

TITLE:

Public Administration Relationship Policy

TYPE:

Norm

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1. Objectives

Establish guidelines for the relationship between Cooxupé and the Public Administration.

2. Presentation

According to Law No. 12,846/2013 and Decree No. 11,129/2022, it is highly recommended that legal entities have an Integrity Program in place, operating and effectively enforced, containing, among other parameters, specific procedures to prevent fraud and illicit acts in the context of bidding processes, in the execution of administrative contracts or in any interaction with the public sector, even if intermediated by third parties, such as paying taxes, being subject to inspections, or obtaining authorizations, licenses, permits and certificates.

Cooxupé values a relationship with the Public Administration based on the standards of behavior established in current legislation, in its Code of Ethical Conduct, Integrity Program and in this Policy.

- Note: “Public Administration: bodies, entities, public agents, authorities and civil servants of the Federal, State, Federal District and Municipal administrations, of any of the Executive, Legislative and Judicial Branches, including autarchies, public companies, mixed-capital companies and public foundations”.

This Policy applies to Senior Management, Cooxupé Employees whose function in the employment contract and/or job description establishes direct interaction with the Public Administration as a mandatory requirement or who have a power of attorney to represent it before the Public Administration; and to Business Partners who, due to the execution of a contract with Cooxupé, have direct interaction with the Public Administration.

- Note: All Stakeholders who do not meet the requirements set out above are expressly prohibited from having any interaction with the Public Administration on behalf of Cooxupé.

3. Descriptions / Responsibilities

Cooxupé's interaction with authorities, agents and servants of the Public Administration must comply with the following procedures and requirements:

3.1 – Meetings with members of Public Administration

Cooxupé holds meetings with members of the Public Administration to deal with matters necessary for the progress of its operations. In cases where this type of meeting is necessary, the following requirements must be observed:

a) Meetings must be previously formalized by Cooxupé with the public body or entity responsible for the public agent, authority or public servant involved. The formalization corresponds to the issues that will be addressed and any developments to be dealt with during the meeting. The name of the employees or business partners authorized to attend the meeting on behalf of Cooxupé must also be provided.

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b) Meetings will take place on the premises of the public body or entity involved. If this is not possible, the meeting will be held at Cooxupé premises, in an appropriate location. Cooxupé will appoint at least two people to take part and the choice will be based on the issues to be addressed/technical requirements. It is recommended that minutes of the meeting be drawn up, containing the issues discussed and their consequences.

- Note: Meetings will take place on the premises of the public body or entity involved. If this is not possible, the meeting will be held at Cooxupé premises, in an appropriate location. Cooxupé will appoint at least two people to take part and the choice will be based on the issues to be addressed/technical requirements. It is recommended that minutes of the meeting be drawn up, containing the issues discussed and their consequences.

3.2 – Offering presents, gifts, invitations to take part in events and visits

a-) Cooxupé is prohibited from offering gifts, prizes or courtesies of any kind or value to Public Administration bodies or entities and their respective public agents, authorities or civil servant.

b-) The offering of gifts is authorized as long as it is distributed as advertising/publicity for the Cooxupé brand, regular disclosure or on the occasion of events or commemorative dates and/or cordiality.

The offer must not refer to an alleged act of bribery or an attempt to influence the decisions of the body or public servant involved.

The offering of gifts must comply with the requirements set out in Cooxupé's Code of Ethical Conduct and also in the Code of Ethics of the Public Administration Body or Entity of the agent, authority or public servant receiving the gift.

c-) Cooxupé may invite public agents, authorities or civil servants to its private events, provided that they are occasional and related to technical or educational matters or those that involve the interests of the society in which it operates.

The travel, meals and accommodation of the public agent, authority or public servant taking part in these events may be covered by Cooxupé. Expenses may not include items or services considered luxury or excessively expensive by the standards of the locality where the event will take place.

Expenses will only be reimbursed on presentation of original receipts.

It is forbidden to include family members of public agents, authorities or civil servants in invitations to events and visits to Cooxupé, nor to make payments or reimburse expenses related to this purpose.

