

ANTI-CORRUPTION POLICY



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Interpretation

PÓLUX: Pólux Indústria Eletromecânica Ltda.

THIRD PARTIES: All those who somehow have a business relationship with Pólux.

PUBLIC SECTOR: It can be considered as the set of organs, services and agencies of the State.

EMPLOYEE: Employee hired by Pólux and who is in the active staff of Pólux.

ACTIVE CORRUPTION: When a collaborator or third party acting on behalf of Pólux promises, offers, gives or authorizes an undue advantage to a public or private agent.

PASSIVE CORRUPTION: When a person, Collaborator or Third Party who acts in the name or interest of Pólux, or even related persons (such as relatives, friends, companies or other relationships), receives, demands, accepts promises or authorizes the receipt of undue advantage, public or private agent, especially to perform or refrain from performing one or more acts, lawful or not.

Coverage

This Anti-Corruption Policy applies to all Pólux employees, without hierarchical distinction, as well as to all third parties who have a business relationship with Pólux or on behalf of Pólux. The company expects that everyone who acts on its behalf will carry out all of their actions and decisions in an ethical, complete and transparent manner.

Contextualization

Law nº 12.846/13 deals with the objective, administrative and civil liability of legal entities for the practice of harmful acts. Law No. 12,846/13 became known as the Anti-Corruption Law.

This Policy must be read and interpreted in accordance with the International Convention against Corruption (UN, OAS and OECD), Federal Law 12.846/2013 and its regulations, Foreign Corrupt Practices Act (USA), United Kingdom Bribery Act (United Kingdom) and other rules of this nature.

Goal

The purpose of this Policy is to provide conduct guidelines and guidelines for decision-making by employees and third parties who relate to Pólux in order to reinforce and encourage high standards of transparency, ethics and integrity, in the prevention and combat of corruptive acts related to agents public or private, always in accordance with our mission, vision and principles, with the Code of Ethics, internal policies and procedures and legislation in force in Brazil or abroad.

The Anti-Corruption Policy requires compliance with Pólux Code of Ethics and all applicable and current laws and regulations relating to combating bribery and corruption, including, without limitation, the OECD and UN Convention, the UK Bribery Act of 2010 (UK Bribery Act - UKBA, its acronym in English) and the US Foreign Corrupt Practices Act (US Foreign Corrupt Practices Act - FCPA) and, in particular, Law No. 12,846/13 (Anti-Corruption Law).





Guidelines

Institutional and contractual relations with the private and third sector

Pólux institutional and contractual relationships can also take place with private agents, national or foreign, whether through our collaborators or through partners, suppliers and service providers, among other examples.

In these relationships, everyone must be aware of cases that involve promising, offering, giving or authorizing, as well as requesting, receiving or accepting promises of resources or money, but also gifts, meals, travel, accommodation, transportation and any and all expenses of logistics, favors, entertainment, among others, that may represent an undue advantage. It is worth noting that expenses provided for in cooperation agreements or partnership terms are not characterized as an undue advantage.

Payments to people in the private sector or third sector can only be authorized and made upon due proof of the object contracted and the respective financial consideration as an obligation of Pólux. They can also be carried out through bank slips or bank transactions whose beneficiary is the contracted individual or legal entity. Under no circumstances should payments be made in cash or by financial transactions destined to accounts bank accounts or beneficiaries of third party individuals or legal entities, even if they are responsible or legal representatives of the contracting party. Pólux believes in quality public education in the training of leaders who act in order to prevent situations that conflict with the interests of the Company and the country, always having as a reference our principles and compliance with internal or external standards. Therefore, we do not tolerate corrupt acts under any circumstances, including facilitation payments, in the Public Sector, Private Sector or Third Sector, without distinction.

Institutional and contractual relationships with the public sector

Payments due to the Public Administration, such as taxes, fees, agreements, fines and any other requested payments must be made only when provided for by law or regulation.

They must also be carried out through collection forms whose beneficiary is the competent public administration body or entity and through bank transactions from accounts held by Pólux.

Under no circumstances should payments to the public administration be made in cash or in bank transactions intended for the accounts of third parties, individuals or legal entities.

Also prohibited are “facilitation/bribery payments”, which are disbursements destined directly or indirectly to public agents in order to speed up, delay or ignore bureaucratic governmental acts under their responsibility or over which they have influence, except when expressly authorized in the legislation and in compliance with the provisions mentioned above.

All transactions must be properly accounted for, clearly and authentically, especially to indicate dates, values, object, holder and beneficiary.

