
		ANTI-CORRUPTION POLICY	
		Management Area: Compliance	Document Type: Politics
Date: 03/23/2023	Revision N°: 00	Scope: Investigation	Document Code: GSB-COM-POL-001

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To Collaborators and Related Third Parties

GS INIMA BRASIL, in line with its mission, vision and values, has developed the **GS INIMA BRASIL** Integrity Program which aims to provide the Group, its Collaborators 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.


Within this effort, we present the GS Inima Brasil Anti-Corruption Policy, an extremely important document that brings together the main rules and procedures that must be adopted by our Collaborators and Related Third Parties acting on behalf of GS Inima Brasil, to avoid the practice of acts of corruption.

Paulo Roberto de Oliveira
CEO

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1. PURPOSE

The purpose of this Anti-Corruption Policy is to be part of the GS INIMA BRASIL Integrity Program and establish ethical guidelines for the guidance of collaborators and everyone who acts on behalf of or for GS INIMA BRASIL, as well as in all activities to be carried out.

2. SCOPE


The following are covered by this policy, subject to its provisions and others relating to the GS INIMA BRASIL Integrity Program:

- a) All companies of the GS INIMA BRASIL Group;
- b) All Collaborators of the GS INIMA BRASIL Group;
- c) Third Parties Related to the GS INIMA BRASIL Group and;
- d) Transactions between companies belonging to the GS INIMA BRASIL Group, including transactions with related parties.

3. REFERENCES

This Anti-Corruption Policy was prepared based on current legislation to combat corruption and maintain an ethical and honest environment, more specifically the following diplomas:

- Code of Integrity;
- Integrity Guide;
- POL - 002 - Social Responsibility and Sponsorship Policy;
- POL - 005 - Promotional Gifts. Gifts and Hospitality Policy;
- Penal Code (Decree-Law No. 2.848/1940): Lists crimes against the Public Administration and committed by public agents;
- Public Civil Action Law (Law No. 7.347/1985): Provides for specific legal action to hold responsible those who have caused damage to public property;
- Administrative Improbity Law (Law No. 8.429/1992 - with important changes brought by Law 14.230/2021): Holds public agents, individuals and companies responsible that have obtained illicit enrichment due to the position or function they occupy and companies that have participated in the illicit act;
- Bidding Law (Law No. 8.666/1993 or Law No. 14.133/2021): Defines crimes committed specifically in tenders and contracts signed by the Public Administration;
- Law on Crimes against the Tax, Economic and Consumer Relations Order (Law 8.137/1990): Specifies tax crimes (evasion);
- Competition Defense Law (Law No. 12.529/2011): Establishes conduct, including in bidding processes, that constitute an attack to the economic order;

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- Anti-Corruption Law (Law No. 12.846/2013 and Decree No. 11.129/2022): The Law defines acts harmful to the Public Administration, and the Decree regulates Law No. 12.846/2013;
- Criminal Organizations Law (Law No. 12.850/2013): Defines the meaning of criminal organization.

IMPORTANT: Under the Administrative Improbability Law, conducts can be punished for violating “principles of Public Administration”. In other words, there is a very open concept of an illicit act that can give rise to liability for GS Inima Brasil and its collaborators.

The principles of Public Administration are:


- ✓ Legality
- ✓ Impersonality
- ✓ Morality
- ✓ Advertisement
- ✓ Efficiency

4. DEFINITIONS

- **Corruption:** it is a wide concept. It encompasses several practices, both in the public and private spheres. In general terms, corruption is the practice of acts or conduct that violate a certain rule, always aimed at obtaining an undue advantage.

For the specific purposes of this Policy, corruption can be understood as the practice of acts, by private individuals or **Public Agents**, aimed at offering an **undue advantage**, by the individual to the Public Agent, in return for a benefit obtained by virtue of the exercise of the public position or function.

