship.

Public Official: any person who exercises or occupies positions, offices, mandates or any other positions related to the performance of Public Administration or political functions, including:

1. Employee who holds a public office, job or function, even temporarily or without compensation;
2. Domestic, state, municipal or local elected and appointed officials, including positions in the legislative, judicial and executive branches;
3. Employees of Government-owned Companies;
4. Government officials from environmental, licensing, tax and customs agencies, commissions or departments;
5. Members of the police force, including the military, local police and enforcement agencies;
6. Employees of public international charities institutions;
7. Employees of universities, school systems or hospitals administered by government.

Any interaction of Employees and Third Parties Related to the Government shall follow the highest level of integrity and transparency.

In this regard, the Senior Management of GS INMA BRASIL, including the Directors of its subsidiaries or to whom it is delegated to act on behalf of GS INMA BRASIL, who hold face-to-face or online meetings, must formalize such contact through a Contact Registration Form with Public Agents available on the Compliance Platform or in the Contracting Policy with the Public Administration Annex I and send it to the Responsible for the Compliance Area by e-mail: integridade@gsinima.com.br

In the case of face-to-face or online meetings, or any interaction with Public Agents, related to the routine of GS INMA BRASIL's business, therefore, in the ordinary course of business, referring to operational matters, the filling in the Form of Records of Contact with Public Agents is waived.

Also on the subject of the meetings, it is preferable they are held either at the headquarters of the agencies and entities of the Government or at the Company's headquarters or branch, and the employee, related third party or person acting on behalf of or for GS INMA BRASIL is accompanied by another employee, whenever economically and technically possible, in strategically relevant meetings.

In relation to political agents (mayors, councilors, governors, deputies, senators, president), contact must be restricted to the Senior Management of GS INMA BRASIL or the Officers of its subsidiaries. If any other employee is contacted by political agents, he/she must inform that the Company's rules determining this contact must be formally forwarded to the hierarchical superior.



For more details and rules on the relationship of Employees and Related Third Parties with Government, see the Contracting Policy with the Government, the Anti-Corruption Policy and the Conflict of Interest Policy.

22. BIDDINGS AND ADMINISTRATIVE AGREEMENTS



Whenever the Government needs goods or service, bidding process shall be carried out and the agreement entered into with the private sector is subject to a specific system which is very regulated.

GS INMA BRASIL, when participating in public bids, will respect all current terms and legislation, especially the Bidding Law (Law No. 8,666/1993 or Law No. 14,133/2021), the Anti-Corruption Law (Law No. 12,846/2013) and the Concessions Law (Law No. 8,987/1995).

In bidding, the unlawful conduct performed by the bidder usually refers to the attempt to defraud the bidding, that is, to obtain, by some unlawful means, an undue advantage in relation to competitors, or to harm the actual bidding, through unlawful agreements.

GS INMA BRASIL prohibits any type of unlawful conduct in bids:

- Agree prices with other bidders;

- Threaten other bidders;

- Influence the definition of the notice to avoid the participation of other competitors or to grant undue benefit to itself;

- Illicit market division or non-competition agreements, that is, when companies decide which ones will participate in each bidding process in the same area by agreeing not to participate in a particular bidding process for the benefit of another bidder.

GS INMA BRASIL approved its Anti-Corruption Policy to be known and complied with by all its Employees and Related Third Parties, in addition to complying with the other guidelines and rules of this Integrity Guide.

23. AGREEMENTS WITH RELATED THIRD PARTIES

Efficiency, economy and good reputation will be observed as premises.

Aware of its responsibility to drive the virtuous cycle of business integrity, the Company will encourage Related Third Parties or person acting on behalf of or for GS INMA BRASIL to adopt good integrity practices.

The Related Third Parties or person acting on behalf of or for GS INMA BRASIL must effectively adhere to the Company's guidelines, especially those indicated in the Related Third Parties Policy and in this Integrity Guide and must preserve transparency in commercial relations and quality in the services rendered.

GS INMA BRASIL sets high standards of excellence in service rendering and expects Related Third Parties to do so as well.