Institutional and contractual relations with public administration, national or foreign, at all levels, spheres and powers, can take place in different ways, such as:

- a) Request and obtain permits, licenses, authorizations and certificates;
- b) Payment of taxes (taxes, fees, contributions, fines and others);
- c) Regulation and supervision (fire brigade, labor inspector, health surveillance and others);
- d) Bids or supply (goods and services);
- e) Conducting administrative or judicial proceedings;
- f) Execution of contracts or terms (partnerships, concession, agreement, cooperation and others).

It is clear that, before, during or even after the termination of these relationships, Pólux as a whole maintains an integrated posture with public bodies.

Suppliers and service providers

This topic provides for the liability of legal entities for the practice of acts that violate Pólux's Code of Ethics, as well as its good ethical customs that are always guiding the conduct and dealings of the Company.

The form of selection of suppliers and service providers are:

I – History of the company in the market;

II – Financial health of the supplier;

III – Productive capacity;

IV – Logistics and location;

V – Level of adoption of good practices;

VI – Competence in innovation management;

VII – Cost and flexibility;

VIII - Riscos;

IX – Communication;

X – Respect and adequacy of the anti-corruption law and other legislation pertinent to the subject, also mentioned in this policy.

As we can see, Pólux uses mechanisms that we consider essential for contracting suppliers and service providers, which means that we do not condone bribery and various forms of corruption that may involve dealings with suppliers and service providers, among others.

National and foreign legislation provides for the liability of legal entities for corrupt acts that are committed directly or indirectly, that is, the company may be liable for the acts of its employees or third parties, such as supplier partners and service providers.

In this way, all and all employees who relate to this public and who place Pólux at risk of public or private corruption, assume the duty of control, inspection and monitoring of the third party(ies) with whom it relates.

Pólux is committed to the process of contracting suppliers and service providers, and ethically conducts the evaluation process of registration, legal and reputational history. All contracts must have an Anti-Corruption Compliance clause. And, finally, a clear and continuous communication of monitoring and compliance with the responsibilities and duties mentioned herein must be established throughout the contractual relationship.

Shopping

No purchase will be made without properly characterizing its object and indicating the budgetary resources for its payment, under penalty of nullity of the act and responsibility of whoever gave cause.

Purchases, whenever possible, should:

I – Comply with the principle of standardization, which imposes compatibility of technical specifications and performance, observing, when applicable, the maintenance conditions, technical assistance and guarantee offered;

II – Submit to the conditions of acquisition and payment of the private sector;

III – Selection made through competition;

IV – Prior stipulation of the system for controlling and updating registered prices;

V – Evaluation of price and quality of the product.

After acceptance of the proposal, the supplier will receive the Purchase Order together with the general purchasing conditions. In cases where it is the first time that the supplier will supply Pólux, the latter will receive the Purchase Order together with the general purchasing conditions and a Compliance questionnaire to be completed. The questionnaire must be answered once a year or whenever there are necessary updates.

Hospitalities, gifts and other concessions

In our relationship with the, Private Sector or Third Sector, there are concessions with gifts, presents and hospitality. However, all payments or concessions, such as hospitality expenses, gifts and gifts, courses and training, among other hypotheses, must be expressed and authorized in national and foreign legislation, as well as in our internal policies and procedures and in the contract eventually signed between parties.

Also, no employee or third party acting on behalf or in the interest of Pólux should receive, demand, accept a promise or authorize the receipt of these concessions, especially in order to perform or refrain from performing one or more acts, lawful or not. As well as, no collaborator or third party should promise, offer, give or authorize these concessions to a public or private agent, the same goes for the people related to them, especially for those who practice or refrain from practicing one or more acts, lawful or no.

Any act that may be in conflict with the provisions of this Policy must be communicated immediately to Pólux Directors. Any offer or receipt of giveaways, gifts or Other concessions must be in accordance with this Policy, as well as must be approved by Pólux's Directors.

Political contributions

All recipients of this Policy, as well the Pólux employees, may make personal contributions to parties or politicians, but are not authorized to link such contributions to the name of Pólux.

Other unspecified responsibilities

Any and all situations that may represent a violation of this Policy, especially due to the conduct of an employee or third party acting on behalf or in the interest of Pólux, especially that may represent cases that imply promising, offering, giving or authorizing, as well as requesting, receiving or accepting a promise of undue advantage, whether in the relationship with a public or private agent, even if not expressly mentioned in this Policy, must be expressly communicated to the Directors so that they can be analyzed individually and, when necessary, submitted for approval by the strategic leaders.