Remember: not every corrupt act receives this name under current legislation, which uses other terms to refer to acts that are combated by this Policy: “Administrative improbity”, “acts harmful to the Administration”, “damage to the treasury” are all terms used by current legislation.

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To better understand what can characterize corruption, in the broadest sense, which represents what we intend to combat, consider some **examples of undue benefits** that can be obtained through corruption:

- New business or maintenance of ongoing business;
- Undue influence on commercial decisions;
- Undue advantage over competitors in a bid;
- Obtaining a review or recomposition of the administrative contract outside the legal hypotheses and without there being grounds for doing so;
- Undue change to the economic-financial balance of the administrative contract;
- Rapid and favorable conclusion of administrative processes (licensing, authorizations, application of fines and sanctions, etc.).

In turn, the following may be considered undue advantages offered to Public Agents to obtain benefits:

- Payments in cash;
- Assumption of public agent debts;
- Payments for goods (property, jewelry, automobiles, etc.) or services (property renovation, works, consultancy, etc.) to Public Agents;
- Offering promotional gifts outside the legally permitted hypotheses;
- Hiring third parties appointed by Public Agents, outside the Company's hiring rules.


IMPORTANT: FACILITATION PAYMENTS

Advantages promised or given for Public Agents to carry out acts within their competence are considered illicit, even if the company has the right to the result of that act.

For example: it will be illegal to pay or promise an advantage to obtain a permit or license, even if GS Inima Brasil already has the right to these documents, having complied with all legal requirements.

IMPORTANT: The simple promise of an advantage constitutes prohibited conduct.

Never promise a Public Agent any undue advantage. Even if you never have the real intention of offering such advantage, just the fact of having promised it is already considered illegal.

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- **Public Administration:** These are all bodies, agencies, foundations, public companies, mixed capital companies, regulatory agencies and all entities that make up the Administration of the Country, States, Federal District and Municipalities.

IMPORTANT: State sanitation companies (SABESP, CAESB, EMBASA, COPASA, SANEPAR, etc.), even though they are private companies, are part of the Public Administration.

- **Public Agent:** The following are public agents:


- employees who hold a public position, job or function, even if temporarily or without remuneration;
- national, municipal or local elected and appointed officials, including positions in the legislative, judicial and executive branches;
- employees of government-owned companies;
- government officials from environmental, licensing, tax and customs agencies, commissions or departments;
- members of the police force, including the military, local police and enforcement agencies;
- employees of public international charities institutions;
- employees of universities, school systems or hospitals administered by a public administration body.

IMPORTANT: For the purposes of prohibitions of the Anti-Corruption Policy, consider as equivalent to public agents all natural persons (family members, such as spouses, partners and relatives in a direct or collateral line, by consanguinity or affinity, up to the 3rd degree) and individuals who, even without family ties, have close proximity to Public Agents (such as friends, godparents and godchildren) and legal entities (companies, foundations, philanthropic or charitable entities, etc.) related to them.

Any links between Collaborators or Related Third Parties and public agents, existing before the approval of the Integrity Program, must be evaluated by the Person Responsible for the Compliance Area, in order to mitigate any conflict of interests.

5. RESPONSIBILITIES

5.1 SENIOR MANAGEMENT COMMITMENT

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It is up to the Company's Senior Management to reaffirm and commit to the effective implementation, monitoring, improvement and review of the GS INIMA BRASIL Integrity Program, and, in general, to the dissemination of an integral corporate culture committed to ethics in personal and business relationships.

5.2 COMPLIANCE AREA

The Person Responsible for the Compliance Area must make physical and/or digital copies of this policy and all documents that make up the GS INIMA BRASIL Integrity Program available, upon request.

5.3 COLLABORATORS AND THIRD PARTIES

All Collaborators and Related Third Parties must respect and fully comply with the GS INIMA BRASIL Integrity Program, participating in training and internalizing ethics in personal and business relationships into their routines.