In this regard, GS INMA BRASIL will be allowed to permanently supervise the services provided by Related Third Parties or a person acting on behalf of or for GS INMA BRASIL, in order to ensure the desired quality and efficiency based on domestically or internationally recognized standards.

The permanent qualification of Related Third Parties will also be required through training of their employees and specific investments, whenever necessary.

The consortia negotiation and formation processes, as well as negotiation and conclusion of corporate operations, notably acquisition, merger or any other corporate operation shall observe, in relation to the potential asset, the procedures for prior verification - Due Diligence - provided for in the Related Third Party Policy, which shall always be consulted in case of doubts.

24. INFORMATION



GS INMA BRASIL encourages all Employees and Related Third Parties, as well as all other stakeholders, to record any situation indicating a violation or potential violation of the provisions set forth in this Guide, Integrity Code, rules, laws, policies and regulations or any other improper, wrong and/or illegal conduct.

Report the facts internally
is essential to the GS INMA
BRASIL's success and the
behavior expected and
valued.

Compliance:



GS Inima Brasil Integrity Channel



Email: integridade@gsinima.com.br



Website: integridade.gsinima.com.br



Telephone: (16) 3962-8158

25. INTEGRITY CHANNEL – HANDLING INFORMATION.

The Integrity Channel is a way to expand our commitment to transparency and ethics, and its purpose is to give a voice to complainants so that they feel comfortable reporting irregularities.

GS INMA BRASIL promotes an environment of protection against any form of retaliation or reprisal to those who, in good faith, report the practice of irregularities or cooperate with an investigation. Disciplinary action will be applied to any employee who attempts, or actually performs, retaliation against any complainant, whether another employee, related third party or person acting on behalf of or for GS INMA BRASIL. False allegations made in bad faith by an employee or related third party will imply disciplinary measures against those involved, if Employees, or contractual sanctions, if Related Third Parties, in accordance with current legislation.

The Integrity Analysis is confidential, independent and secret and is available to the Company's external and internal target groups, allowing anonymous or identified reports.

Important that the report of the complaint contains the information allowing the investigation. Thus, The irregularity shall be clearly described, specifying the irregularity, the area in which the fact occurred or occurs, who committed the incident, when (or since) it happened or has happened, as well as names of people who should eventually help clarify the facts. Vague, non-specific allegations or without sufficient information for the analysis are more difficult to ascertain, and should even make the evaluation impossible, thus is archived.

Personal data and sensitive data, such as health status, racial and ethnic origin, religious and political affiliation, as well as all other aspects of information eventually collected in the information, will be used solely for the handling and investigation of the reported facts, on a confidential basis.

The procedure for investigating information will be performed by the Responsible for the Compliance Area, who will be liable for carrying out the investigations necessary to prove the allegations.

To learn more about the verification procedure, see the Integrity Code.

26. BREACHES TO THE GUIDE

Any violations of this Guide by Employees will not be tolerated, and will be subject to applicable legal sanctions, and to sanctions provided for in the GS INMA BRASIL Integrity Code, such as disciplinary measures, including contractual termination. Any violations by Related Third Parties will result in the application of a fine or termination of a contractual relationship with the Company.

A DISCIPLINARY MEASURE WILL BE APPLIED TO THE MANAGER RESPONSIBLE FOR THE EMPLOYEE WHO HAS COMMITTED THE VIOLATIONS, IF THEIR CONSCIOUS OMISSION TO IMMEDIATELY REPORT THE CASE AND/ OR STOP THE DEVIATION IS FOUND.

27. G SINIMA BRASIL'S INTEGRITY COMMITTEE

The Integrity Committee of G SINIMA BRASIL is an internal body made up at least by 3 (three) effective members, to be the CEO, the representative of the Strategic People Management (GEP) Board and the person responsible for the Compliance Area, and when necessary, designated by mutual agreement between the other members, one technical representative (G SINIMA BRASIL employee or external person), chosen according to the nature of the violation performed, by way of cooperation, who will sign the Confidentiality and Secrecy Agreement.