Transparency and fidelity in books and records accounting

All Pólux accounting books must always be up to date and with as much detail as possible, as well as reasonably contain all transactions of goods, with the documentation in force, including those referring to this Policy.

Responsibility

Responsibility for the management, monitoring, application and updating of this Policy rests with Pólux Legal sector, which must respond to its Directors.

Leadership

If you are part of the leadership board, you must lead by example. Orient your team, including when a new member arrives, talk about the Code of Ethics and Internal Regulations, this Policy and ethical issues, in any situation that is possible. Never cover up or ignore situations and issues of an ethical nature. Encourage communication between your team and say thank you when they bring you ethical dilemmas. It is important to highlight that the Leadership cannot scold or pressure any employee for making a communication or contributing to a verification process.

Acceptance of the policy

Every employee or third party acting on behalf or in the interest of Pólux must review this Policy and undertake to adhere to its terms and conditions.

Complaint channel

Pólux makes the Reporting Channel available to employees and the external public, through the Pólux website is safe and confidential.

Through this channel, reports of irregularities, violations of Pólux Policies and Internal Code, as well as other provisions that disrespect the company's vision of respect, procedures and internal rules and the legislation in force in Brazil applicable to Pólux, can be registered.

Version

This Anti-Corruption Policy is subject to change.

TERM OF RECEIPT AND COMMITMENT

I declare that I have received Pólux Anti-Corruption Policy, I am aware of its guidelines and provisions and, by signing this Term, I declare my commitment to fully comply with it in the conduct of my activities as a supplier () service provider () of Pólux and also to disseminate its content.

I further declare that all information provided to Pólux is true.

_____, ____ / ____ / ____.
(City) (Day) (Month) (Year)

Full name

Signature

CONFORMITY VERIFICATION TERM

Corporate Name: _____.
CNPJ: _____.

Pólux seeks to maintain a relationship standard with its suppliers and service providers based on integrity, sharing ethical values and compliance with applicable laws and regulations and all areas that are consistent with ethics and anti-corruption. As such, we are inviting you to share your anti-corruption and compliance practices with us.

1. Anti-corruption

1.1 Do we have a Code of Ethics, or similar document, known throughout the company? (If yes, attach supporting document).

Yes () No ()

1.2 Does the Code of Ethics clearly address anti-corruption principles? (If yes, attach supporting document).

Yes () No ()

1.3 Declares that it acts in accordance with national and international competition laws and does not participate in price fixing, market or customer allocation, market sharing or manipulation of bids with competitors; respects the intellectual property rights of others; does not directly or indirectly facilitate money laundering or terrorist financing; process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and only used for legitimate purposes; Commit to having an adequate cybersecurity management structure in place in your organization based on good industry practices, to ensure confidentiality, authenticity, integrity and availability of data, processes, products, systems and services, and ultimately, Comply with customs regulations and applicable export controls. (If yes, attach supporting document).

Yes () No ()

2. Human Rights

2.1 I declare that I do not use or contribute to slavery, servitude, forced or compulsory labor and human trafficking.

Yes () No ()

2.2 I declare that I do not employ workers under the age of 15 or, in countries subject to the developing country exception of OIT Convention 138, do not employ workers under the age of 14; no job workers under the age of 18 for hazardous work in accordance with OIT Convention 182.

Yes () No ()

2.3 Declares not to practice acts of violence, such as any unacceptable treatment of individuals, mental cruelty, sexual abuse, harassment or discrimination, including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Yes () No ()

2.4 I recognize and comply with the legal rights of workers to adhere to all globally applicable working time regulations. Pay fair wages for work and comply with all applicable wage and compensation laws globally. In the case of cross-border secondment of personnel, comply with all applicable legal requirements, especially with regard to the minimum wage.

Yes () No ()

2.5 I declare to act and establish a reasonable occupational health and safety management system. (If yes, attach supporting document).

Yes () No ()

2.6 I provide access to a secure mechanism for your employees to report potential violations. (If yes, attach supporting document).

Yes () No ()

3. Environmental protection

3.1 I declare to act in accordance with applicable statutory and international standards relating to the environment. I minimize environmental pollution and make continuous improvements in environmental protection. I establish a reasonable environmental management system. (If yes, attach supporting document).

Yes () No ()

4. Responsible sourcing of minerals

4.1 I declare to undertake reasonable efforts to avoid the use of raw materials originating in Conflict-Affected Areas and High Risk and contribute to human rights abuses, corruption, financing of armed groups or similar negative effects. (If yes, attach supporting document).

Yes () No ()