6. GUIDELINES / METHODOLOGIES

6.1 PROMOTIONAL GIFTS, GIFTS AND HOSPITALITY

The provision of promotional gifts and gifts to public agents is subject to specific restrictions and control, which are not as present in the practice of loyalty and courtesy with customers and related third parties.

To better understand how to deal with offering promotional gifts and gifts, consider these general assumptions and rules:

- Promotional gifts are items of low economic value and distributed in a generalized way, as a courtesy, advertising or usual publicity that does not exceed the value of BRL 350.00 (three hundred and fifty Brazilian Reais);
- Promotional gifts must be offered in a generalized way, that is, without being exclusively intended for a single public agent or small group of public agents.

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- Gifts are goods or services for personal use or consumption, which have commercial value and which do not fall within the definition of Promotional Gifts, which do not exceed the value of BRL 350.00 (three hundred and fifty Brazilian Reais);
- The offering, promise, and/or receipt of Gifts to/from Public Agents and their Close Relatives is expressly prohibited.


Offering and receiving hospitality includes services or expenses related to transportation, food, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, and there are specific rules for offering and receiving this type of courtesy, requiring registration and prior approval, regardless of the value, and compliance with the provisions of legislation. Hospitality of an exclusive tourism or leisure nature is considered a gift.

It is prudent to avoid offering hospitality to public agents, unless authorized by the body or entity to which the public agent belongs, being clear that the offer is intended exclusively for a legitimate interest in the business activity or for a corporate event supported by GS Inima Brazil (within the rules of the Social Responsibility and Sponsorship Policy).

The Collaborator must register in accordance with the reference parameters for due control by GS INIMA BRASIL, and the Collaborator who receives or offers it is responsible for completing the Form for Offering and Receiving Promotional Gifts, Gifts and Hospitality available on the Compliance Platform of GS INIMA BRASIL, or fill out the Form in Annex II of the Promotional Gifts, Gifts and Hospitality Policy and send it to the person responsible for the Compliance Area via email integridade@gsinima.com.br, to maintain control over all Promotional Gifts, Gifts and Hospitality.

Registration or pre-approval is not necessary for offering or receiving Promotional Gifts that meet the guidelines and rules regarding value and frequency set out in the Promotional Gifts, Gifts and Hospitality Policy.

“Any receipt or offering of Promotional Gifts. Gifts and Hospitality must be carried out in accordance with the Laws and Code of Ethics and Conduct applicable to the act and/or place where they are made”.

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The Person Responsible for the Compliance Area may be consulted in advance regarding any promotional gifts, gifts or hospitality provided by Collaborators, in order to avoid any situation that could constitute a real, potential or apparent conflict of interest.

If you have any questions, consult the Promotional Gifts, Gifts and Hospitality Policy.

6.2 POLITICAL DONATIONS

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.

If an Collaborator chooses to make donations or contributions of any kind, they must do so exclusively with their own resources, without any use of GS Inima Brasil resources.


6.3 DONATIONS AND SPONSORSHIP

Donations or sponsorships can be used in bad faith, as a way of camouflaging the offering of undue advantages to public agents. It is enough for a public agent to request, in exchange for undue compensation from the company, donations to charities indicated by them or sponsorship for an event or institution of their interest.

It is important to make it clear that GS Inima Brasil is not prohibited from making donations and sponsorships, even to the Public Administration or at events promoted by it, as long as the Social Responsibility and Sponsorship Policy is observed, which details the rules and procedures for choosing beneficiaries of donations and sponsorships made by the GS Inima Group.

6.4 INTERACTION WITH PUBLIC AGENTS

When carrying out their activities, Collaborators and Related Third Parties acting on behalf of GS Inima Brasil are in direct contact with Public Agents. Whether in the relationship with inspectors or contract managers, or in the interaction with environmental agencies to obtain a license, or in the relationship that always exists with mayors, governors, deputies and councilors, considering that sanitation services are of special public interest.