If the use of air transportation is necessary, the tickets will be provided directly by Cooxupé, and the amounts must be in line with the payments made for the purchase of tickets for Cooxupé employees when they are traveling on Cooxupé's behalf.

Cooxupé aircraft may not be used to transport public agents, authorities or civil servants, except in cases where commercial flights are unavailable. The act must be registered and filed by Cooxupé's Communications and Institutional Marketing department for evidence purposes. The registration must detail the purpose of the use of Cooxupé's aircraft by the public agent, authority or public servant involved, and must always be in accordance with the public activity carried out and in no way refer to an alleged act of bribery or attempt to influence decisions.

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It is forbidden to use Cooxupé aircraft to transport public agents, authorities or civil servants during election campaigns.

Employees and Business Partners are prohibited from using their own funds to pay the expenses of public agents, authorities or civil servants who are engaged in any particular Cooxupé activity.

- Note: The procedure referred to in item 3.2 of this Policy must be observed in conjunction with Cooxupé's Code of Ethical Conduct and the Code of Ethics of the Public Body or Entity of the public agent, authority or public servant involved, always applying the most restrictive rule among these three.

3.3 – Responding to requests from the Public Administration

Public Administration Bodies and Entities or their respective public agents, authorities or servants may request information from Cooxupé in order to comply with inspections, licensing, certificates, permits and other acts.

a-) When a public agent, authority or public servant enters the premises of the Cooxupé Headquarters without prior notice, they must be referred to the Institutional Communication and Marketing department, which will take the appropriate action.

In the case of Branches, Centers and Advanced Units, it should be sent to the Cooxupé Manager in charge of that location, who will make the necessary arrangements.

- Note: Visits or meetings scheduled in advance, must follow the provisions of item 3.1 of this Policy.

b-) Responses to subpoenas or requests for clarification requested by the Public Administration must be made by Cooxupé employees who can interact with the Public Administration due to their employment contract and/or job description or power of attorney authorizing them to do so. The employee involved must also have the necessary knowledge to answer questions clearly and objectively and, if necessary, submit the matter for prior assessment by the Tax Legal Department and/or the other areas involved.

Demands involving Business Partners may be answered by them, provided that the interaction with a public body or official is previously established in the Contract

- Note: Answers should preferably be given in writing.

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3.4 – Bidding processes and contracts with the public administration

a-) Bidding processes and contracts with the public administration

Bidding processes and the signing of contracts with the Public Administration will be carried out in compliance with the requirements of Law No. 8.666/1993, Law No. 14.133/2021 and other normative acts that deal with the matter in question.

b-) Employees and Business Partners of Cooxupé are prohibited from requesting information regarding a bidding process before the publication/dissemination of the respective notice by the Public Administration.

3.5 – Admission of former members of the Civil Service

In order to hire former members of the Public Administration as employees, Cooxupé may only do so after 6 (six) months from the date of retirement, exoneration, dismissal or removal from office of the public agent, authority or public servant.

4. Disciplinary procedures

In the event of a breach of this policy, disciplinary procedures will be adopted in accordance with item 2.11 of Cooxupé's INTEGRITY PROGRAM STANDARD.

Upon becoming aware of deviations affecting this Policy, Cooxupé employees and/or Business Partners must immediately report the case to the "Ombudsman" reporting channel, so that an investigation can be opened and the violation promptly stopped, in accordance with the INTERNAL OMBUDSMAN STANDARD.

In the event of detected and proven illegal acts involving relations with the Public Administration, Cooxupé will collaborate effectively with the investigations and the administrative process, informing the competent authority of the identification of all those involved in the administrative infraction of which it has knowledge and the swift delivery of information and documents proving the deviation.

5. Responsible internal body

Doubts about the implementation of this Policy should be reported to Cooxupé's Compliance Department (Risks, Ethical Conduct and Ombudsman).

6. Training

Employees and business partners who, as a result of their activities as representatives of Cooxupé, interact with the Public Administration, will receive specific training on the content of this Policy. Activities that result in a high risk for Cooxupé's integrity practices will be considered a priority for training.

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7. Exceptions

Exceptions to this Policy will be assessed by the Compliance Department (Risks, Ethical Conduct and Ombudsman) in conjunction with the Ethics Committee and the business area involved.