The Committee will be liable for promoting the ratification or revision of the disciplinary measures recommended by person in charge for the Compliance Area.

The decisions of the Integrity Committee shall be taken unanimously by consensus.

28. RESPONSIBILITY AND TRAINING INSTRUMENT

All G SINIMA BRASIL's Employees and Related Third Parties must sign the Term of Knowledge, Adherence and Responsibility to this Integrity Guide, committing themselves to ensure the application of all the provisions described herein, according to the model attached to this Integrity Guide.

The Company will provide periodic training to all its Employees, and when deemed necessary to Related Third Parties, by physical or virtual means, regarding the main practices to be observed by all and the need to comply with the provisions of the Guide.

No Employee and Related Third Party should claim ignorance of the guidelines contained in this Guide, under any circumstances or under any argument.

This Guide enters into force on the date of its formalization, effective for an indefinite period from its approval, and will be updated whenever there is a revision of the G SINIMA BRASIL Integrity Program



**FAZER A SUA PARTE
EM UMA EMPRESA
É SER ÉTICO COM O
SEU COMPROMISSO.**

**A ÉTICA É A BASE DE
TODA E QUALQUER RELAÇÃO
HUMANA, POIS SOMENTE COM
ELA CONSTRUÍMOS LAÇOS
VERDADEIROS E RESPEITOSOS.**

29. ANNEX I

TERM OF KNOWLEDGE, ADHERENCE AND RESPONSIBILITY TO THE INTEGRITY GUIDE OF GS INMA BRASIL -

[employee]

By this Term of Knowledge, Adherence and Responsibility,
_____, hereinafter referred to simply as "Declarant", as an
Employee of the company that is _____ part of the GS INMA BRASIL
Group, declares its knowledge and accord with the content of the Company's Integrity Guide,
undertaking, in this act, to observe and fully comply with it, also subject to the appropriate
disciplinary measures.

_____, _____ of _____ of 20____.

[Declarant]

30. ANNEX II

TERM OF KNOWLEDGE, ADHERENCE AND RESPONSIBILITY TO THE INTEGRITY GUIDE OF GS INMA BRASIL - [related third party]

By this Term of Knowledge, Adhesion and Responsibility, attached to Agreement No.____ or equivalent instrument, entered into with the company part of the GS INMA BRASIL Group, the declarant _____, under CNPJ No. _____, hereinafter referred to simply as "Declarant", declares that:

a.is aware of and understands the provisions of Law No. 12,846/2013, as well as all applicable anti-corruption and anti-money laundering laws and regulations in Brazil;

b.is not currently under investigation or surveillance carried out by government agencies or authorities for an alleged act of administrative impropriety or for the practice of an act of corruption or that undermines the Public Administration;

c.became aware of and understood the content of GS INMA BRASIL's Guide, undertaking herein to observe and fully comply with it, in its capacity as contractor of GS INMA BRASIL, also subject to the applicable sanctions, specified in the Agreement, notwithstanding civil, administrative and criminal liability;

d. will keep secrecy of the confidential information obtained during the performance of the Agreement;

e.will not omit from GS INMA BRASIL any relevant information regarding the relationship between the Parties, in compliance with GS INMA BRASIL's Integrity Guide

f. shall immediately report to GS INMA BRASIL:

I. the filing of an investigation, query or inquiry for the alleged practice, by Declarant, of acts of impropriety of the Public Administration, which occurred during the term of the Agreement;

II. possible violations of the anti-corruption legislation and the GS INMA BRASIL Integrity Guide, involving Declarant and his representatives, as well as the representatives of the contracting company, a member of the GS INMA BRASIL Group.

_____, _____ of _____ of 20____.

[Declarant]

GRAPHIC DESIGN
Communication Department

DESIGN AND CONTENT
GS Inima Brasil Compliance

REVISION
GS Inima Brasil
Compliance Board

PERFORMANCE
GS Inima Brasil



INTEGRITY FORM



GS Inima Brasil



GS Inima Brasil

GS Inima Brasil Integrity Channel

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(16) 3962-8158

Our present is our future.



GS Inima Brasil
COMPLIANCE