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Within this reality, it is even more important that Collaborators and Related Third Parties acting on behalf of GS Inima Brasil observe additional precautions in their day-to-day activities, in order to reduce the risks of direct contact with Public Agents.

Some simple measures can have a very positive effect on the protection of the Collaborator and the Company, preventing undue interaction for illicit purposes.


The best way to protect against requests for undue benefits, implicit or explicit, by Public Agents, is to formalize the contact made.

In this sense, the Senior Management of GS Inima Brasil, including the Directors and Managers or whoever is delegated to act on behalf of GS Inima Brasil, who hold face-to-face or online meetings, or any interaction with Public Agents, must formalize such contact through the Public Agent Contact Records Form on the Compliance Platform or complete the Annex I Form of the Public Administration Contracting Policy and send it to the Person Responsible for the Compliance Area via [e-mail integridade@gsinima.com.br](mailto: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 INIMA BRASIL 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 meetings, it is preferable that they take place either at the headquarters of the Administration bodies and entities or at the Company's headquarters or branch, and that the collaborator, related third party or person acting on behalf of or for GS INIMA is accompanied by another Collaborator, 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 Inima Brasil or the directors of its subsidiaries. If any other Collaborator is contacted by political agents, he/she must inform that

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the Company's rules determining this contact must be formally forwarded to the hierarchical superior.


The hiring of former Public Agents is permitted, as long as they have respected the possible quarantine period, that is, they have left their position or employment for at least six (06) months or according to the period established by the body where they worked, counted from the act of separation (dismissal, exoneration, removal, discharge or retirement), in which case, he/she undertakes, further and at any time, not to disclose or make use of privileged information obtained as a result of activities carried out in the Public Administration. This prohibition will come into force from the date of approval of this Policy.

6.5 HOW TO ACT ON A REQUEST FROM A PUBLIC AGENT

No one is free from the risk of being approached by a Public Agent with a specific request. Given this reality, it is important that Collaborators and Related Third Parties keep some premises in mind.

First of all, not every request is improper. In some cases, requests made by the Public Agent will not represent an offense. And, although it is necessary to verify the circumstances of each request made, a task that must be shared with the person responsible for the Compliance Area, it is possible to establish some parameters for reacting to the request made by the Public Agent:

- Do not agree to any request that is accompanied by a promise or offer of consideration by the Public Agent. The famous “tit for tat”, “an eye for an eye” and similar words must be avoided and firmly refused by the Collaborator and Related Third Party acting on behalf of GS Inima Brasil;
- Even if there is no direct counterpart, requests made by Public Agents with decision-making power or to influence decisions that could benefit GS Inima Brasil need to be analyzed with greater caution;
- Be wary of requests for payments due to the Administration to be made on behalf of third parties appointed by Public Agents. Remember: all payments made to the Administration (fees, taxes, etc.) follow a specific procedure and will never have an

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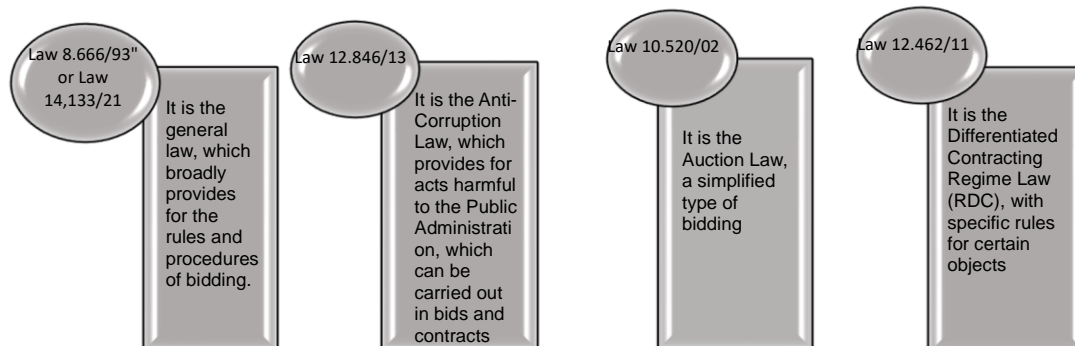
individual or company (except public companies or mixed capital companies) as beneficiaries;


- Job requests or hiring of third parties indicated by Public Agents may represent risk. It is necessary to make it clear to the requester that the Company has its own rules for hiring personnel and third parties and that the evaluation of the relevance of hiring the candidate will be carried out by the Corporate Strategic People Management area, without any advantageous conditions for the candidate;
- If the Public Agent imposes difficulties in carrying out acts of interest to GS Inima Brasil (obtaining licenses, signing contracts or addenda, considering recovery requests, etc.) or threatens to apply any type of sanction to the company, do not mention any attempt of resolution other than through legal means. Just inform that GS Inima Brasil will try to obtain the favorable act or defend itself from the application of a sanction in an administrative proceeding initiated for one of these purposes.

6.6 BIDS AND ADMINISTRATIVE CONTRACTS

Whenever the Public Administration 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.

The first step is to know the main laws that regulate bids and contracts concluded by the Public Administration:



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In bidding, the illicit conduct carried out by the bidder normally concerns the attempt to defraud the competition, that is, to obtain, by some illicit means, an undue advantage in relation to competitors, or, otherwise, to harm effective competition, through illicit agreements with other competitors or with public agents.

Examples of illegal conduct in bidding are:


- Agree prices with other bidders;
- Influence the definition of the notice to avoid the participation of other competitors or to grant undue benefit to itself;
- Threaten other bidders;
- Illegal market division or non-competition agreements, that is, when companies decide which ones will participate in each bid in the same sector, agreeing not to participate in a given bid for the benefit of another bidder;
- In contracts, in turn, the illicit conduct carried out by the bidder is more related to obtaining undue benefits as a result of the execution of the contract.

6.7 FORMATION OF CONSORTIA FOR BIDDING

The formation of consortia is a sensitive point in the participation of companies in bids and in the execution of public contracts, as the legislation determines joint and several liability between consortium members, that is, if a company acts in a non-conforming manner, all other consortium members are liable for the damages and losses caused by this improper action.

For this reason, it is important to be careful when forming consortia, which is why the following procedures are established for the formation of consortia with the participation of GS Inima Brasil:

- Declaration by consortium members regarding their commitment to complying with the provisions of current legislation, being concerned about conflicts of interest and expressly repudiating the practice of fraud and corruption;
- Mutual obligation to communicate in the event of committing fraudulent acts or corruption by another consortium member;
- Provision of specific liability for the consortium member that commits fraudulent or corrupt acts, including their exclusion from the consortium and the obligation to

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compensate for any losses and damages caused to the other consortium members due to their misconduct.

When executing administrative contracts, it is essential to respect the contractual conditions and, in the case of necessary changes, the requirements and procedures provided for by law for the conclusion of amendments.

Changes made to the contract must be formalized and based on technical and legal arguments.


It is important to keep in mind that manipulating the economic-financial balance of the contract is considered an act harmful to the Public Administration. For this reason, requests for contractual changes to compensate for any loss of GS Inima Brasil must be supported by studies and the truth of the facts.

All documents related to GS Inima Brasil participation in bids and contracts signed between the company and the Public Administration must be registered by the New Business Area, which will be responsible for keeping this documentation, in digital form (except when the printed copy is legally required), for an indefinite period of time, for consultation by the Compliance Officer or for internal audit purposes.

6.8 SUPERVISION AND REGULATORY POWERS

A relevant part of the Administration's activities concerns inspection activities and the exercise of regulatory powers. These activities include licensing processes, the granting of authorizations, permissions and certificates, in addition to the application of administrative sanctions.

The exercise of various business activities depends on the performance of these acts by the Public Administration, all of which are formal and implemented in the issuance of official documents, which (i) recognize or attribute a condition or right of the individual, or (ii) which allow the performance of a specific activity or action.


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Documents of this nature are authorizations, licenses, permissions or certificates, and their issuance will always depend on the fulfillment of certain conditions and requirements by the individual requesting it.

On the other hand, the issuance of such documents always depends on the action of a Public Agent, who is responsible for analyzing compliance with the required requirements. And it is at this point that the greatest risk arises related to the interaction of GS Inima Brasil with the Public Administration. As all of our Collaborators know, GS Inima Brasil is dedicated to basic sanitation service activities, including comprehensive water management, construction, O&M, industrial utility services and concessions. These activities are highly regulated, as they can impact the environment. For this reason, there will always be a need for actions from the Administration so that GS Inima Brasil can carry out its activities.

This situation creates greater fragility for GS Inima Brasil, which is subject to the illicit actions of public agents who may request undue advantages for the issuance of documents necessary for the company's operations; they may also threaten to apply additional sanctions and obligations as an instrument of pressure to obtain these advantages. It is essential that each Collaborator or Related Third Party, acting on behalf of GS Inima Brasil, involved in the procedures for obtaining official documents keep the following premises in mind:

- It is expressly prohibited to pay in cash, transfer goods and merchandise, offer benefits or any other form of undue advantages to the public agent responsible for issuing official documents;
- Even the simple promise or sign of offering an undue advantage is prohibited;
- To detract the illicit act from its character, it does not matter that GS Inima Brasil has met all the requirements and is entitled to the issuance of the document, since, even in cases where the undue advantage is required to fulfill the duty (in this case, the issuance of document upon proof of compliance with the requirements for this by the individual), the offering of this advantage constitutes corruption;
- Reject, promptly and expressly, without mincing words, any express request for undue advantage made by the public agent, expressly informing them that the payment of bribes and undue advantage is strictly prohibited by the GS INIMA BRASIL Integrity Program;
- In the above case, immediately inform the Compliance Officer about what happened.

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- If the public agent threatens not to issue the document, places undue obstacles to doing so, or threatens to apply a fine or other sanction to GS Inima Brasil, request them to formalize the denial or the application of a sanction in an administrative process, officially communicating to the Company about their decision; also ask them to explain in a formal process the reasons or doubts they may have before issuing the documentation, officially communicating to GS Inima Brasil so that it can, through a formal statement, clarify these doubts, present additional documents or resolve any other pending issues that may exist.

7. INTEGRITY CHANNEL

GS INIMA BRASIL encourages its Collaborators, Related Third Parties, Clients and Society in General to report any conduct contrary to this Policy to the Integrity Channel.

Compliance:

GS Inima Brasil Integrity Channel

Website: integridade.gsinima.com.br

E-mail: integridade@gsinima.com.br


Phone: (16) 3962-8158

8. SANCTIONS

The Collaborator or Related Third Party that fails to comply with any of the provisions of this Policy will be subject to applicable legal and contractual sanctions, as well as the sanctions provided for in the GS INIMA BRASIL Code of Integrity, such as disciplinary measures, including contractual termination.

9. RECORDS


There are no records pertaining to this document.

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10. ANNEXES

Annex I - Public Agent Contact Records Form

The Senior Management of GS Inima Brasil, including the Directors and Managers or whoever is delegated to act on behalf of GS Inima Brasil, who hold face-to-face or online meetings, or any interaction with Public Agents, must formalize such contact through the Public Agent Contact Records Form on the Compliance Platform or fill out the Form below and send it to the Person Responsible for the Compliance Area by email: integrity@gsinima.com.br.

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Annex I - Public Agent Contact Records Form

MEETING / MEETING ABSTRACT WITH PUBLIC AGENT		CONTROL NUMBER <i>(to be filled in by the Compliance Area)</i>	
DATE	TIME	LOCATION/ADDRESS	
ATTENDANTS		<i>[fill in the name, position and body/company represented]</i>	
AGENDA		<i>[brief description of the topics discussed at the meeting]</i>	